



Centre for Environmental Rights

Advancing Environmental Rights in South Africa

The Honourable Minister Mokonyane
Minister of Environmental Affairs

By email: pdaphne@environment.gov.za

By email: cnadasen@environment.gov.za

Copied to:

Ms Nosipho Ngcaba

Director-General

Department of Environmental Affairs

By email: dg@environment.gov.za

nngcaba@environment.gov.za

Dr Thuli Khumalo

National Air Quality Officer

Department of Environmental Affairs

By email: tkhumalo@environment.gov.za

Mr Sabelo Malaza

Chief Directorate: Integrated Environmental Authorisations

Department of Environmental Affairs

By email: smalaza@environment.gov.za

NL/RH

28 March 2019

Dear Minister Mokonyane

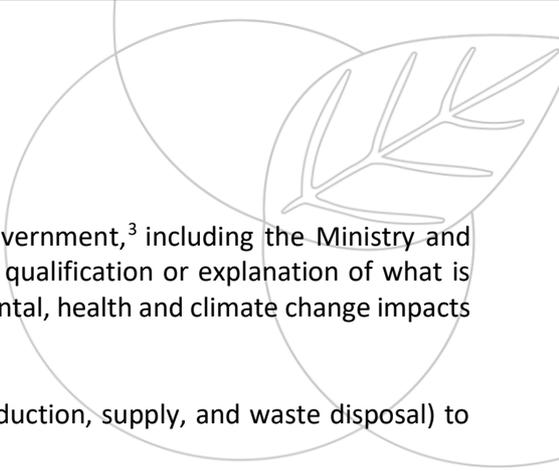
LIFE AFTER COAL FACT SHEET AND TECHNICAL REPORT ON THE MYTH OF “CLEAN COAL”

1. We write to you on behalf of the [Life After Coal Campaign](#).¹
2. We refer to, and attach, for your necessary attention, the following fact sheet and technical report titled “*The Myth of Clean Coal: Why Coal can only ever be dirty*”.²
3. We are bringing this report to your attention in light of a growing, and concerning, narrative emerging from government (and industry) expressing support for the notion of so-called “clean coal”. This is often promoted by proponents with vested commercial interests in the survival of the coal industry, both in South Africa and internationally. “Clean coal” technology is put forward as the lifeline that will allow governments and industry to continue to depend on coal as a sustainable energy generation option. Yet, there is no such thing as “clean coal” in South Africa, or abroad for that matter.
4. We record upfront that any reference to “clean coal” is a misnomer and highly misleading. The Department of Environmental Affairs is well aware that **there are no solutions to neutralise all - or even most - of the dire environmental, health, and climate change impacts caused by coal**, including the mining, beneficiation, and combustion of coal. This is especially so in the context of significantly cleaner and cheaper alternative energy sources - such as wind and solar power - that are available in such abundance in our country.

¹ Life After Coal/Impilo Ngaphandle Kwamalahle is a joint campaign by Earthlife Africa Johannesburg, groundWork, and the Centre for Environmental Rights. We aim to: discourage the development of new 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. See <https://lifeaftercoal.org.za/>.

² <https://lifeaftercoal.org.za/media/new-report-why-there-is-no-such-thing-as-clean-coal>.

Cape Town: 2nd Floor, Springtime Studios, 1 Scott Road, Observatory, 7925, South Africa
Johannesburg: 9th Floor, Southpoint CNR, 87 De Korte Street, Braamfontein, 2001, South Africa
Tel 021 447 1647 (Cape Town) | Tel 010 442 6830 (Johannesburg)
Fax 086 730 9098
www.cer.org.za

- 
5. We therefore object to this reference being used or relied upon by government,³ including the Ministry and Department of Environmental Affairs; particularly in the absence of any qualification or explanation of what is meant by the reference to “clean”, and overlooking the severe environmental, health and climate change impacts associated with the entire coal cycle.
 6. The attached report presents an overview of the coal cycle (mining, production, supply, and waste disposal) to demonstrate that “clean coal” is, in fact, impossible.
 7. In demonstrating that “clean coal” is a myth, the attached report provides an explanation of what makes coal ‘dirty’; why the technologies promoted by “clean coal” proponents can never be a solution; and distinguishes between the types of emission reduction technologies that are currently available to comply with South Africa’s existing air pollution laws. These technologies only exacerbate such external impacts and, if viable at all, **result in a substantial increase in capital and operating costs, compared to readily-available, much more flexible and much less harmful wind and solar power technologies.**
 8. Due to the irrefutable environmental, health, and climate change impacts, and the rapidly-increasing costs associated with the use of fossil fuels, coal-fired power generation is not sustainable. The phasing-out of coal is the only option, and is occurring on a global scale and gaining momentum.
 9. As you are aware, the signs of an inevitable phase-out of coal use and the need for a transition to a renewable energy mix on a low-carbon trajectory are also starting to show domestically – for example, the number of direct employees in the coal mining industry has declined from about 89 000 in 2011/12 to about 82 000 in 2017, while Eskom’s coal consumption has declined from 132.7 million tonnes in 2007/8 to 115.5 million tonnes in 2017/18. This is primarily caused by declining sales, largely driven by rising electricity tariffs, which has encouraged energy efficiency and the use of renewables in factories, commercial properties and households.
 10. A coal phase-out to enable a just transition to a sustainable energy system for the people of South Africa is of paramount importance and cannot be delayed by the false promise of “clean coal” technologies. Continued reliance and re-investment into expensive, unnecessary, and outdated infrastructure will be to the detriment of South Africa, coal-affected communities, coal workers, and the unemployed.
 11. The October 2018 special report launched by the Intergovernmental Panel on Climate Change, tells us that, to achieve a global 1.5 degree Celsius temperature increase target, we need to reduce carbon dioxide (CO₂) emissions by almost half (45%) in 2030 and to almost zero by 2050.⁴ Any prospect of South Africa achieving this trajectory is largely dependent on a **clear position from government not to authorise any new coal-fired power stations, irrespective of technology proposed**, and Eskom actively planning, together with its workers, for a just transition to socially-owned renewable energy projects and a substantial reduction in CO₂ emissions. To do otherwise will risk stranding the workforce, along with redundant coal-fired power plants. “Clean coal” is not and will never be the way forward; it is simply a myth.
 12. We call on the Minister and the Department of Environmental Affairs to consider the information provided in the attached report, particularly in relation to environmental authorisation and licence applications for coal-fired power stations, which claim plans to make use of so-called clean coal technologies.
 13. Please advise if you require any further information and kindly acknowledge receipt of this letter.

³ See for Example Minister Jeff Radebe’s recent statements on “clean coal” <https://www.gov.za/speeches/minister-jeff-radebe-africa-energy-indaba-2019-19-feb-2019-0000> and <http://www.energy.gov.za/files/media/pr/2019/MediaConference-Statement-by-Minister-on-RE-IPP-24February2019.pdf>.

⁴ <https://unfccc.int/topics/science/workstreams/cooperation-with-the-ipcc/ipcc-special-report-on-global-warming-of-15-degc>.

Yours sincerely
CENTRE FOR ENVIRONMENTAL RIGHTS



per:

Nicole Loser
Attorney

Direct email: nloser@cer.org.za

