

NFSD COMMENTS RESPONSE REPORT

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
1. Chamber of Mines SA	<p>“Remove / amend text on self-reliance with regard to energy and food production. In favour of a more integrated (global) development path.”</p> <p>“Replace word ‘un-recycled’ with ‘un-recyclable’.”</p> <p>“Clear articulation of the impact of crime in social trends and its influence on the fabric of society is required.”</p> <p>“Highlight indirect contribution of mining to economic growth.”</p> <p>“Efforts aimed at internalising costs should be reasonable, equitable and relevant & also take into account the development stage of SA.”</p> <p>“Legislation to extend fiduciary duties to social & environmental issues not supported. In favour of the voluntary King Code on Corporate Governance.”</p> <p>“Recognise that a greater role can be played particularly by mining companies in SD responsibility programmes. Burden to be shared equally between greater nos. of companies than a few companies.”</p>	<p>Chapter 1: Context for Sustainable Development (SD)</p> <p>Par 4 page 27 bullet 3</p> <p>Chapter 2: Trends & Implications</p> <p>Para 5.3 p 31</p> <p>Para 7.4 p 43</p> <p>Para 9.5 p 58</p> <p>Para 9.5 p 58</p>	<p>Chapter 2: Trends & Implications Para 8.1 p58</p>	<p>Sustainable development does imply greater local autonomy. Not included as this comment requires amendment which is contrary to spirit of whole document & national vision on SD.</p> <p>Not amended - Framework does NOT refer to, or mean, un-recycled; un-recyclable is used in text already; amendment not necessary.</p> <p>Included</p> <p>No other sector is referred to; therefore no need to refer to mining.</p> <p>Noted – already included.</p> <p>The King approach is referred to (para 12.1), and no extra legislation is recommended</p> <p>Noted – not included as this goes beyond scope of high level strategic document such as Framework</p>

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	<p>“Recognition that a few companies have the capacity to measure sustainability impacts and monitor them, however smaller companies are lagging behind.”</p> <p>Preference on the implementation and capacity building on implementation of already existing strategies & policies over the development of new ones. Capacity bldg to refer to all stakeholders not just government</p> <p>Removal of Annex 1- too detailed. Specifics to be dealt with in the future action plan</p> <p>The proposal to create a Sustainable Resource Use Cluster in Cabinet not supported. Need to ensure that SD in considered in all the existing Cabinet clusters Also Commission for SD not favoured. Agree that Presidency be champion of NSSD than DEAT</p> <p>Reduction of quantity of unusable waste outputs to zero over-ambitious therefore not supported. H/w focus should be on the proper mgt of waste in which minimisation of waste plays a critical role</p> <p>Phasing in on the promotion of sustainable infrastructure to take into account that infrastructure investment are desperately needed in the next 5yrs to achieve growth targets</p>	<p>Para 10 p 63</p> <p>Chapter 3: Priority Areas</p> <p>Para 13.1 p.73</p> <p>Priority 1</p> <p>Priority 2</p> <p>Priority 3</p>	<p>Chapter 3: Priority Areas Para 12.1 p77 Para 12.2 p80</p> <p>Chapter 4 Making it Happen Para 16.2 p103</p> <p>Chapter 3: Priority Areas Para 13.1.1 p85 bullet 1</p> <p>Chapter 3: Priority Areas Para 13.1.2 p87 bullet 3</p>	<p>Noted – not included as this goes beyond scope of high level strategic document such as Framework</p> <p>Implementation of strategies is covered under next section (i.e. 12 Performance to date) and covers highlights & achievements to date (12.1), as well as gaps, challenges & constraints (12.2).</p> <p>Deleted as this will be developed further in Phase 2; include description of work done to date in Ch 4 in which reference is made to Annex 1 & 3. Annexes deleted; Para on “Appendices” in Executive Summary deleted; & new para 17.2 inserted in chapter 4)</p> <p>Reference to SD structures more generic. Amendment included</p> <p>The word ‘unusable’ has been deleted, but the long-term aim of zero waste retained because this is a national policy goal as articulated in the Polokwane Declaration</p> <p>Comment – captured in document already.</p>

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	<p>Remove e.g. that may cause alarm and impact negatively on other sectors such as ‘...encourage building systems that minimise the use of cement...’ and ‘coupling investment in coal-fired generation to investments in clean-coal technologies”</p> <p>Priority area is too wide; restrict it to ‘cross-cutting issues’. Identify mechanisms to deal with such issues. HIV/AIDS already dealt with under creating sustainable human settlements, remove from this section</p> <p>Framework doc to be seen as the NSSD, to avoid future development of another strategic doc.</p> <p>More explanation on statements like “leveraging financial support from the private sector. This could involve the forming of a social contract.”</p>	<p>Priority 5</p> <p>Chapter 4: Making it Happen</p>		<p>Disagree - examples will not cause alarm & document specifically included examples of technologies that are cleaner and are being considered/implemented - these sectors already say that this is necessary for climate change reasons – just a matter of covering cost and technology options</p> <p>Cannot change as this would not be reflective of the reality that these are the major issues that government currently has to deal with & they are cross-cutting. Deleting any of these issues here would undermine their importance. No harm in repetition – no changes included</p> <p>The relationship between Framework & NSSD is dealt with at length in chapter 4. DEAT has already made policy decision that this should be a Framework; rationale for this is also explained in chapter 4.</p> <p>Not included</p>

