

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

Central Circle, Fish Hoek 7975

Web: <https://www.fhvrra.org.za/> Facebook: www.facebook.com/FHVRRRA/

Heritage Western Cape: Conservation Body

TO: PARLIAMENT: climatechangebill2022@parliament.gov.za
DEPARTMENT OF FORESTRY, FISHERIES AND THE ENVIRONMENT
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SUBJECT: COMMENTS ON THE CLIMATE CHANGE BILL [B9 – 2022] ¹

DUE: 27 MAY 2022

In terms of Section 29. (2) (a) on Public Participation and as one of the local communities mentioned in Section 18. (4) (e) which happens to live in an area threatened by a rising sea level due to rising global temperatures, we, the Fish Hoek Valley Ratepayers and Residents Association (FHVRRRA), agree that the bill has admirable Overview and Preamble goals of a climate-resilient, low-carbon economy, but some practicalities need some circumspection.

It is the measures that might be taken when Section 21. (2) (a)..."national greenhouse gas emissions reduction objective"[s] are not met that concern us.

We agree that mitigation will depend upon "technological advances" in Sections 18. (3) (b), 19. (c) (ii), 21. (4) (b) (ii), 22. (7) (b) and 23. (5) (b). The alternative to heat generating, pollutants spewing, internal combustion engine (ICE) vehicles is currently electrical vehicles (EVs). EVs are more expensive than equivalent ICEs, which is a huge negative "socio-economic impact" mentioned in the Preamble, Sections 12. (2) (b), 18. (4) (a), 22. (5) (a) and 24. (2) (a). The current range of EVs is about 400 kms. If travelling further than 400 kms, one must spend additional funds for overnight accommodation assuming that one can apply (matching connectors) an electrical charge to their vehicle for eight to 11 hours without a load shedding event. So, Eskom needs to be fixed and charging infrastructure must be installed along all national highways before punitive carbon tax is applied to ICE vehicles. Thus, we urge a "cautious approach" as mentioned in 3 (g) of the Overview before invoking (j) "the costs of responding to the adverse impacts of climate change and of mitigation which must be paid for by those responsible for causing the adverse impact" when no viable alternative transportation is available.

What is possible for South Africa is the production of alternative energy fuels, including green hydrogen. Methanol, Ethanol and Biodiesel can be produced without the use of petroleum products using sustainable feedstock. This should be incentivised. For instance, Methane generated from landfill sites need to be captured and converted into methanol.

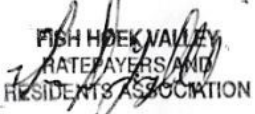
We support that Section 23. (4) (b) must be based on the availability of feasible mitigation technology and Section 25's phasing out of synthetic greenhouse gases.

¹ <https://www.gov.za/documents/climate-change-bill-b9-2022-18-feb-2022-0000>

SUMMARY

In conclusion, the FHVRRA recommends:

- non-load-shedding events, charging infrastructure must be installed along all national highways before punitive carbon tax is applied to internal combustion engine vehicles (personal carbon budget); and
- incentivise the production of alternative energy fuels.

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