

Climate Justice Coalition Comments on the Review of the White Paper on Local Government

To: The Minister of Cooperative Governance and Traditional Affairs,

Attention: Project Manager, Mr Thabiso Richard Plank (WPLG26 Policy Review)

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On behalf of the undersigned members and secretariat of the Climate Justice Coalition we submit the following comments on the Review of the White Paper on Local Government.

We preface our comments by noting that the comment window of three weeks for the reviewed draft paper after it was gazetted is unreasonably short and undermines public trust in the legitimacy of this process. We further note that our request for extension was dismissed by the minister. Ironically, the white paper itself outlines how communities and municipalities' current relationship is too often broken and that repairing it, establishing mutual respect and trust are essential for municipalities' development. The short comment window and lack of an extension to enable proper and considered public participation for the entirety of South Africa to engage with this incredibly important white paper undermines the legitimacy of this consultation process. It worsens the already broken public trust with government and perpetuates the sense that this participation process is a mere tick box exercise (a critique the white paper also raises of government practices).

We also note that suggestions and points within previous submissions on the white paper made by contributors to this submission last year have not been addressed in the recent reviewed draft white paper.

1. Local government function is a climate justice issue

We emphasise that the independent and proper functioning of Local government is central to climate justice. Service delivery, and local government functioning underpins the experience of climate change. Climate impacts disrupt and hinders service delivery through damaging service delivery infrastructure needed like roads, buildings and power lines. Simultaneously, poor service delivery undermines our ability to cope with climate impacts. Across the country, services and infrastructure are failing, leaving communities without water, electricity, roads, and even more vulnerable to climate induced disruptions like floods, storms and droughts. Proper local government functioning is a climate justice issue.

2. We cannot be privatising our services for profit in a cost of living crisis.

The Paper advocates for an "enabling environment" for Public-Private Partnerships (PPPs) and simplified pathways for external service providers to ensure efficiency. We understand that municipalities are cash strapped, in part because of the lack of funds

and skills, in part because of corruption and poor financial planning. But the solution cannot be to rely on more loans and private sector that passes costs on to consumers and worsens an already severe cost of living crisis. We need to be investing in not-for-profit community led alternatives, built on community centred service provision and infrastructure maintenance rather than for-profit service providers. This can generate local jobs and opportunities, while maintaining infrastructure and not increasing service costs for the purpose of paying municipal debts or for private service providers profits. South Africans cannot be expected to choose between paying for electricity, for water, for bread, or for housing.

South Africans need avenues for civic education on mechanisms for public participation, engagement and tracking of municipal budgets and processes.

Our constitution assumes that South Africans are active citizens, engaging in democratic processes, and understanding how to track budgets and hold their municipality accountable. Yet we do not have civic education as a component of our Basic Education curriculum. Where do South Africans learn how to become active citizens? The few who do learn often do so out of necessity, because their basic needs are not met, and they are pushed into a system that is complex, full of dense planning documents and budgets, with very little available support. Navigating this comes with additional challenges of accessing these complex documents, the ability to read and understand them and their implications.

3. Local municipalities need to take public participation seriously to have effective development and responses to the climate crisis.

Municipalities need more discipline when carrying out participatory process. They must emphasise public participation and officials must be informed at sessions about what we are hoping to achieve with the IDPs. The Paper uses a "relational governance triangle" to frame the link between elected leaders, professional administration and the community trying to correct an "accountability inversion" where focus is currently tilted upward toward political parties. It frames the community as a partner in an "all-of-society effort" to restore the social contract. While the Paper admits that community participation has become a "compliance ritual" or "tick-box exercise" its proposed solution of "relational governance" risks only modernizing this tokenism. From a People's perspective "partnerships" and "compacts" are more often than not sophisticated tools to top-down manufacture cooperation and manage community frustration rather than shift power. A genuine shift would involve granting communities the "right to consent" and the power to say "no" to industrial or developmental plans that threaten their health and resources.

4. Technomanagerial top-down approaches and reliance on digitalisation and AI cannot bridge the skills and capacity gap existing within municipalities.

The White Paper relies heavily on "digitalization" to improve governance . A "digitalized" municipality is a hollow promise to a community that has no land for food, no safe housing, and no tap for water. The goal of local government should not be to manage the collapse by modernising it through digital tools, but to sustain supportive conditions for life.