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	Remove summary of strategic intervention- too specific for this doc. Sufficient examples exist in the main body. Intervention in Annex 1 to be considered in the future action plan	Annex 1	Chapter 4 Making it Happen Para 16.2 p103	Delete as this will be developed further in Phase 2; include description of work done to date in Chapter 4 in which reference is made to Annex 1 & 3. Annexes deleted; Para on "Appendices" in Executive Summary deleted; & new para 17.2 inserted in chapter 4.
2. UNISA	Impressive document- well done!!	Overall doc		Noted
3. NEDBANK	<p>Very good and comprehensive doc, h/w consider the following:</p> <ul style="list-style-type: none"> ▪ Need for a viable strategy for the promotion of renewable energy in South Africa ▪ Comprehensive ecosystems protection, especially hugely threatened systems such as freshwater & grasslands ▪ Better cooperation by other government departments with DEAT in implementation and monitoring of progress 	Overall doc	<p>Chapter 3 Priority areas Para 13.1.2 p87</p> <p>Chapter 3 Priority areas Para 12.2 p81</p>	<p>Noted</p> <p>Included</p> <p>Dealt with under SANBI & S Brownlee comments. No need for changes</p> <p>Already covered under integration section.</p>
4. STANDARD BANK	Support for the annual reporting of financial services on the charter progress for assessments and be publicised	Page 60		To show contribution the targets would need first to be brought in line with NFSD. Besides NFSD is not intended to advertise financial services sectors own agenda's. No need for changes

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	<p>W.r.t. utilisation of indicators to measure SD, it would be important to look at current indicators used globally (the Global Reporting Initiative) to ensure comparability. H/w needs to have ones more suited to local conditions. Also consider similar initiatives with the NEPAD. Need to consider time-frames to implement the NFSD</p>		<p>Chapter 4 Making it Happen Para 16.1 p100</p>	<p>Included reference to JSE 's SRI under quick wins – refer chapter 4; section on Process – Phase 1</p>
<p>5. Mark Wells</p>	<p>Inclusion of the LCA and full cost accounting</p> <p>Full cost accounting of the impacts to the planet and its people for the goods and services traded in our economy is an important and necessary step in achieving a zero waste economy by 2022 as per the goals of the Polokwane Declaration.</p> <p>Full cost accounting also allows for informed consumer choice, where scanning a bar code can reveal the full social and environmental footprint associate with every product.</p> <p>Polluting and socially irresponsible businesses are the only ones who will benefit from the glaring omission of full cost accounting from the NFSD.</p>			<p>Reference to full cost accounting has been included</p> <p>Reference to full cost accounting has been included</p> <p>Reference to full cost accounting has been included</p> <p>Reference to full cost accounting has been included</p>
<p>6. City of Cape Town</p>	<p>Document is well written but too large and there is too much repetition. Use more subheadings and bullets</p>	<p>Section 6.1 on Renewable energy (RE)</p>		<p>Noted</p>

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	<p>Document states that there is insufficient info on renewable energy. Information IS available, but what is required is high level understanding of urgency and need to increase the share of RE and commit appropriate resources There should be a mandatory policy on renewable energy</p> <p>Financial disincentives that work against the reduction/ reuse/ recycling of waste need to be removed</p>	<p>Section 6.3 Waste</p>	<p>Chapter 3 Priority areas Para 13.1.2 p87</p>	<p>The need for a renewable energy policy has been strengthened</p> <p>Framework deals with the issue of Market Based Instruments generically & is not intended to deal with this issue specifically or in terms of specific sectors; in addition Treasury comment indicates that further research is required before any policy position or commitments can be made</p>
<p>7. DME</p>	<p>'Strategy to eliminate oil imports in the near future" not supported, instead should read, " Strategy to manage and reduce oil imports in the near future"</p> <p>"It may be time to develop a single integrated energy policy for SA". Such a policy already exists (White Paper on Energy Policy of '98). Sentence should instead read, "The white Paper on Energy Policy of 1998 must be updated as soon as possible"</p> <p>Carbon dioxide per capita GDP etc does not normalise to indigenous resources. It is inequitable to compare directly countries that are coal based and hydro based.</p> <p>Also need to mention that SA is signatory to the Kyoto Protocol</p>	<p>Item 6.1 on Energy</p> <p>Item 14</p> <p>Page 30</p> <p>Page 78</p>	<p>Chapter 2 Trends & Implications Para 6.1 p42</p> <p>Chapter 3 Priority areas Para 13.1.5 p91</p>	<p>Included - References in chapter 3 have been amended (see comment 19 below)</p> <p>Included – refer chapter 3; Rising energy prices</p> <p>Not included – runs against the national scientific consensus that we need to reduce our CO2 emissions</p> <p>Climate change - referred to elsewhere in the document thus not included again</p>

