

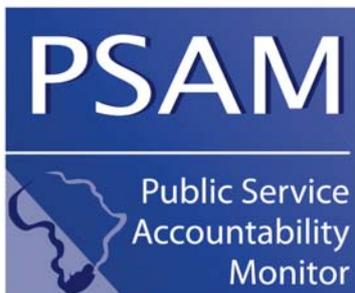
Chief Directorate : Environmental Affairs

■ Department of
Economic Development,
Environmental Affairs
and Tourism

eastern cape, south africa



Strategic Plan Evaluation 2012/13



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Analysis of 2010/11 - 2014/15 Strategic Plan & 2012/13 - 2014/15 Annual Performance Plan

Chief Directorate: Environmental Affairs

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

Nicholas Scarr

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Monitoring and Research Programme, Public Service Accountability Monitor

Key Findings and Recommendations

Finding 1

In 2012, driven by considerations emanating from the global climate change agenda, the Department 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 poses pressing questions about the status of the environmental function within the Department.

Finding 2

In line with its single strategic goal, the Department has also reduced its strategic objective complement to just five in number. One of these, viz. *carbon reduction and green economy initiatives*, which virtually embodies the strategic goal, is 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, and only one of Economic Development's 31, actually appear to be directed towards the achievement of the objective. Hence the objective finds little expression within the fabric of the Economic Development Programme, and none within Environmental Affairs. It obviously also fails to give effect to the much-heralded integration of the Programmes under the banner of the Department's low-carbon economy drive.

Finding 3

The marginality of the low-carbon drive at Programme level is affirmed by the fact that the *emission reduction* strategic objective, which appears to represent Environmental Affairs' contribution to the initiative, only attracts four of the Programme's 38 targets.

Finding 4

Only three annual targets have 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 are not linked to any of its strategic objectives. The targets do 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 implies that the revised strategic planning framework has not evolved organically, at least not for Environmental Affairs, but has rather been foisted upon it with little regard for the finer aspects of its *modus operandi*. This is an indictment of both top Departmental management and Environmental Affairs leadership, and entrenches a perception of an overwhelming economic development bias in the Department's strategic planning architecture.

Finding 5

The Department's low-carbon strategic planning weaknesses are underpinned by its climate change pronouncements, which appear 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.

Recommendations in relation to Findings 1-5

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

Finding 6

The distribution of programme performance indicators across Environmental Affairs' sub-programmes points to disconnectedness between its strategic planning and operational frameworks. This is 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.

Recommendation in relation to Finding 6

The restructuring process as alluded to in the Annual Performance Plan needs to take serious account of and respond appropriately to the constraints imposed on the environmental function by the Department's current structural model.

Scope of this Evaluation

In accordance with its title, this report focuses on the strategic and annual performance planning frameworks pertaining to the Chief Directorate: Environmental Affairs in the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism. This focus aligns with PSAM's specific interest in accountability for environmental governance in the Province. However, 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.

Policy priorities articulated in the Forewords to the Strategic Plan and Annual Performance Plan

The Strategic Plan was produced in March 2010. In accordance with the requirements of the Treasury *Framework for Strategic Plans and Annual Performance Plans*,¹ the *Foreword* to the Strategic Plan outlines seven strategic dimensions, which are premised upon the three key challenges identified in the Policy Speech delivered by the MEC for Economic Development, Environmental Affairs & Tourism for the 2009/10 financial year. The *Foreword* moreover indicates that these policy areas are directly aligned to two priority areas of national and provincial government, viz. work creation and sustainable livelihoods, on the one hand, and accelerated rural development on the other. It also states that the policy areas align with the *2010-2014 Medium Term Strategic Framework*, the *Provincial Growth and Development Plan*, the *National Spatial Development Perspective* and the *Economic Growth and Infrastructure cluster Programme of Action*.² However, the *Foreword* does not articulate how these elements are aligned - it simply states that they are.

In terms of the carry-through of these various policy priorities into the Annual Performance Plan (APP), which was generated in March 2012, its *Foreword* also articulates the seven strategic dimensions.³ At the same time, reference to the section of the APP which covers revisions to the Department's mandates reveals the addition of an eighth strategic dimension,⁴ but there is no mention of this in the *Foreword*. The APP *Foreword* likewise contains no mention of the *Outcomes Approach*⁵ adopted by the National Cabinet in January 2010, but the revised mandate indicates that DEDEAT has a responsibility to respond directly to four of the twelve Outcomes provided for in the *Approach*.

In endorsing the Strategic Plan, the APP *Foreword* singles out climate change and environmental crime as aspects of particular concern. It also indicates that the theme of the APP is one of *introducing new paradigms* and makes reference to "new" environmental challenges.⁶ The nature of these new challenges is not indicated,

¹ *Framework for Strategic Plans and Annual Performance Plans*, National Treasury, August 2010, p. 24.

² DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 1

³ DEDEAT 2012/13 *Annual Performance Plan*, p. 3.

⁴ *Ibid*, p. 3.

⁵ <http://www.poa.gov.za/Pages/LandingPage.aspx>

⁶ DEDEAT 2012/13 *Annual Performance Plan*, p. 1.

however, and a brief statement entitled *Sustainable Environmental Management*⁷ is limited to mention of aspects of the Department's recent performance within the environmental arena, and some of its future intentions.

The APP *Foreword* emphasizes that the Strategic Plan of 2010 has been updated, and outlines the single Departmental strategic goal formulated as a component of the update.

Vision, mission and values

Annexure One to the APP, which shows changes rendered to the Strategic Plan subsequent to its formulation, contains an amended Vision, as well as an amended Mission. The amendment to the Mission in particular is positive, in as much as environmental management is afforded equal weight with economic development, whereas the original version referred solely to a green economy. On the other hand, the (unchanged) Values in the Strategic Plan retain the accent on the green economy.

Legislative mandates

The mandate sources⁸ specified for Programme 3: Environmental Affairs in the Strategic Plan are a somewhat untidy affair. For instance, the list for the *Policy Coordination and Environmental Planning* Sub-Programme omits the National Environmental Management: Integrated Coastal Management Act, and includes two Policies (which are not the same as Legislation, and appear to be randomly selected, since the respective Policies underpinning the other listed statutes are excluded). Similarly, the *Ecosystems Biodiversity & Natural Heritage Management* Sub-Programme list includes the Fencing Act and the Veld and Forest Fire Act, the administration of neither of which is known to fall within the competencies of the Department. Attention should be afforded to improving the complexion of this mandate source, and statutes should be listed with their full and proper titles.

