



groundWork submission on: National Climate Change Response White Paper 2011

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Introduction

The National Climate Change Response White Paper [WP] reiterates the international target of keeping temperature rise below 2°C and warns:

Even under emission scenarios that are more conservative than current international emission trends, it has been predicted that by mid-century the South African coast will warm by around 1-2°C, and the interior by around 2-3°C. After 2050, warming is projected to reach around 3-4°C along the coast, and 6-7°C in the interior. With these kinds of temperature increases, life as we know it will change completely ...

Along with the rising temperature come intensified floods and droughts, fire and disease, mass extinctions of plant and animal species and rising sea levels as documented in more detail in government's Second National Communication to the United Nations Convention on Climate Change (UNFCCC) [NC2]. Globally, and in South Africa, the impacts of climate change are hitting sooner and harder than anticipated and we can expect that current projections will also be overtaken. With the global average temperature up 0.9°C from pre-industrial levels, we are already experiencing dangerous climate change.

The WP focus is limited to climate change but we note that this is only one aspect of global environmental change threatening economies and people's livelihoods. The ruin of land, fresh water and the oceans makes people and their environments more vulnerable to climate change. Environmental 'services', particularly for clean water, are now in jeopardy in many areas of South Africa and engineered responses will become increasingly expensive and unfeasible. Much of South Africa is already water stressed and much of the engineering that has turned South Africa's rivers into a giant national plumbing system is to compensate for the pollution of water as much as for the lack of it. Acid mine drainage from working and abandoned mines now threatens an environmental catastrophe that, for South Africa, will be of the same order as the catastrophe of climate change.

To put the anticipated temperature rises in perspective, the difference in average global temperature between an ice age and temperate age is about 5°C. With 6-7°C warming, the interior will become unliveable – life as we know it will indeed be scarcely recognisable. The White Paper, however, does not face what it sees coming. It is caught between the recognition of the seriousness of climate change and government's priority for economic growth and 'international competitiveness' – that is, the priority to maintain the world in which present economic assumptions hold good. It cannot step beyond economic realism to get real about the climate. It therefore proposes two sets of action – for adaptation and mitigation – which are embedded in the very view of the world which brought on the crisis.

We note that never-ending growth is not compatible with serious mitigation.¹ There is no 'carbon space' left. Moreover, growth has been accompanied by growing social inequality compounded by the externalisation of environmental costs mostly onto the poor. The boom years to 2008 took GDP growth to 5.5% but were accompanied by increased pressure on the poor through escalating prices, notably for food and energy. We believe that in the coming years growth will fail for three reasons: first, the 2008 capital meltdown was the first round of a global economic depression that will intensify in the coming years; second, declining global energy production following peak oil will strangle the 'green shoots' of economic recovery; and third, in the longer term, climate change costs will exceed the value of growth.

We note further that the supposed 'delinking' of economic and carbon emissions growth has been achieved nowhere. A supposed reduction of carbon intensity has been achieved only in some Northern economies and only by exporting carbon- (and pollution-) intensive production to Southern economies. In the 2000s, global carbon intensities increased in all regions, North and South,² and this trend was not reversed in 2008.

We therefore propose that the idea of development should be delinked from growth. Sustainable development founded on economic, social and environmental justice should

¹ Anderson, K. and A. Bows, 2008. *Reframing the climate change challenge in light of post-2000 emission trends*, Philosophical Transactions of the Royal Society. doi:10.1098/rsta.2008.0138, Published online.

² Raupach, M., G. Marland, P. Ciais, C. Le Quéré, J. Canadell, G. Klepper and C. Field, 2007. *Global and regional drivers of accelerating CO₂ emissions*, Proceedings of the National Academy of Sciences available at www.pnas.org.

replace economic growth as the central organising principle of development. This means a commitment to growing human solidarity and equality as well as a relationship to the environment which enhances rather than degrades the functioning of eco-systems both for their intrinsic value and for the eco ‘services’ they provide. The Constitutional mandate for such a redefinition is found in the Environment Right which is concerned both with inter-generational rights and with intra-generational rights.

