



PUBLIC PROTECTOR
SOUTH AFRICA

PUBLIC PROTECTOR
MOSIRELETSI WA BATHO ● MOSIRELETSI WA BATHO
MUSIRHELELI WA VANHU ● MUTSIRELEDZI WA VHATHU
OPENBARE BESKERMER ● UMKHUSELI WABANTU ● UMWIKELI WABANTU

NATIONAL OFFICE
PRIVATE BAG X677 PRETORIA 0001 ● HILLCREST OFFICE PARK, 175 LUNNON ROAD, PRETORIA
TEL: (012) 366 7000 ● Fax: (012) 366 3473

PUBLIC PROTECTOR COMPLAINTS FORM

FOR OFFICE USE File number: Date received: Received by:
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1. PLEASE READ THE ATTACHED TO THIS FORM BEFORE FILLING IN YOUR DETAILS.
2. PLEASE WRITE CLEARLY AND USE **CAPITAL LETTERS**.

YOUR DETAILS

1. **Your name**
Mr.... ASHLEY
Initials: B.....
2. **If your complaint is about a pension or ID document matter, please provide your ID number.**
ID number
.....N/A.....
3. **Your address and telephone and telephone number(s)**
The address where you live:
The address we can send letters to:
Telephone number (CELLULAR):
Code: Number: ..082 085 7088.....
Telephone number (work):
Code ..012..... Number: ...447 5770.
Is there any other telephone number we can call you at:

4. If this complaint is for someone else, please tell us about them.

Miss, Mrs, Mr? Surname:

Initials:

5. Their ID numbers, if the complaint is about pension or ID document matter.

ID number:
.....

6. Their address and telephone Numbers.

The address where they live:

.....

Postal code:

7. If this complaint is for an organisation, please tell us the name of the organisation.

Alternative Information and Development Centre (AIDC) and others -
The complaint is laid in the public interest by the AIDC and endorsed by the following NGOs :
Centre for Environmental Rights (CER); - contact Robyn Hugo;
Earthlife Africa (ELA) Johannesburg; - contact Dominique Doyle;
Federation for a Sustainable Environment (FSE); - Director: Mariette Liefferink;
GenderCC; - contact: Dorah Marema;
Greenpeace Africa; - Climate and Energy Campaigner: Penny-Jane Cooke;
Groundwork; - Director: Bobby Peek;
Mining Affected Communities United in Action (MACUA); – Coordinator: Meshack Mbangula;
Project 90 by 2030; - contact Richard Halsey;
South African Climate Action Network (SACAN); - Coordinator: Happy Khambule;
South African Faith Communities Environmental Institute (SAFCEI); - contact Liz McDaid;
South African Green Revolutionary Council (SAGLC) – Director: Mathews Hlabane;
350.org Africa; - contact: Landry Ninteretse;

What does it (e.g. Civic, NGO, business, retailer, factory)

NGO – (non-profit civil society organisation)
.....

Who should we talk to there?
What is their position (e.g. Colleague, chairperson, etc.)

Brian Ashley
Director.....

The address we can send letters to:

129 Rochester Street, Observatory
P.O. Box 1139, Woodstock

Postal code: .7925.....

Telephone number: Code: 012 Number: 447 5770

Fax number: Code: 012 Number: 447 5884..

TELL US ABOUT THE COMPLAINT

- 8. Is the complaint still happening? YES:
- 8. If no, on what date did it happen? n/a
- 10. Where dit it happen? National government
- 11. Which government agency is involved? The Inter-Ministerial Committee on Climate Change and the Department of Environmental Affairs....
- 12. Tell us the names of the officials that you contacted to try and solve the problem. Minister Edna Molewa (Department Environmental Affairs)
DDG Judy Beaumont. (Department Environmental Affairs); also CD Deborah Ramalope.
- 13. Where can they be reached? Address: Environment House, 473 Steve Biko, Arcadia, Pretoria,

Postal code: ...0083.....

Minister Molewa’s Chief of Staff: Ms Zanele Mngadi :
Telephone: +27 12 399 8745
Cell: +27 82 330 1148
E-mail: Zmngadi@environment.gov.za

DEA switchboard:
Telephone number: Code: 102 Number: 399 9000.
- 14. Have you reported this case to anyone else? No:
If yes, who (e.g. police, a lawyer, etc.)
- 15. Please tell us how you heard about the Public Protector (radio, newspaper, poster, friend)? The Constitution and the media
- 16. In this space provided below and you need more space, please use a separate piece of paper, that

**will be provided to you. Please
attach copies of any relevant
correspondence or documents.**

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Purpose:

This complaint to the Public Protector seeks an urgent instruction to government to elaborate national climate change mitigation objectives, as required in the 2011 White Paper and relevant plans, inter alia the National Develop Plan, so as to allow for responsible and integrated development planning and coherent public investment strategy.

