



# Centre for Environmental Rights

## Advancing Environmental Rights in South Africa

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### For the attention of the Portfolio Committee on Energy

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Our ref: CER34.25  
13 December 2018

Dear Sir

### PORTFOLIO COMMITTEE ON ENERGY'S 27 NOVEMBER 2018 REPORT ON THE PUBLIC HEARINGS ON THE DRAFT INTEGRATED RESOURCE PLAN, 2018

1. We write to you on behalf of the Life After Coal/Impilo Ngaphandle Kwamalahlle Campaign<sup>1</sup> - a joint campaign with Earthlife Africa<sup>2</sup> and groundWork,<sup>3</sup> which seeks to: discourage the development of new coal coal-fired power stations and mines; reduce emissions from existing coal infrastructure and encourage a coal phase-out; and enable a just transition to sustainable energy systems for the people.
2. We refer to written comments that we, the Centre for Environmental Rights (CER),<sup>4</sup> submitted to the Portfolio Committee on Energy (PCE) on the draft Integrated Resource Plan for Electricity, 2018 ("the draft IRP 2018") on 5 October 2018 ("CER comments"), as well as comments submitted by groundWork to the PCE of 4 October 2018 (both sets of comments are attached). We also refer to oral submissions in this regard made to the PCE by representatives of CER on 16 October 2018, and by groundWork and Earthlife Africa on 23 October 2018. We note that these submissions were made during 5 days of public hearings hosted by the Portfolio Committee on the draft IRP 2018 between 16 and 26 October 2018, with a final "roundtable discussion" taking place on 30 October 2018 ("the hearings").

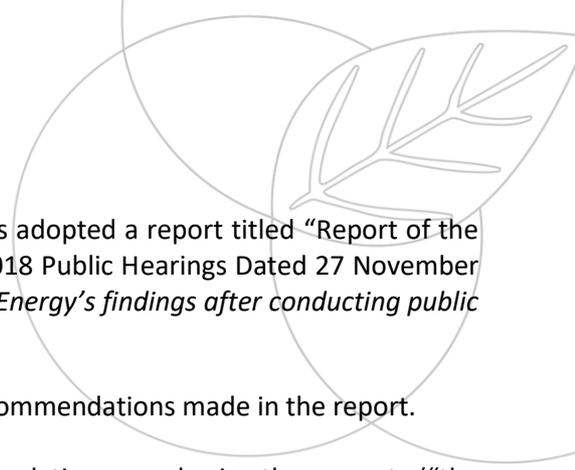
<sup>1</sup> <https://lifeaftercoal.org.za/>.

<sup>2</sup> <http://earthlife.org.za/>.

<sup>3</sup> <http://www.groundwork.org.za/>.

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3. We note further that, purportedly arising from the hearings, the PCE has adopted a report titled “Report of the Portfolio Committee on Energy on the Draft Integrated Resource Plan 2018 Public Hearings Dated 27 November 2018” (‘the report’), the subject of which is “*the Portfolio Committee on Energy’s findings after conducting public hearings on the draft Integrated Resource Plan (IRP) 2018*”.<sup>5</sup>
  4. We write to record that we dispute various of the “findings”, and the recommendations made in the report.
  5. We record our unequivocal objections to some of the recommendations made in the report (“the recommendations”), on the basis that some of these (especially in relation to provision for new coal capacity) are: irrational; not substantiated by facts; misaligned with current realities around climate change and the inevitable transition from coal; and clearly intended to support vested and/or conflicted interests in sustaining an unsustainable coal sector.
  6. Based on statements made during the hearings, and in the report, it is evident that:
    - 6.1. inadequate, if any, regard has been given to the plethora of research by credible, independent expert institutions such as the Council for Scientific and Industrial Research (CSIR);<sup>6</sup> and the Energy Research Centre (ERC),<sup>7</sup> regarding the facts that coal capacity is no longer needed and that there is an urgent need to support a transition from coal to sustainable energy systems – including the substantial jobs and economic benefits that would be derived from implementing this transition as soon as possible;
    - 6.2. only minor regard has been given by the PCE to the health impacts; the climate impacts; the environmental impacts – including for our water resources; and the financial and cost impacts of burning and mining coal for electricity, despite these being devastating for the people of South Africa and giving rise to daily violations of Constitutional rights<sup>8</sup> – a factor which should weigh heavily and be treated with the utmost priority by the PCE; and
    - 6.3. substantial weight has been afforded to representations<sup>9</sup> made by entities and organisations with vested, personal, and/or commercial interests in the continued existence and subsidisation of the coal sector, as well as other energy sectors such as nuclear or renewables – this is highly improper.
  7. We also wish to record our dismay over the manner in which the hearings were conducted. A letter submitted by environmental justice organisation Project 90 by 2030, supported by 24 national and international organisations on 25 October 2018 (attached), records the joint concerns of various civil society organisations (CSOs) in relation to the conduct of the hearings (“the CSO letter”). Two such concerns were the lack of any meaningful interrogation by PCE members of information presented during the hearings, and the lack of community voices in the hearings – particularly communities from the areas most affected by South Africa’s electricity decisions; namely the Mpumalanga Highveld, the Vaal, and the Waterberg – where South Africa’s coal-fired power stations are based.

