Parliamentary role and relationship in effectively addressing of climate change issues - Namibia

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List of abbreviations

ACP-EU JPA African, Caribbean and Pacific -European Union Joint Parliamentary Assembly

COP Conference of Parties

DEA Department of Environment Affairs

DRFN Desert Research Foundation of Namibia

INC Namibia Initial National Communication

IPCC Intergovernmental Panel on Climate Change

MAWF Ministry of Agriculture, Water and Forestry

MET Ministry of Environment and Tourism

MF Ministry of Finance

MFMR Ministry of Fisheries and Marine Resources

ML Ministry of Labour

MLRR Ministry of Lands, Resettlement and Rehabilitation

MME Ministry of Mines and Energy
MTI Ministry of Trade and Industry

MWTC Ministry of Works, Transport and Communication

NA National Assembly NC National Council

NCCC Namibia Climate Change Committee

NDP3 National Development Plan 3 NGOs Non-governmental organisations

NNF Namibia Nature Foundation NPC National Planning Commission

SC Standing Committee

PoN Polytechnic of Namibia

OPM Office of the Prime Ministry

UNAM University of Namibia

UNDP United Nations Development Program

UNFCCC United Nations Framework Convention on Climate Change

1. Introduction

1.1 Background to the study

Climate change is regarded by some people as not real (due to its long-term impacts) and nothing but a 'buzz word', but in reality it is very complex and is largely not very well understood. Thus, it is not easy to predict, with any level of certainty the effects of climate change. This is so due to the complexity of the variables involved in the climate system (IPCC, 2007). The impacts of climate change is thus broadly categorised into social, economical and environmental and therefore there are both risks and opportunities involved.

Since the first World Conference on Climate Change in 1979, followed by the establishment of Intergovernmental Panel on Climate Change (IPCC) in 1988, the enforcement of United Nations Framework Convention on Climate Change (UNFCCC) in 1994, adaptation of Kyoto Protocol and subsequent Conference of Parties (COP) meetings, the parties involved still have difficulties in reaching consensus regarding the climate change issues (UNFCCC,2004).

1.2 Purpose of the study

The main objectives of this study are to describe and assess the Parliamentary institutions, their roles and relationships within government and their effectiveness in addressing climate change issues. This is in support of understanding the capacity and awareness of parliamentarians and high level decision makers on critical issues such as climate change, especially on the African continent. This study is being conducted in five Southern African countries, namely Botswana, Lesotho, Namibia, South Africa and Swaziland, and information will be used to make recommendations on how best to involve parliamentarians to encourage holistic and integrated decision making, understanding that climate change is a cross-cutting issue. This specific report focuses on Namibia.

1.3 Research Approach

The research was conducted on a small-scale, primarily qualitative by design (descriptive studies), collected information from various key informant interviewees following a non-probability sampling technique, purposive snowball sampling. The target group was identified in advance, being parliamentarians, staff members at the parliament, Economics, Natural Resources and Public Administration standing committee members, relevant staff members in the Ministry of Environment and Tourism (MET) and members of Namibia Climate Change Committee (NCCC). The benefit of using the snowballing technique was mainly to get references to those informants that are familiar with the issues making it

easier to discuss the topic and to get as much information as possible. The same technique was used with regard to obtaining the relevant documentation (or referred to those people that would have the documents). This technique also provided the researcher room to have "quality" interviews (due to credibility of references or prior contact) with the interviewees. In total, the research collected information from 11 interviewees (see appendix 1 for details).

1.4 Limitations to the study

The parliament recess coincided with the study period and thus members of parliament were not accessible for interviews. The biggest limiting factor for the study is lack of documented information, coupled with no clarity of where and who could be contacted for detailed information.

2. Climate change in Namibia

2.1 Climate change effects and challenge

It is predicted with a high degree of certainty that Namibia will become hotter throughout the years (with a predicted increase in temperatures of between 1°C and 3,5°C in summer and 1°C to 4°C in winter in the period 2046 - 2065), with increased variability in rainfall trends (MET, 2008). Considerable spatial heterogeneity in the trends has been observed, but it appears as if the northern and central regions of Namibia are experiencing a later onset and earlier cessation of rains, resulting in shorter seasons in most vicinities. As far as predictions for the future are concerned, it is not obvious whether Namibian rainfall will be reduced, although intensity is likely to be increased (Dirkx et al., 2008). These ambiguities in changes in rainfall and runoff in Southern Africa in general and Namibia in particular, suggests that groundwater recharge may suffer a reduction of 30-70% across Namibia; a potential exception could be found in the recharge of alluvial aquifers that have their origins in central areas of Namibia(MET, 2008). It is predicted, even without the additional stresses of climate change on the water resources, that demand will have surpassed the installed abstraction capacity by 2015 (MET,2008). In terms of water resource management the combined impact of climate change, population growth and development imply that there needs to be continued attention for dealing with evaporation and thus for improving efficiency of the utilisation of water resources.