The only legislative mandate change reflected in Annexure One to the APP relates to the Eastern Cape Parks and Tourism Agency Act (Act 2 of 2010), which provides for the amalgamation of the Eastern Cape Parks Board and the Eastern Cape Tourism Board. This is of significance to Programme 3, which is responsible for monitoring and evaluating the work of the amalgamated Agency, as indicated in the *Programme Overview*⁹ contained in the APP. In line with this responsibility, departmental funding of the Agency is moreover channeled through Programme 3.

⁷ DEDEAT 2012/13 *Annual Performance Plan*, p. 2.

⁸ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, pp 11-12.

⁹ DEDEAT 2012/13 *Annual Performance Plan*, p. 49.

Policy Mandates articulated in the Strategic Plan

The matter of the Department's mandates has been alluded to in discussion of the Strategic Plan and APP *Forewords* above, as has the fact that the APP reflects revisions to the mandates originally articulated in the Strategic Plan.

The original Policy Mandate is drawn from the *Programme of Action of Government* and the *Provincial Growth and Development Plan*. Intended contributions and/or responsibilities are specified for fourteen policy directives emanating from these frameworks.¹⁰ Of the fourteen directives, only one, viz. *sustainable resource management and use*, which derives from the *Programme of Action of Government*, pertains directly to environmental governance.

Four intended contributions and/or responsibilities are listed for this directive, the most notable of which is the drafting of guidelines for the development and management of the Province's coastline. Optimism for this initiative is however tempered by the qualification that it will be *in support of, and linked to, existing spatial development and planning frameworks*. The outcomes of a drafting process conducted within these constraints are not likely to be particularly inspiring, since the formulation of the frameworks was obviously driven by criteria other than those of best coastal practice, and any authentic coastal planning exercise would of necessity have to have regard for the merits or otherwise of the frameworks.

Two of the other listed contributions and/or responsibilities are somewhat vague, these being "support" for *alternate energy production* (sic) and a "link with" the Expanded Public Works Programme. The fourth item entails the formulation of bio-cultural diversity conservation guidelines in relation to traditional and medicinal plant use.

At the same time, various contributions and/or responsibilities with an environmental complexion are specified for other policy directives. These span promotion of the green economy and the creation of green jobs, the promotion of cleaner technologies, infrastructure projects in provincial protected areas, ensuring the integration and expansion of protected areas with local communities (sic), the development, transformation and expansion of the hunting industry, the offering of educational opportunities for sustainable harvesting of "traditional medicine plants," support for the establishment of municipal waste infrastructure and the combating and reduction of environmental crime.

All-in-all, thirteen environmentally-aligned contributions and/or responsibilities are therefore provided for in relation to the Department's stipulated policy directives. What is however noteworthy is that only the last-mentioned, viz. the combating and reduction of environmental crime, can be characterized as an incisive intervention, using the legal powers vested in the State, to assert control in a situation where environmental disregard abounds. And even then, the intervention is extremely broad in nature, and is in fact constituted by a regular State environmental function, rather than having a specific focus within this field of responsibility. It can additionally be argued that this contribution should be complemented by others which are linked to the exercising of State power in relation to the environment. For example, the *sustainable resource*

¹⁰ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, pp. 13-14

management and use policy priority could and should embrace contributions such as enhancing the quality of permitting processes, with particular emphasis on the processing of applications for authorization under the NEMA Environmental Impact Assessment Regulations. A further focal area could be environmental disregard on the part of other organs of state.

Planned Policy initiatives

The Strategic Plan indicates that the Department *intends to achieve its targets by implementing its programmes under the seven strategic pillars*¹¹ (or dimensions) which are listed in its *Foreword*. It states further that each strategic pillar *will be guided by the elaboration of related policies*, but no further details are provided. The APP does however subsequently specify various activities to be undertaken within the context of the strategic pillars – see below with regard to revised policy mandates.

In any event, three of the strategic pillars pertain to the environmental sector, viz.

- management and protection of the natural environment;
- 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.

Revised Policy Mandates in the APP

While it is not mentioned in the *Foreword* to the APP, according to *Annexure One* the primary change in the mandate of the Department subsequent to its production of the Strategic Plan arises from the National Cabinet's *Outcomes Approach*. This change is of a supplementary nature, however, since the original contents of the mandate also remain in force.

The Annexure also notes that the Presidency requires all Departments to adjust their strategic plans to demonstrate alignment with the twelve key outcomes. After listing the outcomes (albeit with numbering errors for Outcomes 11 and 12), it is indicated that *over and above the general contribution to Outcome 12* the Department is mandated to respond directly to Outcomes 4, 6 and 10. 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*.¹² However, while linkages between the outcomes and the Department's policy and strategy choices may be implicit, no attempts are made to articulate such linkages.

The situation is analogous in Section 2 of the APP, which discusses the mandate revisions. A list of Outcomes 4, 6, 10 and 12 is followed by *a range of policy initiatives underway or planned to meet each of the identified Department's priorities*.¹³

¹¹ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 15.

¹² DEDEAT 2012/13 *Annual Performance Plan*, p. 67.

¹³ *Ibid*, p. 14.

Activities are listed within the context of the seven strategic dimensions referred to above. An eighth dimension is included, without explanation, as already noted. But again no account is provided of explicit linkages between any of these strategic dimensions and related activities, on the one hand, and the Outcomes on the other.

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*¹⁴. However, 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.

On the other hand, 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.

Implementation of Green Economy Guidelines for the Province, and support for economically beneficial environmental projects at a local level are activities identified under the policy initiative of *achieving a sustainable balance between economic growth and responsible use of land and natural resources*.¹⁵ The latter activity seems somewhat nebulous, while, as for the climate change intervention above, it is doubtful whether the former will make any serious inroads to addressing the unsatisfactory environmental *status quo* in the Province.