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<sup>5</sup> P1, PCE report.

<sup>6</sup> Studies conducted by the Council for Scientific and Industrial Research and Meridian Economics conclude that further coal-fired power is unnecessary to meet the South African energy demand and much more expensive than alternatives; particularly renewable solar PV and wind. See [http://meridianeconomics.co.za/wp-content/uploads/2017/11/Eskom-financial-crisis-and-the-viability-of-coalfired-power-in-SA\\_ME\\_20171115.pdf](http://meridianeconomics.co.za/wp-content/uploads/2017/11/Eskom-financial-crisis-and-the-viability-of-coalfired-power-in-SA_ME_20171115.pdf). This November 2017 report by Meridian Economics, relying on modelling by the CSIR, finds that in a 34 year, least-cost optimised, power system operation and expansion plan, no new coal-fired power capacity is built after Eskom’s Kusile power station. It states, “*new coal and nuclear plants are simply no longer competitive. When new capacity is required, demand is met at lowest cost primarily from new solar PV and wind*” (p3, Executive Summary).

<sup>7</sup> See <https://cer.org.za/wp-content/uploads/2018/05/ERC-Coal-IPP-Study-Report-Finalv2-290518.pdf/>

<sup>8</sup> We refer predominantly to the rights enshrined in sections: 24; 27; 9; 10; and 28 of the Constitution of the Republic of South Africa, 1996.

<sup>9</sup> We refer in particular to p5 of the PCE report.

At the hearings, groundWork specifically requested the PCE to ensure that engagements be held around the draft IRP 2018 with communities, particularly in these affected areas. This recommendation is not reflected in the report. We see the report only vaguely recommends that *“the Minister of energy convenes an energy summit to comprehensively discuss and map out the energy future for South Africa”* and that *“the public consultation process is transparent and accessible to the poor and marginalized.”*<sup>10</sup>

