

To: The Director General: Department of Environmental Affairs
Attention: Ms Dineo Ngobeni
Department of Environmental Affairs
Environment House, 473 Steve Biko Street
Arcadia, Pretoria, 0001

By e-mail to: climate@environment.gov.za

7 August 2018

COMMENTS ON THE DRAFT CLIMATE CHANGE BILL, 2018

Dear Ms Ngobeni,

Thank you for inviting public comments on the draft Climate Change Bill published in the Government Gazette on 8 June 2018.

After carefully considering the draft Bill, we would like to submit a number of comments which, we hope, will contribute towards a robust, ambitious and fair legislation on climate change for South Africa.

Our comments are enclosed in the document hereafter. The layout follows the structure of the draft Climate Change Bill. We distinguish between *general comments* on what is required to achieve a good climate change law for the country, and *specific comments* which are referenced against the various sections of the draft Bill.

Yours sincerely,

Thabo Raliwedzha
[Chairperson]
[Lephalale community justice movement]

COMMENTS ON THE DRAFT CLIMATE CHANGE BILL

**As published in the Government Gazette on 8 June 2018
by the Department of Environmental Affairs**

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General comments and proposed amendments

1. [Lephalale community justice movement] welcomes the draft Climate Change Bill. Legislation on climate change is urgently needed for South Africa to domesticate its international obligations under the Paris Agreement ratified in 2016. This is **a critical and urgent step to provide the country with the legal basis for ambitious and immediate action to address climate change**. As such, the robustness and ambition of this legislation is essential.
2. The Act should be **written in such a way that it is understandable by all in South Africa**, especially people who are not native English speakers, and/or not familiar with the legal jargon.
3. South Africa's climate change legislation **must prescribe clear and ambitious enough goals to ensure the country's "fair contribution" to limiting the increase of global temperatures to 1.5°C above pre-industrial levels**. A 2°C global temperature increase would translate to a 4°C increase for South Africa¹, thus we must aim for a stringent objective that reflects the need to achieve zero greenhouse gas emissions as soon as possible². This required if we are to uphold **Sections 24 and 27 of the Constitution**.

Legislation on an issue as urgent and all-encompassing as climate change should be **constraining from the outset**, rather than leave the level of ambition to be negotiated at a later stage as proposed in the draft Bill.

Therefore it is paramount that the future Climate Change Act **explicitly references the 1.5°C limit as South Africa's mitigation target**, to ensure that the country takes ambitious and unconditional action to contribute fairly and effectively to this goal, and that it **revises its existing nationally determined contribution accordingly**, as provided by Article 11 of the Paris Agreement.

[LCJM considers that South Africa's Nationally Determined Contribution as submitted in 2015, and particularly the peak, plateau and decline greenhouse gas emissions trajectory it is based on, is grossly insufficient and inconsistent with our commitment to contribute to the global target set in the Paris Agreement. Therefore it cannot be used as a benchmark for South Africa's response. On the contrary, **the legislation must set clear targets against which the greenhouse gas emissions trajectory will be determined**. These specific, time-bound targets may be expressed in absolute or relative values, and should include interim targets so that we can assess South Africa's progress and adapt appropriately to meet our long-term targets.

4. The Act should **enshrine our commitment as a country to shifting rapidly to renewable energy sources**, in a way that benefits all the people from South Africa and contributes to lowering our impact on the environment and the climate. This is essential to guide the country's energy policy, knowing that the energy sector (and the related mining sector) are currently the biggest contributors of greenhouse gas emissions. The legislation should contain a commitment to achieving access to renewable energy for all in South Africa, and prohibit the extension of fossil fuel power stations operations beyond their initial lifespan.
5. **The timeframes for reviewing our mitigation targets and implementation measures are disproportionate to the urgency of the climate crisis** and the fast-pace at which the options to mitigate (and adapt) are evolving. Time is running short between today and when a tipping point might be reached beyond which a stable, hospitable climate is attainable, leading to catastrophic,

¹ South Africa's Nationally Determined Contribution (NDC), p.1.

² The NDC confirms that "*near zero emissions are required in the second half of the century to avoid even greater impacts that are beyond adaptation capability.*" (p.1).

irreversible climate impacts. The faster climate change mitigation and adaptation measures are implemented, the more effective and less costly they will be³.

