

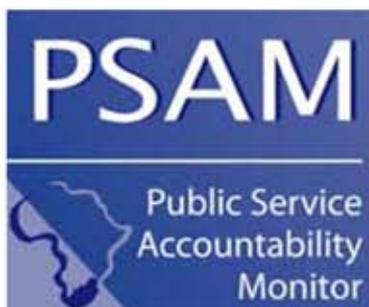
Chief Directorate : Environmental Affairs

■ Department of  
Economic Development,  
Environmental Affairs  
and Tourism

eastern cape, south africa



Analysis of 2013/14 - 2015/16 Annual Performance Plan



Nicholas Scarr

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## Analysis of 2013/14 - 2015/16 Annual Performance Plan

### Chief Directorate: Environmental Affairs

#### Eastern Cape Department of Economic Development, Environmental Affairs & Tourism (DEDEAT)

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Monitoring and Advocacy Programme, Public Service Accountability Monitor

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### Key Findings and Recommendations

#### ***Finding 1***

At the expense of environmental protection, the emphasis in the Annual Performance Plan's Foreword and Strategic Overview is overwhelmingly on economic development, which is consistent with PSAM's 2012 finding of this bias in the Department's strategic planning architecture.

#### ***Finding 2***

The disassociation in 2013/14 of the *carbon reduction and green economy initiatives* strategic objective (SO 3) from the Economic Development and Tourism Programme has severe implications for the Department's strategic paradigm, given that the objective virtually embodies the organisation's single strategic goal, the underlying intention of which is to promote unity of purpose within DEDEAT.

#### ***Finding 3***

With SO 3 having been disassociated from Economic Development and Tourism it is now the preserve of Environmental Affairs, notwithstanding that it is in the first instance an economic objective. But with the objective unsurprisingly finding minimal, if any, expression within Environmental Affairs' performance framework, it effectively appears to exist at a conceptual level only within the Department at this stage.

#### **Finding 4**

The *emission reduction* strategic objective (SO 4) also continues to find minimal expression within Environmental Affairs' performance framework, as it did in 2012/13. This further undermines the Department's strategic fabric, and affirms PSAM's 2012 perception that this fabric has not evolved organically, at least not for Environmental Affairs, but has rather been imposed upon it in a flush of climate change fervor, with little regard for the finer aspects of the Chief Directorate's *modus operandi*.

#### **Finding 5**

Whereas in 2012/13 all of Environmental Affairs' Sub-Programme performance indicators and targets were linked, at least structurally if not in reality, with the strategic objectives SO 3, SO 4 and SO 5 (*securing the provincial conservation status*), in 2013/14 none of them are so linked, with stand-alone indicators and targets having been specified for each objective. However this arrangement raises issues in its own right, does not detract from the fact that SO 3 and SO 4 find little expression within the Programme, and illustrates that essential flaws within DEDEAT's strategic planning framework cannot be eliminated by rearranging the framework.

#### **Recommendation 1**

Since all of these findings point towards an ongoing fundamental disjuncture between the economic development and environmental functions it is prudent to again recommend, as PSAM did in 2012, that urgent attention be directed to terminating the arrangement whereby the functions are housed within the same organization.

#### **Recommendation 2**

Until such time as the economic development and environmental functions are structurally separated, Environmental Affairs should be afforded the opportunity to reformulate its strategic planning framework unencumbered by the need to correlate it with Economic Development and Tourism's.

#### **Recommendation 3**

In the course of reformulating its strategic planning framework Environmental Affairs should retreat from its present climate change orientation and focus on more immediate strategic objectives which are directly attributable across its sub-programme structure, and will expedite progression towards excellence in sub-programme outputs.

#### **Scope of this Evaluation**

In 2012 PSAM produced a comprehensive evaluation of the strategic and annual performance planning frameworks applicable to the Chief Directorate: Environmental Affairs in DEDEAT.<sup>1</sup> The evaluation covered both the original and revised versions of the Department's Strategic Plan for the period 2010/11 – 2014/15, as well as its 2012/13 – 2014/15 Annual Performance Plan (APP). Since in the interim there have not been any

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<sup>1</sup> DEDEAT *Strategic Plan Evaluation 2012/13*, Public Service Accountability Monitor.

revisions to the Strategic Plan, PSAM's 2012 findings in relation to it remain pertinent, and are included hereunder. However in the circumstances the accent of this report is on the 2013/14 – 2015/16 APP (hereafter referred to simply as the 2013/14 APP), with issues which emerged from the 2012 evaluation having been taken into account during its analysis.

The focus on the Chief Directorate: Environmental Affairs accords with PSAM's specific interest in accountability for environmental governance in the Province. Nevertheless, given that the Chief Directorate's planning paradigms are obviously nested within those of the Department as a whole, aspects of the latter are covered in the report where necessary in order to give context to Chief Directorate planning elements.

### **Key findings and recommendations of 2012 evaluation**

Key findings of PSAM's 2012 Strategic Plan Evaluation (SPE) were as follows:<sup>2</sup>

1. Driven by considerations emanating from the global climate change agenda, DEDEAT had recently reduced its strategic goal complement to the single one of seeking recognition as an organization which facilitates and regulates participation in a low-carbon economy. While this is purported to represent unity of purpose across the Department's two core service delivery components of economic development and environmental affairs, it is in the first instance an economic goal. This posed pressing questions about the status of the environmental function within the Department.
2. One of the Department's five strategic objectives, viz. *carbon reduction and green economy initiatives*, which virtually embodies the strategic goal, was ascribed to both the Environmental Affairs and Economic Development Programmes, in accordance with the goal's proclaimed unity of purpose. However, none of Environmental Affairs' 38 strategic objective annual targets for the 2012/13 financial year, and only one of Economic Development's 31, actually appeared to be directed towards the achievement of the objective. Hence the objective found little expression within the fabric of the Economic Development Programme, and none within Environmental Affairs.
3. The marginality of the low-carbon drive at Programme level was affirmed by the fact that the *emission reduction* strategic objective, which appeared to represent Environmental Affairs' contribution to the initiative, only attracted four of the Programme's 38 targets.
4. Only three annual targets had clear linkages to Environmental Affairs' remaining strategic objective, viz. *securing the provincial conservation status*. All-in-all therefore, 31 of the Programme's 38 annual targets were not linked to any of its strategic objectives. The targets did however all align with Environmental Affairs' sub-programme structure, as did the Programme's objectives prior to their revision in accordance with the Department's new-found low-carbon fervor. This implied that the revised strategic planning framework had not evolved organically, at least not for Environmental Affairs, but had rather been foisted upon it with little regard for the

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<sup>2</sup> DEDEAT *Strategic Plan Evaluation 2012/13*, Public Service Accountability Monitor, pp. 1-2.

finer aspects of its *modus operandi*. This was deemed to be an indictment of both top Departmental management and Environmental Affairs leadership, and entrenched a perception of an overwhelming economic development bias in the Department's strategic planning architecture.

