



SUBMISSION TO THE PARLIAMENTARY SELECT COMMITTEE

**ON THE CONSIDERATION
OF THE 2022 ANNUAL PROGRESS REPORT (APR)**

**ON THE
IMPLEMENTATION OF THE EIGHTH NATIONAL DEVELOPMENT PLAN.**

**SUBMITTED BY: ZAMBIA CLIMATE CHANGE NETWORK
AND PARTNERS.**

**SUBMITTED ON
28TH JUNE 2023**

1. INTRODUCTION

Chairperson and Honorable Members of the Committee,

This submission is being made jointly by the Zambia Climate Change Network (ZCCN) members and its partners namely: ActionAid Zambia/ Global Platform, Civil Society for Poverty Reduction (CSPR), Center for Environmental Justice (CEJ), Green Living Movement (GLM), FIAN International Zambia, Levy Mwanawasa Medical University-School of Public and Environmental Health, Save the Children International (SCI) Zambia Office, and the World-Wide Fund for nature (WWF) Zambia Country Office.

ZCCN is a recognized civil society organisation in the country and works closely with the Ministry of Green Economy and Environment (MGEE). Our organisation was the lead CSO during the development of the 8th NDP and is also Co-Chair on the Cluster Advisory Group for the Environmental Sustainability pillar. ZCCN is a membership - based national platform whose strategic thrust is on climate justice and sustainable development in Zambia. We are affiliated to the Pan-African Climate Justice Alliance that is an umbrella organization for Non-Governmental Organizations in Africa, with representation in fifty-one (51) African countries. The ZCCN secretariat is established at the Mulungushi International Conference Center (MICC), New Wing.

2. BACKGROUND

This submission is based on the review of Strategic Development Area 3: Environmental Sustainability, and specifically on Development Outcome 1: Enhanced Mitigation and Adaptation to Climate Change; and Development Outcome 2: Sustainable Environment and Natural Resources Management.

Hon. Chairperson, we note that the Eighth National Development Plan (8NDP) sets out Zambia's strategic direction, development priorities and implementation strategies for the period 2022 to 2026. This Plan is a successor to the Seventh National Development Plan (7NDP) that was

implemented over the period 2017 to 2021 and was the fourth in the series of National Development Plans (NDPs) towards the attainment of the National Vision 2030 where Zambians aspire to live in a prosperous middle-income nation. Zambia's vision of attaining a prosperous middle-income status by 2030 emphasises development that is anchored on sustainable environment and natural resource management principles. This means attainment of socio-economic development which meets the needs of the current generation without compromising the ability of future generations to meet their own needs.

3. SITUATIONAL ANALYSIS

The report under review looks at activities undertaken in 2022. During this period, the country was in the process of putting in place the Climate Change Bill, review of the Climate Change Policy, and the Amendment of the Zambia Environmental Management Act of 2011. These processes were being undertaken at a time of continued environmental challenges such as deforestation, land use change, unsustainable waste generation and management, as well as water, air and soil pollution.

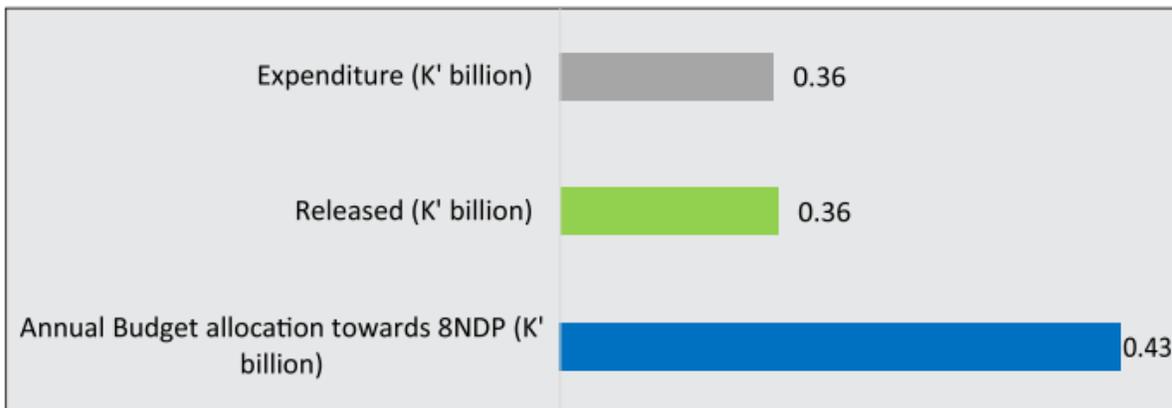
It is therefore important that the Environmental Sustainability Pillar is reviewed in consideration of financial and necessary capacities needed to ensure that the implementation of the 8th NDP is achieved with the participation of all stakeholders from the government institutions, private sector, and the civil society organisations.