This does not imply that economy and production are unimportant, but that the economy must be redefined to serve people rather than people serving the interests of accumulation. It also implies international cooperation rather than competition in the management of economies. We believe that facing up to the climate challenge creates an absolute imperative for cooperation.

Objectives

The WP opens with two objectives: to make a fair contribution to global mitigation and to adapt to inevitable climate change impacts.

Adaptation is already an unwelcome necessity but, without serious mitigation, adaptation will fail. In South Africa, adaptation is already failing – even before it starts. This is because environmental integrity, including the relation of people to their environments, is the foundation of adaptation. People’s well-being and the well-being of their environments, now and in the future, are intrinsically linked. In South Africa, to the contrary, the priority for capital has resulted in the wholesale destruction of environments, as documented in the official Environment Outlook,³ as well as the impoverishment of people. The effect is to amplify climate impacts while undermining the resilience of both people and eco-systems.

The WP says nothing of South Africa’s approach to the international negotiations with respect to the global carbon budget and how it should be allocated. Consequently, there is no discussion of the basis for a ‘fair contribution’ to global mitigation except by generally implicit reference to other documents.

The 2°C target is, in the words of climate scientist James Hansen, a recipe for disaster.⁴ The risk of runaway climate change – the point at which natural feedback becomes more significant than anthropogenic emissions – is already evident and becomes a near certainty at two degrees. Present commitments made under the Copenhagen Accord and sanctioned at Cancun will result in 4°C warming from emissions alone. Climate feedbacks will push this to 9° or more. The commitments are dissociated from any global carbon budget and, being voluntary, will be ignored by countries which find them inconvenient. They are, like the supposedly binding Kyoto commitments, mere pieties. The credibility of the international

³ DEAT, 2006. *South Africa Environment Outlook*.

⁴ See Hansen et al, 2008, *Target Atmospheric CO₂: Where Should Humanity Aim?* Submitted at arXiv.org, April 7, 2008 and revised June 18, 2008 (ref: arXiv:0804.1126v2).

process can only be restored through an entirely new approach, however difficult that may be politically.

The WP reiterates South Africa's Copenhagen Accord pledge to reduce emissions by 34% by 2020 and 42% by 2025 below the business-as-usual baseline – emissions still rise but less steeply than in the baseline – followed by a decade-long 'plateau' and an actual decline in emissions after 2035 [6.1]. We commend government for putting emission figures to this pledge, first in a presentation to parliament and to Nedlac in March 2011⁵ and, in a second revision, in the Explanatory Note that accompanies the WP.⁶ But we are dismayed by the manner of their calculation: The WP cheats the figures to create more 'carbon space'.

This pledge was said to be based on the Long Term Mitigation Scenarios, a research document commissioned by the Department of Environmental Affairs in 2007. The LTMS constructed two scenarios: Growth without Constraints (GWC) which is used as the business-as-usual baseline for the Copenhagen pledge; and Required by Science (RBS) which shows the emissions path necessary for South Africa's contribution to avoid warming of more than 2°C.

The GWC baseline shows emissions of about 750 million tonnes (mt) of CO₂e per year in 2020 and 870 mt in 2025 and so indicates emissions targets of 495 mt in 2020 and 504 in 2025. In the March presentations, government confirmed that current emissions are around 542 mt CO₂ per year – as forecast with little error in GWC. The power sector expansion (Eskom's new build plus IPP coal plants) will push that up by 80 to 90 mt a year by 2018. So, excluding emissions growth from transport and industry, emissions will rise to 620 mt.

Rather than propose urgent action to get back on track, government suggested 'a new expression of our objectives' to take account of an assumed 'error range' in the GWC projection. The 2020 target could then be put at between 418 and 571 mt and the 2025 target at between 412 and 599. The LTMS did not give an error range so this is an entirely arbitrary fabrication of data done to increase permissible emissions under the Copenhagen pledge. It evidently did not suffice, so the second version enlarged the error range to give upper limits of 583 mt for 2020 and 614 mt for 2025 as given in the WP [6.4.2]. The lower limit (398 mt for both 2020 and 2025) is entirely irrelevant and there merely to simulate objectivity. The table below lays out the figures.

