

The Integrated Metropolitan Environmental Policy of the City of Cape Town: An Implementation Evaluation

by

Rinus Werner Burger

*Thesis presented in partial fulfilment of the requirements for the degree Masters in Public and
Development Management in the faculty of Management Science at Stellenbosch University*



Supervisor: Prof C (Christo) de Coning

December 2015

Declaration

By submitting this thesis electronically, I declare that the entirety of the work contained therein is my own, original work, that I am the sole author thereof (safe to the extent explicitly otherwise stated), that reproduction and publication thereof by Stellenbosch University will not infringe any third party rights and that I have not previously in its entirety or in part submitted it for obtaining any qualification.

Date: 05 October 2015

Copyright © 2015 Stellenbosch University

All rights reserved

Abstract

The thesis examines the implementation process of the Integrated Metropolitan Environmental Policy (IMEP) and its Environmental Agenda of the City of Cape Town (COCT), which is coordinated and implemented by the Environmental Resource Management Department (ERMD) within the COCT. A literature review is presented on the discourse of public policy and more specifically policy implementation. The literature review revealed complexities of policy implementation and how certain variables can directly affect the process of implementation. Therefore as a result of this, the different approaches and models of implementation that is discussed in the literature gives rise to a kind of consensus regarding important variables that policy makers and implementers need to consider in order to ensure that successful policy implementation is realised. The literature review indicates that the process of policy formulation and implementation does not operate in isolation and for this reason the thesis also looks at the South African legislative framework that informs and guides environmental policy.

A background on the ERMD is provided, which highlights the departments role and key priorities with regards to environmental management. The research findings on IMEP show that the policy has become outdated due to the fact that it has never been updated since its inception in 2003. Data collected also show that a lack of monitoring and evaluation tools and a weak institutional positioning of the policy has not provided it with the necessary strategic direction and leadership for its implementation. What was also clear was the fact that there was no clear communication strategy or transversal working groups in place to support the implementation of the policy over time.

The thesis finally provides clear recommendations for the ERMD with regards to developing a new environmental policy for the COCT. These recommendations include the following: developing new tools to implement environmental policy principles; aligning environmental policy with national, provincial and city strategic directives for environmental management and objectives; provide closer engagement with partners inside and outside the organisation; developing an appropriate M&E oversight system; developing a communication strategy for the policy; and developing policy at the strategic level. These recommendations will only add value to environmental policy if the variables that affect policy implementation are identified and adhered to in the future.

Opsomming

Die tesis ondersoek die proses vir die implementering van die Geïntegreerde Metropolitaanse Omgewingsbeleid (GMOB) van die Stad Kaapstad en die Omgewingsagenda daarvan, wat deur die Departement vir die Bestuur van Omgewingshulpbronne in die Stad Kaapstad gekoördineer en geïmplementeer word. 'n Literatuuroorsig met betrekking tot die diskoers van openbare beleid, en meer spesifiek die implementering van beleid, word aangebied. Die literatuuroorsig het die kompleksiteit van die implementering van beleid en hoe sekere veranderlikes die proses van implementering regstreeks kan beïnvloed, belig. As gevolg hiervan, gee die verskillende benaderings en modelle van implementering wat in die literatuur bespreek word dus aanleiding tot 'n soort konsensus oor belangrike veranderlikes wat deur beleidmakers en implementeerders oorweeg moet word om te verseker dat suksesvolle beleidsimplementering verwerklik word. Die literatuuroorsig dui daarop dat die proses van formulering en implementering van beleid nie geïsoleerd plaasvind nie; om hierdie rede word in die proefskrif gekyk na die Suid-Afrikaanse wetgewende raamwerk wat omgewingsbeleid inlig en dit begelei.

Die agtergrond van die Departement vir die Bestuur van Omgewingshulpbronne wat verskaf word, beklemtoon die departement se rol en belangrike prioriteite met betrekking tot Omgewingsbestuur. Ten opsigte van GMOB het die navorsing bevind dat die beleid verouderd geraak het omdat dit glad nie sedert sy ontstaan in 2003 opgedateer is nie. Data wat ingesamel is, toon ook dat 'n gebrek aan instrumente vir monitering en evaluering en die swak institusionele posisie van die beleid dit nie van die nodige strategiese rigting en leierskap vir die implementering daarvan voorsien het nie. Wat was ook duidelik was, is dat daar geen duidelike kommunikasiestrategie of transversale werkgroepe ingestel was om die implementering van die beleid met verloop van tyd te ondersteun nie. Laastens bied die tesis duidelike aanbevelings vir die Departement vir die Bestuur van Omgewingshulpbronne met betrekking tot die ontwikkeling van 'n nuwe omgewingsbeleid vir die Stad Kaapstad. Hierdie aanbevelings sluit die volgende in: die ontwikkeling van nuwe instrumente vir die implementering van omgewingsbeleidsbeginsels; aanpassing van omgewingsbeleid by strategiese riglyne vir omgewingsbestuur en doelwitte op nasionale, provinsiale en stadsvlak; voorsiening van nader betrokkenheid by vennote binne en buite die organisasie; ontwikkeling van 'n toepaslike M & E toesigstelsel; ontwikkeling van 'n kommunikasiestrategie vir die beleid; en ontwikkeling van beleid op strategiese vlak. Hierdie aanbevelings sal egter slegs

waarde tot omgewingsbeleid toevoeg as die veranderlikes wat die implementering van beleid bemoontlik in die toekoms geïdentifiseer en toegepas word.

Acknowledgements

Firstly, I would like to thank our heavenly father for his strength and support in allowing me to do accomplish this milestone in my life. Without him this would not have been possible

My parents Lana and Marius for their unwavering support throughout my academic career, you gave me the strength and drive to keep going even when at times it seemed as if there was no end in sight, you never stopped believing. I am honoured and grateful for having such loving parents.

Thank you to my brother Avon and all my friends for your support in this adventurous time.

A big thank you to Prof Christo de Coning, my supervisor, for all your hard work and kind support during this time. A prospective Masters student will do well to have you as their supervisor.

Lastly, I would like to thank the Environmental Resource Management Department (ERMD) of the City of Cape Town, and especially Ms Amy Davison for your willingness to support this study.

Table of Contents

DECLARATION.....	I
ABSTRACT.....	II
OPSOMMING.....	III
ACKNOWLEDGEMENTS	V
LIST OF FIGURES.....	XI
LIST OF TABLES	XII
LIST OF ADDENDUMS.....	XIII
ACRONYMS AND ABBREVIATIONS	XIV
CHAPTER 1: INTRODUCTION TO THE STUDY	1
1.1 INTRODUCTION	1
1.2 ENVIRONMENTAL POLICY CONTEXT OF SOUTH AFRICA	3
1.3 LOCAL GOVERNMENT CONTEXT: ENVIRONMENTAL POLICY	4
1.4 RESEARCH PROBLEM AND OBJECTIVES	5
1.5 RESEARCH DESIGN	6
1.6 METHODOLOGY	6
1.7 CHAPTER OUTLINE	6
1.7.1 CHAPTER ONE: INTRODUCTION	7
1.7.2 CHAPTER TWO: THE NATURE AND PROCESS OF PUBLIC POLICY IMPLEMENTATION	7
1.7.3 CHAPTER THREE: POLICY AND LEGISLATIVE CONSIDERATIONS FOR ENVIRONMENTAL GOVERNANCE	7
1.7.4 CHAPTER FOUR: RESEARCH DESIGN AND METHODOLOGY	7
1.7.5 CHAPTER FIVE: FIELDWORK RESULTS AND RESEARCH FINDINGS	7
1.7.6 CHAPTER SIX: CONCLUSION AND RECOMMENDATIONS	8
CHAPTER 2: THE NATURE AND PROCESS OF PUBLIC POLICY IMPLEMENTATION	9
2.1 INTRODUCTION	9
2.2 WHY IS THERE A NEED FOR SUSTAINABLE DEVELOPMENT?	10
2.3 WHY IS THERE A NEED FOR SUSTAINABLE ENERGY?	11
2.4 THE CONCEPT OF PUBLIC POLICY AND POLICY MAKING	11

2.5	THE DISCOURSE ON PUBLIC POLICY IMPLEMENTATION	14
2.6	POLICY GAPS	16
2.7	DISTINCT APPROACHES TO POLICY IMPLEMENTATION THEORY	16
2.7.1.	THE CLASSICAL ‘TOP-DOWN’ APPROACH TO POLICY IMPLEMENTATION	17
2.7.2.	POLICY IMPLEMENTATION: A COMPLEX POLITICAL AND ADMINISTRATIVE PROCESS	19
2.7.3.	SEARCHING FOR A WELL-DEVELOPED IMPLEMENTATION THEORY	20
2.8	CRITICAL VARIABLES THAT SHAPE THE PROCESS OF POLICY IMPLEMENTATION	222
2.8.1.	THE 6-C PROTOCOL: CRITICAL VARIABLES FOR STUDYING IMPLEMENTATION	244
2.8.1.1.	CONTENT	25
2.8.1.2.	CONTEXT	26
2.8.1.3.	COMMITMENT	27
2.8.1.4.	CAPACITY	28
2.8.1.5.	CLIENTS AND COALITIONS	29
2.8.1.6.	COMMUNICATION	29
2.9	PROGRAMME MANAGEMENT AND PUBLIC POLICY IMPLEMENTATION	30
2.10	CONCLUSION	31
<u>CHAPTER 3: POLICY AND LEGISLATIVE CONSIDERATIONS FOR ENVIRONMENTAL GOVERNANCE... 33</u>		
3.1	INTRODUCTION	33
3.2	THE SOUTH AFRICAN ENVIRONMENTAL POLICY AND LAW CONTEXT	33
3.3	WHITE PAPER ON ENVIRONMENTAL MANAGEMENT POLICY FOR SOUTH AFRICA	34
3.4	THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT NO. 62 OF 2008 (NEMA)	36
3.4.1	ENVIRONMENTAL IMPACT ASSESSMENTS AND NEMA	38
3.5	SECTORAL ENVIRONMENTAL MANAGEMENT ACTS (SEMAs)	39
3.5.1	THE NATIONAL ENVIRONMENT MANAGEMENT: PROTECTED AREAS ACT No. 57 OF 2003 (NEMPAA)	39
3.5.2	THE NATIONAL ENVIRONMENTAL MANAGEMENT BIODIVERSITY ACT No. 10 OF 2004 (NEMBA)	40
3.5.3	THE NATIONAL ENVIRONMENT MANAGEMENT: AIR QUALITY ACT No. 39 OF 2004 (NEMAQA)	41
3.5.4	THE NATIONAL ENVIRONMENT MANAGEMENT: INTEGRATED COASTAL MANAGEMENT ACT, 2008 (NEMICMA)	42
3.5.5	THE NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 2008 (NEMWA)	45
3.5.6	THE NATIONAL HERITAGE RESOURCES ACT No. 25 OF 1999 (NHRA)	46
3.6	CONCLUSION	47
<u>CHAPTER 4: RESEARCH DESIGN AND METHODOLOGY 48</u>		
4.1	INTRODUCTION	48

4.2	CHOOSING THE CORRECT RESEARCH DESIGN	48
4.3	METHODOLOGY	49
4.3.1	RESEARCH METHODOLOGY	50
4.3.2	DATA YIELDED	51
4.3.3	INTERPRETING THE DATA COLLECTED	51
4.3.4	DATA INTERPRETATION INSTRUMENT	51
4.3.5	THE REASONING BEHIND CHOOSING THE 6-C PROTOCOL AS AN INSTRUMENT OF ASSESSMENT	53
4.4	THE ETHICAL THOUGHT PROCESS BEHIND THE STUDY	53
4.5	CONCLUSION	53
CHAPTER 5: FIELDWORK RESULTS AND RESEARCH FINDINGS.....		55
5.1	INTRODUCTION	55
5.2	THE ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT (ERMD) OF THE CITY OF CAPE TOWN: IMPLEMENTING AGENCY	55
5.2.1	CHALLENGES	56
5.3	THE INTEGRATED METROPOLITAN ENVIRONMENT POLICY	57
5.4	FIVE-YEAR REVIEW OF THE IMEP FROM 2003 TO 2008	63
5.4.1.	SUMMARY OF THE REVIEW FINDINGS OF THE IMEP	64
5.4.2.	ANALYSIS AGAINST THE 6-C PROTOCOL	64
5.5	CITY OF CAPE TOWN ENVIRONMENTAL AGENDA	65
5.5.1.	BIODIVERSITY	65
5.5.2.	CARBON FOOTPRINT	66
5.5.3.	ENERGY EFFICIENCY	66
5.5.4.	CLIMATE CHANGE ADAPTION PLAN	66
5.5.5.	ENVIRONMENTAL COMPLIANCE	66
5.5.6.	ENVIRONMENTAL EDUCATION AND COMMUNICATION	67
5.5.7.	CULTURAL HERITAGE	67
5.5.8.	ANALYSIS AGAINST THE 6-C PROTOCOL	68
5.6	STATE OF THE ENVIRONMENT REPORT	68
5.6.1	ANALYSIS AGAINST THE 6-C PROTOCOL	69
5.7	2013 IMEP REVIEW: PHASE ONE SCOPING REPORT	69
5.7.1	ANALYSIS AGAINST THE 6-C PROTOCOL	70
5.8	STRATEGIC CITY LEVEL DOCUMENTS PROVIDING DIRECTIVES FOR ENVIRONMENTAL MANAGEMENT	70
5.8.1.	ONECAPE 2040	70

5.8.1.1 Analysis against the 6-C Protocol.....	72
5.8.2. THE CITY DEVELOPMENT STRATEGY (CDS)	72
5.8.2.1 Analysis against the 6-C Protocol.....	73
5.8.3. THE INTEGRATED DEVELOPMENT PLAN (2012-2017)	73
5.8.3.1 Analysis against the 6-C Protocol.....	74
5.8.4. CAPE TOWN SPATIAL DEVELOPMENT FRAMEWORK (CTSDF)	74
5.8.4.1 Analysis against the 6-C Protocol.....	74
5.9 FIELDWORK RESULTS ON THE 6-C PROTOCOL	75
5.9.1. METHODOLOGICAL NOTES	75
5.9.2. THE “CONTENT OF POLICY” AND THE EXTENT OF ITS IMPLEMENTATION	75
5.9.3. INSTITUTIONAL CONTEXT IN THE IMPLEMENTATION PROCESS	77
5.9.4. COMMITMENT TO IMPLEMENTING POLICY	79
5.9.5. CAPACITY TO IMPLEMENT POLICY	80
5.9.6. THE ROLE OF CLIENTS AND COALITIONS	82
5.9.7. COMMUNICATION AROUND THE IMPLEMENTATION OF POLICY	83
5.10 RESEARCH FINDINGS	84
5.10.1. CONTENT OF POLICY	84
5.10.2. CONTEXT OF POLICY	85
5.10.3. COMMITMENT OF POLICY	86
5.10.4. CAPACITY OF POLICY	86
5.10.5. CLIENTS AND COALITIONS OF POLICY	87
5.10.6. COMMUNICATION OF POLICY	87
5.11 CONCLUSION	88
<u>CHAPTER 6: CONCLUSION AND RECOMMENDATIONS</u>	<u>89</u>
6.1 INTRODUCTION	89
6.2 RECOMMENDATIONS	90
6.2.1. RECOMMENDATION 1: THE DEVELOPMENT OF NEW TOOLS TO IMPLEMENT POLICY PRINCIPLES AND OBJECTIVES	90
6.2.2. RECOMMENDATION 2: ALIGNING ENVIRONMENTAL POLICY WITH NATIONAL, PROVINCIAL AND CITY STRATEGIC DIRECTIVES FOR ENVIRONMENTAL MANAGEMENT	90
6.2.3. RECOMMENDATION 3: CLOSER ENGAGEMENT WITH PARTNERS INSIDE AND OUTSIDE THE ORGANISATION	91
6.2.4. RECOMMENDATION 4: DEVELOPING AN APPROPRIATE M&E OVERSIGHT SYSTEM	92
6.2.5. RECOMMENDATION 5: DEVELOPING A COMMUNICATION STRATEGY FOR THE POLICY	92
6.2.6. RECOMMENDATION 6: DEVELOP POLICY AT THE STRATEGIC LEVEL	93

