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FINAL

SUBMISSION ON THE NATIONAL CLIMATE CHANGE WHITE PAPER

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To: Chairperson : Environment and water Affairs  
Parliament of South Africa  
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The Climate Change White Paper has received a cautious welcome from the faith communities.

The final gazetting of the White Paper is the end of a 2 ½ year process of policy formulation. The early stages of the policy formulation appeared to be favouring large corporates and a business as usual approach with people and the planet far behind, but the final version is something we, in the main, can support.

However, we feel it is imperative to comment on the consultative process of the latest round of consultations:

Stakeholder engagement is a key part of delivery ensuring transparency, and accountability. It is our contention that to provide such a short time for comment undermines the quality of such participation and compromises the ability of parliament to obtain the views of all stakeholders.

The parliamentary consultative process is therefore restricted to the elite NGOs and specific institutions that are well resourced and technically capacitated. We would also like to point out that in our submission on the green paper, we outlined the compromised manner in which the climate change policy public consultation process has been run to date. It is therefore disquieting to see parliament not only continue with non-participatory processes but exacerbate their failings.

*We believe that any climate change policy process must enable civil society participation. As all citizens will be impacted, with those poor and vulnerable communities generally less able to participate in formal policy processes, we believe that in this case, special logistical arrangements must be put in place to enable everyone to have their say. How we adapt and address climate change will have far reaching impacts on our children and their children. Such decisions cannot be left to a small elite in their boardrooms and government corridors. (submitted to Dept of environment as part of our submission of June 2009, and again as part of our submission to the Green Paper in 2011).*

Despite our serious objections to this non-participatory parliamentary process, as one of the more resourced institutions, we have prepared some commentary on the Climate Change White Paper.

At the green paper stage, SAFCEI provided 18 pages of critique as part of our constructive engagement with the climate change policy process.

At this stage, we could have provided 20 pages of areas where we feel that the White Paper should be lauded in its approach and we acknowledge that many of our issues have been addressed.

In the past, the "business as usual" approach to development has trampled the rights of people to a healthy living environment, and the Environment portfolio in government has always been the Cinderella department, unable to exert much influence on its carbon hungry larger sisters.

This white paper appears to signal an acknowledgement that government needs to act together and to act with all stakeholders in the interests of a healthy ecosystem. Such a system will then be able to support people sustainably and address poverty.

We take this opportunity to congratulate the department on the achievement of a White Paper that could take us down a road towards addressing climate change in a meaningful manner.

However, there are a number of key issues where we are concerned that the White Paper has failed us. On the understanding that these issues could even, at this late stage be addressed, we submit the following short commentary.

#### **Section 5 – adaptation**

Water – it is now recognised that groundwater and surface water are not separate entities and the underground flows of water and the relationship between groundwater and salt water in coastal areas is a delicate one. We understand that over extraction of groundwater can have devastating environmental consequences, for example, the ingress of sea water into groundwater aquifers that coastal populations might rely on.

We welcome the integration of climate change into departmental plans and hope that due cognisance will be taken of the futility of building large expensive dams in a climate where evaporation rates will increase, rainfall will decrease and such dams will never reach their full potential, or where excessive runoff will silt up the dams, shortening their life spans.

We are also pleased to see that the outrageous idea that we should reserve clean water to dilute our pollution has been removed from this white paper.

#### **Section 5 (page 17)**

We believe that food security is a fundamental responsibility of government to its people. It is therefore not sufficient to “promote” food security, but rather to “ensure” food security.

There is clearly a need for the agricultural sector to adapt to produce food and other agricultural crops under a changing climate regime. However, we would reject the use of GM crops and would also caution government to ensure that biofuels projects do not compromise food security and other aspects of rural livelihoods such as access to grazing land and traditional medicinal plants.

#### **Section 5 (page 20)**

There is an implied arrogance in the approach to natural systems that we would caution against. Given the extent of likely climate change in Africa, we believe that it would be foolhardy and arrogant to attempt to guess at which ecosystems might improve resilience and therefore ignore or destroy others. It would be preferable to acknowledge that restoring and maintaining the balance of nature is fundamental to human survival and that all ecosystems should be regarded as conservation worthy.