Finally, *enhancement of existing promotion, compliance and enforcement capability for both environmental and economic development (sic) and enhancement of partnerships with law enforcement agencies* are listed as activities underpinning the policy initiative aimed at *creating an enabling regulatory function that ensures legal and regulatory compliance*.¹⁶ The precise meaning of an enabling regulatory function is unclear, but nevertheless both activities are commendable in that they represent expansion of the Department's policy focus on environmental crime into the wider regulatory domain, in keeping with the argument for this in the discussion above of the policy mandates specified in the Strategic Plan.

Performance Environment Situational Analysis in the Strategic Plan

The introduction to the Performance Environment situation analysis contained in the Strategic Plan draws a somewhat simplistic linkage between drought conditions in the Province, the spread of invasive alien plants and catchment and biodiversity health. It is importantly acknowledged, however, that healthy natural systems which are well

¹⁴DEDEAT 2012/13 *Annual Performance Plan*, p. 14

¹⁵ *Ibid*, p. 15.

¹⁶ *Ibid*, p. 15.

protected and managed can mitigate drought impacts. The introduction goes on to state that *a ravaged natural environment will be among the most compelling factors*¹⁷ influencing the Department's work over the five year strategic planning period.

With regard to the environmental function, the analysis is characterized in terms of *receding indigenous and unspoilt areas*, which are attributed to *a combination of human settlement encroachment and climate change*.¹⁸ Critically, it is noted that *the extent to which the environmental protection mandate of the DEDEA and its entities is resourced, limits the province's ability to mitigate these threats effectively*.¹⁹ The resourcing issue is repeated when the environmental situation is viewed in terms of opportunities and threats. Other perceived threats are further damage to the public image of the Department if environmental attrition persists and the standards in provincial protected areas are not enhanced, and the negative impacts of continued destruction of the natural environment on the sustainability of human settlements and economic activity.

Credit is due to the Department for its open confrontation of the resourcing and public image issues. The matter of resourcing is vexing because while the Department can be assessed on its efforts to bring about enhanced resourcing, it obviously cannot be held accountable if solid effort in this regard does not result in significant resource enhancement. On the other hand, the Department can and will be assessed on the extent to which it optimizes the limited resources it does have at its disposal. This provides an added dimension to the matter of the Department's public image. It is contended that at the end of the day it will not be resourcing, but rather, at leadership level, the qualities of deep environmental insight and unwavering commitment to the achievement of meaningful environmental gains, which will shape a positive public image for the Department.

That said, opportunities identified in the analysis include that of demonstrating the feasibility of integrating progressive environmental management with responsible economic development, particularly in the eastern part of the Province, where the state of the environment is viewed as being conducive to this. Other perceived opportunities involve marine and aquaculture development, enhancing land-use planning capacity and coordination, the protection of bio-cultural diversity for the sustainable harvesting of traditional and medicinal plants and the extension of the Eastern Cape Parks Board's environmental protection responsibilities to areas outside of its parks.

The opportunity articulated for integrating environmental management and economic development represents a recurring theme throughout the Strategic Plan and APP. This has of course been a wellspring of immense opportunity since the formation of the Department, but picking up on the vein of honest analysis, it has to be said that it is one which has not been tapped into up until now. Much can be said about why this is the case, but suffice it to say here that it has essentially resulted from a lack of regard for environmental governance on the part of the Provincial Government as a whole,²⁰ while at the same time economic growth imperatives have occupied centre stage. Under-

¹⁷ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 18.

¹⁸ *Ibid*, p. 19.

¹⁹ *Ibid*, p. 20.

²⁰ DEDEAT *Budget Analysis 2012/2013*, Public Service Accountability Monitor, p. 5.

<http://www.psam.org.za/departement.php?output=1&did=9&year=2012-13>

resourcing of the environmental function is hardly surprising in these circumstances, but over and above this, the mismatch also gives rise to a corresponding bias towards the economic development function within DEDEAT.²¹ Hence the two functions are anything but equal, and the environmental function has effectively danced to the tune of the economists.

Set against these circumstances, the recognition now being afforded to the environment in the Department's strategic planning is refreshing. Presumably it is linked to the steady elevation of the environment as an issue of global concern. But of course the nature of the environmental challenge globally is one of discrepancy between rhetoric and action, and the dynamics of economic development are a potent factor in this discrepancy. Hence the spotlight in relation to DEDEAT's current efforts to marry these two disciplines will ultimately fall not on its rhetoric, but on the results of the marriage. In the interim, the cohesiveness of the chain linking the disciplines together through the various layers of the strategic planning process provides an indication of the marriage's prospects.

Updated Performance Environment Situational Analysis in the APP

The APP verifies that the situational analyses in the Strategic Plan remain valid, but notes that continuing threats to the environment necessitate further analysis. To the Department's credit, the language used in the opening paragraph of the updated environmental analysis conveys elements of urgency and seriousness which were not evident in the Strategic Plan.

Climate change appears to have been pivotal in raising the profile of the environment within the Department, but this is not clearly spelt out, and the analysis of the ramifications of climate change for the functioning of Programme 3 is inadequate. The opening paragraph of the update is entitled *Ecosystem destruction in the context of climate change*, and makes the welcome concession that *economic progress must be tempered by a consciousness of the impact of such progress on the environment*. It further offers a poetic quotation relating to the realization that, after all natural resources have been used up, "we cannot eat money."²² But thereafter it lapses into a rather routine account of scenarios pertaining to the various Environmental Affairs sub-programmes. These cover conservation statistics, international compliance enforcement-related organizations and events, repetition of the combined threat of human settlement encroachment and climate change, as noted in the Strategic Plan, and so on. Various statements of intent are also included, which are not really pertinent to a situational analysis.

Hence the update fails to add flesh to the bone of its bold introductory theme. It also sheds little light on the *new environmental challenges* referred to by the MEC in his foreword to the APP. In this sense, one's impression is that the primary environmental challenges which the Province faces are not new, but simply variations of the perennial challenge of an absence of incisive environmental governance. What are new, on the other hand, 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.

²¹ DEDEAT *Budget Analysis 2012/2013*, Public Service Accountability Monitor, p. 11.
<http://www.psam.org.za/departments.php?output=1&did=9&year=2012-13>

²² DEDEAT 2012/13 *Annual Performance Plan*, p. 9.