5. The Department's low-carbon strategic planning weaknesses were underpinned by its climate change pronouncements, which appeared misguided when viewed against Departmental ineffectiveness in the face of the plethora of environmental maladies which currently wrack the Province, many of which themselves contribute to climate change.

On the basis of the strategic flaws outlined in these findings, which were held to reflect the prevalence of a fundamental disjuncture between the economic development and environmental functions some sixteen years into the Department's lifespan, it was recommended that urgent attention be directed to terminating the arrangement whereby the functions are housed within the same organization. It was further recommended that in the interim the Department should re-examine its strategic thrust in its entirety, and moderate it such that it focused on systematic reinforcement of the foundational aspects of its environmental work, which would enable the creation of a credible platform for higher-level aspirations such as a low-carbon economy.

A further finding was as follows:

6. The distribution of programme performance indicators across Environmental Affairs' sub-programmes pointed to disconnectedness between its strategic planning and operational frameworks. This was not surprising given that in terms of the Department's structural model, sub-programme managers do not have operational control over activities at regional level, where the real substance of the environmental function plays out.

In response to this finding it was recommended that the restructuring process as alluded to in the APP needed to take serious account of and respond appropriately to the constraints imposed on the environmental function by the Department's current structural model.

### **Foreword to the 2013/14 APP**

In its opening paragraph the Foreword indicates that the APP *is aligned to the goals outlined in our strategic plan - our plan to grow the economy and create jobs, whilst at the same time ensuring the conservation and protection of our natural environment.*<sup>3</sup> At the outset it should be noted that in fact, as already alluded to, the Department only has one single strategic goal, viz. that *by 2014 it will be recognized as an innovative, professional organization that facilitates and regulates participation in a growing low-carbon provincial economy.* This single strategic goal is articulated in the Department's revised Strategic Plan,<sup>4</sup> and is referred to in the Foreword's concluding sentence.<sup>5</sup> It has already been pointed out that a key finding of PSAM's 2012 SPE was that while this goal

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<sup>3</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 1.

<sup>4</sup> DEDEAT 2012/13 *Annual Performance Plan*, Annexure 1, pp. 66-75.

<sup>5</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 2.

is purported to represent unity of purpose across the Department's two core service delivery components of economic development (now also incorporating the tourism function, but referred to from hereon as just economic development for simplicity) and environmental affairs, it is in the first instance an economic goal, which poses pressing questions about the status of the environmental function within the Department.

The Foreword asserts that the Department's policy direction is supportive of both implementation of the *National Development Plan*<sup>6</sup> and achievement of the twelve national priority outcomes in the *Outcomes Approach* adopted by the National Cabinet in January 2010.<sup>7</sup> It also lists the eight strategic pillars<sup>8</sup> articulated in the revised Strategic Plan, and affirms that they continue to guide the Department's work. This notwithstanding that they are mistakenly referred to as an assemblage of seven pillars, in conformance with the 2012/13 APP Foreword's omission of the eighth pillar, which had been adopted during revision of the Strategic Plan.

Over and above the mention afforded to environmental governance in the opening paragraph as quoted above, it receives little other coverage in the Foreword besides where it is included in the strategic pillars. In this regard, one of the eight pillars, being *management and protection of the environment* (pillar 3) pertains exclusively to the Department's Programme 3, which embraces the functions of the Chief Directorate: Environmental Affairs. Two others, viz. *achieving a sustainable balance between economic growth and responsible use of land and natural resources* and *creating an enabling regulatory function that ensures legal and regulatory compliance* (pillars 5 & 6 respectively) relate to both of the core Departmental functions of environmental management and economic development.

The reference to the strategic pillars comprises 13 of the Foreword's 75 lines of text, as does the opening paragraph, while closing remarks, which, to the MEC's credit, include the lauding of personnel for *conserving our natural environment*,<sup>9</sup> amount to another 5. However the balance of the Foreword, amounting to 44 lines of text, is constituted by an outline of economic development initiatives and intentions set against a scenario where *tough global economic conditions* are said to have required that the Department *reprioritise efforts towards those priority projects that will have the largest immediate impact on the economy and job creation*.<sup>10</sup> The outline does include references to *building the province as the renewable energy capital of South Africa*,<sup>11</sup> the renewable energy conference hosted by the Department in 2012, and five renewable energy initiatives which will be pursued in the coming year.<sup>12</sup> But in keeping with the complexion of the Department's single strategic goal, these endeavors pertain in the first instance to economic development rather than to the protection of environmental integrity as an end in its own right.<sup>13</sup>

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<sup>6</sup><http://www.npconline.co.za/medialib/downloads/home/NPC%20National%20Development%20Plan%20Vision%202030%20-lo-res.pdf>

<sup>7</sup> <http://www.poa.gov.za/Pages/LandingPage.aspx>

<sup>8</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 2.

<sup>9</sup> *Ibid.*

<sup>10</sup> *Ibid.*, p. 1.

<sup>11</sup> *Ibid.*

<sup>12</sup> *Ibid.*, p. 2.

<sup>13</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 12.

Be this as it may, the sheer imbalance between attention directed at the environmental management and economic development functions respectively in the Foreword highlights explicitly that the inequality between the functions, as alluded to repeatedly in PSAM's 2012 SPE, and profiled in its key findings, continues to prevail. Hence whether intentionally or inadvertently, at its very outset the APP denotes the context in which Programme 3's performance plan has been framed, and must of necessity be viewed.

## **PART A OF APP: STRATEGIC OVERVIEW**

### **Updated performance delivery environment situational analysis**

The imbalance in coverage of the environmental management and economic development functions in the APP Foreword is replicated in the updated performance delivery environment situational analysis, with an account of the global and provincial economic *status quo* occupying six pages of the report, while its environmental equivalent amounts to less than two pages.

The manner in which the economic and environmental elements of the update are conjoined also reflects the disjuncture between these respective Departmental functions as portrayed in the 2012 SPE,<sup>14</sup> even though the shambolic numbering system used in the analysis's lay-out causes some confusion. Section 1.1.1 deals with the global economic context and section 1.1.2 is concerned with the South African context, with emphasis on the Eastern Cape. The latter outlines DEDEAT's vision of *a province where all her people share the benefits of sound environmental management, sustainable development and economic growth*<sup>15</sup> but the provincial context which follows is purely an economic one. In turn section 1.1.3 covers the performance of the Province's economy and prospects for development, but after that the update crosses abruptly into the environmental domain, without any linkages having been drawn between the three aspects of the stated vision. No numbering is assigned to any of the components of the environmental update, which is followed by an account of the implications of the analysis for the Department that is denoted with the same number as the one used for outlining the South African context, viz. 1.1.2.

As in the 2012/13 APP, the environmental update commences with a paragraph entitled *ecosystem destruction in the context of climate change*. The analogy extends beyond this however, with the entire "update," bar one added sentence, being a verbatim repetition of content drawn from the 2012/13 update. At the same time, while coverage relating to the functional areas of *biodiversity management* and *compliance and enforcement* have been carried over from 2012/13, the 2013/14 update inexplicably and worryingly contains no *impact management* coverage, as the 2012/13 update did.

