Climate Policy Coherence and Institutional Coordination: Clarifying Institutional Responsibilities in South Africa

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The BASIC Project is a capacity strengthening project – funded by the European Commission – that supports the institutional capacity of Brazil, India, China and South Africa to undertake analytical work to determine what kind of climate change actions best fit within their current and future national circumstances, interests and priorities. Additional funding for BASIC has also been kindly provided by the UK, Department for Environment, Food and Rural Affairs and Australian Greenhouse Office. For further information about BASIC go to http://www.basic-project.net/
About BASIC
The BASIC Project supports the institutional capacity of Brazil, India, China and South Africa to undertake analytical work to determine what kind of national and international climate change actions best fit within their current and future circumstances, interests and priorities. BASIC has created a multi-national project team linking over 40 individuals from 25 research and policy institutions, the majority based in BASIC countries. Project activities comprise a mix of policy analysis, briefings, workshops, conferences, mentoring and training clustered around five tasks lead by teams as follows:

- Task 1 – Mitigation and sustainable development (China Team);
- Task 2 – Adaptation, vulnerability and finance (India Team);
- Task 3 – Policy coherence and institutional coordination (South Africa Team);
- Task 4 – Designing international climate change policy and enhancing negotiations skills (Brazil Team); and
- Task 5 – Creation of developing country expert group/mechanism on a long term basis (All Teams).

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About this Paper
The views and opinions expressed in this paper have been put forward by the BASIC Task 3 Team to advance future climate policy discussions and contribute to capacity development and do not express the views or opinions of the funders or the BASIC Project Team as a whole. Task 3 is coordinated by the BASIC South Africa Team, which comprises: Shirley Moroka, Department of Environmental Affairs and Tourism, Mike Goldblatt, Julie Middleton and Gillian Sykes, Palmer Development Group, South Africa, Catherine Warburton, Andrew Gilder, Sibusiso Shabalala and Melissa Basterfield, IMBEWU Enviro-Legal Specialists (Pty) Ltd., Johannesburg, Shirene Rosenberg, City of Cape Town and Harald Winkler Energy Research Centre, University of Cape Town. The authors wish to thank the BASIC Team in particular, Paul Curnow, Baker and McKenzie, Australia and Imme Scholz, German Development Institute,(d.i.e.) for comments and guidance on previous drafts. This does not imply support for the views expressed in this paper by any of the individuals and organizations. Authors contacts: mike@pdg.co.za or julie@pdg.co.za

Other papers produced by BASIC Task Team 3 include:

- A Prompt Start for the CDM? Lessons from Early Experiences from South Africa, Shirene Rosenberg, The City of Cape Town, South Africa
- Climate Policy Coherence and Institutional Coordination for South Africa: An Overview of Challenges and Responses: Mike Goldblatt, Palmer Development Group (PDG) South Africa
Executive Summary

The pervasive nature of climate change, necessitating multiple levels of governance, poses formidable policy coherence and institutional co-ordination challenges. Additionally, climate protection policies must command widespread support if they are to be implemented effectively over the long-term and this generates extensive stakeholder engagement. Policy and institutional coherence is increasingly recognized as one of the core challenges facing climate policy facing all countries, developed or developing.

The National Climate Change Coordinating Committee

South Africa provides a useful case study of approaches towards coordination of climate policy development and implementation that may provide useful lessons for other countries. South Africa’s National Climate Change Coordinating Committee (NCCC) is a central institution in this coordination. The NCCC provides a forum for wide ranging stakeholder input into the policy development process and also acts as a means to disseminate information to stakeholders. These stakeholders include other spheres of government as well as private sector and NGO organizations.

The NCCC is situated within the context of increasingly strong inter-departmental climate policy coordinating structures at the national level, including a high level Inter-Ministerial Committee. There are also strong inter-governmental planning processes and structures that allow for the integration of national policy across government. Other environmental and sustainable development programmes are planned within these systems and they provide a well developed channel for climate policy integration and implementation if used appropriately.

An emerging climate policy network

Outside of the formal mechanisms established by government for climate change coordination and integration, a range of stakeholders outside of government play crucial roles in addressing climate change issues. These stakeholders do not work in a coordinated fashion, often they work at cross-purposes or even in opposition to each other. However, they do occupy the same policy space, interact with each other, share ideas and compete for influence over government and over other levers of power. They generally also share a relatively common understanding of the climate change problem but will often propose differing solutions and responses.

The combination of the formal state structures, established government policy, and informal stakeholder interactions around climate change have created a policy network around this issue in which much of the information flows and debates around climate change policy occurs. An understanding of this network is important in understanding what climate policy responses are likely to emerge successfully in the country and in understanding the various power relations that will determine future action in the country. In this light a schematic overview of the key role-players in the network is provided in the paper.

Although only an initial abstraction the policy network “map” highlights some important issues. For example, it is clear from the map that government, and national government in particular, sits at the heart of the network. Most other actors interact with, or via government. This demonstrates the crucial role of adequate capacity at certain points within government and also demonstrates those points where policy interventions or support are most likely to be useful. At the same time there is an emerging “sub network” of local government in which municipalities are sharing
information and expertise between themselves within going through national government as an intermediary.

It can also be seen that the new Air Quality Act requires all three tiers of government to oversee and implement it and therefore presents an obvious mechanism for formal integration of greenhouse gas management measures across the tiers of government. On the other hand the renewable energy policy of the DME probably does not provide a similar cross government policy platform.

The network also shows the importance of a small number of well resourced and influential academic or research organizations. These organizations have important roles to play in keeping the network informed, in ensuring that the network is fed with new policy insights and options, and in providing “impartial” support.

The importance of the NCCC and the DNA can be seen. These coordinating institutions are able to embrace wide sections of the climate policy network and act as one of the few formal means of allowing actors in the network to engage in a structured and constructive manner.

Finally, it is important to note who is missing from the network. Particularly important, given the noted influence of government within the network, are the two key coordinating structures of government, the Presidency and the National Treasury. In addition to occupying positions of cross-sector coordination, these are also, arguably the two most influential components of national government.

**Strengths of the South African policy network**

One of the major strengths of the NCCC in particular, and the climate policy network as a whole, is its evident accommodation of a broad range of stakeholder interests. This partly stems from the generally inclusive approach of the South African government, which has attempted to redress the closed and exclusive approach of the apartheid state. The NCCC is an open forum with few barriers to entry. Similarly, the South African UNFCCC delegations strive for the inclusion of a range of interests.

The NCCC is also, on the whole, a highly transparent forum, as are other elements of climate policy making. The NCCC, and associated institutions within the network allow for relatively good access by stakeholders to key decision makers. Stakeholder organizations have many opportunities to state their case, to present information to government and to lobby for their positions. The NCCC also assists in equalizing the influence of stakeholders with lower resourced groupings having as equal access to the forum as more powerful interest groups. In particular, the current policy network, both the formal NCCC and informal elements, have served to foster good links between research institutions and policy makers. This has provided support to government when internal capacity has been lacking.

Government has also recognized the need for parallel internal and external policy processes. The establishment of the Government Committee on Climate Change (GCCC) (since superseded by the Inter-Departmental Committee (IDC)) has been a major advance in inter-departmental coordination of climate policy. Although there is some overlap between the GCCC and the NCCC they serve different purposes: the GCCC acting as a means of policy coordination and a mechanism to balance national interests across departments, and the NCCC acting largely as a forum for information sharing, consultation and external policy debate.

**Challenges for SA policy networks**

Despite the emergence of a climate policy network, with the NCCC at its centre, there remain a number of challenges to the coordination of climate policy and action. The first challenge is the integration or main-streaming of climate policy into the highest
levels of economic planning. This will probably only occur with some form of participation by the National Treasury and the Presidency in structures or processes addressing climate change policy.

A related limitation with the current NCCC arrangement is that the committee primarily advises the DEAT. However, the DEAT itself has limited influence over energy or industrial policy or over key levers of spatial and infrastructure planning. There are arguments for the NCCC’s mandate to be extended to providing advice to the Inter-ministerial Committee on climate change or possibly to a combination of government departments including at least the DEAT and the Department of Minerals and Energy. In particular, the NCCC appears to have limited impact on direct energy planning. Mechanisms should be sought to enhance the links between the climate policy and the energy policy networks to allow for greater influence of climate considerations in the country’s energy planning and policy.

The existence of a well developed mechanism for vertical integration of development and environmental planning between the national, provincial and local spheres of government, suggest that these mechanisms could be better utilized to encourage the flow of information between the spheres of government.

Linked to the above is the need for a strengthening of internal resources within the DEAT. The management of complex domestic and international climate change policy processes, intergovernmental coordination and continual stakeholder consultation and engagement requires significant human resource capacity. The DEAT at present does not have enough resources to allow staff members to adequately address themselves to these tasks. Although other actors in the policy network do support these processes sufficient core capacity is still required within national government.