6.3 POTENTIAL THEMES FOR FUTURE RESEARCH	93
6.4 CONCLUSION	94
<u>REFERENCES</u>	<u>95</u>
<u>ANNEXURE A: IMEP SECTORAL APPROACHES.....</u>	<u>106</u>
<u>ANNEXURE B: IMEP LEADERSHIP PLEDGE.....</u>	<u>110</u>
<u>ANNEXURE C: CITY OF CAPE TOWN ENVIRONMENTAL AGENDA TARGETS 2009-2014.</u>	<u>111</u>
<u>ANNEXURE D: RESEARCH SCHEDULE.....</u>	<u>117</u>

List of Figures

Figure 2.1: The Australian Policy Life Cycle.....	14
Figure 2.2: Linear Model of Implementation.....	18
Figure 2.3: Interactive Model of Implementation.....	21
Figure 5.1: How do you rate the “Context” of the Policy?.....	78
Figure 5.2: How do you rate the “Commitment” of the Policy?.....	80
Figure 5.3: How do you rate the “Communication” of the Policy?.....	84

List of Tables

Table 2.1: Howlett and Ramesh’s Five Stage Policy Cycle.....	13
Table 2.2: Policy Implementation Variables.....	24
Table 5.1: 6-C Variable Analysis of IMEP.....	59
Table 5.2: OneCape 2040 Transitions and Goals.....	71
Table 5.3: CDS Goals and their Alignment to IDP (2012-2017) and OneCape 2040.....	72

List of Addendums

1. Annexure A: IMEP Sectoral Approaches.....	106
2. Annexure B: IMEP Leadership Pledge.....	110
3. Annexure C: City of Cape Town Environmental Agenda Targets 2009-2014.....	111
4. Annexure D: Research Schedule.....	117

Acronyms and Abbreviations

IMEP -	Integrated Metropolitan Environmental Policy
COCT-	City of Cape Town
ANC-	African National Congress
NEMA-	National Environmental Management Act
CONEPP-	Consultative National Environmental Policy Process
NGO's -	Non-Governmental Organisations
SEMA's-	Sectorial Environmental Management Acts
NEMPAA-	National Environment Management Protected Area's Act
NEMBA-	National Environmental Management Biodiversity Act
NEMAQA-	National Environment Management Air Quality Act
NEMICMA-	National Environment Management Integrated Coastal Management Act
CPZ-	Coastal Protection Zone
NEMWA-	National Environmental Management Waste Act
NHRA-	National Heritage Resources Act
LBSAP-	Local Biodiversity Strategy and Action Plan
SoE-	State of the Environment Report
EDP-	Economic Development Partnership
CDS-	City Development Strategy
CTSDF-	Cape Town Spatial Development Framework
EIA's-	Environmental Impact Assessments
SPU-	Strategic Policy Unit
ICT-	Information Communication Technology
GIS-	Geographical Information Systems
WCG-	Western Cape Government
PPP-	Public Private Partnership
M&E-	Monitoring and Evaluation

Chapter 1: Introduction to the Study

1.1 Introduction

The City of Cape Town (hereafter referred to as COCT) has made a strong commitment to more sustainable development practices through several policy documents that have been developed since 1994 (City of Cape Town, 2001, 2003, 2007, 2011). The most noteworthy of these is the overarching Integrated Metropolitan Environmental Policy (hereafter referred to as IMEP). The central informant to the development of the IMEP was the city's first State of the Environment Report (hereafter referred to as SoE), which was published in 1998. The SoE offers a snapshot of the state of the environment, while at the same time clarifying environmental trends. The IMEP was formally adopted by the City of Cape Town in 2001. The policy is environmentally focused and places sustainable development, the wellbeing of people, and the resources on which they depend, at the top of its agenda. The IMEP provides a vision of environmental targets to be met by 2020, with the reduction of carbon emissions and energy efficiency central to its sustainable energy target. The Environmental Resource Management Department (hereafter referred to as the ERMD) of the COCT is responsible for leading both the implementation of the IMEP and its Environmental Agenda, thereby making sure that the city's environment is protected and sustainably utilised for its communities. The key role of the ERMD is to ensure the strategic integration of environmental issues across city service delivery.

The city council's five-year review of the first IMEP identified the need for the city and all its stakeholders to actively shift from a business-as-usual to a driven and targeted sustainability agenda if it is to actively mitigate and reverse environmental degradation (City of Cape Town, 2009). This led to the formulation of the IMEP Environmental Agenda in 2009. The Environmental Agenda would operationalise environmental management and responsibility across all city line functions. The IMEP forms an implementation framework for a series of strategic environmental programmes, while the Environmental Agenda sets out clearly defined measurable and accountable environmental targets across city service delivery based on four central principles, which include:

- A commitment by the city to focus on sustainable implementation and to move away from a business-as-usual approach.
- The adoption of 17 specified targets for building a more sustainable city.

- Placing emphasis on the financial viability of ensuring environmental protection and management.
- A commitment by city line functions to environmental accountability, as reflected in the specific environmental targets and goals.

(ERMD Departmental Business Plan, 2010:3)

On the other hand, the 2013 review of the IMEP, in summary, called for the development of a completely new policy and strategy to be developed in the form of an Environmental Sustainability Governance Policy together with an Environmental Sustainability Governance Strategy, which operationalise the policy through the creation of specific measurable targets.

Cape Town faces a number of challenges regarding its environment. Cape Town has a high carbon footprint when compared to other similar-sized cities (7.8 tonnes per person), rapid urbanisation is taking place, it has poor energy security and associated energy poverty, and the city is vulnerable to the impacts of climate change (City of Cape Town, 2011:3; City of Cape Town, 2012:25).

Cape Town is known around the world as an international global biodiversity hotspot. The city is located in a mountainous area, with several river systems, and connects both the Indian and Atlantic Ocean. The mountain and beaches play an integral role in attracting tourists to the area, which adds significant economic value to the region. It is therefore important to maintain this ecological integrity of the environment.

The reason why the COCT has been chosen as a study area is underpinned by the city's significant commitment to achieving future sustainable development, the city's significance as a tourist destination, the diversity of its inhabitants, and its geographical location within the proximity of a highly sensitive environmental system. The COCT has made strong commitments to sustainable development practices in its policies and strategies, but it is important to note that the mere existence of good policies, strategies and programmes does not automatically result in successful implementation. South Africa as a developmental state has largely shifted the focus on policy from policy formulation to implementation. Brynard (2007a:363) states that, with the dawning of the implementation phase of policy, more policy gaps have manifested themselves. Evaluating the implementation process is crucial for understanding the challenges of implementation in order to successfully deliver on the

sustainable environmental targets and goals set out in the IMEP Environmental Agenda of the City Cape Town (2009).

1.2 Environmental Policy Context of South Africa

During the oppression era of Apartheid, a small minority of technocrats drove the process of environmental policy making, while the broader civil society was excluded from policy debate. Peart and Wilson (1998) note that stakeholder engagement was at that time limited to only a small group of technical experts on the subject. Furthermore, public participation, if it transpired at all, was restricted to activities such as information distribution and rare consultation sessions with select interest groups. As the process of democratisation began between the period of 1990 and 1994, environmental policy dialogue also started to change. Debates around environmental policy were broadened to include the objectives that democracy held, as well as the social and economic issues surrounding the environment. Macdonald (2002b) notes that central to this change in discourse is the idea of ‘environmental justice’. Subsequently, environmental policy just before and after the democratic elections in 1994 saw for the first time the inclusion of civil society rights, socio-economic issues and quality of life into the environmental policy agenda.

Rossouw and Wiseman (2004:133) note that, since the transition era, the agenda of environmental policy making has been mostly determined by the following key factors:

- The leading political party, the African National Congress (ANC), made a commitment to establish an effective system of environmental management.
- The inclusion of strong environmental rights into the Constitution of the Republic of South Africa (Republic of South Africa, 1996:11).
- A vacuum in policy and law for environmental justice, health and management issues.

As a result, these key factors created a platform for the decree of the country’s first democratic national environmental policy process, which came to be known as the Consultative National Environmental Policy Process (hereafter referred to as CONEPP). CONEPP was crucial in the promulgation of the National Environmental Management Act (No. 107 of 1998) (hereafter referred to as NEMA), which gave a legal framework for

environmental management in South Africa and subsequent environmental policies, which will be referred to in Chapter Three of this dissertation.

1.3 Local Government Context: Environmental Policy

Municipal areas in South Africa vary from areas of extreme inequality associated with many third world countries, with townships experiencing poor service delivery, to areas of prosperity, comparable with municipal areas in affluent first world countries. For example, in Cape Town one can find suburban areas such as Clifton, Platteklouf and Durbanville, which receive world-class service delivery, only to find townships such as Mitchells Plain a few kilometres away, where residents often receive poor services and as a result social unrest and service delivery strikes often occur.

Since the democratic elections in 1994, transformations in policy and legislation have placed greater responsibility on local government to expand its role from a service delivery provider to that of a developmental agent. The Municipal Systems Act (No. 32 of 2000) clearly lays out the new objectives of local government to include:

- Providing a democratic and accountable local government for local communities;
- Ensuring the provision of services to communities in a sustainable manner;
- Promoting social and economic development;
- Promoting a safe and healthy environment; and
- Encouraging the involvement of communities in the matters of local government.

The Act defines a number of obligations for environmental management by municipalities, which must be accommodated and reflected in their policies and institutional framework of the authority.

The need for local government environmental policy is based on the principle of “think global, act local”. National policies are often too general and don’t speak to specific local issues. As a result, a key aspect of local government environmental policies should be to focus on local issues, as well as those on a national level, thus ensuring that all environments are taken into account. Furthermore, local government is an enforcing agent of national

policy, which means that the development of more detailed and local appropriate environmental policies is a key aspect of enforcing environmental performance.

1.4 Research Problem and Objectives

Cape Town faces a number of challenges regarding its environment. Cape Town has a high carbon footprint compared to other similar sized cities (7.8 tons per person), rapid urbanisation is taking place, it has poor energy security and associated energy poverty and the city is vulnerable to the impacts of climate change (City of Cape Town, 2011:3; City of Cape Town, 2012:25). The implementation of the city's Integrated Metropolitan Environmental Policy is crucial in overcoming these challenges through the reaching of its targets of reducing carbon emission, improving energy efficiency, and adopting a climate change adaptation plan and an urban edge plan that limits urban sprawl (City of Cape Town, 2009:4-5). Unless the city's environmental sustainability model is reformed, the city will remain on a weak sustainability path attempting to manage and mitigate, instead of addressing the underlying causes of environmental degradation.

The aim of this research study is to evaluate the implementation process of the IMEP of the City of Cape Town.

Study Objectives

- To understand and describe the literature-based approaches to policy implementation.
- To contextualise, describe and explain the Integrated Metropolitan Environmental Policy of the City of Cape Town.
- To use policy implementation approaches to analyse the current state of the Integrated Environmental Metropolitan Policy implementation process in the City of Cape Town.
- To provide, on the basis of Brynard's 6-C Protocol, some recommendations for improved environmental policy implementation.

1.5 Research Design

The research study will be constructed as a non-empirical and qualitative empirical study. Additionally, the researcher has decided to conduct an implementation process evaluation study. Non-empirical research is grounded on secondary research and will comprise of a literature review in order to familiarise the researcher with the unit of analysis. This will allow for an inclusive and well-integrated study of the literature. In order to provide the necessary answers to the research problem, a qualitative empirical study will be conducted. Primary and existing data of a textual nature will be used and analysed within this study. There are certain challenges that the researcher needs to take into account when adopting a research design of this nature – these include the possibility of the researcher being biased or the unwieldy nature of the process of data collection and the analyses thereof.

Therefore, the empirical study will entail analysing policy documents, reports and legislation regarded as the conduits of implementation of the policy, while at the same time analysing data generated by the structured interviews conducted with individuals within the Environmental Resource Management Department (ERMD) of the City of Cape Town.

1.6 Methodology

The researcher will make use of Brynard's (2005) 6-C Protocol model of implementation as a critical tool for analysing the data collected through field interviews, and a textual analysis of policy documents and other relevant implementation documents concerned with the implementation of the IMEP and its Environmental Agenda. This will provide the researcher with critical aspects of the policy that are important for the implementation process. Structured interviews were conducted with specifically identified individuals within the ERMD of the City of Cape Town.

1.7 Chapter Outline

The framework of the study, outlined in terms of the specific chapters, is set out below.

1.7.1 Chapter One: Introduction

Chapter one introduces the thesis and provides the rationale for the study. The chapter presents the research aims and objectives of the study.

1.7.2 Chapter Two: The Nature and Process of Public Policy Implementation

Chapter two is dedicated to a comprehensive literature review in respect of the study to be conducted. It entails an examination of the discourse of public policy implementation as provided by the literature on the subject. The literature review seeks to provide a platform for understanding public policy theory and more specifically policy implementation theory to further the social objectives of protecting the environment and the more profound and complex goal of sustainability.

1.7.3 Chapter Three: Policy and Legislative Considerations for Environmental Governance

Chapter Three's main aim is to provide the legislative and contextual background of environmental management within South Africa, which will provide the researcher with information on how South Africa's legal mandate protects the natural environment for the needs of current and future generations.

1.7.4 Chapter Four: Research Design and Methodology

Chapter four provides the parameters for the research design and methodology of the study, which will look at what the researcher will do and how.

1.7.5 Chapter Five: Fieldwork Results and Research Findings

Chapter five will seek to evaluate the implementation process of the IMEP and its Environmental Agenda through, firstly, engaging the Environmental Resource Management Department (ERMD) of the city of Cape Town. Secondly, the chapter will present the results

of the textual analysis of the IMEP and the IMEP Environmental Agenda Operational Plan for which implementation is being assessed. Thirdly, the chapter will focus on the application of the 6-C Protocol to the data collected in order to inform the conclusions about the status of the policies' implementation. Fourthly, the chapter will present the results of fieldwork interviews and other relevant documentation that relate to the implementation of the policy by the department of ERMD. Lastly, informed decisions will be made regarding the points mentioned above.

1.7.6 Chapter Six: Conclusion and Recommendations

Chapter six provides a summary of the main findings from the previous chapters. The chapter will also make recommendations in relation to the research findings and provide a conclusion to the study.

Chapter 2: The Nature and Process of Public Policy Implementation

2.1 Introduction

This chapter offers an examination of the discourse of public policy implementation as provided by the literature on the subject. The literature on public policy and more specifically policy implementation is plentiful, and implementation scholars (Brynard, 2005; Brynard & de Coning, 2006; Dye, 1995; O'Toole, 2000; Schofield & Sausman, 2004) have provided ground-breaking work on the complexities of policy implementation. Yet there is still a gap between policy formulation and policy implementation, policy making and service delivery. This is especially true when you look at a country such as South Africa, where service delivery protests are a clear indication of a lack of policy implementation. According to Brynard (2007:263), South Africa has shifted from policy formulation towards an era of policy implementation but, with the dawning of the implementation phase of policy, more policy gaps have manifested themselves.

The literature review seeks to provide a platform for understanding public policy theory and, more specifically, policy implementation theory to further the social objectives of protecting the environment and the more profound and complex goal of sustainability. The exploration will be preceded by an abridged clarification of sustainable development and the importance of this being correctly understood and implemented in the policy making and service delivery environment. Sustainability is the axis around which global environmental policy making is supposed to revolve. However, the concept itself is often poorly understood and its translation into policy and firm action tends to suffer from confusion about whether sustainability is simply an aspirational window dressing or a serious objective of public administration.

Following this, an analysis of implementation and its various theories and approaches used by various scholars since the 1970s will ensue. The researcher will attempt to consider and summarise specific contributions made by a select number of scholars in the field of policy implementation. It is also in this context that the contributions of South African scholars in the field of policy implementation and, more specifically, the contributions of Brynard will receive some thought. This path of examination will lead the researcher in considering the most important variables for policy implementation with regards to the policy in question.