Given that the 2012/13 and 2013/14 environmental updates are almost identical, PSAM's comment on the 2012/13 update<sup>16</sup> is obviously equally applicable here: aside from the welcome concession that *economic progress must be tempered by a consciousness of the impact of such progress on the environment*, and the poetic

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<sup>14</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 19.

<sup>15</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 17.

<sup>16</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, pp. 9-10.

quotation relating to the realization that, after all natural resources have been used up, “we cannot eat money,”<sup>17</sup> the update is no more than a rather dour assemblage of scenarios applicable to selected functional areas, along with various statements of intent, which are not really pertinent to a situational analysis.

More to the point, the absence of any form of actual environmental update for 2013/14, and the virtual repetition of the previous year’s analysis, could be taken to reinforce doubts expressed in the 2012 SPE about the analysis’s acuity, and correspondingly entrench the contention that the environmental challenges which the Province faces are not new, but simply *variations of the perennial challenge of an absence of incisive environmental governance*. Which in turn merits affirmation that *what are new.....are the scale and level of urgency of the responses required in order for this perennial challenge to once and for all be met effectively*.<sup>18</sup>

In this sense climate change may indeed bring new urgency to environmental governance efforts, but in accordance with comment on the 2012/13 APP, while references to it may loom large in the Department’s strategic overview, explicit linkages between it and the routine functioning of Programme 3 are not articulated. And in any event, as contended in the 2012 SPE, *prioritizing climate change interventions while the Department consistently fails at the more elementary level of securing the Province’s environmental integrity through the use of available legal tools is akin to attempting to walk before being able to crawl. More serious though, and deeply ironic, is the fact that activities which the Department is failing to maintain adequate control over in accordance with its legislative mandate include activities which, by all accounts, contribute to climate change. Hence Departmental climate change interventions lack credibility if they are not comprised of a hierarchy of activities premised upon a foundation of getting the basics right*.<sup>19</sup>

Finally, it is worth noting that although the Department invokes the eight strategic pillars referred to in the APP’s Foreword in dealing with the implications of the situational analysis, and three of the pillars pertain, to a greater or lesser degree respectively, to environmental governance, the overall rationale for the pillars is articulated in economic and development terms, without reference to the environment. Thus it is stated that *in light of the structural challenges embedded within the Eastern Cape economy, the Department pursues the developmental agenda that seeks to attain sustainable economic growth and development*<sup>20</sup> by implementing priorities and key interventions in line with the strategic pillars.

This paradigm is entrenched by the analysis’s account of the public entities which report to the MEC for Economic Development, Environmental Affairs and Tourism. Notwithstanding that the management of protected areas lies at the core of the “Parks” responsibility of the Eastern Cape Parks and Tourism Agency, the Agency is regarded as being part of the *DEDEAT Group*, which is in turn described as *the implementation backbone of the Eastern Cape Economic Cluster that primarily seeks to develop an integrated provincial perspective on rural development, consolidate support for the non-*

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<sup>17</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 22.

<sup>18</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 9.

<sup>19</sup> *Ibid*, p. 7.

<sup>20</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 23.

*auto manufacturing and auto cluster initiatives, and strengthen sector analysis, capacity and action research.*<sup>21</sup>

### **Organisational environment situational analysis**

In its organizational environment analysis the 2012/13 APP pointed to an inappropriate Departmental structure, and a restructuring process which was underway. It was indicated that in that financial year the Department *would utilise a clearly articulated and negotiated roll-out plan to implement the revised structure.*<sup>22</sup> It would appear that this did not take place, since the 2013/14 organizational environment analysis refers to *the finalization and implementation of a new organizational structure.*<sup>23</sup>

In its 2012/13 SPE PSAM urged that *serious consideration.....be afforded to addressing the operational constraints imposed on Programme 3 by the Department's current structural model.* Specific concern was expressed about the arrangement whereby operational execution is "delegated" to regional offices and public entities, while the Head Office role is one of *planning, monitoring and evaluation.* In practice this arrangement means that whereas *Programme 3 requires direct, centralized leadership, at sub-programme level, over its regional operations,* these are presently *subjugated to relatively autonomous islands of unspecialized regional leadership, while top-skilled Head Office personnel have no command and control responsibilities within their respective areas of specialization at regional level, where the realities of the environmental function play out.*<sup>24</sup> Naturally these concerns remain, and the Department is again urged to address them.

### **Revisions to legislative and other mandates**

As already indicated, there have been no revisions to the Department's strategic planning framework since the publication of its 2012/13 APP. Hence the 2013/14 APP merely affirms that the Department will continue to align its plans with Outcomes 4, 6, 10 and 12 of the National Cabinet's *Outcomes Approach.* Outcome 12 relates to public service and citizenship qualities, Outcomes 4 and 6 pertain to economic growth, economic infrastructure and employment, and Outcome 10 is articulated as *environmental assets and natural resources that are well protected and continually enhanced.*<sup>25</sup> However, as commented on in PSAM's 2012 SPE, while linkages between the outcomes and the Department's policy and strategy choices may be implicit, no attempts are made to articulate such linkages.<sup>26</sup>

The 2012/13 APP included a table which listed *a range of policy initiatives ..... underway or planned to meet each of the identified Department's priorities.*<sup>27</sup> Activities were listed within the context of the eight strategic dimensions referred to above, but again no

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<sup>21</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 24.

<sup>22</sup> DEDEAT 2012/13 *Annual Performance Plan*, p. 13.

<sup>23</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 27.

<sup>24</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 10.

<sup>25</sup> DEDEAT 2012/13 *Annual Performance Plan*, pp. 13-14.

<sup>26</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 6.

<sup>27</sup> DEDEAT 2012/13 *Annual Performance Plan*, pp. 14-15.

account was provided of explicit linkages between any of these strategic dimensions and related activities, on the one hand, and the Outcomes on the other. The approach to this aspect of the 2013/14 APP is identical, including as it does a table with the same policy initiatives and activities, but no account of linkages between these and the national Outcomes.

Again the activities specified under the *management and protection of the natural environment* policy initiative are *implementation of the Eastern Cape Environmental Act and implementation of the Provincial Climate Change Mitigation and Adaptation Strategy*,<sup>28</sup> and again it is prudent to comment that *given the raft of environmental legal frameworks which are already in place, and the Department's concomitant failure to utilize these effectively to secure the environmental integrity of the Province, the value of the former activity remains to be seen.*<sup>29</sup> Similarly, the reservations already expressed in this report about the Department's fixation with climate change recur here.

