

25 October 2011

Committee Section
Attention: Ms Tyhileka Madubela
Parliament of RSA
PO Box 15
Cape Town
8000

ATTENTION : Ms Tyhileka Madubela

Dear Ms Madubela

NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER 2011

WESSA is South Africa's oldest and largest membership-based environmental non-government organisation, operating across all regions of South Africa, and our mission is to promote public participation in caring for the earth.

In response to the National Climate Change Response White Paper, 2010, WESSA would like to make the following comments, which should be read in conjunction with our comments on the National Climate Change Response Green Paper:

1. COMMENT TIMEFRAMES

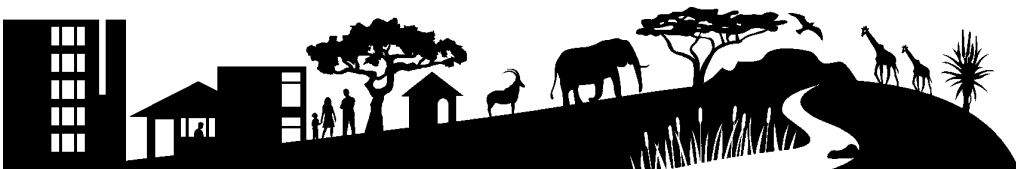
It is of concern that the National Climate Change Response White Paper appears to have been gazetted for comment on 13 October 2011 for comment by 25 October 2011. Twelve days (or eight working days) to prepare a considered response seems an unreasonably short comment period considering the complexity of this issue, and the far-reaching implications of a national strategy for coping with climate change.

Under these time constraints we urge that these comments should be read in conjunction with our comments on the Climate Change Response Green Paper, dated 09 February 2011.

2. GENERAL COMMENT

We would like to commend the Committee on the development of a well-reasoned White Paper and policy that addresses the complex issue of climate change mitigation and adaptation with resolve. We are particularly supportive of the introduction of ambitious timeframes for the mainstreaming of the National Climate Change Response strategy into policies and activities of all spheres of government. This clearly articulates government's commitment to rapid and meaningful change and a strategy to avoid the costs associated with delay and inaction.

It is imperative that this rapid policy realignment produces tangible action; the meaningful implementation of adaptation and mitigation strategies on the ground. The achievement of the objectives of the response strategy, as previously discussed in the Green Paper and now articulated in the



NATIONAL OFFICE

1 Karkloof Road, Howick
PO Box 394
Howick
3290

Tel (033) 330 3931 ext 122
Fax (033) 330 4576

www.wessa.org.za

FOUNDER MEMBER OF



International Union for
Conservation of Nature
Reg No. 1933/004658/08
(Incorporated Association not for gain)
Registration Number in Terms of the Non
Profit Organisation Act 1997: 000-716NPO
Tax Exemption Number: 18/11/13/1903

DIRECTORS

Messrs: Dr RG Lewis (Chairman),
Prof. M Kidd, J Pinnell (National Treasurer),
Dr RJ Taylor, P Burger
Mesdames: DL Perrett (Vice Chairman)
SML Gumede (Chief Executive Officer)
S. Erasmus

MR Ward Company Secretary
MJ Powell (Exco Chairman)

White Paper, will depend on the levels of commitment to such strategies and allocation of resources to them. We urge that both be significant.

While WESSA fully supports the development of information management systems and the use of accurate scientific data in helping to map out the detail of SA’s mitigation and adaptation strategies, we urge that time is not wasted on the detail when general trends and their causes are well understood and credible, and mechanisms exist within our existing legislative and policy framework to take immediate action to towards climate change adaptation and mitigation.

In addition to a review of all existing legislation, regulation, strategies and policies and plans, the White Paper should promote the *implementation* of existing mechanisms that have much to contribute towards the achievement of the policy objectives, where these are not being effectively or consistently applied/rolled-out. Good examples of such mechanisms would be the roll out of the National Programme of Action for the Protection of the Marine Environment from Land-based Activities (Department of Environmental Affairs and Tourism, 2008), or the prioritization of Resource Directed Measures for our water resources. The continued poor/limited implementation of these existing mechanisms will undermine the achievement of the policy objectives and increase our vulnerability to climate change-related impacts.

