



Att: Ms Tyhileka Madubela
Committee Section
Parliament of the Republic of South Africa
Cape Town

15 February 2011

Submission on the National Climate Change Response Strategy Green Paper

Thank you for the opportunity to make a written submission to the Parliamentary Portfolio Committee.

We would also be happy to make an oral submission to the Committee on this critically important policy issue.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'S Law', with a long horizontal flourish extending to the right.

Stephen Law

Environmental Monitoring Group

February 2011



Submission to the

National Climate Change Response Strategy Green Paper

The layout of our submission follows the structure of the Green Paper. We distinguish between *general comments* on the content of the various sections, and *specific comments* which are referenced against the various numbered paragraphs in the Green Paper.

A short profile of EMG is included at the end of this Submission.

Our recommendations are highlighted in *italics*.

General comments on the Green Paper

EMG has no doubt that climate change will have an unprecedented impact on the lives of millions of South Africans, and that its uneven impact will jeopardise efforts at achieving social equity and environmental justice. We therefore welcome the timeous intervention of Government to develop a climate change policy.

We would also like to congratulate the Department on a well-drafted document which together with the on-line comment facility, creates an excellent platform for engagement of members of the public and other stakeholders.

As an NGO our role is, in part, to reflect the voices of many South Africans who for many reasons, cannot engage with such a policy process. However, this has limitations and it must be accepted that the concerns of many urban and rural stakeholders potentially most affected by climate change impacts have not been captured in the consultation process. *We urge Government to continue to consult widely, and allocate sufficient skills and resources to the consultative aspect of this policy process in its subsequent stages.*

We are concerned with the ability of the Department of Environment to implement climate change policy, given that the key mitigation strategies will require firm action and significant policy re-orientation from “heavyweight” departments such as Treasury, Economic Development, Energy and Trade & Industry. Past experience shows that mandates of the Department of Environment are often trumped by conflicting “growth” imperatives of these other departments. *We recommend that Government evaluate mechanism for implementation of this policy, and delegate responsibility to the appropriate government department.*

Section 1 – Introduction

We welcome Government’s commitment to being a “responsible global citizen” and to reduce greenhouse gas emissions. *We believe that government should make this commitment widely known, internationally and locally, and ensure ordinary South Africans understand and support this position.*

Binding multilateral agreements and instruments currently offer the only viable means of reversing current climate trends. The need for our Government to commit to an international negotiations target of limiting the average global temperature increase to below 2°C above pre-

industrial levels cannot be emphasised enough. *We would suggest that there is sufficient evidence of the need to keep that increase less than 1.5 °C.*

We support Government's commitment to ensuring that international agreements are binding, but also "inclusive, fair and effective". However these terms are open to interpretation and even abuse, and in this light the Green Paper's statement of Principles is vitally important. *We recommend that monitoring and evaluation processes should be in place that assess actions against these Principles, and should include a healthy degree of public participation.*

We agree with the assertion that actions to address climate change must be undertaken within South Africa's developmental priorities. Not only are the poor most vulnerable to climate change impacts, but they are also most exposed to impacts of a transition to a low-carbon economy. *We believe that this points to the importance of integrating mitigation and adaptation measures. The most vulnerable must benefit from the "green economy". Furthermore, "development" itself needs to be transformed from a strategy hell-bent on growth to one that is people-centred, ensuring the range of basic human needs (not greeds) are met, and is compatible with the ecological limits of the earth.*

Section 2 – Objectives

Government's intention to make a "fair contribution" to stabilising greenhouse gas concentrations is laudable, but gives rise to the question of what will be "fair" in this regard. The implication is that, should our Government judge that other nations are not contributing sufficiently, we would renege on our commitments. Negotiating countries have a regrettable tendency to refuse binding commitments on the basis that others are not making similar or sufficient commitments. In this context the use of the word "fair" is not necessarily as neutral as it sounds. *We would like to see the Green Paper include clear targets and timeframes, with the scope to make them more strict should science require it.*

Section 3 – Principles

The Principles outlined in this section are all necessary and laudable.

We particularly appreciate the "people-centred approach" that is advocated, and the intention to promote the "informed participation" of all interested and affected parties. Essentially, this means every single natural and corporate citizen of South Africa.

