

18 October 2012

Comments to the Portfolio Committee on Water and Environmental Affairs on the National Water Resource Strategy (NWRS-2)

To: Ms Tyhileka Madubela, Committee Section, Parliament
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These comments are in response to the invitation from Adv Johnny de Lange, Chairperson of the Parliamentary Portfolio Committee on Water and Environmental Affairs issued on 28 August.

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Introduction

EMG is an independent, non-profit organisation established in 1991. We have played an active, leading role in water-related civil society over the last decade, with a particular interest in the relationship between water and climate change from a social and environmental justice perspective.

We welcome this opportunity to submit comments on NWRS-2 to the portfolio committee on water and environmental affairs. We are members of the South African Water Caucus (SAWC), a national civil society network of water activists, and helped to co-ordinate a national SAWC workshop on the NWRS-2 on the 16th and 17th of August in Cape Town. The SAWC will also submit comments to the portfolio committee. We would like to echo these comments, and make some additional points.

Comments on NWRS-2

1. Climate change is going to have major impacts on our water resources in the not-distant future. These impacts are going to exacerbate existing water scarcity. At present, water is most scarce for those who cannot afford to pay for it. It is crucial that water for people's health, livelihoods and dignity are prioritised over other human activities, so that poor people do not carry the burden of climate change.
2. In a related point, water conservation and water demand management (WC/WDM) are critical responses to water scarcity. However, in municipalities, the emphasis on cost recovery means that water demand management and debt management are conflated, and WC/ WDM manifests as punitive water restriction for poor households. In this way, the right to water is undermined. At a local level, people-friendly WC/WDM should rather involve training of artisanal plumbers for leak fixing, citizen monitoring of water services, and improved lines of communication between communities and municipal water departments.

3. Water for poverty reduction, specifically productive water for small-scale farming, needs to be prioritised. At present, many subsistence farmers do not have access to water, keeping them trapped in poverty. In some cases, subsistence farmers use their household water for irrigating their gardens and providing drinking water to their livestock, leaving them with crippling debt. The water boards are still dominated by commercial farmers, meaning subsistence farmers struggle to have their voices heard. The long-awaited CMAs (catchment management agencies) have the potential to amplify the voices and needs of marginalised water users, but this potential is far from being realised.
4. In securing new sources of water, climate change considerations must be a priority. So for example, desalination is being promoted by DWA as one of the major alternative future sources of water, but desalination is extremely expensive, energy-intensive, and produces toxic brine. All of the salt-water desalination plants built with haste in response to the southern Cape drought of 2009/10, are now decommissioned – a hugely expensive and wasteful exercise.
5. We are extremely concerned about fracking and its impacts on water. Huge amounts of fresh water are required for the fracking process – where will this water come from? Once this water is used for fracking, it is no longer available to be used as it will be contaminated with chemicals and radio-active substances. There is a high risk of contamination of groundwater, meaning the loss of even more water. The consequences for water security, food security and ecosystems will be catastrophic. As the national water regulator, DWA should play a leading role in raising these concerns, and the NWRS-2 should clarify whether in fact South Africa can afford to go ahead with fracking, given its huge water costs.
6. We are concerned about the inadequate participatory process associated with the NWRS-2. There has been poor communication about the process, but we are unimpressed by what we do know about it. There has been no attempt to translate the summary document into any language other than English, making it inaccessible to the majority of citizens. There is no information on the official NWRS website regarding meeting dates or participatory processes, yet we hear belatedly that processes are underway! The short time frame for comments and lack of any funding for civil society engagement also limit the chances for meaningful participation.

We look forward to the hearings in parliament from the 23rd October to the 2nd November. Thank you again for this opportunity.



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