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SUBMISSION ON THE DRAFT LOW GREENHOUSE GAS EMISSION DEVELOPMENT STRATEGY (LEDS)

BACKGROUND

BUSA is a confederation of business organisations including chambers of commerce and industry, professional associations, corporate associations and unisectoral organisations. It represents South African business on macro-economic and high-level issues that affect it at the national and international levels. BUSA's function is to ensure that business plays a constructive role in the country's economic growth, development and transformation and to create an environment in which businesses of all sizes and in all sectors can thrive, expand and be competitive.

As a principal representative of business in South Africa, BUSA represents the views of its members in several national structures and bodies, both statutory and non-statutory. BUSA also represents businesses' interests in the National Economic Development and Labour Council (NEDLAC).

INTRODUCTION

BUSA welcomes the opportunity to comment on the draft LEDS. Business supports the rationale for the submission to the UNFCCC of a LEDS for South Africa that encompasses existing and planned policies and measures being implemented or planned for implementation and does not introduce any increased ambition.

Notwithstanding the above, BUSA has some concerns with the draft which are further explored below.

COMMENTS

LACK OF A CLEAR STRATEGY

The strategy must link the measures to the two key policies for South Africa in respect to the country's actions to address climate change. The relationship between the objectives and vision of the LEDS and the measures to reduce emissions, build climate resilience and drive low emissions development must be clear throughout the document.

BUSA cannot see clear linkages between what is covered in the LEDS and the National Climate Change Response Policy (NCCRP) and the Nationally Determined Commitments (NDCs). Both are covered in the draft, however, as arguably the key guiding documents, it would be useful to clearly link the measures and interventions to these two documents. This will help keep the narrative of the document to its stated purpose of how various sectors of the economy would implement policies and measures to reduce emissions up to 2050.

The LEDS document laid out a number of objectives that it aimed to address, however not all these objectives were clearly addressed. Particularly, on page 17 the stated objectives to:

- Provide strategic guidance as to which measures will be implemented to reduce GHG emissions in the short, medium and long-term;
- Provide a high-level plan on how South Africa would transition to a lower carbon development economy in a “just transition” manner; and
- Building the low carbon development culture”.

It is uncertain in the document how are these objectives are going to be addressed. The plan and way forward on these objectives is unclear.

It is mentioned several times throughout the document that South Africa going to make a fair contribution to lowering the global increase in temperatures. It is also stated that the document will “*articulate the path going forward in order to place the country on a low-carbon trajectory, while at the same time ensuring broader socio-economic development...*”, however the document fails to set a clear path or show a clear collective plan and how the measures will achieve these objectives. In short, the vision and objectives are not clearly substantiated through the rest of the document.

The narrative should translate all current and planned policies and measures into the roadmap for how South Africa will achieve low emissions development. The current draft fails to make this link clear.

COVERAGE OF THE LEDS

BUSA believes that there are some policy instruments missing from the LEDS. Work was done in conjunction with the National Business Institute (NBI) and the Department to show the climate change policy progression of South Africa at the last two UNFCCC COPs (23 and 24). To the extent that this information may be useful, BUSA directs the Department to the relevant infographic here <https://nbi.org.za/wp-content/uploads/2017/11/DEA-NBI-Infographics-2-20171102-WEB.pdf>



LIST OF MEASURES

Measures to drive low carbon development for each key sector are listed however, these are broad and far-reaching in some cases and includes measures to address (reduce) emissions and build climate resilience. While these measures are needed and should be covered in the document, these are not necessarily the same measures that would drive low emissions development.

The document is inconsistent; on page 10 it states that the LEDS are being developed to also facilitate the implantation of the mitigating part of the country's NDC... but the sectoral measures listed include measures to build resilience to climate change which is outside of mitigation activities. BUSA supports the inclusion of measures to build climate resilience and suggests therefore that the LEDS not propose to focus on mitigation measures.

As mentioned above, the document should include how the progress of these measures will be tracked and how these measures will be translated into realistic actions that can be tracked.

BUSA does not believe that Table 1 on page 25 should be included in the strategy. Though the strategy includes planned policy, including specific sectoral goals from a long-debated strategy outside of the Departments control is ill advised. BUSA has also stated that the opportunities in respect of energy efficiency post-2015 are being overstated. Many industries have already exhausted energy efficiency opportunities in response to high electricity prices, load shedding and in response to calls from DoE and Eskom for increased demand-side management and energy efficiency.

MEASUREMENT

The document is silent on how the progress towards the achievement of low emissions development will be measured.

As a dynamic document that "will be updated regularly based on changing climate information or national plans and programmes" and "in response to social, economic and policy developments over time." BUSA avers that implementation must be regularly monitored, not only updated. It is crucial that progress must be measured. The changes should be reflected in the updates and these updates should also indicate remedial policies and measures to ensure the achievement of the strategy.

The progress of achievement of the measures must be shown in updates, therefore how the measures will be measured should be included. The document should be updated to include all relevant polices and their status and progress, for example, the carbon tax alignment is said to be post-2020 in the current document whereas, by virtue of the imminent promulgation of the Carbon Tax Act, this will occur post-2022.

CONCLUSION

The Low Emission Development Strategy is an arguably incomplete summary document. It outlines some of the current policies and measures to address climate change as well as a sectoral and industry breakdown thereof.

However, there is no conclusive strategy that outlines how all these procedures and policies will work together to reduce greenhouse gas emissions, achieve low emissions development and meet the requirements laid out by the UNFCCC. The path to achieve the objectives and vision and plan and way forward is not clearly articulated in the document.

BUSA therefore recommends these concerns are address in a revision of the strategy, and that the revision is consulted on.

BUSA remains committed to working with the Department and is accordingly willing to meet with the Department to discuss this submission and subsequent redrafting of the LEDSD.