THE GREEN CONNECTION
www.thegreenconnection.org.za
PO Box 24308
Lansdowne
7779

***31st July 2023***

# Submission to South African Renewable Energy Masterplan – 31st July 2023

## Contents



## 1. Introduction:

The 1998 White Paper on Energy emphasized the need to focus on renewable energy, It laid out the framework for promoting renewable energy generation, reducing dependence on fossil fuels, and addressing environmental concerns. The paper aimed to achieve a diversified energy mix, increased energy security, and socio-economic development while promoting the integration of renewable technologies into the national energy system. Through this comprehensive document, South Africa sought to pave the way for a greener and more sustainable energy future. While the 1998 White Paper probably needs updating, it is our current policy document and should set the context within which SAREM is proposed.

Given the climate crisis, there is an increasing need for a renewable energy action plan. The South African Renewable Energy Masterplan (SAREM) is appreciated for its goal of articulating its vision, action plan for the power sector wrt renewable electricity and associated storage but it falls short of articulating a vision for renewable energy more broadly.

There needs to be a clear distinction between energy and electricity. in our view, the SAREM has a fatal flaw. it conflates electricity and energy and its assumption is that renewable energy means electricity generation from renewable sources. Renewable Energy is not just about electricity and includes the use of renewable energy in technologies such as biogas digestors, solar water heaters etc.

In our view, The SAREM is limited by the lack of an Integrated Energy Plan, there is no long term vision for energy in South Africa and therefore the role of renewable energy and its subsector of renewable electricity is not placed within the context of a longer term vision.

The emphasis of the SAREM is industrialization, focusing on electricity generation, in general at scale or project level. There is no attention given to energy poverty and how investing in renewable energy could be part of a long term vision of ensuring energy security at household level.

## 2. Consultative Process:

The SAREM speaks to an extensive stakeholder consultation process. However, the details of this (as outlined in Appendix A) speaks of over 200 engagements and lists them. (Page 35). The exclusion of civil society stakeholders from the government's consultation process for the electricity masterplan is surprising and concerning. Such an oversight hinders the potential for comprehensive and inclusive solutions. Meaningful involvement of diverse voices is vital to address the complexities of energy issues and ensure a sustainable and equitable energy strategy.

Even as a masterplan for electricity, it is somewhat astonishing that government failed to include civil society stakeholders in its consultation.

The mere two-week window for comments in the consultative process is insufficient and inherently limiting. The complexity and significance of the renewable energy rollout require a thorough and inclusive participative approach. By submitting preliminary comments, it is crucial to emphasize the need for a comprehensive engagement with all stakeholders, including civil society, to ensure that the South African Renewable Energy Masterplan (SAREM) represents the interests and concerns of the entire society, rather than being skewed towards big business and industry. The transition to renewable energy impacts everyone, making an adequate and meaningful consultation process essential for a successful and equitable energy future.

## 3. Societal Renewable Energy transition:

The absence of a focus area for energy poverty and sustainable energy transition in the South African Renewable Energy Masterplan (SAREM) is a concerning oversight. While market demand, industrialization, and technological transition are important considerations, the plan must also address the social and environmental aspects of the energy transition. Energy poverty affects marginalized communities, and without targeted efforts to address this issue, the transition to renewable energy could exacerbate existing inequalities.

Furthermore, the energy transition must avoid replicating the extractive patterns of the fossil fuel industry, which have historically harmed the environment and local communities. SAREM should incorporate measures to promote responsible and sustainable practices, prioritize local community engagement, and ensure that renewable energy projects are developed in an environmentally and socially responsible manner.

To achieve a successful energy transition, SAREM needs to encompass a holistic approach that ensures that economic interests are located within social and environmental boundaries. By including a focus on energy poverty alleviation and sustainable practices, the plan can become a comprehensive framework for a just and equitable renewable energy future for all South Africans.

Within the vision section of the SAREM, it is laudable to speak of decent employment and skills upskilling, and the importance of BBBEE. However, this is once again within the narrow constraints of a private industry sector of renewable electricity and reads very much like an industrial plan, and not something that should be transformative for the whole of society.

The SAREM highlights that in 2014/2015, 90% of households spent less than R6236 on electricity per year. That is R17 per day. There is an acknowledgement that more than 40% of South Africa's population live in energy poverty. With this appreciation, we would expect that SAREM would look at how providing households with renewable energy not just electricity would help them become more energy secure. However, the interventions that are then outlined are once again focused on business and industrial development not on societal transformation. In our view, the action focuses on a narrow electricity transition of generation technologies – from coal fleet to renewable fleet and there is little attention given to the role that renewable energy (not just electricity) could play in empowering and developing communities and addressing the energy poverty issue.

Civil society has not remained inactive in the transition from fossil fuels to renewable energy but has also focused on the just energy transition. We believe that a key societal aim of SAREM should be to end energy poverty. Government's Independent Power Producers Procurement Programme was praised internationally. A key part of the IPPP programme was its commitment to economic and social development. However, while the programme was laudable, the roll out had some snags.

The SAREM touches on the SED and ED programmes of the REIPPP but fails to address the shortcomings and provide recommendations on how to improve the inclusion of communities. Organisations from civil society, The Green Connection and AIDC have conducted analyses of the situation from a grassroots affected community perspectives and those lessons could provide valuable insights to be included in SAREM.

There is some acknowledgement of social ownership in an action aimed at testing such community led initiatives but the scale up of such existing initiatives or research and development aimed at implementation falls short.