Rationale and overview:

National development planning and sound financial management require that South Africa has clear and coherent objectives for greenhouse gas emissions reduction over the medium and long term, particularly regarding emissions from energy supply and use, which account for over 80% of the national total. South Africa has committed to a transition to a low-carbon and inclusive economy, in a range of policy and planning documents and high-level statements. The National Climate Change Response White Paper (NCCRWP) of 2011 provides for the setting of desired emission reduction outcomes (DEROs) for sectors or sub-sectors, both for the medium term, 2030, and the long term, 2050.

The NCCRWP calls for setting DEROs within two years of its adoption. Several relevant processes have been undertaken that are relevant to, but have stopped short of proposing medium- and long-term DEROs and no guidance regarding desired emissions pathway(s) was provided to the Integrated Energy Planning process of the Department of Energy during 2013/14 consultations, beyond the broad range included in the White Paper. Stakeholder engagement on DEROs led by the Department of Environmental Affairs reached an impasse at a workshop in February 2015, since which time work on DEROs has effectively been suspended.

When the issue was raised at the multi-stakeholder National Climate Change Committee (NCCC) in March 2016, it was referred to a process for updating the Mitigation Potential Analysis (a study published in November 2014), to be undertaken 2016/17. However, at a July 2016 NCCC meeting it was communicated that this process is now on hold, in deference to a much-deferred planning process under the Department of Energy (the IRP). Furthermore, the most recent policy document subsequently issued by the DEA (DEROs Explanatory Note No. 4) suggests that the “mitigation system” now being developed will not include 2030 and 2050 DEROs.

The enduring lack of clear climate change mitigation policy objectives to 2030 and beyond causes financial risks and uncertainty, precludes integrated development planning and undermines the prospects for sustainable development and eradicating poverty. Particularly problematic is that the Department of Energy is proceeding with procurement and long-term investment planning in the absence of a low-carbon energy proposition or coherent transition strategy, or any transparent process to consider mitigation requirements beyond 2020.

The NCCRWP identifies the Inter-Ministerial Committee on Climate Change as responsible for ensuring timely implementation and necessary coordination and cooperation amongst departments and is thus the subject of this complaint, through the Chairperson Minister Molewa.

There is sufficient information and analysis available for the Update of the Mitigation Potential Analysis (for which funding has been confirmed) and the setting of DEROs through multi-stakeholder engagement to proceed immediately and in parallel, should the IMCCC instruct Directors General to this effect.

The nature of the complaint:

The complaint is of maladministration and undue delay by government with respect to implementing the 2011 National Climate Change Response White Paper, as well as associated development planning and multilateral commitments, with regard to mitigation and most particularly regarding medium-term emissions reduction imperatives and opportunities, as provided for in the White Paper as the 'Desired Emissions Reduction Outcome' (DERO) for the medium-term.

The fundamental issue, which constitutes maladministration, is the absence of timely planning or any transparent deliberation of the low-carbon development pathway and energy transition that is required in South Africa, both as a practical necessity for sustainable development and to implement existing policy and plans, including the National Development Plan. The lack of responsible transition planning (beyond 2020), in the context of accelerating change and upheaval in energy development globally, puts the entire economy at risk, including the value of institutional investments including the Government Employees' Pension Fund.

The complaint is directed at the government lead agent on climate change – the Department of Environmental Affairs (DEA) - and the Inter-Ministerial Committee on Climate Change (IMCCC), which the White Paper provides: "shall oversee all aspects of the implementation of this White Paper. In particular, the Minister of the Environment will chair the IMCCC, which will oversee the implementation of the National Climate Change Response Policy, including the sectoral desired emission reduction outcomes and carbon budgets development process and adaptation intervention prioritisation process." (Section 10.2.2; p.37)

This complaint includes or is linked to the fact that major energy infrastructure investments are being considered, in the absence of credible or relevant energy plans and contrary to the Energy Policy White Paper (1998) and the National Energy Act (2008), which is primarily as a result of undue delays by the Department of Energy (DOE) in undertaking Integrated Energy Planning (IEP) and Integrated Resource Planning (IRP). Such undue delay undermines the work of government as a whole and the prospects for realisation of the basic rights of all citizens, including access to basic services, an environment not harmful to human health and food security.

