

Comments on South African Green Paper on National Climate Change Response International Institute for Environment and Development

Overall

- Objectives and principles appear to conform to UNFCCC objectives and obligations.
- Focus on equity and public participation is praiseworthy.
- Acknowledgement of South Africa's mitigation issues is honest and important, i.e. dependence upon coal as an energy source and the need to develop alternative sources of energy.
- Gender should be mentioned as a cross cutting issue.

Section 4: the South African Climate Change Response Strategy

- The strategy is based on the paradigm growth equals development equals capacity to adapt.
- The strategy is based on 'business as usual baseline' and is not in line with South Africa's commitments to international climate change regime. A historic baseline is more credible and transparent than the 'business as usual' approach they use.
- The strategies in section 4 mention the use of incentives and disincentives to promote behavioural change to support the transition to low carbon society and economy. Transition to a low carbon society should happen in a fair and equitable manner so that the rights and interests of poor and marginalised groups and communities are considered in the process.
- On response and trade measures, it appears as if South Africa is willing to accept trade restrictions ('Recognise that measures taken by developed countries in their efforts to respond to climate change may have detrimental effects on high carbon and energy intensive economies such as South Africa. These response measures may include trade measures including border tax adjustments, and could be reflected in a reluctance to trade in goods with a high carbon footprint. South Africa's climate change strategy must recognise and address this and also create mechanisms that will give high carbon sectors the support and time to move to lower carbon forms of production.'). The Green paper may rather highlight the new trade arrangements under WTO Doha round which reflect or balance historic responsibility for GHG emissions (environmental destruction in general, imperialism... etc) with the need to develop.

Section 5: Policy Approaches and Actions

- Logically set out and clear approach in considering sectoral concerns.
- Some argue that nuclear energy leaves behind an extremely dangerous legacy for thousands of years and that is difficult to be perceived as part of a sustainable development. While their operation generates little CO₂, their construction, uranium mining, processing and transport, waste storage and plant decommissioning are very carbon intensive.
- It would be useful to include something on the transboundary management of natural resources - maybe in connection with water, marine biodiversity or fish. To a large

extent the effectiveness of climate change response measure will depend on intergovernmental coordination - in for example one of the joint river management commissions/committees.

- In the section on energy there should be a commitment to public funding (pp 14&15). Without significant subsidies for start-up activities nothing might happen.
- CDM is not even mentioned in the Green Paper.
- In relation to sectoral approaches, the top priority should be wind and solar energy.
- The implications of CCS applications for developing countries are not very well researched yet. It requires high volume of energy to separate, transport and store the carbon. Consequently a coal fuelled power station with CCS has to burn tonnes of extra coal. This will increase electricity prices significantly.
- Under transport (5.6) constructing and improving train lines should be committed.
- In conjunction with other causes climate change will lead to significant migration (as an adaptation strategy). South Africa (probably as a host state) may think about agreements with neighbouring countries on how to deal with migration and support climate "exiles"/"refugees"/"migrants".
- The commercial forestry section is not clear. It seems to mix apples and pears, i.e. talks about commercial (invasive) forest stock and natural forests in one breath and doesn't seem to address REDD+ issues in the international process.
- Inclusion of ecosystems in the sectoral analyses is positive.
- Marine environment receives balanced coverage in the green paper and differentiation of human settlements across urban, rural and coastal is useful.
- Generally, on the key mitigation sectors, it is necessary to make sure that responses to the issues are in line with submissions made by South Africa to Appendix II of the Copenhagen Accord (and future submissions under process set out in Decision - /CP.16).

Section 6: Roles and Responsibilities

- Under Roles and Responsibilities, paper shows a keen understanding of the local nature of problems and solutions, but must ensure that there is a coordination of efforts at all levels.
- The obligation for all government departments to have conducted a review of all policies, strategies, legislation, regulations and plans falling within its jurisdiction or sphere of influence to ensure full alignment with the National Climate Change Response Policy by 2012 seems ambitious.
- Government authorities should be also be encouraged to identify new legislation that might be useful and necessary.
- Business, organised labour and civil society are being considered as partners in the endeavour. The outreach to civil society could be strengthened through action and specifically targeted communication programmes.
- The institutional framework should link to the climate branch of the department for environmental affairs. Without a proper infrastructure and competent civil servants the ministerial committee is likely to remain a talking shop. There should be a minister for climate change similar to some other countries such as the UK and Australia.

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- Likewise, the requirement that by 2014, all government departments ensure that all policies, strategies, legislation, regulations and plans falling within its jurisdiction or sphere of influence are fully aligned with the National Climate Change Response Policy also seems ambitious.
- Overall, this is a clear, articulate presentation of the responses required by the government to deal with climate change in South Africa, and it does acknowledge the additional cost and manpower required of implementing this proposed policy, but it will require significant financial, human and technology flows to do so.