

# MRV ACROSS MULTI- LEVEL GOVERNANCE: NATIONAL, PROVINCIAL & MUNICIPAL INSTITUTIONS IN SOUTH AFRICA

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## Executive Summary

Local, provincial and national government all play an important role in the delivery of climate projects. Therefore they will also be critical in implementing the M&E framework as set out in the Climate Change White Paper (DEA, 2011) The White Paper requires the release of the draft Monitoring & Evaluation system by October 2013 (Letete, 2012).

A nationally coordinated M&E system will require integration of data from a variety of public and private sector institutions. This case study focuses on drilling down into how sub-national level government in South Africa are engaging with monitoring, reporting and verification (MRV) of climate projects. Interviews and stakeholder consultations have provided insight into some of the existing reporting practises and highlighted some of the learnings and experiences from local and provincial government.

This study suggests that there are already many MRV-related activities underway that can inform the national process and also demonstrated that there is a willingness of sub-national institutions to engage with the development of the national M&E system. However the practicality of this depends on a few key issues. With 9 provinces, 8 metros, 44 districts and 278 local governments (DEA, 2012) , it is inevitable that the capacity to undertake MRV of climate projects varies significantly from larger metropolitan municipalities to smaller municipalities. The system must build on existing reporting structures and not introduce onerous requirements – rather use simple reporting principles with clear guidelines. Identifying the essential elements that require reporting rather than immediately aiming for the highest accuracy and quality of data is suggested. For example, one local workshop participant noted: *“it does not have to be perfect from the word go but must be good enough- avoiding a situation where we have to invest in a polished system before it is useful. The system should be iterative.”*<sup>1</sup>.

Essentially any national MRV system has to take cognisance of these issues whilst also remembering that for local government in South Africa, priorities lie with providing basic service delivery.

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<sup>1</sup> Input a ERC workshop from NGO participant, supported by City representative

## 1. Introduction

Local, provincial and national government all play an important role in the delivery of climate projects. Therefore they will also be critical in implementing the M&E framework as set out in the Climate Change White Paper (DEA, 2011) The White Paper requires the release of the draft M&E system by October 2013 (Letete, 2012). It is not currently clear how the sub-national and national government processes engage with each other. The aim is to have a national MRV system coordinated by the DEA however there are many challenges about the reality of implementing such a system. There will be varying capacity and institutional arrangements across the different tiers of government.

This study, therefore, starts to capture initial findings on what reporting structures are already in place relating to climate change projects and to MRV or data collection across local and provincial government. It explores what drives these different projects and reporting processes and how these could inform a domestic MRV framework. Furthermore where the best place is to ensure that information would be recorded regularly.

Any nationally coordinated MRV system in South Africa will rely on sub-national levels of government to implement. However, with a population close to 52 million (according to the 2011 Census) served by 9 provinces divided into 8 metropolitan municipalities, 44 district municipalities that in turn are divided into 278 (DEA, 2012) local municipalities, coordinating a multi-level MRV systems is not a mean feat. Local and provincial governments are already burdened with the large challenge of basic service delivery such as sanitation, healthcare and education. Climate change objectives are increasingly becoming part of the provincial and local government agenda, however mitigation and adaptation are in many cases not top priorities or strong drivers for change. Reporting structures exist for various streams of work across the tiers of government, however these are not standardised and are primarily determined by the funding sources, and the priority indicators, for example those identified in Integrated Development Plans.

### 1.1 Methodology

In order to obtain insights from a sub-national perspective, 12 semi structured interviews were held bi-laterally and in small groups with representatives from local and provincial government.

The questions were based around the following themes (the full list of questions are in the appendix):

- **Existing reporting processes** across the different tiers of government
- **Institutional context** & familiarity with the proposed DEA M&E framework
- **Drivers**, incentives & targets to capture & report data
- **Capacity** to collect & report on data
- **Challenges** of data collection: availability and accuracy

A workshop was also held on 21 November 2012 with 25 participants from local, provincial & national government, local government networks, state owned enterprises, NGO and research (see appendix for participants).

