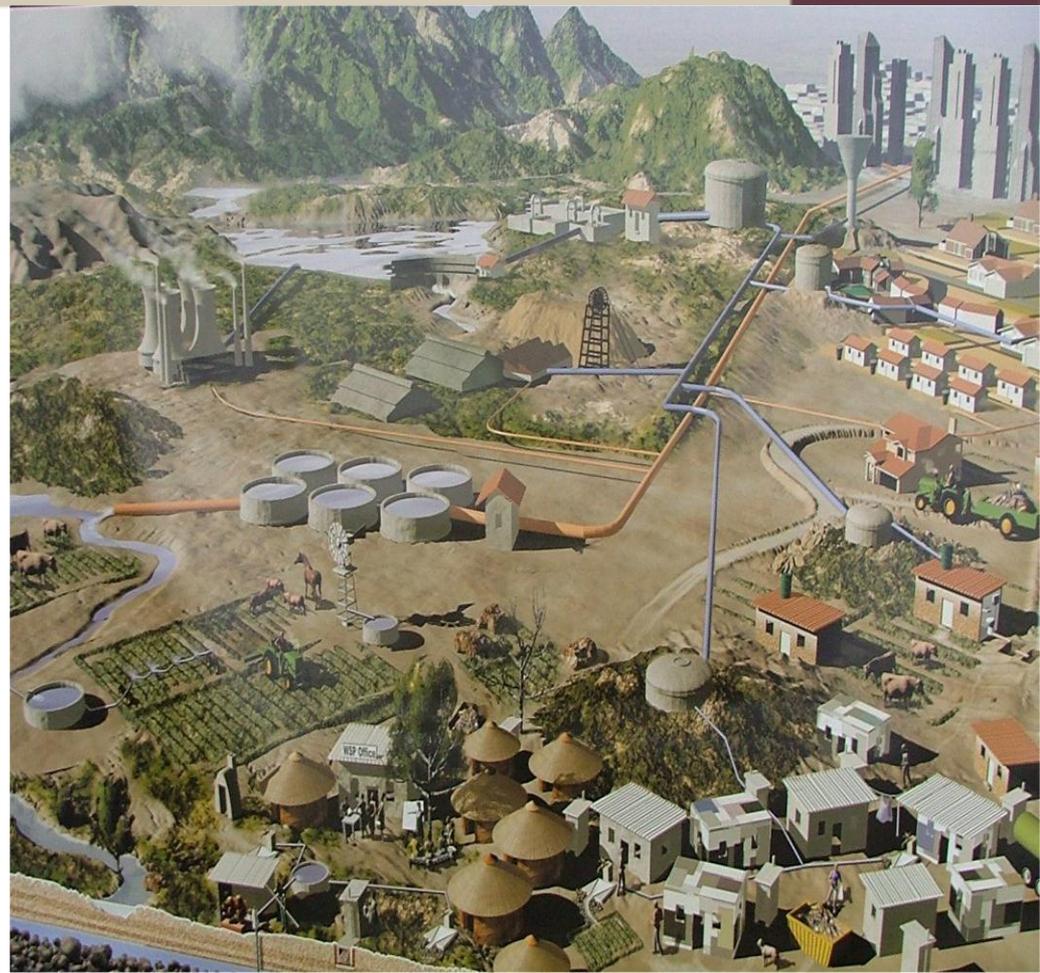




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**INITIAL COMMENTS TO
THE PORTFOLIO COMMITTEE ON WATER AND
ENVIRONMENTAL AFFAIRS ON THE NATIONAL WATER
RESOURCES STRATEGY -2
29 OCTOBER 2012**





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Acknowledgement

- ❖ May we acknowledge the efforts and time that DWA as the custodian of the Water in South Africa has put towards the development of the draft strategy and the quest to solicit comments towards shaping a better future of water management for all





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Context

Why does LG have interest in Water Resources Management

- ❖ Is primarily related to the interface with water services provision i.e. source to tap principle
- ❖ Properly managed water resources provide a source for local government water supply services
- ❖ water resources such as rivers are widely used to dispose of the waste from local government sanitation services.
- ❖ local government must be concerned about environmental protection as well as about the importance of water resources and their management to support local economic and social development.



