



## Submission on the 2019/20 Annual Performance Plan (APP) and Budget of the Limpopo Department of Economic Development, Environment and Tourism

African Climate Reality Project, 30 July 2019

1. Overall the 2019/20 Annual Performance Plan is concerning and has insufficient strategic thinking and planning about climate change for a province that is already significantly impacted by the climate crisis. Furthermore, in a province that is reliant on tourism and the environment for a substantial number of jobs and economic development, ignoring the impact of the climate crisis on these sectors indicates a lack of foresight on how jobs will continue to be lost if Limpopo does not fully integrate a Low Emissions Development Strategy into its planning.

The research currently being conducted by the Department of Environment, Forestry and Fisheries on the vulnerable jobs in South Africa clearly indicates the platinum and coal sectors are at huge risk. Limpopo should include this in their planning.

The job creation and economic development potential of the restoration of carbon sinks such as grasslands and wetlands should not be ignored – especially with regards to the potential increase in income from tourism.

Climate change is only mentioned once in the whole APP. This is wholly inappropriate, considering the scale of the challenge, and the impact the climate crisis is already having on the province.

The climate change response, as per the Limpopo Climate Change Response Strategy, is not reflected at all in Programme 2: Economic Development.

There is no reference to the Green Economy Plan in the Sub-Programme: Economic Planning and Research. Rather, the focus on Mining and Mineral Beneficiation Initiative Strategy prescribes an economic development model that is carbon intensive and incompatible with natural resources preservation and sustainability.

2. In light of this, Strategic Objective 3.2.6: The target of “one (1) climate change response intervention implemented” per year is grossly insufficient.
3. In the same vein, the proposed “Energy and Metallurgical Special Economic Zone” (EMSEZ), referred to as the “Musina-Makhado Special Economic Zone (SEZ)” in the APP, is in full contradiction with South Africa’s and Limpopo’s greenhouse gas emissions reduction stated objectives. With 7 metallurgical processing plants and a 4,600 megawatt (MW) coal-fired power plant (with the sole purpose of electrifying the industrial zone), this large-scale industrial development is clearly a step in the opposite direction of sustainable, low-carbon economic development. This is being envisaged

at a time when climate science tells us that no new fossil fuel-based infrastructure should be built, if we are to have the slightest chance of keeping global warming below 1.5 °C.

The proposed EMSEZ will increase greenhouse gas emissions, which will significantly contribute to global warming and undermine South Africa's efforts and commitment to curb these emissions to fight climate change; as well as produce other forms of air pollution that will directly affect the neighbouring communities and have increased budgetary impact on the provincial health department

The other concerns in relation to the proposed EMSEZ include:

- the negative impact on water quality and water consumption (availability) in a region that already suffers from water scarcity;
- great uncertainty as to the job creation and benefits for the province/ local communities. Premier Mathabatha promised that 21,000 would be created from the SEZ, but Chinese companies are infamous for bringing their own employees, and repatriating their profits to China;
- furthermore, research conducted in South Africa clearly indicates the increase in social ills which arise alongside projects such as these (see Bench Marks Foundation for documented social ills<sup>1</sup>); the province will have to find funding to alleviate them;
- lack of community engagement and lack of transparency on the project development, and status of progress of Environmental Impacts Assessments (announced to be completed by the end of August, but no information about it), etc.

We therefore urge the Portfolio Committee to interrogate this proposed development thoroughly.

4. Strategic Objective 3.2.1: The target of "one (1) Biodiversity Economy initiative implemented" per year is grossly insufficient.
5. Strategic Objective 3.3.1: the APP should describe what is the nature of the 20 yearly Environmental Awareness activities, who are the targeted audiences, what is the projected reach and impact in the province, etc.
6. Strategic Objective 3.3.2: the APP should describe what is the nature of the 40 yearly Environment Capacity Building activities, who are the targeted audiences, what is the projected reach and impact in the province, etc.

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<sup>1</sup> See Bench Marks Foundation's Policy Gap 9, *South African Coal Mining*, August 2014 ([http://www.bench-marks.org.za/policy\\_gap\\_9.htm](http://www.bench-marks.org.za/policy_gap_9.htm)); and the Policy Gap series on platinum mining (<http://www.bench-marks.org.za/>).

## About Action 24

[Action 24](#) is a 30-month initiative action co-funded by the European Union, aimed at strengthening environmental governance and civic participation, in order to advance decarbonised sustainable and inclusive development in South Africa.

The project namesake, inspired by Section 24 of the Bill of Rights that enshrines the rights of all citizens to a clean and safe environment, intends to achieve this by building the capacity of civil society, media, youth and women groups to more effectively participate in public consultation and legislative oversight, with the anticipated outcome of the realisation of civic rights in respect of a healthy and safe environment and resilience against negative climate change effects.

Action 24 is being implemented by a consortium of partners led by the African Climate Reality Project (ACRP) hosted by Food and Trees for Africa (FTFA), the South African Institute of International Affairs (SAIIA) and the South Durban Community Environmental Alliance (SDCEA) in four provinces, Gauteng, KwaZulu-Natal, Limpopo and the Western Cape.



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