

groundWork and Highveld Environmental Justice Network (HEJN)

Comments on the Steve Tshwete Local Municipality Draft
Integrated Development Plan 2017



These comments are in response to the following Draft IDP document

<http://www.stevetshwetelm.gov.za/documents/IDP/draft%202017%20%20march%20print.pdf>

*This link may change as the draft changes and new uploads are posted by the Steve Tshwete Municipality.

Updated versions of the document will be uploaded on the following page:

<http://www.stevetshwetelm.gov.za/documents.html>

CLIMATE CHANGE AND ENERGY

We would like to start with a disclaimer that the following comments, under the climate and Energy section, are made outside of a full study of the new low emission development strategic framework and action plan currently being finalized so there is a possibility of these comments being addressed in the final documents.

- 1) In terms of the IDP, one of the strategic objectives of the municipality is to provide a safe and healthy environment for the community. Then Vision 2030 plan, says the municipality wants to encourage a shift towards a renewable energy sources as they recognize the limitations of the dwindling coal reserves.
 - a) The Municipality is over dependent on fossil fuel generated electricity and therefore the municipality has a large carbon footprint (82% of emissions are electricity based) and no clear plans are highlighted in the IDP on how the Municipal authority intends to distance itself from this current dirty energy dependence. We suggest that the municipality embarks on an aggressive renewable energy (RE) procurement programme that will trigger the growth of RE that would be owned by the municipality and the people within the Municipality. It should be that those consuming electricity are those also owning it, and through this have control over production, consumption and placing this energy into the market place. This programme must ensure the participation of people who most need affordable, clean and employment creating energy options.
 - b) Considering that 9% of energy is consumed by households, with even more being used by middle and high income earners, it is important for the municipality and other stakeholders, to plan and promote a community driven energy system. The plan should focus on phasing out the reliance on coal generated electricity and turn to renewables for energy. The plan should speak to issues on climate change, other pollutants and how moving to renewables can reduce our carbon footprint. It should also seek to deal with energy poverty at community level and address the problem of energy loss in the system and energy efficiency both at municipal and household level. The plan should have strong emphasis on dealing with energy needs at household and therefore substitute the use of dirty energy sources.
 - c) Therefore, the municipality needs to appoint a team which will coordinate the transition from coal generated electricity to renewables, and start a process of engagement with communities and other stakeholders to develop a plan.

- 2) The IDP explicitly highlights the local authorities concerns on Climate Change but the activities contained in the Service Delivery and Budget Implementation Plans (SDBIPs) are unclear. They show no indication of deliberate action across departments towards climate proofing service delivery/development. Clearly the Municipality still needs to fully mainstream climate change concerns into its IDP.

- 3) The IDP makes mention of some mitigation measures that will be undertaken once the low emission pathway document is complete but there is little or no mention of an Adaptation strategy or a climate vulnerability assessment that has been done across the Municipal area. We are informed that Urban earth a consulting company was appointed by the Department of Environmental Affairs to do a vulnerability assessment with Nkangala District Municipality; we would have wanted to see that reflected in the IDP
- 4) From an institutional and structural perspective, no mention is made of adaptation capacity or a unit in charge of adaptation. We would like to suggest that, if there is a climate change unit, it be housed in the Mayor's office due to its cross-sectoral and political nature.
- 5) There is a lot of mention of the Green Economy throughout the IDP document but no real achievable activities are outlined under the LED section of the document. We suggest a stand-alone Low-Carbon **People's Economy** strategy be drafted with a focus on the low hanging fruits in the areas of Waste, Transport, energy and built environment. In essence, the **People's Economy** strategy should be pro-poor and encourage the participation of new entrants and not Tenderpreneurs). Instead, the municipality should turn to community-based initiatives that usher SMMEs from previously disadvantaged communities into the mainstream, therefore creating a low carbon economy. The Local Economic Development department should be both capacitated and financed to oversee the implementation of such a strategy.
- 6) The Municipality will need to finance its intent towards a low carbon economy through both the equitable share system by mainstreaming climate change into all departmental activities through the SDBIPs (as earlier mentioned), but also through seeking financing from both national and international bilateral and multilateral funds such as the Adaptation fund and Green Climate Fund.
- 7) The spatial development Framework as presented in the IDP is more socio-economic oriented and makes little or no mention of the environmental management frame of the Municipal area. We suggest that the framework should flag environmental hotspots such as Air pollution sources and vulnerable areas, soil and water contamination areas as well as Climate Change vulnerable areas. Through the Spatial Planning and Land Use Management Act (SPLUMA), there is a need to identify sensitive or protected areas in terms of heritage, biodiversity, cultural or for the protection of the environment, and declare these non-mining/ protected areas. This will address the challenge posed by the scarcity of land and the competition for land between agriculture and mining.

