

You are invited to submit comments on the Presidential Commission’s Framework for a Just Transition. Please direct your comments in writing to the PCC Secretariat at info@climatecommission.org.za before Friday, 29 April 2022.

Name:	DSI/NRF SARChI Research Chair in the Sociology of Land, Environment and Sustainable Development: Prof CJ Walker (Research Chair) and Dr BJ Malope (Postdoctoral Fellow)
Tel:	021 808 2420
Email:	bjmalope@sun.ac.za ; cjwalker@sun.ac.za
Address:	Dept of Sociology and Social Anthropology, Stellenbosch University

1. General comments

1.1 We endorse the urgent need for an energy transition that is just. The three principles the draft Framework sets out (p8) are of crucial importance. As a high-level, aspirational document the draft document sets the scene by addressing the energy transition across four critical sectors of the economy: coal (electricity), automobile, agricultural and tourism. The Framework usefully plots where the country should be headed in terms of goals and targets in each of these sectors. However it needs a broader geographical reach and certain key issues are neglected.

1.2 The stated purpose and scope of the Framework is to “redesign the economy to the benefit of most citizens ... managing the social consequences and economic upside of those policies” (2022:6). This requires prior understanding of the social and economic contexts within which these consequences will play out, based on empirical research. The development of the Framework would benefit from further engagement with ongoing empirical research which addresses the following questions:

- Who are the people that need empowering and are likely to be left behind?
- Where are they located?
- What are the specific conditions that need to be fostered for empowerment and social inclusion to be advanced?
- How can the transition to a low-carbon energy dispensation be connected to South Africa’s triple challenges in different regions? (See p6.)

2. Need to recognise “host” communities for renewable energy projects

2.1 Research on the ‘just transition’ conducted by this Chair has focused on the electricity sector and how the Integrated Resource Plan (IRP) and mitigation policies advanced by the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) is playing out in particular contexts. In the electricity sector the strategic issues to consider in assessing the social and economic consequences of policies geared towards climate mitigation and/or adaptation have regional dimensions which need to be spelled out far more clearly in the Framework.

2.2 The need for the energy transition from fossil fuels to be just goes beyond the provincial boundaries of Mpumalanga and extends to the “host” communities for renewable energy projects throughout the country, including those in politically and economically marginalised rural towns in the Northern Cape, Eastern Cape and Western Cape. Local host communities of renewable energy projects should thus also be considered as an “at-risk” group (p9-12), albeit with different concerns from those in the coal value chain.

2.3 In respect of the Northern Cape, a province with more than half of the projects across the REIPPPP 5 bid windows, a growing body of empirical research shows that the significant socio-economic needs of local communities hosting large-scale development projects are receiving very limited and often misdirected attention. (On astronomy see Butler, 2018; Gastrow and Oppelt, 2019; Terblanche, 2020; Walker and Chinigò, 2018; on renewable energy see Malope, 2022.) At times it appears that there is a presumption that the “just transition” is being advanced in these areas simply by virtue of renewable energy projects being located near these communities and running small ad hoc community-development projects on the side, in order to tick their REIPPPP requirements. Ultimately, the REIPPPP programme fits the quintessential “development from above” model, with very limited opportunity for meaningful community participation. This limitation needs to be addressed.

3. Planning Elements in the draft Framework

3.1 The Five Planning Elements offer the scaffolding for the just transition framework and their application can be seen to be relevant at different scales: national, regional (or provincial) and local. The first element, *Active Labour Markets and Human Resource Development*, clearly deals with the quality of labour supply and employment opportunities. This element would benefit from more specific developmental goals and targets in the affected markets with the “at-risk” groups being the primary point of reference.