Over and above its introduction, another stand-out element of the update is perhaps the emphasis placed on the fact that environmental policy and regulation are as strong as their actual implementation. This dovetails with the calls elsewhere in this report for tightening up the administration of existing regulatory frameworks as a foundation for higher-level pursuits such as climate change and the green economy.

In relation to the latter, the analysis stresses the economic growth potential of the renewable energy sector, and speculates that it *promises to be the industrial sector that clearly demonstrates the possibility for economic expansion to take place in a manner respectful of the environment.*²³ Once again, it is hoped that this enthusiasm is complemented by action to improve the Department's performance of its environmental duties at a more basal level.

Organizational Environment Situational Analysis

In its outline of organizational weaknesses, the Strategic Plan notes a mismatch between the importance attached to the role of the Department and the relative resource allocation accompanying this role. Presumably this refers as much to the environmental function as it does to economic development, and if so, this accords with findings of the Programme 3 2012/13 budget analysis undertaken by PSAM.²⁴

It also refers to the fact that operational execution is "delegated" to regional offices and public entities, while the Head Office role is one of *planning, monitoring and evaluation.*²⁵ It is contended here that this dispensation does not serve Programme 3, which requires direct, centralized leadership, at sub-programme level, over its regional operations. At present, operations are 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.

In this regard, the updated Organizational Environment analysis in the APP refers to a restructuring process. In view of the delegation issue raised above it is trusted that serious consideration will be afforded to addressing the operational constraints imposed on Programme 3 by the Department's current structural model. In the interim it is reasonable to deduce a linkage between this model and the finding by the Auditor-General in the 2011/12 financial year to the effect that *Departmental systems and processes for the preparation and reporting of performance against predetermined objectives* are inadequate. In particular, it is noted in this finding that *sub-programme managers do not always submit the required reports and supporting documentation for reporting purposes.*²⁶ This should not be surprising in circumstances where sub-programme managers do not have control over operational personnel deployed within their sub-programmes. Further analysis in this report, specifically in relation to programme performance indicators, provides additional substantiation for the finding.

²³ DEDEAT 2012/13 *Annual Performance Plan*, p. 12..

²⁴ DEDEAT *Budget Analysis 2012/2013*, Public Service Accountability Monitor, p. 14.
<http://www.psam.org.za/departement.php?output=1&did=9&year=2012-13>

²⁵ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 22.

²⁶ *Report of the Auditor-General to the Eastern Cape Provincial Legislature* in DEDEAT 2011/12 *Annual Report*, p. 69.

Strategic Goals in the Strategic Plan

In setting strategic goals, the Strategic Plan indicated that the Situational Analysis had highlighted two distinct sets of priorities. The first set related to *provision of leadership, direction and support* while the second defined *the scope of delivery* for the planning period. Delivery priorities were deemed to fall into five strategic dimensions, one of which was *manage and protect the environment*²⁷ It is a bit peculiar that this is singled out as a priority, since it is in fact a non-negotiable, core departmental function.

In any case, four strategic goals were put forward as being fundamental to the Department addressing its priorities. Broadly, these related to

1. building a learning and responsive organization;
2. facilitating the work of regional offices and public entities falling under the Department;
3. improving and protecting relationships with external stakeholders, and
4. strengthening internal policies and processes.²⁸

The second strategic goal provided for the creation of, among others, *a solid regulatory framework*. This was the only element in the four goals with a clear link to the substance of the environmental function.

Strategic Goal in the APP

Deeper analysis of the strategic goals contained in the Strategic Plan is obviated by their subsequent replacement by one single goal, as articulated in the APP. This goal is termed *innovation for sustainable development*, and is underpinned by the following goal statement:

*By 2014, DEDEA will be recognized as an innovative professional organization which facilitates and regulates participation in a growing low-carbon provincial economy.*²⁹

Annexure One to the APP provides detailed justification for the shift to this single strategic goal. The intention behind the shift is described as being *to promote unity of purpose within the Department towards securing a sustainable future for the Province*. Economic development and environmental management are asserted to be *inherently integrated* in a low-carbon economy, which is stated as the desired future state of the provincial economy. A low-carbon economy is said to incorporate, by definition, *features and activities such as sustainability, climate change, green building, alternative energy, the environment, recycling, organic farming, even transportation*. Hence *the actual work done by the Environmental Affairs Programme* is said to be included within these activities, *thus moving the Province towards economically valuing environmental protection and management work*.

The justification notes further that a low-carbon economy allows promotion of *the notion that forward-looking energy and environmental policies directly contribute to economic*

²⁷ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 24.

²⁸ *Ibid*, pp. 25-26.

²⁹ DEDEAT 2012/13 *Annual Performance Plan*, p. 68.

growth. The fact that the Economic Development and Environmental Affairs Programmes both reside within the same Department is described as a *competitive advantage* which can be leveraged within the context of a low-carbon economy.³⁰

On the positive side, the justification is encouraging because it reinforces the enhanced focus on the environment in the Department's strategic planning effort, as referred to elsewhere in this report. On the other hand, notwithstanding the supposed mainstreaming of the "actual" environmental work done by the Department into the realms of the low-carbon economy, the fact of the matter is that the economy occupies centre-stage, and matters related to the environment have effectively been subsumed into it, rather than *vice versa*, or, at the very least, positioned on equal terms with economic matters.

In line with allusions elsewhere in this report, in its pursuit of a low-carbon economy, the Department appears to have lost sight of the inherent rationale for environmental protection, as articulated by, among others, the *Bill of Rights* in the country's Constitution.³¹ This does not bode well for the Chief Directorate: Environmental Affairs, whose primary mandate is the environment and not the economy. Indeed, in discharging this mandate, the Chief Directorate may at times be bound to assume positions which run contrary to perceived economic imperatives. This tension is both necessary and healthy, but the extent to which it can be maintained in an organization which articulates its overarching goal in terms of the economy has to be limited.

In these circumstances it is not surprising that a solitary reference to an environmental imperative in the justification literally appears lost within a laudatory account of the low-carbon economy. The simple statement that *the Department's compliance and enforcement efforts will need to be enhanced* is neither preceded by any introductory or contextual remarks, nor followed by any substantiation. It is also not complemented by any references to other environmental imperatives. Presumably it represents acknowledgement that low-carbon enthusiasm needs to be tempered by adherence to the basics of environmental protection, but the fact that it is expressed as minimally and awkwardly as it is points towards the acknowledgement constituting not much more than lip service.