2.2 Why is there a Need for Sustainable Development?

During the 1970s the developed world realised that it was depleting resources at such a fast pace that if excess consumption of natural resources continued, there would be dire consequences for future generations in meeting their own needs. For the first time there was consensus that there are limits to growth. The ideas behind the concept of limited growth gained recognition in 1972 in the report “The Limits to Growth”, which was published by a group of scientists known as the Club of Rome (Meadows, Meadows, Randers & Behrens, 1972). The report analysed the relationship between population and the capacity of the earth’s resources in satisfying the population’s consumption needs and concluded that there are limits on resource use and, if actions weren’t taken, certain resources would become depleted and eventually lost to the world. This saw the publication of “Our Common Future” (also known as the Brundtland Report) in 1987 in which sustainable development was termed as:

“Development that meets the needs of the present generation while ensuring that future generations have the ability to meet their needs as well”.

The definition of sustainable development mentioned above concerns the use of resources on a more responsible and equitable platform. There are two different discourses on resource usage within the sustainable development framework of knowledge. The first is an ecocentric or nature-centred approach to sustainability. It supports a strong, deep and narrow view of sustainability, which advocates environmental concern as its main focus for the intrinsic value associated with looking after the planet (Gallopín, 2003:20). It is concerned with the finiteness of the planet’s natural resources. The second approach is known as the anthropocentric or a human-centred approach. This anthropocentric approach views nature as having value only to the point that it can be used as a resource for humans (Hattingh, 2001:5). What this approach then does is questions the consequences of protecting natural resources, due to the fact that developing countries depend on such natural resources in order to develop their socio-economic environment. The Brundtland definition of sustainable development holds an anthropocentric approach to sustainability, and asks how much of the environment do we preserve, while at the same time achieving a better quality of life for all people.

The limits to growth or the finiteness of the earth’s resources can be viewed in the light of the peak oil debate, which has been ringing in the halls of political and economic debates around the world. There is a general agreement that oil has reached its peak production and that the days of cheap oil are behind us. That the era of post-oil is upon us has even been stated by

some of the biggest oil companies (Swilling & Annecke, 2012:35). The significance of this research is not based on whether oil has reached its peak or not, but rather that the debate around peak oil has placed critical thought on humanity's dependence on natural resources and how the finiteness of non-renewable resources threatens the future of human development.

2.3 Why is there a Need for Sustainable Energy?

Energy plays an important role in our social and economic development plans, but the way in which it is produced, transported and used can contribute to local, environmental and social degradation (Spalding-Fecher, Winkler & Mwakasonda, 2005:99).

There are three fundamentally important reasons for why sustainable energy use is necessary for sustainability practices. The first relates to the long-term benefits that it would have on energy security. Secondly, sustainable energy usage will have a positive effect on our current environmental sustainability. The third reason why sustainable energy use is important is because it has the potential to reduce poverty by means of allowing more equitable access to energy sources, which can then be used to perform services that aid sanitation, entrepreneurship, education and improved quality of life (Smit, 2009:32).

Ndeke (2011:2) notes through her research that, "although sustainable development is addressed in the policy documents of all three spheres of government in South Africa, the implementation has not yet been effective".

2.4 The Concept of Public Policy and Policy Making

Hanekom (as quoted in Turton, Ashton & Cloete, 2003:314) defines policy making as an "activity preceding the publication of a goal, while a policy statement is making known, the formal articulation, the declaration of intent or the publication of the goal to be pursued". Policy itself is thus indicative of a goal or a program of action that has been decided upon by those that have the authority to do so. On this basis we can define public policy as a formally pronounced goal that the legislator intends to pursue with society or with a societal group. Dye (as quoted in Stone, 2008:24) defines policy as whatever governments choose to do or

not to do. Although his definition seems simplistic, it capitulates the true essence of policy making, in which even the absence of policy is itself a policy decision. This research paper will use the definition of public policy termed by de Coning and Wissink (2011:7) in which they define public policy as “a public sector statement of intent, including sometimes a more detailed program of action, to give effect to selected normative and empirical goals in order to improve or resolve perceived problems and needs in society in a specific way, thereby achieving desired changes in that society”. These definitions reflect the complex and multifaceted phenomenon of public policy and show that, as a result of this, scholars lack a consensus definition of public policy.

Birkland (2001:18) notes that although consensus on the precise definition of public policy has not yet been reached; all the variations of the definition suggest that public policy making is public. It affects a larger variety of people and interest than policy decisions, which are made in the private sector. This is why government and the policies made by government are every so often controversial and frustrating, but at the same time crucial in improving our socio-economic and environmental realities. Kraft and Furlong (2014:8) note that public policy is not made in a vacuum. It is affected by economic and social circumstances, prevalent political values and the public mood at any given time, the structure of government, and local and national cultural norms, amongst other variables. From these definitions of policy and policy making it is easy to view policy making as being only a function of government and the judiciary, but policies are not just contained in laws and regulation. Once a rule of law is made, policies continue to be made as the people who implement them – that put policies into effect – make decisions about who will benefit from policy and who will shoulder the burdens as a result.

Policy scholars such as Laswell (1951), Howlett and Ramesh (2003), Bridgman and Davis (2003) Kraft and Furlong (2007), and De Leon and Weible (2010) describe policy as a process consisting of various activities that focus on the making of policy. Laswell (1951) sees policy making as part of a sequence that consists of seven fundamental stages (intelligence, recommendation, prescription, innovation, invocation, application, appraisal, and termination) which he refers to as the life cycle of policy. De Leon and Weible (2010:23) emphasise that policy-making research is often depicted in the content of policy cycles. A policy cycle refers to a recurrent pattern shown by procedures that eventually lead to the creation of a public policy (Savard, 2012:1). The cycle supports public servants to develop policy and guide it through the institutions of government. Referring back to the Lasswell

cycle (1951), three of the sequences identified by Laswell with respect to policy analysis have endured the test of time, but his cyclical model is now generally criticised for its fragmented approach to explanatory factors (Savard, 2012:1). Figure 2.1 shows a more detailed model than that of Harold Lasswell, or by Bridgman and Davis (2001), which they termed the “Australian Policy Life Cycle”.

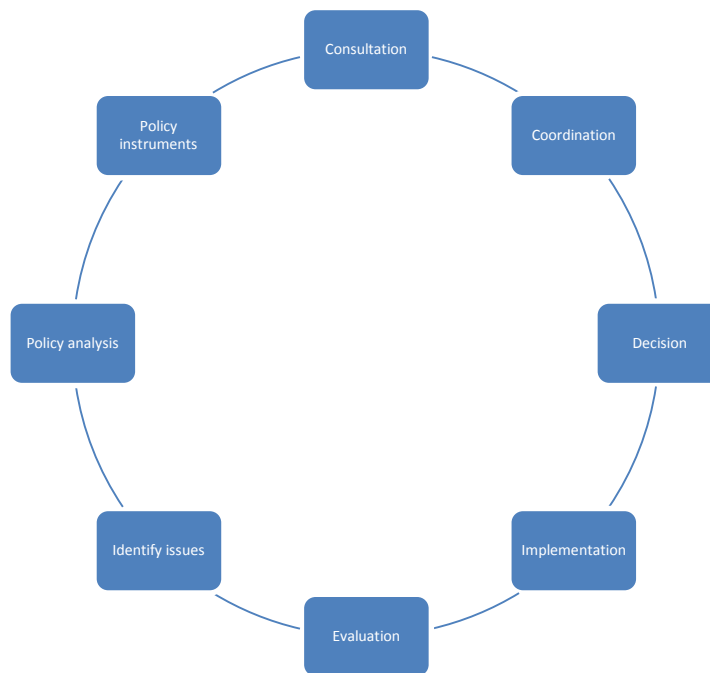
Savard (2012:2) notes in the Encyclopaedic Dictionary of Public Administration that, at present, there is consensus in the field of policy studies that the policy life cycle model should be divided into five major stages, namely agenda setting, policy formulation, public policy decision making, policy implementation, and policy evaluation. Table 2.1 shows Howlett and Ramesh’s (2003:56) five basic stages of a policy life cycle. The table shows the complex nature of policy making through initiation to implementation, and finally the analysis of the outputs and outcomes against the initial policy goals and objectives to determine its success or failure. It is important to note that policy is rarely as neat as it is depicted in these models and/or figures, but it is often beneficial for analytical purposes to break policy making into components in order to better understand how policies are made. The idea here is not to have an in-depth look at policy making models, but to rather illustrate the importance of different ideas and constructions of the policy process to better understand the importance of sustainable policy and policy making in this research paper.

Table 2.1: Howlett and Ramesh’s Five Stage Policy Cycle

STAGES IN THE POLICY LIFE CYCLE
1. Agenda setting: Where problems come to the attention of governments.
2. Policy formulation: Where policy options are developed within government.
3. Policy decision making: Where governments adopt a particular course of action.
4. Policy implementation: Where governments put policies into effect.
5. Policy evaluation: Where results are monitored, and problems and solutions reconsidered.

Source: Howlett & Ramesh (2003:56)

Figure 2.1: The Australian Policy Life Cycle



Source: Bridgman & Davis (2000:27)

2.5 The Discourse on Public Policy Implementation

Scholarly discourse on the process of policy implementation has seen tremendous growth since the 1970s, starting with Jeffrey Pressman and Aaron Wildovsky's pioneering work on policy implementation in 1973. Pressman and Wildovsky determined in their work, published in 1973, that policy implementation was a topic much discussed at the time, but that was paradoxically not comprehensively studied. Shapiro (1978:29) notes that in Pressman and Wildovsky's assessment of relevant writings on policy implementation, the two scholars concluded that, out of the literature they analysed, only Martha Derthick's *New Towns in Town*, gave an in-depth analysis of the implementation process at the time.

Judith N. Shapiro, in her doctoral thesis published in 1978, was critical of the findings made by Pressman and Wildovsky. According to Shapiro (as quoted in Mnculwane, 2008:17), the literature survey that the two scholars conducted was based on finding words such as 'implementation' or any other reasonable synonyms including 'administration', 'application' or 'execution' in the titles searched. The criteria was perhaps too capricious, since a number

of policy studies deal with the difficulties of implementation without specifically referring to the word ‘implementation’ or any of synonyms in their titles. Shapiro is not the only scholar that has been critical of the controversial claim that implementation studies essentially emerged with the publication of such work as that by Pressman and Wildovsky. Hill and Huppe (2002:18-19) argue that implementation has always been a central theme in policy studies. They emphasise the remarks made by Shapiro that the rarely used word of ‘implementation’ in policy studies contributes to the findings reached by Pressman and Wildovsky in 1973. Nevertheless, there is still an argument that can be made in favour of Pressman and Wildovsky, to the extent that contemporary discussion on implementation at the time was failing to yield a well-developed theory of policy implementation and thus their observation can still be considered reasonable and legitimate.

The evolution of policy implementation over the years has still not yielded a comprehensive theory of implementation with an inherent ability to command consensus from a wider front. It is therefore crucial that the concept of implementation be defined to grasp the idea of what it should and/or should not be in order to understand distinct approaches to how policy implementation is studied with reference to this research.

Earlier in the chapter we defined the term public policy and identified implementation as one of the stages in a policy cycle. The researcher will now define the term implementation in its natural state and then define it as a process in the realm of public policy making. According to the Oxford Dictionary (2010), the word ‘implementation’ refers to the act of implementing, or putting into effect. Henry (2001:295) defines implementation as the execution and delivery of policies by organisations or arrangements amongst institutions. Mazmanian and Sabatier (1983:20) define implementation in the realm of public policy making as follows:

“Implementation is the carrying out of a basic policy decision, usually incorporated in a statute, but which can also take the form of important executive orders or court decisions. Ideally that decision identifies the problems and stipulates the objectives to be pursued and in a variety of ways, structures the implementation process. The process normally runs through a number of stages beginning with the passage from the original statute, followed by policy outputs (decisions) of the implementing agencies, the compliance of target groups with those decisions, the actual impact of agency decisions and finally important revisions in the basic structures.”

From a South African perspective, Brynard and de Coning (2006:180) postulate that public policy implementation should be viewed as a multifaceted concept, which is attempted at various levels of government and pursued in conjunction with civil society, private sector and non-governmental organisations (NGOs). These definitions of policy implementation assist an understanding of the complex nature of translating policy into practise and, more importantly, evaluating the implementation path that reinforces the foundation of the origins of policy implementation. The following section will specifically deal with the gap between public policy and practise (implementation).

2.6 Policy Gaps

De Coning and Wissink (2011) write that the differences between policy and practise is a persistent topic in policy discourse, especially in those countries where implementation enjoys considerable attention in the literature. Madue (2008:200) notes that in South Africa policy gaps highlight the challenges faced by government in linking intention with outcome, and rhetoric with practise. A policy gap can be defined as that which transpires in an implementation process between policy expectations and perceived results (Brynard, Cloete & de Coning, 2011:137). Khosa (2003:49) notes in a programme called “closing the gap between policy and implementation in South Africa” that the discrepancies between public policy and implementation are mainly caused by unrealistic policies and a lack of managerial skills. Furthermore, she found an absence of people-driven processes and a lack of coordination within virtually all government sectors, which has significantly hampered policy implementation, adversely affecting service delivery. The following section will look at several generations of scholarly thinking on implementation that will provide some assumptions on the problem of implementation.

2.7 Distinct Approaches to Policy Implementation Theory

The development of policy analysis has over time produced various approaches to the study of policy implementation. Yet there is still no coherent and definite understanding of the phenomenon of implementation. Brynard (2005:651) attempts to examine the evolution of implementation theory by tracking it through three distinctive generations of study on the

topic. The first generation, also known as the ‘classical generation’, considers implementation as something that happens automatically once a policy is adopted. The second generation challenges the basic assumption of the ‘classical generation’ and sets out to demonstrate that implementation is a political process no less complex than that of policy formulation. Finally, rather than focusing on implementation failure, the third generation focuses entirely on how implementation works as a process. The following sections (section 2.7.1 to 2.7.3) will critically analyse some of the significant approaches to implementation theory.

2.7.1. The classical ‘top-down’ approach to policy implementation

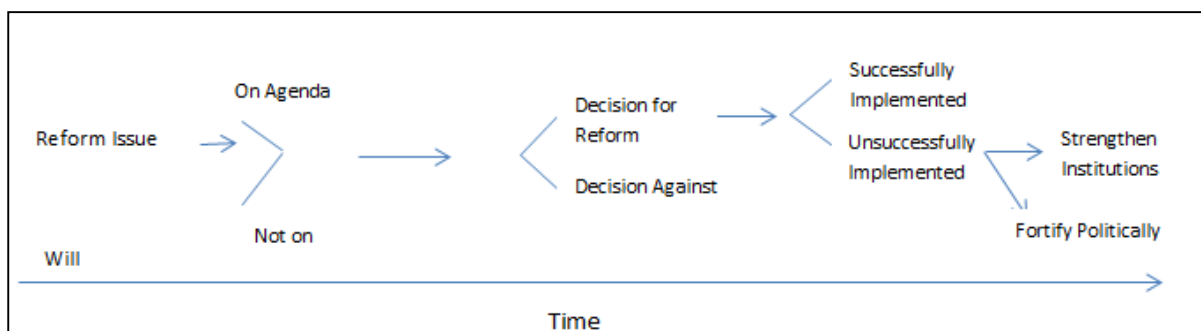
Hjern and Hull (1982) trace the history of the classical view of administration and implementation to the early constitutionalist theorists. Quoting David Hume, they put forward that his, and his successors’, political methodology could be labelled the single authority on top-down approach to policy implementation:

“So great is the force of laws and the particular forms of government and so little dependence have they on the humours and tempers of men, that consequences almost as general and certain may sometimes be deduced from them as any which the mathematical sciences afford us.” (Hjern & Hull, 1982:107).