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	General: Much of the content in the document does not directly address environmental matters	Overall document		This is not an environmental agenda. This suggests a narrow and limited interpretation of environmental issues
8. DWAF	<p>Very comprehensive and fair representation of water-related issues</p> <p>982m3/ pa is a wrong figure and doesn't relate to consumption but water availability. Rather simply state that 'freshwater consumption is rising.'</p> <p>Incomplete text. To add information from NWRS table 2.6 in Chapter 2 which indicates that there is a potential for further development of water resources- by construction of additional storage to increase national yield by 5 410 million m3/a. (refer to the NWRS than to Bill Rowlston's presentation).</p> <p>The 82% of the threatened river ecosystems to refer only to main stem rivers rather than main river systems as a whole</p> <p>DWAF does not pay levy taxes as mentioned in the text</p>	<p>Overall document</p> <p>Page 20, 2nd bullet</p> <p>Page 33 Para 6.2</p> <p>Page 35 6.4</p> <p>P43</p>	<p>Chapter 1 Context for SD Para 2.1 p25</p> <p>Chapter 2 Trends & Implications Para 6.2 p42</p> <p>Chapter 2 Trends & Implications Para 6.5 p44</p> <p>Chapter 2 Trends & Implications Para 7.4 p52</p>	<p>Noted</p> <p>Deleted</p> <p>Included</p> <p>Correction included</p> <p>Correction included</p>

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	Use of the word 'rights' to be changed to 'entitlements'. Also change word 'dependant' to 'dependent' or 'depend on'	Page 70, 1 st bullet	Chapter 3 Priority areas Para 12.2 p82 bullet 1	Amended
9. Endangered Wildlife Trust	<p>Too much focus/ emphasis on economic prosperity in the vision and less/no guarantee on human well-being and happiness!</p> <p>Reference in ch 1 to the discarding of the previous model and the reasons needing more emphasis upfront in the document, this is a fundamental shift – the '3 pillars' and the need for trade-offs are still regularly trotted out by officials and policy makers</p> <p>What does an increasingly stable population size mean? Need to quantify and it needs to be a hard target. Same comment in respect of water consumption rates and soil depletion rates</p> <p>"Government has also responded to the MDG targets of reversing the loss of environmental resources" - How exactly has govt 'responded'? What has been achieved in this regard? ALL environmental Indicators are still negative</p> <p>"Too much emphasis on strategy with little results, much more need to be made of what needs to be done."</p>	<p>P24 1st bullet</p> <p>P26 1st bullet</p> <p>Para 11.2, p 65</p> <p>Para 11.2 p 66</p>	<p>Chapter 1 Context for SD Para 2 & 2.1 p21 & 23 respectively</p> <p>Chapter 1 Context for SD Para 4 p32</p>	<p>Noted</p> <p>This is dealt with up-front see para 2 which starts by setting scene & rationale for paradigm shift & then the description of the definition of SD in para 2.1 – can't be more up-front than that</p> <p>This is included in the section that deals with VISION & is thus intended as a 'visionary' state which will be indicative of having achieved SD; it is not intended as a specific target</p> <p>Para 12 deals with implementation – this only identifies what strategies & plans have been put in place to meet international goals & targets.</p> <p>This is dealt with in Para 12; no further amendments made as this is a frame-work and not comprehensive state of environment or sustainable development report</p>

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	<p>“Disagree that ASGISA advances sustainable development agenda (very dangerous to take politically accepted expediency of suggesting so).”</p> <p>“Provide quantitative data on progress made in addressing sustainable development goals and meeting targets re protecting bio-diversity and sustaining eco-systems and natural resources.”</p> <p>“What about continuing degradation or loss of natural resource, this is a major challenge which needs to be reversed.”</p> <p>“Why is the key issue and challenge (regulating and guiding human behaviour) not included in the list above?”</p> <p>“It is important to emphasise here that these changes are non-negotiable, they must be implemented if SA is to shift onto a sustainable development footing.”</p> <p>Time frames required to emphasise urgency</p> <p>Bring out both positive and negative aspects of mining, only positives are highlighted</p>	<p>Para 11.2 p 66</p> <p>Para 12.1 p 66</p> <p>Para 12.2 p 69</p> <p>P 70 3rd para</p> <p>P 71 last para</p>	<p>Chapter 3 Priority areas Para 11.2 p77</p> <p>Chapter 3 Priority areas Para 12.2 p81 bullet 7</p>	<p>Reference to ASGISA amended</p> <p>This is a framework document and not intended as state of environment report, level of detail thus sufficient and illustrations are given of progress made in the subsequent paragraphs</p> <p>Inserted a bullet to address this gap</p> <p>The bulleted list refers to major gaps and challenges, whereas the need to regulate and guide human behaviour is identified as being the key issue and is seen as a cross-cutting aspect which relates to each and every one of those things that are identified in the bulleted list; no further amendment made</p> <p>This is Framework and not action plan – negotiation of targets and timeframes to achieve changes will be done in next phase</p> <p>Will be set in next phase – this is Framework not strategy/action plan</p> <p>Noted but amendment not deemed necessary</p>

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	<p>Key component of shifting to SD to heavily tax consumption of resources and not production. Also support the LCA and FCA to be incorporated into the NFSD</p> <p>No attention on the rehabilitation of already compromised ecosystems e.g. soils, water, etc</p>			<p>Reference to full cost accounting already included in document</p> <p>Noted but amendment not deemed necessary</p>
10. DPLG	<p>NFSD regarded as pivotal for sustainable development in the country.</p> <p>DPLG proposes that an internal working group be established to develop sub-implementation plan focusing on DPLG mandate as espoused in the NFSD. Group to work with Treasury on analysis and refinement of indicators against government wide indicators, to ensure provincial and local targets are set</p> <p>Implementation of NSSD to promote inclusivity of communities through ward committees, NGOS and Community Development Workers</p> <p>DEAT to make use of national, provincial and local planning opportunities to incorporate NSSD into sector master plans such as IDPs. The IDP Regulatory Review to be completed in April/May will take into account NFSD priorities and how these may be articulated through National Planning Framework.</p>	General	<p>General</p> <p>Chapter 4 Making it Happen Para 15 p97</p> <p>Chapter 4 Making it Happen Para 16.1 p101 - 102</p>	<p>Noted</p> <p>Action for DPLG thus not intended to include in NFSD</p> <p>Included – refer chapter 4; section on Institutional framework for implementation</p> <p>Included – refer chapter 4; section on Process – Phase 2</p>