## **1.2 Policy context**

The National Climate Change Response White Paper clearly states that there is a need to mainstream climate-resilient development. In order for this White Paper to be consistently implemented a long term framework and institutional coordination will be necessary to including the capacity to “Measure, report and verify climate change responses” (DEA 2011:35). The overall approach of the National Climate Change Response White Paper is to be “integrated and aligned” (DEA 2011:14) as well as prioritise “integrated planning” (DEA 2011:15) in order to ensure that climate considerations are mainstreamed into policy, legislation and planning process at local, provincial and national levels. The White Paper clearly highlights how local governments have a strategic role to play with the implementation of climate change projects. It acknowledges the need for increased capacity and knowledge sharing within and between, provinces and municipalities. It calls for a coordinated strategic and consistent approach between the three spheres of government both in the policy and legislative arena as well as with regard to climate change response and project implementation.

More specifically provincial governments are tasked with preparing Provincial Climate Response Strategies and local governments have a role to play in both planning and service provision. The issue of mandate is also addressed clearly as it acknowledges that local municipalities do not always have a clear mandate for dealing with climate change issues and in cases where there is a lack of clarity policy and legislation revision may be needed in order to extend and clarify this mandate. This review process should be led by the Department of Cooperative Governance and Traditional Affairs (COGTA). Further, National Treasury are tasked with ensuring that fiscal mechanisms relating to operational and capital expenditure need to be in place in order to incentivise municipalities to mainstream effective climate responses. SALGA are tasked with continuing to support local governments respond to climate change (RSA 2011:37).

## **2. Bottom up insights on sub-national MRV**

The main focus of this case study, is to drill down from the top down policy making process, and explore how sub-national governments are currently engaging with MRV related activities. The DEA is coordinating the national effort for a coordinated domestic MRV system, but has also starting working with local and provincial governments to try and integrate existing reporting processes and identify some of the capacity challenges.

This section summarises some of the bottom up research findings from stakeholder interviews, a research workshop, and a further review of already existing initiatives relevant to sub-national reporting in South Africa.

### **2.1 Snapshots from local & provincial government**

It became evident through stakeholder interviews, that there are already MRV-related activities occurring at a local and provincial level. The following section provides some snapshots of different initiatives & experiences relating to MRV:

*a) Experiences from the City of Tshwane<sup>2</sup> , Gauteng*

The **City of Tshwane** has been part of the Department of Energy's EEDSM programme since 2008 .The funding for this programme is being allocated to municipalities through the Division of Revenue Act (DORA). Any energy efficient project that is part of the EEDSM programme must be monitored & verified in accordance with the Eskom M&V process<sup>3</sup>. The SANS 50010 (outlining M&V requirements) standards helps the electricity department at the municipality to specify what must be done. They are working alongside M&V professional teams in University of Pretoria and Tshwane University of Technology.

Their main efforts focus on reducing the municipality's electricity bills through energy efficiency measures on public street lighting. The electricity department at Tshwane has built up capacity to implement this programme and report in line with monthly DoE requirements, internal municipal reporting periods, and to Province. They have also been involved in the Eskom roll out of solar water heating of low cost housing and installing new geysers on RDP housing. Climate change is the responsibility of a different department within the municipality.

*b) Experiences from Ethekeweni Energy Office<sup>4</sup>, Kwazulu-Natal*

The **municipality of Ethekeweni (Energy Office)** is already reporting through the Mexico City Pact, the CARBONN initiative and the Carbon Disclosure Project. They are also using methodologies developed by ICLEI including the international local government GHG emissions analysis protocol (version 1) and the local government operations protocol for the quantification and reporting of GHG (version 1.1) ([www.icleiusa.org/tools/ghg-protocol](http://www.icleiusa.org/tools/ghg-protocol)).To date estimates for the sectoral and operational emissions for the eThekwini Municipality have been made. There are, however, challenges on getting accurate data.