The first generation of scholars on the subject focused on how a single decision from the top was carried out either at a single location or at numerous sites (Goggin, Lester & O’Toole, 1990:13). This early generation views administration as a rational machine-like system, where policy decisions are made at the top and filter through the organisation down to the bottom where they are implemented by committed and competent agencies/agents without any question of the process or the goals to be achieved. This approach assumes that policies contain clearly defined goals and objectives against which performance can be measured. It also assumes that there is an implementation chain that starts at the top and ends at the bottom, and those who design the policy have a good understanding of the capacity and commitment of the implementers. The approach tends to lend itself to an elitist orientation, which has had seminal influence from Max Weber’s model of bureaucracy. The latter regarded bureaucracy as being a rational, decisively ordered and authoritative system, which informed the understanding of the public service as a system “where a small group of decision makers at the top create policy and subordinates at the bottom dutifully carry it out”

(Brynard, 2000:167). Grindle and Thomas (1991:123) view the first generation's approach as linear model of implementation, see Figure 2.2.

Figure 2.2: Linear Model of Implementation



Source: Grindle & Thomas (1991:123)

Figure 2.2 illustrates the notion that most decision makers and policy analysts in the past created the impression that a proposed policy reform gets on the government agenda for action. A decision on a proposal is then made or it is rejected. If the proposal for reform is accepted, the new policy is then implemented either on a successful or unsuccessful basis. The linear model views the decision by policy makers as the most crucial and critical, choice and implementation is perceived as simply carrying out that which has been decided upon. The model furthermore sees successful implementation as whether or not the implementing institution is strong enough for the task. However, if implementation is unsuccessful, the usual protocol is to call for more effort to strengthen institutional capacity or even to blame failure of implementation on a lack of political will that sometime becomes the across the board 'catch-all culprit'.

The top-down approach does, however, have a few critical shortcomings in its view of how implementation is structured. For example, the approach assumes that there is a single national government, which structures policy implementation and delivers services. James Anderson (1976) as cited in Birkland (2001:267) notes that the courts, legislators, bureaucrats, community organisations and pressure groups are all involved in policy implementation. As a result of this, the focus of implementation may be situated in one agency, but several other actors will also have an influence on implementation success or

failure. The classical approach often ignores the relative ease with which implementers and interest groups can work to undermine the originally established goals of policy.

Furthermore, the classical approach to policy implementation is also criticised for its reductionist perspective of the complex nature of implementation. The fact that they assume policy success or failure primarily centres on good communication channels from the hierarchy to the implementing agent is proof thereof. Barret and Fudge (1981:16) note that the classical generation's pleas for improved communication channels often masked important issues, such as policy ambiguity, conflicting value systems between agencies and scope or limits of discretion.

The top-down 'classical' approach to policy implementation was later challenged and a new generation of scholarly thinking on the subject started to gain momentum. The following section will look into these approaches.

2.7.2. Policy implementation: a complex political and administrative process

Lindblom (1979) as cited in (Brynard, 2005:652) states that the limitations of the classical 'top-down' approach began to be underlined during the post-World War II period as it became increasingly apparent that public policy worked less as an orderly and efficient machine and more as a process of muddling through. The previous section shows that the first generation was criticised for underestimating the complex nature of implementation. As a result, the second generation set out to record the magnitude of this complexity through detailed empirical studies. The second generation of implementation scholars was focused on specifically analysing and describing the relationship between policy and practise (Paudel, 2009:39). These scholars produced a number of central lessons for policy, practise and analyses, including, for example, policy not always being able to mandate what matters to outcomes at local level and that effective implementation requires a balance between pressure and support (McLaughlin, 1987, as cited in Paudel, 2009:39). Mnculwane (2008:27) notes that the second generation conceived of policy implementation as being a complex political process that involved, amongst other things, negotiation, persuasion, coordination and bargaining.

The second generation of scholarly thinking was followed by a new approach to policy implementation, which would be known as 'bottom-up' policy making. The 'bottom-up'

approach was in direct contrast to the ‘top-down’ approach. Implementers of the bottom-up approach, also known as street level bureaucrats (Brodkin, 2000), wanted to achieve greater allegiance between policy making and policy delivery. Street level bureaucrats are those agents on the ground that implement policies at the point of contact with the policies’ target population, such as teachers, social workers and police officers, amongst others. For them (bottom uppers), policy is dependent on the interaction between actors at local level with the aim of explaining what happens when policies are implemented (Brynard, 2007b:37).

The ‘bottom-up’ approach, just like the ‘top-down’ approach, is not without its criticism. Paul Sabatier argues that the bottom-up approach places too much emphasis on the ability of street level bureaucrats to frustrate the goals of the top policy makers. He also argues that the approach fails to take into account the power differences of the various target groups. Birkland (2001:270) notes that the bottom-up approach assumes that the stakeholder groups are always active participants in the implementation process, but this is not always the case.

The fundamental difference between ‘top-down’ and ‘bottom-up’ approaches to implementation is that the one is concerned with compliance while the latter is concerned with how conflict can be alleviated by bargaining and compromise. The difference between these two schools of thought led to a new generation of thinking on implementation as a process, detailed in the next section.

2.7.3. Searching for a well-developed implementation theory

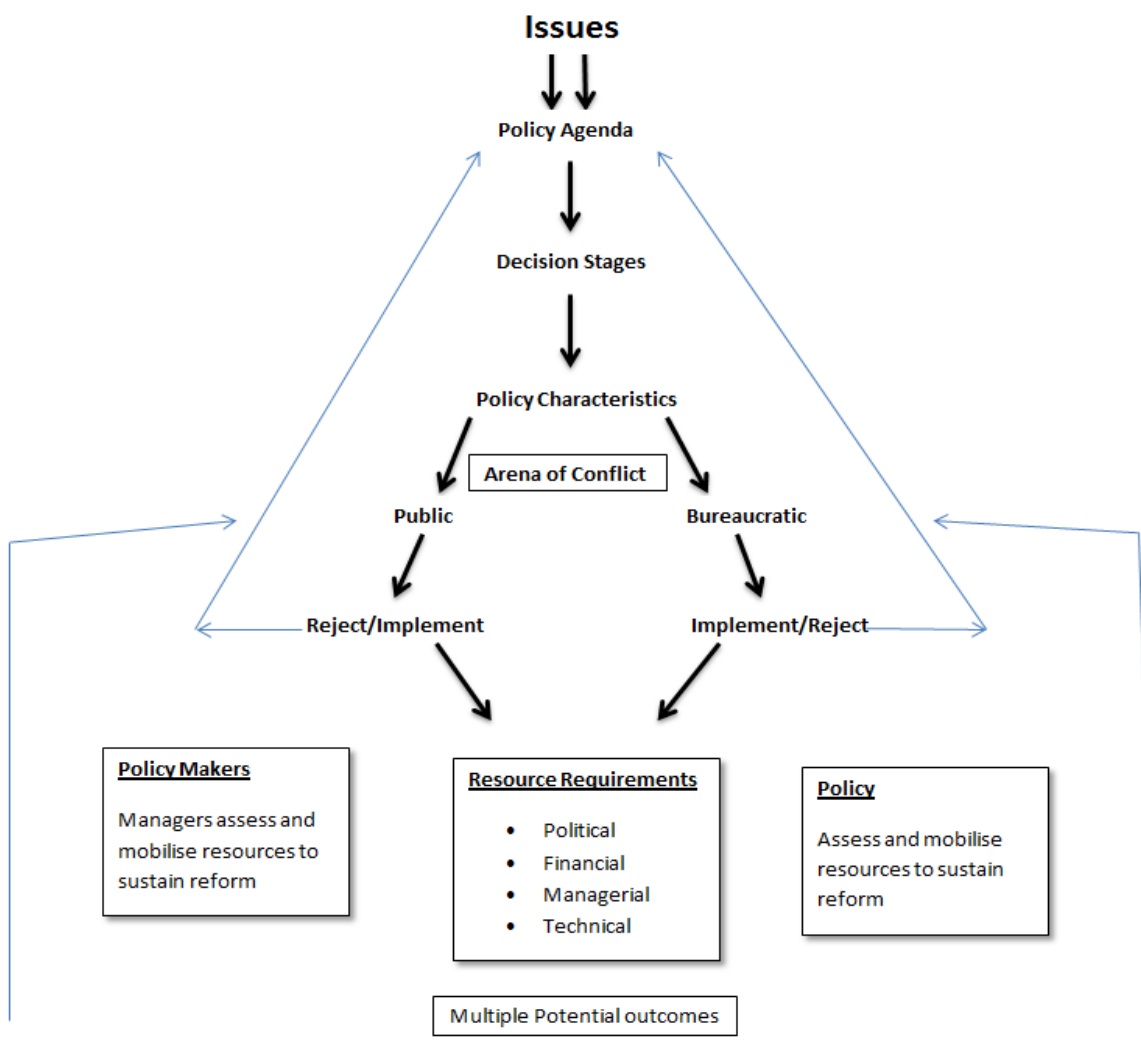
Brynard (2005:652) notes there was a realisation in the subject matter by academics that there was an absence (and need for) a causal understanding, conceptual models, analytical approaches and predictive and explanatory theories, which led to the third generation of thinking on implementation. Calista (1994) as cited in (Mthethwa, 2012:39) notes that democratic policy systems tend to move away from the traditional top-down or bottom-up approaches towards a more centrist approach, emphasising the importance of how different role players influence the policy to be implemented. The third generation studies focused on the implementation process itself rather than on why implementation fails (second generation).

The third generation of implementation analysis also brought with it new approaches, such as the evolutionary and bargaining modules. These approaches view policy implementation as a

process of negotiating, exchanging and bargaining between the interest groups, and policy is viewed as part of an on-going process of compromise and bargaining with inputs from the top and innovations from the bottom (Jordan, 1995:15). Mthethwa (2012:39) notes that the aim of this approach is to explain how policy is observed as the product of bargaining and negotiation among different interests. The approaches reflect influences from both the ‘top-down’ and ‘bottom-up’ approaches. In the implementation process policy makers can choose to use components from all or some of the above-mentioned approaches, depending on whichever of these suit the needs of the policy at hand.

The third generation and its accompanying approaches to implementation are seen as an alternative to the linear model (as discussed earlier). The method of studying implementation as a process in and of itself proposed a more realistic representation of implementation and came to be known as the interactive model (Dye, 1995; Grindle & Thomas, 1991). Figure 2.3 illustrates this mode:

Figure 2.3: Interactive Model of Implementation



Source: Brynard (2007b:37).

In the interactive model, an effort to alter the current situation through policy upsets an existing equilibrium and prompts some reaction or response from those who will be affected by the changes, as well as the stakeholders and, from time to time, the actors. The model explains that the response from the various stakeholders may occur at any point along the process. In comparison to the linear model, the interactive model sees policy implementation as a process of decision making and implementation. Interaction decides whether implementation may continue, or returns to the agenda or to any point on the model, depending on where conflict arises. In most cases some items on the agenda are acted upon, but numerous are not because of the perceptions, preferences and actions of policy makers and their appreciation of the political and economic environment.

The implementation process requires financial, managerial, technical and political resources. It is therefore critically important to protect against those opposing the policy change blocking access to these essential resources. The process endorses the fact that sometimes policy outcomes are very different from what policy makers may have conceived these to be, due to the process of change and conflict that transpires during the implementation stage.

The various implementation approaches that we have discussed in this section provide us with confirmation of just how complex the subject matter is on best practises of policy implementation. The next section will specifically look at the more detailed variables that have a direct effect on implementation.

2.8 Critical Variables that Shape the Process of Policy Implementation

Van Meter and Van Horn (1975) look at policy implementation as a complex political process. They developed a model that postulates six variables that can shape the process of policy implementation. The first variable is concerned with how relevant the standards and objectives are that are set by policy. The second asks whether the relevant resources have been made available for implementation. The third variable relates to interorganisational communication and administration activities. Fourth, asks what the characteristics of the implementing agencies are. The fifth variable relates to the social, economic, and political environment affecting the implementing organisation. The last variable relates to the nature of the implementers carrying out policy decisions (Hill & Hupe, 2002:44).

Edwards and Sharkansky (1978) developed a model for implementation based on their literature, which seeks to answer two overarching questions: “what are the primary obstacles to successful policy implementation?” and “what are the preconditions for successful policy implementation?” They identified four variables that shape policy implementation: communication, resources, disposition, and bureaucratic structures (Brynard & de Coning, 2006:189).

Mazmanian and Sabatier (1981) postulate sixteen variables that have an effect on policy implementation, which they have grouped into three far-reaching categories:

- I. The degree to which problems can be tracked: “Some social, economic and political problems are simply much easier to deal with than others”.
- II. The capability of policy decisions to effectively structure implementation: “Original policy makers can substantially affect the attainment of legal objectives by utilising the levers at their disposal”.
- III. Non-statutory variables affecting implementation: “Implementation also has an inherent political dynamism of its own”.

Smith (1973:200) highlights the complexities of policy implementation in developing countries, implying that policy implementation in the industrialised societies is less complex than in the developing world. He describes policy implementation, as a continuous process with no end or end products. Smith developed a model that is known as the ‘tension generating matrix’, which consists of four variables that can have an effect on implementation:

- The target group that the policy is focused on to change its behaviour.
- The implementing organisation’s capacity, structure and leadership qualities.
- The environmental factors that can constrain policy implementation.
- The ideal policy patterns of interactions that the policy wants to induce.

The findings from analytical research on public policy implementation prove that scholarly thinking on the subject shows it to be diverse, broad and complex. Although scholars have different models with different variables of how implementation is shaped, there are a few

variables on which they agree. Table 2.2 illustrates those scholars of policy studies who consider the same variables crucial to effective implementation.

Table 2.2: Policy Implementation Variables

Variables	This or a Related Variable is also Considered Vital by:	
Content	Lowi (1963; 1972); Smith (1973) Van Meter & Van Horn (1975) Rein & Rabinowitz (1978) Barret & Fudge (1981)	Mazmanian & Sabatier (1983) Sabatier (1986) Elmore (1985) Linder & Peters (1987)
Context	Smith (1973); Berman (1978) Van Meter & Van Horn (1975) Scharpf (1978)	Grindle (1980); Warwick (1982) O'Toole (1986); Migdal (1988)
Commitment	Pressman & Wildavsky (1973) Van Meter & Van Horn (1975)	Berman (1978)
Clients/Coalitions	Pressman & Wildavsky (1973) Berman (1978); Lipsky (1978; 1980) Rein & Rabinowitz (1978)	Barret & Fudge (1981) Warwick (1982) Sabatier (1986)
Capacity	O'Toole (1986); Cloete (1999) World Bank (1997)	Root (1996); Leipziger (1997) Campos & Root (1996)

Source: Brynard, Cloete & de Coning, 2011:146

2.8.1. The 6-C Protocol: Critical variables for studying implementation

Table 2.2 shows five critical variables on which most policy implementation scholars agree, whether they are of the perspectives of the top-down or bottom-up approach, working in different political systems, or working on differing issues (Brynard & de Coning, 2006:196). Brynard (2005:16-21) proposes the 6-C Protocol, which can be used as a way of understanding and making sense of the complex nature of implementation. This protocol provides a cross-cutting approach to understanding the complexities associated with policy implementation due to the fact that it is informed by practical findings of policy scholars and

the South African policy context in particular. The 6-C Protocol model consists of the following variables:

- Content
- Context
- Capacity
- Commitment
- Clients and coalitions
- Communication

2.8.1.1. Content

Policy can be viewed as distributive, regulatory or redistributive (Lowi, 1963). Distributive policies seek to create general welfare in society; on the other hand regulatory policies create rules of conduct with sanctions for those that fail to comply; and redistributive policies set out to change the allocation of power and/or wealth of some groups at the expense of another. Policy as ‘content’ is a function of the level and type of coercion by government. Brynard (2000:180) quotes policy implementation scholars such as Smith (1973) and Van Meter and Van Horn (1975) who suggest that, “the content of policy is not only important in the means it employs to achieve its ends, but also its determination of the ends themselves and how it chooses the specific means to reach those ends”. Najam (1995:39) highlights three important elements from Pressman and Wildavsky’s (1973: xv) work on implementation and policy as ‘content’. These three elements include (a) what the policy sets out to do – the aims of the project; (b) how it problematises the issue it sets out to solve; (c) how it aims to address the perceived problem – the choice of methods to be used. These three questions are of critical importance and will specifically be addressed in chapter three, where the researcher analyses the policy at hand.