It is important to underscore that variability is likely to remain the key aspect of Namibia's climate in the future. Vulnerability to environmental change not only depends on change in frequency or duration of climatic conditions, but also on the capacity to respond adequately to those changes. Poverty, lack of income and employment opportunities greatly exacerbate the vulnerability of households as these factors substantially constrain access to productive

resources, such as agricultural production and food security. Ultimately they contribute to limited adaptive capacity and vulnerability.

Adaptation is the process to improve society's ability to cope with changes in climatic conditions across time- and policy scales. Following a brief vulnerability assessment by group of consultants, of "agricultural policy in the context of climate change adaptive responses for the agricultural sector are structured along technical, policy and institutional topics, and include inter alia diversification options, management practices, improving the exercise of best technical options as well as the improving the characteristics of such available options, and communication and translation of information. The importance of addressing climate change from a developmental perspective, cutting across policies and warranting action today is highlighted" (Dirkx et al, 2008). In terms of managing the impacts of drought and floods the capacity for disaster risk preparedness, rather than disaster response, should be strengthened. Spatial planning that takes ecosystem requirements into consideration has the potential to markedly reduce flood related costs. Finally, in order to address the disaster-related risks suffered by the majority of the rural population it is of utmost importance to look into the matter of developing pro-poor disaster insurance schemes. According to Mfune, et el, (2009a), the direct effects of climate change on the various economic sectors could potentially be felt in thematic areas such as water; agriculture; fisheries; ecosystems, biodiversity and tourism; coastal zone; health; and energy.

In relation to this brief study, all interviewees were well aware of general climate change impacts, but only some could highlight specific Namibian impacts and even fewer could recommend how do deal with these issues. In this regard, information and communication was deemed as very important, especially translating the impacts to grass root levels for communities to be better prepared and to make informed decisions regarding their livelihood options. Furthermore, appropriate and "practical" policy frameworks were highlighted as important to support the climate adaptation and mitigation process. An interviewee, specifically proposed that the next National Development Plan 4 (2012-2016) should be adapted and centred around climate change issues so that each role player, sector can enhance the adaptation and mitigation aimed at reducing the impact poverty. The need to have environmental, socio economic and political will, mainly driven by the parliamentarians was highlighted. This exercise should include enforcement and indicator mechanisms to hold stakeholders accountable on taking serious and relevant climate change action.

2.2 Policy/legal framework for Climate Change in Namibia

Namibia has no policy on climate change. Drafting of such a policy has commenced as part of the National Development goals and more specifically the Namibian obligation under the second national communication to the UNFCCC. In conjunction, a national climate change strategy and action plan is also being prepared as a necessary tool to facilitate climate change adaptation and mitigation to reduce its impacts on socio-economic development of the country. The strategy will constitute a framework that will ensure effective implementation of obligations of UNFCCC, hence contributing to addressing this global problem. The propose vision of the Namibia national climate change policy is (Mfune et al, 2009a):-

Namibia has significantly lowered the vulnerability of its population and sectors to predicted climate change impacts, through the adoption and successful implementation of appropriate and effective climate change adaptation and mitigation measures in line with Namibia's national development goals and vision.

Principles guiding the National Policy on Climate change range from sustainable development; stakeholder participation, education, training and capacity building to transparent planning and decision making (Mfune et al, 2009b). The Namibia Climate Change Strategy is therefore based on three (theme-based) aspects (Mfune et al, 2009b):

- Adaptation: including themes such as food security and sustainable resource base;
 sustainable water resources; human health and well being and infrastructure
- Mitigation: Sustainable energy and low carbon development; transport
- Cross-cutting issues on adaptation and mitigation: such as capacity building, training and institutional strengthening; research and information needs; public awareness, participation and access to information; disaster reduction and risk management; financial, resource mobilisation and management; international cooperation and networking; technology development and transfer; and legislative development.