Current projects that are underway to reduce emissions include a street lights pilot as well as the retrofitting of traffic lights. Energy efficiency in the building sector has also been identified as an opportunity; however, challenges with this include: lack of data categorisation (as the system is designed for billing not monitoring) and that there is currently no responsibility allocated for energy efficiency or MRV.

In the context of M&V, eThekwini is considering climate change mitigation and adaptation activities in line with the White Paper, an internal energy management policy, and automated monitoring and reporting system that establishes targets in the KPI's and assigns responsibility.

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<sup>2</sup> Based on interviews

<sup>3</sup> See the ERC scoping study 2011 (Boyd, Rennkamp 2011) which includes a case study on the Eskom M&V programme

<sup>4</sup> based on ERC workshop input from eThekwini energy office

*c) Experiences from City of Cape Town<sup>5</sup>, Western Cape*

The City of Cape Town (CCT) is also currently involved in different activities relating to climate projects and MRV. Interviews were had with representatives of the Energy & Climate Change team, the Integrated Transport team, and the Sustainable Livelihoods branch.

The Energy & Climate Change team is collecting energy consumption data and estimating emissions across the city. They have prepared a State of Energy and Energy Futures Report and the Moving Mountains Report; Cape Town's Action Plan for Energy and Climate Change (City of Cape Town 2011). They are implementing projects to reduce the emissions profile of the city outlined in the Energy & Climate Change Action Plan. The CCT are also part of the municipal EEDSM programme and are focusing on improved energy efficiency in public street lighting, traffic lighting & municipal buildings. In order to implement the projects and collecting data requires working across various city departments: electricity, roads & stormwater, and facilities management and energy & climate change. Energy savings data are being captured in accordance with the EEDSM Programme M&V requirements, which has implications on cost and capacity.

The Bus Rapid Transit system in Cape Town is an example of a non-climate driven project, which has emission reduction potential. The Integrated Transport Team is responsible for its implementation and operations. This does not have a dedicated MRV system set up; however, certain data are being captured anyway for operational and financial purposes. The Sustainable Livelihoods team works indirectly on climate related activities such as the sustainable ceilings project, which has energy, health, housing & job implications. There is no official MRV structure in place. The Integrated Development Plan (IDP) includes indicators for each department that must be reported on and are subject to auditing. The IDP is a requirement from national government for all South African municipalities and could act as an effective tool for stipulating data collection of climate indicators. The IDP is an established & existing system, which could be built on for municipalities to provide data for an MRV system.

*d) Western Province Government<sup>6</sup>*

The **Western Cape Province** is in the process of developing an energy consumption and emissions database, which captures energy consumption disaggregated according to sectors, fuels and district boundaries.

A renewable energy & energy efficiency database for the Province is also being established as well as a Western Cape climate adaptation database.

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<sup>5</sup> based on ERC workshop inputs from the City of Cape Town, four interviews with City Representatives

<sup>6</sup> based on ERC Workshop Presentation, Representative Western Cape

The Western Cape has established an Energy Working Group at the provincial level to establish targets and approaches to reporting on implementation of climate projects. A provincial Sustainable Energy Bill promotes the collection of energy consumption data & project information.

The Province has also introduced a Municipal Support Programme, which came out of a need to support municipalities in the development of climate change responses. The programme currently focuses on developing Climate Change Adaptation Plans Sustainable Energy Plans with municipalities. Challenges relating to MRV from a provincial perspective include capacity constraints, alignment with national processes, avoiding duplication, disaggregation of data, e.g. in energy consumption or transport. Also institutional capacity to deal with sustainable energy issues varies across municipalities.

## 2.2 Workshop

The ERC also hosted a workshop “*MRV/ Monitoring and Evaluation of mitigation actions, their emissions reductions and co-benefits: the role of national, provincial & local governments*” on 20<sup>th</sup> November 2012 in Johannesburg. Participants included representatives from local, provincial and national governments, State Owned Enterprises (SOEs), business (NBI), NGO, and research.