⁵ Department of Environmental Affairs. *Defining South Africa's desired mitigation outcomes – research, concerns, issues and proposals*. Presentation to the Parliamentary Portfolio Committee for Water and Environmental Affairs. 29 March 2011, Cape Town.

⁶ DEA, *Defining South Africa's Peak, Plateau and Decline Greenhouse Gas Emission Trajectory*, Explanatory Note, Revision 4.0 (12/10/2011).

Table 1: South African emissions and promises

	Actual		LTMS (GWC)		LTMS (RBS)		Copenhagen offer		Copenhagen 'revised' (March)		Copenhagen 'revised' (WP)	
	Dates	2004	2011	2011	2020	2025	2020	2025	2020	2025	2020	2025
CO ₂ e mt		440	542	545	750	870	460	453	495	505	418- 571	412- 599
											398- 583	398- 614

NB: In the Copenhagen 'revised' figures, only the upper limit counts.

The LTMS is repeatedly invoked as the basis for the Copenhagen pledge with the implication that this represents a fair contribution based on the science. However, government has presented no argument based on science to justify expanding the carbon space beyond RBS. Hence, there is no basis whatever for the claim that the WP represents a fair contribution to the global mitigation effort and the objective seems to be to deceive.

Moreover, the LTMS RBS scenario itself misses what is really required:

1. It assumes the disastrous 2°C target. Following Cancun, a 1.5°C target is on the table for discussion. The Africa group is calling for this target and it is therefore puzzling that the WP ignores it. If adopted, it implies a much earlier peak and steeper decline.
2. It takes stabilisation at 450 ppm CO₂e to be adequate to that target. The IPCC's Fourth Assessment Report [AR4] says this gives only a 50% chance of temperature stabilisation in the range of 2°C-2.4°C.⁷
3. It gives 2015 as the target date for peak global emissions, whereas the AR4 says emissions must peak between 2000 and 2015.
4. It assumes a 50% global reduction in emissions by 2050 with 80% reduction by Northern countries taking account of common but differentiated responsibilities. AR4 says that reductions in the range of 50-80% are required by 2050 to meet 450 ppm stabilisation.

In short, the LTMS takes the least demanding end of the range in all cases. Meanwhile, numerous studies produced since publication of the AR4 in 2007 show that climate impacts are happening harder and faster than previously anticipated. In particular, AR4 did not take adequate account of climate feedbacks and its estimates of climate sensitivity are consequently conservative. The implication is that the most demanding end of the range should be taken as the minimum 'required by science'.

The 'peak, plateau and decline' trajectory should be urgently amended to take account of:

- the actual rise in emissions since the LTMS 2003 base year;
- the latest science; and
- the 1.5°C target.

Finally, the Copenhagen Accord pledge is made conditional on financial and technology support from developed countries [6.1]. We support the demand that rich countries pay their

⁷ The IPCC's 2007 Fourth Assessment Report is cited by the LTMS.

climate debt but this implies that South Africa’s will to act in the interests of its people depends on what rich countries do. We support Earthlife Africa’s argument that this is contrary to the Constitution.

Principles

The WP names 9 principles in place of the Green Paper’s 6 principles. The GP’s ‘people-centred approach’ has been replaced by three principles: equity; special needs and circumstances; and uplifting the poor and vulnerable. The effect is to weaken rather than strengthen the transformative potential of good policy. Thus, the policy treats women as inherently more vulnerable than men rather than more vulnerable because they are subordinated through the politics of patriarchy. Similarly, the poor are treated as objects without agency. By contrast, a real commitment to a people-centred approach would require a determination to support people’s struggles to change relations of power.

The GP’s strong language on ‘informed participation’ has been watered down in the WP. This perhaps follows criticism that the policy process has not lived up to the language, that business has been given an inside track – evident, for example, in the development of the LTMS⁸ – and the process has been overly reliant on access to electronic media and elite venues in urban centres. The pattern is repeated in the short timeframe allowed for comment on the WP. It excludes most people from engaging with it and suggests that their participation is less important than producing the policy in time for a photo-op at CoP17. We believe that, rather than watering it down, the GP language – that “all people” should have the opportunity for “equitable and effective participation” – should be honoured.

