



# Centre for Environmental Rights

Advancing Environmental Rights in South Africa

Director-General  
Department of Environmental Affairs  
Attn: Mr MA Makwarela  
By email: [mamakwarela@environment.gov.za](mailto:mamakwarela@environment.gov.za)

Our ref: CER/RH/SK

Date: 14 April 2014

Dear Mr Makwarela

## **Additional comments to the declaration of greenhouse gases as priority pollutants**

1. The Centre for Environmental Rights (Centre) submitted comments on the declaration of greenhouse gases as priority air pollutants on 10 April 2014 on behalf of groundWork, the South Durban Community Environmental Alliance, the Vaal Environmental Justice Alliance and the following community groups: Greater Middelburg Residents' Association; Guqa Environmental Community Service; Highveld Environmental Network; Association for Environmental Defence; Mpumalanga Youth Against Climate Change and Wonderfontein Resettlement Forum.
2. The following comments are in addition to the comments already submitted.
3. Annexure 1 of the Declaration does not distinguish between 'land use' and 'land use change'. The latter includes the conversion of natural systems including forests, wetlands and grasslands or the conversion of agricultural land to other uses like settlement or mining. The list also makes no distinction between natural forests and timber plantations.
4. It is submitted that headings be provided for and the heading 'Land use' should include: 'plantation forestry, cropland, settlements, mining, other land - include mining since it involves large scale conversion of land - and 'Land use change' to include: the loss of natural forests, grasslands, wetlands or other natural systems and the conversion of agricultural land to mining or settlement'.

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Yours faithfully  
**CENTRE FOR ENVIRONMENTAL RIGHTS**

per:

A handwritten signature in black ink, appearing to read 'S Kamanja', with a long horizontal stroke extending to the right.

**Sylvia Kamanja**  
**Attorney**

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