Although the NCCC allows for an open and equal platform for stakeholders it is likely that the vested interests of some large private and parastatal organisations have greater political power than other stakeholders within the climate policy network. The current NCCC arrangements do create the conditions for regulatory capture – although these are mitigated by access to the committee by counter-balancing forces and by a strengthening interdepartmental network. This is not meant to imply that these more influential organizations play a negative role in the NCCC; in many cases they offer important resources and insights to the forum as well as progressive approaches to addressing climate change concerns. However, the imbalance of power in the climate change policy debate in South Africa cannot be ignored when attempting to understand the dynamics of climate policy development and likely outcomes.

The research capacity that exists remains limited and concentrated in a small number of institutions. Given the importance of such capacity to the policy network this research network should be expanded and strengthened. Recent work undertaken by the Department of Science and Technology is providing support to this and also to improving the relationship between research and national needs around climate change.

A final limitation of the NCCC and the climate network more broadly is that it is largely a policy network and there is limited evidence of implementation efforts being initiated or integrated across departments or actors within the network. Effort should be taken to move towards the next step of integrating actions on climate mitigation and adaptation across departments and of integrating development programmes and climate change responses. Clear potential exists in areas such as low income housing policy where improved insulation, building orientation and use of solar water heating can have benefits for the quality of life of householders, value of housing stock and can reduce greenhouse gas emissions.
The move from a policy network to an implementation network will herald the real integration of climate change and sustainable development considerations into government practice.
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Abbreviations

DEAT Department of Environmental Affairs and Tourism
NCCC National Committee on Climate Change
GCCC Government Committee on Climate Change
IDC Interdepartmental Committee on Climate Change
IMC Inter-Ministerial Committee on Climate Change
DTI Department of Trade and Industry
DWAF Department of Water Affairs and Forestry
DFA Department of Foreign Affairs
DME Department of Minerals and Energy
DST Department of Science and Technology
NT National Treasury
SACAN South African Climate Action Network
DNA Designated National Authority
CDM Clean Development Mechanism
DPLG Department of Provincial and Local Government
DoA Department of Agriculture
Doh Department of Health
DoT Department of Transport
ICLEI International Centre for Local Environmental Initiatives
EIMP Environmental Implementation and Management Plans
CEC Council for Environmental Coordination
AQMP Air Quality Management Plan
IDP Integrated Development Plan
1 Background

Task 3 of the BASIC Project addresses the challenge of policy coherence and institutional coordination with regards to climate change policy and implementation responses. The task is made up of three sub-components, all from a South African perspective, focusing on:

- The institutional responses to climate change in South Africa
- Lessons from the implementation of the Clean Development Mechanism in South Africa; and
- Legal and institutional issues related to the UNFCCC and the Kyoto Protocol and their implementation via domestic legislation in developing countries.

This paper is a response to the first task, a consideration of institutional responses to the climate change problem in South Africa. The paper does not purport to be an in-depth and comprehensive consideration of this issue but rather aims to provide a broad overview of the institutional response and dynamics affecting the creation and implementation of climate change policy in South Africa. It is hoped that this may stimulate further debate or research within South Africa and the other BASIC countries and raise some considerations for improved institutional arrangements for addressing climate change. Discussions around the paper, and the other components of Task 3, will also contribute to the sharing of information and experiences across the participants from the BASIC countries and associated institutions.

1.1 Climate policy and institutional coordination

Greenhouse gas emissions arise from virtually all economic sectors while climate change impacts are even more diffuse as they will be felt by all countries, sectors, social groups and by future generations. The pervasive nature of climate change, necessitating multiple levels of governance, poses formidable policy coherence and institutional co-ordination challenges – nationally and internationally. Additionally, climate protection policies must command widespread support if they are to be implemented effectively over the long-term and this generates extensive stakeholder engagement. Thus achieving policy coherence across all policy areas relevant to climate change is difficult, especially in the energy, agriculture and forestry sectors where the influence of environmental ministries (especially in developing countries) tends to be weak. Policy coherence (Patrinos and Bamzai, 2005) as well as institutional coherence is increasingly recognized as the core challenge facing climate policy.

A further rationale for understanding the policy process and institutional arrangements in any particular country is to assist in making climate change related research policy-relevant and in determining where within the policy making system the results of policy research will have most influence (Turnpenny et al, 2005).

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In developed and developing countries buzz words such as the need for “joined up” government\(^2\) abound but all too often one branch or tier of government is unaware of what the others are doing - or when they are aware, little can be done for lack of clarity about institutional responsibilities. On a positive note, policies, practices and institutional mechanisms that advance policy coherence and coordination in respect of climate change are emerging in many countries although they are at an early stage of institutional development.

A critical part of enhancing the capacity of developing countries for future actions is to pay more attention to legal, procedural and institutional issues relevant to policy coherence and institutional coordination. As part of the BASIC Project’s emphasis on activities to understand and better support capacity needs of in-country institutions this paper therefore focuses on institutional issues raised in the South African context by the establishment of its National Committee on Climate Change (NCCC) and the wider insights its operation provides. The issue of joined up government has been recognized as a generally important one for governance in South Africa and has been formalized under the Intergovernmental Relations Framework Act of 2005 (RSA, 2005b).

1.2 Scope of the paper

Internationally an important mechanism for achieving domestic policy coherence and institutional coordination has been the establishment of national climate change committees or similar coordinating structures, comprising all relevant ministries and in many cases stakeholders. The impact and effectiveness of these committees has been variable. Although some institutional problems with these new coordinating structures are “teething problems” others are more fundamental and hamper future implementation efforts, particularly with regards to complex mechanisms such as the CDM, as well as hinder the capacity of countries to formulate coherent national positions in negotiations.

A national coordination committee of the kind described above has been established in South Africa. Termed the National Committee on Climate Change (NCCC), it has been South Africa’s key instrument in facilitating the development and negotiation of climate change policy and strategy. While the NCCC is not a policy making body \textit{per se}, it has played an important role in facilitating both intergovernmental coordination and stakeholder input into climate change policy and strategy.

This paper discusses the functioning of the NCCC in some detail as well as the institutions and “policy network” associated with it and with which it interacts. The description of the NCCC is followed by further discussion on the horizontal and vertical coordination of climate change policy and implementation within state institutions. This intra-governmental coordination is illuminated with reference to the implementation of vulnerability and adaptation response measures.

Before describing the South African situation the paper briefly discusses the character of the climate change problem and the difficulties it imposes on policy discussion, policy and strategy development, and implementation. This is followed by the South Africa case study focused on the NCCC as a practical example of the institutional response to these challenges and their successes and failures. The paper then closes with some preliminary conclusions. The conclusions outline some lessons from the South African experience of climate policy coordination and also raise possible areas of improvement in the South African situation. It should be noted that these conclusions are tentative and are seen more as providing a starting point for debate and additional research than as definitive recommendations.

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2 In South Africa this concept is typically referred to as “co-operative government” as expressed in Chapter 3 of the Constitution of the Republic of South Africa (RSA, 1996)
2 Institutional Analysis and the Character of Climate Change Policy

The character of the climate change issue is a particular one and poses substantial challenges to policy formulation and to the development of societal consensus and institutional coordination.

2.1 The institutional challenge of climate change

As Tompkins and Adger (2003) note “creating national climate policy is challenging; long time frames, scientific uncertainty about impacts and about social and economic futures conspire to test the abilities of existing decision making structures. Specific difficulties arise because national climate policy deals with climate change impacts generated through actions taken both within and outside most countries. The impacts could be seen as a form of externality generated across national boundaries. It is clear that there are many causes of climate change and there are many solutions which depend to a degree on how societies and individuals in the present day are willing to trade-off their consumption and lifestyles for speculative improvements in the wellbeing of future generations.”

The institutional challenges posed by the points raised above are categorized and expanded upon below:

- **Long term**: there are long time-frames associated with climate change impacts as well as many adaptive and mitigation responses. These time-frames extend into decades and even centuries ahead.
  - **Policy constraints**: few, if any, other policy issues dealt with by government play themselves out at such a temporal distance and the mechanisms of government are not structured to deal with such long term issues. The majority of the core planning processes of governments, such as medium term budgeting; and development planning documentation typically extend three or five years into the future. Even long term visioning by government departments typically only means at most a 20 year time horizon.
  - **Planning tools**: the planning tools and approaches used by government planners are not well suited to long term challenges. For example, standard economic planning methods, as an example of a key planning tool, are not well suited to long term climate change analysis. The problems of discounting future impacts and benefits of current actions, particularly in the context of uncertain and probabilistic scenarios, are beyond the standard economic planning tools of most government agencies.