At the end of the day, the wording of both the goal statement and its justification reflect that the Department, or at least its strategic planning drivers, perceive the organization as one whose primary role lies within the economic domain. This accords with the following statement in relation to leadership in the Department's Values, as outlined in the Strategic Plan:

*We accept responsibility to guide and direct the advancement of the Eastern Cape towards a Green Economy.*³²

³⁰ DEDEAT 2012/13 Annual Performance Plan, p. 69.

³¹ Constitution of the Republic of South Africa, 1996, Section 24.

³² DEDEAT Strategic Plan for the Fiscal Years 2010/11 – 2014/15, p. 8.

SMART analysis of the strategic goal statement in the APP

Notwithstanding the reservations already expressed in relation to the Department's single strategic goal, subsection of the goal statement to SMART analysis reveals the following:

- Recognition is the key component of the statement, and the statement is specific in indicating the kind of recognition the Department seeks, viz recognition as *an innovative professional organization which facilitates and regulates participation in a growing low-carbon provincial economy*. However, such recognition is the preserve of parties outside of the Department, and hence while the Department will obviously seek to influence these parties to afford it the recognition it desires through the specific activities of facilitating and regulating participation in a low-carbon economy, it in fact does not have ultimate control over whether or not it will be successful in achieving this recognition. In this sense the statement is flawed, despite its language being to all intents and purposes specific, and it should be amended to solely reflect aspirations which the Department can realize entirely by way of its own actions.
- The justification provided for the revised goal indicates that *successes will be measured in the economic participation rate of citizens, the range of low-carbon initiatives facilitated or supported by (the Department), and by the extent of the province's carbon footprint*.³³ The first and third of these indices are distinctly different from measuring the recognition which constitutes the primary aim of the goal statement. On the other hand, with regard to the second measurable, albeit that the Department might be successful in facilitating or supporting a wide range of low-carbon projects, the extent to which this would be equitable with it receiving the recognition it seeks is uncertain. Additionally, it is contended that the first and third indices are questionable from the perspective of their revealing unambiguous insights to progress with realization of the Department's goal by 2014. The level of measurability associated with the goal statement is therefore dubious.
- The Department has been credited in this report for confronting the matter of its public image, which by inference is not good. In these circumstances, coupled with the time it will take in order for the various interventions proposed in the Strategic Plan to bear fruit, assuming they are all effected, it has to be doubtful that the Department will achieve recognition as *an innovative and professional organization* by 2014.
- In line with comment offered thus far, it is believed that while the goal statement may be of considerable significance from an environmental perspective, in principle it is relevant primarily to economic development, and only secondarily to the environment.
- The only sense in which the goal statement clearly complies with SMART criteria is that it is time-bound. That said, the extent to which the specified timeframe will be met remains to be seen, as already alluded to.

³³ DEDEAT 2012/13 *Annual Performance Plan*, p. 68.

Relating expenditure trends to the strategic goal

The APP contains an overview of 2012/13 Departmental budget and MTEF estimates in accordance with the requirements of the Treasury *Framework for Strategic Plans and Annual Performance Plans*.³⁴ However, in two subsequent pages of text purportedly intended to relate expenditure trends to the strategic goal, it fails singularly to indicate how the budget and MTEF estimates contribute to realization of the goal. This suggests that the goal exists at a conceptual level only, and is yet to be properly contextualized within the Department's routine functioning.

Strategic objectives in the Strategic Plan

The Strategic Plan produced in 2010 provided for a total of 25 strategic objectives, distributed across the Department's Programmes as follows:

- Programme 1 (Administration): 7
- Programme 2 (Economic Development): 13
- Programme 3 (Environmental Affairs): 5

The five Environmental Affairs strategic objectives were structured around its five sub-programmes, i.e. each sub-programme effectively had its own strategic objective.

Strategic objectives in the APP

In the revised Strategic Plan as detailed in Annexure One to the APP, the 25 Departmental strategic objectives are reduced to just 5, these being

- SO 1 *Improve organizational performance;*
- SO 2 *Local economic participation;*
- SO 3 *Carbon reduction and green economy initiatives;*
- SO 4 *Emission reduction, and*
- SO 5 *Securing the provincial conservation status*³⁵.

Reference to Part B of the APP reveals that SO 1 pertains to Programme 1, SO 2 pertains to Programme 2, and SO 3 purportedly pertains to both Programmes 2 and 3, while SO's 4 and 5 are the domain of Programme 3.

Alignment between strategic objectives and strategic goal

At face value the strategic objectives appear to align with the Department's single strategic goal. SO 1 clearly relates to the Department's wish to be viewed as an innovative and professional organization, while the objective statement for SO 2 is concerned with facilitating participation in the provincial economy.

³⁴ *Framework for Strategic Plans and Annual Performance Plans*, National Treasury, August 2010, p. 34.

³⁵ DEDEAT 2012/13 *Annual Performance Plan*, p. 71.

The objective statement associated with SO 3 also accords with the goal statement, and is stated as follows:

*To increase activity related to a low-carbon and greener economy.*³⁶

If one accepts the assertion in the justification for the Department's strategic goal that a low-carbon economy "incorporates" the work performed under Programme 3, then SO 4 & SO 5 can additionally be viewed as being in alignment with the goal. Their respective objective statements are:

*To incrementally decrease the provincial carbon footprint (SO 4),*³⁷ and

*To improve the status of the natural environment of the Province (SO 5).*³⁸

If on the other hand one has reservations about the sweeping absorption of environmental matters into a low-carbon economy, then one will perceive disjuncture between the Department's single strategic goal and SO 4 and SO 5, since again, the goal is essentially economic in nature, while the character of these two objectives is, correctly, environmental.

Justifications and SMART analysis of strategic objectives

With regard to the justifications offered in the APP for the various strategic objectives, it is notable that *the threatened state of the environment* is put forward as a reason for improved organizational performance in accordance with SO 1.

The justification for SO 3 claims somewhat optimistically that the green economy offers opportunities to "resolve" pressing carbon emission and energy issues, but asserts that these opportunities are not being taken *due to a fragmented and ad-hoc approach to programmes and projects*. This is regarded as an over-simplification of deep-rooted realities which will require fundamental paradigm shifts to address. While the Department's intention to spearhead such shifts is commendable, one is left concerned that the painting of this simplified picture represents a serious lack of grasp of the scale of the challenges involved.