Advances in scientific understanding and technological innovation in fields relevant to climate change are happening at an exceedingly brisk pace⁴. In particular, the capabilities and costs of low-emissions technologies are rapidly changing. Section 12 of the draft Bill proposes that Sectoral Emission Targets should be determined by considering "the cost and benefits; be based on the best available science; and the best available mitigation options." If the current pace of technological advance continues or accelerates, then what constitutes the "best available science", "best available mitigation options" and "the costs and benefits" will likely be very different from one year to the next.

The draft Bill provides for five years review periods, which means that targets and plans would be locked into potentially outdated information and options. Therefore, the Climate Change Act should require that **plans and policies are reviewed and, if needed, updated on a much shorter timeframe of every two years**. This should also apply to the mitigation components of the climate change response as well as data collection for M&E purposes (including the greenhouse gas emissions inventory).

6. The Climate Change Act must **compel all companies and government bodies to report on a yearly basis, publicly disclose and facilitate access to full, accurate and disaggregated information** about their greenhouse gas emissions, as well as the social, environmental and economic impacts of their activities.
7. Lephale community justice movement recommends that the legislation **regulates conflicts of interest of public officials** in functional areas concerned by climate action. This is needed to prevent private or other interest from influencing decisions in such a way that they may delay or reduce the effectiveness of the interventions required to reduce greenhouse gas emissions, or to adapt to climate change.
8. The Act must affirm the principle of **Free, Prior and Informed Consent (FPIC)** as guiding decision-making, especially for emission-intensive activities that have direct adverse impacts – environmental, social, economic and health-related – on communities.
9. The Act must also enshrine the **'polluter pays' principle**.
10. The penalties proposed in the draft Climate Change Bill are inadequate, and will fail to disincentivize non-compliance, especially for well-resources entities. The Act must prescribe **smarter and harsher penalties** – and explore other forms of penalties that might be more effective. For instance, the temporary suspension of operating licenses, or making fines proportional to profits or financial assets.
11. In addition, LCJM disagrees with the provision (section 13 (10)) that would allow for non-compliance with greenhouse gas emissions reductions requirements defeats the objectives of the Act. Setting a deadline for complying with carbon budgets, and then allowing for an extension, renders the deadline meaningless. We know all too well how exemptions may be abused, with some companies requesting (and obtaining) exemptions on a rolling basis. Furthermore, the carbon budgets serve to contain the *volume* of greenhouse gas emission. Extending the compliance period would mean that

³ Figueres, C., Schellnhuber, H. J., Whiteman, G., Rockström, J., Hopley, A., & Rahmstorf, S. (2017). Three years to safeguard our climate. *Nature News*, 546(7660), 593. https://gspp.berkeley.edu/assets/uploads/research/pdf/Figueres-ThreeYearstoSafeguardOurPlanet-Nature-2017_full.pdf

⁴ Biello, D. (2015). Accelerated Innovation Is the Ultimate Solution to Climate Change. *Scientific American*. <https://www.scientificamerican.com/article/accelerated-innovation-is-the-ultimate-solution-to-climatechange/>. [2017-08-11].

the desired volumes of emissions is exceeded once and for all: there is no way to offset these emissions retroactively.

Therefore there must be **no possibility to extend compliance timeframes; or at the very least, strict restrictions on the granting of extensions** (e.g. that a person may request an extension only once, and that this extension may not exceed one year).

12. With regards to mitigation, the draft Bill is silent about a critical mitigation instrument, i.e. **the protection and enhancement of natural carbon sinks**. The legislation should acknowledge their importance and make it compulsory to integrate them in any mitigation and adaptation strategy.

13. The Act should prescribe increased efforts to **educate the public about climate change**, its impacts and how we can reduce our emissions (mitigation) and adapt to changing circumstances. It should also include provisions to **strengthen the capacity of government and civil society, especially affected communities, to report, monitor and enforce compliance to the legislation**, especially with regards to environmental regulations and emission reduction. In this regard, the Act should also prescribe participatory and independent monitoring and reporting, to ensure objectivity and accuracy.

14. It is concerning that the draft Bill only refers to public actors (government, State Owned Entities) and doesn't specify who are the other "stakeholders" that have a role to play. The Act should be more specific on **obligations for the private sector**, as well as **the rights and responsibilities of civil society actors and communities**, to make sure that the interests of the people are fairly and effectively represented.

