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### *RECOMMENDATIONS*

- 1. The White Paper should clearly set out both the emissions pathway and the carbon budget for a global temperature rise of 1.5 degrees Celsius and endorse such as the target for global emissions. This will mean, without a doubt, a global peak in temperature in 2011 and/or 2012. It may be possible to have a global peak post-2015, but this will require very steep declines afterwards. A global peak post-2020 is highly unlikely to be successful.*
- 2. As a point of reference, the White Paper should also clearly set out the emissions pathway and the carbon budget for a rise of up to 2 degrees Celsius.*
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- 6. In defining internal carbon budgets for entities within South Africa, Parliament should put in place an enforcement strategy for non-compliance.*

7. *While a carbon tax is necessary, Parliament should not allow the electricity generation and liquid fuels sector (in particular Eskom and Sasol) to pass through the carbon tax onto consumers.*
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*Conclusion:*

*Parliament should not allow state funds (including from the carbon tax) to be allocated to new nuclear power plants.*

## Comments on the National Climate Change Response White Paper

Off The Ground Foundation Alexandra

21 October 2011

Contacts: Nomalizo Xhoma

Coordinator

Address: 46 - 7<sup>th</sup> Avenue Alexandra Township JHB

Cell No. 076 246 0352

This National Climate Change Response White Paper [hereafter "White Paper" ] is much improved over the Green Paper of earlier this year. Notably, the exclusion of nuclear power from the document, the addition of numerical values for mitigation targets, a carbon budget approach, and a commitment to keep, "well below a maximum of 2°C above pre-industrial levels" .

While these are significant improvements, the main areas for further improvement lie in these four areas. In particular, the numerical values of the mitigation targets are not in line (at least in a large part) with either national or international research on what is required to avoid catastrophic climate change and to keep well below 2°C. In effect, while giving a carbon budget for entities within the Republic, the White Paper ignores the fact that South Africa as a whole needs to take on a constrained budget itself in line with the latest scientific wisdom.

However, before getting into the issues, Parliament's incredibly short notice of only eight days is entirely inadequate and hardly allows citizens of this country sufficient time to engage meaningfully with the White Paper. Nor, we imagine, does it give Parliament time to debate and consider the White Paper to the best of its ability.

Furthermore, Parliament, under the Bill of Rights' Section 24 of the Constitution, is specifically mandated to ensure that the citizens of this country have a clean, safe and healthy environment. This should be the primary rule under which Parliament engages with the White Paper. Accordingly, Parliament cannot but overrule, reject, adapt, amend, or otherwise alter the White Paper if the Constitutional rights of the citizens of South Africa are likely to be infringed upon by the White Paper. A country that is blighted by the consequences of unmitigated global warming will not be a clean, safe or healthy environment for South Africans to live in; such a situation would be a complete and utter violation of the Constitution and an abject failure of all organs of the state to rule in

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Therefore, Parliament must not only ensure that this White Paper achieves South Africa's emissions reductions in line with the best scientific wisdom globally rather than political expediency, but must also ensure that the executive is given the appropriate direction through the White Paper to adopt a negotiating position at the UNFCCC to reduce global emissions substantively according to a global carbon budget

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