The purpose of the workshop was to facilitate an open dialogue to consider the following questions:

- How are national, provincial and local governments currently approaching MRV?
- How aligned are these institutional approaches?
- How can existing institutional approaches and networks be strengthened to improve MRV?

The Department of Environmental Affairs (DEA) presented the current approach for developing an M&E framework, which also provided an opportunity for sub-national government representatives to engage with the national process.

Twenty-five representatives from local, provincial and national governments, business and academia discussed the way towards a national framework on measuring, reporting and verifying reductions of greenhouse gas emissions in South Africa. And how it could work. The discussions showed that it will be necessary, to have a clear idea on what to report in the first place, and then the measurement and verification question can be solved much easier. There was a clear call for a simple, standardized and central structure, with transparent guidelines.

Inputs from participants at the workshop highlighted some of the activities that are already happening regarding MRV at municipal, national and local level. Below is a snapshot of some of the activities already underway:

A snapshot of activities & networks already underway:

- Energy Efficiency Municipal DSM programme
- SALGA (with type B municipalities)
- ICLEI Urban LEDS initiative & GHG reporting guidelines
- Municipal support programme
- City of Cape Town & eThekweni are capturing their data
- DEA have bi-laterals lined up with sub-nationals to discuss the implementation of the M&E framework
- C40 Toolkit (Johannesburg)
- CARBONN (EThekweni)
- Databases:
  - National: E-targeting (DoE, relating to Energy Info Act)
  - National CC response database
  - Western Province Climate Change & Energy Database
  - SAAQUIS

**Figure 1: Activities occurring at subnational level relating to MRV  
(input from workshop participants)**

### **2.3 Existing toolkits, processes and initiatives**

Based on the stakeholder interviews and workshop inputs (2.1 & 2.2), this section elaborates briefly on some of the initiatives raised by stakeholders. These may be national, international, or locally driven initiatives. The ERC scoping study 2011 (Boyd, Rennkamp 2011) also highlighted relevant databases & policies such as SAAQUIS, the Eskom M&V database that are relevant to multi-level institutions. However these are not discussed again in this case study.

**a) The Municipal Energy Efficiency Demand Side Management Programme (EEDSM)** is one of the components of the implementation of the 2005 National Energy Efficiency Strategy. The overall goal of the municipal EEDSM programme is to reduce electricity consumption by promoting energy efficient practices. The EEDSM grant is provided from the National Treasury, through the Division of Revenue Act, to municipalities to implement Energy Efficiency Demand Side Management initiatives within the municipal infrastructure, namely buildings, public lighting and wastewater treatment and water pumping plants in order to reduce electricity consumption and improve energy efficiency (DoE, 2012).

The condition of the grant includes the following:

- Measurement and verification of energy savings in line with M&V Standard (SANS 50010)
- Provision of baselines, energy saving potentials and pay back period



■ Submission of a business and implementation plan

The M&V reporting from EEDSM interventions are sent to the Department of Energy for approval, and passed on to National Treasury – although it was mentioned that there are some blockages in this process. The EEDSM programme cannot support all municipalities therefore funds are allocated to municipalities for finite periods.

**b) The Municipal support programme** is an initiative established by the Department of Environmental Affairs and Development Planning of the Western Cape Government. It emerges out of a need to support municipalities in the development of climate change responses. The programme has 2 focus areas: Climate Change Adaptation Plans and Sustainable Energy Plans. The engagement with municipalities will take place over 18 months; the Western Province will assist in the development of the plan as well as identifying opportunities to support implementation. They are currently in the planning & development phase, which should be completed in March 2013, following by a 12 month implementation support phase.

**c) The function of the Department of Cooperative Governance and Traditional Affairs (COGTA)**, is to develop national policies and legislation with regard to provinces and local government. Their other function is to support Provinces and Local Government in fulfilling their constitutional and legal obligations. Together with the South African Local Government Association (SALGA), the DEA and the German development agency GIZ, COGTA have been involved in the development of the **Let's Respond Toolkit**<sup>7</sup> (DEA, 2012). This guide aims to support municipalities in mainstreaming climate change issues into their planning processes including the integration of climate change into IDPs. It also touches on elements relating to MRV such as improving information flow. It aims to align climate response within local government with existing climate and development challenges in both adaptation and mitigation.

