

## ENGEN COMMENTS ON SOUTH AFRICA'S NATIONAL CLIMATE CHANGE RESPONSE GREEN PAPER

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Engen Petroleum is submitting comments below with the full understanding that solving the climate change problem requires multilateral effort from stakeholders beyond the borders of South Africa.

1. The title of the paper/policy, which we believe says a lot about the contents inside, should be changed to “National Climate Change Green Paper” rather than “National Climate Change Response Green Paper”. It is our thinking that the national climate change policy should be much more encompassing than being a “response” and this can be suggested if the name evolves to “National Climate Change White Paper” which will suggest being much broader and proactive than what would be suggested by a “National Climate Change Response White Paper”.
2. Our GHG emission reduction pledge back in December 2009, whereby South Africa committed at Copenhagen to reduce its greenhouse gas emissions by 34% by 2020 and 42% by 2025 below business as usual, is much more than what most of the Annex 1 countries are likely to do in their mandatory requirements. As such, the National Climate Change Response Green Paper should be very specific in mainstreaming the conditions that we put in implementing our pledge, that of receiving the necessary finance, technology and support from the international community. Being a developing country, and recognizing that we are doing this as part of our commitment to the UNFCCC main objectives that recognize common but differentiated responsibilities, putting this emission burden on the shoulders of South Africans alone will not be an equitable process in the context of an initiative that requires multilateralism to be effective.
3. The National Climate Change Response Green Paper has been developed from an emissions reduction rather than a sustainable development perspective and objective. In reality we are a developing country still contending with numerous challenges of social and community development. We feel that the national climate change policy, especially on GHG reductions, should be informed by the outcomes of COP17 on three main fronts;
  - a. the seriousness emissions reduction by Annex 1 countries for the second commitment period
  - b. the willingness of international community (and Annex 1 countries) to meet our requirement for receiving the necessary finance and technology support
  - c. the collective approach of all developing countries (China, India and Brazil) to domestic action in view of the pressure from Annex 1 countries

As such, we strongly suggest that finalization of the national climate change policy process should wait until when the multilateral agreement on the second commitment period has been reached.

4. In its current form the National Climate Change Response Green Paper does not give due focus on adaptation issues. We should not forget that adaptation has more priority in the context of our economic development level and needs. The National Climate Change Response Green Paper can provide guidance on how government would support industry/corporate action on adaptation programs, as it does on energy efficiency programs.