



Rural Action for
Climate Resilience



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Department of Environmental Affairs and Development Planning
Climate Change Directorate, Western Cape Government
Goosain Isaacs

Att: Goosain Isaacs and Karen Shippey
By email: deadp.climatechange@westerncape.gov.za

21 September 2022

Dear Sirs/Mesdames

Comments on the First Draft Implementation Plan for the Western Cape Climate Change Response Strategy: Vision 2050

1. We refer to the draft **Implementation Plan for the Western Cape Climate Change Response Strategy: Vision 2050** (“the Plan”), shared with us for input on 6 September 2022 by the Western Cape Government.
2. Thank you for the opportunity to make input on the Plan. We submit these comments on behalf of the Rural Action for Climate Resilience project, funded by the European Union. The project is made up of three NGOs, the Southern African Faith Communities Environment Institute (SAFCEI), the Social Change Action Trust (SCAT) and Henrich Boell Stifting (HBS), partnered with rural community-based organisations and faith leaders to build social, economic and environmental resilience to climate change. Our comments are informed by our consultations with members of rural community-based organisations in the Western Cape and we gratefully acknowledge Merweville Advice and Development Office, Nelspoort Advice and Development Office, The Sandveld Local Development Agency and the Thuso Advice and Development Centre for their assistance in compiling these comments.
3. Our submission is structured in three parts. We start with comments we made on the **Western Cape Climate Change Response Strategy: Vision 2050** that we would like to reiterate. We follow by general comments on the Plan. Finally, we provide comments on specific sections of the Plan in table form.
4. We would like to reiterate the following comments we submitted in February 2022. We submitted comments on the **Western Cape Climate Change Response Strategy: Vision 2050** (“the Strategy”), where we noted that the Strategy;
 - 4.1 Did not actively include rural voices, women and youth in policy developments;
 - 4.2 Lacked urgency in addressing or emphasising climate adaptation and climate change impacts;
 - 4.3 Lacked detail on the stakeholders and resources required to realise the strategy;
 - 4.4 Lacked clarity on involving national government in achieving some of the broader objectives in the strategy;
 - 4.5 Lacked guidelines or incentives for local government to incorporate the strategy into their local plans.



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- 4.6 Excluded approaches to address loss and damage associated with climate change impacts.
- 4.7 Is heavily reliant on international climate finance and does not outline what alternative sources of finance would be used to achieve its many aspirations.
- 4.8 Did not address the challenge of gathering accurate data to support information systems to collect, process and disseminate climate change information.

5 With our previous comments in mind, our general comments on the Plan are as follows:

5.1 The plan highlights economic impacts and opportunities of climate change but falls short on tangible actions, targets and timelines to build social (and to some extent environmental) resilience to climate change.

5.2 We applaud that the plan specifically recognises vulnerabilities of women and youth (and in some places those who are differently abled), however there is no explicit consideration or addressing of how overlapping factors exacerbate vulnerability, especially the overlapping vulnerabilities of class, race and geographic location, in addition to gender and age. This is crucial considering that the most vulnerable to climate impacts are those who experience multiple overlapping vulnerabilities, such as poor, rurally located, women of colour.

5.3 The plan has consistently overlooked the interests and concerns of rural communities in the Western Cape. This is a significant oversight considering the extreme vulnerability of rural communities to climate change.

5.4 The plan should actively make space for engaging and including indigenous knowledge systems and indigenous knowledge holders in formulating plans, and especially with respect to ecosystem management interventions on fire and wetland rehabilitation.

5.5 The plan claims that from 2025 it will enable carbon sequestration through conservation and regenerative agricultural practices, but the plan refers all agricultural activities to the SmartAgri plan, which emphasizes Climate smart agriculture. Climate smart agriculture consists of practices that continue agricultural intensification and its associated environmental destruction and emissions. It is business as usual agriculture packaged as climate action that prioritises economic interests of big agricultural players and does not reduce emissions or building food sovereignty and resilience.

5.6 Relating to energy, we note that the plan indicates that the government will develop a position on gas as a part of its climate response. While this remains vague, we strongly urge the government not to pursue gas and nuclear energy in developing its energy security plan. Given their environmentally destructive impacts, both at the sites of extraction and energy production, gas and nuclear energy should not be considered a part of a just energy transition.