**d) The South African Local Government Association (SALGA)** works closely with municipalities on climate change related issues including this toolkit and Energy Efficiency Monitoring and Implementation Project (with the Swiss Development Agency). They work particularly closely with those municipalities with less capacity in climate change.

**e) ICLEI URBAN –LEDS** The project, entitled 'Promoting Low Emission Urban Development Strategies in Emerging Economy Countries' (URBAN-LEDS), helps model cities formulate and adopt low carbon strategies and share experiences within their countries and beyond. This global initiative will work primarily in four emerging economy countries: Brazil, South Africa, India and Indonesia. In each of those countries, the project will help model cities to formulate and adopt Urban Low-Emissions Development Strategies, and then share those experiences within their countries and beyond.

At the same time URBAN-LEDS will facilitate a broader interaction between local authorities and global climate actors, to ensure that local governments are appropriately integrated into the global climate mitigation regime. The project will help

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<sup>7</sup> [http://led.co.za/sites/led.co.za/files/cabinet/orgname-raw/document/2012/letsrespond\\_brochure\\_update\\_print.pdf](http://led.co.za/sites/led.co.za/files/cabinet/orgname-raw/document/2012/letsrespond_brochure_update_print.pdf)

to ensure that the promotion, recognition, recording, verification and integration of actions taken by cities to reduce emissions are enhanced.<sup>8</sup>

**f) The City Energy Support Unit** is a unit dedicated to supporting South African cities in their transition to clean energy development and reduced carbon footprints, including initiatives in energy efficiency, renewable energy deployment and energy poverty alleviation ([www.cityenergy.org.za/news](http://www.cityenergy.org.za/news)). They are funded by the British High Commission and DANIDA and run by a South African NGO, Sustainable Energy Africa.

The Unit hosts workshops and facilitates information sharing and resource development for cities. Workshops that relate to MRV activities include; net metering and a SALGA workshop on the Energy Efficiency Monitoring and Implementation Project. Resources include energy efficiency tools for cities, and GHG Emission calculators for cities. This Unit has been mentioned as a valuable and essential capacity building initiative for South African cities.

Above a few of the initiatives have been mentioned – but there are others including the CARBONN initiative, the C40 Toolkit and many more. However the above highlights that there are a range of activities already underway that may inform or feed into a domestic MRV system.

There are cross-cutting themes that emerged from this bottom up engagement with stakeholders. These themes will be elaborated on in more detail in the following findings section. Most discussions have also highlighted that municipalities and Provinces are already involved in some initiatives or processes that could already contribute to a domestic MRV system such as the EEDSM programme and IDP process.

### 3. Findings

It has become clear through discussions with stakeholders and a review of existing activities, that there is already activity happening related to MRV at a sub-national level, which is encouraging. There also appears to be a willingness and interest in engaging with the development of the national M&E framework as outlined by the DEA. The DEA has also started a series of bilateral workshops with local government and municipalities to inform their process. The challenge however remains in how to realize a nationally coordinated framework that builds on existing sub-national activities and allows for the variety of capacity and data quality across the different tiers of government. The DEA has evolved its thinking on the ‘what’ and ‘when’ of the M&E framework (expected by October 2013) but is still at the early stages of developing the ‘how’ in regards to the implementation of this framework. During the course of this research, the following challenges and observations have been raised from the sub-national perspective – and shared by the DEA – and could provide constructive input on the ‘how’.