Likewise *support for economically beneficial environmental projects at a local level* seems a somewhat nebulous activity in support of the policy initiative entitled *achieving a sustainable balance between economic growth and responsible use of land and natural resources*, while reservations persist about likelihood of the *implementation of Green Economy Guidelines for the Province* making any serious inroads to addressing the unsatisfactory environmental *status quo* in the Province.<sup>30</sup>

Lastly, the commendable *enhancement of existing promotion, compliance and enforcement capability for both environmental and economic development* (sic) and *enhancement of partnerships with law enforcement agencies* are again listed as activities underpinning the policy initiative aimed at *creating an enabling regulatory function that ensures legal and regulatory compliance.*<sup>31</sup>

Legislation which is listed in the 2013/14 APP as being under review includes the Eastern Cape Parks and Tourism Agency Act (Act No. 2 of 2010). The purpose of the review is reportedly *to incorporate regulations and align the Tourism and Conservation Funds*. On the other hand it is indicated that *the Department will undertake a review of regulations, Ordinances and Decrees that were enacted by the Homelands Administrations with the aim of providing for a uniform application of National Norms and Standards across the Province.*<sup>32</sup> The precise relationship between this process and the policy activity of implementing the Eastern Cape Environmental Act is unclear, although it is understood that while environmental conservation legislation emanating from both the Transkei and Ciskei dispensations remains in effect, an express intention of the promulgation of the said Act is the dismantlement of these Homeland frameworks, and the incorporation of worthy components of them into a consolidated Provincial statute.

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<sup>28</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 28.

<sup>29</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 7.

<sup>30</sup> *Ibid.*

<sup>31</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 28.

<sup>32</sup> *Ibid.*, p. 29.

## **Relating expenditure trends to the strategic goal**

In providing an elementary overview of the Departmental budget and MTEF estimates and their relationships to areas of strategic focus, the APP states that Programme 3's healthy budget growth over the MTEF *is informed by the Department's commitment to continue funding infrastructure projects and destination marketing in the ECPTA. In addition to this, R3 million is provided in each year of the MTEF for the National Tourism Career Expo (NTCE) programme (world tourism), while an additional R2 million is for international and domestic trade shows.*<sup>33</sup>

As observed in PSAM's analysis of Programme 3's 2013/14 budget, on the basis of the highlighting under Programme 3 of activities which pertain to the tourism industry, and a corresponding absence of any reference to environmental protection activities, *one could be forgiven for overlooking that at the core of Environmental Affairs' mandate are a host of regulatory functions which need to be exercised across the length and breadth of the Province, and that the integrity of the Province's environment is inextricably linked to their efficacy.* It was further noted that the impression is created that the Programme could actually be the tourism agency which falls under its auspices, rather than an arm of government which is charged with upholding a suite of national environmental policies and laws.<sup>34</sup>

## **PART B OF APP: PROGRAMME & SUB-PROGRAMME PLANS**

### **Strategic goal and objectives**

As already indicated, DEDEAT has reduced its strategic goal complement to the single one of seeking recognition as an organization which facilitates and regulates participation in a low-carbon economy. It has also already been noted that a key finding of PSAM's 2012 SPE was that while the intent underpinning this goal is purportedly *to promote unity of purpose within the Department towards securing a sustainable future for the Province,*<sup>35</sup> the goal is in the first instance an economic one, which raises pressing questions about the status of the environmental function within the Department.

In keeping with the single strategic goal, the Department also reduced its strategic objective complement to just five in number, one of which, viz. *carbon reduction and green economy initiatives (SO 3)*, which virtually embodies the strategic goal, was ascribed in the 2012/13 APP to both the Environmental Affairs and Economic Development Programmes.<sup>36</sup> However, none of Environmental Affairs' 38 strategic objective annual targets, and only one of Economic Development's 31, appeared to be directed towards the achievement of the objective. Hence a further key finding of PSAM's 2012 SPE was that this supposedly pivotal objective actually found little expression within the Economic Development Programme (Programme 2), and none within Environmental Affairs. It moreover failed to give effect to the much-heralded

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<sup>33</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 30.

<sup>34</sup> DEDEAT *Budget Analysis 2013/14*, Public Service Accountability Monitor, p. 19.  
<http://www.psam.org.za/outputs/Budget%20Analysis%201%209%202013-14.pdf>

<sup>35</sup> DEDEAT 2012/13 *Annual Performance Plan*, p. 69.

<sup>36</sup> *Ibid*, pp. 38 & 50.

integration of the Programmes under the banner of the Department's low-carbon economy drive. This dearth of evidence of internalisation of both SO 3, and by implication also the strategic goal itself, into and across Programmes 2 and 3 is compounded in the 2013/14 APP.

### **Programme 2 and SO 3**

In 2012/13, despite only strategic objective annual target 2.29, viz. *green economy and carbon reduction projects (percentage increase in initiatives)*, appearing to have been directed towards the realization of SO 3, all 31 of Programme 2's strategic objective annual targets were nonetheless listed as residing under both SO 2 (*local economic participation*) and SO 3.<sup>37</sup> At the same time, by virtue of the inclusion of a detailed description of SO 3 in the Programme 2 Plan, the association between the Programme and the strategic objective was explicit.<sup>38</sup> Hence although the association may have been substantively tenuous in 2012/13, the Programme nevertheless actively portrayed the objective as an integral element within its strategic planning framework. But in contrast to this, SO 3 receives no mention whatsoever in Economic Development's 2013/14 Programme Plan.

Perhaps unsurprisingly in view of the tenuous nature of the 2012/13 association, it appears to have been quietly terminated in 2013/14, since although none of the 2013/14 Programme Plans contain detailed strategic objective descriptions as they did in 2012/13, it seems plain from Programme 2's strategic objective annual targets<sup>39</sup> that all of the Programme's planning components now reside exclusively under SO 2. Anomalously, the green economy is still specified as a target sector for Sub-Programme 2.2 (*Trade and Sector Development*) in the Programme Overview,<sup>40</sup> and *the number of sustainable energy initiatives facilitated* is again listed as a strategic objective performance indicator (indicator 2.20).<sup>41</sup> But the fact remains that, without explanation, references to SO 3 have been omitted from the Programme Plan.

Aside from entrenching skepticism about DEDEAT's strategic planning paradigm as a whole, this omission arguably amounts to a revision to the Department's Strategic Plan, and should accordingly be reflected as such and justified in an annexure to the 2013/14 APP. The *National Treasury Framework for Strategic Plans and Annual Performance Plans* (Treasury Framework) requires, in relation to Strategic Plans, that *strategic objectives.....should be related to and discussed within the context of the approved budget programme structure*.<sup>42</sup> Thus in 2012/13 SO 3 was related to and discussed within the context of both Programmes 2 and 3, but while this context has been altered, neither the reasoning therefor, nor the strategic planning implications thereof, have been articulated.

Regardless, the omission actually has serious consequences for the Department's strategic planning framework. This is because the inextricable correlation between SO 3

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<sup>37</sup> DEDEAT 2012/13 *Annual Performance Plan*, pp. 39-40.

<sup>38</sup> *Ibid*, p. 38.

<sup>39</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 50.

<sup>40</sup> *Ibid*, p. 48.

<sup>41</sup> *Ibid*, pp. 54 & 61.

