



A project of Earthlife Africa Jhb



groundWork

Environmental justice action

P.O. Box 2375, Pietermaritzburg, 3200, South Africa ● 6 Raven Street, Pietermaritzburg, 3201, South Africa
Tel: +27-33-342 5662 ● Fax: +27-33-342 5665 ● learn@groundwork.org.za ● www.groundwork.org.za

Date: 06th August 2014

To: Mr Jingikhaya Witi

Director: Climate Change Monitoring and Evaluation
Branch: Climate Change and Air Quality Management
Email: jwiti@environment.gov.za
Tel: 012 310 3083
Post: Fedsure Forum
Corner Lilian Ngoyi and Pretorius Streets
Pretoria
0002

Re: Earthlife Africa Johannesburg and groundWork comment on the National Greenhouse Gas Inventory from 2000-2010

Dear Mr Witi,

Please accept the comments submitted from Earthlife Africa Johannesburg (ELA) and groundWork to the National Greenhouse Gas Inventory from 2000-2010.

Some of the main points made by ELA and groundWork in the submission are summarized below:

1. The submission of ELA and groundWork focuses on how the inventory can be improved in the future, so that it can become a useful tool for all parties concerned with climate change mitigation in South Africa. A fundamental question that ELA and groundWork asks is: what mechanisms are being put in place to ensure more regular and accurate reporting on GHG emissions from industry and how will the Department be able to enforce these regulations? More importantly, this Inventory does not hang as an isolated tool within environmental

regulation in South Africa, but is a fundamental building block towards building a climate change mitigation programme. This relationship must be rigorously explained.

2. Secondly, this Inventory suggests much higher GHG emissions than previously estimated and stated. The implications of these higher estimations for South Africa's international climate change mitigation targets and domestic GHG budgets must be analysed. In the short-term future, South Africa's GHG emissions will increase substantially as Kusile and Medupi coal-fired power stations are expected to come online. How will this feature impact on South Africa's ambitions to peak emissions by 2025 (National Climate Change Response Strategy). Of further concern is that the Inventory makes use of a warming affected for Methane which has been taken from the IPCC Third Assessment. Methane is calculated to have a much larger greenhouse effect in the Fifth Assessment.
3. Lastly, there has been an inadequate public participation process on the development and release of the GHG Inventory. This Inventory forms an essential tool for climate change mitigation in South Africa and therefore civil society, who represent those who are most vulnerable to climate change, should have been more informed of the process.
4. We look forward to being more involved with the next step in the process.

Contacts:

Dominique Doyle
Energy Policy Officer
Earthlife Africa Jhb
Sustainable Energy & Climate Change Project
5th Floor 521 Hereneegracht Building
87 Dekorte Street, Braamfontein, 2017
P O Box 32131, Braamfontein, 2017
Tel: +27 11 339 3662
Cell: +27 79 3312028
Email: dominique@earthlife.org.za
Website: www.earthlife.org.za

S. (Bobby) Peek
Director
groundWork, Friends of the Earth, South Africa
P.O. Box 2375
Pietermaritzburg, 3200
Tel: +27 (0) 33 342 5662
Cell: +27 (0) 82 464 1383
Email: bobby@groundwork.org.za
Website: www.groundwork.org.za