Some of the key findings included the following:

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<sup>8</sup> More information at: [www.iclei.org/?id=1487&tx\\_ttnews\[tt\\_news\]=4809&tx\\_ttnews\[backPid\]=983&cHash=51a8f8bcc6](http://www.iclei.org/?id=1487&tx_ttnews[tt_news]=4809&tx_ttnews[backPid]=983&cHash=51a8f8bcc6)

[www.iclei.org/fileadmin/user\\_upload/documents/Global/News\\_Items/Press\\_Relases/Urban\\_LEDS\\_press\\_release\\_9\\_March\\_2012.pdf](http://www.iclei.org/fileadmin/user_upload/documents/Global/News_Items/Press_Relases/Urban_LEDS_press_release_9_March_2012.pdf)

- **Linking across existing databases is unclear:** how will the proposed national M&E framework link into existing reporting structures e.g. EEDSM, SAQUIS?
- **Standardising and simplifying reporting** as there are currently multiple reporting formats that sub-nationals must grapple with
- **What will the DEA M&E Framework entail?:** more clarity on the actual format and content of this framework
- **Verification and accuracy of data:** Currently there are no standard requirements for the level of verification of the data that is being captured across different levels of government
- **Attribution and double counting:** if a city reports the implementation of a climate project up the chain, do the emissions get attributed to the city to Province to national, or the external funder?
- **Varying capacities across sub-nationals:** a national M&E system must take into account the varying capacities across sub-nationals
- **How will sub-nationals be integrated into a national MRV system? &** what will the role of sub-nationals within a national M&E framework be, will it be integrated with existing reporting systems ?
- **Prioritisation of mitigation activities.** Should sub-nationals focus on the most emission intensive sectors rather than collecting data on everything?

To elaborate on some of these issues, they have been broadly categorised into: firstly, issues relating to the institutional structures and capacity across the different tiers of government; and, secondly, the issues of data – collection, availability and quality.

#### *Institutional structures & capacity*

With 9 provinces, 8 metros, 44 districts and 278 local governments (DEA, 2012), it is inevitable that the capacity to undertake MRV of climate projects varies significantly. The diagramme below gives an indication of the spread of provincial, district, and local governments.

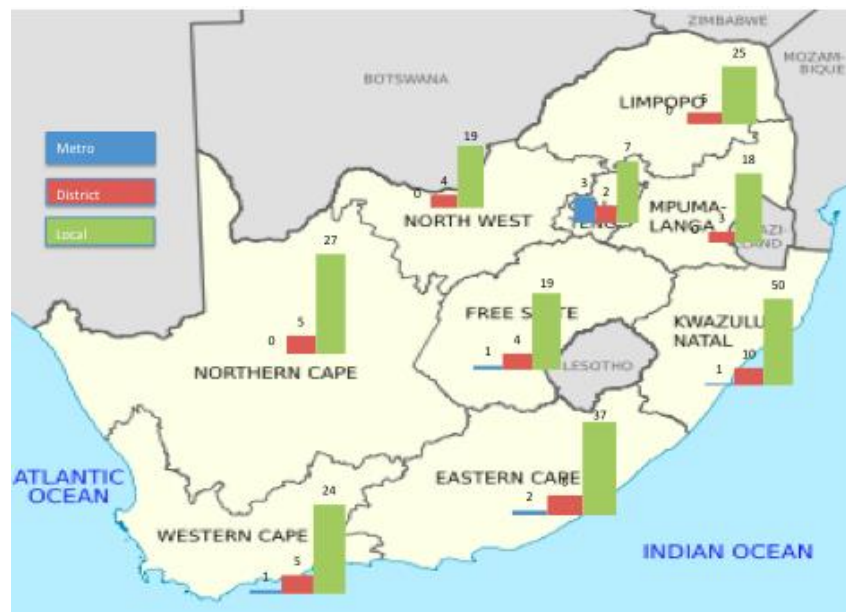


Figure 2: Metro, local & district government in South Africa (authors' own compilation)

For example some municipalities and provinces have dedicated climate change departments, or electricity departments with experience of the Eskom M&V requirements, whereas others don't even possess the capacity to collect, report or how to locate data. Similarly there are varying reporting structures across and within Provinces and municipalities and back to national, which currently lacks integration. The line of reporting will vary and be driven by whether funds are coming directly from national government (and if so which department), or by financial reporting cycles (which are not always in sync from national to municipal level). Within some sectors, for example the waste sector, there is a clear reporting hierarchy across national, provincial and local government, however this is not always the case. With reporting on emissions or climate change projects, these boundaries are not well defined and there is no clear precedent. There is currently insufficient integration across sub-nationals and up to national government. There is no obvious way that municipalities interact with national government, other municipalities or Province.