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	<p>No focus on gender and development outside MDG 8 and it is significant that this focus (both men and women) be highlighted for positive impact of development.</p> <p>NSSD will require review of existing and proposed structures to coordinate and implement Action Plans. Recommendations will be required from DEAT w.r.t. capacity requirement of these structures</p> <p>Proposals for the conduct of IGR to be more prominent and IGR practices must be mainstreamed into intergovernmental activity to promote NSSD implementation</p> <p>DPLG encourages provinces and Districts Growth and Development Summits to factor the principles of NFSD into economic debates</p>		<p>Chapter 3 Priority areas Para 13.1.3 p89</p> <p>Chapter 4 Making it Happen Para 16.1 p102 bullet 5</p> <p>Chapter 4 Making it Happen Para 16.1 p102 bullet 3</p> <p>Chapter 4 Making it Happen Para 16.1 p102 bullet 1</p> <p>Chapter 4 Making it Happen Para 16.1 p101</p>	<p>Included – refer chapter 3; Economic development – developing skills & capacity; & chapter 4: section on Process – Phase 2 bullets under mobilising resources</p> <p>Included – refer & ch 4: section on Process – Phase 2 bullets under mobilising resources</p> <p>Included – refer ch 4; section on Process – Phase 2</p> <p>Included – refer ch 4; section on Process – Phase 2</p>
11. DEAT EC	<p>Emphasis on climate change is exaggerated and positioning it as the opening statement is inappropriate- there are more pressing and immediate issues to be mentioned.</p> <p>Clarity on how and why will the socio-economic impacts be most severe in the subsistence and small-scale fishing sectors</p>	Opening		<p>Disagree – if anything, it is understated</p> <p>Fish depletion means people in poverty who depend on fish will have less to eat. No changes included</p>

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	While the concentration of people into coastal environs does pose a threat to 'sustainability of resources in the coastal zone,' the statement is vague as it is not clear whether it refers to near-shore, off-shore or on-shore resources.			No changes included
12. ESKOM	<p>Document is still too long and this may restrict participation it seeks It would be useful to explain where the MDGs and the JPOI come from in the Executive Summary</p> <p>Footnote 2 quotes a confusing statistic, perhaps if the footnote is included to indicate the improvement in access to services, the footnote should be moved to before the comma. Also include statistics on electrification</p>	<p>General</p> <p>P. 9</p> <p>P.10</p>	<p>Chapter Trends & Implications Para 8.2 p58</p>	<p>Noted</p> <p>Included and already why needed in para 2.2 (p26)</p> <p>No changes made, not clear what the problem is</p>

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	<p>Also need to mention water in the depletion of natural resources section.</p> <p>Para talks about the need for civil society formation “to match and contest’ development in the private sector. Wording appears to encourage confrontational rather than partnerships approach and the role of civil society in ensuring public accountability should be applied to government performance as well.</p> <p>The wording ‘may be required to make commitments to reduce greenhouse gas emissions after 2012” should be reworded as it may be interpreted as absolute emissions reduction targets, which would conflict with SA’s negotiating position in international forums.</p> <p>The issue of information communication technologies not addressed, to be included under the ‘Globalisation” trend</p> <p>There is no mention of the need to promote research; development and implementation of clean coal technologies for electricity generation (also include this in p.38 last para, section 6.8 and p. 71 second bullet, section 12.2). There is no ref in the section to the role of coal supplying SA’s energy needs from a point of view of maintaining energy security.</p> <p>Only DEAT and DWAF legislations mentioned in this section. Also mention other relevant legislations from other Departments mentions as the bottom of p.65)</p>	<p>P.13</p> <p>Ch 2: Trends & implications P.30</p> <p>Section 5.3</p> <p>P.33 Section 6.1 para 2</p>		<p>Water already included under para 6.2 (p42)</p> <p>No changes required – the civil society sectors and government agree that civil society has a role in contesting policies – partnerships are already referred to</p> <p>The wording already indicates that this is a possibility (“may be required”) and does not state it as a specific commitment. No change needed</p> <p>Already included</p> <p>Clean coal technologies already included</p> <p>No changes included</p>
13. DST	Document currently too long and has numerous repetitions (Exec summary and main body)	General	General	Noted

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	Document outlines resource constraints facing the country but does not go into depth as to why and how behaviour can be changed. Lessons from other countries like Europe on waste management, congestion charges, strict town planning are not mentioned on how to achieve sustainable development goals.			Not purpose of document to go into lengthy explanations or spell out how to achieve/correct constraints. This is framework – strategy and action plans follow. Disagree – these issues are present
14. SANBI	Need to standardise the title ‘natural resources’ throughout the document to clarify focus of this area instead of different terms e.g. sometimes used as ‘sustaining our ecosystems and using resources sustainably’ and sometimes as ‘sustaining our ecosystems and using <u>natural</u> resources sustainably” ‘Priority areas’ in biodiversity sector refers to geographic priority areas , should be changed to ‘priority issues or priorities for strategic intervention’ to avoid confusion with geographic priority areas	Priority areas for strategic intervention	Chapter 3 Priority areas Para 13.1.2 p86 Chapter 3 Priority areas Para 13.1.2 p86	Amended No specific changes included – editing may pick this up Have inserted some text again (originally taken from Biodiversity Specialist Paper) into 13.1.2

