



# Centre for Environmental Rights

## Advancing Environmental Rights in South Africa

**Honourable Minister Jeff Radebe**

**Minister of Energy**

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**Mr Thabane Zulu**

**Director General**

Department of Energy

Per email: [thembeke.zuma@energy.gov.za](mailto:thembeke.zuma@energy.gov.za)

1 March 2019

Dear Minister

### **LIFE AFTER COAL RESPONSE TO RECENT STATEMENTS AROUND “CLEAN COAL”**

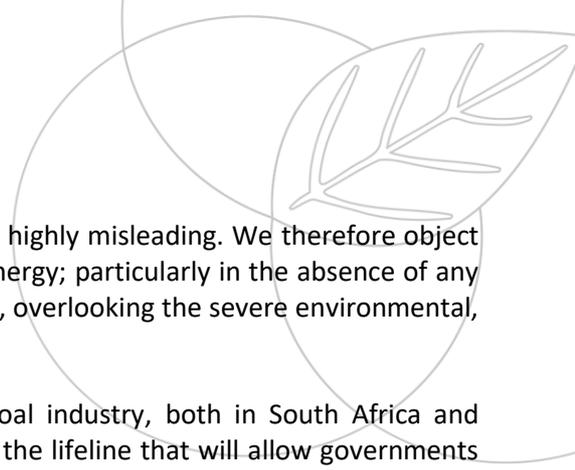
1. We write to you on behalf of the [Life After Coal Campaign](https://lifeaftercoal.org.za/)<sup>1</sup> in relation to recent statements that have been made by the Ministry regarding “clean coal”.
2. We refer to the following:
  - 2.1. Keynote Address by Minister of Energy Honourable Jeff Radebe, MP At Africa Energy Indaba 2019 Sandton International Convention Centre, 19 February 2019;<sup>2</sup> and
  - 2.2. Media Conference Statement by Minister Jeff Radebe, Minister of Energy re Independent Power Producers, 24 February 2019.<sup>3</sup>
3. We note, with concern, the following statements made in the above addresses, respectively:
  - 3.1. *“Whilst South Africa has acceded to the Paris Agreement, and the protection of our citizens through environmentally responsible development is enshrined in our Constitution, we cannot ignore the fact that we have abundant coal reserves and the price of local coal remains relatively low ... Carbon capture and storage, underground coal gasification, coal to liquids and other clean coal technologies are critical considerations that will enable us to continue using our coal resources in an environmentally responsible way”*; and
  - 3.2. *“... This however, does not mean we shall not procure cleaner coal-fired technologies in the future. Coal is part of the energy mix and due to the abundance thereof, South Africa would be hard-pressed should we abandon coal-fired generation. Our policy will become clearer with the imminent finalisation of the IRP update”*

<sup>1</sup> 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/>.

<sup>2</sup> <https://www.gov.za/speeches/minister-jeff-radebe-africa-energy-indaba-2019-19-feb-2019-0000>.

<sup>3</sup> <http://www.energy.gov.za/files/media/pr/2019/MediaConference-Statement-by-Minister-on-RE-IPP-24February2019.pdf>.

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4. We record upfront that any reference to “clean coal” is a misnomer and highly misleading. We therefore object to this reference being used by government, including the Ministry of Energy; particularly in the absence of any qualification or explanation of what is meant by the reference to “clean”, overlooking the severe environmental, health and climate change impacts associated with the entire coal cycle.
  5. Proponents with vested commercial interests in the survival of the coal industry, both in South Africa and internationally, perpetuate the narrative that “clean coal” technology is 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.
  6. We refer to and attach, for your necessary and urgent attention, the following fact sheet and technical report titled “*The Myth of Clean Coal: Why Coal can only ever be dirty*”.<sup>4</sup>
  7. 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. **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.
  8. 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.
  9. 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.<sup>5</sup>
  10. 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.<sup>6</sup>
  11. 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. 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 (CO<sub>2</sub>) emissions by almost half (45%) in 2030 and to almost zero by 2050.<sup>7</sup> Any prospect of South Africa achieving this trajectory is largely dependent on Eskom actively planning, together with its workers, for a just transition to socially-owned renewable energy projects and

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<sup>4</sup> <https://lifeaftercoal.org.za/media/new-report-why-there-is-no-such-thing-as-clean-coal>.

<sup>5</sup> For example, see <https://coaltransitions.org/>; [https://endcoal.org/wp-content/uploads/2018/03/BoomAndBust\\_2018\\_r6.pdf](https://endcoal.org/wp-content/uploads/2018/03/BoomAndBust_2018_r6.pdf); and <http://geopoliticsofrenewables.org/report>.

<sup>6</sup> For example, see [https://endcoal.org/wp-content/uploads/2018/03/BoomAndBust\\_2018\\_r6.pdf](https://endcoal.org/wp-content/uploads/2018/03/BoomAndBust_2018_r6.pdf); <http://geopoliticsofrenewables.org/report>.

<sup>7</sup> <https://unfccc.int/topics/science/workstreams/cooperation-with-the-ipcc/ipcc-special-report-on-global-warming-of-15-degc>.

a substantial reduction in CO<sub>2</sub> 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 remain available to discuss these and other issues – as highlighted in our correspondence of 7 and 8 August 2018 (attached for your ease of reference), to which we continue to await a response.

13. Kindly acknowledge receipt of this letter.

Yours faithfully

**CENTRE FOR ENVIRONMENTAL RIGHTS**

per: 

**Robyn Hugo**

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