It is important to note that the three elements mentioned above are not only important for the ways in which they affect policy content and the process of implementation, but also for how they affect the other five variables still to be discussed. For example, Rein and Rabinovitz (1978), and Van Meter and Van Horn (as quoted by Najam, 1995:40) state that the goals set out by policy will likely have a direct impact on both the commitment of those implementing the policy and the characteristics of the actor coalitions supporting or opposing particular

policies. It can then be assumed that a greater goal consensus amongst the different role players will lead to greater commitment and more supportive clients and coalitions. Furthermore, distributive, regulatory and redistributive policies call for different types and levels of implementation contexts and capacity and, as a result of this, are likely to produce different types of implementer commitment and supportive clients and coalitions (Grindle, 1980; Hargrove, 1983). Content entails goal setting, policy and strategy and programme management.

2.8.1.2. Context

Implementation scholars typically agree that a ‘context free’ theory of implementation is not likely to create powerful explanations or accurate predictions (Berman, 1980:206). The emphasis is on the institutional context of political, legal, social and environmental realities of the system (Brynard, 2000:180). O’Toole (1986:202) writes that “the field of implementation studies has yet to address, as part of its research strategy, the challenge of contextuality, beyond fairly empty injunctions policy makers, implementers and researchers, to pay attention to social, economic, political and legal setting”. Warwick (1982:182) notes that “the most common difference between programmes that are carried out and those that fail is that the former links policy intentions to environmental realities, whereas the latter proceeds as if the environment were either invariant or irrelevant”.

The emphasis here is on institutional contexts, whose own environment is moulded by the larger contexts of economic, social, legal and political realities in which it finds itself. To provide an expansive understanding of implementation, the following three elements related to ‘institutional context’ have to be performed within an institution. Firstly, identify the core institutional actors influencing, or being influenced by, the process of implementation. Secondly, trace the interest and power relationships within, and between the relevant institutions. Lastly, recognise those institutional characteristics as influenced by the overarching structure of social, economic, political and legal setting in which they function (Najam, 1995:42). The crucial contribution of ‘context’ as a variable is that it identifies the key institutional players, conflicts within and between relevant institutions, and the dynamic and evolving relationship between the goals of the policy in question and of the agencies responsible for implementing them. The concern in this study is to understand how the institutional context impacts the implementation process, more specifically via the

institutional corridor through which implementation must pass. The question is whether the Environmental Resource Management Department (ERMD) has taken the social, economic, political, environmental and legal realities into account in its implementation strategy.

2.8.1.3. Commitment

Warwick (1982:135) notes that, “effective and efficient bureaucratic structures may be in place trying to implement policy, but without commitment from those role players responsible for implementation, nothing will happen”. Brynard (2000:181) also emphasises this point by suggesting that commitment is required at all levels of the policy implementation process, from state level down to street level bureaucrats, and secondly that commitment influences, and is in turn influenced by, all five variables associated with the 6-C Protocol. The variable is most often associated with both the top-down and bottom-up perspectives and is seen as being critical to the effectiveness of policy implementation. The top-down perspective views ‘commitment’ as being produced primarily by the policy content and capacity, both of which can supposedly be controlled from the top. Van Meter and Van Horn (1975:475) note that when implementers lack commitment, a top-down perspective might attempt to regulate discretion by trying to change the standard operating procedures (context); influence implementer disposition through providing more resources (capacity); or designing more rigid evaluation routines within the policy (context). Warwick (1982:135) states that it is important to remember that, “the true test of commitment is not whether implementers execute a policy when their superiors force them to, but whether they carry out a policy when they have the option of not doing so”.

A bottom-up perspective, on the other hand, as stated by Najam (1995:48), might attempt to view implementer commitment in conjunction with indications from clients and coalitions as a basis for inspiring adaptive redesign of the policy at street level. This would also entail the changing of content, capacity, and institutional contexts, but will do so in response, rather than in retaliation, to implementer commitment.

2.8.1.4. Capacity

The variable of ‘capacity’ in the literature of implementation has been viewed as an anomaly with regards to the other five variables. This is because ‘capacity’ has to do with the allocation of resources needed to successfully achieve implementation. However, it is important to note that provision of the necessary resources is by no means a simple matter; in fact, just knowing what the necessary resources are can be a non-trivial problem in itself. Brynard & de Coning (2006:199) note that capacity in the public sector refers to the structural, cultural and functional ability to implement the policy objectives of government. The resources required for this capacity are both tangible (financial, human and technological) and intangible (leadership, endurance and motivation). Grindle (as quoted in Brynard, et al., 2012:148) states that the economic, technological, administrative, political, cultural and social spheres within which action is taken should also be conducive and sympathetic to successful implementation. These statements reflect the importance of adequate capacity building within institutions to ensure that they have the means to efficiently and effectively improve implementation.

Capacity also effects and is affected by the other five variables mentioned in this section. This is particularly the case between content and capacity, in that the two will in essence define and redefine each other. Najam (1995:51) notes that standard operating procedures (content) are more likely to shape what form of capacity provisions is most appropriate to which agency, just as the provision of certain forms of capacity (resources) may themselves reshape standard operating procedures. Brynard, et al. (2011:148) state that the capacity that is required to drive policy implementation is no longer solely credited to government departments. There is greater pressure than ever for quick and reliable delivery of public services that necessitate the use of various modes of service delivery in the public sector. The Canadians use the term ‘alternative service delivery mechanisms’ to describe this approach. Examples of ‘alternative service delivery mechanisms’ being used in government settings are decentralisation, corporatisation, joint ventures, partnerships, outsourcing, privatisation, assistance, and regulation.

In assessing the IMEP, it is vital to determine whether sufficient or adequate resources, implementation tools, skills, and controlling mechanisms of an oversight and coordinating manner have been provided to ensure that successful implementation is carried out.

2.8.1.5. Clients and coalitions

The variables discussed thus far have focused almost completely on government/bureaucratic mechanisms for delivering policy. Implementation scholars have come to realise that the effectiveness of any policy implementation process depends equally on those target groups to whom the policy is delivered. Furthermore, clients are not the only non-state actors who can affect implementation. Coalitions of interest groups and opinion leaders can be equally influential. Rein and Rabinovitz (1978:314) emphasise this point when they state that, “a power shift among the different outside interest groups produces a corresponding shift in the implementation process”. Elmore (1979:610) considers the finding that policy implementation is in some way affected by the formation of local coalitions, which are themselves affected by the policy, to be one of the “most robust” findings of implementation research. Brynard (2000:185-186) notes that government should identify those stakeholders who can have a real impact on the policy implementation process. Identifying these stakeholders can hold challenges. There is a risk of limiting the scope of enquiry, which can leave out key actors, while on the other hand there is also the risk of having too many actors, through which any exploratory investigation becomes unmanageable. It is therefore of critical importance to ensure that the key stakeholders have been identified rather than all identifiable actors.

As with the other five variables discussed in this section, clients and coalitions will influence, and in turn be influenced by, the other five variables. Warwick (1982:189-190) notes that, “the transactions most vital to implementation are those between the programmes and the clients”. Furthermore, he goes on to add that “a programme’s treatment of its clients and client reaction to the programme are interconnected, but not in any simple or deterministic fashion” (Warwick, 1982:176). It is evident that this interconnectedness moves through the web-like maze that links all the six variables in the 6-C Protocol.

2.8.1.6. Communication

In addition to the 5-C Protocol, communication is seen as critical variable for implementation. Communication is regarded today as making up the sixth ‘C’ of implementation. Brynard (2005:21) notes that it could be argued that ‘communication’ has always been a part of all the above-mentioned variables, but it is important to single it out as

a variable in its own right. For example, a rich cultural country such as South Africa, which has 11 official languages, underscores the importance of communication as a critical variable to policy implementation and indeed successful implementation.

The 6-C Protocol discussed above is used in this study as a useful vehicle for understanding the complexities of policy implementation. Literature and practise on the subject has shown that the six variables are likely to act together, often simultaneously, with any change in one variable producing change in the others. Through researching the literature on policy implementation it is clear that there is not one specific approach to successful policy implementation. However, Brynards 6-C Protocol (2005) provides the researcher with an approach that can be used to assess the implementation process of the City of Cape Town's Integrated Metropolitan Environmental Policy.

2.9 Programme Management and Public Policy Implementation

It is important to take note of the importance of programme management as an instrument of policy implementation. Programme management has contributed to improved service delivery not just in South Africa, but also all across the world. Van Baalen and de Coning (2011:170) emphasise this point when they note that, "programme management has proven to be a vital ingredient and interface between policy development, planning and project management".

For this study it is necessary to understand the role of programmes in the policy process, as policies are frequently implemented through the use of programmes. This suggests that it is programmes and not policies that constitute the key input for policy implementation. These programmes consist of diverse activities and projects and, to ensure effectiveness and efficiency, policy implementation needs to be managed successfully. Van Baalen and de Coning (2011:173) define programme management in a public sector context as "the purposeful management and coordination of a portfolio of related projects on the basis of geographical targeting, sectoral mix and functional focus in order to achieve programme objectives and outcomes". Pellegrinelli (1997: 142-143) provides the following benefits of programme management. Firstly, it provides greater project visibility and more comprehensive reports on the progress of projects, which senior managers require to ensure that they are on the right track to achieve the implementation objectives. Secondly, it

prioritises projects, with each project's role within the organisation's overall development being specifically identified and managed. Thirdly, it provides for more efficient and appropriate use of resources. Fourthly, it ensures that projects are driven by organisational, political and/or social needs, so that project or line managers' own personal agendas are kept in check. Finally, it leads to better planning and coordination, where incidents of work backlogs and duplication of functions are reduced. De Coning and Gunther (2009:50) agree with Pellegrinelli (1997:143) when he concludes, "Although these advantages cannot be taken for granted, programme management can use resources and avail them to projects and can keep up the drive to maximise implementation benefits".

2.10 Conclusion

As shown by the literature on the subject of policy implementation, there is not one overarching comprehensive theory on this process. Furthermore, policy implementation does continue to hold great interest for scholars and policy makers because it is a critical stumbling block in the policy process and also due to the fact that it is one of the most heavily utilised areas of policy analysis. The researcher observed this point when it became apparent that policy implementation had been studied from various perspectives with the use of different theoretical tools. These different policy implementation approaches have served to provide governments with an alternative means of addressing implementation challenges. The different approaches and models of implementation gave rise to a kind of consensus regarding important variables that policy makers and implementers need to consider in order to ensure that successful effective policy implementation is realised.

It is important to note that, while public policy can be defined in more than one manner, implementation itself moves from set political goals to results on the ground. Kendal (2008:1) notes that, "implementation of policy in the public and private service is increasingly being scrutinised due to its crucial role, especially in the delivery of programmes". It is for this reason that more needs to be done to develop a sufficient understanding of the difference between theory and practise when public managers implement policies. Furthermore, it is of great importance to identify, using the six variables discussed in detail in the above section, how we can best influence policy on a practical level to ensure that we meet our implementation goals.

In closing, the task of this literature review was to review the literature on policy and, more specifically, policy implementation in general with a goal of the researcher gaining an in-depth understanding of implementation as a process on the basis of the identified critical variables. The following chapter will identify key legislative – and environmental – policy frameworks in South Africa.

Chapter 3: Policy and Legislative Considerations for Environmental Governance

3.1 Introduction

In Chapter 2 the discourse on policy implementation was discussed. The chapter revealed the complexities of policy implementation and how certain variables have a direct effect on its success or failure. For this study the focus is on assessing the implementation of sustainable environmental policy. The literature review indicates that the process of policy making does not operate in isolation and, for this reason, it is important to look at the South African legislative framework that informs and guides the IMEP of the COCT. The City of Cape Town is mandated by environmental legislation to comply with certain requirements set out in these acts in order to ensure efficient and effective service delivery.

The main aim of this chapter is to provide the legislative and contextual background of environmental management within the public sector. The following legislation will be discussed and will provide more information on how South Africa's legal mandate protects the natural environment for the needs of both current and future generations:

- Constitution of the Republic of South Africa (No. 108 of 1996)
- White Paper on Environmental Management Policy for South Africa
- The National Environmental Management Act (No. 62 of 2008)
- The National Environment Management: Protected Areas Act (No. 57 of 2003)
- The National Environmental Management: Biodiversity Act (No. 10 of 2004)
- The National Environment Management: Air Quality Act (No. 39 of 2004)
- The National Environmental Management: Integrated Coastal Management Act, 2008 (No. 24 of 2008)
- The National Environmental Management: Waste Act (No. 59 of 2008)
- National Heritage Resources Act (No. 25 of 1999)

3.2 The South African Environmental Policy and Law Context

The legislative, policy and institutional frameworks for environmental management in the Republic of South Africa have undergone a tremendous transformation process from the pre-

1994 Apartheid era environmental laws. Apartheid era environmental law was fragmented and dispersed amongst a wide selection of statutes and was administered by a multitude of regulatory authorities (Fuggle, Rabie, Strydom & King, 2009:69). The democratic election in June 1994 was the first stepping-stone in a series of changes to legislative, policy and institutional frameworks of environmental law in South Africa.

Before democracy, civil society had little influence on matters regarding the management of the environment and was not represented in any of the formal structures set up to consider its use and conservation. Van der Linde (2006:5) notes that the promulgation of the Constitution (1996) provided the potential for accelerating the development of South African environmental law. The Constitution of the Republic of South Africa is the supreme law of the country. The Constitution grants every person the right to an environment that is not harmful to their health or wellbeing, furthermore it also grants the right to have the environment protected through reasonable legislative and other measures that prevent pollution, ecological degradation, promoting conservation and securing ecologically sustainable development and the use of natural resources, while at the same time promoting justifiable economic and social development.

It is evident that Chapter 2 of the Constitution, the Bill of Rights, firmly ingrains environmental protection as a human right. Furthermore, section 24 enforces a constitutional duty on the state to protect the environment through legislative measures. The Bill of Rights also includes a few additional clauses and provisions that may potentially have an impact on the protection of the environment. These provisions include the right to life (section 11); property (section 25); social security, water, food and health care (section 27); and access to information (section 32).

3.3 White Paper on Environmental Management Policy for South Africa

In view of the requirements in the Constitution (1996) with regards to environmental rights, the White Paper on Environmental Management Policy (hereafter referred to as EMP) was published in the Government Gazette on the 18th of May 1998. The policy states that people are part of the environment and at the centre of concerns for its sustainability.

Aim of this policy:

The overarching aim of this policy is to achieve and maintain sustainable development. The intention is to move away from state development that is unrestrained and environmentally insensitive, towards sustainable development with the aim of achieving an environmentally sustainable economy that is in balance with ecological processes (Republic of South Africa, 1998).

Strategic goals of the policy:

- To create effective institutional frameworks and legislation. The goal is to create an effective, adequately resourced and coordinated institutional framework together with an integrated legislative system, and to build institutional capacity in the three spheres of government to ensure the effective and efficient implementation of this policy.
- Sustainable resource usage and environmental impact management. The second goal is to be achieved through promoting equality of access to, and sustainable use of, natural and cultural resources while integrating environmental impact management with all economic development activities to achieve sustainable development.
- Holistic and integrated planning and management. Achieving this goal will be dependent on developing the necessary mechanisms to ensure that environmental considerations are effectively integrated into existing and newly formed government legislation, policies, economic development planning processes and all economic activity.
- Participation and partnerships in environmental governance. This will be achieved through the establishment of mechanisms and processes to guarantee effective public participation in environmental governance.
- Empowerment and environmental education. This goal will be achieved through promoting environmental literacy, education and empowering the people of South Africa.
- Information management for sustainable development. Information management is a very important element for ensuring sustainable environmental management. This goal will be achieved by developing information management systems that will

provide information to interested and affected parties, which will support effective environmental management.

- International cooperation. The final strategic goal will depend on developing the necessary tools to deal effectively, and in the national interest, with international matters affecting the environment.

(Republic of South Africa, 1998)

The EMP of the Republic of South Africa provides the key macro policy and legislative context for environmental management in South Africa.