Within urban settlements, it is important to acknowledge that the rehabilitation of existing natural systems within urban areas are an important part of building climate resilience – urban gardening, greening of open space, trees for shade, rivers and wetlands for flood attenuation, roof gardens for home grown vegetables, and rules that limit hardening of surfaces in urban areas (increasing hardening of surfaces leads to increase stormwater runoff, less absorption of water into the soil and leads to the need for increased investment in stormwater infrastructure, flood damage control).

Disaster Management: the idea that local communities are empowered to respond to disasters and to move from feeling like victims to become climate resilient is welcomed. However the issue of micro-insurance is not supported without further information.

Insurance places the burden of paying for the impacts of disaster on to the victim of the disaster. Such victims are poor, cannot afford insurance and it is moral dubious to expect them to pay for disaster impacts that were not of their making. Rather than such market mechanisms that discriminate against the poor, the state should have a fund against which all disaster victims can claim.

#### **Section 6 - mitigation**

This white paper appears to signal an acknowledgement that government needs to act together and to act with all stakeholders in the interests of a healthy ecosystem. Such a system will then be able to support people sustainably and address poverty. Specifically section 5.9.6 indicates that non-governmental organisations have a role to play and given that many South Africans are people of faith, we believe that the faith communities should be specifically mentioned here.

We are specifically pleased with clause 6.6 which speaks to all government departments and sectors of the economy being forced to bring their policies and programmes into line with the white paper within the next two years (section 6.1.2).

We support the carbon budget approach but emphasise that this must support an equitable system of allocation both nationally and internationally.

We would support the following paragraph and emphasise that this must be acted on as a matter of urgency:

*Policy decisions on new infrastructure investments must consider climate change impacts to avoid the lock-in of emissions-intensive technologies into the future. However, in the short-term, due to the stock and stage in the economic lifecycle of existing infrastructure and plant, the most promising mitigation options are primarily energy efficiency and demand side management, coupled with increasing investment in a renewable energy programme in the electricity sector. In addition, in the short term, the emergence of bio-fuels and a suite of non-energy mitigation options, such as afforestation, are also important.* (page 26)

Given the paragraph above, it is imperative that the IRP2010 be reviewed in order to avoid infrastructure lock-in. The recent press coverage around the proposed R1 trillion rand nuclear expenditure in the light of Fukushima and other nuclear incidents this year is alarming as it demonstrates a reckless disregard for the risks of nuclear energy.

We reject the use of nuclear energy as a climate change mitigation strategy. We have a sound rationale for this rejection and would provide further explanation if asked.

The IRP2010, by its own admission, did not provide for sufficient energy efficiency and this should form one of the main legs of the Government's actions from now on. However, we would like to see the wording shift from encouraging or facilitating language to a more mandatory approach. As we pointed out in our input into the green paper:

*It should also be clear that high carbon sectors have had years to understand the necessity for change. There have been 16 annual intergovernmental negotiating meetings that have attempted to reach consensus on addressing climate change. Our focus and priority must be on mitigating climate change and we cannot be held to ransom by high carbon sectors who appear to have ignored climate change for years, continuing to reap profits from exacerbating the climate problem (SAFCEI input to Green Paper Feb 2011).*

We would also caution against the use of biofuels (refer to comment re biofuels in the adaptation section above)

We welcome the specific mention of empowerment of communities whose capacity would be built to enable them to adapt to climate change and take mitigation actions as appropriate themselves.

The Energy sector is the greatest contributor to carbon emissions in South Africa, both in fuel and electricity. In responding to the overall approach to mitigation (page 24), faith communities believe that the government target reduction is not sufficiently detailed as it fails to define the baseline from which reductions will start. It is also of concern that South Africa still claims carbon space to increase carbon emissions until 2020. We believe that while other African countries would need to increase their carbon emissions to address the millennium development goals, South Africa must act responsibly and act now – aiming to reduce emissions much sooner. We support the Earthlife Africa Johannesburg submission that demonstrates that the peak, plateau and decline trajectory, if applied to all other countries, would not bring us to an emissions limit to prevent a 2 degree rise in temperature, and that an emissions reduction trajectory in line with science must be applied.