4. KEY ISSUES AND RECOMMENDATIONS

4.0 Budget Performance

We, the Civil Society Organizations note that the allocation to Environmental Sustainability had the lowest allocation for the 2022 budget which amounted to K344,199,712.55 or 0.4% of the budget.

Figure 3.5: Environmental Sustainability Overall Budget Performance (K' billion), 2022



Source: Environmental Sustainability Cluster Advisory Group

This therefore implied that the government did not attach great value to programming and implementation for environmental sustainability despite the known negative social and economic impacts including the impact of climate change on various sectors.

Despite the impressive expenditure of 99% on funds releases for the sector, the low level of funds allocated resulted in only 50% of the targeted Programmes being implemented.

We therefore recommend to this Committee that in future the budget allocation to this pillar is increased to at least 5 % if meaningful impact is to be made as the environmental sector is critical for human and social development as well.

4.1 Outcome 1: Enhanced Mitigation and Adaptation to Climate Change.

Chairperson, the following are our submissions under this outcome.

Strategy 1: Strengthen Climate Change Adaptation.

Regarding the development of a monitoring, evaluation and reporting framework on climate change adaptation, the report states that the non-achievement of this target was a result of inadequate financial resources to finalize the framework. Furthermore, the report indicates that only a draft Monitoring, Evaluation, Reporting, and Learning (MEL) framework was developed during the period under review.

We further note with concern that the APR 2022 has been done without the MEL framework which is aimed at informing on progress per indicator. We urge the government to speed up the process of finalizing the MEL framework to provide accurate and representative data informed by the indicator framework. The MEL framework will help MGEE identify improvements necessary for strengthening climate change adaptation for the future.

The implementation plan indicates that 100,000 farmers were to be trained in climate smart agriculture (CSA). The reports indicates that, 101,135 farmers were trained in climate smart agriculture against the targeted 40,000 farmers. This performance was attributed to timely funding, support from Cooperating Partners, and increased collaboration with private sector especially Seed companies.

We note with concern on the validity of the results when the implementation plan target was to train a 100, 000 farmers. However, the report indicates that 101,135 were trained against **40,000**. It is also our observation that, the exact Districts or Provinces where the training was delivered to the farmers was not provided, and the report should provide specific details on the type of training offered. Consequently, ZCCN and its partners strongly urge the government to reconsider the methodology and reporting approach, as the reported results do not align with the figures stated in the report. Therefore, the APR 2022 should accurately depict the planned objectives and compare them to the actual achievements in order to assess the progress made.

Regarding increasing area under Conservation Agriculture, the report states that 350,000 hectares of land was brought under conservation Agriculture against the target of 300,000. This was attributed to the trainings and sensitization meetings on Conservation Agriculture which were conducted during the year under review. The implementation plan shows that 340 hectares was planned to come under conservation agriculture. However, the results show a positive trend as the results were beyond the 340 targets. We commend the government on preserving 350 ha

that were brought under conservation which is a good trajectory on ensuring environmental sustainability.

On Climate Smart Agriculture (CSA) that focused to promote and commercialize the practice, 101,135 farmers were trained in climate smart agriculture against the targeted 40,000 farmers. Despite the efforts of the civil society organisations and FAO on promoting CSA, the lack of support from the government and continuous funding on FISP has been a drawback every year. We urge the government to develop a deliberate climate smart agriculture and Agroecology strategy and include it in training curriculums. It is our submission that government must provide incentives for CSA/ Organic/ Agroecology farmers.

According to the 2022 annual report, the target to develop and commercialize 16 climate smart technologies were met and was exceeded as 20 climate smart technologies were developed and commercialized. This statement contradicts the implementation plan. The plan explains that 12 climate smart technologies were to be developed and commercialized from 2022 to 2026. For 2022, 2 climate smart technologies were to be developed and commercialized. In 2022, the report indicates that 20 were developed and commercialized against 16 and these have not been specified. The report should have stated what type of technologies were developed and for which areas.

On the number of drought resilient crop varieties developed with respect to the Programme output; to develop drought resilient crop varieties, a total of 16 drought resilient crop varieties were developed, surpassing the target of 12. The 12 drought resilient crop varieties were to be developed from 2022 to 2026. Two (2) were to be developed in 2022. The report indicates that 16 were developed. This was a great achievement but there is a need to enhance the distribution of the developed crop varieties to farmers.