Namibia provides for a broad variety of sectoral legislation, which directly or indirectly are important in addressing climate change issues. These include:

- the Vision 2030 (as part of the strategic goal addressing protection of natural resources);
- the National Poverty Reduction Action Plan (NPRAP) (2000) (includes a peoplecentred poverty reduction approach linking it to poverty reduction efforts to regional needs, as established in regional poverty profiles)
- the National Development Plan 3 (as part of the strategic goal ensuring the protection of environmental concerns are the optimal and sustainable utilisation of renewable and non-renewable resources, especially focusing on sustainable energy)

- the Environmental Management Act (2007) (provides the environmental framework legislation, which includes principles for environmental assessments, environmental protection and sustainable use of natural resources)
- the National Disaster Bill;
- the Pollution Control and Waste Management Bill (make provision for the establishment of an appropriate framework for integrated pollution prevention, control and regulate the discharge of pollutants to the air, water and land
- National Drought policy (deals with national emergency and long term drought management policy and strategy to combat land degradation)
- The Water Resources Management Act, Act 24 of 2004 (WRMA), is based on IWRM principles, and provides overall guidance for the water sector, but is not yet fully implemented. Integrated Water Resources Management (IWRM) has been identified as an essential strategy for the development, sustainable utilisation, conservation and protection of the water resources in Namibia (IWRM JV, 2010).
- National Agricultural Policy (stipulates potential strategies to improve food security, expand income through export of products and to create employment. Commercial and subsistence agriculture is therefore seen as key in supporting the sustainable and equitable growth of Namibia's economy, whilst maintaining and improving livelihoods at household levels.
- Namibia Forest Act and Policy, (provides for enforcement mechanisms (licensing, certification, establishment of Forest management authorities) to protect forestry resources).
- the White Paper on Energy Policy of 1998, set the goals for security of energy supply through a diversity of reliable sources. Hereby, the Policy puts an emphasis on the development and sustainable use of Namibian resources (MME 1998). In 2000, the Rural Electrification Master Plan was completed and then revised in 2005. It identifies the need for the development of on-grid and off-grid infrastructure.

3. Namibian parliament

The Parliament of Namibia (currently the 5th Parliament) consists of the National Assembly (NA) and the National Council (NC), together forming the Legislative arm of Government, which is one of the three institutions of the State, the others being, the Executive (Cabinet) and the Judiciary (the Courts) (Ombudsman and Konrad-Adenauer-Stiftung, 2010). According to the Constitution, a mixed electoral system is followed in Namibia, to value democracy and enhance accountability of Members of the Parliament to their constituencies. The proportional representation system is deemed more inclusive and participatory (encourages women participation) and hence is the favored system for the National Assembly elections, above Plurality electoral system which is used for the Regional and National Council elections. In the former mentioned system the different political parties each present a list of candidates to voters, and voters have to choose between the different political parties and their lists of candidates. The seats are thus allocated to each party in proportion to the percentage of votes received during the election. However during

regional and national council elections, the electorate votes for candidates and not political parties, and choices are therefore based on candidates' delivery. In other words, a political party could win a majority of seats and not a majority of votes.

The National Assembly consists of 72 voting members, elected for a term of five years on the basis of proportional representation, plus an additional six non-voting members appointed by the president. The National Council was formed in accordance with chapter eight of the Namibian Constitution, on February 1993, after the regional elections held in November 1992. The National Council consist of 26-members (two from each of the 13 geographic regions), serving for six years. The National Council reviews bills passed by the National Assembly and recommends legislation on matters of regional concern for submission to and consideration by the National Assembly (Namibia, 2009). Article 63 and 74 of the Constitution of the Republic of Namibia clearly outlines the wide ranging functions and powers of the two Houses of Parliament. The major function being that of making and repealing laws (national and international agreements) and national budgets for effective government and administration of the country (Namibia, 2009 and Ombudsman and Konrad-Adenauer-Stiftung, 2010).

An important arm of the legislative process is the supporting structures, namely Parliamentary Standing Committees, also called Portfolio Committees. These committees in general perform the functions, tasks and duties relating to Parliamentary supervision of such Offices, Ministries, Agencies and State Owned Enterprises as prescribed by an Act of Parliament. The committees play an advisory function on all matters investigated/raised through inter-ministerial meetings and legislative proposals from the National Assembly in accordance with the Constitution. There are seven standing committees (figure 1), however for the purpose of this study the focus will be on the Standing Committee on Economics, Natural Resources and Public Administration which is tasked to support, coordinate and have the oversight on the Climate Change related activities between the parliament, the Ministry of Environment and Tourism (MET) and the people at grass roots level. In addition, this committee is also tasked to represent the Parliament at international events on natural resources management.