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	<p>Addition to this paragraph to include: “ Maintaining the value of our ecosystems requires avoiding further loss and degradation of natural habitat in threatened ecosystems and critical biodiversity areas”</p> <p>Biodiversity-related indicators identified are relatively weak as they do not reflect the outright loss of natural habitat or levels of invasion by alien species (two of the major pressures on biodiversity and ecosystems functioning). Suggest an addition of indicators based on the National Spatial Biodiversity Assessment:</p> <ul style="list-style-type: none"> ▪ Proportion of ecosystems that are threatened, for terrestrial, river, estuarine and marine ecosystems ▪ Protection levels of ecosystems, for terrestrial, river, estuarine and marine ecosystems <p>Update of the NFSD indicators on biodiversity should be based on the indicators from the National Biodiversity Monitoring and reporting Framework once it is in place in April 2007</p>	<p>Value of our ecosystems</p> <p>P. 112</p>	<p>Chapter 3 Priority areas Para 12.1 p77 Para 13.1.2 p86 & 87</p>	<p>Included</p> <p>Reference to indicators removed with deletion of Annex 2</p> <p>Reference to indicators removed with deletion of Annex 2</p>
<p>15. Earthlife Africa Jhb</p>	<p>Commitments to the NFSD should be strengthened with establishment of targets for the use of renewable sources of energy.</p> <p>Also need to highlight the economic benefits of a transition to renewable energy sources</p>			<p>Not purpose of Framework; but have strengthened references to renewable/alternative energy – chapter 3 (see comment 7 above)</p> <p>Basically there already - No changes included</p>

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	<p>The reduction of the impacts of coal use through deployment of clean-coal technology and sequestration be driven by the application of environmental standards instead of state subsidies in fossil fuel</p> <p>Section to call for implementation of policy commitment to Integrated Energy Planning, incl. quantification & modelling of social costs and benefits. Also emphasize stakeholder participation.</p> <p>Consider that the most effective approach to reducing dependence on imported oil in short & medium term requires interventions to rapidly develop local industries in renewable energy technologies</p> <p>Examples to include small-scale biomass energy strategies focused on meeting local energy need and avoid revenue flowing out of communities. However, this should be supported by capacity building initiatives</p> <p>Need clarity on what is meant by a 'social contract' with the private sector</p> <p>Need clarity on the level of public participation with regards to genetically modified organisms</p>	<p>P.73 Enhancing systems for integrated planning & implementation</p> <p>Air quality & climate change</p> <p>Second Economy Interventions</p> <p>P. 87</p> <p>P. 93</p>	<p>Chapter 3 Priority areas Para 13.1.2 p87 bullet 4</p>	<p>No changes included</p> <p>Specific detail: sort of thing to be picked up in strategy and action plan phase.</p> <p>Have made changes to this effect basically says as much already</p> <p>Such examples already included – this is high level Framework document and not detailed action plan. No change needed.</p> <p>This is framework - i.e. high level doc not appropriate to spell out in more detail. Not included.</p> <p>Clarification of level of participation will differ according to sector and issue. This happens at the time – can't define in Framework document. No changes are required</p>

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	<p>Nuclear power not supported as an alternative to fossil fuels. Nuclear power does not share the sustainable characteristics of renewable energy technologies. Targets should also be set for wind and other technologies</p> <p>Need to be more explicit on the potential of renewable energy and energy efficient solutions in creating more jobs</p> <p>The following points to be included in the opportunities paragraph in biodiversity:</p> <ul style="list-style-type: none"> • More emphasis needs to be placed on low-input systems such as organic farming as it can contribute to the enhancement of sustainable production systems and agricultural biodiversity. Increased public attention and possible governmental regulation will in all probability result in an environment in which there will be a definite competitive advantage for businesses that devise novel ways of farming in a sustainable fashion. • The growing business of ecotourism has the potential to provide a means of generating local investment, thus incentivising ecosystem protection. It is of great importance that local communities derive a share of benefits from all ecotourism activities and any government endorsement or promotion of such activities should be conditional to this being covered contractually. 	<p>P. 94</p> <p>Critical cross-cutting trends: climate change</p> <p>Biodiversity Trends</p>		<p>No changes made</p> <p>Not purpose of Framework – this sort of thing needs to be dealt with in policy, strategy, sector master plan, etc</p> <p>This is already in the document – no changes made.</p> <p>This is already in the document – no changes made</p>

