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**Submission**

**to the**

**Department of**  
**Environmental Affairs**

**on the**

**Draft National Adaptation Strategy**

**28 February 2017**

## **1. Introduction**

The Parliamentary Liaison Office of the Southern African Catholic Bishops' Conference welcomes the opportunity to comment on the draft National Adaptation Strategy (NAS). The strategy's commitment to build South Africa's resilience and adaptive capacity to respond to climate change risk and vulnerability, while providing guidance on the integration of climate change responses into current and future development objectives, is noteworthy. This will be achieved through the optimisation of policy, planning, and implementation of climate change adaptation actions. We therefore commend the Department of Environmental Affairs for creating this informative Adaptation Strategy, and hope that the strategy, once it is concluded, will provide urgently-needed improvements in the situation.

We wish to draw attention to a few points:

## **2. Points of Agreement**

2.1 We welcome the recognition of the broader development context of South Africa and the highlighting of crucial messages acknowledging that transformational, far-reaching change is required to address the challenges presented by climate change. We support the fact that the NAS has taken into consideration all existing sectoral, provincial, and local climate change adaptation strategies in South Africa, as well as those currently in development by noting the importance of:

- A cross-sector and multi-actor approach that will aid a more holistic response to climate change impacts;
- The in-depth contribution of Monitoring and Evaluation;
- The potential role of science and academic input; and
- The importance of capacity building.

2.2 The stakeholder consultation efforts in relation to this document are notable. The foregrounding of local government in climate change adaptation is a welcome intervention. This additional function will require adequate capacitation of municipalities.

2.3 We agree that climate change matters need to move from Department of Environmental Affairs into a different institutional structure that will look at climate change from a sustainably progressive perspective.

### **3. Concerns and Proposed Changes**

3.1 The strategy could be more ambitious and deliberate in using Indigenous Knowledge Systems to adapt to the vast effects of climate change.

3.2 The lack of an implementation plan hinders this strategy, leaving an information void that will impede citizens from gaining the deep understanding of the issues that should be characteristic of a comprehensive National Adaptation Strategy. This reduces the strategy to a myriad of grand plans, without a plan stating how these will be achieved.

3.3 Overuse of the word “Resilience”, resulting in incoherence regarding the intended meaning of the term. Through interventions of public participation, the public must be given the chance to define resilience so that it is not perverted or used maintain the status quo. Responsiveness in this regard is vital so that the masses are given flexibly appropriate adaptation measures allowing communities to ‘bounce forward’<sup>1</sup>, ensuring that social concerns are not over-ridden by economic aspirations.

3.4 Transformational development – The current developmental challenges and needs must be clarified, with reference to the achievement of South Africa’s sustainable development objectives and the maximization of opportunities for advancement. The requirements of systematic change need to be articulated clearly.

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<sup>1</sup> A holistic, transformative understanding of resilience can help cities bounce forward to a future that is sustainable, equitable, and resilient.

3.5 The NAS places too much responsibility on the government in a manner that excludes communities and civil society organisations. This must be rectified through the implementation plan of this strategy, which should ensure that people in South African communities are actively involved in the development of solutions that distribute opportunities more fairly and eradicating the inequities that magnify vulnerability to disaster— so that all people have a chance to adapt and thrive in a fast-changing world. The demands by society for solutions for them, by them, need to be heeded.

3.6 The localization of the designing and delivery of targeted climate change vulnerability reduction programmes should be approached with aims to strengthen individual and household adaptive capacity, in collaboration with civil society and the private sector.

3.7 A more thorough vulnerability assessment needs to be carried out looking at local government vulnerability, since the proposed responsibilities of local government obligate municipalities to play a more active role in mitigating and adapting to the extensive impacts of climate change. This has financial as well as other material implications. Furthermore, it will be beneficial to conduct a much closer examination of the plans for sector-based resilience; looking at the implementation of cross-sector approaches, over and above improved local government engagement.

3.8 We welcome the acknowledgement that climate change is more of a sustainable development issue than it is an environmental issue. However, moving climate change to the Department of Co-operative Governance and Traditional Affairs needs to be reconsidered in favour of a more dynamic and influential Ministry.

3.9 Monitoring and evaluation – it would be valuable for attention to be placed on the manner in which learning will be measured. Alternatively, the information should be included in the implementation plan.

#### **4. Conclusion**

We welcome the development of this strategy and look forward to improved climate change adaptation tactics and their consequent application in our communities. We wish the Department well in its deliberations.

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