

**From:** [Animal Law Reform South Africa Outreach](#)  
**To:** [REDACTED]  
**Subject:** RE: SUN INTERNATIONAL / ALRSA CORPORATE ACCOUNTABILITY PROJECT - REQUEST ACCESS TO INFORMATION  
**Date:** Tuesday, 07 March 2023 14:34:00  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)

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[REDACTED]

I trust you are well.

Thank you for your response and acknowledgement of receipt of our PAIA request dated 21 November 2022.

We thank you for your response to paragraph 6.1 of our request for access to information.

However, your contention that “Sun International doesn’t play a role in the egg and supply chain industry and in terms of paragraph 6.2 to 6.11, your request is not applicable to our business model and consequently this information is not available” is implausible and cannot be sustained. This is particularly given that in terms of Sun International’s Environmental Strategy, sustaining food security is a “specific emphasis” for the company as part of its “climate change journey”. Among other things, the Environmental Strategy highlights that:

“Serving food is an important component of Sun International’s guest offering. We believe value is in the value chain and through identifying initiatives such as sourcing fresh produce from local communities and committing to serve sustainable seafood in all our restaurants, is the first step towards developing and sustaining our food supply chain.”

Among the food items served to guests at Sun International hotels are eggs and egg products, which Sun International believes in sourcing from local communities and as fresh produce. Accordingly, Sun International cannot reasonably deny that it is a key role player in the egg supply chain.

You will note from our letter that some of the information requested relates to (among other issues) Sun International’s internal policies regarding animal welfare and environmental matters; records concerning Sun International suppliers in the sourcing of eggs in their egg supply chain; as well as Sun International’s own commitments to sourcing of eggs only from layer hens not housed in cages. We appreciate you providing the abovementioned Environmental Strategy but would like clarification on whether Sun International has specific policies or strategies relating to animal welfare. We have also asked for details of assets and stocks, and these would relate to details of eggs sold by Sun International. The full details of our request are detailed therein, and we have included the prescribed form.

We are happy to provide further clarification, and trust that you will furnish the records as requested in our PAIA request in terms of your statutory obligations, and to advance transparency and accountability in relation to the environment and the welfare of chickens, noting the Supreme Court of Appeal’s remark that:

“Corporations operating within our borders, whether local or international, must be left in no doubt that in relation to the environment...there is no room for secrecy and that constitutional values will be enforced.”

We look forward to receiving a fully compliant response to our request in terms of PAIA by no later than **22 March 2023**. A fully compliant response as required by PAIA would align with Sun International’s Sustainability Objectives, including to:

“Facilitate regular internal and external communication with key stakeholders on sustainability challenges, risk and opportunities;  
Report on sustainability strategies, goals and accomplishments in an open and transparent manner; and  
Create long-term shared value for all stakeholders directly and indirectly affected by our operations.” (Emphasis added.)

Should you fail to provide access as requested, we reserve our rights to exhaust the legal remedies available to us, including but not limited to, approaching the Information Regulator to lodge a complaint in respect of Sun International, and/or approaching the courts.

Kindly acknowledge receipt of this email.

Kind regards

[REDACTED]

**Outreach: External Liaison**  
Animal Law Reform South Africa  
[outreach@animallawreform.org](mailto:outreach@animallawreform.org)



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**From:** [REDACTED]  
**Sent:** Monday, 27 February 2023 13:04  
**To:** Animal Law Reform South Africa Outreach <[outreach@animallawreform.org](mailto:outreach@animallawreform.org)>  
**Cc:** [REDACTED]  
**Subject:** CORPORATE ACCOUNTABILITY PROJECT - REQUEST ACCESS TO INFORMATION

Dear Sirs.

Kindly find attached for your attention.