It would be useful to consider provisions regarding the role that **tribal authorities** may or should play to foster effective climate action.

15. The Act should **acknowledge the specific vulnerability of women to climate change impacts**, and provide for the **mainstreaming of gender sensitivity** in South Africa's climate change response.

16. Lastly, LCJM welcomes the provisions regarding **consultation and public participation**, which confirm that climate change is a challenge that concerns everyone in South Africa. Therefore, all individuals and stakeholders have a role to play in shaping and implementing our response to climate change. However, these provisions must be more specific to effectively allow for **all** these stakeholders to be part of the decision-making process. In particular, the legislation should prescribe the conditions that **guarantee meaningful participation of all interested parties, especially individuals and communities**. It should prioritise direct participation instead of representation through intermediaries (e.g. traditional leaders or "experts"), so that the voices of citizens and of communities are heard; it should also highlight the necessity for correct, full and timely information.

In that regard, LCJM deplores that the Provincial Stakeholder Engagement Consultations held in June and July 2018 were inadequately advertised, and local communities have not had the opportunity to properly engage in the process. Civil society and the general public have been grossly underrepresented. As a result, the consultation has failed to achieve a number and diversity of stakeholders proportionate to the stakes, therefore **questioning whether the public participation was indeed meaningful**. The Department must remedy to these shortcomings in future engagements, especially on issues like climate change that concerns all citizens.

Specific comments and proposed amendments

Preamble

Draft Climate Change Bill	Comments
General	The Preamble should recognise the specific vulnerability of women to climate change, and call for mainstreaming gender sensitivity in South Africa's climate change response.

Chapter 1: Interpretation, objectives and application

Draft Climate Change Bill	Comments
2 (a)	The draft Bill provides for co-ordination/integration between government sectors, but it doesn't provide for how this links to industry/business/economic actors who are the main emitters. This should be included in this object of the Act.
2 (c) " <i>make a fair contribution to the global effort to stabilise greenhouse gas concentrations in the atmosphere at a level that avoids dangerous anthropogenic interference with the climate system within a timeframe and in a manner that enables economic, employment, social and environmental development to proceed in a sustainable manner.</i> "	<ul style="list-style-type: none"> - The Bill must make reference to the global target, rather than to the global <i>effort</i>. - This objective should specifically aim for limiting the increase of global temperatures to 1.5°C above pre-industrial levels. - The Act should provide for time-bound mitigation objectives, including targets starting from 2020. - The mitigation objectives of the Act should include a clear commitment to renewable energy and climate justice: "to achieve clean, affordable renewable energy and climate justice for all".
3. Principles	Additional principles:

	<ul style="list-style-type: none"> - “(e) principle that climate change concerns all individuals and sectors of society, thus requiring truly participatory and inclusive decision-making and climate action;” - “(f) principle of free, prior and informed consent;” - “(g) polluter pays’ principle, which may be accompanied by adequate attenuation measures consistent with South Africa’s development and social justice goals”
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Chapter 2: Policy Alignment and Institutional Arrangements

Draft Climate Change Bill	Comments
6 (4) (c) “ <i>The national environmentally sustainable development framework -- (a) may provide for the phasing in of its provisions; (b) may be amended; and (c) must be reviewed by the Minister at intervals of not more than five years.</i> ”	The review cycle should be every two years , to make sure that South Africa is on tracks with reducing its emissions and adapting to climate change, and adjusts its strategy regularly enough. A lot of damage can be done in 5 years...
6 (5) (b)	Who and how does one determine what is a substantive or non-substantive change? This provision should be removed , as it may be used to bypass the consultative process on substantive issues.
8 (1) and 8 (9)	<p>An inter-ministerial arrangement isn’t the most suited format to enable ambitious and rapid action. Climate Change is a cross-cutting issue with environmental, social and economic implications: no line department has the power to enforce commitments on others. It requires a management function (like for Planning, M&E; Disaster Management; or gender mainstreaming) entrusted to a dedicated management department or institution that can drive action and enforce commitments.</p> <p>This could be done by placing the lead on climate change response with the Presidency (and Offices of the Premiers and Mayoral Offices), or a dedicated government body.</p>