8. More importantly, the CSO letter also outlines principles which must, as a minimum, be adhered to in an IRP, in order for it to be rational and lawful. All of the signatory organisations agree that in order for the IRP to be rational, it must move away from fossil fuels, through: accelerated decommissioning of old coal-fired power stations; exclusion of any new coal-fired power stations and nuclear in the energy mix; and provide for unconstrained renewable expansion. The IRP must also address concerns of workers by aligning with a just transition plan.
9. We note and record that the contents of the CSO letter are not reflected in the report – despite this being endorsed by 24 CSOs. This should be corrected and addressed.
10. We do not intend to address in detail the contents of the report, as most of these issues have already been addressed at length in the CER and groundWork comments, attached. We do, however, wish to record our objections to many of the findings, recommendations, and statements made in the report. In particular, we record our objections to the following:
  - 10.1. The report recommends that *“the IRP should make it explicit that both coal and nuclear will remain important elements of South Africa’s energy mix. In the case of coal, new clean coal technologies should be pursued.”*<sup>11</sup>
    - 10.1.1. This is at odds with the Constitutional right to an environment not harmful to health or wellbeing and the right to have the environment protected for the benefit of present and future generations.<sup>12</sup> Coal can no longer be regarded as an important element of South Africa’s future electricity mix. The reasons why provision for new coal capacity and significant reliance on coal capacity are in conflict with the Constitution were provided, in detail in the CER comments (see paragraphs 13 to 17 and 185) and in the oral submissions to Parliament.
    - 10.1.2. We record that the notion of “clean coal” is a myth perpetuated by the coal sector.<sup>13</sup> Due to the coal lifecycle, **there is no such thing as clean coal. Clean coal technologies do not and would not prevent all of the detrimental pollution and health impacts that come from the coal value chain.** Currently, super and ultra-supercritical boilers (USC), circulating fluidised bed systems (CFB), and carbon capture and storage (CCS), are some of the technologies touted as “clean coal” solutions. However, USC and CFB still have high greenhouse gas (GHG) emissions. CFB also produces high volumes of ash, which can be inhaled or enter into, and pollute, water systems. Further, CCS is expensive and requires a particular geology near a coal-fired power station to store the carbon dioxide (CO<sub>2</sub>), in order for it to be viable. Currently, no such feasible storage sites exist. There is also no guarantee as to the permanence and reliability of the storage. Importantly, the costs of CCS are also exorbitant, making CCS non-viable. Furthermore, these technologies do not address any of the other detrimental effects from coal mining and processing coal, such as the loss of fertile land, acid mine drainage (AMD), dust emissions causing dangerous health impacts, and impacts to water resources through abstraction and pollution.
  - 10.2. The report states, *“South Africa still has approximately 200 years or more than 60 billion tons of coal in its reserves. The use of this massive natural endowment cannot be abandoned overnight and therefore South*

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<sup>10</sup> Para 4.14, p16, PCE report.

<sup>11</sup> Para 4.1.13.

<sup>12</sup> S24 of the Constitution.

<sup>13</sup> See <http://www.ee.co.za/article/the-myth-of-clean-coal-why-coal-can-only-ever-be-dirty.html>.

*Africa should continue to pursue new technologies for clean coal. The call that the IRP remove the 1 000 MW of new coal, for financial and environmental reasons, and also remove Kusile Units 5 and 6 cannot be supported. The call for a Just Energy Transition is supported by the PCE. Whilst the inclusion of the two new coal power stations has negative environmental impact, it also has positive impact in terms of job creation and the protection of jobs in the coal sector. Thus, if the Department includes the two coal power stations, it must assess environmental impacts associated with the decision."*

10.2.1. It is highly regrettable, and, we submit, incorrect, that the call for the IRP to remove the 1 000 MW of new coal, for financial and environmental reasons, and also remove Kusile Units 5 and 6 is not supported by the PCE. We submit that – based on credible research and modelling, and the strong community and civil society opposition to new coal capacity – the PCE should reconsider this recommendation. Simply mining and burning the coal because we have it is, with respect, senseless and reckless reasoning.

10.2.2. All credible research and modelling shows that attempting to support, subsidise, and revive the coal sector will: result in substantial financial costs (see paragraph 49.1 of the CER comments); stranded assets (see paragraph 50 of the CER comments); higher electricity costs (see paragraph 64 of the CER comments); further job losses (see paragraphs 76 to 79 of the CER comments); unacceptable GHG emissions and climate change impacts (see paragraph 46.1 of the CER comments); and unacceptable impacts for people's health and the environment – with associated external costs (see paragraphs 46.2 and 46.3 of the CER comments).

