

**Comments on the  
NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER 2011**

***Environmental Monitoring Group (EMG)***

**Comments in Sec 5.3 and 5.7 are endorsed also supported by the *Association for Fairness in Trade*, representing small-farmers and farm-workers producing for the fair trade market.**

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**General comments on the White Paper**

Congratulations on a well written and comprehensive paper. EMG supports the overarching objective to *'build the climate resilience of the country, its economy and its people and manage the just transition to a climate-resilient and lower-carbon economy and society.'*

For the most part, we believe that EMG can work within, support and help give effect to the strategies and plans presented in this paper. There are, however, some notable gaps. The White Paper falls short of tackling some characteristics of South African policy and governance that currently prevent us from swiftly reaching a low carbon, environmentally sound and inclusive economy and society. These obstacles will need to be addressed in the myriad of strategies and sector responses that emerge from this paper, and include:

- the gap between policy or vision and implementation, in which attention needs to be paid to building responsive institutions;
- fundamental points of conflict where the economic growth strategy hits the sustainability strategy needed to respond to climate change (the 'green economy' proposed in the White Paper is insufficient to tackle this, and in the long run could even be problematic);
- incentives or tender procurement processes that run counter to climate change imperatives, especially at local government level where, for example, financial regulations and procedures prohibit investment in renewable energy projects with more than a 5-year return horizon or water demand management that hurts poor urban communities;
- sector strategies are not being done, for example the National Water Resources Strategy is four years late, yet this White Paper relies on the NWRS to implement water-related climate change concerns

EMG appreciates the inclusion of (some) targets and time-frames, e.g. well below 2 degrees, 5 year review, 2 years to produce/align sector strategies; and publication of GHG emissions trajectory

range. However we believe these targets are not sufficiently ambitious and nor is it clear who will ensure that they are met. Parliament has an important oversight role to play in this regard.

Climate change and how we respond to it brings such fundamental changes to our society and economy that it is even more urgent to ensure that meaningful engagement takes place between state and non-state actors, in particularly organised civil society. The White Paper lacks imagination and gravity in this regard. Emerging strategies need to include practical (not rhetorical) ways for engagement, particularly at local government level.

## **COMMENTS ON SPECIFIC SECTIONS, WHERE EMG HAS EXPERTISE AND EXPERIENCE AND STRONG PARTNERSHIPS**

### **5.2 Water**

This section doesn't say much in general. As with the Green Paper, it is more or less a repetition of what is in existing water policy, much of which is currently *not being implemented*. It doesn't adequately tackle new challenges that climate change will bring, or how climate change will exacerbate existing fault-lines.

It is appropriate to integrate climate change response for the water sector into the NWRS and the Water for Growth and Development Strategy, but Parliament must play a stronger oversight role. The NWRS is supposed to be revised every 5 years, but to date only one has been published.

5.2.4 correctly refers to 'investment in water conservation and water demand management', however this should be qualified. It is critical that the aim of WC/WDM is to stop water wastage, rather than limit water to those who can pay. Currently many tariff structures, water restriction technologies and other local government mechanisms punish people for being poor, rather than punish water guzzlers.

5.3.5 cites desalination as a resource to be explored. Desalination is a highly energy-intensive process and it is thus critical that this exploration happens in an open, transparent and inclusive manner. This includes multi-stakeholder engagement, clear decision-making criteria, public access to financial data and analyses, Environmental Impact Assessments, and so forth.

The White Paper fails to mention:

- climate change as an opportunity to overhaul the water-water treatment system to one that is climate-resilient by removing the need for coal-fired electricity through increased use of sun, algal ponding, and biogas released from treated effluent
- increased risks to existing dams and other infrastructure from climate change, which could result in the need for increased monitoring or reinforcing

### **5.3 Agriculture and commercial forestry**

This section correctly identifies small-scale and subsistence farmers as being particularly vulnerable to the impacts of climate change *and* their potential to create jobs, ensure food security, and contribute to maintaining biodiversity – with a relatively low carbon footprint.

The improvement of short-, medium-, and long-term forecasting capacity and modelling techniques and scenario-building (5.3.2); and early-warning systems (5.3.4.) and their effective dissemination to the agricultural sector, particularly small-scale farmers, is essential. However by their nature, forecasts and scenarios have a wide error-margin and it is equally important that the dissemination of this kind of information is accompanied by education on how farmers should use the information, and a well-informed extension service.