Chapter 3: Climate Change Response: Provinces and Municipalities

Draft Climate Change Bill	Comments
General	<p>Significant responsibilities are given to municipalities. The major metros may be in a position to take this on, but smaller municipalities will need resources – especially, to deal with adaptation to climate change impacts locally. The Act must include provisions that guarantee that resources, support and capacity building will be allocated accordingly.</p> <p>This comment must also be considered in relation to the provision made in sub-section 12 (10).</p>
<p>9 (1) (b) “<i>within two years of the coming into operation of this Act, develop and implement a climate change response implementation plan which must be informed by the climate change needs and response assessment as contemplated in paragraph (a) and review and publish the provincial or municipal climate change response implementation plans, as the case may be, every five years.</i>”</p>	<p>The climate change response implementation plans needs to be reviewed every two years, so that the mitigation measures keep up with technological and cost changes.</p> <p>Proposed amendment: “<i>within two years of the coming into operation of this Act, develop and implement a climate change response implementation plan which must be informed by the climate change needs and response assessment as contemplated in paragraph (a) and review and publish the provincial or municipal climate change response implementation plans, as the case may be, every two years.</i>”</p>

Chapter 4: National Adaptation to Impacts of Climate Change

Draft Climate Change Bill	Comments
<p>10 (1) “<i>The Minister may, in consultation with the sector departments, provinces and municipalities –</i></p>	<p>Needs to be compulsory and more prescriptive:</p>

<p>(a) within one year of the coming into operation of this Act, set out national adaptation objectives which will guide the Republic's adaptation to climate change impacts, the development of resilience and the Republic's contribution to a sustainable development agenda, which objectives may be periodically reviewed by the Minister; (...)"</p>	<ul style="list-style-type: none"> - "The Minister must, in consultation with the sector departments, provinces and municipalities – (...)" - which objectives must be periodically reviewed by the Minister every five years."
<p>10 (6) "The Minister may, in consultation with the sector departments and provinces, develop adaptation scenarios which anticipate the likely impacts of climate change in the Republic over the short, medium and longer term."</p>	<p>Needs to be compulsory: "The Minister must, in consultation with the sector departments and provinces, develop adaptation scenarios which anticipate the likely impacts of climate change in the Republic over the short, medium and longer term."</p>
<p>10 (11) "The Minister must collate, compile and synthesise information relevant to the achievement of the national adaptation objectives and the objectives of this Act, and thereafter publish a Synthesis Adaptation Report for consideration by Cabinet, and a Synthesis Report on Climate Change Adaptation to be used in the Republic's national and international reporting processes."</p>	<p>The Minister must compile a progress report on national adaptation objectives every year.</p>

Chapter 5: Greenhouse Gas Emissions and Removals

Draft Climate Change Bill	Comments
<p>General comments.</p>	<p>This chapter should make a provision for the protection and enhancement of natural carbon sinks, for carbon sequestration.</p>
<p>11 (1) "The Minister must, in consultation with the Ministerial Committee on Climate Change, by notice in the Gazette, determine a national greenhouse gas emissions trajectory for the Republic of South Africa, which must --"</p>	<ul style="list-style-type: none"> - The current peak-plateau-decline trajectory is inconsistent with South Africa's Paris Agreement commitment. It must be revised urgently, and the Act must prescribe a timeframe for that initial revision. - The institutional arrangement (Minister/ Ministerial Committee on Climate Change) should be amended according to the comment on Section 8 of the Act. <p>Proposed amendment: "The Minister must, within six months of the coming into operation of this Act, in consultation with the [statutory body on climate</p>