3.4 The National Environmental Management Act No. 62 of 2008 (NEMA)

Aim of this Act:

The National Environmental Management Act No. 62 of 2008 (hereafter referred to as NEMA) can be viewed as the primary legal framework that ensures the concretisation of the environmental rights embedded in sections 24 of the Constitution by all organs of state as well as private parties in South Africa. NEMA was developed to give effect to the White Paper on Environmental Management Policy of 1998. The Act repeals the greater part of the Environmental Conservation Act (No. 73 of 1989). NEMA has been amended on three occasions since its introduction as an environmental statute. Amendments include the following:

- National Environmental Management Amendment Act (No. 46 of 2003)
- National Environmental Management Second Amendment Act (No. 8 of 2004)
- National Environmental Management Third Amendment Act (No. 62 of 2008)

The Act was also the first piece of legislation to introduce the concept of ‘sustainable development’. NEMA defines sustainable development as “the integration of social economic and environmental factors into planning implementation and decision making so as to ensure that development serves present and future generations” (Republic of South Africa, 2008).

NEMA sets out to provide for a platform of cooperative environmental governance through establishing certain principles for decision making on matters affecting the environment, institutions that will promote cooperative governance in order to coordinate environmental functions exercised by organs of the state, and to provide for matters connected therewith (Section 2 of NEMA). The principles set out in section 2 apply to all organs of state that can significantly affect the environment in which they operate. Section 2(1)(c) states that these principles serve as guidelines to which any organ of state must adhere when taking any decision in terms of any legal provision concerning the protection of the environment. In relation to this study, this means that the COCT is bound by the principles of section 2 when it exercises its powers – it has to act in a manner consistent with those principles in all decision making situations that may significantly affect the environment. Du Plessis (2009) notes the Constitution, 1996, provides municipalities with legislative competency over a number of functions that are relevant to the environment. The Local Government Municipal Systems Act (No. 32 of 2000) enforces this statute as it places a duty on the municipalities' council to promote and undertake development in the municipality (sec 4(2)(g)) and to promote a safe and healthy environment in the municipality (sec 4(2)(1)). Furthermore, when the municipality exercises its powers it must do so in a way that is responsive to the environmental needs. In this sense it is related to section 2 of NEMA, as it does not bestow any powers on the municipality, but rather sets out how the municipality should exercise the powers that it has. Thus, where a municipality has power, it must exercise that power in a way that promotes sustainable development.

Specific reference should also be made to sec 28(1) of NEMA. This places a duty of care on “every person who causes, has caused or may cause significant pollution or degradation of the environment”. That duty is to “take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment”. NEMA recognises that many people living in South Africa live in an environment that is harmful to their health and wellbeing. The state must promote, protect and fulfil the social, economic and environmental rights of everyone and, in doing so, strive to meet the basic needs of previously disadvantaged communities.

3.4.1 Environmental impact assessments and NEMA

An environmental impact assessment (hereafter referred to as an EIA) can be defined as “the administrative or regulatory process by which the environmental impact of a project is determined in a systematic and scientific manner” (African Union Report, 2014:10). Glasson, Therivel and Chadwick (2012:3) note that the term EIA describes a process by which information regarding the environmental effects of a project is collected, by both the developer and from other sources, and the planning authority takes this information into account when forming their judgements on whether the development should go ahead or not. The process of an EIA involves some systematic stages that include screening, scoping, assessing and evaluating environmental impacts; suggesting measures to mitigate those impacts; reporting; reviewing; and making decisions (Tshautshau, 2013). It should be noted that South Africa’s EIA legislative frameworks are of an international standard. Chapter 5 of NEMA deals directly with integrated environmental management and provides the foundation for the EIA regulations in South Africa. EIAs, as part of legislation, have been in existence since the 1980s, but were really only enforced through regulation during the 1990s.

Jennings (2011:12) notes that the formalisation of the EIA process in South Africa has defined its use to a permitting instrument. According to Youthed (2009) this has produced the perception that an EIA process ends with the granting of environmental authorisation or a refusal to grant environmental authorisation. Historically, environmental authorities in South Africa lacked the required capacity and organisational structure to follow up on EIAs. Jennings (2011:12) states that, as a result of this, there was a culture of non-compliance with the permit conditions of environmental authorities, and the feedback loop, which must provide information on the practicality, monitoring and enforceability of conditions of authorities, was lacking. The old EIA regulations that were made in terms of the Environment Conservation Act (No. 73 of 1989) were replaced by new regulations made in terms of Chapter 5 of NEMA (2006). Furthermore, these regulations have been subsequently revised as a result of comments made by stakeholders for the need to accommodate mining activities, and the need to align with NEMA amendment acts and other national environmental management acts (DBSA, 2012:326).

3.5 Sectoral Environmental Management Acts (SEMAs)

After the promulgation of NEMA, as discussed earlier in the chapter, the South African legislature went on to design and promulgate a number of sector-specific environmental statutes. It can be said that in some cases SEMAs serve to allocate specific environmental functions and duties to local governments. In the following section, a review is provided of SEMAs and the provisions relevant to local government.

3.5.1 The National Environment Management: Protected Areas Act No. 57 of 2003 (NEMPAA)

Aim of this Act:

The National Environment Management: Protected Areas Act No. 57 of 2003 (hereafter referred to as NEMPAA) reinforces NEMBA with regards to its aim, which includes providing for the protection and conservation of ecologically feasible areas, including those of natural landscapes and seascapes.

The purpose and objectives of this Act:

The Act set out to provide for the following three things: the conservation and protection of ecologically viable areas that are representative of South Africa's biological diversity, including its natural seascapes and landscapes; the establishment of a national register of all the national, provincial and local protected areas for the management of those areas in accordance with national norms and standards; to ensure the sustainable use of natural and biological resources; and finally, to promote intergovernmental co-operation and public consultation in matters concerning protected areas and for matters in connection therewith (Republic of South Africa, 2003). Section 5(1) of the Protected Areas Act states that the Act must be interpreted and applied in accordance with the national environmental principles and be read in conjunction with the appropriate provisions of the National Environmental Management Act. Sec 9 of the Protected Areas Act notes the system of protected areas in South Africa consists of special nature reserves, nature reserves, world heritage sites, specifically protected forest areas and forest wilderness areas as declared in terms of the National Forest Act (No.84 of 1998), and mountain catchment areas as declared in terms of

the Mountain Catchment Areas Act (No.63 of 1970). It is important to note that sec 38(3) of the Protected Areas Act makes provision for the person, organisation or organ of state to which the management of a protected area has been allocated in terms of subsection 38(1) and 38(2) is the management of authority of the area for the purpose of this Act.

Obligation of local government:

NEMPAA introduces certain obligations to local government by which it needs to take into account any NEMPAA norms and standards that apply in the jurisdiction of the municipality or to a local protected area (section 11); must participate in any consultation process regarding the declaration of a protected area (section 31 and 32); be required to fulfil any obligation which may arise from the assignment of the management of a particular protected area towards the municipality (section 38); must assist in the development of a management plan of a protected area within the municipalities jurisdiction (section 39); and is required to draft by-laws for the restriction of activities in local protected areas. NEMPAA is clear on the possible role and duties of local government, but the precise parameters of this role and duties may still be unclear. It is important to note that protected areas fall outside the constitutional functional responsibilities of local government, a fact which, if not addressed adequately, could result in this becoming an assignment of unfunded mandate to local government (du Plessis, 2009:77).

3.5.2 The National Environmental Management Biodiversity Act No. 10 of 2004 (NEMBA)

The aim and objectives of the Act:

The objectives of the National Environmental Management: Biodiversity Act No. 10 of 2004 (hereafter referred to as NEMBA) are found within the framework of NEMA and provide for the following. Firstly, for the protection of species and ecosystems that warrant national protection. Secondly, it ensures the sustainable use of indigenous biological resources. The Act also provides for fair and equitable sharing of benefits arising bio-prospecting involving indigenous biological resources and also provides for co-operative governance in biodiversity management and conservation (South Africa, 2004). Section 39(2) of NEMBA states that

local government has the obligation to align any municipal environmental conservation plan with the norms and standards contained in the Act; to stand by the provisions of any biodiversity management agreement regarding the implementation of a biodiversity management plan and to ensure the alignment of a municipalities' integrated development plan (IDP) with the biodiversity management plan (Western Cape, 2003). It is evident that local government has mandates in terms of key biodiversity law despite the fact that nature conservation is not listed as an area of responsibility of local government in schedule 4- and 5B of the Constitution (1996). Du Plessis notes that "the implementation of NEMBA in the sphere of local government could be challenged by factors such as the lack of clear indications as to the shared and divided responsibilities of local and district municipalities and by the lack of specialised knowledge on the content of the National Biodiversity Framework".

3.5.3 The National Environment Management: Air Quality Act No. 39 of 2004 (NEMAQA)

Aim of this Act:

The key aim of the NEMAQA is to reform law with regards to air quality in South Africa to ensure that air quality regulation is aligned with the environmental rights set out in the Constitution (1996) and that they are aligned with South Africa's international environmental law obligations.

Objectives of this Act:

The objectives of the NEMAQA are as follows:

- a) To protect the environment by providing reasonable measures for:-
 - i. The protection enhancement of the air quality in South Africa
 - ii. Preventing air pollution and ecological degradation; and
 - iii. Securing ecological sustainable development, while at the same time promoting justifiable economic and social development.

- b) To give effect to section 24 (b) of the Constitution, 1996, to order to enhance the quality of air for the sake of securing an environment that is that is not harmful to the health and wellbeing of the people.

Obligations of local government:

The statute imposes certain obligations on local government. These obligations include that local authorities should commonly seek to protect and enhance air quality in agreement with NEMA environmental principles; to prevent pollution and degradation of air quality (section 7(2)); to abide by national norms and standards which are contained in the national air quality framework (section 3 and 5); to promote air quality management; to comply with international related law obligations, such as the Kyoto Protocol; to abide by national norms and standards for municipalities to monitor ambient air quality and point, non-point and mobile source emissions (section 7(3)); to familiarise itself with listed controlled fuels and related standards (section 23 and 24); and must acquaint themselves with the necessary measures with respect to noise, dust, offensive odours and applicable standards (section 25). Of particular importance is the provision in the NEMAQA, which states that, metropolitan and district municipalities must implement the country's atmospheric emissions licencing systems and furthermore must, for this purpose, perform the functions of licencing authorities. It is apparent from this that the NEMAQA sets out somewhat profound obligations relating to local governments. Municipalities therefore play a key role in the management of air quality.

3.5.4 The National Environment Management: Integrated Coastal Management Act, 2008 (NEMICMA)

Aim of this Act:

The key aim of the National Environmental Management: Integrated Coastal Management Act No. 24 of 2008 (hereafter referred to as NEMICMA) is to establish a legal and institutional framework that visibly defines the status of coastal land and waters and sets out the respective roles of the public, the state and other users of the coastal zone, while

facilitating a new co-operative and participatory approach to managing the coast through national, provincial and local coastal management programmes.

Objectives of this Act:

The objectives of the NEMICMA, are as follows:

- Determining the coastal zone of the Republic of South Africa;
- To provide, within the framework of NEMA, for the coordinated and integrated management of the coastal zone by all spheres of government in agreement with the principles of co-operative governance;
- To preserve and enhance the status of coastal public property as being held in trust by the State;
- To secure equality of access to the opportunities and benefits of coastal public property; and
- To give effect to South Africa's obligations in terms of international law regarding coastal management.

(South Africa, 2008)

Obligations on local government:

The statute imposes certain obligations on local government. These obligations include that each municipality whose area includes coastal public property must create a by-law that defines strips of land adjacent to such coastal public property as coastal access land in order to secure public access to that coastal public property (section 18). Section 18(5), states that a municipality may, on its own accord and/or in response to a request made by a organ of state or any other affected or interested parties, remove the designation of any land as coastal access land. Section 20(1) of this Act summarises the responsibilities of municipalities with regards to coastal access land. Provision is made that a municipality in whose area coastal access land falls must control and maintain the use of activities on that land; be required to protect and apply the rights of the public to use the land to gain access to public coastal property; must make sure that provision and the use of coastal access land and the associated

infrastructure does not hold adverse effects on the environment; and is required to report on the implementation measures, describe and/or indicate all the coastal access land in any municipal coastal management programme and in any spatial development framework of a municipality, which is prepared in terms of the Municipal Systems Act.

In terms of section 20 (2) of the NEMICMA, a municipality may make by-laws towards the implementation of all the previously mentioned provisions. Section 3(a)(b) of this Act states that, in fulfilling the rights contained in section 24 of the Constitution (1996), the state, through its functionaries and institutions implementing this Act, must act as trustees of the coastal zone. The directives from the MEC to the municipality in section 28(1) state that the MEC may, in writing, direct a municipality to take specified measures if the MEC is satisfied that the municipality is not taking adequate measures to prevent or remedy adverse effects on the coastal environment; adopt or implement a municipal coastal programme or give effect to the provincial coastal management programme. It is important to note that the marine environment does not fall within the realm of schedule 4B and 5B of the constitution as powers of local government, but the obligations and duties of local government in terms of the NEMICMA are quite clear. The legislature makes good provisions in terms of administrative controls, which will help local government fulfil the duties imposed on it by the NEMICMA, as well as for with measures to facilitate intergovernmental coordination.

In 2009, the COCT prepared a draft Coastal Protection Zone (hereafter referred to as CPZ) programme. The 2014 target for the Environmental Resource Management Department (ERMD) was to formalise and implement an effective coastal protection zone across the whole length of the COCT's coastline, as well as to formally manage the CPZ to ensure environmental integrity, conservation of coastal ecosystems and enhance recreational opportunities while protecting the natural resources of the city (City of Cape Town, 2009-2014). Section 17(a) of the Integrated Coastal Management Act (2008) notes that the purpose of the CPZ is to enable the use of land that is situated adjacent to coastal public property or which plays a significant role in coastal ecosystems to be managed, regulated or restricted in order to protect the ecological integrity, character and the economic and social value of coastal public property.

3.5.5 The National Environmental Management: Waste Act, 2008 (NEMWA)

Aim of this Act:

The key aim of this act is to provide mandatory requirements that address the production and disposal of solid and liquid waste, as well as the safe collection, transport and disposal, and reduction of illegal dumping.

Objectives of the Act:

The overall objective of the National Environmental Management: Waste Act (2008) is to protect social health, wellbeing, and the environment by providing reasonable measures for the following:

- Reducing the consumption of natural resources;
- Avoiding and reducing the generation of waste;
- Recycling, reusing and recovering waste;
- Preventing pollution and ecological degradation; and
- Securing ecologically sustainable development while promoting social and economic development.

(Republic of South Africa, 2008)

Furthermore, the Act also sets out to ensure that the above-mentioned measures are dually complied with. The Act consist of two important sections: chapter 2, which contains the National Waste Strategy norms and standards; and Chapter 4, which sets out in detail the waste management measures contained in the Act. Section 3 of the Act notes that, in fulfilling the rights enclosed in section 24 of the Constitution (1996), the state, through the organs of state responsible for implementing this Act, must put in place “uniform measures that seek to reduce the amount of waste that is generated and, where waste is generated, to ensure that waste is re-used, recycled, and recovered in an environmentally sound manner before being safely treated and disposed of” (Republic of South Africa, 2008).

3.5.6 The National Heritage Resources Act No. 25 of 1999 (NHRA)

Aim and objectives of this Act:

The aim and objectives of the NHRA are as follows:

- To introduce an integrated and co-operative system for the management of national heritage resources;
- To promote good governance at all levels;
- To lay down general principles for governing heritage resource management throughout South Africa;
- To set the norms and standards that are essential for the management and protection of heritage resources; and
- To provide for the protection and management of conservation-worthy places and areas by local authorities.