10.2.3. Research by Meridian Economics shows that Eskom can save money (R4 million) by abandoning the remaining 2 units of Kusile.<sup>14</sup> South Africa could also save some R20 billion, according to modelling by the ERC, by abandoning the 1000MW of new coal provided for in the draft IRP 2018 (to be derived from the 2 preferred bidders under the first bid window of the Coal Baseload Independent Power Producer Procurement Programme – Thabametsi and Khanyisa ("the coal IPPs")). Modelling by these various institutions also shows that neither the remaining units of Kusile nor the coal IPPs are needed to meet demand. We also record that the Minister of Energy has himself confirmed to Parliament that electricity consumers will pay 1.9c/kWh more by 2030 on a projected electricity tariff of 119c/kWh to accommodate the 2 coal IPPs included in the draft IRP 2018 – a cumulative R23-billion.<sup>15</sup> It is therefore not clear on what basis the PCE recommends that they should be retained in the IRP, or how this would be in the best interests of South Africa. This is strongly disputed.

10.2.4. The report disregards the substantial information regarding the negative impacts of procuring more coal; and assumes positive impacts without any credible bases to justify these. In the report, the PCE finds the socio-economic impact study in the draft IRP 2018 to be wholly insufficient, and recommends the finalisation of an in-depth socio-economic impact study in preparation for the IRP review in 2020.<sup>16</sup> In other words, the PCE, on one hand, assumes that the coal IPPs bring with them significant job opportunities and socio-economic benefits; but on the other, admits that there is no substantiating evidence to support these claims and calls for further research and a report on this.

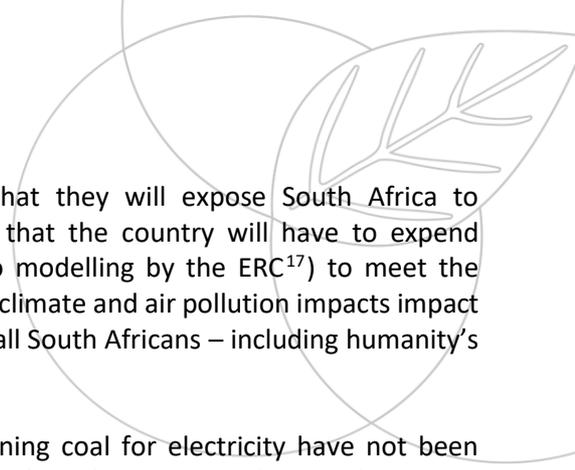
10.2.5. In relation to the coal IPPs, the impacts are not simply environmental and financial. As detailed clearly in the CER comments, these will have detrimental impacts – through raising electricity costs and tariffs – on Eskom, municipalities, consumers, and jobs. They will be 2 of the most GHG

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<sup>14</sup> The study states that "it will be more economic to cancel the construction of Kusile units 5 and 6 than to complete it, even considering that other resources will have to be employed in future to replace the supplies that would have come from units 5 & 6." See paragraph 37 of CER comments and Piv and v, of the Meridian study.

<sup>15</sup> [http://m.engineeringnews.co.za/article/radebe-outlines-additional-cost-of-coal-ipp-2018-10-01/rep\\_id:4433](http://m.engineeringnews.co.za/article/radebe-outlines-additional-cost-of-coal-ipp-2018-10-01/rep_id:4433).

<sup>16</sup> P14 and para 4.5, p15, PCE report.



emission-intensive plants in the world. This means that they will expose South Africa to considerable climate impacts and risks. It also means that the country will have to expend considerable effort and costs (R28 billion, according to modelling by the ERC<sup>17</sup>) to meet the country's GHG emission reduction targets. Furthermore, climate and air pollution impacts impact fundamentally on the wellbeing; lives and livelihoods of all South Africans – including humanity's continued existence.

10.2.6. We are also concerned that the health impacts of burning coal for electricity have not been afforded sufficient weight or concern by the PCE, particularly in the report. Little regard seems to have been given to – what should be highly concerning – information around the debilitating health impacts (air and water) suffered by communities living in close proximity to South Africa's coal plants. Research commissioned by groundWork and conducted by Dr Mike Holland finds that Eskom's air pollution from its coal-fired power stations kills more than 2200 people annually, also causing thousands of cases of bronchitis and asthma in adults and children annually.<sup>18</sup> Although the calculations and methodology are flawed and disputed – the figure should be much higher - the latest health impact assessment commissioned by Eskom finds that emissions from its stations are responsible for the premature deaths of some 320 people every year. This, by any standard, is simply unacceptable and a **gross violation of Constitutional rights - which the PCE should take very seriously and treat with the utmost urgency**. These health impacts also carry economic implications through the costs of illness, deaths, hospital admissions, and lost working days on communities; government funds and resources. These impacts were calculated by Dr Mike Holland to cost South Africa some USD 2,37 billion (more than R33 billion) annually through premature deaths, hospital admissions, and lost working days.<sup>19</sup> The coal IPPs would both be located in designated air quality priority areas – the Highveld Priority Area and the Waterberg-Bojanala Priority Area - areas where National Ambient Air Quality Standards are already out of compliance. The PCE does not seem to have taken this into consideration in recommending that the coal IPPs and remaining 2 units of Kusile go ahead.