<sup>42</sup> *Framework for Strategic Plans and Annual Performance Plans*, National Treasury, August 2010, p. 27.

and the drive for recognition as an organization *which facilitates and regulates participation in a growing low-carbon Provincial economy*<sup>43</sup> means that the disassociation of the objective from one of DEDEAT's two core service delivery programmes effectively neutralizes the Department's single strategic goal, and along with it, pretensions to unity of purpose, and the claim that *the economic and environmental aspects of the low-carbon economy are integrated at the base of our planning pyramid to exploit the competitive advantage of having the two programmes in one Department*.<sup>44</sup>

### **Programme 3 and SO 3**

Reference to the 2013/14 APP confirms that unlike for Programme 2, SO 3 remains a Programme 3 strategic objective.<sup>45</sup> The goal statement for SO 3 is *to increase activity related to a low-carbon and greener economy*,<sup>46</sup> and hence like the single strategic goal, SO 3 is essentially of an economic nature. Yet in further affirmation of the flawed nature of DEDEAT's strategic planning fabric, this economic objective is now the exclusive preserve of the Chief Directorate: Environmental Affairs. However at the same time, unlike for Programme 2, there is nothing in Programme 3's Overview<sup>47</sup> which points to a linkage between SO 3 and the Programme. These ironies are presumably lost on DEDEAT, but in any event they are as revealing as they are perplexing.

At the same time, although SO 3 is purportedly now the preserve of Programme 3, the linkages drawn between the Programme and the objective in Environmental Affairs' Programme Plan are not at all convincing. The solitary strategic objective annual target indicator specified for SO 3 may well be *green economy initiatives*,<sup>48</sup> but of the twenty performance indicators specified for the various Environmental Affairs Sub-Programmes, only one, viz. the *number of job opportunities created through environmental programmes* (indicator 3.18),<sup>49</sup> can conceivably be regarded as conforming with the Department's concept of *carbon reduction and green economy initiatives*.

A footnote to performance indicator 3.18 indicates that it pertains to *job opportunities created through programmes and projects such as working for water, clearing of invasive alien plants, and recycling*.<sup>50</sup> Recycling is consistent with the *improved resource use efficiency* mentioned in the description of a *greener economy* in the 2012/13 APP's justification of SO 3,<sup>51</sup> while activities such as alien plant eradication could arguably fit within the extremely wide (to the point of being vague) "definition" of a low-carbon economy provided in the justification for the Department's single strategic goal.<sup>52</sup> However the purpose of the indicator, as detailed in DEDEAT's technical indicator manual prepared in accordance with the requirements of Treasury Framework,<sup>53</sup> is *to*

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<sup>43</sup> DEDEAT 2012/13 Annual Performance Plan, p. 68.

<sup>44</sup> *Ibid*, p. 69.

<sup>45</sup> DEDEAT 2013/14 Annual Performance Plan, p. 69.

<sup>46</sup> DEDEAT 2012/13 Annual Performance Plan, p. 50.

<sup>47</sup> DEDEAT 2013/14 Annual Performance Plan, p. 68.

<sup>48</sup> *Ibid*, p. 69.

<sup>49</sup> *Ibid*, p. 74.

<sup>50</sup> *Ibid*.

<sup>51</sup> DEDEAT 2012/13 Annual Performance Plan, p. 38.

<sup>52</sup> *Ibid*, p. 69.

<sup>53</sup> Framework for Strategic Plans and Annual Performance Plans, National Treasury, August 2010, p. 36.

*track job creation opportunities,*<sup>54</sup> not increase activity related to a low-carbon and greener economy. It has moreover been specified for the purpose of assessing the performance of the Environmental Empowerment Services Sub-Programme, the purpose of which is *to empower and capacitate the external stakeholders of the Department to meaningfully participate in and contribute to effective environmental management.*<sup>55</sup> With due respect to the Sub-Programme, this role does not exactly equate with championing the Province's green economic ambitions. So given that Programme 3 is DEDEAT's vehicle of choice for pursuing strategic objective SO 3, where exactly within it is the engine for delivery of the green economy initiatives which, the 2013/14 APP asserts, indicate DEDEAT's performance in relation to this cardinal Departmental objective?

As noted, only one single, undetailed indicator has been specified for assessing Programme 3's performance against the annual target set for SO 3. At the same time, aside from some brief footnotes to the 2013/14 strategic objective indicators, no form of technical description is provided for them in either the APP or the technical indicator manual. It is consequently both logical and necessary to presume that the much wider-ranging assemblage of Sub-Programme performance indicators will depict how achievement of the objective is to be attained. But on the available evidence it would seem that SO 3 is not expressly cascaded down into the performance arena at all; in fact it appears to exist in virtual isolation of it, trapped, as it were, at the conceptual level within the Chief Directorate: Environmental Affairs.

The effect of this on SO 3 is devastating. Firstly it exposes, quite correctly, that far from Programme 3 spearheading the drive *to increase activity related to a low-carbon and greener economy,*<sup>56</sup> DEDEAT's economic agenda is actually peripheral to Environmental Affairs' core business. But more crucially, in view of SO 3's dissociation from Programme 2, it actually means that SO 3 is isolated and conceptually trapped not only within Programme 3, but within DEDEAT itself.

DEDEAT's strategic paradigm has regressed significantly in 2013/14. The reconfiguration of an already dubious architecture has laid it bare, but the underlying cause of its fragility remains the fundamental incompatibility between the Department's economic development and environmental functions. The rearrangement of something which is fundamentally flawed cannot and does not eliminate the flaws in it. In the circumstances one can but again urge that *attention should be directed to terminating the arrangement whereby the functions are housed within the same organization.*<sup>57</sup>

### **Strategic objectives and sub-programme performance indicators**

It must be stressed that the linkages referred to in the previous section between SO 3 and indicators 2.20 and 3.18 are deduced rather than articulated ones. This is because

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<sup>54</sup> DEDEAT *Technical Indicators and Evidence Reference Manual for the 2013/14 – 2015/16 Annual Performance Plan*, p.52.

<http://www.dedeat.gov.za/Annual%20Performance%20Plans/APP%202013/final%20updated%20TIDS%202013%20Aug.pdf>

<sup>55</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 68.

<sup>56</sup> DEDEAT 2012/13 *Annual Performance Plan*, p. 73.

<sup>57</sup> See pg. 2 of this report.

while the 2012/13 APP at least purported to denote assemblages of performance indicators in relation to Programme's strategic objectives<sup>58</sup> (even though these relationships served to indict DEDEAT's strategic planning framework<sup>59</sup>), the 2013/14 versions of these assemblages are not linked to strategic objectives in the tables in which they are set out, at least not in so far as Programmes 2 and 3 are concerned.<sup>60</sup> Rather, while the assemblages are categorized by Sub-Programme, they are shown only as being linked with national and provincial priorities and outcomes. The same arrangement prevails in the case of Programme 1 (Administration), although to the Programme's credit, but at the same time curiously, it additionally links one (only) of its four Sub-Programme indicators to the Programme's strategic objective (SO 1).<sup>61</sup>

In presenting its assemblage of indicators in 2012/13, Programme 3 set them out in a manner such that they pertained to the Programme's strategic objectives as a group. Accordingly Programme 3's 38 indicators were specified for SO 3, SO 4 and SO 5 combined, which at face value pointed towards disconnectedness between the objectives and the Programme's real-life functioning. Further appraisal affirmed that impression – as already indicated in this report, not one of the Programme's targets or their respective indicators could be directly linked with SO 3. Similarly SO 4 (*emission reduction*), which like SO 3 is also a flagship for the Department's low-carbon aspirations,<sup>62</sup> only attracted 4 indicators. Therefore between them, SO 3 and SO 4, which together comprise 67% of Programme 3's strategic objective complement, and supposedly encapsulate the Programme's cooption into the Department's low-carbon economy drive, accounted for no more than 10,5% of the Programme's performance indicators.