Further reference to the justification amplifies this concern. The baseline presented for SO 3 indicates that *there are no databases of technological applications to reduce carbon emissions (or of) low-carbon and green economy initiatives*. In response it is stated that *there is a need to consolidate existing data, and that this should be followed by monitoring and evaluation of the status and progress of green economy projects*. Information in this regard *should be centralized.....for use by the province and other stakeholders*. The justification goes on to assert that these initiatives will give rise to *a number of economic benefits*. One of these is that the Department will be *ideally placed to connect entrepreneurs developing green technology applications with companies wishing to reduce emissions and enter into the sustainable energy sector*. Secondly, *DEDEAT will be able to reward, support and stimulate activities, innovation and research*

³⁶ DEDEAT 2012/13 Annual Performance Plan, p. 50.

³⁷ *Ibid*, p. 51.

³⁸ *Ibid*, p. 75.

*in the green economy, renewable energy and energy efficiency sector. Lastly, linkages between economic sectors can be facilitated.*³⁹

It has to be said that this comes across as a distinctly modest set of activities and benefits when it is viewed against the opportunities the green economy is proclaimed to offer for resolving crucial carbon and energy challenges. This lack of incisiveness is complemented by the objective statement's deficiencies from a SMART perspective. *To increase activity related to a low-carbon and greener economy* is unspecific in that the term "activity" can have any number of meanings here. This deficiency impacts on the measurability of the objective, and is compounded by the absence of baseline data. In these circumstances the achievability of SO 3 has to be dubious. At the same time, in accordance with the comment offered on the Department's strategic goal, while increased green economic activity may be of considerable significance to Programme 3, its primary relevance lies within the economic development domain. Finally, the objective statement has no timeframes associated with it.

Much of the same can be said for SO 4. *To incrementally decrease the provincial carbon footprint* is not specific in as much as no indication is provided of the scale of the envisaged increments. At the same time the province's carbon footprint has not been measured, and while it is claimed that its greenhouse gas inventory can serve as a proxy indicator "if necessary," this is still *in the process of being measured / calculated*.⁴⁰ Hence the measurability aspect of this objective is also not entirely convincing. All told, therefore, SO 4's achievability is doubtful, while its relevance is diminished by the contextual issues raised below. As with SO 3, no timeframes have been specified for it.

Be all of this as it may, of greater concern is the singling out, from the multitude of operational challenges facing Programme 3, of emission reduction as an area deserving of special attention in accordance with the Department's new-found fervor for a low-carbon economy. The imperative to effect such reduction is obviously not disputed, but in line with previous comment, this is likely to be achieved only after concerted action on a number of fronts to bring about a fundamental shift in the consciousness of both the general public and the state. And again, any attempt by the Department to position itself as a champion of this new consciousness can only be persuasive if Programme 3 consistently performs its routine environmental functions, across all sub-programmes, with accomplishment. Unless and until it does so, its pronouncements in relation to emission reduction will ring hollow.

Further to this, the rationale articulated in support of SO 4 reinforces reservations about the Department having all bases covered in its drive to effect a much-needed shift in the Province's consciousness. Its justification offers a few basic statistics in relation to the lifestyles of the Province's population, and makes various elementary scientific statements about climate change, before abruptly leaping to the deduction that *by creating awareness of the issues, providing guidance on simple, affordable mitigation initiatives, and effectively regulating activity that may harm the environment, DEDEAT will directly contribute to the reduction of the provincial carbon footprint*. This is surely both simplistic and wishful, and as is the case with SO 3, the substance of the objective appears pale in comparison with its noble intent.

³⁹ DEDEAT 2012/13 Annual Performance Plan, p. 50.

⁴⁰ *Ibid*, p. 51.

SO 5 appears to have been erroneously omitted from Programme 3's account in the APP, but is nevertheless accessible by virtue of its inclusion in Annexure One, along with other components of the revised Strategic Plan. In keeping with SO 3 and SO 4 it also has weaknesses from a SMART perspective. *To improve the status of the natural environment of the Province* is an extremely vague and non-specific statement. At the same time its measurement by way of endangered species and ecosystems data as reflected in the *state of the environment report*⁴¹ is questionable, since this narrow conservation perspective does not necessarily provide a comprehensive picture of the overall state of the Province's natural environment. This aside, the broadness of the objective, together with the number of factors involved in shaping the status of the natural environment, not least of which is the quality of environmental governance in the province, have to limit the chances that it will be achieved. In principle its relevance is obviously unquestionable, but in practice it is compromised by the context and manner in which it is framed. And like SO 3 and SO 4 it has been formulated without an accompanying timeframe.

The justification provided for this objective is arguably even less convincing than those associated with SO 3 and SO 4, and consists of little more than an assemblage of basic statements relating to environmental attrition in general, followed by the observation that *it is incumbent on this generation to conserve what is left of the natural environment, to ensure the future of the planet.*⁴²

Given its role as lead agent for environmental affairs in the Province, the Department legitimately can and should strive to exercise leadership *to ensure the future of the planet*. Furthermore, if this can be brought to dovetail with a low-carbon economic agenda by virtue of the so-called competitive advantage offered by the Department also being the lead agent for economic affairs, all the better. But once again, the fact of the matter is that the Department's legitimacy is weak at this point, as a result of a provincial environmental scenario which constitutes the antithesis of the grand design articulated in its strategic planning frameworks.

The Province is wracked with a host of environmental maladies, including but not remotely limited to attrition of virgin ground and vegetation, including forest decimation, coastal landscape transformation, inadequate waste management, and the open anarchy associated with poaching syndicates. It is acknowledged that not all of these scourges are the direct responsibility of the Department, in as much as national government also has environmental operational mandates in the Province. But strong leadership at provincial level entails championing action to address these challenges as a whole, and presenting a consolidated picture of a province where the environmental factor is in hand. From this platform the Department could convincingly chart a pathway towards an era where the essential *modus operandi* of the Province has shifted to one which is in tune with the global environmental agenda. But until such time as it attains this platform, if it does, its strategic planning approach should be more moderate, and focus on systematic reinforcement of the foundational aspects of its environmental work.