5. Climate change considerations must be mainstreamed across local government departments

Local government cannot continue to limit their climate response to environmental sectors and departments. They need to go beyond marketing, messaging and superficially addressing climate change. This crisis is insidious, impacting every level of our existence, with 2025 as the hottest year on record and 2026 on track to break that record. Responding to climate change impacts, in the short and long term, happens at a local level, and responsibility will and is already falling on local municipalities.

Government departments, as well as different levels of government, need to effectively coordinate and connect, as well as understand how climate change impacts them and how they can respond. There needs to be a mechanism for corresponding between national and local government in terms of where this happens on the ground (in terms of holding local government accountable and a transparency mechanism).

6. Socially owned renewable energy must be seriously considered as a mechanism for lowering municipal debt and electricity costs, as well as addressing climate change.

Municipal finance section raises the issue of the costs of electricity, however it does not explore avenues to lower these costs, such as through creating enabling environments for socially owned renewable energy generation, that even could be municipally owned infrastructure in partnership with communities, as a means to lower local electricity prices.

7. Municipalities must enable, not hinder, community development and climate responses

Communities are already organizing their own solutions (e.g., self-sustaining food and energy) in response to state failure, and the climate crisis, but encounter a variety of challenges. Zoning of land by municipalities can actively hinder the initiative of communities trying to address their challenges locally, through limiting what they can do or their ability to access land. These initiatives should be the starting point for development planning rather than a centralized "One Plan", moving more to where knowledge is informed by the People rather than just experts (emancipatory politics). A significant gap in the White Paper is its focus on spatial transformation and economic growth as drivers of success ignoring care economies. To confront structural inequalities the "care infrastructures" that sustain communities are central. This "invisible" labour eg. community gardens, volunteer networks, and domestic care work largely carried by women is often dismissed as "unskilled". A justice-centred policy would transform this work into secure, publicly funded employment linked to food sovereignty and environmental restoration.

8. Strengthen Climate Resilience and Environmental Governance

The Draft White Paper does not adequately address the growing climate challenges faced by municipalities, even though communities are already experiencing floods, heatwaves, droughts, and failing infrastructure. There is a need for clearer responsibilities and stronger action to help municipalities prepare for and respond to climate change. Climate adaptation and environmental protection should be properly included in municipal planning and budgeting. The White Paper should also promote

ecosystem restoration, biodiversity protection, and community-centred solutions that protect both people and the environment. The White Paper treats climate resilience as an “infrastructure durability condition” where plans and investments must be updated to sustain service delivery as climate impacts intensify. It treats ecological infrastructure as a core municipal asset to be managed alongside built infrastructure. This framing must go further, to deal with the environmental and health costs of "green" transitions (like mining minerals for global decarbonisation) are localized in poor Black communities.

9. Address capacity and funding constraints in municipalities

Municipalities are expected to provide services and support development, but many do not have enough money, staff, skills, or support to do this properly. There is a need for better funding for municipalities, stronger cooperation between national, provincial, and local government, and more training and technical support for municipal officials and councillors. Local government reforms must ensure that municipalities have the resources and capacity needed to deliver basic services, respond to climate change, and meet the needs of communities.

10. Promote community led governance

The White Paper should encourage stronger partnerships between municipalities, communities, and civil society organisations when planning and delivering services and climate adaptation. Communities should be actively involved in decisions that affect them, and local knowledge and lived experiences should be recognised as important in shaping development plans and climate solutions.

11. Gender Justice

The Draft White Paper does not properly recognise issues relating to gender, safety, social development, and how these are connected to economic development and climate adaptation. It also does not fully recognise the important role that municipalities and cities play in addressing these challenges. Municipalities should recognise these issues as essential parts of local development because they directly affect community wellbeing, livelihoods, local economies, climate resilience, and the building of safer and more socially connected communities.

12. Harmonising of functions between provincial and local government: The current relationship between provincial and local functions is fractured and often overlapping. Oversight needs to be strengthened but also the clear lines of responsibility should be defined. Provincial government could potentially play a significant role in aligning local municipal functioning, and bridging the gap between national policy and local implementation.

Signed by (organisation name and contact details)

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