- **Cross sectoral**: climate issues cut across all sectors of society and government. This is not a problem unique to climate change and many policy issues face the constraint of state structures organised around particular subjects or constituencies which are not well equipped to address problems which cut across such artificial boundaries. There are, in consequence, many planning and communication tools designed to manage cross sectoral policy questions. However, it should be noted that climate change is particularly complex, and has the dimensions of both mitigation and adaptation which cut across virtually all of government.

- **Multi-disciplinary**: an understanding of climate change implications and policy responses requires a cross disciplinary approach which includes the science of climate change; economic assessment and planning; organisational
development and social planning; and others. There are few policy units in government or elsewhere which have all of these skills. This implies the need for mechanisms for government decision-makers to draw on a range of social resources.

- **Strong interest groups with small numbers of losers and many dispersed winners:** there are particularly strong interest groups in the climate change debate. In particular there are well organised and vested interests in the energy and transport sectors where future climate change policies pose potential threats to current ways of doing business. On the other hand, those who stand to lose the most from climate change impacts, such as subsistence farmers or poor coastal communities, are often the most dispersed, and least organised and resourced members of society.

  - **Scientific uncertainties:** Despite growing scientific consensus there are remaining uncertainties around the mechanisms and implications of climate change. These also provide some space, albeit a shrinking one, for groups with vested interests to challenge the foundations of climate change concerns.

- **National and international disjuncture:** the global problem of climate change, despite supra-national institutions, is ultimately one that will be addressed through the actions of individual nations. At this stage there remain many differences between the national interests of countries in the short term and the global interest in the medium to long term. Government policy making is geared towards pursuing the national interest and is not well placed to balance national against global interests.

### 2.2 Institutional and policy analysis

It is clear that there are no simple or single institutional responses to the challenges presented in the above section. The policy response to climate change has to be informed and supported by a variety of institutional inter-linkages and structures; policy advocacy and awareness-raising; information gathering and research; international engagement; informal networking and social debate and other mechanisms. It is beyond the scope of this paper to explore all these mechanisms and the paper focuses on the single issue of how to coordinate a policy response across government departments.

Even this is not a simple question. The literature on policy networks, institutional analysis and organizational mapping is complex and there does not even appear to be general agreement on terms and definitions (Turnpenny et al., 2005). There are consequently a range of approaches for examining institutional interactions and policy processes.

For example, the notion of “policy networks”, which depends upon the ability to define an inter-connected network which can be distinguished from other networks by discernable breaks, has been used by some in climate policy analysis. Within such analyses there are several models of the policy learning and dynamic processes of the networks, which explain how the network actually carries out the policy process. These models include the “discourse coalition”, in which there is a shared understanding of a problem, but not necessarily the same world view (see Turnpenny et al., 2005 for a fuller description). These coalitions can be seen as groups of interests sharing a common perspective on a policy issue or regulatory framework, but with different institutional backgrounds and affiliations.

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3 A break between the network can be understood as readily discernible points or institutions around which the network forms which are not fundamental to other policy networks.
Turnpenny, et al (2005) note that such coalitions “can become highly effective in processes of policy change precisely because they organise around a common agenda for very different points of policy entry and political expertise. In climate sciences, such coalitions can effectively form precisely because they know and utilise the policy networks described there”. As will be seen below, this, to a significant but not complete degree, describes the multi-stakeholder National Committee on Climate Change (NCCC) established by the South African Department of Environmental Affairs and Tourism (DEAT), and is a useful framework to use when considering the NCCC.

Other frameworks for analysis are also possible, such as that used by the German Development Institute (d.i.e.) for analyzing environmental capacity development (see, for example, Janicke (2002)). This framework includes the following components:

- **Actors**: the proponents and opponents of a special issue
- **Strategy**: the general approach to the problem and the purposeful use of available resources to achieve long-term goals
- **Structural framework conditions**: the opportunity structure of the various actors. This includes issues relating to knowledge and information about the problem; the political and institutional conditions in which the actors operate; and the economic and technological possibilities and constraints.
- **Situational context**: specific factors of the current situation that may hinder or promote policy change and development

This approach expands the institutional analysis to include those conditions surrounding institutions, both structural and situational, that can influence policy choices and outcomes. It is recognized that this context can be crucial. For example, the situational role of forceful and charismatic individuals in policy development cannot be ignored. However, despite its evident merits, it is beyond the scope of this paper to attempt to fully describe the South African climate policy response using this framework.

### 3 South African situational analysis

It is worthwhile briefly examining whether and to what extent the generic institutional problems of climate change apply in South Africa. The table below provides a South African perspective on these issues.

<table>
<thead>
<tr>
<th>Climate Change Policy Challenge</th>
<th>South African Example</th>
<th>Application to SA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Long Term</strong></td>
<td>Integrated Development Plans of local government have 5 year time-frames&lt;br&gt;Medium Term Income and Expenditure Framework has 3 year rolling budgets&lt;br&gt;The electoral cycle at all spheres of government is a 5 year cycle</td>
<td>Strong</td>
</tr>
<tr>
<td><strong>Cross sectoral</strong></td>
<td>The standard national government planning clusters are not necessarily well suited to the integration of climate change planning for either mitigation or adaptation.&lt;br&gt;Government is organized into cross-sector clusters and has formal processes at various levels for policy integration across departments</td>
<td>Medium</td>
</tr>
<tr>
<td><strong>Multi-disciplinary</strong></td>
<td>Limited skills and expertise within government to address multiple dimensions of climate change&lt;br&gt;Limited size of climate change policy structures means that not all</td>
<td>Medium</td>
</tr>
</tbody>
</table>
Climate Change Policy Challenge | South African Example | Application to SA
--- | --- | ---
relevant skills can be represented

Strong interest groups and small numbers of losers and dispersed winners | There are strong energy intensive users and producers who have significant policy influence on government. Climate change will have direct impacts on poorly organized rural subsistence farmers. The conservation sector, also affected, is less well organized and less influential on key government departments. | Very Strong

National/International disjuncture | The interests of the South African economy (which include cheap coal and electricity; exports from resource intensive sectors; and the need for rapid industrial and infrastructure development) are not well aligned with global short term climate mitigation objectives. The country is vulnerable to climate change impacts and in the medium to long term there are growing alignments between national and international interests related to climate change. | Strong

The table shows that all the institutional and policy coordination challenges raised in the previous section apply to South Africa. The strength of their applicability differs as dictated by national circumstances.

### 3.1 Building a policy network

Over the last decade a climate change policy network has formed in response to the challenge of climate change policy coordination. This policy network is, in many respects, serving to address issues of policy coordination through both formal state structures and informal, extra-state mechanisms. This network has grown organically but in many respects it can be argued that the catalyst for the growth of the network was the formation of the National Committee on Climate Change (NCCC) and associated structures. The NCCC also remains the focus point for the policy network.

The South African government has also created a number of structures and processes for intergovernmental coordination – both vertically and horizontally across departments (these are discussed further below). While these do not specifically address climate change they do provide an important institutional context for climate change policy making. Key structures in this regard, described in more detail in section 3.3 below, are the Presidential Coordinating Committee, comprising the President, the Minister for Provincial and Local Government, and the nine Provincial Premiers. The Cabinet and Directors-General clusters are also important as they promote programme integration at national and provincial level as do the Ministerial forums between responsible line-function Ministers at national level and their respective counterparts at provincial government level. Typically, any policy decision with significant national implications will require discussion and approval at one of these fora before being adopted. Therefore, while the NCCC and its surrounding policy network may initiate and develop policy, this policy will still need to be accepted and ratified by other state structures.

Other extra-governmental processes and organizations have assisted in the development of the climate policy network. For example, the emerging network of local government actors has been facilitated by the International Centre for Local Environmental Initiatives (ICLEI) Cities for Climate Protection Programme which, in general, has worked independently from the NCCC.

#### 3.1.1 Policy framework

The most important document informing the policy framework around climate change in South Africa is the Climate Change Response Strategy (RSA, 2004). The strategy sets
out a range of measures for addressing both greenhouse gas mitigation and adaptation to the effects of climate change. The strategy makes particular reference to the integration of climate change response in government and notes that the strategy will require "that many government departments work together in a coordinated manner, to ensure that response measures are properly directed, acceptable to all and carried out with a national focus". The strategy notes that to be successful, a climate strategy must be implemented in such a way that it supports the development and service delivery objectives of government.

Indirectly, climate change policy is informed by a range of regulatory and policy documents. These include the Department of Mineral and Energy’s White Paper on Renewable Energy, their Energy Efficiency strategy, and the regulations establishing the Designated National Authority for the Clean Development Mechanism. The DEAT’s own Air Quality Management Act also makes provision for measures to address greenhouse gas emissions.\(^4\)

The evolution of climate change policy in South Africa has to be seen within the context of the particular development challenges that the country faces in its post-apartheid period. The last decade has seen a wholesale revision of national policy and governance structures. In many cases these new policy processes have had ancillary climate change benefits. For example, new policies and strategies, such as those governing transport planning, housing policy and water resources management also relate to managing climate change – from either the perspective of mitigation or vulnerability. However, these various policies and strategies have not been developed from a predominantly climate change perspective.