The Polluter-pays Principle is also very welcome and a key means of achieving redistributive justice and a more sustainable economy. *We recommend that key greenhouse gasses, particularly those related to fossil fuel use are classified as pollutants.*

Section 4 – Strategies

This section argues for taking a "balanced approach" to mitigation and adaptation, and recognises that the transition to a low-carbon economy will involve some painful trade-offs. Finding such balance, and determining trade-offs in the best national interest, will be difficult to achieve and will be hotly contested. Legal and financial incentives and disincentives to promote the required changes will be unpopular amongst the more powerful and vocal sector of society, and will be strongly opposed. Strong leadership is required, but so is the real buy-in from all stakeholders. *We recommend that Government consult with NGOs to establish an open, multi-stakeholder dialogue process where the invariable tensions can be surfaced and managed.*

We welcome the prioritisation of “knowledge generation and information management systems”. But this must not be limited to technical knowledge only. Building resilience to climate change impacts means building political and social capacity as well as the usually understood technical capacity. We must accept that the general public will be forced to adapt in many and varied different ways – not all which can be supported through Government intervention. The proposed improved information management systems and better predictions can only bear fruit if the general public have the problem-solving capacity to make appropriate and measured responses in co-operation with Government, particularly at a local level. *We recommend a stronger emphasis on broad public education – in addition to the behaviour-change incentives and disincentives already mentioned in the Paper – coupled with greater accountability and transparency at local government level, and thus a stronger relationship of trust and co-operation between citizens and local authorities.*

We support the idea of a carbon tax. It is consistent with the Polluter-Pays Principle and is a just and transparent economic measure. But there is a danger of perverse effects, or increased costs passed on to those who have no alternative. *We suggest that carbon taxes be accompanied by carbon subsidies which promote less or more efficient fossil fuel use, or facilitate low-carbon development – such as improved public transport, support to small-scale organic farmers, etc.*

Section 5.1 – Water

General comments

The section on water in the Green Paper articulates a number of existing national policies, many of which are not being implemented. Merely repeating them is not helpful. *Instead, this section needs to a) articulate how to improve and regulate the implementation of existing policies and b) present policy responses to directly address the impacts of climate change on water, namely increased variability and evaporation rates, changes to average rainfall and runoff, and associated increases in the cost, both in terms of money and energy, of water management and provision.*

Specific comments

5.1.1. – Building resilience to climate change requires good water management institutions and systems that have open channels of communication and mechanisms for meaningful engagement between institutions and citizens. *Systems must be put in place to ensure that job descriptions, performance assessment and training facilitate deeper and more meaningful public participation.*

The goal of “affordable water for all” is currently some way from being met. Climate change should not be allowed to hinder this goal further. *Sufficient affordable domestic water for all must be prioritised above all other water use, once the ecological reserve has been met.*

5.1.2. – Given the slow progress and high level of unmet expectations in the CMAs, *these should not be held up as a model for promoting “equitable and sustainable” resource management until there has been an honest assessment of the functioning of the few operational CMAs.*

5.1.4. – The cost of water provision will increase as the impacts of climate change are felt. Combined with existing difficulties in providing affordable water to all, *we recommend a participatory review of how water is paid for. This would assess national transfers, municipal tariffs, and so on.*

Cost-reflective pricing of domestic water is not equitable nor socially and economically optimal, given the “public good” nature of household water. *National government needs to regulate municipal tariffs to ensure that they are progressive (pro-poor) and that technologies to limit water consumption are not targeted at poor households. Water rationing across the board (with*

the ongoing provision of free basic water) is the most equitable response to water scarcity.. Hedonistic water use (e.g. swimming pools, irrigated gardens, golf courses) must come at a very high price.

Cost reflective pricing must be in place for industry and business users, with possible limits to consumption as water scarcity increases. Both market and non-market mechanisms should be put in place to encourage water use efficiency.

5.1.6. – Wastewater treatment plants have the capacity to be almost self-sufficient in energy use, with the recovery of methane from anaerobic digestion; many plants already have biogas digesters that are no longer in operation. *Both capital and operating budgets must be made available for fixing and / or retrofitting existing infrastructure. New plant must be designed to be less energy and chemical intensive (e.g. through use of algal ponds).*

5.1.10 – The energy, environmental and operating costs of desalination are high. *EIAs for desalination plants must be done timeously and compared with alternatives, such as water conservation, waste-water reuse, and so on; retrospective EIAs, as have been carried out in the Southern Cape during the recent drought, are not good enough.*