We note that our own capacity to respond to the WP reflects our privileged access to electronic media. We think that our submission is compromised by the exclusion of the majority of people and particularly of those who are most exposed to the impacts of climate change.

The principle that is not stated, but which subordinates and contradicts the named principles, is grandfathering. In climate mitigation terms, grandfathering allows those who emitted most in the past the greatest rights to pollute in the future. This is the basis of the reduction commitments mandated by the Kyoto Protocol: developed country signatories must reduce emissions from the level arrived at in 1990. The higher that level, the larger their ‘carbon space’. The principle then cascades down through the system to the level of corporations. In developing countries, the logic is picked up through the carbon trading mechanism – the ‘clean development mechanism’ (CDM) – which rewards big polluters for polluting a little less than they would do under ‘business as usual’. Far from paying, the polluter is rewarded.

⁸ A rough breakdown of participants by stakeholder groups shows: government 35; industry 19; civil society 9, including 2 from labour; and a sprinkling of academics and consultants.

Globally, grandfathering represents the interests of capital in general and of the Northern powers. In South Africa, it responds to the interests of the minerals-energy complex which has shaped carbon intensive and unequal development over the last 150 years. It represents the will to preserve a carbon intensive ‘path dependency’ and contradicts the WP’s repeated invocation of a transition to low carbon development.

Grandfathering is implicit in the Copenhagen Accord pledge to reduce emissions below the business-as-usual baseline in preference, for example, to using RBS to define South Africa’s commitment. It is even more obvious in the manipulation of this baseline, described above, to enlarge the carbon budget defined by the ‘peak, plateau and decline’ trajectory. The sector ‘carbon budgets’ [6.1], defined in relation to this trajectory, similarly follow the logic of grandfathering and bear no relation to the concept as used in climate science.

Grandfathering is further indicated by South Africa’s long-running support for carbon trading and the clean development mechanism (CDM). The WP assumes support for “carbon trading and off-set schemes” [10.2] without justification. The Kyoto Protocol is a cap-and-trade scheme which, in neo-liberal economic theory, works only if the cap is universal. In practice, the market has not served to reduce emissions but, corrupt from the start, has served to transfer wealth to the rich. At Cancun, the cap was thrown out but trading retained without even the justification of a disreputable theory.

The WP also says that a national emission trading system will be investigated [10.2]. Since the sector carbon budgets are adopted specifically to “provide for flexibility and least-cost mechanisms [6.1.3] such as offset and other types of market mechanisms” [6.5], it seems that the decision for trading is already implicit in the use made of carbon budgets. We note that a rigorous use of carbon budgets based on climate criteria would allow little room for displacing carbon allowances across sectors or across time through delayed reduction.

Alternatives to grandfathering include approaches which, first, recognise the global carbon budget and, second, allocate it according to historical responsibility, recognising the ecological debt of rich to poor both between and within nations, or equal per capita entitlements assigned to all people, or a combination of the two.

Adaptation

Water

WP correctly identifies water as a key vulnerability. It sees two major challenges: limited water resources and equitable distribution. It omits the wholesale pollution of water and the destruction of aquifers by the corporations at the centre of the minerals-energy complex. We welcome that it has cut the Green Paper’s reference to ensuring that “clean water is available for blending to dilute pollutants”. However, it has also left out the enforcement of rigorous water quality standards. We note that lax regulation that has allowed 100 mines to continue operations without a water license.

Agriculture and forestry

Despite discussion of the environmental (and hence, adaptation) problems, the broad intention is to preserve current economic interests in agriculture and forestry and expand them where possible (see also NC2). We would welcome the affirmation of small-scale, labour intensive ‘techniques’ but these techniques are not defined and we do not see a concerted policy shift to support it. Conservation agriculture was endorsed (albeit ambiguously) in the Green Paper but is now mentioned only in respect of ‘rural settlements’ (i.e. the former homelands). Urban agriculture is entirely ignored.