(Republic of South Africa, 1999)

Obligations of local government:

The obligations that this statute impose on local government authorities include that a local authority must stand by and consult the general framework and recommendations for heritage management in South Africa (section 4); must ensure the local level management of heritage resources (section 8); provide for the maintenance and conservation of the heritage resources under its control in accordance with the standards and procedures set out in regulations by the South African Heritage Resource Agency (SAHRA); and must stand by the principles and procedures for decisions by the municipality regarding the administration and management of the national estate of an assigned authority (section 10). Local government must also provide protection of a heritage area through the provision of its planning schemes and/or by-laws, which should be jointly approved (section 31 (7) and section 54). Furthermore, it is important that a municipality may designate any area of land to be classified as a heritage area on the grounds of its environmental – and cultural – interest, or the presence of heritage resources, provided that it first consults with the provincial heritage resources authority and the owners of the land in the area and/or any affected area (section 31(5)).

3.6 Conclusion

The areas of responsibility for local government environmental competence in terms of schedules 4B and 5B of the Constitution (1996) form a small part of the environmental duties and functions of local government. Du Plessis (2009:86) notes that, even though the 'environment' falls within the joint legislative and executive competence of national and provincial government, local government is the only sphere of government to which the Constitution (1996) explicitly assigns not only the general duty to realise the environmental right, but also places an additional obligation on local government to promote a safe and healthy environment.

The South African environmental legislative framework has transformed the manner in which we engage in social and economic activities with regards to protecting and maintaining an environment that is conducive to our development and wellbeing. These statutes direct policies, strategies and programmes in all three spheres of government to ensure that the rights, as set out in section 24, the Bill of Rights, are upheld and complied with. This chapter shows that local government has specific obligations with regard to environmental management that should be incorporated into its policy planning processes to ensure that it complies with the regulation. Furthermore, the review of environmental legislation in this Chapter has shown that the duties and functions that it bestows on local government differ in scope and function. The IMEP and its lead department the ERMD of the City of Cape Town has to comply with these statutes when implementing its environmental programmes and projects.

Chapter 4: Research Design and Methodology

4.1 Introduction

Chapter one of the thesis provides an introduction to the context, background and reasoning behind the study. Chapter two provides a literature review on the discourse of policy implementation. Chapter three provides a legislative and contextual background of environmental management within the public sector. This chapter will describe the research design and methodology that was chosen to provide the context within which the presentation of the findings and analysis thereof will take place.

The purpose of this research report, as mentioned in chapter one, is to assess the implementation process of the Integrated Metropolitan Environmental Policy and its Environmental Agenda, with reference to the Environmental Resource Management Department of the City of Cape Town, which is responsible for its implementation. The methodology chosen to conduct this study was designed specifically to gain answers to the core objectives set out in chapter one. Firstly, to assess the Integrated Environmental Policy and its Environmental Agenda of the City of Cape Town and, secondly, to provide some provisional explanations for the current state of implementation on the basis of Brynard's 6-C Protocol.

4.2 Choosing the Correct Research Design

In order to successfully answer the research question and objectives, the researcher needs to adopt a relevant research design. In this instance, the researcher has decided to construct the study around a non-empirical and qualitative empirical research method. Non-empirical research is grounded on secondary research and will comprise of a literature review to familiarise the researcher with the unit of analysis. This will allow for an inclusive and well-integrated study of the literature. In order to provide the necessary answers to the research problem, a qualitative empirical study has been conducted. Existing and primary data of a textual nature will be used and analysed within this study. Existing data has been extracted from relevant policy and strategic documents, such as the IMEP and its Environmental Agenda as well as other pertinent documents that have been analysed in order to identify the objectives and other important aspects within the policy context. Furthermore, the progress of

implementation and even the lack thereof is often captured in the relevant policy documents and reports. On the other hand, primary data has been extracted through the use of a research schedule on a small sample of individuals within the ERMD who are responsible for the implementation of the IMEP and who are familiar with the policy. These officials were primarily identified on the presumption that they had the relevant knowledge and information, which the research required to reach informed conclusions for the study.

In order to dually represent the benefits of choosing such as study, the challenges that such a study might hold must also be considered. Firstly, the researcher needs to take note of the fact that the research design adopted could pose the possibility of the researcher being biased with regards to analysing relevant documents and making conclusions based thereon. Secondly, the instrument that the researcher chooses for analysing data can be based on a random choice or whim, rather than any reason or system. As a result the researcher, when faced with various analysing instruments or tools, might choose the wrong one for the study. Thirdly, the identification of pertinent documents to analyse also presents a challenge. When faced with a lot of information, the researcher must work through all these texts and try to gain a holistic understanding of the unit of analyses. By the same token, access to certain information might be restricted or there might be a delay in gaining access to certain documents, which also causes scheduling problems with regards to the study.

Furthermore, the research design based on the research schedule has its own particular challenges. These are experienced in costs and time constraints that the researcher might have while gathering the data necessary for the study. Other issues can include things such as the number of questions the researcher presents to his or her respondents, and the possibility that the identified interviewee may not be able to partake in a previously arranged appointment.

4.3 Methodology

Taking on a specific research design advocates that the researcher concisely explains how he/she will go about implementing the set out design for the purpose of the study. The following section will focus on this methodology.

4.3.1 Research methodology

In order for the researcher to implement the research design, there has to be a proposed explanation of the instruments that will be used to do so. The process of implementing this design has a few techniques, which the researcher will briefly clarify. The technique used includes such things as conducting a textual analysis to consider the content of the IMEP and its Environmental Agenda. The researcher uses this technique to suitably comprehend the policies' responsiveness, or lack thereof, to its implementation. The critical analysis of the intervention (policy) is important to the point that it lays bare the fundamental aspects of the policy. This also applies to the fact that non-implementation of a given policy possibly cannot always be blamed on those responsible for implementation. Rather, the issue might be that there were problems with the programming of the policy. This issue usually flares up when programming isn't thought of as part of implementation. As a result of this, the IMEP and its Environmental Agenda have been subject to analyses, which have in turn enabled the researcher to identify the critical problem it sets out to solve, its objectives, and other important aspects comprising its content. Strategic documents of the ERMD in the form of business plans and reports have also been analysed, in order to produce data pertinent to policy implementation.

Structured in-depth interviews were held with a small number of officials within the ERMD who are familiar and responsible for implementation in order to gain valuable data regarding the policy. As a result, one department head (Environmental Policy and Planning) four managers (Environmental Policy and Planning; Major Programmes and Projects; Environmental Cooperate Governance; and Biodiversity Management) and an ERMD consultant were selected on the basis that they were recommended as the most appropriate candidates to interview. For the structured interviews, a research schedule was developed and sent out to the interviewees before the interview itself was conducted. This was done to ensure that the respondents could work through the questions thoroughly in order to provide the best possible answers to the questions when the time of the interview came. It is important to note that, while the questions were developed to gain the pertinent information from those responsible for implementation, questions were also developed specifically to align the inquiry with the variables of the 6-C Protocol (Annexure D) as it is these instruments that are finally used to assess the implementation of the policy.

4.3.2 Data yielded

The analyses of the policy documents of the IMEP and its Environmental Agenda have yielded interesting data and identified the fundamental elements of the policy. This is because of the fact that these documents were subjected to an intense analysis by the 6-C Protocol and in the process provided information that was used to make informed conclusions on the study. Data was also gained from other forms of documents (business plan, reports), which provided relevant information based on which the researcher could come to informed conclusions. The data that was gained from the structured interviews was written up and analysed in order to make conclusions based on the feedback that the researcher received from the respondents.

However, it is not only warranted to gather data, but to also transform that data into valuable information. There are specific instruments used for this activity and they need to be clearly defined due to the fact that they form the basis for the conclusions reached in the study. The next section will shed clarity on this.

4.3.3 Interpreting the data collected

For the purpose of transforming data into valuable information, Brynard's 6-C Protocol approach to policy implementation was used to assess the process of implementation. To this extent the data was subjected to the rigorous inquiry of the six variables of Brynard's 6-C Protocol.

4.3.4 Data interpretation instrument

Brynard (2005:16-21) proposes his 6-C Protocol, which can be used as a way of understanding and making sense of the complex nature of implementation. This protocol provides a cross-cutting approach to understanding the complexities associated with policy implementation due to the fact that it is informed by practical findings of policy scholars and the South African policy context in particular. The 6-C Protocol model consists of the following variables, namely content, context, capacity, commitment, clients and coalitions, and communication. As mentioned earlier, communication is a variable that Brynard (2005:662) notes as being implied though all the other five variables, although he still refers

to it as the 6-C Protocol. Although we have already clearly defined each variable in Chapter 2, the researcher will give a brief explanation of each variable for the purpose of this chapter.

The **content of policy** refers to the process of interaction between the setting of policy goals and the actions geared to achieving them. Brynard (2000:180) quotes policy implementation scholars, such as Smith (1973); Van Meter and Van Horn (1974); and Hargrove (1975), who suggest that “the content of policy is not only important in the means it employs to achieve its ends, but also its determination of the ends themselves and how it chooses the specific means to reach those ends”. The **context** refers to how the institutional context is shaped by the larger context of social, economic, political and legal realities of the institutional corridor through which implementation must pass. To provide an expansive understanding of implementation, the following three elements related to ‘institutional context’ must be performed within an institution. Firstly, the core institutional actors influencing, or being influenced by the process of implementation must be identified. Secondly, the interest and power relationships within, and between, the relevant institutions must be traced. Lastly, those institutional characteristics, as influenced by the overarching structure of social, economic, political and legal setting in which they function, must be recognised (Najam, 1995:42). **Commitment** to implement refers to how strong the commitment is from those responsible to implementing the policy, and to successfully implementing the policy. Warwick (1982:135) notes that, “effective and efficient bureaucratic structures may be in place trying to implement policy, but without commitment from those role players responsible for implementation, nothing will happen”. **Capacity** to implement looks at what tangible (human, financial, material, technological) and intangible (motivation, commitment, willingness) requirements are needed to achieve policy implementation. Brynard and de Coning (2006:199) note that capacity in the public sector refers to the structural, cultural and functional ability to implement the policy objectives of government. These statements reflect the importance of adequate capacity building within institutions to ensure that they have the means to efficiently and effectively improve implementation. **Clients and coalitions** refer to those stakeholders that actively support a particular implementation process. This variable looks at who the relevant stakeholders are, and how they can have an impact on implementation. And finally, **communication** looks at the specific issues regarding communication that warrant attention.

4.3.5 The reasoning behind choosing the 6-C Protocol as an instrument of assessment

The 6-C Protocol as described by Brynard can be summarised as follows: the variables are based on the idea that implementation as a process is complex in nature both as an administrative, as well as a political, process. Secondly, the variables are widely recognised by various scholars in the field of implementation, as shown in chapter 2. Thirdly, the variables themselves aren't static, but are affected by one another.

As a result of this clarification of the 6-C Protocol, the researcher has the following reasons for choosing the instrument. Firstly, the 6 Cs don't shy away from the complexity of implementation. On the contrary, its variables show the real complex nature of implementation. Secondly, it includes the most critical variables as espoused by a wide range of scholars working within the field of implementation. Lastly, the fact that the variables effect, and are affected by, one another provides the researcher with a useful tool to avoid the difficulties that other researchers might have when choosing a more simplistic approach for interpreting data, which sometimes may result in unreliable conclusions.

4.4 The Ethical Thought Process Behind the Study

The researcher followed due diligence in adhering to the ethical principles as set out by Stellenbosch University. The researcher acquired the pertinent documents required to complete the study from the relevant department. The information that this study yields will only be used for the purpose of completing the thesis and will be provided to the Environmental Resource Management Department.

4.5 Conclusion

The purpose of this chapter was to provide a holistic picture regarding the research design and methodology used by the researcher to undertake the study. The first part looked at how the research design was set up to ensure a critical analysis of the pertinent documentation together with a structured research schedule, where interviews were directed at specific officials whom are familiar and responsible for the implementation of the policy. Ensuing this was the selection of a research instrument to make sense of the yielded data. Lastly, the

chapter looked at a summary of the ethical considerations that the study adheres to. The next chapter will present the findings of the thesis and engage in analysing the data that was yielded through the study.

Chapter 5: Fieldwork Results and Research Findings

5.1 Introduction

The previous chapter outlined the environmental legislative framework for South Africa. It made evident that all three spheres of government have a responsibility to ensure that sustainable development is adhered to, in order to ensure that the environment is protected for both current and future generations. The legal role of local government in ensuring the protection of the environment was specifically mentioned, as it relates to the research topic and goals of this thesis. The IMEP of the City of Cape Town and its implementation has to comply with the statutes and directives mentioned in the previous chapter.

This chapter will now present the following:

- An analysis of the ERMD, which is responsible for the implementation of the IMEP.
- The results of the textual analysis of the IMEP and the IMEP Environmental Agenda Operational Plan for which implementation is being assessed.
- A presentation of the fieldwork results of the application of the 6-C Protocol in order to inform conclusions about the status of the policies' implementation.
- The results of fieldwork interviews and other relevant documentation that relate to the implementation of the policy by the department of ERMD.
- Lastly, some research findings and conclusions will be made regarding the abovementioned points.

5.2 The Environmental Resource Management Department (ERMD) of the City of Cape Town: Implementing Agency

The ERMD is situated in the Economic, Environmental and Spatial Planning Directorate of the COCT and is tasked with the implementation of both the IMEP and its Environmental Agenda. In so doing it ensures that the city's environment is protected and sustainability is utilised for its communities. The ERMD also has a local and global responsibility to ensure that the diverse and unique biodiversity, ecosystems and coastal landscapes, as well as the

exceptional heritage and cultural resources, within the boundaries of Cape Town are conserved.

The Departmental Business Plan (2013/2014) of the ERMD highlights key strategic environmental management programmes to achieve the implementation of the IMEP and its Environmental Agenda, namely:

- Promoting an environmentally sustainable and resource-efficient path for the city's management, growth and development.
- Biodiversity and terrestrial ecosystem management.
- Integrated coastal management.
- Climate change adaptation and resilience.
- An energy efficient and low-carbon city.
- Heritage and landscape conservation programmes.

These key programmes are underpinned and supported by environmental education awareness and skills development; environmental compliance and enforcement; environmental communication; development of sustainable livelihoods; local, national and international partnerships development; environmental fiscal reform; and environmental and heritage information, research and knowledge.

5.2.1 Challenges

The ERMD Departmental Business Plan (2013/2014) shows that there are real challenges to achieving all its service delivery objectives, including:

- Increased urban sprawl, which is affecting environmental degradation, erosion and the depletion of natural resources.
- Social and economic inequalities across communities.
- Climate change and the risks this could hold for infrastructure, the economy and resource security.
- The risk of low energy security as a result of a lack of energy generating capacity by Eskom.

- A high carbon footprint per capita as a result of a dependence on dirty fuel sources.
- Urban migration from rural areas that strains finite natural resources.
- A lack of environmental compliance and environmental awareness.
- A lack of environmental enforcement capability.
- A lack of departmental human and financial resources.
- Meagre city line function integration in planning, development and management, making innovative solutions to environmental problems challenging to implement.
- Budget cuts and a lack of funding for environmental management.
- The challenge of being dependent on other spheres of government and other stakeholders to achieve certain service delivery objectives.

The 6-C Protocol variables (discussed in Chapter 2) that effect implementation are implied in the service delivery objectives of the ERMD and the challenges that it faces with regards to implementing the principles set out in the IMEP. For example, the variable of ‘capacity’ is implied in the challenge related to “a lack of financial and human resources within the department”. If there are insufficient tangible resources (e.g. financial, human, technological) to be allocated, implementation will suffer. A lack of capacity could also affect the content of the policy. For example, standard operating procedure tools, such as monitoring and reporting, could suffer as a result of the lack of capacity needed to implement those operations. The variable ‘content’ is also implied in the challenge associated with “a lack of environmental compliance”, this relates to non-compliance with the regulatory content of policy and not complying with the environmental law's impacts on both the commitment of those implementing the policy and the characteristic of the clients and coalitions supporting or opposing the particular policy.

5.3 The Integrated Metropolitan Environment Policy

The COCT has responded to the requirements set out in national environmental legislation and the Municipal Systems Act (No. 32 of 2000) through developing policies and strategies of its own. The processes followed by the COCT to integrate environmental tools into the planning process provides an example of how environmental assessment tools have been adapted and integrated into the specific institutional processes operating within the COCT.

