Input to the National Adaptation Strategy

Joint submission by Project 90 by 2030 and members of the Adaptation Network

08 December 2016

Attention: Mr Sibonelo Mbanjwa
Designation: Director, Climate Change Adaptation – Biodiversity
Department of Environmental Affairs, Government of South Africa
Email: smbanjwa@environment.gov.za

Dear Mr Mbanjwa,

We are grateful for the opportunity to engage in the development of the National Adaptation Strategy for South Africa, and have already made engagements at workshops and through interviews. We hereby submit further comments and queries.

We are supportive of the premise in the current draft that adaptation is primarily a developmental priority rather than an environmental matter, and we understand that it functions within the guidelines provided by the National Development Plan. However we are concerned about what we perceive as a built-in prioritisation of business-as-usual approaches to economic development and the protection of economic sectors that pose direct threats to our country and peoples' ability to adapt to climate change. Climate change is not merely another "threat" to be dealt with; it also presents us with unique opportunities to develop our economy in a truly sustainable way if we are able to respond appropriately and with respect to natural systems and future generations.

Adaptation is fundamentally about protecting people, livelihoods and natural systems. We understand that the number one priority of the state is to address economic development and poverty in our country. We agree with and support this prioritisation, but believe that many valuable ways to achieve this are not being practiced. Modern models of the inter-relationship between economy, society and environment recognise that economy is embedded in society and society is embedded in environment. As such we must adhere to our constitutional mandate to ensure inter-generational equity by promoting forms of economic development that prioritise protection of people, livelihoods and natural systems.

We recognise that some types of development are destructive of our sustainability in the short and long terms. We therefore request that as part of our country's adaptation strategy, we open debate on the possibility of concerted phasing out over time of certain industries and introducing in their place economic activities that are in keeping with long term sustainability principles.

With regards to phasing out, we refer specifically to industries that are heavy users of water, polluters of soil and air, and destructive of peoples' health, notably: energy production from fossil fuels; industrial tree plantations; agriculture that is dependent on heavy external input of synthetic fertilisers, pesticides and other products; and mining. With regards to new systems, we propose as examples: agroecology systems for food and natural fibre production that rely on organic inputs, strengthen biological cycles on farms, and use water efficiently and in a way that is respectful and protective of natural water resources; increased and decentralised renewable energy generation; and more stringent environmental impact assessment requirements for mining in areas that are important providers of ecosystem services and protectors of biodiversity.

We believe that development planning and implementation should be inherently climate-resilient, and that existing development work forms the foundation for adaptation interventions. There must be a high acknowledgement of the interdependence of social, natural and economic systems in planning, and as a fundamental principal in adaptation to climate change, economic development should not be promoted where it compromises social and natural systems.

We ask that there is a conscious and deliberate incorporation of mitigation into adaptation rather than merely an acknowledgement that the two are interlinked, and that the linkages between mitigation are factored into development inherently rather than addressed superficially. Key in this is the recognition that in all adaptation work there should be cognisance of the need for low carbon technologies and systems. Much adaptation work requires new development or improved development, and we ask that all such development is implemented using low carbon technologies, as well as techniques that promote and ensure the sustainability of ecosystem goods and services.

It is also important that these are not merely *lower* carbon technologies but that they are the newer and most suitable technologies available for supporting the shift to a low carbon economy, and the most appropriate for the contexts and situations for which they are intended. We believe that adaptation provides an opportunity to develop better and more sustainable systems, lifestyles, methods and technologies that not only improve resilience but also reduce our carbon footprint while providing opportunities for improved, long-term livelihood generation.

The Strategy should guide the State in ensuring that development of climate change responses act as engines of locally based economic development, and not provide a platform for further incorporation of rural communities into extractive economies.

We ask that adaptation interventions avoid a situation where the “low hanging fruit” options are prioritised at the expense of more impactful options centered around enabling affected communities and local governments to be in possession of sufficient resources of skills, technology and finance to meet their developmental challenges in the face of climate change.

In the chapter on agriculture and forestry, emphasis seems to be placed mostly on commercial farming and little mention is made of subsistence or emerging farming or problems experienced around rights of land tenure and land security. We believe these will become major points of conflict in South Africa with increasing onset of the impacts of climate change. We ask that stronger attention is given to supporting subsistence and emerging farmers with their adaptation needs and protecting livelihoods dependent on natural resources.

Policies in support of the development of economic sectors and value chains, especially the secondary economy, should address the need to assess natural resource supply and demand and climate change risk, and take advantage of opportunities presented for ensuring a higher resilience to climate change. For example, the huge current investments in agro-processing present opportunities to use renewable sources of water and energy if factored in at the start of the projects. Instead, however, the water and energy needs for producing raw materials and running factories are not sufficiently being taken into account.