The implication of this was that the other 34 indicators must have been linked with SO 5 (*securing the provincial conservation status*).<sup>63</sup> However this was not the case at all, with a mere three indicators falling under the auspices of that objective. Hence with only 7 indicators being directly attributable to SO 3, SO 4 and SO 5, a total of 31 out of 38, or 82%, of Programme 3's indicators could not be ascribed to any of its strategic objectives. Critically, however, the indicators aligned logically with Environmental Affairs' Sub-Programmes, as does the assemblage presented in the 2013/14 APP.

It therefore appeared obvious that the 2012/13 performance indicators were linked to the three Programme 3 strategic objectives as a unit because the functioning of Programme 3 simply did not align with the strategic goal and objective framework which had recently been adopted by the Department. This in turn implied that *the framework is not one which has evolved organically, at least not for Programme 3, but has rather been juxtaposed onto an institutional structure and mindset which is ill-at-ease with it, and remains entrenched within its previous paradigm*. Taking this further, PSAM's 2012 SPE found unavoidable the impression *that the changes to Programme 3's objectives subsequent to their originally being tabled in the Strategic Plan have been foisted upon the Chief Directorate with little regard for the finer aspects of its modus operandi*. The fact that that had come to pass was taken to again point towards *an overwhelming*

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<sup>58</sup> DEDEAT 2012/13 *Annual Performance Plan*, pp. 23-25, 39-40 and 52-54.

<sup>59</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, pp. 18-20.

<sup>60</sup> DEDEAT 2013/14 *Annual Performance Plan*, pp. 51-59 & 70-74.

<sup>61</sup> *Ibid*, pp. 39-41.

<sup>62</sup> DEDEAT 2012/13 *Annual Performance Plan*, p. 74.

<sup>63</sup> *Ibid*, p. 75.

*economic development bias in the Department's strategic planning architecture, as well as to indict both top management and Programme 3 leadership. Ultimately, it was concluded that environmental management in the Province resides under a Department which appears to be at odds with itself, and that this does not bode well for the environment.*<sup>64</sup>

### **Strategic objective indicators**

In contrast to the 2012/13 interlinking of all of Programme 3's 38 performance indicators with all three of its strategic objectives, single indicators only have been specified for each objective in 2013/14 APP, as already mentioned in relation to SO 3. Against the backdrop sketched thus far, the question which therefore arises is whether this arrangement constitutes a suitable substitute for the 2012/13 one.

In the case of SO 3, based on the information outlined in the previous section of this report, the answer clearly has to be a resounding no. The indicator may be specific, measurable, achievable, and have timeframes attached to it, but pertaining as it does to the green economy only, and being silent in relation to the carbon reduction aspect of SO 3, its relevance is questionable. Eclipsing this, however, is the fact that the objective exists in isolation within Programme 3, with no evidence of how it is to be cascaded to the performance level. In the circumstances the indicator can be deemed neither relevant nor SMART, and is in fact relatively meaningless.

The situation as regards SO 4 is not much different. The indicator for this objective is listed as *CO<sub>2</sub> emission*, with an accompanying footnote which states *total reduction in CO<sub>2</sub> (sic) emissions per annum (Gg/CO<sub>2</sub> eqv).*<sup>65</sup> Once again however there is no evidence of its positioning within the performance arena, and hence while the indicator may be specific, measurable, relevant and time-bound, the absence of any reference to how and by whom the measuring will be done renders it less than SMART. And as in the case of SO 3, with no linkages having been specified between Programme 3's strategic objectives and its assemblage of 20 Sub-Programme performance indicators, deduction is required in an effort to draw such linkages, if they exist.

In this regard, two of the indicators attributed to Sub-Programme 3.3 (*Environmental Quality Management*) pertain to air quality management. Of these, indicator 3.11, viz. *number of air emission licence applications finalized within legislated time-frames (atmospheric emissions) (demand driven) (sic),*<sup>66</sup> obviously cannot be linked with reducing emissions, since the said licensing will add to and not reduce emissions. Besides which, the technical description of this indicator denotes that its purpose and importance is that it *shows the efficiency and effectiveness of the consideration of air emission license applications.*<sup>67</sup> Indicator 3.12 on the other hand, being the *number of designated organs of state with approved AQMPs*<sup>68</sup> (the latter term being an acronym for air quality management plans) offers promise, although its linkage with SO 4 is at best

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<sup>64</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, pp. 19-20.

<sup>65</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 69.

<sup>66</sup> *Ibid*, p. 72.

<sup>67</sup> DEDEAT *Technical Indicators and Evidence Reference Manual for the 2013/14 – 2015/16 Annual Performance Plan*, p. 48.

<sup>68</sup> DEDEAT 2013/14 *Annual Performance Plan*, p. 72.

oblique: a substantial number in relation to the specified index could be taken to be synonymous with CO<sub>2</sub> reduction if this was a recurring component of such plans, and if the plans were fully implemented. But the second “if” in particular is a big one, and besides this, the purpose and importance specified for this indicator in its respective technical description is silent in relation to CO<sub>2</sub> emissions, denoting only that it shows *the level of management effectiveness towards improved air quality*.<sup>69</sup>

At face value indicator 3.3, viz. the *number of climate change response tools developed*,<sup>70</sup> also represents a possible opportunity for cascading SO 4 to sub-programme level. However from its technical description it is plain that the indicator is directed towards green-house gas *mitigation* and *adaptation*,<sup>71</sup> which is not the same as emission reduction. In the circumstances SO 4 therefore also appears to exist, like SO 3, in something of a vacuum within Programme 3. However, given that three sub-programme indicators do allude to air quality management, and that emission reduction is intrinsic to this discipline, it can be posited that SO 4’s isolation is not as pronounced as that of SO 3.

SO 5, *securing the provincial conservation status*, is incorrectly denoted as SO 2 in Environmental Affairs’ Programme Plan, which moreover mistakenly terms it *securing the provincial conservative status*. That aside, the indicator for this objective is *status of ecosystems and species*, with a footnote indicating that *this is measured on a scale of 1 to 10 with 10 being the highest score*.<sup>72</sup> Pointing out that this indicator is meaningless in the absence of a technical indicator description is a complete understatement. The fact that the specified 2013/14 target against this indicator is the number 7, and that this number is qualified with a footnote which reads *Lapesi and Lambasi Habitat, wetlands restoration and rehabilitation*<sup>73</sup> epitomizes the folly of the indicator package – notwithstanding the randomness (at least within the context of the APP) of this number, is DEDEAT seriously suggesting that the nominated project work constitutes a key plank in the security of the Province’s conservation status?

