

# **Comments on South Africa Green Paper on Climate Change**

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# 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.

# Comments on Strategy

- A historic baseline is more credible and transparent than the 'business as usual' approach they use.
- 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 (These response measures may include trade measures including border tax adjustments).

# Policy approaches and actions

- Logically set out and clear approach in considering sectoral concerns.
- However, 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 CO<sub>2</sub>, 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 .

# Policy approaches and actions

- 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.

# Roles and Responsibilities

- 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.

# Roles and Responsibilities

- 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.