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	<ul style="list-style-type: none"> • Actions to conserve natural resources have a greater chance of success if local communities are given ownership of them, have a share in the benefits, and are involved in the decision-making process. • According to the Millennium Ecosystem Assessment the challenge of conservation in the twenty-first century is to move it outside of parks and other protected areas to become integrated into agricultural, marine, and urban systems. Accordingly, conservation outside of parks should open significant new business opportunities, for example cultural tourism. • Better protection of natural assets will require co-ordinated efforts across all sectors of governments, businesses, and international institutions. The productivity of ecosystems depends on policy choices on investment, trade, subsidy, taxation, and regulation, et cetera. 			<p>No changes required</p> <p>Agreed, no changes required</p> <p>Policy and planning coordination is included already</p>
16. Institute for Global Dialogue (IGD)	<p>The document should also acknowledge the negative aspects of globalisation in developing countries (the neoliberal policies) esp. issue of export-led growth which does not necessary translate to economic growth as it requires full employment and industrial strategy with a thriving domestic industry. (also consider impact on job losses, service provision, etc).</p>	<p>General doc</p>	<p>Chapter 2 Trends & Implications Para 5.4 p39</p>	<p>Text on trade & environment Inserted. Negative side is already included</p>

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	<p>Document fails to emphasise that consumption patterns are at the heart of energy crisis and also the impact of the promotion of international trade in goods & the immense use of energy to produce and transport goods. Thus, a shift in unsustainable production & consumption to go together with renewable energy options</p> <p>Needs to be more explicit on potential dangers of the dependency on mining, fishing, agriculture, etc on economic growth and natural resource base</p> <p>Principles to include 'appropriate and fair economic models' in the global economy Principle on equity- elaborate-equity for whom?</p> <p>Many policies referred to in the doc, however it should mention the need for policy reviews to assess impact on improving lives of poor and in implementing sustainable resource use</p> <p>Idea of a Resource Cluster not supported, require a mechanism and resources to support a central coordinating body such as the President's Coordinating Committee</p> <p>Need to mention other macro and micro-economic policies besides ASGISA and the impacts of those policies</p> <p>To revive suggestion made before on the Sustainable Development Institute to develop & support the NSSD.</p>	<p>P32: Natural Resource Trends</p> <p>P28: Principles</p> <p>Chapter 3: priority areas for strategic intervention</p> <p>Section on Economic Development</p>		<p>These issues are covered – no further changes made.</p> <p>It is there, but space is limited & as this is high level document its intention is not to deal with trends in detail.</p> <p>Concept of fairness is included in various principles; no changes made.</p> <p>No changes required</p> <p>No change required</p> <p>No changes – mostly covered</p> <p>Noted</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Need clarity on what is referred to as 'quick wins' when the strategy is long-term in nature</p> <p>Need for a political champion to encourage, oversee and monitor all levels of government</p>			<p>Disagree – this is clear</p> <p>No changes needed – there is a position on this (Presidency)</p>
17. City of Jo'burg	<p>Framework to start articulating the issue of institutional arrangements of implementing the NSSD, with firm recommendations in terms of institutionalising a coordinated decision-making and planning approach. Further clarification of the roles and responsibilities of the various sectors and the process for engagement at all spheres of govt.</p>			<p>Not appropriate to go into more detail than already covered in this document - Framework</p>
18. DeVilliers Brownlie Associates	<p><i>Additional biodiversity risks:</i> Biodiversity continues to be 'traded-off' for economic growth leading to irreplaceable loss of natural capital whose goods & services help to provide resilience to social systems. Value of these goods & services is not reflected in economic markets thus they are vulnerable to being discounted or overlooked in decision-making</p> <p>Also include in the economic section as a future challenge- improvement of the valuation of these ecosystem services</p> <p>Important to 'build-in' an evaluation of ecosystem services in decision-making that affects biodiversity, since in many instances the costs of replacing ecosystem services with artificial/man-made products/technologies costs of mitigation, repairing, etc far outweigh costs avoided on maintaining ecosystems for their goods & services</p>	<p>Page 36 6.5 Biodiversity Trends: Risks</p> <p>P. 46- last bullet 7.7Risks & opportunities of Economic trends</p>	<p>Chapter 2 Trends & Implications Para 7.7 p55 bullet 6</p>	<p>Already there, and dealt with via inclusions of similar comments (refer SANBI comments above).</p> <p>Already dealt with to some extent (para 6.9) & given that this is Framework, not comprehensive trends analysis, no further changes are made. See response to next comment.</p> <p>Basically this point is there, and has been reinforced to include gist of the comment</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Lack of capacity retention wrt provincial government as a challenge to be included. Salary scales attract new graduated who have to receive training & capacity building. Once training's done & gain experience, many leave for private sector- an iterative process. Thus many govt departments are characterised by capacity problems and extremely high-turnover of staff. Challenge is to revisit staffing & salary structures to attract capacity & encourage capacity retention.