Context

The National Water Act 1998 (NWA) outlines the purpose of the NWRS. It:-

“... requires the **progressive development**, by the Minister, after consultation with society at large, of a national water resource strategy. The national water resource strategy provides the framework for the **protection, use, development, conservation, management and control of water resources for the country as a whole.**

provides the framework within which water will be managed at **regional or catchment level, in defined water management areas.** The national water resource strategy, which must be formally reviewed from time to time, is **binding on all authorities and institutions exercising powers or performing duties under this Act.**”

The Preface to the NWRS2 confirms this framework and states that:

- ❖ The NWRS is the legal instrument for implementing or operationalizing the National Water Act.
- ❖ It is crucial that the NWRS is recognized as the primary mechanism to manage water across all sectors towards achieving national government’s development objectives.”



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Emerging Theme

Two key themes:

- ❖ mobilise water and its management as an instrument to promote equitable social and;
- ❖ economic growth and development and to promote SMART water management approaches.

Gap

However, NWRS2 lacks details in particular on the institutional and financial approaches that will be taken to achieve the above. This is particularly the case in areas of interest to local government.



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Initial Comments

Table 2: Progress with the implementation of the NWRS 1

Successes in implementation	Weaknesses in implementation
<ul style="list-style-type: none"> • Sustaining reliable supplies • Development of water resources infrastructure • Improved insights in future water demands and supplies • Increases in environmental flows 	<ul style="list-style-type: none"> • Limited implementation of Water Conservation and Demand Management • Limited implementation of Water Allocation Reform to redress past racial and gender imbalances in access to water for productive uses • Inadequate establishment of water management institutions and decentralisation of water management • Inadequate regulation of Water Resources and compliance monitoring enforcement • Shortage of technical and management skills to implement the National Water Act • Poor integration of monitoring and information management



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Initial Comments

- ❖ The **lack of information about water resource availability** (which will have changed since 2004 due to the construction of new infrastructure) or about the potential to increase it and any investment plans to do so will impact on municipalities which need information for water services and development planning. (This issue was discussed and resolved at the National Conference)
- ❖ The absence of **information on water use trends**, which makes it difficult to determine whether a “water crisis” may be emerging where water demands exceeds supplies.
- ❖ A similar lack of information on **water quality trends** makes it impossible to assess whether poorly managed municipal wastewater works are “A key contributor to the deterioration of water quality” as the NWRS claims.
- ❖ It is stated that the number of CMAs (the bodies through which local government would be able to participate in water resource management) will be reduced from **19 to 9**. Although this issue is officially still open for consultation, **information in the NWRS2 is based on the assumption that there will only be 9 CMAs each covering a much larger Water Management Area (WMA) and larger population than previously.** This will mean that individual municipalities will have a weaker voice in local water resource management.
- ❖ The definition of **regional resources and regional bulk** water services is necessary - What does this mean for municipalities that are providing bulk services to a number of Water Service Authorities?



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Initial Comments

- ❖ It proposes to reduce the reliability of water supplies in order to achieve “equity” in access to water resources – defined as water for irrigating crops or water for a business or an industry. This could create major problems for local government at all levels
- ❖ It proposes to promote “multiple-use systems” to supply both domestic and “productive” water. This could require local government to substantially increase the volume of water supplied through distribution networks without clarity about where the raw water will come from nor how the expanded services will be paid for.
- ❖ There is considerable emphasis on water conservation and demand management (WCDM) and it is indicated that in many areas there will be “no new water”. However, no detail is provided on the proposed programme to promote WCDM in municipal services
- ❖ The document acknowledges that 60% losses are occurring in the agriculture sector but there is no reduction target for this sector. All sectors should have water loss reduction targets.



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Initial Comments

- ❖ It is stated that the existing 12 water boards will be consolidated into 8 by 2016. this process is still under discussion. Although water boards are not strictly a matter for the NWRS (they are established under the Water Services Act) they are important institutions. It is stated that “The water boards will also play a strong role in supporting municipalities through their secondary activities by providing services on their behalf and/or providing services to municipalities in terms of contracts
- ❖ While the NWRS2 emphasises that water must be central to development planning, it gives little attention to Local Government’s Water Services Development Plans (WSDPs) and IDPs which will be the key interface between the management of water resources and the provision of water services.
- ❖ The mechanisms that effectively ensure that water is central to integrated planning are not clear in the strategy. The strategy should elevate the water debate and importance in development planning to the level that environmentalists have achieved.
- ❖ It states that “at local government level, failure to plan effectively to determine water resource requirements as well as to provide for effective wastewater treatment has serious implications for water management“ but makes no concrete suggestions on addressing this challenge.