Commercial forests are held to store carbon. This is disputable. Studies elsewhere have shown that carbon stored in industrial plantations does not compensate for the loss of soil carbon consequent on the conversion of grasslands.⁹ Emissions from energy intensive mills and from short-lived products such as pulp and paper are ignored. Emissions from the likely increased “frequency and intensity” of fires [GP: 24] consequent on climate change are likewise ignored.

Health

Likely health impacts are broadly covered in WP. Here, we comment specifically on points concerning air pollution. In this context, we note that DEA officials estimate that health costs related to air pollution cost the state R4 billion each year.¹⁰

In NC2, adaptation measures include “the application of more stringent emission standards and pollution control” under the Air Quality Act [129]. WP mentions only ambient standards and only for SO₂, particulates (PM) and ozone. We emphasise that emission standards are critical if the polluter pays principle is seriously intended. The present suite of standards (ambient and emission) needs to be both more stringent and more inclusive as recommended by the South Durban Health Study.¹¹ As a priority, standards for fine particulates (PM_{2.5}) are urgently needed, both because they have major implications for people’s health and because they can be ‘fingerprinted’ to source.

The record of enforcement is unconvincing. Local authority capacity is highly uneven and, even in the best cases, an apparent reluctance to confront sources results in a reactive approach. Four years after being declared the first ‘priority area’ there is no discernable improvement in the Vaal Triangle’s air quality or local authority capacity. Ambient standards for PM₁₀ were exceeded for much of the winter period without the local authority even being aware of it. ‘Full compliance’ is therefore eagerly awaited. Similarly, disaster management [5.9] depends on government working in an open and transparent way with community

⁹ See for example, Mae-Wan Ho, *Scientists Expose Devastating False Carbon Accounting for Biofuels*, Institute of Science in Society, November 2010.

¹⁰ See <http://www.iol.co.za/news/south-africa/air-pollution-causes-health-costs-to-soar-1.461210>

¹¹ Naidoo, R., N. Gqaleni, S. Batterman and T. Robins, 2006. *South Durban Health Study*, Centre for Occupational Health, University of KwaZulu Natal; Department of Environmental Health Sciences, University of Michigan; Department of Environmental Health Sciences, Durban Institute of Technology.

people. This is not evident in, for example, south Durban where people are regularly faced with industrial incidents.

Indoor pollution has severe impacts on health. We welcome the commitment to ensuring thermal efficiency in low-cost housing [5.6.2] but we see nothing that addresses people's need for clean energy. NC2 includes the Basa Njengo Magogo as a residential efficiency measure and, for the poorest, the Basa appears to be government's main response. At best, this reduces without eliminating indoor pollution from braziers and is a diversion from people's demand for clean energy.

Mitigation

We comment on mitigation under Objectives and Principles above. Here we restrict our comments to some issues relating to the energy sector.

First, various policies for internalising environmental externalities, demand side management, energy efficiency, renewable energy targets, etc were ignored in favour of the real policy of cheap power to industry until the power tripped out in 2008. Once Eskom has built its new plant and is no longer constrained by a tight spinning margin, it will be under pressure to revert to pushing sales to pay off exorbitant capital costs.

IRP 2010 is given as an example of “an existing implementation mechanism” through which a low-carbon development strategy may be implemented [6.6]. As it stands, the IRP does nothing to address the energy intensive demand side of the minerals-energy complex. Mining and industry uses over 60% of electricity and the 36 members of the energy-intensive users group consume 40%. All but six of the group are in mining and mineral processing or fuels and chemicals. BHP Billiton’s three aluminium smelters consume over 10% of Eskom’s production for which Billiton paid as little as half the costs of production in 2008. Both energy and subsidised profit is exported.

Energy efficiency is essential but must be preceded by the question of what the energy is for. In a capitalist economy, efficiency leads to the long term expansion of the energy system: increased energy efficiency is another form of increased productivity and the benefit is taken in profit ahead of overall energy saving. The profit must be reinvested – whether in renewables, fossils, Hummer plants or perfumeries – to continue never-ending accumulation.