5.2 – Agriculture

General Comments

The Green Paper takes adequate cognisance of the significance of potential climate change impacts on agriculture, and the particular vulnerability of small-scale and urban homestead dryland farmers. The Green Paper correctly notes that marginal crop land will become prone to reduced yields and crop failure through land degradation resulting in desertification – the permanent loss of productivity. Whereas desertification of rangelands is noted as a “serious problem”, it should be emphasised that desertification is both widespread and cataclysmic for local resource-using communities in South Africa, who may lose the ability to raise crops and graze livestock, and face diminished availability of water, firewood and building materials and medicinal herbs. Desertification is reversible only at great cost, and has enormous and costly down-stream impacts including siltation, increased run-off and flooding, reduced infiltration of surface water into aquifers and greater extremes of temperature. Not least, areas undergoing desertification vent the carbon stored in soils and lose the ability to sequester carbon in biomass and in the soil. *We recommend increased support to land users to enhance their capacity to use land both productively and sustainably, and to retain existing and sequester additional carbon in their production systems¹. We also note with concern that the Green Paper makes no mention of the Department of Agriculture’s LandCare Programme, which is an important vehicle for potentially providing some of the technical and material support needed to enable farmers to adapt to a changing climate.*

Existing environmental legislation should be more strictly applied to ensure that land is not degraded. *We recommend action to ensure that perverse incentives are not provided by government departments or developers that encourage illegal and/or irresponsible clearing of land, and/or land use practices that result in degradation of carbon fluxing.*

¹ The United Nations Convention to Combat Desertification (UNCCD) emphasises the importance of retaining productivity in agricultural areas, as opposed to attempting to restore desertified areas. Article 10.2 (c) of the UNCCD urges Parties to “give particular attention to the implementation of preventive measures for lands that are not yet degraded or which are only slightly degraded.”

The Green Paper notes the shifting preferences of European consumers away from carbon-intensive products. However, some South African products cannot be produced in Europe (e.g. rooibos, honeybush, marula), while others are produced with a smaller carbon footprint than their equivalents produced in Europe. Similarly, our markets abound in high-carbon imports of foods from other parts of the world that can all be produced locally with a correspondingly lower carbon footprint. *We believe that Government should target support for low-carbon agricultural exports that can compete in global markets that are sensitive to this issue, and provide disincentives for export-oriented carbon-intensive agricultural production. Furthermore, interventions to restrict the inflow of carbon-intensive products would not only be responsible, but would stimulate local production and create local employment.*

Conservation agriculture, and the practice of conservation tillage are advocated in the Green Paper, and research has demonstrated that these approaches provide excellent ways of sequestering carbon in the agricultural landscape. *We recommend that the Green Paper should outline what sorts of support are advocated by government: research, extension, subsidies, carbon audits and credits are all potential vehicles.*

Specific comments

5.2.3 – South Africa already boasts a large number of organic farmers, many of them marketing their products abroad. Local retailers are increasingly marketing organic products. In other words, the market exists for organic products. *We recommend Government engage with current organic producers, or producers wanting to convert; and to identify with them, in a participatory manner, what sorts of support Government could most usefully provide, be this in the form of scientific research, agricultural extension, business development financing, facilitation of market access, streamlining regulations and procedures, etc.*

5.2.5 – Investment in education and awareness programmes, linked to extension activities are of crucial importance². However, “adaptations” proposed by Government departments frequently involve investment that is beyond the means of farmers, particularly small-scale farmers. *We recommend that education and awareness programmes should be coupled to sources of financing that will enable land users to make these investments.*

5.4 – Energy

General comments

Energy issues are not central to EMG’s expertise, however we consider the following to be “no-brainers” with respect to mitigating carbon emissions.

Resources and incentives for the development and implementation of renewable energy technologies have been neglected for too long. While some of these technologies are arguably not yet economically or technically feasible, there are numerous studies which show clear benefits to job-creation and the economy, and indicate that Government’s neglect of this area has more to do with a lack of political will – considering for example, the taxpayer’s billions already spent on R&D into non-renewable nuclear energy with no positive outcome. *Development of renewable energy technologies must be a clear priority across all relevant government sectors.*

² This is consistent with Article 5 (d) of the United Nations Convention to Combat Desertification, in terms of which Parties are obliged to “promote awareness and facilitate the participation of local populations, particularly women and youth, with the support of non-governmental organizations, in efforts to combat desertification and mitigate the effects of drought.”