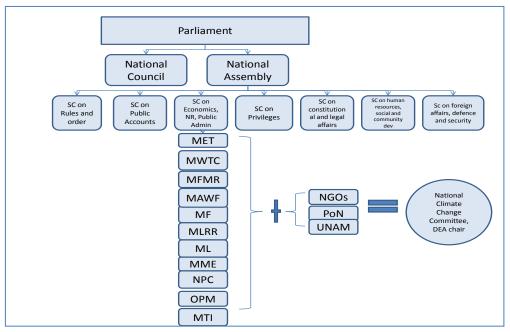


Figure 1: Parliamentary structure, zooming into relevant structures dealing with climate change issues.

Reportedly, the Committee first got involved directly in climate change issues in 2008 during their participation in the African, Caribbean and Pacific -European Union Joint Parliamentary Assembly (ACP-EU JPA) held in Papua New Guinea where parliamentarians were urged to play vital role through government to implement the Kyoto Protocol, which was ratified in 1995 by Namibia.

3.1 Involvement of Parliament in Climate Change activities/projects

There are no specific climate change projects or activities (as highlighted by the majority of the interviewees) that the committee is responsible for, however they are monitoring progress of activities implemented and initiated by Ministries and other stakeholders. For example, in 1998, a study on Namibia's climate change was completed from which the Namibia Initial National Communication (INC) was formulated and submitted to the UNFCCC in 2002. The study and the formulation of INC was carried out in consultation with various government ministries, department and private sectors as well as non-governmental organisations with the aim to "develop and adopt pre-emptive and corrective actions and activities to address the predicted and actual impacts of climate change" (Namibia, 2002).

Furthermore, the Ministry of Environment and Tourism (MET) was nominated as the lead ministry for co-ordinating climate change activities in Namibia, based on its administrative and technical capabilities. As a result a multi-stakeholder Namibia Climate Change Committee (NCCC) was established in 2001, with the Ministry of Environment and Tourism, specifically the Department of Environment Affairs (DEA) being the chair and other members involved are Office of the Prime Minister (the Disaster Management Unit), all other affected line Ministries, United Nations Development Program (UNDP), Polytechnic of Namibia, University of Namibia and non-governmental organisations (NGOs) such as the

Desert Research Foundation of Namibia (DRFN) and Namibia Nature Foundation (NNF). The aim of NCCC is to advise the government (in particular the Parliamentary Standing Committee on Economics, Natural Resources and Public Administration) on climate change related issues as well as to direct and oversee further obligations of Namibia to the UNFCCC (Namibia, 2002). Since the establishment of the NCCC in 2001, there is continuous change in representation in the NCCC members. Similarly there are changes in representation in the Standing committee members as they are linked to national elections. These changes could be seen as both advantageous as well as limiting, due to lack of continuity. According to an interviewee the change is fairly needed in broadening the ideas and inputs on climate change and related topics.

Furthermore, parliamentarians through the Standing Committee played a crucial role in soliciting input from communities, regional councils and general public at large on the Draft Namibia Climate Change Policy as initiated by MET. Similarly, the standing committee members were involved in the review of national climate change circumstances report and other similar reports, which were called for by the Namibia Committee on Climate Change (NCCC), coordinated by MET, as part of a series of studies that were needed in preparation of the Second National Communication (SNC) on Climate Change for the United Nations Framework Convention on Climate Change (UNFCCC). The Review of Circumstances report captured Namibia's vulnerability and its capacity to respond to impacts (of climate change) in relation to the country's health sector; stakeholder involvement in the economy; addressing the scarcity of water supply within the context of an ever-increasing demand; Community Based Natural Resource Management (CBNRM) programs and the tourism sector; and possible reduction of environmental degradation through livelihood development and poverty alleviation for the rural population.