The most immediate and specific target of this complaint is a decision on the part of DEA, communicated to the National Climate Change Committee (NCCC) on 28 July 2016, to further delay consideration of mitigation over the medium term (beyond 2020) and to make such consideration secondary and conditional to finalisation of an IRP; *Furthermore*, that the IMCCC continues to allow the implementation and elaboration of climate change mitigation policy to be repeatedly deferred and unduly obstructed, inter alia by lack of implementation by the DOE. Also subject of this complaint is an apparent decision to abandon the development of Medium- and Long-term Desired Emission Reduction Outcomes (DEROs to 2030 and 2050 respectively) and instead to address mitigation only incrementally, in 5-year cycles, as described in the document 'DEROs Explanatory note 4', dated March 2016 and made available to stakeholders on 4 August 2016.

URGENCY: The objective of this complaint is primarily to avert further maladministration and the immediate and increasing risk of inappropriate and wasteful public expenditure (through commitments anticipated over the coming six to ten months, most particularly in the energy sector), which is highly likely in the on-gong absence of an inclusive assessment of the full extent of national mitigation potential over coming decades *and* identification of the outcomes appropriate to realisation of the global goal of keeping global warming well below 2°C.

Background and history of the complaint

The prospects for and potential costs and benefits of medium- and long-term mitigation in South Africa have long been an issue of contestation, as was recognised in the Climate Change Response Strategy adopted in 2004. The need and rationale for setting out medium- and long-term mitigation objectives was further articulated by the Long Term Mitigation Scenarios process and its findings adopted by Cabinet in October 2008. Government commitment to setting out medium- and long-term mitigation objectives was formalised in the National Climate Change Response White Paper (NCCRWP) adopted by Cabinet in October 2011, inter alia in section 6.1.2 (page 25): “Defining desired emission reduction outcomes for each sector and sub-sector of the economy within two years of the publication of this policy-based on an in-depth assessment of the mitigation potential, best available mitigation options, science, evidence and a full assessment of the costs and benefits.”

Following adoption of the White Paper, the DEA commissioned the Mitigation Potential Analysis (MPA), initially intended to fit within the 2-year timeframe, though it was soon apparent that this would be extended. During deliberation of the terms of reference for the MPA it was decided that the study would not determine or propose mitigation outcomes (nor the total extent of mitigation potential), but rather focus on socio-economic assessment of a well-defined set of “abatement opportunities” through modelling and macro-economic analysis. The determination of DEROs was set to follow Cabinet-level approval of the Report of the MPA, which was first scheduled for mid-2013, later postponed to mid-2014. The main research findings were tabled in 2013 and the subject of extensive stakeholder deliberations before being tabled for high-level clearance early in 2014.

Also tabled in 2013, by the DOE, was the ‘2012 IEP Draft Report’, the first public output of the Integrated Energy Planning process initiated in 2011, with a commitment to conclude the IEP process in the first half of 2014 and thereafter a new Integrated Resource Plan (IRP) for the electricity supply industry. Several written stakeholder submissions in January 2014 contended that the IEP process was failing to sufficiently take account of the NCCRWP and that the scope of planning should be expanded to consider an energy development pathway with a far lower emissions profile. Comment calling for planning for deeper emissions reductions was also submitted in response to a draft IRP Update Report (2013) published for comment by DoE.

In June 2014 the DEA issued a briefing document: ‘Development of Desired Emission Reduction Outcomes (DEROs) and Mix of Measures for Sectors and Subsectors of the Economy’, which served to reiterate the policy mandate (Section 4.1): “The DEROs will consist of three successively nested frameworks for the long-, medium- and short-term (by 2050, by 2030, and from 2016 to 2020 respectively), ... long-term DEROs have two primary functions: the first is to prevent the technology lock-in characteristic of high emission pathways (e.g. investment in new high-carbon technology that would make it much more difficult and expensive to implement future climate policies); the second is to allow decision-makers to cultivate an appropriate range of future mitigation options, both in terms of technology development, and also through measures taken by key institutions.”