On hectares of pasture planted, the target of 4399 (2000 in quarter 1 and 2399 in quarter 4) hectares of pasture planted was not met. We are concerned that the report does not indicate why this target was not achieved.

Regarding the quantity of certified climate-resilient crop varieties (in metric tons), the progress report states that the target for certifying 100,000MT of such crop seed varieties in 2022 was not achieved, as only 65,000MT were certified. It is important to note that the National Implementation target for 2022 was set at 3871.0MT. These figures clearly demonstrate that the target was not met, indicating a requirement for additional funding allocation.

According to the report under economic transformation and Job creation, the target to characterize one (1) indigenous livestock specie was met and exceeded. The report shows that two (2) livestock species were characterized, and these were chicken and cattle. The livestock characterization which was aimed at promoting and conserving the local breeds was undertaken in all the three (3) agro-ecological zones. The local cattle breeds characterized included the Angoni in Eastern and Northern parts, Tonga in Southern and Central, and Barotse in Western provinces. The performance was attributed to cooperation from farmers in providing the information pertaining to the breed, size and adaptability in accordance with the climatic region as well as support from Cooperating Partners in supplementation of resources.

According to the 2018 Livestock and Aquaculture Census, the population of ruminant livestock consisted of 3.7 million cattle, 3.5 million goats, 170 thousand sheep, 1.1 million pigs, and 15 million village chickens. It is important to note that there is a pressing need to further characterize livestock to mitigate the climate impacts. Therefore, we strongly recommend to the government and the Ministry of Livestock and Fisheries to prioritize the breeding and promotion of indigenous livestock breeds that demonstrate resilience to climate change.

The implementation plan reveals that the target was to construct four (4) climate-resilient livestock infrastructures. However, the report on page 60 shows that six (6) biodigesters were

constructed in Nakonde, Chinsali, Mbala, and Kasama Districts, exceeding the target by 50 percent. Further, the report attributes this achievement to availability of construction materials, financial and technical support from cooperating partners. We note that the plan to construct climate resilient livestock infrastructure was not achieved as these results of biodigesters are misleading because the biodigesters are aimed at addressing energy and not climate resilient livestock infrastructure. We note that, what constitutes climate resilient livestock infrastructure should be related to livestock infrastructure such as dip tanks, livestock veterinary institutes etc.

Strategy 2: Strengthen Climate Change Mitigation.

The plan shows that 85 % of (EIA's) were planned to be reviewed. The APR shows that only 28 percent were reviewed and decided upon. Furthermore, the report shows that the performance was due to the absence of the Zambia Environmental Management Agency Board between June and September 2022. Measures must be put in place through amendment of the ZEMA Act of 2011 and other policy instruments to ensure efficient operations in the absence of the Board.

The target to produce two (2) National Greenhouse Gas Inventory reports was not met. As the CSO consortium, we note that this APR 2022 indicates that the target to produce these reports during the period under review was also not achieved. The target was to be implemented under a project scheduled to commence in 2023. We recommend that activities need to be budgeted for in the National budget as the dependence on project funds is unsustainable.

The 8NDP implementation plan shows that there were 8 awareness programs planned on sustainable agriculture promotion. We note that no targets are indicated under the 2022 APR. There is therefore a need for consistency in reporting so as not to mislead stakeholders.

Strategy 3: Enhance Disaster Risk Reduction and Response.

The target to procure and install 100 Automatic Weather Stations was not met. The plan was to install 4 manual Weather Stations. We note in the APR 2022 that 32 Automatic Weather Stations were procured and installed. The performance was attributed to delayed procurement

processes. Similarly, the target to install eight (8) manual weather stations was not met due to unavailability of funds. It is worth noting that adequate resources should be allocated under the national budget, considering the significance of weather information in effectively managing climate variability for farmers and other stakeholders. Regarding the procurement and installation of 300 Rainfall Stations the target was met as all the rainfall stations were procured and installed.

With respect to the target to conduct two (2) awareness campaigns to promote resilience of water resources to climate change, we note that only one (1) online awareness campaign was undertaken. The campaign was aimed at sensitizing the catchment officers on ambient water quality standards as well as the impact of toxic waste chemicals on the environment and climate.

Furthermore, the plan initially aimed to relocate 120 internally displaced households. However, the target was surpassed, with a total of 450 internally displaced households successfully relocated. A total of 21 critical infrastructure was rehabilitated and constructed against the target of 25. Furthermore, 1,575 tents were distributed across the 10 Provinces against the target to distribute 2,000 tents. The target was not achieved due to inadequate budgetary allocation.

Development Outcome 2: Sustainable Environment and Natural Resource Management.

Strategy 1: Promote Integrated Environmental Management.

a) Pollution Prevention and Control.