10.2.7. We have already addressed the myth of “clean coal” in paragraph 10.1.2 above – this cannot legitimately be relied upon as a solution to address climate, health and environmental concerns – to do so would be misleading and factually incorrect.

10.2.8. With respect, it is contradictory to, on one hand support the need for a just transition, but on the other call for new coal capacity. This demonstrates an inadequate understanding of the fundamental components of achieving a transition that is just. A just transition is about protecting coal workers, it is not about protecting ‘jobs in the coal sector’. It is also about creating a more egalitarian society in place of the gross inequality and substantial unemployment produced by the coal economy. The Coal Transitions report, referred to in the CER comments,<sup>20</sup> states that the sooner a plan is developed and implemented, the better, and that ,rather than subsidising the coal sector directly (as the PCE recommends doing) support should go to the coal workers themselves. This is addressed in further detail below.

10.3. The report states, *“there was ‘almost’ a consensus that climate change is happening and the effects thereof are evident. It is clear that we need to transition but demand is for that transition to be just ... JET must take into account the need to both save and create thousands of jobs”*.<sup>21</sup>

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<sup>17</sup> P34, ERC report.

<sup>18</sup> P15 at <https://lifeaftercoal.org.za/wp-content/uploads/2017/04/Annexure-A4.pdf>.

<sup>19</sup> Holland, M., 2017, <https://lifeaftercoal.org.za/wp-content/uploads/2017/04/Annexure-A4.pdf>

<sup>20</sup> “Implementing Coal Transitions: Insights from case studies of major coal-consuming economies”, available at [https://coaltransitions.files.wordpress.com/2018/09/coal\\_synthesis\\_final.pdf](https://coaltransitions.files.wordpress.com/2018/09/coal_synthesis_final.pdf).

<sup>21</sup> Para 2.1.14.

- 10.3.1. Here we simply wish to reiterate what was stated in the CER comments in relation to jobs and a just transition:

*“early anticipation and preparation of the transition is vital to achieve the best results”;*<sup>22</sup>

*“building new coal plants, locking South Africa into expensive, unnecessary and outdated infrastructure is the worst thing that South Africa could do, including for coal workers and the unemployed. Rather than subsidise the coal industry, support should go to the workers directly; including in efforts to retrain and reskill coal workers”;*<sup>23</sup>

*“[U]niversal electricity access – and economic growth – can be ensured in ... developing countries (i.e. South Africa and India) while also phasing down thermal coal in the power sector ... Universal electricity access to consumers can ... be provided **more cheaply and reliably without coal**” (emphasis added);*<sup>24</sup>

*“Governments should finance the transition, for example by establishing just transition funds into which companies pay and/or ensuring companies have adequate financial resources to pay for the transition of their labour force”;*<sup>25</sup> and

*“pitfalls from past transitions include a propensity to “lock-in” to the incumbent industry to block the arrival of economic diversification. This can often lead to actors trying to “hang on” to a dying industry, neglecting the future **only to finally start economic diversification too late ... structural economic change still takes significant time, resources, and a process of trial and error. Beginning the process of economic diversification is therefore a matter of urgency for all coal- and fossil-fuel intensive regions that wish to survive and provide equivalent or better economic opportunities for the next generations**” (emphasis added).*<sup>26</sup>

- 10.3.2. We submit that insufficient weight and significance has been afforded to climate change – given the enormity of the threat and impacts it poses for the country and its people. With respect, whether or not the PCE believes there is a consensus that climate change is happening is irrelevant: no credible climate scientist disputes this fact.