</p> <p>Mention the Happy Planet Index, Friends of the Earth & the New Economics Foundation Report '06</p> <p>Essential that capacity attraction and retention challenges are addressed if this point is to be achieved</p> <p>Amend subheading to read "Planning & <i>decision-making</i> for sustainable dev" : Also need better tools to integrate social, economic & ecological info and ensure interlinkages are recognised & addressed in planning & decision making</p>	<p>P. 56: 9.3 Provincial & local govt trends</p> <p>P.62: 10 Implications of the trends analysis</p> <p>P.73: 13.1 Enhancing systems for integrated planning & implementation</p> <p>P.73</p>	<p>Chapter 2 Trends & Implications Para 10 p73</p>	<p>Agreed, but no need to include – too detailed for Framework document</p> <p>Included</p> <p>Noted – however retention of capacity by addressing salary scales is an issue to be captured in the action plan and not at the level of a Framework document. No change made.</p> <p>Noted but no change made.</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Under value for our ecosystems: add sentence ...in all sectors of society, that the co-dependencies of social systems & ecosystems is recognised, that economic valuation of ecosystems services becomes integral part of development planning & decision-making, and...etc</p> <p>Suggestion: Add another subheading : “Investing in protecting & enhancing ecosystem services (beyond water!): Investment in ecosystems to ensure provision of reliable and good quality ecosystems services shows a positive return on investment (e.g. Poverty Environment Partnership '05 investing in envtal wealth for poverty reduction, envt for MDGs)</p> <p>Addition to paragraph:enhancing the quality of the natural environment; matching the scale and location of settlements to the opportunities, constraints and ecosystem services of the receiving environment so that they can be sustained; changing by laws... etc</p> <p>Concern: Strategies often do not translate into forcible actions on the ground...would it not be possible to investigate embedding the strategies into existing laws, policies, plans, etc?</p>	<p>P.74: Sustaining our ecosystems & using natural resources efficiently</p> <p>P.74</p> <p>P. 76 Creating sustainable human settlements</p> <p>P.85 Process to be followed in implementing the NSSD</p>	<p>Chapter 3 Priority areas Para 13.1.2 p86</p> <p>Chapter 3 Priority areas Para 13.1.2 p87 bullet 2</p> <p>Chapter 3 Priority areas Para 13.1.4 p90 bullet 1</p>	<p>Have inserted some text again (originally taken from Biodiversity Specialist Paper).This is also covered in other parts</p> <p>Included</p> <p>Included this sentence</p> <p>Noted – this issue must be dealt with under next phase.</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
<p>19. NATIONAL TREASURY</p>	<p>Update Competition Act of 1979 mentioned in the doc to Competition Act No 89 of 1998 (as amended). In addition the Act goes much further and is a principal national instrument to promote economic growth, improve telecoms infrastructure & regulation, encourage competition in the energy sector through alternative sources such as renewable energy & independent power producers & promote sustainable consumption & production.</p> <p>In terms of public finance, the NFSD identifies a series of priority actions that may require additional funding across a range of sector (including introduction of national air quality monitoring system, implementing waste mgt strategy, creating sustainable human settlements and climate change mitigation & adaptation). Cost implications are modest in some instances, but in others are more substantial & may require reprioritisations or sequencing over time, taking into account fiscal policy considerations and other spending pressures.</p> <p>NFSD should therefore indicate that financial aspects of its implementation will be taken into account as part of Gvt's ongoing budget process & MTEF, which will in turn provide for more detailed assessments of the objectives & implementation plans of specific programmes.</p> <p>Recommendation that a summary of anticipated costs of collective action be provided to Cabinet when final approval for strategy is sought.</p>	<p>Overall document</p>	<p>Chapter 4 Making it Happen Para 16.1 p102</p>	<p>Annex deleted</p> <p>Included – refer chapter 4; section on Process – Phase 2.</p> <p>Noted</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Strategic priorities identified that could have economic impacts for the private sector:</p> <ul style="list-style-type: none"> ▪ SEAs ▪ National commitment to cease oil imports ▪ Investment in clean coal technology, biofuels and renewable energy ▪ Changing infrastructure plans, designs & standards to promote sustainability & training to develop new skills to maintain the sustainable infrastructure ▪ Economic & fiscal instruments 		<p>Chapter 3 Priority areas Para 13.1.2 p87 bullet 4 p87 bullet 5</p> <p>Para 12.1 p78 Para 13.1.3 p89 bullet 1</p> <p>Para 13.1.2 p87 bullet 7 Chapter 4 Making it Happen Para 16.1 p102 bullet 2</p>	<p>Comment re SEA no longer relevant as it was referred to in a statement in Annex that has been deleted Oil: refers to commitments elsewhere & not suggested for SA ;changed “cease” to “decrease”</p> <p>Clean technology: Included in chapter 3; Sustaining ecosystems (energy efficiency bullet)</p> <p>Infrastructure: Included – chapter 3: Highlights & achievements (see Comment); & Economic development (Developing skills bullet)</p> <p>Economic: Included – refer chapter 3; Sustaining ecosystems (Economic & fiscal instruments bullet); and chapter 4; Process – Phase 2 (mobilising resources)</p>
20. UNISA	<p>NSSD to discuss more clearly the role of business, especially big business in SD (section 49 of JPOI) e.g promotion of the UN Global Compact by BUSA & NBI as well as other measures such as OECD Guidelines for Multinational Enterprise .</p>	Overall doc		Noted