⁴¹ DEDEAT 2012/13 Annual Performance Plan, p. 75.

⁴² *Ibid.*

Structural and conceptual aspects of strategic objective annual targets and programme performance indicators

The Treasury *Framework* specifies that each objective must set a performance target which can be achieved by the end of the strategic planning period.⁴³ This format has not been followed in the case of Programmes 2 and 3, both of which have set a number of targets (31 and 38 respectively) which pertain to their objectives as a group. Accordingly Programme 3's 38 targets have been specified for SO 3, SO 4 and SO 5 combined, which at face value points towards disconnectedness between the objectives and the Programme's functioning.

Appraisal of Programme 3's annual targets affirms this impression - not one of the 38 targets can be directly linked with SO 3. This weakens substantially the already tenuous concept the Department has of itself as champion of both the economy and the environment. At the same time it obviously also undermines the Department's self-proclaimed competitive advantage, as well as its presentation of SO 3 as being common to both Programmes 2 and 3.

In this regard, investigation of Programme 2's relationship with SO 3 is also revealing. One of two stated purposes of Sub-programme 2.2 (*Trade and Industry Development*) is *to create an enabling environment for the sustainable growth and development of the green economy*.⁴⁴ However, reference to Programme 2's annual targets (specified jointly for SO 2 and SO 3 as alluded to above) indicates that only one of 31 targets shows any obvious linkage to SO 3. This effectively means that while SO 3 virtually embodies the Department's single strategic goal, and purportedly represents the much-heralded cross-over of Programmes 2 and 3, it musters only one single annual target (from within the economic development sector) out of the total complement of 69 specified for the two Programmes.

Similarly SO 4, which like SO 3 is also a flagship for the Department's low-carbon goal, only attracts 4 annual targets within Programme 3. 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, account for no more than 10,5% of the programme's annual targets.

Hence it appears that at this stage the integration of the Department's economic and environmental functions finds little expression within the inner fabric of either Programme 2 or 3. As far as Programme 3 is concerned, given the multiplicity of mandates it already struggles to discharge without the superimposition on top of them of energy, climate change and economic challenges, this is hardly surprising.

In the circumstances it would seem that on the back of COP 17 the top echelons of Departmental management have grasped the climate change nettle, but have done so with little appreciation of the burdens already borne by Programme 3. This may also suggest that Programme 3 management has failed to adequately enlighten this echelon as to the realities of its pre-existing mandate. Ultimately, if this is the case some 16

⁴³ *Framework for Strategic Plans and Annual Performance Plans*, National Treasury, August 2010, p. 14.

⁴⁴ DEDEAT 2012/13 *Annual Performance Plan*, p. 36.

years into the Department's lifespan, it reinforces fundamental questions about the twinning of the economic development and environmental affairs functions in the same organization. Indeed, when seen from these perspectives, the Department's entire current strategic thrust seems to stand on shaky ground. The fact that Programme 2 has failed to include the green aspect of economic development into its strategic planning framework to any notable degree further substantiates this point of view.

The perception that the Department is founded on a strategically flawed base is heightened by further scrutiny of Programme 3's annual targets. If only four of them link with SO 3 and SO 4, this implies that the other 34 must link with SO 5. However this is not the case at all, with a mere three targets falling under the auspices of this particular objective. Hence, incredibly, with only 7 targets being directly attributable to SO 3, SO 4 and SO 5, a total of 31 out of 38, or 82%, of Programme 3's targets cannot be ascribed to any of its strategic objectives.

Insight to this state of affairs can be gleaned from an appraisal of Programme 3's performance indicators. At the outset, it must be noted that at individual indicator level, their substantive content mirrors that of the annual targets specified for Programme 3. A crucial difference between the indicators and annual targets as suites, however, is that the former are structured according to the Chief Directorate's sub-programmes, while the latter, at least in name, are purportedly grouped according to strategic objectives. This is discernible by reference to the tables denoting, respectively, *strategic objective annual targets*⁴⁵ and, *programme performance indicators and annual targets*,⁴⁶ in the APP. But the point is that whether one refers to them as targets or performance indicators, the substance of these components of Programme 3's strategic plan clearly aligns with its sub-programmes, and not with its strategic objectives.

Hence it becomes obvious why the three Programme 3 strategic objectives are structured as a unit for target specification purposes: the real-life functioning of Programme 3 simply does not align, at least not in present circumstances, with the strategic goal and objective framework which has been adopted by the Department. This implies 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.

Hence the unavoidable impression is 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 this has come to pass again points towards an overwhelming economic development bias in the Department's strategic planning architecture, and further indicts both top management and Programme 3 leadership.

At the end of the day this disjuncture appears to be a crowning manifestation of the inherent mismatch between the two core Departmental functions, and as such, portrayals of the union as fortuitous appear to be seriously misguided. The deeper one interrogates the Department's supposed strategic shift in favor of the environment, the more it appears to be largely cosmetic at this stage. And in this regard, the fact that

⁴⁵ DEDEAT 2012/13 Annual Performance Plan, p. 52.

⁴⁶ *Ibid* p. 55.

environmental management in the Province resides under a Department which appears to be at odds with itself does not bode well for the environment.

Substantive aspects of programme performance indicators

It is reiterated that the content of Programme 3's targets and performance indicators⁴⁷ is identical. Over and above the conceptual and structural implications of both the targets and indicators as discussed above, issues need to be highlighted in relation to the use of this content for indicatory purposes.

In the first instance, the variables at the centers of indicators 3.7 – 3.9, 3.11, 3.12, 3.16, 3.31 and 3.32 are controlled by externalities and not the Department. In this regard these indicators are open to the same criticism as that directed at the Department's strategic goal statement. Specifically in relation to this class of indicators, for example, the number of enforcement actions undertaken or the number of permits issued depends on the number of infractions which occur and come to the Department's attention, and the number of permit applications received, respectively. The specification of target numbers of this nature is therefore flawed, and indicators would be more meaningful if they were based, say, on successful enforcement action rates or the completion of permitting processes within prescribed or self-imposed timeframes. In the latter sense, indicator 3.35, viz. *the number of coastal management applications finalized within guideline timeframes and meeting legal requirements* (sic) is in principle sound, notwithstanding imperfections in relation to its terminology – responses to applications, and not applications themselves, are finalized, while the reference to legal requirements is vague. Besides which, Departmental adherence to legal requirements is clearly neither negotiable nor can it justifiably constitute part of an indicator.