The focus on research into water and soil conservation techniques, and other climate-relevant issues (5.3.3.) is welcome. However it is clear that there are already agricultural techniques (organic production, low-tillage, etc.) that do not need further research, but would benefit from other forms of state support (e.g. labelling, marketing, specialist extension services, etc.). Under the *Human Settlements - Rural* section, paragraph 5.7.4. addresses the need for research and development of low-impact technologies for rural communities. Many such technologies already exist (e.g. wind and solar pumping, organic pest control, etc.) and can be begin to be immediately implemented with appropriate incentives, subsidies and dedicated extension services.

Successful adaptation is about people and their capacity, more than goods or services. The focus on education and awareness programmes (5.3.5. and also 5.7.1.) is thus welcomed. However, it is essential that government's extension workers are also educated and trained, not only in the elements of climate change and agricultural adaptation processes, but also in participatory community facilitation. Unless farming communities are widely consulted and participate in such programmes, no real capacity will be build and their ability to adapt to change will be compromised.

Government should also support the many other civil society institutions who are already running successful educational and awareness programmes.

In some parts of the country, the success of small-scale farming is under threat from agro-industry or mining. Priority in land-use allocation should take into account the carbon footprint and livelihood security of competing activities.

## **5.6 Human settlements – urban settlements**

The challenges to urban human settlements are well articulated. Unfortunately the recommended responses, which are primarily technical, don't address the identified challenges. In particular, the second and third challenges link to the inertia of city service delivery mechanisms and the interface between residents and their environment – these are challenges that can't be dealt with through 'technical' (models, tools, design, technology) responses alone; promoting 'behavioural change' is an important idea, however it is insufficient to balance the technical interventions because in practice it usually means sending people lots of information about what they should do differently, in the hope that they will change. The challenge is to find ways to shift *relationships*, both at individual and institutional levels. This includes multi-stakeholder 'confrontative' dialogues, re-connecting with

nature, and so on. To shift municipal inertia, fragmentation between line departments, the power of the finance department, and inappropriate performance assessment criteria need to be tackled.

### **5.7 Human settlements – rural settlements**

Paragraph 5.7.4. addresses the need for research and development of low-impact technologies for rural communities. Many such technologies already exist (e.g. wind and solar pumping, organic pest control, rainwater harvesting etc.) and can be begin to be immediately implemented with appropriate incentives, subsidies and dedicated extension services.

### **5.8 Human settlements – coastal settlements**

Research into the potential impacts of climate change on the livelihoods of artisanal fishers (5.8.5.) is welcomed. However, building adaptive capacity requires that artisanal fisher communities are participants in that research and play a key role in directing the research into priorities they identify. Similarly, their participation is key in the development of plans to protect sensitive marine environments (5.8.3).

### **6.3 Mitigation potential**

Biofuels – be very wary of growing crops for cars; think rather of methane from waste-water treatment; or using only crop waste for biodiesel.

### **8. Near-term priority flagship programmes**

EMG supports the accelerated provision of rainwater harvesting tanks (8.2). It would be good to have this as part of a more comprehensive rainwater harvesting strategy that, for example, also addresses keeping water in the landscape.

Recovering energy from waste-water treatment works and inclusion of algal ponding technology are interventions that are easy to implement in the immediate term. They should form an integral part of the renewable energy flagship programme (8.3) and/or the waste management flagship programme (8.6). This will address the issue of poor waste-water treatment at same time as reducing GHG emissions.

It is unclear from the White Paper what the relative priority of the flagship projects is, and what budget is to be allocated to each of them.

### **10.2 Roles and institutional arrangements**

Parliament needs to play a stronger *oversight* role in ensuring that what is agreed here is done and time-frames are met (10.2.1)

Local government's crucial role is identified (10.2.6) but what it needs to do is not well articulated, nor is the 'crisis of local government' adequately addressed.

EMG supports the re-examination of fiscal measures, but this should be done in a participatory manner (10.2.6).

### **11.1.2 Mobilising finance**

Include a review of existing taxes and subsidies to identify those with a perverse effect on climate change, and develop strategy to phase them out over time.