While we are aware that the financing chapter is yet to be completed, it is important that we note that the current fiscal allocation system managed by National Treasury and used to distribute the national budget to the three spheres of government, and particularly the Local Government Equitable Share (LGES) formula, is implicit to climate change action and will need to be made more explicit by ensuring that municipalities in the country receive an annual fiscal allocation for their respective adaptation strategies, by so doing making climate change and particularly adaptation a funded mandate. This will not only require amendment of the Municipal systems and

structures Acts to accommodate and legitimise climate friendly systems and structures, but will also require that local government development planners are better equipped to allocate existing budget in ways that are more responsive to climate impacts and risks.

We request that the term “industrial tree plantations” rather than “forests” or “forestry” is used to refer to homogenous stands of trees, whether grown on industry-owned, state or communal lands. Forests are complex natural ecosystems, dominated by a diverse mix of spontaneously established indigenous trees, which together with shrubs and other understorey plants, provides habitat for many other forms of life including mammals, birds, reptiles, amphibians, insects, fungi, bacteria, etc. Together, these constitute a richly biodiverse symbiotic community where structure and composition is determined by natural circumstances and events, including geomorphology, climatic conditions, biotic elements, ecological succession, genetic variability and evolutionary processes. Industrial tree plantations are homogenous and monotonous stands of usually alien tree species that support strikingly low biodiversity and which are highly destructive to soil structure and water resources.

In the governance chapter, the ministry of cooperative governance has been given the coordination role. We believe that this is another missed opportunity to place the climate change desk in the Presidency. Adaptation, as rightly acknowledged in the Strategy, is a cross-cutting national development issue and therefore should reside with the National Development Plan in the planning commission.

Stronger emphasis on cities:

We request that the Strategy place a stronger emphasis on cities and the important role they play in achieving of climate change mitigation and adaptation targets, sustainability goals, as well as overall national climate change goals. By drawing on the convening power of national and international network organisations such as Local Governments for Sustainability (ICLEI), the opportunities that cities present for climate change interventions can be harnessed in a long term and sustainable manner.

Recent academic reviews of the impacts of district and local government adaptation strategies, as well as engagements with stakeholders involved in the development of district and local government plans, reflect a lack of understanding of how to convert strategies into practice. We request that the Strategy address the need for improved knowledge, skills and understanding among local government spatial planners, Integrated Development Plan and municipal managers, development and environmental officers and other relevant officials, to ensure that the appropriate capacity exists to deal with climate change impacts at local level.

For example, local government officials can be capacitated in the use of appropriate tools for developing vulnerability assessments and climate change responses, and integrating responses into local development plans. Some tools that could be used are *Local government climate change strategy vulnerability assessment* and the South African Local Government Association’s *Let's Respond* guide to integrating climate change risks.

Further matters:

- We raise concerns about how the Paris Agreement is presented in the National Adaptation Strategy. The necessary parity between mitigation and adaptation was not adequately represented in the Paris Agreement. The National Adaptation Strategy should not legimatise the attitude towards adaptation that is presented in the Paris Agreement, but should present a nationally appropriate application of adaptation that is considerably stronger, nationally appropriate, and more meaningful.

- We ask that the glossary is given higher attention. Some definitions in the current draft are misleading, incomplete, or inaccurate.

- We believe that it would be worthwhile to expand on South Africa's climate work across the continent, for example involvement in the Committee of the African Heads of States on Climate Change (CAHOSCC), the African Group of Negotiators' African Renewable Energy Initiative (AREI) and African Adaptation Initiative (AAI), and strategies of the Southern African Development Community relating to climate change, water and agriculture. We have developed a powerful set of skills in these areas over recent years and we feel that it serves our national priorities to reduce climate induced displacement in other sub-Saharan countries.

We also ask for clarity on the following:

- How have provincial and district municipality adaptation strategies been used to inform the National Adaptation Strategy?
- As new district level adaptation strategies are being developed, how will they be used to inform the National Adaptation Strategy?
- Will room be created for regular updates of the strategy as science and experience provide us with better information?
- We understand that the chapter on financing the National Adaptation Strategy was not complete at time of release of the current draft, and ask for clarity and further opportunity to make input into this matter.
- There is need for more clarity on the issue of migration as a result of climate change and environmental impacts, both internal displacements and influx of environmental refugees from neighbouring countries. How will the Strategy address this?
- Climate change will not only present negative impacts but also opportunities. How does the Strategy intend to address the envisaged opportunities as highlighted in some research papers including the Second National Communication to the UNFCCC.

Furthermore, we invite the state to engage with a panel of sustainable economic development practitioners that we are willing to make available to provide further input on the myriad of other sustainable development options available to us as a nation.

Sincerely,

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