3.2 The second element, *Social Protection Measures*, deals with the household and social reproduction. We concur that the household is a critical site for interventions aimed at poverty eradication. (On this see Malope (2022) in the context of the development of two wind farms outside the town of Loeriesfontein in the Northern Cape.) Missing in the Framework is a serious engagement with the reality of acute energy poverty at the household level, including in communities that are seeing major investment in renewable energy infrastructure in their backyards from which they are not benefiting. Here it is also important to note that energy poverty is not necessarily or only about accessibility to the grid but also about the affordability of electricity.

3.3 The third element, *Industrial Development, Economic Diversification, and Innovation*, speaks directly to the concerns of “at-risk” groups. The implementation plan for this element should both inform and be informed by regional development plans and sectoral labour plans, and promote the principle of sustainable livelihoods. What is important to recognise is that these plans will need to be revisited as they are implemented and unexpected opportunities and challenges emerge.

3.4 The fourth element, *Governance*, is extremely important. This section speaks directly to the Intergovernmental Relations Framework Act of 2005, which in the Climate Change Bill (2021) is seen to provide the framework for Provincial Forums on Climate Change. However, it is not clear how and if the District Development Model fits in the equation. Using a case study of the ZF Mgcawu District Development Coordinating Forum in the Northern Cape Province, Davies (2021) shows how the design and the implementation of the REIPPPP created unintended consequences, tensions, and contradictions. Malope (2022) found similar problems with unintended consequences, tensions, and contradictions in the way in which the REIPPPP has unfolded in the Hantam Local Municipality. What is clear from empirical

research coming from the Northern Cape is that effective implementation of large-scale projects that benefit host communities requires a level of effective local government that is not in place and needs to be built. One problem that needs attention is the 50-kilometre rule for identifying communities to benefit from the REIPPPP's requirements for local economic development. In the Northern Cape this creates problems within local municipalities which are very large and generally contain more than one small town, not all of which are within 50 kilometres of the IPP project.

4. The REIPPPP: 'job years' and community trusts

4.1 Job creation is a planning element that cuts across all sectors and in the REIPPPP the concept of "job-years" should be abandoned as it is misleading and unproductive. A job year is defined as one person working for one year on a fulltime equivalent basis; if that person works for two years that gets counted as two job-years when in actuality only one person is employed.

4.2 The community trusts that are provided for in the REIPPPP will accrue significant sums of money once their loans are paid off. It is imperative that strong institutions and an effective system of checks and balances be put in place to ensure that these trusts realise their potential for promoting community development and bringing about structural change. At a minimum the trustees must be appointed through a process that is as transparent as possible, mechanisms must be in place to hold them to account and the financial statements of these trusts must be available to all community members.

4.3 Poverty eradication programmes ought to be channelled towards empowering households directly in addition to the current model of development projects targeting specific sectors such as education and healthcare. Here the payment of direct cash transfers to local households from community trust funds has been identified as having potential (Malope, 2022) and this should be investigated through further research and consultation.

References

- Butler, S. 2018. Knowledge Relativity: Carnarvon residents' and SKA personnel's conceptions of the SKA's scientific and development endeavours. MA thesis: Stellenbosch University.
- Davids, S. 2021. Contested Land: A Case Study of Land Reform on the Municipal Commonage in Loeriesfontein, Northern Cape Province. MA thesis: Stellenbosch University.
- Davies, M. 2021. South Africa's contested transition to energy democracy: Lessons and Struggles from the Renewable Energy Independent Power Producer Procurement Programme. PhD Thesis: Stellenbosch University.
- Gastrow, M and Oppelt, T. 2019. The Square Kilometre Array and local development mandates in the Karoo. *Journal of Southern African Studies*, 45(4): 711-728.
- Terblanche, R. 2020. *Ongediertes*: A critical qualitative study of farmer–black-backed jackal conflict and its management around the Square Kilometre Array core site in the Northern Cape, South Africa. PhD thesis: Stellenbosch University.
- Walker, C and Chinigò, D. 2018. Disassembling the Square Kilometre Array: astronomy and development in South Africa. *Third World Quarterly*, 39(10): 1979-1997.