The challenge is rather to transform the energy system to enable people to live well with each other and the earth. Efficiency would then be a function of energy conservation aimed at radically reduced consumption. In this context, a 100% renewable system composed of local grids supplemented by the national grid becomes feasible.

In contrast, the IRP 2010 is a power expansion plan. Eskom’s current new build adds 17,000 MW capacity and is based almost entirely on coal supplemented by diesel fired peaking plant. IRP 2010 provides for private ‘own generation’ fossil plants to be built by major

corporations. Taken together, this will add something in the order of 100 mt/y to South Africa's carbon emissions. This is not compatible with a serious response to climate change.

We support the intention to scale up renewables and to localise production and so maximise job creation [8.3]. Given their past neglect there is evidently a large untapped potential. We note, however, that current measures are biased toward privatising renewables in corporate hands and biased against micro systems of less than 1 MW. In the same way, government seems to regard all 'green' economy initiatives as reserved for the private sector [10.3.1]. We believe that the objective of growing local and democratic control of energy systems should be central to the energy programme.

WP avoids mentioning nuclear power. It is nevertheless given priority in IRP 2010. We do not believe that nuclear power can be justified by climate concerns. It is low-carbon only at the point of generation. The rest of the nuclear supply chain is carbon intensive. The additional environmental, financial and social risks of nuclear power cannot be justified.

The WP proposes a carbon capture and storage (CCS) flagship programme. We oppose CCS for the following reasons:

- It has not been shown that either capture or storage will work at the scale required anywhere in the world.
- It is very expensive both to build and to operate – requiring a global infrastructure on the scale of the oil industry. Even if separation plants are built, there can be little faith that utilities looking to cut costs will not switch them off when no-one is looking. Meanwhile, the money spent on CCS is not available for more convincing responses.
- Separating CO₂ will consume around 30% of the energy produced by the power station and thus substantially reduce their efficiency. Sasol's CTL process allows for a relatively cheap separation of a portion of its carbon emissions. On Sasol's own account, CCS would at best reduce its emissions to the level of those emitted in producing fuel from conventional crude oil.
- Underground carbon storage requires very particular geological formations. The newly minted 'CO₂ Storage Atlas', prepared at the behest of government, Eskom, Sasol and other minerals-energy complex corporations, shows that potential (not proven) sites are remote from industrial areas and mostly off-shore.

As with the power system, government appears intent on expanding liquid fuels as fast as possible. Refining capacity was dramatically expanded through the 90s. Sasol is currently expanding its Secunda plant and, with government support, investigating the feasibility of a new CTL plant in the Waterberg. State-owned PetroSA plans to build the very large 400,000 barrel a day Mthombo refinery at Coega. Two new pipelines are under construction: a large multi-fuel pipeline from Durban to Gauteng – with the Durban end purposely routed through poor areas; and a private Maputo-Gauteng line.

Government's promotion of oil and gas exploration is similarly not compatible with a serious response to climate change. The award of shale gas exploration rights in the Karoo Basin is

of particular concern given the growing evidence of serious groundwater pollution caused by hydraulic fracturing (or fracking) in the US. In climate terms, shale gas extraction is energy intensive in itself and makes use of a range of toxic chemicals produced from energy intensive processes. Lower carbon emissions from gas combustion as compared with oil or coal are therefore off-set. Moreover, the US EPA has recently doubled its estimate of methane emissions from well vents and pipeline leaks, leading to a serious revision of the assumed benefits even of conventional gas.

