



SOUTHERN AFRICAN FAITH COMMUNITIES' ENVIRONMENT INSTITUTE (SAFCEI)

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Faith communities committed to cherishing living earth.

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SUBMISSION ON THE NATIONAL WATER RESOURCES STRATEGY-2

18 October 2012

Ms Tyhileka Madubela.
Committee Co-ordinator
Portfolio Committee on Water and Environmental Affairs.
Parliament of South Africa
Emailed to: tmadubela@parliament.gov.za

Water is the source of all life, and as such, we - the Southern African Faith Communities' Environment Institute (SAFCEI) - welcome the opportunity to make input into the National Water Resources Strategy Version 2, and we request that we be given the opportunity to present our submission to Parliament.

Developmental, pro-poor approach and public participation:

SAFCEI welcomes the developmental approach of the NWRS-2 with its focus on being pro-poor, and we welcome too the emphasis on public participation and the participation of civil society organisations in the management of water resources. However, we feel that this latter point is in contradiction with the participation process in the development of NWRS-2 which has been inadequate. There has been very little opportunity to shape the development of the strategy which is vital as it will guide the strategic direction for water resources management in South Africa for the next 20 years. .

Indeed, there are indications that there has been much closer collaboration between the Department of Water and Environmental Affairs and the business sector through partnerships such as the Strategic Water Partners Network (SWPN). This is likely to

result in a Strategy that is dominated by economic interests rather than being guided by ecological constraints and social upliftment.

Stakeholder engagement is a key part of delivery ensuring transparency and accountability. It is our contention that to provide such a short time of 45 days for comment for a 300+ page document 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 elite NGOs and specific institutions that are well resourced and technically capacitated.

SAFCEI supports the key objective of NWRS-2 that water issues should be both communicated to other sectors and should be taken into account early on in the planning of other sectors.

Nexus thinking:

We believe this is of paramount importance particularly for the energy sector as it is one of the biggest users and polluters of water resources in South Africa, and includes all associated impacts on human habitats and ecosystems. Globally, there is increasing recognition of the need for “nexus” type thinking and particularly around the water, food and energy nexus. While there is some reference to the Integrated Resource Plan 2010 in the NWRS-2 this is very limited and does not take full cognisance of the water implications of the different energy sources, nor the positive implications for promoting renewable energy such as solar and wind, which have a relatively minor water footprint.

Hydraulic fracturing (fracking):

In practice, there appears little evidence that nexus thinking is being applied to the South African context. This is evidenced by the recent uplifting of the moratorium on hydraulic fracturing of fracking in South Africa. Leading South African scientists are cautioning government that fracking will lead to surface and ground water contamination through a number of avenues including lack of management and oversight capacity resulting in leaks and spillages, inadequate wastewater treatment capacity and the upward migration of deep fracking fluids. The Department of Water Affairs have been completely silent with respect to the implications of fracking for South Africa’s Water resources.

Similarly, the NWRS-2 is completely silent on the issue of fracking with no mention of gas, hydraulic fracturing or fracking in any of its pages, even in the energy section. At the same time, we are being told by other organs of State that shale gas will play an increasingly meaningful role in South Africa’s energy sector. It is clear that despite the good intentions within the NWRS-2 re public participation, South Africans are denied the right to influence government’s policy on fracking and the water use

and potential water contamination thereof. This makes a mockery of public participation in decision making, and brings into question DWA's role as the Steward of South Africa's water resources. The issue of hydraulic fracturing needs to be much more clearly incorporated into the final version of NWRS-2.

Climate Change:

The issue of climate change and its impact on water resources of South Africa are under-played in the NWRS-2. Climate change is arguably the biggest threat to human survival that we are facing and the implications for water resources are devastating – evaporation rates will increase, ground water resources will be reduced, rainfall patterns will change with most of the country getting less rainfall in the future, and there will be increasing human conflicts over scarce water resources, and increasing competition between sectors.

It is imperative that the NWRS-2 places climate change at the core of its planning for the next 20 years in terms of both mitigation and adaptation. Climate change is one of SAFCEI's key programme areas, and we have focused on building the capacity of faith communities to understand climate change, and to advocate our positions and concerns to government leaders. We made extensive comments on the National Climate Change White Paper. We believe firmly that following a fossil-fuel intensive energy programme is the wrong track for South Africa for reasons pertaining to both climate change and water protection. The IRP2010 by its own admission did not provide for sufficient energy efficiency, and we would like to see a shift from encouraging language to a more mandatory approach emphasizing the need for increasing energy efficiency which in turn will reduce water requirements.