Chair, it is concerning to note that only 1 out of 15 studies for ambient air, soil and water quality were undertaken in the period under review and this was attributed to inadequate financial resources. We note that the Implementation Plan target was to reduce pollutants to improve air quality from 38 PM to 30 PM by 2023. This situation might lead to further deterioration of air, soil and water quality from the baseline of 38 PM recorded in 2019. Further, we are concerned that there is no baseline in the final draft of the National Implementation Plan for 8NDP on Water quality Index which is linked to the failure to conduct the planned 15 studies mentioned above.

The situation was reported in the progress report that less than 1% out of the targeted 5% solid waste was collected and recycled due to inadequate tracking systems. Our observation is that waste management has continued to be a challenge for almost all districts in Zambia and this will seriously impact negatively on environmental and public health as well as Zambia's progress in attaining its Nationally Determined Contributions.

With regard to capacity building and environmental awareness, we are concerned that the reported achievements are low, specifically 5 TV and 8 Radio programmes are inadequate to spur public dialogue and conversations that lead to behavioral change and action for environmental protection. Unfortunately, the activities under this section are not included in the Final Draft National Implementation Plan for 8NDP.

The report indicated that the target for identifying, mapping, and updating pollution hot spot areas was met. The annual progress report attributed this success to the timely availability of resources, which can serve as a valuable learning point for other programs.

Regarding Environment Assessments reviewed, we note that out of the submitted Environmental Impact Assessments (EIAs), 28% out of 85% planned EIAs were reviewed, which accounts for 85% of the total submissions. The low target was attributed to the absence of the ZEMA board at the time. There is need to ensure that activities continue in the absence of board members by having provisions in the ZEMA Act or in the policy.

b) Chemical and Waste Management

We note that the reported reduction in the consumption of Ozone Depleting Substances was a good development, however the attribution of this achievement is not clear as the activities implemented to reduce consumption are not mentioned in the report and these are not also highlighted in the Draft National Implementation Plan (NIP) of 2023. Our concern is that the omission of the targets in the NIP may result in failure to track progress being made.

A major concern is that the target to phase down Hazardous Pesticides by 50% was not met at all. Another concern is that the target to increase to 30% the amount of electrical waste to be collected and recycled did not have data. Based on this report, this shows that waste management is not given the full attention that it requires in terms of investments to this sector.

c) Environmental Compliance and Tracking.

The report is not clear as to what is the actual number of facilities that were targeted for compliance and whether they were public or private facilities. The report indicates that with regard to increased Compliance to Environmental Standards 55% out of 75% planned environmental standards were met. The low attainment was attributed to inadequate funding and there is need to ensure informed analysis is done for responsive budgeting.

On the development of an Integrated Monitoring Reporting and Verification System (IMRVS), this was attained, despite its development, the system is pending launch and operationalization. We recommend that the launch and operationalization of the plan should be expediated.

d) Environmental Services Valuation

The report shows that this activity did not take place and that targets were not set for the year under review. We recommend that this should be included in the main implementation plan that is currently in draft.

e) Urban and Regional Planning.

The report under this section is not clear in that the purpose of establishing the Core technical team was not highlighted. On the other hand, the target for compliance monitoring as well as the areas or regions where the reports had been done are not stated.

Strategy 2: Enhanced Natural Resource Management

a). Nature-based Solutions.

On Nature-based solutions that focused on Degraded Rangeland Rehabilitation, the target to rehabilitate 20,000 hectares of degraded rangelands was reported to have been achieved and exceeded by 37.5 percent as 27,507 hectares of degraded rangelands was rehabilitated. The report does not specify the actual places where this was undertaken. The next reports should be more specific to allow for validation and verification of such activities.

b). Sustainable consumption and production.

Genotypic and phenotypic characterisation of indigenous livestock, regarding the number indigenous livestock species characterized, 1 out of 2 indigenous livestock species were met according to the report. We note that no explanation was provided as to why the second target wasn't met. The Annual report should highlight reasons as to why certain targets were not met for better future interventions.

With the regard to the genetic improvement of indigenous culturable fish species that were to be characterized and improved, the Cluster Advisory Group (CAG) report highlight 1 species of fish was characterized and improved while the Annual Progress report does not have any information on the fish species characterized and improved. There is a disconnect of information with the report and what the Cluster Advisory group reported. There needs to be uniform data for the information in the report to be trusted.

c). Sustainable Land, Forest and Water Management.