Once again one is bound to consult DEDEAT’s sub-programme indicators for evidence of follow-through of a strategic objective. In this instance, indicators 3.14, 3.15 and 3.16 certainly all pertain directly to conservation. Indicator 3.14 deals with the *number of biodiversity spatial plans published*, 3.15 with *the hectares of land under conservation (both private and public)* and 3.16 with the *number of provincial protected areas with approved management plans*.<sup>74</sup> At the same time, many other indicators within Programme 3’s assemblage of twenty, such as those associated with Sub-Programme 3.2 (*Compliance and Enforcement*), do so indirectly, to varying degrees. Paradoxically therefore, despite the absence of both a proper technical description for SO 5’s indicator and explicit depiction of the indicator’s link to Environmental Affairs’ sub-programme performance planning framework, the linkage nevertheless appears to be implicit and readily obvious.

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<sup>69</sup> DEDEAT *Technical Indicators and Evidence Reference Manual for the 2013/14 – 2015/16 Annual Performance Plan*, p. 49.

<sup>70</sup> DEDEAT *2013/14 Annual Performance Plan*, p. 70.

<sup>71</sup> DEDEAT *Technical Indicators and Evidence Reference Manual for the 2013/14 – 2015/16 Annual Performance Plan*, p. 44.

<sup>72</sup> DEDEAT *2013/14 Annual Performance Plan*, p. 69.

<sup>73</sup> *Ibid.*

<sup>74</sup> *Ibid.*, p. 73.

It is submitted that this situation is in fact highly significant within the context of the strategic planning weaknesses outlined in this document. In simple terms, while the explicit cascading of strategic objectives into sub-programme planning domains is in principle indispensable, its absence is incrementally more impacting as one progresses from SO 5 through SO 4 to SO 3, and the reason for this is that whereas Programme 3 inherently resonates with SO 5, it does so to a lesser extent with SO 4, and barely does so, if it does so at all, with SO 3.

There is no question that Programme 3's roots lie within the realm of conservation – up until the formation of DEDEAT this was the predominant form of environmental governance in the country, and Environmental Affairs is heavily populated with personnel who served in associated structures – and hence *securing the provincial conservation status* is second nature to it, so to speak. At this stage air quality management is unequivocally also part of the Programme's portfolio, although it is indisputable that its adoption from the national sphere of government, where it previously resided, remains in its infant stages. As such, the escalation of *emission reduction* to the level of one of DEDEAT's five strategic objectives in an apparent flush of post-COP 17 zeal will invariably have over-stretched Environmental Affairs, which is yet to impose itself in the arena of air quality management, let alone that of emission reduction with reference to climate change response.

However it is *carbon reduction and green economy initiatives*, adrift in DEDEAT's conceptual zone and compatible with neither Programme 2 or 3, which really exposes the misguidedness inherent in the Department's current strategic plan. While the Department's leadership deserves credit for seeking to strengthen its embrace of the environmental challenge, the manner in which it has gone about it has exposed how perilously weak that embrace really is. This is untenable for Environmental Affairs, which requires solid and whole-hearted embracement if it is to rise to the sternness of the challenges it faces. If it cannot obtain this within its present structural context, and all indications are that it cannot, it should be cut loose so that it can pursue its agenda as one in its own right, rather than as one which is an adjunct to Economic Development's.

It is emphasized that the situation in this regard is no different to what it was in 2012/13. All that is different is the way in which DEDEAT has sought to tie its various strategic planning elements together in its APP. In doing so it has detached SO 3 from Programme 2 and contrived to make it the sole preserve of Programme 3; specified single performance indicators, rather than full suites of them, for strategic objectives, and, in the case of Programme 3, reduced that suite from 38 indicators to 20. But in the process of doing so it has revealed exactly the same weaknesses as were apparent in 2012/13.

### **Content of sub-programme performance indicators**

In general the consolidation of Programme 3's performance indicators from 38 in number to 20 appears to be an improvement, since some of the poorer elements in the 2012/13 assemblage, as alluded to in PSAM's 2012 SPE,<sup>75</sup> have been eliminated in the process. However, the tables in Annexure 1 to the APP which denote the 2012/13 indicators

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<sup>75</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, pp. 20-21.

which have been removed or modified<sup>76</sup> contain a number of inaccuracies. In Table 11 two different indicators have both been assigned the number of 3.14, and whereas one of them matches the indicator of this number in the 2012/13 APP, the other did not appear there, and neither did the indicator numbered 3.16. In the same table, the strategic objective indicator which replaces 3.29 is specified incorrectly. In Table 12, neither of the indicators denoted 3.23 and 3.24 respectively appeared in the 2012/13 APP, while in Table 13, as per 3.14, two different indicators have both been assigned the number 3.26, and one of them did not feature in the 2012/13 APP; neither did the indicator denoted 3.28, with the correct 3.28 appearing in Table 10; and likewise the indicator denoted 3.30 did not appear in the 2012/13 APP.

All the same, the overarching impression invoked by the revised suite of indicators is that it does not constitute a comprehensive and balanced framework for assessing Programme 3's performance in relation to its mandate and the pressing imperatives associated with it. Allied with this, the suite does not appear to be a particularly ambitious one, as similarly perceived by PSAM in 2012.<sup>77</sup>

The suite includes an inordinate number of indicators, specifically five, or a quarter of the suite's total, which appear to entail outputs by other organisations or players, these being 3.12, 3.14, 3.15, 3.16, and 3.17. It is not clear whether 3.18 covers "environmental programmes" initiated and implemented at the behest of DEDEAT only, or whether it refers to a wider range of programmes in which DEDEAT may play some or other role. If the latter applies, then 3.18 can be added to this category of indicator. At the same time the variables at the center of indicators 3.2, 3.6, 3.7 and 3.9 are controlled by externalities and not the Department. The last three of these indicators have been carried over more or less verbatim from the 2012/13 APP, in which they were numbered 3.7, 3.8 and 3.11 respectively.<sup>78</sup> In its 2012 SPE PSAM noted that these three indicators were *open to the same criticism as that directed at the Department's strategic goal statement*,<sup>79</sup> and this criticism is carried over to 2013/14 along with them. It also applies to 3.2, although the different operational context associated with it is acknowledged.

The essence of the criticism of 3.6, 3.7 and 3.9, which are associated with the Compliance and Enforcement Sub-Programme, is that while targets should relate to actions which DEDEAT itself can control, it does not ordinarily have control over whether particular violations occur or not, and as such the number of responses effected reflects in the first instance the performance not of DEDEAT but of violators of environmental legislation. To reflect primarily on DEDEAT, the numbers need to be assessed against an additional index, such as the number of reports of violations, as suggested by PSAM in 2012,<sup>80</sup> or, ideally, the number of violations which have occurred, although it is accepted that the latter is undoubtedly not practicable at this time, given the scale, extent and complexity of environmental crime in South Africa on the one hand, and the capacity constraints within the State intelligence and response apparatus on the other. The number of responses may well reflect crime, compliance and NEMA section 24G

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<sup>76</sup> DEDEAT 2013/14 *Annual Performance Plan*, pp. 90-94.

