

**Specialist agricultural opinion**  
**Addendum to the**  
**SPECIALIST REPORT:**  
**Combined Screening Tool verification and Agricultural**  
**Agro-ecosystem Specialist Assessment of the**  
**proposed Sibanye Photovoltaic Facility situated on the**  
**farm Uitval near Westonaria, Gauteng Province**

**1 Introduction**

Johann Lanz was contracted by the Environmental Assessment Practitioner for the Sibanye Photovoltaic Facility, Zutari (Pty) Ltd, to review the specialist agricultural assessment that was done as part of the environmental authorisation for the facility and to provide an independent specialist opinion on the acceptability of the proposed development with respect to its impact on agricultural resources.

The specialist agricultural assessment entitled, Specialist Report: Combined Screening Tool Verification and Agricultural Agro-ecosystem Specialist Assessment of the proposed Sibanye Photovoltaic Facility situated on the farm Uitval near Westonaria, Gauteng Province was completed by Piet Steenekamp and dated 17 August 2022.

**2 Background to the assessment of agricultural impact and the purpose of the Agricultural Protocol**

The purpose of the agricultural component in the Environmental Authorisation process and of the Agricultural Protocol is to ensure that South Africa balances the need for development against the need to ensure the conservation of the natural agricultural resources, particularly land, required for agricultural production and national food security. The agricultural protocol achieves its purpose, in relation to renewable energy developments on agricultural land, by imposing allowable development limits on different agricultural sensitivity categories of land. For solar energy, which occupies large surface areas, it essentially establishes a threshold, in terms of the land's agricultural production potential, to determine whether solar development should be approved or

not. That threshold is determined by the scarcity of arable crop production land in South Africa and the relative abundance of land that is only good enough to be used for grazing. If land is of sufficient land capability to support viable and sustainable crop production then it is considered to be above the threshold for needing to be conserved as agricultural production land rather than used for solar energy. If land is not of sufficient land capability to support viable and sustainable crop production, then it is considered to be below the threshold and the replacement of agricultural production with solar energy generation can be justified.

### **3 Review**

The agricultural assessment finds that the proposed solar development will lead to the permanent loss of 851 hectares of land that is of sufficient land capability to support viable and sustainable crop production. This exceeds the allowable development limits of the Agricultural Protocol, which are designed to minimise the loss of scarce arable land. The assessment makes recommendations of potential alternative sites that would be far more preferable from an agricultural impact perspective. This review fully agrees with these findings.

The agricultural assessment concludes that this impact on agricultural resources is not acceptable and that approval of the proposed facility is therefore not supported. This review agrees that from the narrow perspective of ensuring the conservation of scarce arable land, which is the focus of an agricultural impact assessment, the proposed development should indeed not be approved. However, the final approval decision needs to be a broader assessment and weigh the loss of arable land against potential benefits of the proposed development, both to agriculture and to the wider society.

There are other factors which I believe weigh the decision in favour of the approval of the proposed solar development. The most important of these that has direct agricultural benefits, and that can therefore serve to off-set the loss of arable land resulting from the proposed solar facility, is the Bokamosa Ba Rona agri-industrial and community development project. The proposed solar facility is an integral part of this project that is necessary for the project's initiation phase. This project will create regenerative primary agricultural production in the West Rand that is supported by renewable energy integration. 30,000 hectares of agricultural land have been donated by Sibanye Stillwater for this project. It should be noted that there are significant, additional economic and societal benefits associated with this project that are not directly agricultural.

Another agricultural benefit of the proposed solar facility that off-sets the loss of arable land is that all renewable energy development in South Africa decreases the need for coal power and thereby

contributes to reducing the large agricultural impact that open cast coal mining has on highly productive agricultural land throughout the coal mining areas of the country.

Ultimately the decision of whether to approve the proposed solar facility or not is beyond the narrow scope of the agricultural assessment. The final approval decision needs to integrate all of the multiple costs and benefits associated with the project. In the end it must ask: which choice offers the most benefit to South Africa – the proposed solar facility with its associated agricultural and other benefits, or the retention of the 851 hectares of agricultural land on the site in the absence of the benefits that are dependent on the approval of the solar facility.

A handwritten signature in black ink, appearing to read 'J Lanz', with a stylized, sweeping horizontal line above the letters.

Johann Lanz (Pr. Sci. Nat.)

23 August 2022