We support the proposal for a ‘modal shift’ in transport and, more particularly, for planning that enables public transport, cycling and walking. The WP does not, however, address the broader issue: current planning assumes the ‘consumption city’ and is inherently biased to the rich because increased consumption is associated with economic growth. Both public and private investment is then directed to rich areas. A shift to planning for sustainable neighbourhoods, of prioritising people over growth, is called for.¹²

Carbon tax

WP proposes a tax on carbon emission. We note:

1. The Treasury discussion paper which indicates that, as an economic measure, a tax is more effective and easier to implement than carbon trading.
2. The tax will have little effect unless it is very substantial. In this context, protecting “the competitiveness of key industries” [10.7.1] puts the purpose of the tax in question. As Eugene Cairncross observes in respect of power, domestic tariffs are already high whereas heavy industry tariffs are below cost and may remain so even with the tax. These skewed tariffs need to be addressed irrespective of a tax.
3. A tax is regressive and cannot be introduced without measures to protect poor people. The WP says “The minimisation of the potential regressive impacts on the poor ... will be considered.” This is not good enough. Measures must be specified and should include: an expansion of free basic electricity as the first step in an inclining block tariff together with energy efficient programmes to ensure that all people can survive in comfort on the free supply; the extension of free services or proportionate support to other clean energy sources; expanded and free public transport. The broader inflationary impact on the poor must also be addressed.

Other issues

In general, we will welcome improved information, including mandatory emissions reporting, monitoring and evaluation. The system should include criteria relating to the much repeated word ‘sustainable’. Without clarity on this, destructive technologies, projects and programmes may be brought in with a green label. We note that government will need to

¹² Swilling, M. 2006. *Sustainability and infrastructure planning in South Africa: a Cape Town case study*, Environment and Urbanisation.

develop the required capacity to implement a monitoring and evaluation system with full public participation.

We agree that climate should be a focus for all departments and spheres of government. We trust that this will meet with greater success than the similar attempt to integrate environment through the National Environmental Management Act.

‘Mainstreaming’ climate, however, falls short of what is needed. The climate challenge will not be met without a thorough transformation of the economy. We are sceptical of the contribution of private institutions driven by profit, particularly the finance sector [11.1.1]. Such institutions have found a new source of profit in carbon trading with no climate benefit. Carbon markets have not “optimised efficiency” [10.7.2] and we oppose the idea of a national trading scheme.

For similar reasons, international climate finance under the UNFCCC should be grant funding from public sources. While we think this should include innovative sources such as financial transaction taxes and the diversion of military spending, the “comprehensive suite of measures” [11.1.2] sounds very much like anything goes. Climate finance must be free of policy conditionalities but cannot be free of accountability. Transparency on what is spent, and for what, is essential. The independence of climate finance institutions [11.1.3 & 4] from interests attached to the carbon economy is similarly important.

Conclusion

In summary, we observe that the LTMS shows that an adequate response to climate change cannot be made within the confines of current planning models. The assumption that informs these models is that economic growth constitutes the central organising principle of development. This is not because growth is needed to alleviate poverty but because it is needed to reproduce capital. This is what determines the bounds of realism in planning and it is this realism that has produced the crisis of climate change, the crisis of peak oil and the political and economic crisis gripping global capital.

Thus, the LTMS energy modelling assumed ever increasing demand but could not reconcile this with even the inadequate carbon reductions of its ‘required by science’ scenario. The GP, like the LTMS, is founded on an absolute commitment to growth. To address climate change and meet the needs of people there must be a radical redefinition of what is meant by development and who defines it.

First, the central organising principle should be sustainable development founded on economic, social and environmental justice.

Second, localisation is essential to any serious programme of mitigation and requires that national resources should be focused on supporting people’s capacities to direct local development.

Third, if we are to address climate change another energy future is necessary. We call for people's energy sovereignty founded on democratic and local control.

Fourth, the transition to a different energy and development order will require energy inputs from the declining fossil fuel system. If these investments go into the declining system, they will represent a permanent loss. What remains of the carbon budget should therefore be used to build the new system.

Fifth, food is the most basic form of energy for people and the food system must be thoroughly transformed to enable people to define and take control of production and consumption and hence of their own futures.

Finally, we believe that a 'people centred approach' means an open-ended process of transition to a society in which people are actively and consciously making the decisions that shape their collective future.

End:



The logo consists of the word "groundWork" in a sans-serif font. The word "ground" is in black, and "Work" is in a green color. A horizontal green line underlines the "Work" portion of the word.