



Centre for Environmental Rights

Advancing Environmental Rights in South Africa



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Dear Mr Makwarela

WRITTEN SUBMISSIONS ON THE STAKEHOLDER BRIEFING DOCUMENT ON THE CLIMATE CHANGE MITIGATION POLICIES AND MEASURES (PAMS) APPROACH AND METHODOLOGY

1. We are writing to you with reference to the recent Climate Change Mitigation Policies and Measures (PAMs) stakeholder briefing document (“Briefing Document”) and presentation on the approach and methodology for the PAMs analysis, delivered in the stakeholder consultation session held on the 31st July 2017.
2. The Centre for Environmental Rights (CER) was notified of the consultation process, Briefing Document and presentation in an email of Thursday 3 August 2017.
3. We note that the proposed PAMs analysis intends to, *inter alia*, estimate the individual and aggregate effect of existing, enhanced and potential climate change mitigation policies and measures, as contemplated in the National Climate Change Response White Paper (NCCRWP).
4. CER expresses its support for the PAMs study, in particular its objectives, and the proposed approach and methodology as set out in the Briefing Document.
5. We confirm CER’s intention to participate as a stakeholder in this process. We therefore request that you keep us updated and notified of relevant developments during the “project term”, particularly the second stakeholder engagement later in 2017, as indicated in the Briefing Document.
6. While we do not intend to make detailed submissions on the PAMs approach and methodology, or on the analysis itself, at this stage, we would like to highlight one observation, which we are of the view is of fundamental

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importance to the accuracy of the modelling, and the scenarios for this study. Our concern is that the approach and methodology exclude certain relevant and important greenhouse gases (GHGs), in the delineation of “*Greenhouse Gas Emissions for the purpose of this project*”.¹

7. The Briefing Document stipulates that the “*GHG emissions quantified and accounted for in this project will be limited to the gases, sectors and sources covered in South Africa’s National GHG Inventory submitted in its first Biennial Update Report to the UNFCCC in 2014, covering the period 2000 to 2010*” and that “[o]nly gases covered in the inventory ... will be reported on (CO₂, CH₄, N₂O)”.² This effectively means that relevant GHGs will be excluded from the analysis.
8. Although the Briefing Document states that gases covered in South Africa’s National GHG Inventory submitted in its first Biennial Update Report to the UNFCCC in 2014 (“the Biennial Update”) will be accounted for, it then appears to expressly limit the scope to just three GHGs – namely carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). According to the Biennial Report,³ “*the inventory includes a breakdown of the country’s 2010 anthropogenic GHG emissions, and removal by sinks, of all GHG’s not controlled by the Montreal Protocol. The GHG’s include: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆)*”.⁴ It is therefore not clear why only CO₂, CH₄ and N₂O are being considered.
9. Furthermore two critical pollutants with significant climate impacts, which are not accounted for in the Biennial Report, will be excluded from the PAMs analysis – these are black carbon and hydrochlorofluorocarbons (HCFCs). A 2009 study by Baron, Montgomery and Tuladhar, titled “*An analysis of black carbon mitigation as a response to climate change*”⁵ finds that the reduction in black carbon emissions represents a potential near term opportunity to postpone the effects of rising GHG levels on the global climate. The delay in global warming offered by reducing black carbon emissions creates a window of opportunity for the research and development of new technologies that lower or eliminate GHG emissions at a cost far less than that of current technological options.
10. In relation to HCFCs, these have a powerful warming effect and high global warming potential. In October 2016, the Montreal Protocol on Substances that Deplete the Ozone Layer was amended to phase-out the use of HCFCs.⁶
11. In light of GHG’s recently being declared as national priority air pollutants,⁷ the National GHG Emission Reporting Regulations,⁸ as well as the significant climate change impacts of black carbon and HCFCs, and the potential fundamental mitigation benefits of reducing these emissions as indicated above, kindly advise what is the rationale for limiting the scope of GHG’s in the study to CO₂, CH₄, N₂O?
12. In the circumstances, we strongly recommend that the scope of GHGs to be considered in the PAMs analysis be revised and extended.
13. We look forward to hearing from you and to further engagement in relation to this process. Kindly keep us updated.

¹ Page 4, Briefing Document.

² See the scope limitations under ‘Delineating National Greenhouse Gas Emissions for the purposes of this project’.

³ Available at <http://unfccc.int/resource/docs/natc/zafbur1.pdf>.

⁴ Page 55. The GHG scope is in accordance with the ‘Guidelines for the Preparation of National Communications from Parties not included in Annex 1 to the Convention’, FCCC/CP/2011/9/Add.1, available at

<http://unfccc.int/resource/docs/2011/cop17/eng/09a01.pdf#page=39>.

⁵ Available at

http://www.copenhagenconsensus.com/sites/default/files/ap_black_carbon_baron_montgomery_tuladhar_v.4.0.pdf.

⁶ <http://ozone.unep.org/en/handbook-montreal-protocol-substances-deplete-ozone-layer/41453>.

⁷ Published on 21 July 2017, GG No. 40996.

⁸ Published on 3 April 2017, GG No. 40762.

Yours sincerely

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