



RAND WATER

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Parliamentary Monitoring Group
2nd floor, 1 St Johns Street
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Attention Ms Madubela

Dear Madam

RE: COMMENTS: NATIONAL CLIMATE CHANGE RESPONSE WHITE PAPER

1. Introduction

- 1.1 Rand Water hereby wishes to commend the government of the Republic of South Africa in coming up with a visionary white paper that provides for the Republic's response to climate change.
- 1.2 Rand Water commits itself to align its own business planning processes with national policies and strategies. That process has just started in Rand Water. Rand Water has embarked on a process to develop a climate change strategy which unpacks Rand Water's response to climate change by developing risk mitigating factors.

2. Background

- 2.1 Rand Water is a major role player in the water sector. It is also situated in the location where most of the water used within its systems has to be brought into the Gauteng region. Once received by Rand Water it is purified and pumped at great cost over a distance of more than

300km (in some cases). The role that is played by Rand Water with regards to environmental management of infrastructure and Water Conservation (through the Water Wise brand) is significant within the water sector of South Africa. It is with this in mind that certain key issues are raised with regard to the National Climate Change Response White Paper.

2.2 Further, by nature of Rand Water's service, it needs to sustain its performance by monitoring its water quality. Pollution of the water resources compounded by climate change has an impact on its business.

2.3 On the basis of the aforementioned, please find Rand Water's comments hereunder

3. Comments

3.1 Adaptation – Water Item 5.2 of the White Paper

3.1.1 The White Paper indicates that climate change poses a significant risk to water security and that in turn has a knock on effect to various sectors. It is felt that the ornamental Horticultural sector will also be significantly affected (due to the potential high water use) and as a result should be included. The ornamental horticultural sector uses in excess of 35% of all domestic water.

3.1.2 In addition, item 5.2.1 should include the ornamental Horticultural sector.

3.1.3 Due to uncertainty in future climate trends, RSA needs to emphasize on prohibition of activities that would compromise the water quality and quantity. The White Paper does not say much on water quality and water quantity issues. Pollution of the water resources has a negative impact on the already impacted water resources due to climate change. The Climate change s affect the availability of water (drought). As a result, there is no enough quantity of water in the resource to enable the resource to naturally balance the anthropogenic pollution. Therefore, the adaptation approach in the White Paper Item 5.2.4 should be expanded to include water quality as a measure to adjust the impact of Climate change on water resources.

3.1.4 We suggest that a new sub-clause-5.2.9 be added in item 5.2. Climate change s may cause floods. The White Paper is vague or not providing enough information on infrastructure development as a way to adapt to climate change. It only provides for practices to ensure a greater degree of water security. Infrastructure development and refurbishment is key in addressing water security and risk associated with water loss or floods.

3.2 Adaptation –Health Item 5.4 of the White Paper

Item 5.4.7 refers to significant long term impacts of DDT on the environment. Firstly DDT should be eliminated as its effects are negatively harmful to the environment, and secondly

should DDT be used in areas where it is has historically not been used, it could start impacting on water resources. We strongly suggest that it be removed.

3.3 Adaptation – Human settlements –Urban settlements Item 5.6 of the White Paper

3.3.1 Due to changes in land use, water runoff and changes in rainfall patterns, it is not just informal settlements that are vulnerable to floods and fires, but also more “affluent” areas. Examples are flooding in Soweto, Vereeniging (Sedibeng) and fires in the Western Cape.

3.3.2 This section should contain a response that South Africa will engage in prioritized education, training and public awareness programmes to build the general public awareness of water conservation in the urban environment.

3.4 Near-Term Priority Flagship programmes – The Water Conservation and Demand Management Flagship programme item 8.2 of the White Paper

Reference is made to the fact that rain water harvesting tanks in rural areas must form part of the programme. It is felt that the programme should include urban settlements as well to offset a potential water crisis.

3.5 Mainstreaming climate resilient development item 10 of the White Paper

3.5.1 Item 10.1 and 10.2 Policy and planning review and roles institutional arrangements:

3.5.1.1 SA has tools in the form of legislation to compel adherence to environmental initiatives. A few examples are the Water Resource Management Strategy, National Water Act, and NEMA.

3.5.1.2 The white paper further affirms SA's position with regards to the polluter pays principles. In practice, we do not see much of institutional support in the area of policing and enforcements. At times, political issues prevent intervention where the environment is degraded.

It will be best if the role of the institutional arrangements is clearly defined in the White Paper. An independent institution for the monitoring of climate change on water related activities should be provided for. The independence of the institution is key to the successful implementation of the strategies contained in the White Paper and the plans.

3.5.2 Item 10.2 providing for roles institutional arrangements

Water utilities have a direct interest in climate change and this does not necessarily ignore other role players. We provide an essential service and its depletion might result in consequences that may be untenable. It is suggested that there be more focus given to collaboration between different government departments and water utilities, as collaboration

can generate synergies that enhance the adaptive capacity of organizations within a specific sector to adhere to climate change requirements.

3.5.3 Item 10.7.3 providing for incentives

3.5.3.1 The introduction of new legislation and regulations poses the most common risk to businesses. The requirements for reporting reduction in emissions can increase operating costs with higher energy prices filtering to the end user / consumer alternatively deterring investment.

3.5.3.2 Government must give the commitment that any revenue raised by carbon taxes will be directed back to environmental initiatives.

3.5.3.3 Rand Water currently as a State owned Enterprise is not subject to tax. Should tax incentives be granted to companies for carbon taxes, Rand Water will not be entitled to the same deductions. Some consideration will need to be given to this type of scenario together with the issue of escalating costs for the end user consumer.

4 Conclusion

We hope the above mentioned comments will be considered. Rand Water hereby extends its gratitude for allowing it to submit the comments on 4 November 2011.

Yours faithfully



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RAND WATER