### 3.2 The National Committee on Climate Change

The South African NCCC was established in 1996 as an advisory body to the Minister of Environmental Affairs and Tourism. It comprises government departments, representatives from business and industry, mining, labour as well as community based organizations and NGOs.

The NCCC did not arrive as an entirely new institution without precedent or history. Some time prior to its establishment in 1996 the South African government had recognized the looming problem of global climate change. In response the DEAT established the Interdepartmental Coordinating Committee for Global Environmental Change (referred to as the ICC) whose brief was to make recommendations to government which could lead to South African policy on climate change. The work of this committee led to the issuance of a draft policy on climate change in 1993.

This policy, however, was limited by the fact that it was established by the government prior to the first democratic elections in 1994. Limited representation from wider social groupings to the policy also limited its scope and influence. A broader consultative national environmental policy process was also started shortly after the 1994 elections which implied a revision of all major environmental policies of government. Further driven by the need to develop a revised policy response to climate change as it increased in importance on the international agenda, the DEAT established the NCCC as a more representative body to replace the ICC (see Shackleton et al, 1996 for a brief history to the NCCC).

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As will be seen below, further institutional evolution continued, with the later establishment of a parallel Government Committee on Climate Change and an Inter-Ministerial Committee on Climate Change.

3.2.1 Composition of the NCCC

The NCCC is made up of invited representatives from governmental and non-governmental organisations. The committee is chaired by the DEAT and is constituted to include at least two representatives from each of the following groups:

- **National Government**: national government is represented by the Departments of Water Affairs and Forestry, Agriculture, Minerals and Energy, National Treasury, Health, Trade and Industry, Foreign Affairs, Transport, Arts and Culture and Science and Technology;

- **Provincial Government**: all nine provincial environmental departments can attend although typically only a small number do so.

- **Local Government**: until recently there was no local government representation on the NCCC. However, during June 2006 three local municipalities were invited to participate in the committee. These are municipalities who are pioneering work at the municipal level on climate change. This pioneering work includes the development of local climate change adaptation strategies, local sustainable energy strategies, and mitigation actions – some within the framework of the CDM;\(^5\)

- **Non-governmental and community based environmental organizations**: these are typically represented by environmental activist organizations, such as the South African Climate Action Network (itself an umbrella body for various NGOs) and Earthlife Africa. Included in this category would also be representatives from academic or research institutions;

- **Business and Industry**: business is typically represented by Eskom as well as by representatives from Business Unity South Africa, an umbrella organization for organized business in South Africa and/or other organized business groupings such as the Chamber of Mines;

- **Labour**: organised labour are represented, typically by a delegate from the Congress of South African Trade Unions.

3.2.2 Functions of the NCCC

The NCCC meets four times per year, unless additional meetings are urgently required. The primary objective of the NCCC is to advise the DEAT on national issues related to climate change. In support of this function the committee is also meant to communicate key issues to the various constituencies represented and assist in the development of national policy. While the NCCC offers policy support to the DEAT it has no administrative capacity of its own, relying on its members and the DEAT for administrative support. This limits its capacity to manage the ongoing demands of climate change strategy development and implementation.

The NCCC has the following formally defined functions:

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\(^5\) The role of local government in responding to climate change, with specific reference to the City of Cape Town’s experience with the CDM in South Africa is contained in BASIC Project Paper 11, Rosenberg, S., 2006: A “prompt start” for the CDM? Lessons from early experiences from South Africa.
• **Establish an agenda of work**: to set its own agenda and timetable, within a framework as determined by the Minister and Department of Environmental Affairs and Tourism;

• **Advisory to the DEAT**: to make recommendations to the Department and the Minister of Environmental Affairs and Tourism on issues related to climate change, and also to express the concerns of key stakeholders;

• **Policy support**: to design and participate in processes leading to the formulation of national climate change policy and national implementation strategy;

• **Research guidance**: to propose studies that need to be undertaken in support of national climate change policy, what their scope, timetable, budget and deadlines should be and within the limits of the available funds, advise the Department to perform them, and review and disseminate the results;

• **Communication**: to communicate developments within the national and international climate change arena to their constituencies;

• **Capacity building**: to assist with a structured process of capacity building and technology transfer and development.

The NCCC can also delegate its functions and responsibilities to sub-committees as needed.

In practice, the NCCC largely acts as a consultative forum to debate climate change policy responses. The parallel Interdepartmental Committee on Climate Change (IDC), formerly called the Government Committee on Climate Change, will typically initiate new policy recommendations. These recommendations will be debated and, where possible, agreed on at the NCCC.

However, this is not the only mechanism by which new policy measures enter the agenda of the NCCC. In some cases stakeholders have been asked by the forum to develop policy positions, for example pertaining to upcoming UNFCCC COPs, which are then debated by the full NCCC. In other cases stakeholders will bring positions or views directly to the NCCC in an attempt to place them on the government’s policy agenda. The NCCC has therefore been more than simply a forum for debate on government developed policy statements.

The NCCC has no mandate to make policy decisions. Recommendations from the Committee would be taken first to the DEAT Director General and Minister. If they are issues requiring inter-departmental approval they would also be taken to the IDC on Climate Change and then to the Inter-Ministerial Committee for approval. As mentioned above, any formal national policy or legislative decisions around climate change would then need to follow the standard route for all national policy and legislative processes.

### 3.2.3 Assessment of the NCCC

The discussion below on the functioning of the NCCC is supported by brief analysis of the NCCC’s composition and scope of work based on nine meetings of the committee held between June 2001 and July 2005 for which full minutes and records of attendance were available. Some other meetings were held during this period but the full minutes of these meetings were not readily available from the DEAT.

The NCCC is a rather unusual institution of national governance. It is not established by regulation but is nevertheless regarded as a formal, permanent institution by the DEAT and is accorded the status of a formal structure. NCCC meetings are held regularly; the committee is chaired by a senior official (currently the Deputy Director General of the DEAT, which is the second highest post in the Department); and the
committee provides direct advice on matters of national policy and international negotiations.

Representation on the NCCC

Despite being regarded as a formal structure the composition and operations of the NCCC are relatively fluid. The composition of the participants changes as needs dictate, with special interest groups being invited as required. In practice the committee also expands and contracts in response to the urgency or importance of current climate change debates.

From national government the most consistent attendance at the NCCC has been from the DEAT, the Department of Minerals and Energy (DME), Department of Agriculture (DoA), Department of Water Affairs and Forestry (DWAF), Department of Foreign Affairs (DFA), Department of Science and Technology (DST) and the Department of Trade and Industry (DTI). As can be seen in the figure below there has been less regular participation from the national Departments of Transport (DoT) and Health (DoH).

There has been rare participation from the National Treasury (NT). Over the meetings considered there was no attendance from the Presidency, the Department of Provincial and Local Government (DPLG), or the Department of Public Enterprises (DPE). These four departments are arguably key cross-sector departments. Both the National Treasury and the Presidency play important roles in the prioritization of state actions. The DPLG has important influence on local government actions and the DPE controls or oversees important state assets with significant climate change implications including Eskom and much of the state transport and logistics infrastructure.

Outside of national government there has been strong and consistent representation on the committee by Sasol and Eskom as well as organized business not within the energy sector.

There has similarly been consistent NGO representation and participation by the research and academic sector. The figure below shows the reasonably consistent participation by all the major stakeholder groupings formally represented on the NCCC apart from organized labour. This consistency is an important indicator of the

![Departmental Representation](image)

**Figure 1. Participation of national departments in the NCCC**
importance accorded the NCCC by the various participants and is relatively rare amongst similar non-statutory participatory fora in the country.

<table>
<thead>
<tr>
<th>Stakeholder Representation</th>
</tr>
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<tbody>
<tr>
<td>National Depts</td>
</tr>
<tr>
<td>9</td>
</tr>
</tbody>
</table>

Figure 2. Participation of stakeholders in the NCCC

It is apparent that organized labour has not prioritized attendance at the NCCC. The reasons for this are not clear and could range from lack of human resource capacity to the perception that climate change issues are not of immediate importance to their members.

There has been regular participation from provincial government but not from all provinces. The attendance of the provinces is typically restricted to a small sub-set of the nine provinces. Local government is not represented at the NCCC except in unusual circumstances, such as when a municipal representative is called upon to provide a report to the committee on a current topic. Only very recently has a more formal invitation to local government to sit on the NCCC been extended and hence their attendance at the forum has not been included in the figure above.

At points the NCCC has established working groups on various topics (such as technology transfer). These groups appear to have had limited success and lifespan and in general it appears that the committee has encountered barriers in developing long term work programmes on specific topics.