General Recommendations:

- We caution against the use of bio-fuels as a major energy source due to its impact on food security and its high water consumption.
- We believe the NWRS-2 needs to reference the issue of bottled water. We understand that studies illustrate that it takes double to triple the amount of tap water to produce one litre of bottled water, requires large scale consumption of fossil fuels to make the plastic bottles, large scale consumption of fossil fuels to transport them and large amounts of plastic pollution which takes many years to degrade, during which time pollution of ground water resources occurs.
- The polluter pays principle needs to be enforced in South Africa and the NWRS-2 needs to clearly delineate how this will happen. This is particularly relevant for the mining and agriculture sectors. We need to learn the lessons from the acid mine drainage that has resulted from historical gold and coal mines, where the companies responsible cannot be traced. For example,

DWA needs to play a strong regulatory role wrt the Petroleum Agency SA, as this agency's function and raison d'être is to promote the petroleum industry. This is a clear conflict of interest and it is not in the public interest to allow this to continue.

- The risks of potential pollution from fracking are not acceptable to society.
- Science should inform policy and not vice versa.
- The NWRS-2 highlights the need to balance ecology and economy, seemingly forgetting that our economy depends on the wellbeing of our ecology, yet our experience indicates that the ecology is constantly eroded at the expense of the short term economic gains. The EIA system enables developers to apply for development rights repeatedly, appearing to take the attitude that eventually a decision maker will be worn down and approve the decision.
- There is a need for some areas to remain sacrosanct and afforded a higher level of protection – for instance some rivers should remain in a pristine condition such as the Doring River. The current classification system enables South African rivers to be developed according to their classification system and the requirements of the Reserve, but each river is looked at independently. Rivers need to be upgraded and rehabilitated.
- Similarly, stronger protection needs to be afforded to wetlands as we continue to see them being degraded and filled in.
- We support the focus on increasing allocations of water to emerging and household farmers, including rural women. Indeed, we would like to see the promotion of rainwater harvesting that is broadened beyond the focus on rainwater tanks but includes gardening techniques that retain water in the soil. We believe that with rising food prices, it is imperative that food security at the household level is prioritised through budget allocations and effective outreach programmes.
- Job creation is a priority and we believe that many of the renewable technologies and water conservation and demand management processes are labour intensive as well as reduce the need for water and energy in South Africa.
- We are concerned that the increasing focus on ground water extraction in NWRS-2 may lead to unsustainable use of groundwater as well as salt water ingress in coastal areas, which would result in the salinisation of ground water aquifers that coastal populations rely upon. This will be exacerbated by climate change. We would caution against the unsustainable use of groundwater and would call for a precautionary approach until the total impacts have been assessed.
- We trust that the pro-poor approach will prioritise increasing access to water and sanitation to those South Africans who remain without access. We are

concerned that despite the free basic water policy and the rising block tariff system, communities are treated differently across the country with some communities being forced to pay the entire water bill if their water use goes over the free basic amount, and other communities paying an excessively high second tier in the pricing structure. There needs to be some uniformity and guidelines for the development of a pro-poor tariff structure. In this respect, we believe that the government should consider the institution of a national water regulator, as has been done in the energy sector.

The Southern African Faith Communities' Environment Institute is an institute of people of many faiths in Southern Africa, united in our diversity through our common commitment to 'earth keeping' and to building a sustainable future for all our people. Our aim therefore is to support the faith communities in fulfilling their environmental and socio-economic responsibility. As such Water is one of our key programme areas. We believe that water is a gift that is essential to life and should be honoured, respected, and used wisely and responsibly. To this end, we thank you for the opportunity to provide written comments on the NWRS-2 and we request that we be given the opportunity to present at the Parliamentary Hearings on the NWRS-2 scheduled to take place at the end of October and early November 2012.

We offer these comments in the spirit of constructive engagement.

Bishop Geoff Davies
SAFCEI Executive Director

*"The river flowed into the sea and made its waters wholesome.
Wherever the river flows, all living creatures teeming in it will flourish.*

Ezekiel 47.8.9

وَأَلَّهُ أَنْزَلَ مِنَ السَّمَاءِ مَاءً فَأَحْيَا بِهِ الْأَرْضَ بَعْدَ مَوْتِهَا

"And Allah sends down water from the skies, and gives therewith life to the earth after its death..."

Qur'an, 16:65

*"When I see flowing water
vow with all beings
to develop a wholesome will
and wash away the stain of delusion"*

*Buddhist Purifying Vow that celebrates the purifying power of water
Translated from the Huayen Ching Scriptural Text*

"A person should not dump out water from his pit when others are in need [of the water]."

Talmud Bavli Yevamos 39