



PRELIMINARY COMMENTS ON THE DRAFT NATIONAL WATER RESOURCES STRATEGY 2

INTRODUCTION

This document serves to provide preliminary comments from the Trans-Caledon Tunnel Authority (TCTA) on the draft of the second National Water Resources Strategy (NWRS-2).

As the primary implementer of off-budget, bulk water infrastructure on behalf of the State, TCTA has a significant reliance upon the NWRS to guide its own business strategy and inform key corporate decisions. The NWRS-1 of 2004 served as a valuable source of reference and, hence, provides a benchmark for assessing the value and robustness of the NWRS-2.

Given the scope and content of the NWRS-2, vis-à-vis the limited time in which the document could be assessed for completeness and suitability, the comments herein need to be regarded as preliminary; TCTA hopes to be afforded the opportunity for a more in-depth engagement in the near future.

The following assessment is presented along three broad lines:

- Completeness as strategy, specifically in addressing the following critical requirements:
 - a) How effective is the NWRS-2 in making clear, convincing arguments, based on robust situation analysis, for the choice of strategic focal issues?
 - b) Are the strategic goals clearly articulated, and then unpacked into actionable interventions (such as implementation projects), associated targets, budgets and institutional accountability? This refers to the granular level of planning required for successful implementation.

c) How helpful is the NWRS-2 in providing clear directional and programmatic guidance to the water sector?

- Robustness of supportive information, in an attempt to establish whether the NWRS-2 draws on comprehensive and robust data from the most recent water resources assessment studies, to underpin its key findings and strategies.
- Presentation and flow, with a focus on whether the organization and articulation of content aid the understanding of strategy and actions.

COMPLETENESS AS STRATEGY

1. It makes sense that the NWRS-2 addresses key points of progress with the implementation of the NWRS-1, while also pinpointing some of the shortcomings of the document (page xii). In moving the sector forward, the NWRS-2 rightly emphasizes the need for more equitable and robust water management. In particular, there is a sound pointer to facilitating equitable access to water for improving livelihoods and alleviating poverty among the historically disadvantaged.
2. But, as with most parts of the NWRS-2, such 'strategies' are simply articulated in broad terms, in the same manner as the numerous challenges besetting the management of water resources in the country. The proposed eleven 'core strategies' (page viii), are merely stated as a list of desirable outcomes, or statements of intent, e.g. '*committing to the protection of our water resources and ecosystems*' and '*contributing to a just and equitable South Africa*'.
3. As the core strategies are unpacked (pages 55-82), it would have been useful to provide some detail on *how* these goals will be reached, the *resources to be deployed*, and *by when* they will be achieved. The same requirement applies to more detail on how the outcomes will be *measured* and *who will be held accountable* for their execution. Currently, the '*Key Strategic Actions*', a rather high 79 in all (pages 84-93), appear like an unending to-do list, calling for a more logical categorization in accordance with familiar strategic areas of water resources management.

4. With reference to the sphere of TCTA operations, it is important to map out what specific water resource infrastructure developments are planned, and where and for what uses. Also, without necessarily regurgitating the recently developed investment framework, sector partners would want to see the financial implications of the planned actions, as well as the envisaged funding mechanisms and institutional responsibilities.
5. The articulation of the interface between the NWRS-2 and both the overarching national development strategies and other sector strategies is a useful inclusion. But, once again, in terms of the repeated attention drawn to the need for water reallocation to historically disadvantaged users and rural development, in relation to other competing uses, details of planned implementation actions are required to operationalize the current generic statements. Such actions should take cognizance of the varying dynamics of water resource availability across water management areas and the hard trade-offs to be confronted.

ROBUSTNESS OF SUPPORTIVE INFORMATION

6. The difficulty with presenting detailed management actions in the NWRS-2 seems understandable, at least in part: the document currently lacks the technical information and robust analysis that would underpin specific strategic responses for each water management area.
7. It is not clear what is meant on page 96 by 'theses studies...provide sufficient insight to develop and present strategic perspectives of the national and WMA water situations', as no details are provided for essential catchment descriptors, including mean annual run-off, total yield and water requirements (current and projected). And, equally absent, is the related analysis of whether the catchment area is in surplus or in deficit, pointing to what specific interventions would be required.

PRESENTATION AND FLOW

8. The articulation of strategies for managing water resources needs to be kept as simple as possible, using established (or amended and improved)

strategic themes, especially in sync with what is stipulated in Sections 5 and 6 of the National Water Act in respect of the NWRS.

9. In its current form, the NWRS-2 would seem to succumb to a rather convoluted strategic framework, comprising what are described as eleven 'core strategies', two 'detailed core strategies', seven 'technical strategies', four 'enabling strategies' and four 'governance strategies'.
10. First, by any standards of strategy-making, irrespective of sector, the adopted approach appears like an over-kill. Second, the potential for overlapping implementation tasks among 28 discrete strategies is quite vast, and will probably serve as an inhibitor. To ease implementation, a rationalization of the current complex structure would be necessary.
11. For a second edition of the NWRS, the document may need to present itself more as predominantly programmatic, rather than definitional and academic. Unless there is a pinpointed concern with the existing policy fundamentals, it may be difficult to decipher why obvious water management principles are re-launched as 'smart water management' or 'developmental water management'. It is also unclear whether there are many potential users of the NWRS looking out for the basics of the 'hydrologic cycle' or boxed schematic of a 'catchment area'. There is no doubt, however, that simple definitions and schematics for the entire NWRS-2 could be provided in more colorful versions in flyers.
12. The finer issues of document structure and flow are probably more relevant at the tail-end of the process, but cognizance needs to be taken of the need to revisit the currently inconsistent referencing approach and its carry-over to figures and their listing.

CONCLUSIONS

While the NWRS-2 underscores some strategic issues in water management that the country needs to confront and resolve, it seems that the document would require a lot more mileage to meet the standards required of a good strategy revising and updating the NWRS-1. Some of the areas for improvement are in terms of a rigorous and disaggregated situation analysis of water resources and

their management, details and clarity of planned actions and their implementation, and the simplicity of documentation.

In the light of the foregoing, the core question that surges to the fore for the average reader is as follows: Are the operational strategies and actions still to emerge from the planned public consultation and further analysis?