The White Paper speaks of emissions trading and carbon tax as essential to driving mitigation efforts. However, the major gains of carbon trading to date appear related to the enrichment of consultants, and the increase of emissions – something we believe is not in the national interest. Carbon tax appears to be a great idea in principle but its impact on the poor has not been calculated and further research is needed before implementing it. It is important to note that a tax on carbon intensive businesses (those that use Eskom electricity for example) would be passed on to consumers. Clothes, processed

food etc would increase in price. It is simplistic and naïve to assume that one can avoid impacting the poorest of the poor by increasing the free basic electricity when many of these households do not use electricity, and electricity cost increases will be a small part of the economic hardships they suffer!

Carbon capture and storage are a false solution to climate change – the technology does not seem to be viable at present and renewable energy solutions (including biogas and combined heat and power plants) would seem a better option.

Page 27 – The idea of working out which combination of options would be best to achieve the most mitigation is a good one but we would like to state that indicators of social well-being should be included in the assessment criteria (alternatives to GDP).

Page 27 – the peak plateau and decline trajectory:

Safcei would support a lower limit of peaking at 398 Mt and declining to 212Mt by 2050. However we believe that we should start sooner and peak sooner and not wait until 2020.

Section 4 defines short term as 5 years. We would submit that although this might a pragmatic approach, climate science is telling us that we don't have a moment to lose and we need to act with more urgency. We would therefore like to see a prioritisation of actions that are necessary within 6 months to a year.

There is some mention of near-term priorities that appear to have a two year time-line but it would be important to spell this out in departmental implementation programmes and such programmes must be integrated within the budgetary allocations from 2012 onwards.

6.5.5 – business and labour are not the only stakeholders that must be consulted. With mounting unemployment and a range of civil society organisations well informed about socio-economic development issues, consultation must include civil society stakeholders and not only business and labour.

Section 7 (page 30) – we would caution against the criteria of international competitiveness. Countries regarded as “internationally competitive” often have a poor human rights record and a high level of environmental damage due to their unwillingness to provide decent working conditions or install environmental safeguards. We do not believe that South Africa should compete in such a race to the bottom.

### **Section 8 – flagship programmes**

This section is disappointing and illustrates the key weakness of government implementation.

The “flagship” programmes appear to be a parroting of existing programmes and sadly, they appear to be a public relations exercise that would see government claiming successes without substance.

The use of the word “facilitate” fails to answer the question of “how” these projects would be fast-tracked.

### **Section 9.2 policy instruments:**

The National Employment Vulnerability Assessment (NEVA) and the Sector Jobs Resilience Plans (SJRP) need to also highlight how women are disproportionately affected by climate change and the SJRP's should therefore include specific actions to empower women.

### **Section 10.2**

Carbon trading and off-set schemes have thus far failed to mitigate climate change and research shows that since the implementation of these schemes, global emissions have risen. We would therefore ask that a serious review of all carbon trading and off-set schemes be undertaken. We do not believe that the market can fix climate change, and we believe that focusing on such schemes is a dangerous distraction from implementing real change.

### **Section 10.4 coordinating mechanisms**

We wish to express out dissatisfaction with the manner in which the NCCC has operated to date.

this. Success in the implementation of this policy paper will depend on strong transparent accountability mechanisms. In this regard, the faith communities call on parliament to strengthen its oversight role.

In this regard, we would like to refer to our inputs to the Green Paper. This white paper has taken a more systematic approach but lacks detail in many of the sectors. We would therefore include our comments on the Green Paper process as part of this submission and request that those comments be considered in further implementation of the White Paper (attached as appendix).

In order to overcome climate change challenges, much more than paper is needed – the opportunity is right now, the future of South Africa and other countries to the north is at stake. South Africa needs to ensure meaningful progress both internationally at cop17 and at home through implementation of the white paper.

We offer these comments in the spirit of constructive engagement.

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