

On behalf of Earthlife Africa <https://earthlife.org.za/> is a non-profit environmental justice organization that works with and supports communities on the ground in South Africa (including in Limpopo), in addressing environmental issues. ELA aims to seek a better life for all and for a society living within the ecological limits of sustainable development with an equitable distribution of resources for all, respect for all living things, and the end of social, economic, and political exploitation seeks a better life for all people without exploiting other people or degrading their environment.

Earthlife Africa is registered as an Interested and Affected Party related to the Musina Makhado Special Economic Zone proposal and has submitted an objection to the development of the Special Economic zone based on the following concerns.

We learned through the media that there is a memorandum of understanding signed between the UNDP and the MMSEZ.

As an Interested and Affected Party, we do not have a copy of the MoU that will give us more clarity on the agreements signed between the parties however we would like to highlight the below concerns and lodge a complaint that in our view the agreement signed will not be of benefit for climate change mitigation, protection of biodiversity and pulls SA commitment to transition to a low carbon development backward.

The Project

Limpopo Economic Development Agency (LEDA), is promoting and facilitating the development of the Musina-Makhado Special Economic Zone (MMSEZ) at Bokmakierie, just off the N1, 50km South of Musina. This SEZ is going to contain a large coal-fired power station as well as 14 heavy industrial metal processing plants.

Concerns

These activities will have significant impacts on water use, air pollution, climate change, biodiversity loss, sacred and heritage sites, and many other aspects of life for people living in the area. It is important for people to understand what is going on in order to protect their rights and ensure that their lives and livelihoods are not negatively impacted.

The Bill of Rights in the South African Constitution guarantees a safe natural environment for current and future generations. Section 24 in the Bill of rights "Everyone has the right to an environment that is not harmful to their health or well-being; and to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development".

THE MMSEZ AND WATER

The MMSEZ expected to use 80,000,000 m³ of water annually, which is a large amount of water for an area known for its water scarcity. The EIA report recognises the fact that currently the water supply necessary for the operation of the project does not exist. Officials from LEDA have stated that water is available and can be obtained from neighbouring Botswana and Zimbabwe, as well as "excess water supplies" from the municipalities of Musina and Makhado. These towns have experienced water

shortages in the past and it is questionable whether they have excess supplies. The report also speaks of dams and other water schemes that could be constructed in order to supply the project but these are not currently in existence and cannot be guaranteed. Water is a precious resource required for domestic use, farming and tourism activities in the region and any shortages will have a significant impact on businesses, communities and livelihoods. There are many well-known cases in South Africa of communities that suffer in a variety of ways due to the abuse of water sources for activities like this.

THE MMSEZ AND AIR QUALITY

The project anticipates the construction of a very large coal-fired power station (3300 MW to 4600 MW). It is well known that coal-fired power creates enormous quantities of toxic air pollution which impacts on the health of people in the area. In addition, the metallurgical plants (which include coking plant, a steel smelting plant, and other similar heavy industrial plants) are known to produce significant air pollution. Similar activities in other parts of South Africa, such as Emalahleni (Witbank) and the Vaal Triangle, have a global reputation for being toxic and causing widespread health effects and premature deaths.

THE MMSEZ AND CLIMATE CHANGE

Climate change, or global warming, is now widely recognised as being the most serious threat that is ever faced humanity and the living world. Its effects are scientifically proven to include water shortages, threats to food production, severe weather events, the spread of disease, fires and heat-waves which impact on human health. South Africa is already among the world leading nations in terms of greenhouse gas emissions that create global warming. The EIA report indicates that the MMSEZ will contribute around 15% to South Africa's greenhouse gas budget. The scientific community and the United Nations have said that we need to be reducing our greenhouse gas emissions by 7% per year until 2030 in order to prevent global warming to a point of no return. South Africa and the world cannot afford investing in developments that radically increase greenhouse gas emissions in this way. The main contributor to the project's greenhouse gas emissions is the very large coal fired power station. Although some people talk about "clean coal", there is actually very little that can be done to reduce such a power station's emissions and much of its air pollution. The report recommends that the use of renewable energy for the project will reduce these impacts.

THE MMSEZ, HERITAGE AND SACRED SITES

The EIA report lists 178 heritage sites of importance including burial grounds and graves. The report does not detail the area's cultural and spiritual significance to various communities and individuals. The site will basically be cleared of almost all the vegetation and natural features in order to make way for roads, concrete platforms, and the heavy industrial equipment that will be permanently installed. This will completely destroy all heritage and cultural features. The site will be a high-security zone with strict control for access and only authorized personnel and visitors will be allowed on the site once it is complete.

THE MMSEZ AND BIODIVERSITY

Biodiversity refers to the complete system of all living organisms and biological systems. This includes animals, insects, plants, and water system, which all work together to make sure that our planet remains life-sustaining. Biodiversity loss has been identified as one of South Africa's major environmental challenges. The report identifies a very serious impact on biodiversity that includes the loss of over 100,000 protected trees. It recommends that in order for the project to go ahead developers need to identify an alternate site that will offset the biodiversity loss at the MMSEZ.

THE MMSEZ AND JOBS

LEDA and other supporters of the project claim that it will be a job creation initiative and that they may be up to 21,000 jobs created by the project. However none of the parties involved have been able to supply details around the nature of these jobs and who stands to be employed in the project. The facilitators of the public participation in meetings stated that most of the permanent jobs that will be created will be for skilled people coming from China which indicates that the scope for meaningful employment is limited. The environmental damage caused by the project will in all likelihood impact the tourism and agricultural sectors and the possibility of job losses in those sectors is very high. It is, therefore, possible that the project will lead to less jobs being available for local people in the future.

Yours Sincerely,

Makoma Lekalakala

Earthlife Africa Jhb