There are too many conflicting interest in the energy sector. Eskom, for example, as producer and distributor of electricity has no long-term interest in encouraging efficient electricity use, beyond seeking to match demand with available capacity. *Such conflicts of interest must be removed through re-allocation of the mandates of government department and agencies.*

Renewable energy sources, despite their short-comings, are the only sustainable long-term solution to climate change. Nuclear energy is not renewable. Large-scale hydro has significant social and environmental impacts. Both have significant carbon-footprints over their life-cycles. *Nuclear and large-scale hydro are not good options for replacing fossil fuel.*

Emission reduction should be encouraged by a carbon tax. It is consistent with the Polluter-Pays Principle and is a just and transparent economic measure. But there is a danger of perverse effects, or increased costs passed on to those who have no alternative. *Carbon taxes must be offset by equivalent carbon subsidies which protect vulnerable sectors, promote less fossil fuel use, and facilitate low-carbon development – for example, improved public transport, support to small-scale organic farmers, etc.*

Cheap electricity can no longer be considered as South Africa's comparative trade advantage. The promise of jobs is not sufficient argument, for example, for big aluminium smelters that bring little additional benefit to the economy, given that SA is neither a source of aluminium ore, nor a significantly large consumer of aluminium. Eskom should be legally constrained from contracting with industry merely on the basis of cheap electricity. *Electricity tariffs for households and industry should be increased to reflect real costs, and should be stepped to ensure affordability for the poor, discourage wastage and promote efficiency in households and industry.*

Significant moves have been made to encourage energy efficiency at a household level, with the campaign to replace incandescent lights, and the solar-water subsidies. However, much more can and should be done. *Implementing energy efficiency programmes must be taken on with vigour by an appropriate and non-conflicted Government department or agency.*

Emissions from motor vehicles add significantly to the country's carbon emissions. Our towns and cities are planned around the motor-car and many commuters have little choice. Where commuters do have a choice, many are discouraged by crime, overcrowding and inefficiency on public transport. *Greater investment must be made into efficient public transport and other means of getting cars off the roads in all major cities. Incentives must be provided to local authorities to develop public transport plans.*

5.8 – Natural Resources

TERRESTRIAL BIODIVERSITY

General comments

The arguments regarding the threats to terrestrial biodiversity are valid and significant. It should be noted that production of South Africa's most economically significant indigenous agricultural product, rooibos tea, is vulnerable to the predicted climatic change in the Fynbos biome, and that conservation of its wild genetic diversity in the wild is vital to ensuring the survival of the industry and the livelihoods that depend on it.

The importance of conserving, protecting and managing wetlands and rivers cannot be emphasised enough. Projected increase in water demand, and the stress it will place on water resources in many parts of the country will no doubt pressure authorities to build more storage and irrigation dams, to the ultimate long-term detriment of natural water systems. *We recommend that conservation efforts be accompanied by the promotion of low-impact alternatives such as rainwater harvesting, appropriate agricultural practices, efficiency measures, leak-fixing, etc.*

Specific comments

5.8.2 – Facilitating partnerships is a vitally important function of Government. *We recommend that the Paper articulate the need for transparency and access to information that will allow such partnerships to be built on trust. Furthermore, partnerships should provide members with equal voice and shared decision-making responsibility (while recognising comparative advantage and specific legal responsibilities), should reflect local priorities, help create an enabling environment for effective action and should be goal-oriented.*

5.8.5 – Measures to combat the spread of alien and invasive species and the destruction of sensitive ecosystems are important. *We recommend that they be coupled with appropriate and sufficiently punitive implementation of legislation to ensure that land owners undertake the management of invasive species on their own land.*

MARINE BIODIVERSITY / FISHERIES

General comments

That the role of artisanal fishers as historical and potential future custodians of marine resources is not explored in the Paper is a significant gap. Undoubtedly their livelihoods and lifestyles will be severely affected by the impact of climate change on ocean currents, sea-level, species migrations, etc. But given their traditions and long-term interests, they are also ideally placed to act, with appropriate support, as monitors and custodians of near-shore marine resources in times of rapid change. There is currently draft policy which envisages the creation of near-shore marine zones for the exclusive use of artisanal fisher communities. *We recommend appropriate support for climate change adaptation work with artisanal fisher communities, so that they are empowered to sustainably manage marine resources. This support should include ensuring that communities have robust social and institutional structures in place to manage the resource and allocate benefits, and also that communities can access markets that provide adequate returns for “sustainably harvested” fish and other marine products.*

5.9 – Human Society, Livelihoods and Services

General comments

Adaptation strategies in both rural and urban settings require building a more robust infrastructure – to cope with floods, droughts, and other climate change impacts. But just as important is the building of political and social resilience capacity at a very local level, such that citizens are empowered and able to make informed choices rather than being dependent on Government. This points to the critical need for an open and honest relationship between citizens and Government institutions.