Lack of capacity to undertake comprehensive data collection, reporting and verification is a critical aspect, but providing incentives to report are also needed. For a municipality, monitoring & reporting of completed projects is likely to be trumped by implementing the next project, unless there are incentives in place to report. These incentives will vary. For example the Department of Public Works is focused on gathering data on 'number of jobs created'. The Department of Energy will require data on electricity savings and finances before releasing money through the EEDSM programme (and only if the necessary M&V process is undertaken). Or at a municipal level where there are certain indicators that are stipulated in the Integrated Development Plans (IDP) that must be reported on annually, and informs the subsequent years budget allocation. But as yet, there are no strong drivers for collecting and reporting data on climate change projects. Local governments are often driven by the provision of basic services which predominantly are non-climate driven such as health improvements or job creation rather than necessarily mitigation and adaptation projects. However, this can also be seen as an opportunity, as non-climate driven projects, such as the Bus Rapid Transit project or ceilings project in Cape Town, are potentially more likely to get implemented as they target other development objectives, but still result in emission reduction potential.

Working within these existing institutional structures poses significant challenges. Also before creating new reporting structures it is important to unblock existing ones. For example as part of the EEDSM programme, municipalities currently report data to the Department of Energy, however the information must then flow to Treasury before money is released – and this is not currently a smooth process. Any attempt to coordinate a national MRV system must take this into consideration. This will also require very clear guidance from the DEA on the national M&E framework. It is essential that any framework is not too onerous and detailed. There needs to be acceptance of a system that is 'good enough' and realistic within existing processes. Sub-national departments are aware that they will have a role in the implementation of a national M&E framework; however, until there is more clarity on the actual format and content of this framework it is challenging to understand what their role will be. Potentially the initial focus could be on gathering data from the larger emitting urban areas such as the metropolitan municipalities.

## *Data*

The institutional structures and interactions are key for the flow of data as well as setting the standards and incentives for collecting and reporting of data and essentially provide the foundations for any MRV framework. However the number of stories, levels and mezzanine levels this framework can have depends on the availability, accuracy and quality of the data that is being collected. Getting a representative picture of implemented climate projects and resulting emission reductions, requires data to be available. But lack of data availability is a crosscutting issue from national, provincial and local government departments.

The level of accuracy in terms of data quality and verification is a challenge. The level of verification is strongly linked to the use of the data. For example there are stringent verification processes in place when applying for CDM projects, or Eskom M&V funding, or being part of the Carbon Disclosure Project. Conversely there are currently no standard requirements for the level of verification data related to climate projects that is being captured across different levels of government. This will become important when implementing domestically funded NAMAs. The extent of verification depends on capacity and financial resources. There is a trade off between the level of accuracy (cost) and purpose of collecting the data. A clear message coming through the discussions with stakeholders is that a domestic MRV system needs to accept a 'good enough' approach in terms of data and verification.

There are already many databases collecting data such as SAAQUIS, Eskom's M&V database (Enerweb) and many others (see Boyd & Rennkamp 2011). However it remains unclear as to how these different databases will link to each other and how these will link into the proposed M&E framework coordinated by the DEA. For the sub-nationals this affects the way they have to provide and present data. Some are already part of the Eskom M&V verification process and have to provide data accordingly. Also all municipalities are required to prepare Integrated Development Plans, with indicators that must be reported against annually and potentially audited. It would be prudent to align the data requirements stipulated by the M&E framework with those already underway.

There are currently multiple reporting formats that sub-nationals must grapple with. Due to varying levels of data availability and capacity across provincial and local governments, it could be valuable to consider standardizing and simplifying any reporting requirements under a national M&E framework – potentially with a series of core elements to include.