In September 2014 the DEA issued ‘DEROS Explanatory Note No. 2 - Development of Mix of Measures for Sectors and Subsectors of the Economy’, which further highlighted the relevance of medium-term mitigation ambition in Section 2.3 (page 4): “Measures associated with medium-term DEROs take into consideration that the 2030 horizon falls well within the investment horizon for current infrastructure investments, and so mitigation goals for 2030 have a direct policy outcome.”

The Report of the MPA was published in November 2014, at a National Climate Change Dialogue convened under the auspices of the IMCCC. In a DEA presentation a process was sketched out for the elaboration of ‘DEROs and MoMs’ that would dovetail with the development of South Africa’s position for negotiations under the UN Framework Convention on Climate Change (UNFCCC) due to culminate in an agreement at

‘COP21’ – the Conference of the Parties in December 2015. Further work, building on the MPA, was commissioned by the DEA to develop or inform a methodology for the determination of DEROs. A draft DEROs Methodology paper was the subject of stakeholder consultations in early 2015, including a workshop in February at which private sector stakeholders rejected the methodology and the way forward proposed by DEA. Subsequently it was communicated by DEA that priority would be given to deliberation of international positioning, as UNFCCC negotiations required the tabling of “Intended Nationally Determined Contributions” (INDCs) by September, as input to the agreement anticipated at COP21.

South Africa’s INDCs were required to include quantified mitigation intentions to 2030 and the Draft INDCs related to mitigation focused on what could be considered as a national fair share of the global response and reiterated the emissions range set out in the NCCRP, known as the Peak, Plateau and Decline or ‘PPD Range’. Several stakeholder submissions argued that the PPD Range and the aggregate mitigation INDC to 2030 were not consistent with national or multilateral objectives, or an appropriate medium-term desirable outcome, and should be revised downwards. It was also noted that the national mitigation *outcome* – the total mitigation required within the South African economy - should not be confused with a ‘national fair share’ of mitigation effort within an equitable multilateral system, i.e. commitments commensurate with national responsibility and capabilities.

The Paris Agreement adopted at COP21 incorporates South Africa’s INDC on mitigation, which stipulates that it will result in emissions between 398 Mt and 614 Mt for the periods 2021 – 2025 and 2026 – 2030, as per the PPD Range in the 2011 NCCRP. This range is too wide to provide guidance to energy investment planning or to provide a meaningful indication of national intentions. International analysis of national commitments in the Paris Agreement indicates that South Africa’s INDCs is consistent with the aggregate level of mitigation ambition and that this is insufficient to meet the global goal and would result in global warming of around 3°C.

At an NCCC meeting in March 2016 the DEA indicated that work on short-, medium- and long-term DEROs was on-going, that a ‘MPA Update 2016-17’ had been initiated that would provide a more inclusive analysis of mitigation potential and consider ambitious medium- and long-term outcomes, and that a DEROs methodology paper would shortly be released to stakeholders. Civil society stakeholders again argued that South Africa’s UNFCCC ‘contribution’ on mitigation is not consistent with the global goal (this has not been contested by DEA) and would not constitute a desirable emissions reduction outcome for South Africa. It was further suggested that the net national emissions outcome should be below 350 Mt in 2030.

At an NCCC meeting in July 2016 the DEA indicated that work on short-term DEROs was on-going, while work on the ‘MPA Update 2016-17’ and thus on medium- and long-term mitigation prospects and ambition had been put on hold until “finalisation of the IRP”. The methodology paper released to stakeholders in August - ‘DEROs Explanatory Note No. 4’ (March 2016) – is almost exclusively concerned with mitigation ambition to the end of 2020, but does suggest that medium- and long-term DEROs to 2030 and 2050, as provided for in the NCCRP, have been abandoned: “DEROs will be defined for the short, medium and long term, on a five-year cycle, allowing for flexibility in the development of the overall mitigation system, national and sectoral policy, and the incorporation of updated information on emissions, technology opportunities and costs and other relevant information.”

The only further mention of mitigation beyond 2020 in the Explanatory Note is: “Over the intervening five-year period to 2020, the reporting, monitoring and evaluation systems will be implemented, the MPA will be updated and the coverage and extent of the DEROs will be extended to cover all time periods accordingly.” This open-ended delay (and arguably active avoidance) of the deliberation of medium-term mitigation outcomes is considered to constitute maladministration.