**Scope of work**

The nature of the items debated at the NCCC is also relatively flexible – although constrained by its need to primarily provide advice to the DEAT. Issues discussed range from the UNFCCC negotiations and the composition of the South African delegation to awareness-raising around climate change in the country.

Much of the discussion of the committee is structured around the UNFCCC processes, including the various subsidiary bodies and the structures and negotiations of the Kyoto Protocol. The UNFCCC discussions by the committee partly deal with national positions to be taken to the various UNFCCC negotiating fora, but the committee also serves as a forum for other UNFCCC items such as report-backs and discussions on the composition of delegations.

In some ways these UNFCCC discussions act as semi-formal deliberations on national policy on climate change but are typically not directed specifically at national policy positions or national strategy towards the implementation of climate change policy.
The CDM has featured extensively in the NCCC discussions. Much of this debate was around the establishment of the required regulatory structures and processes for the CDM in South Africa. The NCCC has also clearly assisted in the development of the National Communications and Climate Change Response Strategy and has paid some attention to broader climate change awareness-raising. The NCCC also serves as a general information clearinghouse around climate change events and policy issues.

The figure below categorises the various topics addressed by the NCCC and provides an indication of the relative frequency with which each of these was discussed.

![Scope of Work](image)

**Figure 3. Scope of discussions of the NCCC**

From the figure it can be seen that the NCCC has failed to undertake substantive specific discussions on national energy policy and national vulnerability and adaptation policies. Both these topics have been discussed by the NCCC in the context of the National Communication and associated research and in the development of the National Climate Change Response Strategy but they have not received significant direct and specific attention by the NCCC.

The reason for the relative absence of these crucial topics is probably due to the restricted mandate of the NCCC. The stated scope of work of the committee is to advise the DEAT on issues related to climate change. This scope of work is relatively loosely defined and energy policy could certainly be seen as an issue related to climate change. However, the target of the NCCC’s advice is very clear and its mandate is clearly limited to advising the DEAT alone. The DEAT itself has no regulatory or planning powers with regards to energy and hence the NCCC cannot provide advice to it on these matters. Similarly, the limited direct control that the DEAT has over much planning or policy related to vulnerability and adaptation probably also explains the relatively limited attention given to direct policy advice on these areas.

There also does not appear to be any mechanism whereby the NCCC as a whole can contribute to other parallel and related policy processes such as the Energy White
Paper, the Renewable Energy Policy and similar climate relevant policies from departments other than the DEAT.

Discussion
The flexibility of the NCCC and its relatively open composition, as discussed above, has both positive and negative implications. It allows the NCCC to successfully react to changing circumstances. For example, the NCCC became an important working forum, drawing in a wider than normal range of organizations, for the hosting of the National Climate Change Conference held in November 2005.

The NCCC is also a transparent institution, with few issues of confidentiality and relatively open access by a range of interest groups. The nature of the forum encourages participation and inclusivity and allows direct engagement between key government decision-makers and external stakeholders.

It can be argued that much of the benefit of the forum is also information sharing – in some areas this function may be as important as the debate and development of policy positions at the NCCC itself.

From another perspective, the relatively loose and changing structure of the NCCC has its demerits. It works against the establishment of a clear and long term programme of action by the forum. It potentially also stifles long-term policy or strategy debates.

Like other such committees the effectiveness of participation of representatives varies according to the skills, knowledge and experience of the delegates, the time that they have available for preparation, and the resources of the institutions supporting them. In this light the nature of the NCCC potentially creates the conditions for regulatory capture by the ‘stronger’ lobby groups\(^6\). The stronger groups include organized business but are not necessarily limited to these groupings. Both the NGO and the research sectors are consistently represented at the NCCC and have fairly substantial resources available to support policy development around climate change and to act as effective lobby groups themselves.

Mitigating against the potential for regulatory capture is the relatively ‘balanced’ composition of the NCCC, where business and NGO interests are likely to provide different pressures on government. A further mitigating factor is the existence of a parallel internal government coordination and policy development forum, discussed in the following section.

3.3 Horizontal government coordination
The South African government uses a range of measures to coordinate policy and activities across state structures.

These include the following:

- The PCC, comprising the President, the Minister for Provincial and Local Government, and the nine Premiers.
- Ministerial clusters, Directors-General clusters and the Forum of South African Directors-General (FOSAD), which promote programme integration at national and provincial level.
- Ministerial forums (or MinMecs) between responsible line-function Ministers at national level and their respective counterparts at provincial government level,

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\(^6\) Regulatory capture refers to the situation where the regulated community (in this case largely the main greenhouse gas emitting sectors) begin to have an undue influence over the regulators (in this case the DEAT) due to their greater resources, information and close access to the regulator who relies too heavily on the regulated community for resources and information.
which normally meet on a quarterly basis. These fora are supported by technical committees.

- A number of intergovernmental fora that facilitate co-operative government and intergovernmental relations.

The latter intergovernmental fora include a number of specific structures which address climate change related matters. These include the inter-ministerial committee on climate change and the associated inter-departmental committee as well as the steering committee of the Designated National Authority for the CDM.

### 3.3.1 Inter-ministerial committee on climate change

In 2002 government representatives to the NCCC realized that in some respects the NCCC served as a lobbying forum for stakeholder interests and that these interests were not always formulated in the broad national interest. Government officials saw their role as representing, as far as possible, positions on climate change that were aligned with broad state policy and that were aimed at the national interest – rather than serving the interests of any single stakeholder grouping.

It was recognized that it was difficult for government officials from separate departments to generate a common position during the NCCC deliberations and that it was preferable for them to develop a common position, taking into account their various departmental perspectives, prior to the NCCC meetings. This position could then be debated at the NCCC.

In this light an inter-departmental forum on climate change was established. The first meeting was held in February 2002, where it was decided to call it the Government Committee on Climate Change (GCCC). This clearly indicated the intent for this committee to work in parallel with the NCCC. The initial meeting of the GCCC included the DEAT, DWAF, DTI and DFA.

Specific functions of the committee were:

- **Advice to the DEAT**: providing advice to the DEAT sub-directorate on Climate Change and Ozone Layer Protection on the formulation of national climate change strategy and policy

- **Climate change projects**: discussing global climate change projects, including projects under the CDM and other flexible mechanisms

- **Promotion of research**: promotion of, and in certain cases, initiation of climate change research in South Africa

- **Promotion of regional issues**: promotion of regional issues related to climate change

The GCCC meets before each NCCC meeting to discuss the government's position on issues arising at the NCCC. It does not directly advise the NCCC but participates equally in the NCCC to strengthen the Government’s position. The secretariat for the Committee is provided by DEAT.

In addition to the DEAT the GCCC is composed on one principal delegate and one alternate from each of the following government departments:

- Department of Agriculture
- Department of Science and Technology
- Department of Foreign Affairs
- Department of Health
- Department of Housing
• Department of Local and Provincial Government
• Department of Minerals and Energy
• Department of Trade and Industry
• Department of Transport

The GCCC functioned relatively successfully until late 2005. At this stage the cabinet decided to establish an Inter-Ministerial Committee on Climate Change (referred to as the IMC) and an associated Inter-Departmental Committee (the IDC). The cabinet decision followed a national conference on climate change which appears to have elevated climate change policy higher on the agenda of national government. The government stated that the intention of establishing the IMC was to “ensure the alignment, cohesion and coherence of government responses to climate change by coordinating and driving its climate change responses and interventions” (RSA, 2005).

The IDC is, in essence, a continuation of the GCCC. However, it now falls under a ministerial committee which provides the GCCC with enhanced status and access to political decision-making power. The impacts of this changed status remain to be seen. It is, however, encouraging that the climate change debate has been elevated somewhat within government. It raises the likelihood of climate change considerations entering other areas of policy and provides a more direct channel than previously existed for climate change issues to be raised at the Ministerial and Cabinet level. Indirectly, therefore, the role and impact of the NCCC, and the various stakeholder groups within it, is strengthened.

3.3.2 Designated National Authority Steering Committee

The DNA for the CDM has been established within the Department of Minerals and Energy. An inter-departmental steering committee acts in an advisory capacity to the DNA and also provides some oversight over the functions of the Authority. The administrative functions of the DNA are located within the structures of the Department of Minerals and Energy.

The diagram below shows the institutional arrangements associated with the DNA. As can be seen there is significant overlap between the DNA steering committee and the IDC (formerly the GCCC). The main difference is the inclusion of the National Treasury in the DNA committee.
3.3.3 Effective networks at the local government level

Eleven municipalities in South Africa have been involved in the ICLEI Cities for Climate Protection Programme since 2001. Funded jointly by USAID and DEAT, this programme set out to raise awareness and capacity within local governments around climate change and sustainable energy approaches. It provided seed-funding to allow participating municipalities to prepare greenhouse gas inventories for their municipal operations, to attend training courses and international conferences, and to implement demonstration projects aimed at mitigation of greenhouse gas emissions from municipal operations.