	<i>change</i> ⁵ , by notice in the Gazette, determine a national greenhouse gas emissions reduction trajectory for the Republic of South Africa, which must – (...)
11 (1) (c) <i>“be consistent with the objectives of this Act and the Republic’s international obligations.”</i>	This clause needs to make specific reference to the target of keeping the global temperature increase below 1.5°C . Cf. proposed amendment on section 2 (c). Proposed amendment: <i>“be consistent with the objectives of this Act, specifically the target set out under Section 2 (c)⁶, and the Republic’s international obligations.”</i>
12 (1) <i>“The Minister must, in consultation with the Ministerial Committee on Climate Change, by notice in the Gazette, every five years, determine SETs for greenhouse gas emitting sectors and sub-sectors, which must – (...)</i>	- The SETs should be determined within one year of coming into operation of the Act. This is in line with the urgency of the mitigation measures. - The institutional arrangement (Minister/ Ministerial Committee on Climate Change) should be amended according to the comment on Section 8 of the Act. Proposed amendment: <i>“The Minister must, , in consultation with the statutory body on climate change and by notice in the Gazette, within one year of the coming into operation of the Act, determine SETs for greenhouse gas emitting sectors and sub-sectors, which must – (...)</i>
12 (2) <i>“The Minister must review the SETs every five years from the date of initial publication, and when necessary, may amend the SETs.”</i>	The SETs should be reviewed every two years, rather than every five years. This is necessary to accommodate the urgency and scale of the shift required, as well as make the best of fast-paced innovation and costs reduction of climate-friendly technologies. Proposed amendment: <i>“The Minister must review the SETs every two years from the date of initial publication, and when necessary, may amend the SETs.”</i>
12 (9) <i>“The Minister, in consultation with the Ministers responsible for each sector and sub -sector for which SETs have been determined in accordance with subsection (1), must prescribe the minimum requirements for the content of the SERPs.”</i>	The methodology and content requirements of the SETs and SERPs shouldn’t be defined at a later stage, and at the discretion of the Ministers; the legislation must prescribe what they are in a dedicated Schedule, to ensure quality.

⁵ See proposed amendment of Section 8 (8).

⁶ See proposed amendment of Section 2 (c).

	Proposed amendment: “ <i>The methodology and minimum requirements for the content of the SERPs are listed in Schedule xx.</i> ”
13 (4) “ <i>In accordance with the greenhouse gas emissions threshold contemplated in subsection (1), the Minister must allocate a carbon budget that is applicable to a specified person for not less than three successive five year periods.</i> ”	<p>The time periods should be shorter (two years) to take advantage of technological and cost changes as they occur.</p> <p>“<i>In accordance with the greenhouse gas emissions threshold contemplated in subsection (1), the Minister must allocate a carbon budget that is applicable to a specified person for not less than eight successive two year periods.</i>”</p>
13 (5) “ <i>The Minister must review a carbon budget allocated to a person every five years.</i> ”	<ul style="list-style-type: none"> - See comment above. - The Act must provide that the successive carbon budgets allocated to a specific person may only decrease (proportionally to their volume of activity) overtime. <p>Proposed amendment: “<i>The Minister must review a carbon budget allocated to a person every two years, and ensure that successive carbon budget allocations decrease in proportion to the person’s volume of activity.</i>”</p>
13 (6) “ <i>The Minister must, by notice in the Gazette, require a person to whom a carbon budget has been allocated to prepare, submit to the Minister for approval and implement a greenhouse gas mitigation plan which describes the mitigation actions that such a person will implement to comply with the allocated carbon budget.</i> ”	<p>There needs to be a timeframe for the submission of greenhouse gas mitigation plans.</p> <p>Proposed amendment: “<i>The Minister must, by notice in the Gazette, require a person to whom a carbon budget has been allocated to:</i> (a) prepare a greenhouse gas mitigation plan which describes the mitigation actions that such a person will implement to comply with the allocated carbon budget, and submit it to the Minister for approval within six months of publication in the Gazette; (b) implement the approved greenhouse gas mitigation plan.”</p>
13 (8) “ <i>A greenhouse gas mitigation plan must comply with the requirements, process and procedures as may be prescribed by the Minister.</i> ”	<p>The Act must prescribe the requirements, process and procedures for these greenhouse gas mitigation plans.</p> <p>Proposed amendment: “<i>A greenhouse gas mitigation plan must comply with the requirements, process and procedures listed in Schedule xx.</i>”</p>

13 (10), (11) and (12)	<p>Allowing for exceptions to requirements to comply defeats the very concept of compliance, and the objectives of the Act. Setting a deadline and then allowing an extensions makes the deadline meaningless.</p> <p>The carbon budgets serve to contain the <i>volume</i> of greenhouse gas emission. Extending the compliance period would mean that the desired volumes of emissions is exceeded once and for all: there is no way to offset these emissions retroactively.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - no possibility to extend compliance timeframes. Non-compliance should only be dealt with through penalties as considered under Section 19. - or restrictions on extensions: can be granted only once to a specific entity, and for no longer than one year.
14 (3) “ <i>The Minister may prescribe a carbon budget applicable to emitters of synthetic greenhouse gases.</i> ”	<p>If there is a plan to phase down or out the use of synthetic greenhouse gases, then a carbon budget mechanisms needs to be put in place to effect this plan, and in the same way as for other greenhouse gas emissions.</p> <p>Proposed amendment: “<i>The Minister must prescribe a carbon budget applicable to emitters of synthetic greenhouse gases.</i>”</p>