3. SPECIFIC COMMENT

The following comments are specific responses to issues raised by the Green Paper, in the order that they appear in the document:

Section	Discussion
2.	<p>While the policy speaks to the actions and activities of all sectors of the South African society taking part in the “<i>effort to mainstream climate-resilient development</i>”, it is urged that this response strategy not consider sustainable <i>development-related</i> issues in isolation. The response strategy should target all activities across all sectors (targeting all relevant aspects of ‘business as usual’), aiming to modify all behaviour, business and regulation towards climate resilience, without an exclusive focus on new developments.</p>
3.	<p>We fully support the principles upon which the White Paper is based.</p> <p>However, we are concerned about the re-definition of some of these principles in the progression from the Green Paper to the White Paper. The definition of <i>informed participation</i> in the Green Paper was articulated as “<i>the enhancement of the understanding of the science of climate change, information streams and technology to ensure citizen participation and action at all levels. The participation of all interested and affected parties must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation. Participation by vulnerable and disadvantaged persons must be ensured</i>”. In the White Paper this has been significantly truncated to “<i>enhancing public awareness and understanding of climate change causes and impacts to promote participation and action at all levels</i>”.</p> <p>This simplification has resulted in the loss of some of the most essential content of this definition. There is a risk that this may constrain stakeholder participation, and reduce the opportunity for meaningful cooperative governance. Co-operative governance must include the collaboration between public and private sectors, <i>and</i> civil society in decision-making around our natural resources in an effective, transparent and accountable manner, by definition. The section as it originally stood in the Green Paper</p>

	<p>was an inclusive and clear-sighted approach to the issue that included direct citizen participation, and it is strongly recommended that the definition of this principle reverts to this more inclusive and faithful definition of public participation in cooperative governance.</p>
5.3	<p>We remain seriously concerned about the over-simplification of the role of timber afforestation in climate change mitigation strategies, and reiterate our comments made on the Green Paper.</p> <p>The influence of climate change upon natural forest habitats, and timber plantations cannot be allowed to overlap, as they cannot be considered to be synonymous in their responses to climate change, or their role in climate change adaptation and mitigation strategies.</p> <p>The potential role of the timber industry in climate change adaptation and mitigation cannot be reduced to an assessment of the growing of trees, and thereby harnessing their carbon trapping abilities. This narrow definition of timber afforestation is deceptive. By focusing solely on tree-growing, it overlooks the harvesting of the trees, and the processing of timber products (which is energy intensive, water intensive, and which generates significant emissions of GHGs and large volumes solid and liquid waste). The separation of tree-growing from these industrial activities is artificial, and the timber industry taken as a whole is therefore a far more carbon intensive activity than the policy suggests. The integration of forestry into rural development planning must account for these factors, and the other externalities associated with timber afforestation in order to avoid unexpected impacts upon our most vulnerable communities, especially poor and/or rural women.</p>
5.3	<p>It is strongly recommended that the benefits of permaculture/ecological agriculture be specifically highlighted and promoted in the policy. These agricultural models have high potential for addressing the objectives of the climate change response strategy, as well as providing for sustainable livelihoods through job creation and other benefits.</p>
5.5	<p>We fully support the inclusion and articulation of the Ecosystems Based Adaptation approach.</p>
5.5.1	<p>We fully support this response. Reference is made to the comments in section 2 above.</p>
5.5.6	<p>Given the clear link between Marine Protected Areas and the management of sustainable fisheries, it is strongly recommended that a particular focus should be paid to the <i>Marine</i> Protected Area expansion strategy as a key mitigation against impacts of climate change upon wild fisheries.</p>
5.8	<p>This section continues to suggest that coastal defence structures are the preferred or only option for the protection of coastal infrastructure from risk and damage as a result of coastal processes, as a response to climate change projections. This is in contradiction of the phased retreat and improved planning principles of the Integrated Coastal Management Act (No. 24 of 2008). We continue to agree that coastal defence options must be considered to protect high value infrastructure that may be at risk from coastal erosion or sea-level rise, but for the remainder, the short-term opportunity cost of not developing in high risk zones, or even of relocating inappropriately located or high risk infrastructure would be far outweighed by the medium- to long-term benefits in risk abatement. The continued monitoring and assessment of vulnerable areas should inform the appropriate and most cost-effective response to minimising the risks to society as a whole.</p>
5.9	<p>The need for South Africa to re-evaluate some of our disaster risk reduction and</p>