Reasons the complaint should be investigated by the Public Protector:

Failure to implement climate change policy in a timely manner means that South Africa's national development planning is being denied necessary guidance regarding emissions objectives. This exposes the economy and financial institutions, including pension funds, to unnecessary and unacceptable risk. Most particularly this risks greatly increasing the total economic cost of energy supply into the future, both through perpetuating the externalisation of many real costs and the likely stranding of assets (such as infrastructure for fossil fuels). It is also likely to cause the loss of localisation and employment growth opportunities in clean energy industries and to increase the costs of adaptation to the impacts of climate change. Thus the lack of clear mitigation objectives compromises the Constitutional rights of the majority of South Africans, including rights to adequate potable water, food security and an environment not harmful to human health.

Decisions are imminent regarding massive public procurement and long-term infrastructure financing and are currently being informed by outdated plans, such as the IRP2010 and the South African Coal Road Map, that are incompatible with our over-all climate change response objectives and related international commitments. Whether the cause is a refusal or inability at the level of Directors General to consider any substantial deviation from business-as-usual, or stone-walling in behind-the-scenes engagement between business and government, or bureaucratic issues around lack of clarification of responsibilities or mandate, the effect is an unacceptable barrier to sustainable development that could and urgently should be removed by the Inter-Ministerial Committee on Climate Change (IMCCC).

Civil society stakeholders have consistently advocated and engaged all available government processes to encourage and facilitate the deliberation of medium- and long-term mitigation objectives as a matter of urgency and national import, as described below. Following the signing of the Paris Agreement by the Minister of Environmental Affairs on 22 April 2016, an open letter to the Minister, as Chair of the IMCCC, requesting details of the Update of the Mitigation Potential Analysis and opportunity for stakeholder deliberation of "the question of the most desirable emissions trajectory or appropriate mitigation ambition for South Africa", was published in the Business Day and delivered to the Ministry. To date no response has been received by the Alternative Information and Development Centre (AIDC), the NGO that issued and sent the letter in the first week of May.

A complaint lodged with the Public Protector by Project 90 by 2030 in April 2015, regarding the lack of communication of the progress of energy planning by the Department of Energy (DOE), most specifically the lack of response to various letters to the Ministry and Director General regarding IRP and IEP, led to undertakings by the DoE – as communicated in a letter from the Protector's office in April 2016 – that to date have not been fulfilled. (A media report of a statement by the Minister of Energy in July indicates the latest intention is to table a draft IRP Final Report by the end of 2016 for consideration by Cabinet.) This highlights the folly or maladministration of allowing the transparent deliberation of the medium-term emissions outcome required of the entire economy to be further delayed in deference to promulgation of an IRP for electricity supply, as well as the urgency for recommending remedial action.

The steps taken to solve the problem:

Steps taken by one or more of the organisations on whose behalf the complaint is made have included a range of activities, from direct engagement with government officials and processes and correspondence with Ministries, to engagement with other stakeholders, publishing research and public advocacy. Complaints specifically regarding undue delay to the setting of DEROs began, through the appropriate national stakeholder body, when the initial two-year milestone of the NCCRWP (2011) was reached in October 2013. Key subsequent interventions are detailed below.

The problem was articulated during the development of the White Paper as an immediate need for ‘carbon budgeting’, which was also recognised in the 2011 draft of the National Development Plan, which notes: “The carbon budgeting approach to mitigation must efficiently and appropriately apportion carbon space to the sectors and activities that add the greatest value, using a transparent set of criteria and indicators that include developmental criteria.” It is the implementation of this approach that offers the solution and failure to do so that constitutes maladministration. The most recent policy document compounds the problem by indicating an intention not to implement the provisions of the NCCRWP regarding 2030 and 2050 mitigation objectives.

The issue of medium-term mitigation objectives or DEROs has been engaged by civil society stakeholders throughout the policy development process, as well as deliberations of positioning within international negotiations. Following adoption of the NCCRWP in 2011 this included: participation in the technical working group for the Mitigation Potential Analysis; engagement with the nascent DEROs process and subsequent deliberations at the National Climate Change Committee (NCCC); submissions regarding the Drafts INDCs to the UNFCCC in 2015; inputs to two meetings of the NCCC in 2016 and the issuing of an open letter to the IMCCC at the beginning of May 2016.