- 10.3.3. It is contradictory for government to state that it is committed to meeting the international commitments to address climate change, yet to support actions and policies which counter this commitment. Building new coal-fired power stations is a prime example of this incoherence. The Paris Agreement requires countries to keep temperature increases to “well below” 2 °C; however, with current actions and policies, South Africa is on track to cause 3-4 °C warming, according to Climate Action Tracker – with the country’s commitments rated as “highly insufficient”.<sup>27</sup> A report by the New Climate Institute, titled the “Brown to Green Report 2018”,<sup>28</sup> assesses how far the G20 countries have progressed in their transition from a “brown” economy based on fossil fuels to a “green” low-carbon and climate resilient economy. The report states that “[i]f South Africa implements its draft Integrated Resource Plan, newly released in 2018, it would achieve the upper range of its NDC targets. While the plan includes a shift to increase the use of renewable energy, the completion of coal plants under construction and **inclusion of new**

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<sup>22</sup> P6, Coal Transitions Report.

<sup>23</sup> Para 79, CER comments.

<sup>24</sup> Para 78.2, CER comments and p23, Coal Transitions Report.

<sup>25</sup> Para 78.5, CER comments and Coal Transitions Report, p30.

<sup>26</sup> Para 78.6, CER comments and Coal Transitions Report, p32.

<sup>27</sup> See <https://climateactiontracker.org/countries/south-africa/>.

<sup>28</sup> [https://newclimate.org/wp-content/uploads/2018/11/B2G\\_2018\\_rev.pdf](https://newclimate.org/wp-content/uploads/2018/11/B2G_2018_rev.pdf).

***coal power plants already threaten the achievement of the lower range of their NDC target***” (emphasis added).<sup>29</sup>

- 10.3.4. What’s more, the latest report by the United Nations Intergovernmental Panel on Climate Change (IPCC) confirms that in fact, the 2 °C target is not sufficient to protect people from the worst impacts of climate change.<sup>30</sup> **The IPCC warns that there are only a dozen years left for action if global warming is to be kept to a maximum of 1.5°C; beyond which, even half a degree will significantly worsen the risks of drought, floods, extreme heat, and poverty for hundreds of millions of people. Again, this will result in gross violations of Constitutional rights, and it is government’s Constitutional imperative to guard against such impacts on the people of South Africa.** Even keeping any increase to 1.5°C above pre-industrial levels, which now looks increasingly ambitious, will have dramatically-detrimental impacts for South Africa and its people, putting at risk water and food security, health, and economic development.
- 10.3.5. As an example, according to a 2018 parliamentary answer from the Minister of Agriculture, Forestry and Fisheries,<sup>31</sup> government spent - in one year alone - R78 million on drought relief and response to fire incidents in Knysna. In the same answer, it is indicated that, in the current financial year 2018/19, a funding allocation of R170 Million was approved by the National Treasury for the Western Cape Province to procure animal feed for the farmers affected by drought in all affected Districts. These incidents and need for emergency intervention cost, and will increasingly cost, the government enormously, and are likely to become more frequent. The recent Climate Summit in Poland also highlighted the enormous costs faced by governments and investors, including pension funds, as a result of climate change and continued investment in fossil fuels.<sup>32</sup>
- 10.3.6. The report has little to no regard for the negative economic implications – including for jobs – of locking South Africa in to further coal infrastructure.

11. With the above submissions around the harms of building new coal capacity in mind, it is particularly relevant that the report states *“it is incumbent on the PCE to take into account the interests of all South Africans and to always act in the best interest of the Republic of South Africa ... In the PCE’s opinion, the fundamental approach and basis of any government policy should be to respond to and help tackle the triple challenge of unemployment, poverty and inequality.”*<sup>33</sup> We agree fully, and submit – as stated above – that adopting a least-cost IRP without any new coal capacity, would be the best means to secure these objectives.
12. Numerous policies – including the National Development Plan (NDP) - recognise and highlight South Africa’s extreme vulnerability to climate change;<sup>34</sup> and the need to *“reduce pollution and mitigate the effects of climate change”*.<sup>35</sup>
13. The draft IRP 2018 itself confirms that a least-cost electricity plan for South Africa does not include new coal or nuclear.