The issue of attribution and double counting must also be considered. If a city reports the implementation of a climate project into a national system, do the emissions get attributed to the city to Province or to national government? Potentially an external funder may also wish to report this as their emission reductions. This not only affects the issue of double counting of emissions but also the incentive to report data. Providing the necessary incentive to report is also key. Currently municipalities are required to report through their IDP annually, and this affects budget allocation

## **4. Conclusion**

Developing a domestic MRV system that can function effectively within existing reporting and institutional structures will be complex, and it is not yet clear what is

realistic. Challenges remain relating to capacity of sub-national and national institutions, how to link existing reporting structures and databases, and the quality and availability of data. It is likely that trade-offs will have to be made between the level of accuracy & certainty of the data and the cost & capacity to obtain this data. These considerations will depend on what the data will ultimately be used for.

The responsibility of coordinating a national MRV system will sit with the DEA; however, the successful implementation will rely on the sub-national tiers of government and how they can support the national process – and vice versa. All tiers of government will have a role to play in this framework. In terms of municipalities, potentially the initial focus should remain on capturing ‘good enough’ data from the 8 metros as they have the higher emissions profiles and also generally better capacity and access to data.

Identifying the essential elements that require reporting, implementing a simple system to collect this successfully and developing and building on this approach is likely to be the most successful – rather than immediately aiming for the highest accuracy and quality of data. For example, one local workshop participant noted: “*it does not have to be perfect from the word go but must be good enough- avoiding a situation where we have to invest in a polished system before it is useful. The system should be iterative.*”<sup>9</sup> There also needs to be clarity for assessing mitigation attribution and the system must be flexible and able to evolve over time.

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<sup>9</sup> Input a ERC workshop from NGO participant, supported by City representative

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### 5.1 Interviewees

<b>Interviewee</b>	<b>Representing</b>
3 members from Energy & Climate Change	City of Cape Town
Sustainable Livelihoods	City of Cape Town
Integrated Rapid Transit	City of Cape Town
2 members of the Electricity Department	City of Tshwane
2 members Programme Manager: Climate Change Adaptation	City of Johannesburg
2 members Energy & Climate Change	Western Cape Provincial Government
Representative: Climate Change	Western Cape Provincial Government
Representative: Climate Change	Gauteng Provincial Government



## 5.2 Workshop participants

25 Participants including ERC researchers, attended the workshop on 21<sup>st</sup> November 2012 representing the following organisations:

- Department of Energy
- Department of Environmental Affairs
- Eskom
- Enerweb
- North West DEDECT
- National Business Initiative
- Department of Environmental Affairs
- SALGA
- Ethekwini municipality Energy Office
- ICLEI Africa
- City of Johannesburg
- GIZ
- Western Cape Provincial Government
- Transnet
- City of Cape Town
- Department of Local Government and Housing
- Sustainable Energy Africa
- Energy Research Centre, University of Cape Town

## 5.3 Interview questions

- Overview of the municipal/provincial/national governments in South Africa
- What are the general/loose reporting structures across governments?
- Which municipalities/provinces have climate change projects/targets?
- Which departments at these municipalities/provinces have targets?
- How aware are municipalities/provinces of nat/mun/prov CC targets?
- Do they know about the national M&E targets?
- Do they know about the Energy Collection Data Act?
- Which climate change projects are they currently implementing?
- How are they capturing data on their CC projects?
- What do they actually measure? What are the metrics?(ZAR? Jobs? CO2?)
- Who is responsible for gathering this?
- Why are they gathering data? (financial reporting? To measure emissions?)
- How are they gathering data?
- Where is this data kept?
- Where does the data go? (does it follow up the chain to provincial/national level?)
- If not why not?
- Where are the challenges in reporting up/down the government chain?
- Linking to SALGA? Stats SA? External consultants?
- Capacity to do the reporting?
- Is it an opportunity for job creation?
- Do they have a target/requirement to do 'MRV'?