5.7 The plan refers to the Climate Assembly, as outlined in the Climate Bill, as the primary means for stakeholder engagement and identifies civil society, private sector, academia, women, and youth. We encourage the plan to detail further its role and function, how specific stakeholders will be brought in to ensure that it is a truly representative consultation process. Additional clarity is required on what the actual power of the Climate Assembly will be in effecting change.

5.8 Apart from setting a goal to complete an adaptation pathway for the province by 2025, the plan lacks urgency, timelines and binding commitments in addressing adaptation Rural communities are already experiencing the harsh impacts of climate



change through increasingly hot summers, erratic rainfall and drought that threatens water security and food security, and livelihoods.

5.9 Actions linking to social resilience are vague. We applaud that the Plan has linked climate resilience to social welfare systems, with a focus on food and mental health, but the plan should specify timeframes and actions for this. Additionally, the plan intends to increase food systems resilience by 2030, but lacks detail as to how it will achieve this or measure the progress of this.

5.10 The Technical Climate Change working group is given responsibility for implementing a number of tasks in the plan, many of which lack detail. Given that the working group has not been established, currently the plan may overburden it with responsibility which risks that some tasks will not be prioritised.

6 Our comments pertaining to particular sections in the plan are as follows

Table 1: Specific comments relating to sections of the plan

Page	Specific Wording	Comment and suggestions
p. 8	<i>Municipal capacity building in respect of best practice climate resilient development</i>	Municipalities are given responsibility for building their own capacity in climate-resilient development. It is unclear how this will be achieved. Municipal capacity is often low. This raises questions as to whether this is a reasonable allocation of responsibility, especially as provincial government has a mandate to support capacity building at a local government level.
p.8-9	<i>Capacitate people living in informal settlements to become resilient through innovative responses to climate risks</i>	Capacitation within the informal settlements to build community resilience should begin as soon as possible. Starting in 2030 is far too late. Informal settlements are some of the highest risk communities to extreme weather events, and need urgent immediate attention. Local municipalities should also be involved, rather than just the provincial Disaster Management centre
p. 40	<i>Capacitation of informal sector</i>	Responsibility has not been assigned to any institution to coordinate and implement this. It is essential this is assigned so as to ensure accountability of actions.
p. 25	<i>Communications campaign focused on highlighting spatial and weather-related risks"</i>	This action is likely to be inadequate to avoid or address informal settling in risky areas, and problematic given the recent forced removals of informal settlements in the province. A communications campaign does not address the lack of alternative adequate housing options for people.
p. 29	<i>Updating SmartAgri plan</i>	This action requires active engagement with agroecological approaches and principles in this plan and challenge the climate smart agricultural practice that are currently encouraged in it. Recommend review of this plan, rural voices and their concerns must be actively included and addressed in the updating process (small scale, subsistence farmers, indigenous knowledge systems, informal sector farm labourers).



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p. 31	<i>Climate Assembly</i>	We highlight the need for active inclusion of vulnerable voices, in particular rural voices, that may not be adequately represented by already established civil society organisations. There needs to be specific space for inclusion of community base organisations, independent of larger civil society actors, that are deeply embedded within communities to ensure adequate stakeholder engagement.
p. 13	<i>Water security plan</i>	The plan should ensure the active engagement with rural communities during the transversal participation, to ensure their concerns on their already challenged water access are addressed and prevent repetition of the issues faced with “day zero”.
p. 29	<i>Mitigate the risk of wildland-urban and wildland-agriculture interface fires through appropriate ecosystem management...</i>	The plan should also focus on mitigating the risk of fires that occur between informal settlements and wildlands, or farms and informal settlements in rural areas. There is an opportunity here to encourage and engage with Western Cape’s indigenous practices and knowledge holders with respect to fire management in the fynbos and to protect biodiversity.

Thank you for the opportunity to submit comments on the draft **Implementation Plan for the Western Cape Climate Change Response Strategy: Vision 2050**. We invite discussion on any aspect hereof, should this be necessary or useful.

Yours sincerely,

Francesca de Gasparis (she/her)

Executive Director

Southern African Faith Communities Environmental Institute, SAFCEI

t + 27 21 701 8145

francesca@safcei.org.za