<sup>77</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 21.

<sup>78</sup> DEDEAT 2012/13 *Annual Performance Plan*, p. 52.

<sup>79</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 20.

<sup>80</sup> *Ibid.*

application trends, as noted in the indicator's respective technical descriptions,<sup>81</sup> but again, the purpose of performance indicators is to reflect organisations' performances, not external trends.

With regard to additional indices, it is noted that the technical descriptions for the same three indicators all contain references to performance efficiency, but that they specify that this should be reported on, in percentage format, in quarterly reports. This is contested, the suggestion being that efficiency percentages be incorporated in the APP in place of numbers. That said, it is acknowledged that the confinement of compliance and enforcement indicators to the matter of bureaucratic efficiency is sufficiently far removed from the ideal of linking performance effectiveness to external trends to render them somewhat trivial.

The same dynamic pertains in the case of indicators 3.4, 3.10, 3.11 and 3.13, all of which, it can be argued, pertain more to administrative processes than to incisive intervention against spiraling environmental attrition. To its credit, in the case of 3.10, 3.11 and 3.13 the Department's has, whether at PSAM's prompting<sup>82</sup> or otherwise, leveraged control away from externalities by introducing timeframes to indicators which previously did not include them. Nevertheless, given the limitations of indicators of this nature when they are viewed against the enormity of the environmental challenge, there is a compelling need for further, complementary indicators which seek to address the challenge at another, higher level.

It is not feasible to enter into a treatise here on the perfect indicator or suite of indicators. Indicator 3.8 does however stand out in that it is neither overly externality-driven nor bureaucratic in nature, while at the same time it is elementary, SMART, and fundamental to Programme 3's existence and identity, which unfortunately, it is submitted, not all of the indicators in the suite are. Perhaps if Programme 3 was not preoccupied in its strategic planning endeavors with misguided paradigms emanating from the need for it to exist alongside and in the shadow of proponents of economic development, its pathway to formulating a set of strategic objectives and performance indicators which talk explicitly to not only each other, but also the environmental challenge as seen through its own eyes, would be eased, and the level of imperfection in that set would be diminished.

In the interim, indicators 3.19 and 3.20 are favorably regarded, following as they do in the footsteps of 3.8, and if 3.18 pertains to DEDEAT environmental programmes only, the same would apply to it. While the work associated with 3.1, 3.3 and, in particular 3.5 no doubt has its place, it is disputed that it is collectively relevant to the extent that these indicators should account for 15% of Programme 3's performance indicator suite.

### **Summary of key performance indicators**

At this point it is necessary to comment on the group of key performance indicators which is interposed between the Foreword and Part A of the 2013/14 APP.<sup>83</sup> In this

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<sup>81</sup> DEDEAT *Technical Indicators and Evidence Reference Manual for the 2013/14 – 2015/16 Annual Performance Plan*, pp. 45-47.

<sup>82</sup> DEDEAT 2012/13 *Strategic Plan Evaluation*, Public Service Accountability Monitor, p. 20.

<sup>83</sup> DEDEAT 2013/14 *Annual Performance Plan*, pp. 10-13.

regard, notwithstanding the statement that this group *represents a summary of key indicators and targets per sub-programme*,<sup>84</sup> the table which circumscribes it actually contains no references to sub-programmes at all. However, that aside, and more pertinently, although the summary includes nine Programme 3 elements,<sup>85</sup> no indication is provided of the reasoning associated with the assignment of “key” status to them, and on scrutiny no basis for their elevated status is discernible, the assemblage in fact appearing to be quite randomly constituted.

Taking into account the comment offered above on the content of Programme 3’s indicators, it is noted that one of the elements (3.5) is arguably the least relevant of all of those specified for the Programme, while another (3.15) involves action on the part of role-players other than DEDEAT. Two or possibly three (3.8, 3.19 and possibly also 3.18 – see above) are in PSAM’s assessment commendable, but the rest (3.6, 3.7, 3.10 and 3.13) are externality-driven and tend towards being predominantly bureaucratic in nature. Suffice to say that collectively these characteristics do not lend this particular assemblage to being viewed as an especially crucial one.

That said, the summary in any event contains deeper, much further-reaching anomalies. Firstly, it purports to link the strategic objectives SO 4 (*emission reduction*) and SO 5 (*securing the provincial conservation status*) to the nine key Programme 3 elements. This is disturbing given that, as already pointed out, Environmental Affairs’ Programme Plan does not interlink objectives with its suite of twenty sub-programme performance indicators, from which the key elements are drawn. But apart from this structural inconsistency, none of the nine key elements actually relate to air quality management anyway, let alone to emission reduction. Moreover, only one of the elements, viz. 3.15, has a direct relationship with SO 5. These incongruities not only again raise the matter of the relationship between Programme 3’s strategic objectives and performance indicators, which has also already been dealt with in detail, but also beg the question as to how the linkages can be contrived in the summary when in reality they are, respectively, non-existent and marginal.

Even more perplexing is the fact that SO 3 (*carbon reduction and green economy initiatives*) is excluded from the purported Programme 3 linkages despite it being reflected explicitly as one of Environmental Affairs’ strategic objectives in the latter’s Programme Plan. The omission cannot be justified on the basis that SO 3 does not link with any of the nine selected key elements, since neither does SO 4, yet it is included in the summary. Additionally, in terms of the earlier analysis in this report, the one and only Programme 3 indicator which could conceivably be associated with SO 3, viz. 3.18, is incorporated as one of the nine key elements, so a case could arguably still be made for the linkage of SO 3 to the key indicators, whereas none can for SO 4.

Rounding off this anomaly is the summary’s linkage of SO 3 to Programme 2<sup>86</sup> in the face of it not being reflected as a Programme 2 strategic objective in Economic Development’s Programme Plan, while for good measure all four of Programme 1’s performance indicators are linked with its single strategic objective,<sup>87</sup> although its Programme Plan only draws this linkage in relation to a single indicator.

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<sup>84</sup> DEDEAT 2013/14 *Annual Performance Plan*, p.10.

<sup>85</sup> *Ibid*, pp.12-13.

<sup>86</sup> *Ibid*, p.10.

<sup>87</sup> *Ibid*.

The discrepancies between the depictions of the linkages between strategic objectives and performance indicators in the summary and in the various Programme Plans are so extensive and fundamental that one of the versions has to be incorrect. For the purposes of this evaluation it has been presumed that the information contained in the various Programme Plans is correct. This basis for this is that as a whole the summary cannot be regarded as a credible piece of work, being as riddled with flaws as it is, appearing as it does without contextual explanation, and bearing no cross-references to the main report body.



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