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<sup>29</sup> P13, Brown to Green Report 2018.

<sup>30</sup> IPCC report available at <https://www.ipcc.ch/sr15/> and see also <https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>.

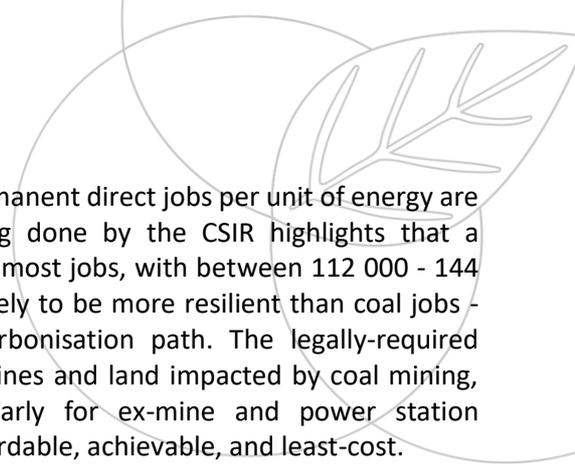
<sup>31</sup> Parliamentary Question No. 3046/NW3410E.

<sup>32</sup> See <https://www.theguardian.com/environment/2018/dec/10/tackle-climate-or-face-financial-crash-say-worlds-biggest-investors>.

<sup>33</sup> P13, PCE report.

<sup>34</sup> P8, National Climate Change Response White Paper.

<sup>35</sup> P163, NDP.

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14. The Department of Energy's (DoE) own study<sup>103</sup> finds that 30% more permanent direct jobs per unit of energy are created with the renewable energy mix than with coal.<sup>104</sup> Modelling done by the CSIR highlights that a decarbonised scenario (95% decarbonisation by 2050) would create the most jobs, with between 112 000 - 144 000 jobs by 2030, reaching up to 331 000 by 2050.<sup>105</sup> These are also likely to be more resilient than coal jobs - which will become increasingly vulnerable in a world on the decarbonisation path. The legally-required decommissioning of Eskom's power plants and rehabilitation of coal mines and land impacted by coal mining, would also result in extensive employment opportunities, particularly for ex-mine and power station workers. Transitioning away from coal is not only favorable, but also affordable, achievable, and least-cost.
  15. When faced with strong evidence (which has not been rebutted or disputed by the DoE or PCE) of the future job losses and economic impacts to be suffered if further investments are made into coal, and detailed, carefully-researched and credible information on the extensive impacts that will be suffered by the country unless firm action is taken to reduce our GHG emissions through urgently reducing our reliance on coal-fired power, it is highly concerning – and difficult to understand - that the PCE retains such a firm stance on continuing to call for future coal capacity, and substantial reliance on coal, in South Africa's electricity mix. This recommendation in the report is strongly disputed, and – we record – in conflict with the Constitution.
  16. The CER comments already confirm that an IRP that makes provision for new coal would not be aligned with the Constitution and would thus be subject to legal challenge.
  17. We note that certain of the statements, views and recommendations reflected in the PCE report were not those of stakeholders, but of Honourable Members of the PCE ("MPs"). We recommend that the PCE report be amended to indicate which views expressed in the document were those of the stakeholders and those of MPs.
  18. In any event, we record that the PCE report is not an accurate reflection of the submissions and full concerns of the Life After Coal Campaign – as confirmed above.
  19. We request that the PCE revise the report to accurately and fairly reflect the concerns of the Life After Coal Campaign as per the submissions made and the points above, and those of our community partners and CSOs, as reflected in the CSO letter. We also request that the PCE revise its recommendations based on these submissions to the PCE.
  20. Given that the PCE's recommendation is to finalise the IRP before year-end, we would appreciate your urgent response.

Yours faithfully

**CENTRE FOR ENVIRONMENTAL RIGHTS**

per: 

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