	<p>management frameworks have recently been clearly highlighted in the coastal zone, with the recent stranding of the ship MT Phoenix on the KwaZulu-Natal coast. Seemingly as a result of government's failure to close the gaps in our legislative framework (which would have been in accordance with international best practice), South Africa, and civil society in particular, will bear the not-insignificant environmental and economic burden of this incident. This cost is substantial despite the successful implementation of available mitigatory measures.</p>
6.	<p>We reiterate that a regulatory framework to support carbon capture and storage will need to be untainted by some of the financial mechanisms currently criticized for moving money but not resulting in measurable and effective climate change mitigation. The ethical grounds of carbon trading have drawn criticism for (i) allowing the wealthy to evade their environmental responsibilities, (ii) putting a price on the environment that underpins our life support systems, (iii) unequally sharing of the benefits of emissions trading, and (iv) not resulting in reduced emissions/effective mitigation. The mitigation potential of carbon trading/offsets may present a "low cost" option, but these ethical debates will need to be addressed comprehensively and in the South African context before the potential of such a scheme could be realised. We would therefore suggest that this is possibly not a good "short-term" market-based instrument for addressing climate change mitigation; the integration of carbon trading into the mitigation strategy will need market structures that are clear, long-term and credible.</p> <p>Short-term interventions may need to rely on a pragmatic approach to budget and policy commitments at a local government level, given that the effects of climate change will be experienced at a local level.</p>
6.3	<p>We fully support the promotion of transport modal shifts towards public/mass transport and alternative fuels/vehicles.</p>
8.6	<p>It must be reiterated that the opportunities around waste management contributions towards climate change adaptation and mitigation require further attention. The only section on waste in the policy speaks to the demonstration project for harnessing greenhouse gas emissions from waste. This does not identify broader waste related issues that have the potential to directly or indirectly exacerbate climate change related impacts. In addition to the commendable harvesting of fuel gases from concentrated waste and the use of wasted by-products, the waste hierarchy should demand that our response is to first avoid generating waste, and then to recover and/or recycle. Waste must be treated as a resource and economic opportunity. Improved waste management, in accordance with the waste hierarchy, will improve energy efficiency, and minimise wasted resources, enhancing our resilience to climate change. The principle of extended producer responsibility is also highly relevant to this section, and this could be incorporated into climate change responses as well.</p>
10.2.4	<p>While we appreciate the need to structure cooperative <i>government</i> mechanisms, the IGCCC is defined as a cooperative <i>governance</i> committee, which, by definition, includes the participation of civil society. Civil society has much to contribute towards the exchange of information, consultation, agreement, assistance and support for government work; the objectives of the IGCCC. It is therefore of concern that no explicit provision has been made for the inclusion of civil society in the deliberations and decision-making around the implementation of the climate change response strategy.</p>
10.7.1	<p>We are concerned about the first paragraph of this section. The opening statement is ambiguous and it is unclear as to whether this is considered a true statement, a perception, or a previously held perception that is now held to be untrue. We would suggest that the economic model(s) classifying environmental resources as a "<i>public good ... accessible by all and [that] can be consumed in infinite quantities</i>", are both</p>

	out-dated and incorrect. We would argue against an economic model that considers the environment as an infinite resource well, for reasons far too well known to be worth repeating here.
10.7.1	WESSA supports the carbon tax policy and its roll out. However, it is a concern that the policy recognizes the externalities of GHG emissions, but the emissions pricing system would only partially cover these externalities. There is a risk that the increased cost of doing business as a result of the carbon tax roll out would be passed on to the consumer and civil society, while at the same time allowing civil society to continue to bear the environmental costs of the GHG emissions where they are not internalized through the carbon tax or cleaner production mechanisms. In fact, with the publication of the White Paper earlier this month, initial responses confirm this (for example, Eskom's statements reported in <i>The Mercury</i> on 21 October 2011, in the article titled " <i>Carbon tax will hit consumers</i> ", by Melanie Gosling). It is imperative that the carbon tax policy cannot result in the wealthy evading responsibility while costs are paid by the environment and civil society.

4. CONCLUSION

In conclusion, we once again wish to fully endorse the policy pledge articulated in this White Paper, and congratulate the Committee on addressing this challenge with gravity and insight.

We look forward to the finalisation of the policy, and the advancement of South Africa's response to climate change. We encourage continued open discussion and dialogue around climate change related issues leading up to COP 17 and beyond.

We wish to acknowledge the continued support of our members, staff and volunteers whose collective knowledge and experience provide the foundation for our work.

Should you have any queries regarding any of the comments raised above, please do not hesitate to contact us.

Yours sincerely,



Bianca McKelvey
 Conservation Manager
 KwaZulu-Natal Region
FOR: WESSA