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Initial Comments

- ❖ Although **institutional and financial** issues are raised as key concerns, there is little discussion about options and approaches to be taken except to review current approaches. The financial implications for local government of the large proposed investment plan thus remain unclear. So too are implications of proposals to retain existing divisions between the Departmental Infrastructure Management Unit and the TCTA which promotes large projects that are funded “off-budget.
- ❖ One example of absence of **strategy is in relation to wastewater treatment**. The draft strategy (Technical Strategy 1: Infrastructure Development and Management) simply says that a strategic action is to “Improve maintenance of municipal wastewater treatment infrastructure and groundwater supply systems” with no indication of how this is to be done.
- ❖ *“by 2019, DWA will put in place a system for the effective collation of data from a range of water institutions including CMAs into an easily accessible national water resources information system, will develop a data sharing protocol and will set national data standards;”* - Availability of **information is the hub for all other decisions**(e.g. setting targets for water conservation, water allocations, resources availability).



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Other related matters

- ❖ Climate change was not viewed as a particularly high priority in the NWRS1 which simply committed the DWA to maintain a “watching brief”. In NWRS2, a commitment is made to finalise the Water Sector Climate Change Response strategy. **Activities such as water planning, infrastructure investment, risk and disaster management as well as outcomes based development must be more robust and focussed.** Appropriate monitoring, especially of rainfall, and rigorous analysis of this data, is required before **very expensive infrastructure is built for mitigation**”
- ❖ With the exception of the impact of alien vegetation on water resources, limited attention is given to **ecological infrastructure as an alternative to conventional infrastructure**. The “core strategy” dealing with the protection of water resources mentions the “ecosystem services” provided by a protected resource but provides few concrete examples
- ❖ In the area of water conservation and demand management as well as in the area of water resource planning, the NWRS2 does not reflect on the approach taken in NWRS1 nor the progress made since 2004. The major change is that DWA will set the targets for WCDM loss reduction whereas, in NWRS1, this was to be done by municipalities and only reviewed when they applied for water abstraction licences
- ❖ The “strategic actions” proposed in NWRS2 for WCDM duplicate in many respects those of NWRS1 8 years previously. There is no indication of what has happened in the interim, what successes were achieved or difficulties encountered. As a result it is not clear whether the target established for 2014 can be achieved or what will be required to achieve it



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SUGGESTED RECOMMENDATIONS

- ❖ The need for **adequate information about trends, in particular of water availability to and use by water services providers**. Information is also needed about water quality trends to enable local government to evaluate the impact of poor wastewater treatment management and inform its response strategies
- ❖ The need to recognise and use the process of preparing the **WSDPs** as the opportunity for municipalities to engage with water resource issues cannot be over emphasised
- ❖ Proposals to reduce the reliability of water supplied, in order to make more water available for allocation to historically disadvantaged groups is cause for concern - focus should rather be on **compulsory licensing to reallocate water** in an organised way while maintaining reliability of supplies.



SUGGESTED RECOMMENDATIONS

- ❖ The importance of WCDM is acknowledged by SALGA. However it would be appropriate to ask what **measures are proposed to support local government in its efforts to achieve loss reduction and how licence restrictions on water abstraction will be applied in the absence of such support**
- ❖ Proposals for **multiple use** will have major implications for SALGA members since they are likely to encourage the use of potable water for purposes such as **home garden irrigation** before additional capacity is available. This will cause shortages elsewhere in the systems
- ❖ SALGA should ask for urgent clarification of these **proposals, specifically , how much additional capacity will be required**, how it is to be funded and how areas to benefit from such initiatives will be identified
- ❖ The absence of clarity on **financing issues must be clarified** - at present, operation and maintenance costs for water resource schemes are supposed to be covered by water use charges. If these are inadequate and are to be increased, will SALGA members be assisted to meet the increases?



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Concluding Remarks

In Summary

- ❖ The document addresses 11 core strategies,
- ❖ 7 technical strategies,
- ❖ 4 enabling strategies and
- ❖ 4 governance strategies.
- ❖ In addition, it contains an extensive, sometimes duplicated, list of 79 key strategic activities that are to be undertaken in the next five years
- ❖ With a focus on **26 separate strategies and 79 activities**, the NWRS2 could be described as a “strategy to develop strategies”.



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Concluding Remarks

- ❖ The document structure is such that it is repetitive making it difficult to read and follow. It needs cleaning up and re-alignment of chapters.
- ❖ Without further clarification, simplification, prioritisation and sequencing, it is difficult to determine in which direction NWRS2 will take DWA and the Country
- ❖ Given the many different initiatives and focus areas proposed and the acknowledged capacity limitation, if approved in its present form it would most likely lead to paralysis or at the least to a lack of direction
- ❖ The focus of SALGA's comments are therefore to request on the need for greater focus, prioritisation and clarity.



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THANK YOU