A civil society Review of Implementation of the NCCRWP was undertaken in 2014 by the Electricity Governance Initiative (draft findings were provided to the DEA for comment) and published by Project 90 by 2030 at the National Climate Change Dialogue convened by government in November 2014. The problem was articulated as follows, in the section Big-picture Findings regarding Implementation of NCCRWP in the area of mitigation: “The NCCRWP objectives and deliverables are not being integrated into or supported through over-arching government planning and strategies... A great deal rests on the ‘DEROs process’... not just in terms of the scope of mitigation and the ambition to be deemed desirable, but as the primary and currently the only platform for accommodating ... the national commitment to low-carbon and inclusive development.”

The problem or issue has also been taken up through related government processes, most particularly consultations of the National Planning Commission and drafting of the National Development Plan and processes of the DoE regarding IEP and IRP. The issue was addressed in a Draft IRP2010 Update Report, published for comment by DoE in 2013, in parallel with the IEP process, and the problem was articulated in stakeholder comments to both processes. The Draft Update Report was subsequently withdrawn and the issue of including scenarios consistent with climate change policy was taken up in correspondence with the DOE, which was ignored, as documented in the complaint to the Public Protector of April 2015, as noted above.

Part of the problem is the sequencing of planning processes and decision-making, as highlighted by the most recent relevant process of the DEA (the Update of the MPA) being held hostage to the IRP process of the DoE, despite government itself recognising that electricity supply planning must be guided by climate change response strategy. For this reason civil society organisations motivated, from adoption of the White Paper, that stakeholder deliberation of medium- and long-term DEROs should take place in parallel with the bottom-up Mitigation Potential Analysis process. This is reflected in a 2012 document motivating carbon budgeting that was submitted to the NCCC by the South African Climate Action Network (SACAN).

A wide range of civil society organisations have been involved in diverse efforts to advance implementation of climate change response, including the setting of ambitious medium-term mitigation objectives. Some of these efforts have been coordinated through the SACAN, and the ‘Energy Governance SA’ network, while various efforts by community-based organisations and climate justice activists receive little recognition, but bear testimony to the extent of stakeholders facing the negative consequences of failing to address the problem.

The most recent and public attempt to address the problem was an open letter of 4 May 2016 sent by the Alternative Information and Development Centre (AIDC) to Minister Molewa, as Chair of the IMCCC, which was received by the Minister's office and published in the Business Day (on-line and in print), that specifically called for urgent stakeholder deliberation of "the question of the most desirable emissions trajectory or appropriate mitigation ambition for South Africa".

Conclusion:

In the circumstances, we call upon the Public Protector to exercise her powers to investigate this conduct in terms of section 182 of the Constitution of the Republic of South Africa, as well as section 6 of the Public Protector Act 23 of 1994.

The conduct in question is the failure of the Inter-Ministerial Committee on Climate Change to ensure the implementation the 2011 White Paper provisions for the elaboration of climate change mitigation policy, as required for input to Integrated Energy Planning (as provided for in the Energy Act 2008) and Integrated Resource Planning, while the Department of Energy is proceeding with major procurement and investment in the absence of a low-carbon energy strategy, any plans developed in the last six years, or any active government process to consider emissions reductions required beyond 2020.



.....Signature:

Date: ...24 August 2016...

ATTACHMENTS:

Government documentation:

The National Climate Change Response White Paper (NCCRWP) of 2011;

DEA: DEROs Explanatory Note No. 4 (March 2016);

DEA: Update on the Implementation of the National Climate Change Response Policy – Section on mitigation of Presentation to the National Climate Change Committee (NCCC) on 28 July 2016

DEA: 'Development of Desired Emission Reduction Outcomes (DEROs) and Mix of Measures for Sectors and Subsectors of the Economy' (June 2014);

Documentation of some of the NGO efforts to address the problem:

SACAN Carbon budgeting workstream motivation to DEROs process (November 2012);

'DEROs & CBs and the PPD Range and carbon tax' - Submission to the DEROs process by R Worthington (civil society member of Technical Working Group), 31 October 2013;

Electricity Governance Initiative in South Africa (November 2014): Report on a Review of Implementation of South Africa's National Climate Change Response White Paper (NCCRWP)

EGSA letter to DoE DG 9 November 2015, requesting progress re IEP & IRP;

AIDC Open letter to Inter-Ministerial Committee on Climate Change – sent to Minister Molewa 10 May 2016; Published in Business Day 4 May 2016;

Additional documentation, including detailed correspondence with DEA, is available on request.

Thank you for filling in the form. We will respond as soon as possible.