The programme has been a great success within South Africa and has had the effect of elevating climate change issues onto the agenda of the participating municipalities. Many are now in the process of approving and implementing municipal climate change strategies and are dedicating significant internal funds to mitigation projects – many, but not all, of which are being developed as CDM projects. The lasting legacy of this programme has been the creation of a network for local government's to discuss and share approaches and experiences with climate change related projects. A strong network has been created between the municipalities involved and a significant momentum is now being achieved at local government level on climate change policy development and action.

3.4 Vertical government coordination

The government of South Africa works in three ‘spheres’: national, provincial and local government. While each sphere of government has particular roles and areas of responsibility, there are many functions for which two or three of the spheres share responsibility. Thus, one of the greatest challenges faced within government in South Africa is to deliver functions for which there is a need for what is termed ‘co-operative governance’ across its different spheres - the ‘environment’ is one such area.

Within South Africa’s Constitution, responsibility for the environment is defined as an area of ‘concurrent national and provincial legislative competence’. This allocates the main responsibility for its management and protection to the national and provincial spheres. However, air pollution is also specifically singled out as an area of responsibility for local government. With regard to planning, reporting and management of greenhouse gases, there is thus a great need for effective cooperative governance and coordination.

3.4.1 Coordination of policy development

There are no specific mechanisms in place to coordinate climate policy development between spheres of government, other than the NCCC which has been discussed in detail above. The NCCC, however, does contain limited representation by local or provincial government and is thus limited in the way through which these spheres of government can receive information and guidance on climate policy direction.

This is an area of weakness at present and will need to be addressed if the NCCC is to undertake this vertical coordination role. Local governments have not yet been provided with policy direction specific to their sphere of government on climate change or sustainable energy strategies (which would be the responsibility of DME) and within those municipalities interested in this issue, this is an area of great need. Thus, the drive to develop policy at the local level is largely coming from within the local
governments and their own networks and requires additional support and guidance by national departments. The lack of formal channels for discussion and communication on climate change issues also means that important lessons being learned at the local level in South Africa around the implementation of climate change policies and actions, are not always finding their way upwards to the higher levels of government, where they could be used to inform provincial or national policies on the subject.

3.4.2 Environmental coordination and reporting

Despite the lack of vertical coordination around policy development, South Africa does have some strongly entrenched systems for environmental planning and reporting, which are beginning to be used to achieve more coordination within important planning and reporting documents.

General coordination of environmental planning by government in South Africa is carried out through a structure known as the Committee for Environmental Coordination (CEC). This structure was established by South Africa’s framework environmental legislation (the National Environmental Management Act (NEMA) 1998). One of the primary objectives of the CEC is to make recommendations regarding the harmonization of environmental functions of all relevant national departments and spheres of government.\(^7\)

It does this through the scrutiny of what are termed Environmental Implementation and Management Plans (or EIMPs) which are submitted to the CEC by every national department with responsibility for management of the environment, or whose policies may have an impact on the environment. All provinces are also required to submit an EIMP to the CEC for scrutiny. EIMPs are prepared every 4 years and progress on their implementation must be reported to the CEC on an annual basis.

At present, there is no requirement for provinces or national departments to specifically note any climate change related activities within their EIMPs. However, DEAT would like to see future reference to the plans and activities of provinces and national departments for mitigation and adaptation to climate change within all EIMPs that are submitted to the CEC. Similarly, it is also intended that this general environmental reporting procedure should be used as a method for provinces and national departments to report on progress made on climate change related goals and objectives. This will eliminate the need for a separate climate change reporting process, which it is hoped, will reduce the administrative burden on provinces and local governments for such tasks. As such, DEAT is in the process of publishing a set of guidelines for planning and reporting of climate change activity through the general EIMP/CEC processes.

The situation is similar for local government. It is a legislated requirement for each local municipality in South Africa to produce an Air Quality Management Plan (AQMP) under the terms of the recently promulgated Air Quality Act. This legislation has not yet been fully implemented and very few AQMPs have been prepared to date. However, in the future, it is likely that these plans will include sections on monitoring of greenhouse gases and planning for mitigation and adaptation responses.

AQMPs will then be further institutionalised through their inclusion in the mandatory Integrated Development Plan (IDP) which must be produced by every municipality and submitted to provincial governments for scrutiny. The EIMP reports submitted by

\(^7\) See BASIC Paper 12 by Warburton et al (2007) which provides more detail on the existing environmental law framework in the country and the mechanisms that exist within this body of law that are or could be used to give effect to climate change response measures. The paper looks in some detail at the new Air Quality Act, which also falls under NEMA, and the inherent powers in this new Act that the Minister of Environmental Affairs and Tourism has with regards to greenhouse gas emission reporting and mitigation measures.
provinces to the national CEC each year will be expected to reflect on progress made within local municipalities on the implementation of their AQMPs.

The figure below depicts the inter-governmental relationships described above. From the diagram one can see that there is clear chain of information and oversight from local to provincial government via the Integrated Development Plan (IDP) process. Provinces approve the IDPs prepared by local government and monitor the implementation of the plan. However, they can only support municipalities in the implementation of these plans and cannot hold municipalities accountable to them.

The new Air Quality Act requires the inclusion of specific Air Quality Management Plans within the IDP which hence become subject to the same process of oversight and support. This intergovernmental cooperation continues upwards to national government via both the IDPs and the Environmental Implementation and Management Plans (EIP/EMPs) of the provinces. These provincial plans will also be required to contain information on progress against the Air Quality Management Plans (AQMP) prepared at the local level.

The IDP guidelines of government have a clear focus on sustainable development and sustainable environmental and natural resource management. The Air Quality Act also provides for the management of greenhouse gases. The development planning system, combined with the air quality legislation, thus contains within it the mechanisms and systems for the vertical integration of both climate mitigation and climate response measures through the three spheres of government. With these mechanisms and systems in place, there is therefore only a small step to be made to achieve integration of climate change related activities into broader planning and reporting documents. In theory these mechanisms and systems should also make it possible for adaptation measures to be ‘piggy-backed’ (or mainstreamed) onto broader sustainable development measures. Sustainable development has been effectively entrenched into planning processes at all levels of government and is coordinated and reported on via the same IDP and CEC processes outlined above.
The NCCC and the GCCC could be an effective structure to strategise and formalise the integration of climate change response policy into the general development planning mechanisms in the country. The NCCC itself provides a forum for direct involvement of local government representative and knowledge sharing structures. The South African Local Government Association (SALGA) is a statutory body established to represent the interests of all local authorities and would be the natural body to be formally represented on the NCCC. The South African Cities Network is a voluntary association of the country’s nine largest cities and would be a further useful route to allow for improved local government engagement with the NCCC.

The GCCC could also sensibly make use of the extant planning channels through which its constituent members already engage with other spheres of government. These channels would provide the simplest and most effective mechanism of integrating climate change response measures into the development plans of provincial and local government.

This differs somewhat from the situation in the UK where according to Turnpenny, et al. (2005), “the UK has no clear machinery of implementation for climate change policy at the sub national level. Local government has no specific powers and obligations for the reduction of greenhouse gases except for a general duty. Regional government, while professing sustainability, actively work more as inward investment and development agencies.” However, although the machinery may be in place in theory in South Africa, achievement of the integration and coordination across spheres of government is still in its infancy and faces several practical difficulties:

- Firstly, environmental planning and reporting through the general cooperative governance structures and processes mentioned above, is not working effectively at present. National Departments and Provinces are producing EIMPs and do report on these annually. However, they are cumbersome documents and the CEC has to date been largely ineffective in achieving true harmonization and reduction of duplication of effort across the spheres of government. This mechanism thus needs to be streamlined and improved.

- Secondly, and probably more importantly, the IDP system is overseen by development planning departments at provincial and national level. These departments have little awareness of climate change related matters and thus may not give this issue the emphasis it requires when guiding and reviewing IDP processes being carried out at the local government level. The National department for Provincial and Local Government (DPLG), responsible for the IDP planning process nationally, does not sit on the NCCC and is therefore not part of the climate change policy network at national level. Thus it is unlikely that climate change is being given sufficient profile within local government planning processes, unless it is being driven internally by the municipalities themselves. The discussion above suggests that the DPLG should be represented on the NCCC and GCCC.

- Thirdly, the delegation of responsibilities of air quality management (which under the Air Quality Act (AQA), includes GHG emissions) has not yet been completed in South Africa. Thus, the various roles to be played by the three spheres of government in this area are new and have not been implemented in practice in many cases. How effectively they will be implemented and what the need will be for new or more effective coordination structures, is therefore still uncertain at this stage. BASIC Paper 12 (Warburton et al, 2007) explains in some detail the scope for climate change response measures with the new AQA.
All spheres of government in South Africa have been committed to the implementation and constant improvement of the IDP process and see it as the cornerstone of achieving action at the local government level across all sectors where local government has a clear responsibility. Local governments also take their responsibilities for preparation of their IDPs seriously and so the future use of the IDP as the machinery through which air quality measures will be planned and implemented (and the requirement for this within the Air Quality Management Act), is an approach which is likely to succeed.

