



Submission

to the

Department of Environmental Affairs

on the

DRAFT CLIMATE CHANGE BILL

27 July 2018

We welcome the climate change bill, and therefore would like to make a brief contribution towards the improvement of the bill.

1. Positive

- It is good that we have a bill that will give effect to climate change response efforts.
- The review timeframes for the NCCAS, carbon budgets, climate change response implementation plan and SETs is an excellent aspect of the bill, for it is in alignment with the review of most of the country's development plans and international climate change reporting. Hopefully it would help in evaluating progress in implementation as far as climate change response is concerned.

2. Education, awareness and public participation

- Both section 16 and 17 of the climate change bill have an aspect of public participation, but it's not clearly covered. Impacts of climate change in South Africa are mostly going to affect the poor in rural communities (amongst other vulnerable groups), it is important to note that these are areas where newspapers can be a very scarce resource, and half of the population in these communities cannot read and write- section (17) subsection (1) (b). Which impedes the aim of getting meaningful representation from members of the public, as it is provided for in the bill- section 17 subsection (2) (b).
- There has to be serious considerations on how policies and strategies include and serve the needs and interests of all South Africans, and that public participation do not come as an afterthought.
- Enhancing a good working relationship between government and community based organisations would be a good starting point for creating a conducive environment for all members of the public to participate in matters that affect them

3. National Environmentally Sustainable Development Framework

- We have the National Sustainable Development Strategy, which was integrated into the National Development Plan and contributed to the Sustainable Development Goals. Given that the bill has to align to the development vision of this country, it is advisable that we look at the sustainable development framework already developed and build on existing work.

4. **Coordination and regulation**

- The bill is commended for seeking to coordinate government activities across all spheres, which is very important. But there is no clear legal basis for governing/regulating the private sector and society, provided in the bill.

5. **Policy alignment**

- There is a need for addressing policy clashes between sectors in government, GHG reduction is a priority in the environment sector, but on the other hand what we have is the energy sector that continues to invest in coal as a source of energy for example, furthermore there is nothing much said in the bill about fossil fuels.

6. **Compliance**

- The section on extending timeframes for compliance as far as carbon budgets are concerned, sounds weak and lenient as a provision for a bill that is meant to address urgent matters of climate change.

For further information please contact:

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