The direct involvement of parliamentarians in climate change activities are through their support structures at policy level, which primarily includes attendance of high level international meetings and cabinet submissions. Interviewees highlighted the following meetings attended, however also mentioned that no follow-up/feedback took place after these meetings:

- CoP 15
- International Commonwealth Parliamentary Associations Conference on Climate Change, June 2010 in London [Outcome of meeting: supporting and influencing formulation and implementation of climate change policy].
- Second forum on the Pan African Parliamentarians Network on Climate change, held in Kenya Nairobi, October 2009 [Outcome of meeting: parliamentarians to understand the complex negotiations in ensuring lasting solutions on climate change]

In response to some of the activities by line Ministries, the Standing Committee members took part in the familiarisation trip of the Green Scheme project encouraging communities to take initiative in ensuring food self-sufficiency and crop diversification (including creating employment creation opportunities) despite poor and highly variable rainfall patterns observed, especially in past two years. Farmers particularly in the Kavango region has been challenged with late rains and thus crops rot before harvesting, hence the introduction of modified seed varieties, which give good yields in shorter time periods.

3.2 Challenges facing parliamentarians regarding Climate Change involvement

According to interviewees, the potential for climate change related activities is huge in Namibia, given its vulnerability to climate change impacts. 70 percent of the interviewees indicated that a clearer understanding of the climate change concept and its impacts are imperative for parliamentarians to become more actively involved in various initiatives through the standing committees. Hence informal training to enhance the knowledge of parliamentarians on issues of climate change cause, impact, mitigation and adaptation was mentioned as unavoidable.

Reportedly, lack of skilled personnel, technical support structures and knowledge on climate change related issues, especially during public consultation or presentations is evident resulting in conflicting and confusing messages spread by various members of the standing committee on climate change impacts. Technical facts and statistics are required to convey informed messages to targeted audiences and the public in general (especially when addressing people at grass root levels). Furthermore, there is a greater need to shift from "point of knowledge to action" as mitigation and adaptation measures and efforts towards dealing with climate change effects are implemented at a very slow pace. For example disaster risk management is currently only focused on short term rapid solutions adaptation actions, without much emphasis on preparedness (a discussion at NCCC meeting was referenced). Thus the clear need to make information accessible to all including aggressive awareness raising efforts.

Financial and technical human resource needs were overemphasised by interviewees to address the challenges indicated above. Capacity building is needed not just for parliamentarians to make informed policy decisions, but also for practitioners to feed the process of decision making, thus engaging in various research and studies on Climate Change at formal education level is encouraged.

Consistency and continuity of the standing committee members are affected by every 5th year's elections resulting in change of the parliament and chairpersons of the standing committees, which mean interests, focus and momentum of various initiatives, are hampered. One interviewee indicated that personalities and background of the chairpersons

of standing committees also determine which issues to focus on. For example within the Standing Committee of Economics, Natural Resources, and Public Administration, emphasis is placed on any one of these concepts depending on the interests of the members of the committee. Overall there is a need for dedicated parliament sub-committee members on Climate Change, who can recognise the cross-cutting elements and link the socio-economic and sustainable issues. 50% of the interviewees indicated that the understanding and interpretation of certain government ministries and NGO's are different, resulting in isolated projects which if not coordinated leads to duplication of efforts, which is a waste of resources and time.

There is little evidence of parliament involvement of wider stakeholders in the preparation for international meetings such as COP15, for example. It is important that all stakeholders are involved in prior discussions, debates as well as giving inputs into statements or position papers on certain issues. In addition, very little feedback takes place after major events were attended and thus very little follow-up is done on outcomes of these meetings. The process as is, is not inclusive and thus making collaborative implementation plans more challenging. According to an interviewee, many stakeholders are only receiving information when major international agreements are signed, which influences how issues are perceived and implemented at lower levels.

4. Conclusion and Recommendations

The study revealed that the Parliamentary standing committee has limited involvement in climate change activities and projects, however makes use of line ministries and other supporting structures such as the NCCC to make informed decisions regarding climate change policies and national direction. However, it also indicated that there is little direct interaction between the parliament standing committee and the NCCC as communicated through the MET. This was attributed to lack of regular platforms upon which the climate change issues are addressed.

To strengthen the role of Parliament and its supporting structures (especially subcommittees) in climate change, the following functional and structural recommendations are proposed:

• Coordination: there is a need effectively establish an all inclusive climate change platform to increase coordination and cooperation amongst various stakeholders (especially through the NCCC). In addition there is a need for sector based integration on climate change issues, through developing effective monitoring and feed-back mechanisms. The involvement of private sector (e.g. mines, industries to limit carbon emissions, explore carbon trading opportunities etc) has been limited so far in climate change initiatives and there is a need to bring them on board as well to make a bigger national impact on climate change related activities.