In addition, DMRE already has alternative energy programmes for households that are located far from the grid. It would seem that the SAREM should have acknowledged existing government programmes and proposed ways in which SAREM could integrate and strengthen those programmes aimed at energy security. For example, how does SAREM fit within the electrification programme of the DMRE, particularly the off grid electrification? Where does the Solar Water heater programme integrate as part of SAREM?

The transport sector is currently based on fossil fuels. The necessity to transform the transport sector to renewable energy does not form any substantive part of the SAREM but we believe it needs to address this – and should include an analysis of the demand for electric vehicles within South Africa, the need for increased public transport and whether hydrogen or biogas would play any role in the transport sector, and which parts of the transport sector. This relates again to the lack of an IEP within which public transport and initiatives like moving freight from road to rail should be deliberated.

Women as responsible for energy security in most households, need to be included as key stakeholders. The use of efficient, smoke-less stoves based on sustainable woodlots could also be part of renewable energy transition for society. Women bear the responsibility for energy security through diverse roles, including leadership in policy formulation, advocating for sustainable practices, advancing renewable technologies, and driving energy

conservation efforts. Their active engagement and inclusion in decision-making processes is essential for creating a resilient and inclusive energy future.

The renewable electricity generation industry depends on specific minerals and there is space in South Africa for the responsible development of those minerals to support the technological advances and trade advantages. However, mining affected communities have suffered decades of extractive economic exploitation. SAREM cannot continue with business as usual. We expect to see the inclusion of FPIC and the importance of involving mining affected communities as key stakeholders in the development of SAREM.

Appendix A provides some specific comments with reference to relevant sections of the document.

## 4. Conclusion

There is a need for renewable energy road map. Without an overarching Integrated Energy Plan, the SAREM appears to be floating without context, and it is inadequate as its sole focus is on electricity not energy, and its aim is a plan for the growth of a renewable electricity generation industrial sector.

We believe that the inclusion of civil society stakeholders and particularly affected communities is needed to strengthen the SAREM so that it becomes a societal developmental roadmap that provides a long term plan on how renewable energy in all its form can uplift and improve the lives of all South Africans, especially the poor and vulnerable and marginalized.

**Kholwani Simelane**

**Liziwe McDaid**

## 5. Appendix A: specific comments

| **Point 6, Page 11 : Vision, key objectives and pillars** |
|---|
| - Exposes the focus of this paper – widening access to all is seen as a good thing as " it would further augment the scale of the local market, underpinning industrial development". This is a reasonable objective for a industrial plan but is not optimal for a plan that should aim at ensuring that society receives affordable reliable energy services from renewable energy. |

| **Page 13** |
|---|
| - Alludes to a pillar of fostering inclusive development but once again, it is focused on electricity roll out for hospitals or schools. There is no mention of renewable energy such as solar water rollout which would also benefit such infrastructure, and the rollout |

of such infrastructure contributes to community energy security as solar water heaters would reduce energy bills by using direct solar energy rather than solar pv electricity which still has to be paid for.

**Page 18**

- The table speaks to a number of interventions that are necessary to drive renewable electricity demand. Issues such as the need to strengthen the grid and the need for clear tariff structures that enable a decentralized electricity system. The table is once again an industrial plan but not a societal one. it does not speak to energy services such as hot water, solar cooking, household energy security and the need for affordable, transparent tariff structures. it does not speak to social ownership of renewable electricity infrastructure.
- tariff structures. it does not speak to social ownership of renewable electricity infrastructure and assumes that the future of renewables is the privatization of generation. In our view, this reflects a narrow industrial view and cannot be accepted at a societal view.

**Page 19**

- The discussion around industrial development raises the issue of mining of minerals necessary for the renewable electricity industrial plan. However, there is not attention focused on the mining affected communities, nor is there any acknowledgement of the damage that has been inflicted by the mining sector to date, and their failure to adequately compensate local communities or to rehabilitate post mining. If renewable energy is to be part of the just transition, then it cannot be based on the same models of extraction of the past.

**Page 22**

- The industrial development plan speaks to easing the cost of doing business and fast tracking projects. Civil society has consistently had to oppose projects for short cuts and ignoring environmental impact assessments or public participation processes. The importance of FPIC in all projects needs to be emphasized. Streamlining of processes and the importance of subsidies and incentives are acknowledged but this cannot be at the expense of community participation in decision making, and the need to maintain and restore our ecological heritage. The concerns of present and future generations need to be encompassed in the SAREM and the need to respect cultural norms and traditions needs to be explicitly stated. Free trade areas, industrial development zones have been associated with

weakening of human rights and environmental standards which cannot be acceptable.

| Page 25 Table 6 |
| --- |
| - 6 mentions the “Battery Minerals master plan”. How is a renewable energy master plan derived separately from battery storage and the associated minerals? Surely battery technology is a key part of renewable electricity generation? |

| Page 26 |
| --- |
| - the paper speaks to inclusive development but it is not clear as to whether this means to involve those affected in the decision-making or simply ensuring in a top down manner, that everyone has access to renewable electricity. |

| Page 31 |
| --- |
| The action plan relating to skills development and the need to remain abreast of research and development trends is welcomed. However, again the emphasis on electricity needs to be broadened to take into account other non-electricity uses of renewable energy. Windmills for water pumping, solar water heating, biogas for cooking. All of these technologies need to be included in the basket of renewable energy that is for development and ending energy poverty.<br>- |