ENVIRONMENTAL HEALTH (EH)

- 1) Air pollution from fossil fuels presents serious risks to public health. Air pollution is now responsible for over 6.5 million premature deaths per year¹. Exposing people to harmful levels of

¹[http://thelancet.com/journals/lancet/article/PIIS0140-6736\(16\)32124-9/fulltext](http://thelancet.com/journals/lancet/article/PIIS0140-6736(16)32124-9/fulltext)

air pollution increases the risks of heart disease, lung cancer, respiratory diseases and stroke². The concentrations of ambient PM_{2.5}, which consists of primary emissions and secondary PM_{2.5} from the precursor gases SO₂ and NO_x, is generally very high in the Highveld Priority Areas (HPA) and in particular Emalahleni. Generally, the annual average PM_{2.5} concentrations in the whole HPA mostly exceeded the World Health Organization (WHO) guideline of 10 µg/m³ and the National Ambient Air Quality Standard (NAAQS) of 20 µg/m³ for the period 2012-2015. A reduction in fence-line pollution is the first step in our journey to reducing climate impacting greenhouse gas emissions.

- 2) The Highveld Priority Area municipalities needs an improved air quality management and monitoring system. The monitoring system is not functioning optimally, with many stations not reporting. Current air quality monitoring and data is being done by the Department of Environmental Affairs. The data collated by DEA is sometimes unreliable for use by the municipalities. Environmental real-time monitoring data is required to push for enforcement and improvement in standards and compliance by industry. The municipality has as its core function the responsibility to deal with air pollution. By law, it should have an Air Quality Officer (AQO) and an Environmental Management Inspectorate (EMI) as part of their staff. Within the environmental department, a dedicate team should be appointed to deal with air quality issues in the area. The municipality has established two (2) monitoring stations, to collect data for specific pollutants and monitor ambient air quality. As they need to have the team/unit that will deal with monitoring, data collection and management, enforcement of regulations and awareness campaigns. They also need to draft and have an Air Quality Management Plan (AQMP), as well as, environmental by – laws. The local authorities must develop and implement policies aimed at reducing pollution. The health sector needs to step up and be part of the process of developing a continuous monitoring process that shows the link between pollution and health. The data for pollution related diseases should be made public, with specific interventions to deal with it. An air quality team must be appointed and must work closely with the health sector to deal with impacts of pollution on the health of the people.
- 3) Environmental health services themselves (health systems, hospitals, clinics etc.) need to promote greater sustainability and environmental health in the health sector to strengthen health systems. Hospitals and health systems can achieve this comprehensive framework by committing to strive for greater sustainability, and contribute to improved public environmental health. This can be done by identifying and addressing key areas within health care systems that have an environmental and health impact. The [Global Green and Healthy hospital](http://www.greenhospitals.net/) (GGHH) <http://www.greenhospitals.net/> provides a framework for this and recognizes the connection between human health and the environment, and demonstrates that understanding through its governance, strategy and operations.

This will help connect local needs with environmental action and practices, primary prevention, by actively engaging in efforts to foster community environmental health, health equity and a green economy. The GGHH principles contain ten interconnected goals involving: Leadership,

²http://www.who.int/phe/health_topics/outdoorair/outdoorair_aqg/en/

Waste, Chemicals, Pharmaceuticals, Building, Purchasing, Transportation, Energy, Water and Food. Each contains a series of Action Items that hospitals and health systems can implement.

Conclusion for EH section:

The development of the policy must be guided by overarching principles detailed in key regulatory and policy documents, including the constitution and the principles outlined in the National Environmental Management Act (Act 107 of 1998). Key principles that relate specifically to civil society include:

- *(c) Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons.*
- *(d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.*
- *(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.*
- *(g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognizing all forms of knowledge, including traditional and ordinary knowledge.*
- *(h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.*