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>NSSD to consider the potential role of Type 2 partnerships in SA at various scales as there are some very inspiring examples of such initiatives and should recommend measures to enhance such initiatives' accountability & performance</p>		<p>Chapter 2 Trends & Implications Para 9.5 p68</p>	<p>Included</p>
<p>21. Association of Cementitious Material Producers (ACMP)</p>	<p>Need more qualified and substantiated references to cement i.e. w.r.t. statement made on over-reliance on cement in infrastructure design given that cement requires huge quantities of energy to make and which in turn, is why it is the fourth largest emitter of carbon dioxide (after oil, gas and coal). Second statement on p. 75 encourages building systems that minimise the use of cement, given the rising cost and negative environmental impact of cement.</p> <p>ACMP requests that these statements be removed from the document as they portray the industry in a negative light and do not reflect the following:</p> <ul style="list-style-type: none"> ▪ Critical role cement plays in the infrastructural & housing development of economies worldwide and in particular Southern Africa ▪ Environmental initiatives introduced by industry worldwide and in Southern Africa to minimise environmental impacts & resource consumption in the production of cement ▪ The significant reductions in specific CO2 generation of cementitious material sold in SA since 1990, i.e. approx 23% reduction ▪ Well publicised industry commitments to SD made through the WBCSD, Cement Sustainability Initiative (www.wbcscd.cement.org) 	<p>p. 42 and p.75</p> <p>Section 7.3 and Section 13.1</p>		<p>Noted but not appropriate to incorporate comments as this is framework and not intended as comprehensive report and record of actions/ achievements/initiatives taken by every industry/sector.</p> <p>Noted but comment not included as authors disagree that statements portray industry in negative light; this was also not intention of including this information in the first place – merely intended to illustrate point</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Monitoring and Evaluation The development of “high level indicators to measure progress” coupled with an effective monitoring and evaluation system is fully supported. The lack of “environmental data”, which greatly hamper better policy decisions, is a real challenge and the position taken in the document is supported. There is broad agreement that information and indicators on sustainable development is critical for reporting; specifically, monitoring and evaluation of the coast and marine resource are inadequate.</p> <p>Impact of climate change Also make mention of extreme events (flooding, heavy storms, prolonged and frequent periods of drought) associated with the expected impact of climate change. This will trigger a number of cross-cutting and long term impacts on the social, biophysical and economic as well as governance sectors. This also has consequences for the way in which disaster management processes are structured.</p>	<p>Chapter 3 Priority areas Para 12.2 p70, 73 & 88</p> <p>Chapter 2 Trends & Implications Para 5.1 p29</p>	<p>Chapter 3 Priority areas Para 12.2 p81</p> <p>Para 5 p35</p>	<p>Included</p> <p>Included</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Renewable energy Also make mention of the negative environmental and social impacts that the current processes of electricity generation create. Both the high demand for and the historical lack of access to electricity also lead to a number of negative social and environmental impacts as communities then use wood and other fuels for energy. Statistics on the use of “domestic coal burning and paraffin” would be useful.</p> <p>Loss of biodiversity Also make mention of the drastic potential affect of the loss of biodiversity on the tourism industry, which provides an income and livelihood resource for a number of small communities, towns and cities particularly in the Western Cape. It is also recommended that the percentage of area currently under conservation and/or protection and the ideal should be included in the document.</p>	<p>Chapter 2 Trends & Implications Para 6.1 p32</p> <p>Chapter 2 Trends & Implications Para 6.5 p35</p>		<p>Noted however not included – reference to negative impacts already referred to in this section and for this reason no amendment was included.</p> <p>Noted however not included – the document sketches high level trends of loss of biodiversity in respect of all sectors and does not on any one particular sector/industry</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Coastal and marine resources The SFSD places emphasis on marine and fishing activities and neglects to address the terrestrial coastal activities (e.g. coastal infrastructure) and as such is in conflict with the principles of sustainable development. It is recommended that this section be expanded to demonstrate the interdependency of the marine natural resources, the associated social fabric and the economic growth potential. In addition to the risks listed, it is suggested that the following risks be considered: migration of fishing stock, over fishing, population growth, lack of capacity around enforcement, lack of co-ordination in government around implementation of legislation and ensuring compliance, the disturbance of spawning areas, and inadequate provision of “no catch” areas to allow for stock to replenishment. Coastal and marine resources are also under threat due to illegal poaching and unsustainable fishing practices worldwide.</p>	<p>Chapter 2 Trends & Implications Para 6.6 p36</p>	<p>Chapter 3 Priority areas Para 13.1.2 p86</p>	<p>Noted – included over-fishing as risk; reference to negative impacts of enforcement constraints and illegal fishing already included in this section; trends in respect of governance and coordination dealt with generically in section 9.</p>
	<p>Spatial planning The discussion of spatial planning in section 7.6 with specific reference to state led infrastructural investment with the aim of reducing poverty and promoting economic growth, is welcomed.</p>	<p>Chapter 2 Trends & Implications Para 7.6 p44</p>		<p>Noted</p>

SOURCE	COMMENTS	REF. on NFSD	REF. on REVISED NFSD	RESPONSE TO COMMENT & REFERENCE TO FINAL DOCUMENT
	<p>Social issues</p> <ul style="list-style-type: none"> ▪ Development of Integrated / Comprehensive Water Management Strategy - must be consistent with the broader national approach to water management.; ▪ Respect for diverse culture and traditional values, as well as the land and its diversity as the foundation for healthy communities; ▪ Speed up the Land Reform programme, as a means to eradicate poverty; ▪ Integrated Human Settlements still need to be implemented, incorporating sustainable components.; <p>Editorial suggestions and corrections</p> <p>Various</p>	<p>Chapter 1 Context for SD Para 1 p16 Para 2 p17</p> <p>Chapter 2 Trends & Implications Para 8.1 p48 (Table)</p> <p>Chapter 3 Priority areas Para 12.1 p67 Para 14 p80</p>	<p>p21 p22</p> <p>p57</p> <p>p78 Para 13.1.5 p93</p>	<p>Noted – issues listed already covered, alternatively refer to implementation of Framework and as such must be addressed in development of action plan in next phase.</p> <p>Included various editorial suggestions. Changes to Annexes not included as these are no longer appended to Frame work.</p>