3.4.3 Disaster Management Systems

South Africa has recently established a national system and structure for planning for and dealing with disasters. This system was set up through a dedicated Act of Parliament (the Disaster Management Act of 2002) and is overseen by a National Disaster Management Centre. Under this system, each sphere of government has specific responsibilities to carry out planning for disasters and each also has specific areas for which it is responsible for response to disasters. The National Centre is responsible for coordinating these planning and response responsibilities – both across national departments, and between national, provincial and local spheres of government.

Some disaster management activity which is related to the potential impacts of climate change is currently taking place (e.g. around droughts and flooding) but this is more in response to the impacts of current climate variability than to the likely long term impacts of climate change. However, there is great potential for the disaster management framework within South African government to play a leading role in coordinating activity around adaptation both horizontally within national government, and vertically between the three spheres of government. However, it is not thought that the national disaster management centre has started to plan its role in dealing with the potential impacts of climate change at this time.

Box 1: Case study on coordination around vulnerability and adaptation

An examination of the activity currently taking place in South Africa on vulnerability and adaptation (V&A) illustrates the extent of the policy network currently in place and helps to identify how activities are coordinated and organized.

National Government:

Broadly speaking, coordination of activity in this area falls within the remit of the NCCC. However, as was stated above, the NCCC has not spent a great deal of its time discussing V&A issues although when it has, DEAT has found its input of great value.

The National Climate Change Response Strategy deals only broadly with V&A and outlines that each national department should draft its own response strategy for V&A. No guidelines have been produced for national departments on how they should structure their approach to either mitigation or V&A, and as a result current activity is somewhat uncoordinated and levels of activity are not consistent across departments. Most activity, is unsurprisingly, taking place within government departments currently faced with vulnerability related to existing climate variability (e.g. agriculture and health). The National Department of Agriculture is most active, having recently hosted a conference dedicated to V&A; other departments, such as Health and the Department of Housing have limited their activities to less detailed analysis of what climate change might mean for them.

DEAT is aware of the lack of coordinated response to V&A at the national level and is in the process of preparing guidance for all spheres of government. These guidelines will cover areas not included in the Response Strategy and will contain recommendations that all V&A activity is planned and reported via the EIMP and CEC processes discussed above.

Provincial Government

As with national departments, activity at the provincial level is also inconsistent. Few provinces
have started to grapple with what climate change may mean to their interests, although some, such as the Western Cape, have initiated studies on V&A and held stakeholder seminars to gather information on public perceptions and opinions on the issue. Again, the DEAT guidelines mentioned above will help to provide provinces with some information as to how to best go about planning for V&A and reporting on activities.

**Local Government**

There is still very little activity being stimulated by local governments around V&A. Most local government activity, such as that under the ICLEI Cities for Climate Protection Programme, is focused on mitigation, although some municipalities, such as the City of Johannesburg, are implementing some adaptation projects. A few, such as the City of Cape Town and eThekwini (Durban) have carried out more in depth studies into the potential future impacts of climate change on their cities and possible response measures.

**Research Community**

There is significant activity being carried out by the research community into V&A. Scientists at the University of Cape Town are developing scenarios for both mitigation and V&A and these will be used to inform future choices for infrastructure and investment; the Water Research Commission has commissioned a study on climate change and V&A; a range of other studies are taking place into natural disasters, fires, agriculture and so on. At present there is little coordination of the research carried out in this area or any formal link between the information needs of policy makers and the work being carried out by research institutions. However, the Department of Science and Technology (via the National Research Foundation) is currently preparing a climate change research strategy, with which DEAT has been very involved. This strategy will provide a channel through which state funding for research can be distributed.

**Private Sector**

The private sector, most noticeably in the agricultural sector, is just starting to become involved in V&A research and planning. However, activity is growing as the long term impacts of climate change begin to affects commercial interest and the need to plan an adaptation strategy becomes a financial imperative. High profile examples at present include wine and rooibos tea farmers in the Western Cape, an area which is likely to suffer from significant changes in rainfall patterns as a result of climate change in the future.

### 3.5 An emerging policy network

The above discussion has largely focused on the formal mechanisms established by government for climate change coordination and integrations. These mechanisms are a central component of the country’s response to the climate challenge but are by no means the only response. A range of stakeholders outside of government play crucial roles in addressing climate change issues – with respect to both climate mitigation and adaptation to future vulnerability.

These stakeholders do not work in a coordinated fashion, often they work at cross-purposes or even in opposition to each other. However, they do occupy the same policy space, interact with each other, share ideas and compete for influence over government and over other levers of power. They generally also share a relatively common understanding of the climate change problem but will often propose differing solutions and responses.

The combination of the formal state structures, established government policy, and informal stakeholder interactions around climate change have created a policy network around this issue in which much of the information flows and debates around climate change policy occurs. An understanding of this network is important in understanding what climate policy responses are likely to emerge successfully in the country and in understanding the various power relations that will determine future action in the country.

A full description of the SA climate policy network is beyond the scope of this paper. However, as an extension to the discussion on the NCCC an initial attempt at mapping
the network has been undertaken. This mapping aims to describe the key players in the network and to explain at least some of the major relationships between them.

3.5.1 Mapping of the network

The easiest way to depict the policy network is through a schematic ‘map’. The map below reflects the key actors in the network and also their relationships. The actors are clustered into similar groupings within the network and the arrows between them depict different types of relationships that they have with one another. Key components of the network are also established policy documents, such as the Climate Change Response Strategy, as well as established fora, such as the NCCC.

It is also important to note what is missing from the network. As an example, the Presidency is shown in grey as a potentially important actor that is not within the policy network.
Figure 6. Vertical coordination of the Air Quality Act
The policy network map shown above is complicated, despite the fact that it represents only the more significant actors in the South African policy network. Nevertheless, it does highlight some important elements of the network. For example, it is clear from the map that government, and national government in particular, sits at the heart of the network. Most other actors interact with, or via government. This demonstrates the crucial role of adequate capacity at certain points within government and also demonstrates those points were policy interventions or support are most likely to be useful.

It can be seen that few actors interact with each other outside of government structures – for example, some advocacy or lobbying may occur between NGOs and organized business, and some resources may be shared within the private sector, but most policy interaction is mediated by government. National government also plays a large role in facilitating that interaction which occurs between the provinces. At the same time there is an emerging “sub network” of local government in which municipalities are sharing information and expertise between themselves within going through national government as an intermediary.

It can be seen that the new Air Quality Act requires all three tiers of government to oversee and implement it and therefore presents an obvious mechanism for formal integration of greenhouse gas management measures across the tiers of government. The renewable energy policy of the DME does not provide a similar cross government policy platform.

The network also shows the importance of small number of well resourced and influential academic or research organizations. These organizations have important roles to play in keeping the network informed, in ensuring that the network is fed with new policy insights and options, and in providing “impartial” support.

The importance of the NCCC and the DNA can be seen. These coordinating institutions are able to embrace wide sections of the climate policy network and act as one of the few formal means of allowing actors in the network to engage in a structured and constructive manner.

Finally, it is important to note who is missing from the network. Particularly important, given the noted influence of government within the network, are the two key coordinating structures of government, the Presidency and the National Treasury. In addition to occupying positions of cross-sector coordination these are also, arguably the two most influential components of national government. Their absence demonstrates that climate change remains peripheral to the core concerns of government which are economic growth and employment, poverty reduction, delivery of basic services and welfare and social challenges – such as HIV/AIDS.

A simple schematic of the likely power/interest of national departments with regards to climate change is shown below.

<table>
<thead>
<tr>
<th>POWER</th>
<th>Low</th>
<th>INTEREST</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>National Treasury</td>
<td>Minerals &amp; Energy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Presidency</td>
<td>Trade &amp; Industry</td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>Health</td>
<td>Environmental Affairs &amp; Tourism</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Provinical &amp; Local Government</td>
<td>Water Affairs &amp; Forestry</td>
<td></td>
</tr>
</tbody>
</table>

Figure 7. Power/Interest matrix of national departments
The matrix shows that those of those departments with high interest, some such as the DEAT and DWAF, have relatively low political power. Those with higher power, however, have more complicated relationships to the climate issue. For both the DME and the DTI some of the natural policy objectives conflict with a strong and pro-active climate stance. For example, the continuance of low electricity prices is an important strategic issue for both these departments, as is the continued economic success of the domestic coal industry.