Terminology criticism can also be leveled in respect of indicators 3.13 and 3.14: while air quality and waste management *tools* may well be used in the implementation of initiatives within these respective disciplines, the tools themselves are not implemented, as stated. On the other hand, 3.15 asks a question – *is there a gazetted biodiversity conservation plan* (without a question mark), while 3.30 simply makes a statement – *status of ecosystems and species* – and then somehow conjures up number targets for the 2012/13 to 2014/15 financial years. Equally, although 3.36 is framed as a statement – *compliance with service level agreements by public entities* - it also appears to be a question, to be answered with a simple yes or no like 3.15. This notwithstanding the percentage score attributed to it. And in any case, it is understood that Programme 3 will only be party to a single annual service level agreement, this being with the Eastern Cape Parks and Tourism Authority, so the specification of this indicator seems incongruous.

Finally, indicator 3.29 is anomalous in that although the justification for SO 4 indicates that the provincial greenhouse gas inventory *is in the process of being measured/calculated*, a target number is specified for it for 2012/13, and repeated for the following two financial years.⁴⁸ So it would seem that the inventory has in fact been determined, notwithstanding the statement to the contrary in the justification, and one has to presume that the static target reflects an intention to maintain it at a zero growth

⁴⁷ DEDEAT 2012/13 Annual Performance Plan, pp. 55-58.

⁴⁸ *Ibid*, p. 51.

rate. But here too, the adequacy of the target is undermined by the risk posed by externalities.

The inadequacies already noted provide a pointer to the SMART profile of the targets and indicators as a whole. While they are a mixed bag, the poor quality elements within them reduce their overall specificity and measurability complexion to one of poor. They are likely to generally be achievable, but because at the same time they are not overly ambitious, this does little to enhance their ranking. Anomalies in their distributions across Programme 3, as discussed below, pose serious questions about their relevance as a suite, albeit that the relevance of many of them at an individual level is unquestionable. All have timeframes attached to them by virtue of their alignment with annual (and quarterly) planning.

Distribution of programme performance indicators across Programme 3

Programme 3's performance indicators are grouped by sub-programme in the following ratio:

- Sub-programme 1 (Policy Coordination and Environmental Planning): 6
- Sub-programme 2 (Compliance and Enforcement): 7
- Sub-programme 3 (Environmental Quality Management): 4
- Sub-programme 4 (Biodiversity Management): 9
- Sub-programme 5 (Environmental Empowerment Services): 12

Discrepancies in the distribution of indicators across the Programme are immediately obvious. In particular, the linkage of 12 of the 38 indicators (3.17 - 3.26, 3.37 and 3.38) to Sub-programme 5 (*Environmental Empowerment Services*) is puzzling. Over the medium term expenditure framework this sub-programme will receive budget allocations of the order of or less than 50% of those directed towards the other four sub-programmes.⁴⁹ Therefore roughly speaking, and excluding the portion of Sub-programme 4's allocation which will be transferred to the Parks and Tourism Authority, a sub-programme which receives no more than 11% of the programme budget accounts for 32% of its performance indicators.

On the other hand, the assignment of only four indicators to Sub-programme 3 (*Environmental Quality Management*) is inexplicable, given that this unit is responsible not only for the environmental impact management function, but also for air quality management (including emission reduction, which is the sole object of SO 4), waste management and climate change response and mitigation. Further scrutiny in fact reveals that only one of these four indicators relates to environmental impact management, a function which plays an inordinate role in determining the state of the province's environment.

These extremes suggest an element of randomness in Programme 3's indicator identification processes, which in turn points to disjuncture between its strategic planning and operational paradigms. This is not surprising given the imperfections of the Departmental structural model as discussed previously in relation to the organizational situation analysis. Since sub-programme managers are not able to exercise operational

⁴⁹DEDEAT 2012/13 *Annual Performance Plan*, p. 62.

leadership within their respective disciplines, they are not in continuous, direct contact with operational personnel. In these circumstances, intra-discipline strategic planning and management on the one hand, and operations on the other, will not continuously inform each other to the extent which they should, and will perpetually occur in relative isolation of each other. Anomalies such as those posed by the distribution of performance indicators across Sub-programmes 4 and 5 should therefore not be unexpected. They also resonate with the Auditor-General's identification of sub-programme management as being a problematic level from a Departmental performance management perspective.

This situation will be compounded by both the nature of the environmental function, and the role played by externalities in determining the state of play within it. It is a fact that a significant proportion of Programme 3's work is reactive in nature, and cannot be planned. And given the generally unsound state of environmental governance in the Province, coupled with the inter-related under-resourcing of the Department, both as referred to elsewhere in this report, operational personnel will tend to be hard-pressed to meet the demands of their mandates. Where this is the case, strategic planning may become at best incidental to, and at worst, an unwelcome distraction from, or even hindrance to, routine work. This is all the more reason why it should come as no surprise that there are flaws in the finer detail of the Programme's strategic planning framework.

Miscellaneous aspects of the Strategic Plan and APP

In concluding this analysis, the following observations are recorded:

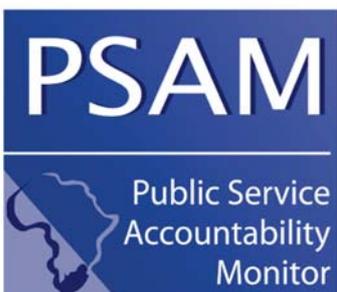
- The Strategic Plan deals with Programme 3 *resource considerations*⁵⁰ as required by the Treasury *Framework*, but only at the most elementary level.
- The Programme 3 strategic objective *risk management* provisions were formulated in terms of the original, sub-programme based objectives in the Strategic Plan,⁵¹ and appear to have been "lost" in the course of these objectives being replaced by SO 3, SO 4 and SO 5 in the APP.

⁵⁰ DEDEAT *Strategic Plan for the Fiscal Years 2010/11 – 2014/15*, p. 50.

⁵¹ *Ibid*, p. 51.



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