Large scale forest restoration of deforested and degraded land (sensitive ecosystems such as water catchments) was targeted to be implemented through the development of the National Forest Landscape Restoration Strategy developed. The targets included the development of the National Action Plan on sustainable management, restoration of 109.6 hectares of degraded land from mining and six (6) percent reduction in loss of biodiversity. The report indicates that this was achieved. We, however, note that the report is not specific as to the areas where for instance the 6% reduction for loss of biodiversity was undertaken.

d). Sustainable land Management.

This was aimed at achieving land degradation neutrality and the report indicates the target of land under sustainable management and specifically 76,003.77ha was achieved against 50,000ha planned. It is worth noting that this target was accomplished mainly due to the TRALAD interventions. The implementation plan target was 10,000 square km in 5 years. The annual progress report, however, does not include other projects being undertaken by the Government in other areas such as Eastern Province.

MISLEADING DATA

- The plan to manage land and bring it under sustainable management was at 2,000 ha according to the implementation plan. This was attributed to the Transforming Landscape for Resilience and Development (TRALAD) project interventions.
- The report shows on page 60 that, 76,003.77 hectares was brought under sustainable management against the planned target of 50,000ha through the TRALAD project.

We therefore express our concern regarding the information provided, as it appears to be misleading. It is important to note that there are other significant projects, such as ZIFIL and SCRICA, as well as initiatives led by non-state actors like COMACO, Bio-carbon Partners and WWF, among others. In a national report, it is essential to reflect the progress made by other actors at the national level, rather than solely focusing on the TRALAD project.

5. GENERAL COMMENTS

Institutional Framework Strengthening.

We note that there is a lack of coordination and structures focusing on climate services at district and provincial level. For instance, the Forestry Department and Meteorological department structures work in silos.

On the Green Finance Policy and Implementation Plan development and Green Finance Tagging and Reporting, these were not done, the report indicates that it was delayed due to internal

procurement controls. We recommend that there is need to review and strengthen internal procurement processes to make them responsive and effective so that planned activities are not unduly delayed.

Climate Change legislation.

We note that the final draft of the National Climate Change Bill was submitted to Ministry of Justice and that the Bill has been undergoing a protracted process of review as it has never been tabled before Parliament. As CSO, we call upon the government to expedite the tabling of the draft climate Change Bill in Parliament in 2023.

National Policy on Climate Change.

The National Policy on Climate Change review process is sluggish due to prolonged processes and there is need to conclude the process of consultations and produce a final policy. Additionally, Communication to stakeholders is necessary.

Green Growth Strategy.

The Zero draft of this strategy has been developed and is presently undergoing an internal review. However, the process is progressing slowly and should be concluded promptly in order to expedite its implementation.

Before we conclude, we are concerned that the report has highlighted the non-availability of data in some areas i.e., on Sustainable Agriculture Promotion; the annual report shows that there were no targets under this program in contradiction to the implementation plan which outlines 2 targets. The information in the report is inadequate and false. There is a need for alignment between the information contained in the report and the implementation plan. This development puts into question the reliability of the data presented.

6. CONCLUSION

During the period under review, the government didn't achieve most of the targets as planned. Overall, the achievement rate is 44%. Notable achievements reported include the following:

- **Strengthen Climate Change Adaptation:** There is notable progress on long term adaptation planning such as the commissioning of studies, prioritization of adaptation options in the nine (09) sectors, capacity building of Provincial and Local Authority Planners in integrating climate change adaptation into plans and budgets, development of a communication strategy, introduction of nature-based solutions, development of the National Action Plan on sustainable management, among others.
- **Strengthen Climate Change Mitigation:** There was high achievement on Sustainable Land Management targets, achievement of EIAs, reduction of deforestation rate, commissioning of three renewable energy projects against a target of two, among others

There is worry regarding failure to meet most of the targets for the period under review and the critical issues are the following;

- **Policy and strategy measures:** Failure to develop the Green Economy and Climate Change sector mainstreaming guidelines in nine (9) sectors and a Green Finance Policy and framework for monitoring, evaluation and reporting.
- **Funding mechanisms:** The report indicated that the main reason for failing to meet the targets was due to limited resources. This is a clear sign of failure to allocate and disburse adequate resources towards environmental sustainability.
- **Coordination mechanisms:** There was no mention of which targets were met as a result of non-state actors such as private and CSOs activities. Nonstate actors are doing tremendous work for environmental sustainability that is contributing to the progressive realization of 8th NDP targets and yet these are not recorded. We therefore call for improved participatory and inclusive monitoring mechanisms so that more data is captured for the next reports. Also, there is limited engagement and coordination activities among various organizations at ward, District and Provincial levels.

Hon. Chairperson and Committee Members, in conclusion we want to thank you for according to us this opportunity to make this submission.