**Definition of the national interest – Case study "Carbon Tax"**

The fact that there are competing interests within government over some of the key issues related to climate change is often not recognized within discussions on climate policy. There remain real conflicts between, and sometimes within, departments over what actions with regards to climate change promote the national interest. The hypothetical policy question of a carbon tax is used in the diagram below to illustrate this issue. The reason why this example is chosen is that it has been raised, for discussion purposes, by the National Treasury in background documents for the Environmental Fiscal Reform policy of the National Treasury.

Under the scenario of the South African government evaluating a new carbon tax one can see that the various key state actors would have mixed interests. The National Treasury’s short term response may be positive based on the perceived revenue flows to the fiscus and potential double dividend of tax reductions on other areas of the economy. Arguably, they would have fewer incentives to study the eventual implications of such a tax on national greenhouse gas emissions. The DTI may be likely to see such a tax as a potential threat to industrial competitiveness due to impacts on power prices and would have a negative response. The DEAT may have internal conflicts, on the one hand supporting the local and global environmental implications of the tax but on the other hand understanding the importance of South Africa’s future position in the UNFCCC negotiations and possibly wanting the introduction of any such instruments to be more directly tied into and timed with global negotiations of a future climate regime. In this light they may support the tax but may want to defer implementation to allow more time to assess its implications across various local, national and international dimensions.
Should South Africa impose a carbon tax?

**Problem**

Institutional Conflict
(Q: should SA impose a carbon tax?)

**Causes**

- Insufficient information
- Insufficient expertise
- Inadequate cross-departmental negotiation

**Response**

- Basic research (elasticity of demand for electricity, technology options)
- Modeling support (energy/economic modeling)
- Understanding of future international climate policy
- Re-design of the Government Committee on Climate Change
- Capacity building

**YES**

National Treasury
(revenue objectives, little understanding)

**NO**

Trade and Industry
(competitiveness, cheap electricity)

**Minerals and Energy**
(RE policy, cheap electricity)

**MAYBE**

Environmental Affairs and Tourism
(future negotiations, local enviro quality)

Figure 8. Policy conflicts over (hypothetical) climate change measures

Further adding to the potential conflicts over what is in the national interest is the fact that for many policy choices, such as that of a carbon tax, there is insufficient information and policy expertise within government departments to rapidly understand their implications. Although inter-departmental fora do exist, such as the inter-departmental committee on climate change and cabinet clusters, these are sometimes not used to debate emerging policy questions across departments.

Some possible responses suggest themselves to this type of dilemma. These include improvements in basic research and information. Additional primary research is needed on many climate related matters – in the case above this would be research on demand responses to energy price changes and costs of less carbon intensive power generation technologies. Further, extra-government support is available, and should be used in areas where the state may lack capacity, such as energy/economy modeling.

Those departments outside of the NCCC should have further exposure to and training in international climate policy and the implications for local measures that affect emissions. The hypothetical example also points to the possible need to redesign the government committee on climate change to more directly include policy makers from outside the normal sphere of climate decisions. The recent establishment of the inter-ministerial committee on climate change (IMC) and the emergence of the inter-departmental committee on climate change (to replace the GCCC) may already be a move in this direction as it is likely that the IMC will have greater capacity for true cross departmental or cross sector discussion and negotiation.

4 Conclusion

Many of the strengths and challenges of the South African approaches to the coordination of climate change policy have been discussed within the text. Some of
these will be applicable to other countries while some will be specific to South Africa. A broad summary of some of the lessons is provided below.

4.1.1 Strengths of SA policy networks

One of the major strengths of the NCCC in particular, and the climate policy network as a whole, is its evident accommodation of a broad range of stakeholder interests. This partly stems from the generally inclusive approach of the South African government, which has attempted to redress the closed and exclusive approach of the apartheid state. The NCCC is an open forum with few barriers to entry. Similarly, the South African UNFCCC delegations strive for the inclusion of a range of interests.

The NCCC is also, on the whole, a highly transparent forum, as are other elements of climate policy making. The meetings are open and include efforts to report back on government attendance at the UNFCCC and other international discussions. Many components of state policy are openly debated at these meetings.

The NCCC, and associated institutions within the network allow for relatively good access by stakeholders to key decision makers. Stakeholder organizations have many opportunities to state their case, to present information to government and to lobby for their positions. The NCCC also assists in equalizing the influence of stakeholders with lower resourced groupings having as equal access to the forum as more powerful interest groups.

The current policy network, both the formal NCCC and informal elements, have served to foster good links between research institutions and policy makers. This has provided support to government when internal capacity has been lacking and has helped to keep a core of climate research viable and relevant.

Government has also recognized the need for parallel internal and external policy processes. The establishment of the GCCC (superseded by the IDC) has been a major advance in inter-departmental coordination of climate policy. Although there is some overlap between the GCCC and the NCCC they serve different purposes: the GCCC acting as a means of policy coordination and a mechanism to balance national interests across departments, and the NCCC acting largely as a forum for information sharing, consultation and external policy debate. The ability of the DEAT to present and debate a coherent government position in the NCCC allows for productive debate within the forum.

4.1.2 Challenges for SA policy networks

Despite the emergence of a climate policy network, with the NCCC at its centre, there remain a number of challenges to the coordination of climate policy and action. The first challenge is the integration or mainstreaming of climate policy into the highest levels of economic planning, including the Accelerated and Shared Growth Initiative of government as well as emerging industrial and energy policy. This will only occur with participation by the National Treasury and the Presidency in structures or processes addressing climate change policy. This view is supported by organized business who continue to advocate the need for greater coherence in government climate policy both in its development and implementation. BUSA state that they “remain concerned that the implementation of the National Climate Change Response Strategy still does not form an integral component of other appropriate national policies and strategies and urges Government to address co-ordination in this regard.” (Business Unity South Africa, 2005).

A related limitation with the current NCCC arrangement is that the committee primarily advises the DEAT. However, the DEAT itself has limited influence over energy or industrial policy or over key levers of spatial and infrastructure planning. There are arguments for the NCCC’s mandate to be extended to providing advice to the Inter-
In particular, the NCCC appears to have limited impact on direct energy planning. Mechanisms should be sought to enhance the links between the climate policy and the energy policy networks to allow for greater influence of climate considerations in the country’s energy planning and policy.

The existence of a well developed mechanism for vertical integration of development and environmental planning between the national, provincial and local spheres of government, suggest that these mechanisms could be better utilized to encourage the flow of information between the spheres of government. The role of the Department of Provincial and Local Government in this system, as well as the department’s oversight role of the in disaster management, suggest the need for greater involvement of the DPLG in climate matters and the strengthening of their awareness and capacity in this regard. Specific representation of the DPLG on the NCCC and IDC appears to be warranted given the important role of Provincial and Local Government in responding to climate change.

Linked to the above is the need for a strengthening of internal resources within the DEAT. The management of complex domestic and international climate change policy processes, intergovernmental coordination and continual stakeholder consultation and engagement requires significant human resource capacity. The DEAT at present does not have enough resources to allow staff members to adequately address themselves to these tasks. Although other actors in the policy network do support these processes sufficient core capacity is still required within national government.

Although the NCCC allows for an open and equal platform for stakeholders, it is a reality of stakeholder politics that more dominant business sectors with vested interests have greater political power than other stakeholders within the climate policy network. These entities have a range of methods of influencing the state at various levels and have far greater resources than the other non-government stakeholders within the NCCC. The current NCCC arrangements certainly create the conditions for regulatory capture – although these are mitigated by access to the committee by counter-balancing forces and by a strengthening interdepartmental network. This is not meant to imply that these more influential organizations play a negative role in the NCCC, in many cases they offer important resources and insights to the forum as well as progressive approaches to addressing climate change concerns. However, the imbalance of power in the climate change policy debate in South Africa cannot be ignored when attempting to understand the dynamics of climate policy development and likely outcomes.

The research capacity that exists remains limited and concentrated in a small number of institutions. Given the importance of such capacity to the policy network this research network should be expanded and strengthened. Recent work undertaken by the Department of Science and Technology is providing support to this and also to improving the relationship between national research needs around climate change.

A final limitation of the NCCC and the climate network more broadly is that it is largely a policy network and there is limited evidence of implementation efforts being initiated or integrated across departments or actors within the network. Effort should be taken to move towards the next step of integrating actions on climate mitigation and adaptation across departments and of integrating development programmes and climate change responses. Clear potential exists in areas such as low income housing policy where improved insulation, building orientation and use of solar water heating can have benefits for the quality of life of householders, value of housing stock and can reduce greenhouse gas emissions. There are similar options available within public transport and other areas of infrastructure delivery.
Such integrated programmes are most likely to succeed if they have support from more than one national department as well as support at lower spheres of government. Buy-in from the private sector and national utilities will further enhance their chance of success. The existence of a climate policy network is an important first step in creating the policy space for such programmes. The move from a policy network to an implementation network will herald the real integration of climate change and sustainable development considerations into government practice.
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