Chapter 6: General Matters and Transitional Arrangements

Draft Climate Change Bill	Comments
15 (1) (c)	<p>The requirements, processes and timeframes for reporting, monitoring, evaluation and assessment of national progress on climate change must be prescribed in a Schedule of the Act, rather than through ulterior regulations.</p> <p>This includes:</p> <ul style="list-style-type: none"> - Mandatory reporting on and disclosure of disaggregated greenhouse gas emission data by all sectors and persons to whom carbon budgets have been allocated – which must be <i>facility-level</i> rather than company-level reporting, due to health and environmental implications;

	<p>- Specific M&E requirements and methodologies, including for the monitoring of annual greenhouse gas emissions by persons to whom carbon budgets have been allocated; the reporting must be transparent, independent and participatory.</p>
<p>15 (3) (b) “(a) Before publishing any regulation made in terms of this Act, or any amendment to such regulation, the Minister must follow a consultative process in accordance with sections 16 and 17. (b) Paragraph (a) need not be complied with if the regulation is amended in a non-substantive manner.”</p>	<p>Who and how does one determine what is a substantive or non-substantive change? Sub-section (b) may be used to bypass the consultative process on substantive issues, therefore it should be removed.</p>
<p>17 (1) (b) “in at least one newspaper distributed nationally or, if the exercise of the power will affect only a specific area, in at least one newspaper distributed in that area.”</p>	<p>- Experience shows that this is grossly insufficient to ensure a satisfactory level of public outreach – including because of language issues. The Act must be more prescriptive on the requirements for meaningful participation. In particular, it must require the use of multiple channels.</p> <p>Proposed amendment: “through multiple media platforms and in several national languages, including at least – (i) three newspapers distributed nationally, three radio stations broadcasting nationally, (ii) or, if the exercise of the power will affect only a province, in at least two newspapers distributed in the province, two radio stations broadcasting in the province, and in at least the three main languages spoken in that province; (iii) or, if the exercise of the power will affect only a specific area, at least one newspaper distributed locally and one radio station broadcasting locally.”</p> <p>- The Act could also make provision for local civil society actors to be enabled (resources) to help with disseminating information, educating the public and fostering broader public engagement.</p>
<p>17 (4) “The Minister or MEC must give due consideration to all representations or objections received or presented before exercising the power concerned.”</p>	<p>Public participation is meaningful only if the decision-making body provides feedback on the how the inputs received from the public have been considered when making a decision.</p> <p>Proposed amendment: “The Minister or MEC must give due consideration to all representations or objections received or presented before exercising the power concerned, and provide feedback on how these representations or objections have been considered.”</p>

19. Offenses and Penalties	<p>- A fine is only be effective as a deterrent if it is commensurate to the financial capacity of the offender. R5-10 million doesn't carry the same weight for a small business and for a large corporation– these amounts are just 'small change' for some, therefore failing to drive change.</p> <p>The Act must prescribe smarter and harsher penalties – and explore other forms of penalties that might be more effective. For instance, the temporary suspension of operating licenses, or making fines proportional to profits or financial assets. E.g.: 40% of a company's profit.</p> <p>- Revenues from the fines should be allocated to the community(ies) directly affected by the activities of the non-compliant entity.</p>
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Schedule

Draft Climate Change Bill	Comments
Functional Areas	<p>Should also be included:</p> <ul style="list-style-type: none"> - Education. This is essential to raise public awareness, but also to effect the capacity development and behavioural change needed to support the shift to a low-carbon, climate-resilient development pathway. - Social affairs. Climate change has vast social impacts, and the climate change response should consider social implications of the just transition.
	<p>Additional Schedules needed:</p> <ul style="list-style-type: none"> - Schedule: requirements and methodology for the climate change needs and response assessments that provinces and municipalities - Schedule: requirements for methodology and content of the SETs and SERPs - Schedule : requirements, processes and timeframes for monitoring, evaluation and assessment of national progress on climate change