- Promotion of capacity building initiatives: There is a strong need for building the
 capacity and understanding throughout the nation on climate change related issues.
 In this regard, existing tools and information can be promoted such as the climate
 change toolkit.
- Resource mobilisation: There should be a specific budget for specialised activities (based on work plan of NCCC) to support various capacity building/ awareness raising activities.
- Composition of Standing Committee: As it stands the standing committee deals with three distinct (yet related) components: Economics, Natural Resources and Public Administration. It is recommended that the latter be removed and placed under the standing committee on public accounts (changing it to public accounts and administration). This would allow more focused activities to be incorporated into the committee portfolio.
- Information (lay-man friendly) flow: Establish a system within the parliamentary set-up to inform all other portfolio committees. Regular update newsletters (one page), similar to what the Desert Research Foundation of Namibia on various issues relating to natural resources use and climate change impacts. This function is important (best done through NCCC) to translate high level international agreements into easily understandable concepts highlighting implications, consequences (practicality) of such agreements at grass-root level. An up-to-date (user friendly) information and knowledge management system needs to be in place to maintain a certain degree of consistency to inform in-coming members of progress and recommended activities to keep initiatives and project implementation going.
- Regular public debates: there is need for constructive public debates and prior discussions and consultations with parliamentarians on policies (and lack of implementation) and international agreements negotiations and country positioning on various topical issues.

Overall, strengthening the parliamentary standing committee, provision of relevant capacity building, technical assistance and increase cooperation with the multi-sectoral stakeholders is critical for parliament to effectively engaged in addressing the climate change related issues of national interest.

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6. Appendices

6.1 List of interviewees

Name	Institution	Position
Mr. Brian Riruako	National Assembly	Information officer and member of NCCC
Mrs. Juliet Mupurua	National Assembly	Director: Committee Service
Mr. Immanuel Nehoya	National Assembly	Principal Parliamentary Clerk
Honourable Dr. Moses Amweelo	Parliament	Member of Parliament and Standing Committee on Economics, Natural Resources and Public Administration
Honourable Peya Mushelenga	Ministry of Foreign Affairs	Deputy Minister and former chairperson Standing Committee on Economics, Natural Resources and Public Administration
Mr. Johnson Ndokosho	Ministry of Environment and Tourism	Technical Advisor of Africa Adaptation Project on Climate Change, Namibia and member of NCCC
Mr. Petrus Muteyauli	Ministry of Environment and Tourism	Environmental officer and member of NCCC
Mrs Christine Tangeni Mukumba	Ministry of Environment and Tourism	Deputy Director of Department of Environmental Affairs
Mr. Alex Merero	Polytechnic of Namibia	Lecturer and member of NCCC
Mr. Reagan Chunga	Ministry of Environment and Tourism	Project officer and member of NCCC
Mrs. Hertha Nicodemus	Office of the Prime Minister, Disaster Risk Management unit	Senior officer and member of NCCC

6.2 Interview guide

Interview questions

- 1. What is Climate change and its impacts on Namibia?
- 2. What should be done to reduce the impact of Climate Change.
- 3. Can you please explain the parliament's structure, its operation and support structure dealing with Climate Change issues?
- 4. What are the previous and current activities of parliamentarians regarding the climate change? What are the lessons learnt from those activities/projects for future approaches by parliament?
- 5. Any debates, presentations, amendments or submission to parliament regarding Climate change issues? Was it discussed, what can be done to improve the input for debates, amendments or submissions.
- 6. What are the issues hampering this section/unit in addressing Climate Change issues effectively?
- 7. Who are the role players (line ministries/organisations) the parliament interact with regarding the Climate Change?
- 8. How do parliament relate to the United Nations Framework Convention on Climate Change Nations
- 9. Describe the interaction between the parliament and other organs on climate change? Is it effective, yes, no and why?
- 10. How do parliament relate to the COP15 and how this has worked for COP 15 held in Copenhagen, 2009
- 11. Is there any policy/legal framework for Climate Change? and is it easily understandable and implementable and why?
- 12. Which other policies, laws are applicable or are followed with regard to Climate change?
- 13. How does a document/policy on climate change move from the initial state till it gets endorsed by the Cabinet (Can you please explain how a legislation relate to the Climate Change is formulated?)
- 14. Do you think this process is effective in ensuring CC issues are addressed? Yes, No and why and what can be done to improve it?