Section 6 – Roles and responsibilities

General comments

The statement that climate change “does not change what work is done or needs to be done” is confusing and problematic. It implies a business-as-usual approach. Climate change certainly *should* change “what work is done”. The just transition to a low-carbon economy and an adapted society requires huge shifts in both what we do and how we do things as a country. While the mandates of some Government departments may remain (e.g. Health, Education, etc.), key departments that influence our economic trajectory (e.g. National Treasury, Trade & Industry, Mining & Minerals, etc.) will need to change “the work they do” in a fundamental way.

Section 6.2 – Social Partners

All spheres of Government have a responsibility to support, co-facilitate and participate in platforms for dialogue between civil society and government. These platforms need clear 'rules of engagement' in terms of transparency, feedback, mutual respect, etc.

Section 8 – Inputs and Resource Mobilisation

8.1 – Financial Resources

8.1.8. To date there is little evidence that carbon trading leads to actual reductions in greenhouse gas emissions. *We believe that the support this concept has received from the global business community, versus absolute cuts, has more to do with the fact that the carbon trading system requires very little real change in the way industry operates. We recommend in-depth research into the real carbon-reduction benefits of carbon trading (not just the administrative feasibility) before such systems are supported or established with tax-payers money.*

8.3 – Technological resources

The statement that mitigation requires “hard technologies” and adaptation “soft technologies” is unhelpful and inaccurate. Both forms of technology will have to be applied to adaptation and mitigation as appropriate. *We recommend this paragraph be redrafted.*

Section 9 - Monitoring, Evaluation and Review

General comments

The processes of monitoring, evaluation and review described in the Green Paper are undoubtedly of crucial importance. However, the Green Paper omits any mention of monitoring of adaptation initiatives. Without adequate monitoring, expenditure and efforts in this direction might deliver negligible results, and even produce outcomes that cannot be described as increasing adaptive capacity or enhancing the sustainability of livelihoods. *We recommend an additional sub-section is drafted on “Monitoring, Verifying and Reporting Effectiveness of Measures to Support Adaptation”*

Furthermore...

We recommend that the Department of Environmental Affairs be the leading government department to define review mechanisms for adaptation, but that it work closely with other departments and agencies, para-statal, research institutions and NGOs to ensure that policy and budgeting is informed by emerging best-practice in adaptation. The processes of monitoring and review should thus engage this range of actors, and enable the conclusions to be enriched by their insights.

With respect to adaptation in the agricultural sector, we recommend that the monitoring and verification processes should involve participatory evaluation by land users so that their experiences and perceptions also inform decision making at other levels³.

³ Article 10.2 (f) of the UNCCD calls for Parties to “provide for effective participation at the local, national and regional levels of non-governmental organizations and local populations, both women and men, particularly resource users, including farmers and pastoralists and their representative organizations, in policy planning, decision making, and implementation and review”.

Background to EMG

The Environmental Monitoring Group (EMG) is a not-for-profit organisation established in 1991 and based in Cape Town and Nieuwoudtville, with a full-time staff of 9. EMG works to raise awareness and encourage debate on issues relating to people and their relationship with the natural resources and the natural environment. We believe that society's ability to live sustainably on the planet is intimately connected to the way we relate to each other – as individuals or groups. Our focus is thus on people and relationships, rather than on nature.

EMG's expertise and insight with respect to climate change arise from past and current work, which includes:

- Research into the complexities of climate change impacts on urban water service delivery; sharing this understanding with social activists, local authorities and others; and supporting affected communities to advocate for better water services.
- Community development work with small-scale farmers in semi-arid areas, including adaptation strategies, alternative markets, conservation farming, etc.
- Adaptation projects with artisanal fisher communities
- Research into how local municipalities in the Eden District (south Cape coast) have responded to the worst drought in 130 years; in particular balancing competing needs for water between industry, agriculture and households, and between rich and poor.
- Promoting and information sharing around rainwater harvesting in urban and peri-urban households.
- Facilitating multi-stakeholder research and dialogue around natural resource and service issues
- Facilitating interaction on climate change issues between artists and scientists
- Targeted information sharing and awareness raising events on climate change with other NGOs, various civil society networks, and the general public.
- Targeted information sharing and awareness raising events on adaptation methodologies with other NGOs and networks.

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