The IMEP was formally adopted by the COCT on the 31st of October 2001 and contained the vision, environmental policy principles and implementation tools for sustainable development in the city. IMEP is environmentally focused and places sustainable development, the wellbeing of people, and the resources on which they depend, at the top of its agenda. The IMEP provides a vision for environmental targets to be met by 2020, and envisages implementing its policy objectives and targets through various sectorial strategies and plans. The idea was that sectorial strategies would be developed alongside the lines of implementation plans, targets, and actions and programmes to meet the commitments set out in the sectoral approaches. The IMEP identified 15 sectoral approaches that would form the basis for strategy development and implementation by local government (See, Annexure A). From these 15 sectoral approaches, the following detailed sectoral strategies were developed:

- Coastal Zone Management Strategy, 2003
- Biodiversity Strategy, 2003
- Local Biodiversity Strategy and Action Plan (LBSAP), 2009
- Framework for a Strategy and Action Plan for the Management of Invasive Alien Species in the City of Cape Town, 2008
- Public Environmental Awareness, Education and Training Strategy, 2003 and 2011
- Cultural Heritage Strategy, 2005
- Air Quality Management Plan, 2005
- Energy and Climate Change Strategy, 2006

The policy aimed to address environmental challenges that were identified in the State of the Environment Report (SoE), such as air quality, waste management, water resources, transport, urbanisation, housing and energy. Policy is articulated and implemented through various forms and mechanisms, including principles, acts, regulations and policy statements. The environmental policy principles for the COCT were established after consultation sessions with various stakeholder groups across the city. Rossouw and Wiseman (2004:138) noted, in the formulation and implementation of the IMEP, that the COCT recognised that by providing its citizens with the relevant knowledge and information they had provided them with the means of participation in governance. As a result, public participation and capacity building were employed to identify and prioritise the key environmental issues of concern. To this extent, the policy enumerates implementation tools for these policy principles. These

principles will be given affect by analysing them with regards to the 6-C Protocol in Table 5.1.

Table 5.1: 6-C Variable Analysis of IMEP

IMEP Principle	IMEP Implementation Tool	6-C Variable Indicated in Activities
<p>1. Integrating environmental issues into local government decision making at all levels.</p>	<ul style="list-style-type: none"> • Through the adoption of Local Agenda 21 principles in the decision-making process. • Through the Best Practise Environmental Option (BPEO) principle. • Through the integrated development plan (IDP). • Integrated environmental management. • Adherence to new and existing environmental guidelines from all organisations and activities, which impact on the environment in the COCT. 	<ul style="list-style-type: none"> • Content is at stake with the integration of environmental issues into decision-making processes and into standard operating procedures. • Context is implied in the sense that it describes what the institutional corridor of implementation is expected to do.
<p>2. Ensuring resources are used in a sustainable manner.</p>	<ul style="list-style-type: none"> • Through regular environmental monitoring and reporting via environmental monitoring tools. • Through the use of effective environmental management systems (EMS). 	<ul style="list-style-type: none"> • Reporting illustrates accountability of the <u>institutional context</u> with regards to implementation of the policy. It can also be seen as an attempt to prompt commitment from the actors. • Establishing tools to improve efficient and effective resource use will the enhance <u>capacity</u> to achieve implementation goals.
<p>3. Protecting the constitutional right to a healthy environment.</p>	<ul style="list-style-type: none"> • Through enforcement of laws, by-laws, international treaties and strategies. • Through educational programmes. 	<ul style="list-style-type: none"> • Compliance with the laws reflects the regulatory <u>content</u> of the policy and could be seen as effecting <u>commitment</u> to implementation. • Commitment can also be created through educational programmes, which will enhance stakeholder involvement.
<p>4. Developing and implementing detailed sectoral strategies.</p>	<ul style="list-style-type: none"> • Adoption and implementation of the principles of integrated environmental management for all projects and activities. • Ensuring annual reporting on sectoral strategies and implementation of the IMEP. 	<ul style="list-style-type: none"> • <u>Institutional context</u> is reflected in the sense that the institutional channel of implementation takes the social, political and environmental realities into account in its implementation strategy. • Reviewing these sectoral

	<ul style="list-style-type: none"> • 	<p>strategies can enhance <u>capacity and commitment</u> by creating a willingness to implement.</p>
<p>5. Meeting the requirements of international, national and provincial environmental legislation.</p>	<ul style="list-style-type: none"> • Enforcement of laws, by-laws, international treaties and strategies. • Development of new laws and by-laws. • The city's environmental compliance strategy. • 	<ul style="list-style-type: none"> • Shows commitment to adhering to environmental legislative frameworks. • Regulatory content in the form of legislation.
<p>6. Commitment to the involvement of, and partnerships with, civil society in decision-making processes regarding environmental management.</p>	<ul style="list-style-type: none"> • Including communities in the decision-making processes (public participation). • Promoting partnerships between civil society, local government and business to ensure effective environmental governance. 	<ul style="list-style-type: none"> • Clients and coalitions are involved in the interactions with one another, which requires proper <u>communication</u> channels. • The need for networking and partnerships between the various stakeholders points to the relevance of <u>clients and coalitions</u> for effective policy implementation.
<p>7. Commitment by COCT to realising and minimising the impact of its activities on the environment.</p>	<ul style="list-style-type: none"> • The application of environmental risk management. • Developing environmental guidelines for activities, which impact on the City of Cape Town. • The use of environmental management systems. 	<ul style="list-style-type: none"> • <u>Institutional context</u> is reflected by the COCT in understanding it needs to mitigate its own negative effects on the environment. • Creating commitment through adopting environmental guidelines in all activities. • Creating tools to conduct environmental assessments will increase capacity to implement goals.
<p>8. Promoting environmental responsibility within the COCT.</p>	<ul style="list-style-type: none"> • Through environmental educational programmes. • Education and awareness of health and safety, waste and recycling, environmental rights and the resources of COCT. 	<ul style="list-style-type: none"> • There is capacitation involved in that the ordinary citizen is provided with empowering information. • Content is at stake as well, in the sense that there is a direct distribution of power by empowering citizens to know what to expect from state institutions.
<p>9. Recognising the role of disadvantaged communities in the development and enhancement of the city.</p>	<ul style="list-style-type: none"> • Promoting environmental structures in communities. • Supporting community-driven environmental projects. 	<ul style="list-style-type: none"> • Identification of best practises has a lot to do with the role of clients and coalitions in the learning network. • The development of public participation programmes for developmental local government indicates a convergence between the bottom-up and top-down approach of implementation and

		also holds relevance to the <u>context of implementation.</u>
10. A commitment to open, transparent and effective environmental governance.	<ul style="list-style-type: none"> • Through creating communication channels between local government, communities and all stakeholders. • Reporting on environmental issues, programmes and projects. 	<ul style="list-style-type: none"> • <u>Commitment to communicate</u> with stakeholders. • Reporting demonstrating accountability of <u>institutional context.</u> • Engaging <u>clients and coalitions</u> through open and transparent implementation processes.

The above table shows an interesting mixture of the 6-C variables already implied in the various activities prescribed by the policy with regards to each principle of the IMEP. The ‘content’ variable is conveyed in a few of the activities relating to the various principles, whether it is in terms of integrating environmental issues into decision-making processes (i.e. Agenda 21 and IDP) and into standard operating procedures; the redistribution of power by empowering citizens to know what they can expect from state institutions (i.e. through environmental educational programmes and green campaigns); or it is in the regulatory content voiced in those activities that advocate compliance with legislation in the implementation of the policy (i.e. activities relating to the principle of complying with national and international environmental legislation). Second, ‘contextuality’ is implied in those activities that deal with what is expected from the corridor of implementation provided by the different actors in the arena of implementation. Activities such as monitoring and reporting on programmes and strategies illustrates institutional accountability (i.e. institutional context); or the activity of implementing strategies and programmes in a holistic approach, thus taking the social, economic and environmental realities into account in the process of implementation. Third, ‘capacity’ to implement is ensured by, amongst others, those activities that that intend to create willingness to implement (i.e. reviewing of sectoral strategies, providing citizens with empowering information to participate, as well as increasing the structural and cultural ability to implement). Fourth, attempts by the policy to produce ‘commitment’ include adopting environmental guidelines in all city line functions; environmental monitoring and reporting on environmental monitoring tools, and compliance with environmental laws. Fifth, the policy tries to engender useful ‘clients and coalitions’, which demonstrates the activity of engaging with all stakeholders in a open and transparent manner in the policy process and through promoting partnerships between civil society,

business and local government to use efficient and effective environmental governance. Lastly, the policy also attempts to promote ‘communication’ throughout each policy principle and its activities, but more specifically through those activities that create open and transparent communication channels between local government and its communities.

It is important to take note of the fact that the 6-C variables are not mutually exclusive. They are linked and can influence one another in the implementation process. For example, compliance with environmental legislation reflects the regulatory content of the policy, while those actors that implement the policy can also construe it as generating commitment. In the same sense, contextuality is also inferred through the measure of compliance in that it shows the nature and culture of the institutional conduit that is responsible for the implementation of the policy. From this observation it is crucial that the interconnectedness of the six variables be understood, as well as how they can and will shape one another during implementation.

Commitment by the city was shown in the form of a leadership pledge that was signed by 200 councillors and senior management committing local government to strive to uphold the principles of sustainable development in the COCT (Gubic, 2004:45). The Leadership Pledge reads as follows:

“I, the leadership of local government in the COCT, shall ensure that the IMEP is implemented in all activities, plans, programmes and actions undertaken by local government in the performance of its constitutional and other obligations for service delivery and economic development in the COCT. I, commit myself to the promotion of the principles of sustainable development, which aim to meet the needs of today, whilst protecting and enhancing resources for use in the future. I, furthermore commit myself to initiating, supporting and driving strategies, projects and programmes in accordance with which the principles and approaches in the IMEP are implemented and to ensure compliance by all stakeholders and role players. This I do in accordance with the constitution and national environmental policy of South Africa and the rights and responsibilities these place on me as a steward of our resources and promoter of sustainable development.” (Annexure B).

The signing of the ‘Leadership Pledge to IMEP’ indicates a strong commitment to transparency and accountability by each of the councillors who were involved in steering the implementation of the IMEP.

5.4 Five-Year Review of the IMEP from 2003 to 2008

From the abovementioned analysis of the IMEP policy document, it is clear that the policy was a bold and positive step that held a lot of promise for environmental sustainability. It would be driven in an integrated manner that placed the wellbeing of citizens and the natural resources on which they depend at the top of its developmental agenda. When the IMEP document was formulated, the authors of the policy recognised that all successful policy initiatives require that the policy be reviewed and revised on a regular basis so as to ensure that it remains relevant, and to ensure continued improvement in the implementation thereof. Furthermore, it was important to review the policy to identify those aspects of the IMEP that had been deemed as successful in meeting the goals and targets put forward in the 2001 policy document and by the same margin identifying those aspects of the policy that had failed to do so. It is important that the ERMD recognise these reasons for both the success and failure of the IMEP to ensure that the policy becomes more efficient and effective in meeting its objectives in the future.

It is important to make reference to the topic of study here, as this paper does not set out to assess whether or not the targets of the IMEP are being met or not, but rather looks at the implementation process in itself and those variables that affect implementation. Regardless of this, it is an important document as its findings add value to the objectives of the study.

The reviewing process of the IMEP set out to gain an understanding of the internal and external context in which the policy was being implemented. The internal review process had the aim of aligning and guiding the institutional operations and development of the COCT. The review focused on assessing the context and role of sustainable development within the city, as well as gaining an in-depth understanding of the successes and failures of the first five-year environmental policy cycle. Furthermore, the internal review process also focused on the challenges of policy implementation within local government and the institutional activities within the COCT line functions, which endorse or hinder environmental sustainability. At the other end of the spectrum, the external review process was aimed at ensuring that there was relevant alignment, compliance and integration with national and provincial legislative frameworks, policies and strategies.

5.4.1. Summary of the review findings of the IMEP

Cape Town's environmental quality is still under pressure and is continuing to decline as a result of the COCT ensuing a weak model of sustainability that prioritises managing problems as they arise as opposed to managing and addressing the underlying causes of the problems. Secondly, the review found a real lack of commitment by the city and the people of Cape Town to sustainable development. Warwick (1982:135) emphasises the importance of all relevant stakeholders with regards to commitment as he notes that, even when governments have the most logical policy imaginable, they have no chance of succeeding if those who are responsible for carrying it out are unwilling to do so. Furthermore, frequent leadership changes on a political and administrative level from 2001 to 2008 have impacted negatively on environmental initiatives. This, together with siloed organisational structures and poor interorganisational co-operation, is an obstacle to sustainable development. The review also noted a lack of accountability and responsibility across city line functions and a perception that sound environmental management and economic development are mutually exclusive and competitive concepts, rather than cooperative concepts where both can be achieved together. Finally, the review notes that there are inadequate resources, both financial and human in nature, which impacted the progression and success of environmental management between 2001 and 2008.

5.4.2. Analysis against the 6-C Protocol

With regards to the findings of the 2008 review of the IMEP, it is evident that a few of the 6-C Protocol variables were neglected during its implementation timeframe between 2001 and 2008. Firstly, the 'commitment' variable is conveyed in the fact that the review found a lack of accountability and responsibility by the service delivery areas tasked to implement the sectoral strategies. Secondly, the 'institutional context' variable is seen to have an effect on implementation, due to the fact that a political change within the COCT affects commitment to the policy, with many of those councillors that signed the Leadership Pledge of IMEP not being in office anymore. Furthermore, the institutional context is also implied by the fact that the siloed structures within the COCT are impeding intergovernmental cooperation and, as a result of this, also hampering policy implementation. Finally, the variable of 'capacity' is implied by the finding from the review that policy implementation was suffering as a result of inadequate tangible and intangible resources.

5.5 City of Cape Town Environmental Agenda

The City of Cape Town's five-year review of the first IMEP identified the need for the city and all its stakeholders to actively shift from a business-as-usual to a driven and targeted sustainability agenda if it was to mitigate and reverse environmental decline (City of Cape Town, 2009). This led to a revision of the IMEP that resulted in defining key measurable environmental commitments by the City of Cape Town for the next five-year period from 2009 to 2014. The COCT, through the Environmental Agenda, commits to increasing ecosystem and heritage protection while at the same time reducing overall resource consumption within the area. This commitment takes place with recognition that quality environments and resources use patterns that are considerably uneven and aligned with the wealth gap. It is therefore important that resources use targets and strategies that are directed at significantly reducing consumption patterns amongst the middle and upper classes, while increasing necessary resource use in impoverished and disadvantaged communities in order to extend basic services and quality living environments. Within this context, the COCT committed itself to 17 environmental targets over a five-year period, from June 2009 to July 2014. A responsible department with a commitment to proactive support and integration by all relevant line functions would lead the COCT in meeting those targets. The targets of the Environmental Agenda are included in Annexure C. For this study it is important to focus on those targets that fall within the scope of the ERMD, which include the following.

5.5.1. Biodiversity

2009 Baseline: 42.8% of areas that were identified to meet biodiversity targets are under formal management and secured for the future.

2014 Target: Ensure that 60% of areas identified to meet biodiversity targets will be under formal management and secured for future generations. The COCT will increase its investment in those biodiversity areas so as to build their status as key social, economic, educational and recreational assets.

5.5.2. Carbon footprint

2009 Baseline: Current per capita carbon footprint of 6.21 tonnes of CO₂ equivalents.

2014 Target: Ensure that per capita carbon footprint will be reduced to an annual average of 5 tonnes of CO₂ equivalents.

5.5.3. Energy efficiency

2009 Baseline: Electricity usage in 2007 was at 11 874 Gwh.

2014 Target: Ensure that electricity efficiency is improved to reduce electricity consumption in 2014 by 10% from 2007 total electricity consumption figures.

5.5.4. Climate Change Adaption Plan

2009 Baseline: A draft Climate Change Plan of action has been prepared.

2014 Target: Develop and endorse a progressive Climate Change Adaption Plan of Action that remains up to date with recent international information and trends while at the same time promotes community and city resilience to environmental change.

5.5.5. Environmental compliance

2009 Baseline: Baseline indicators were still being developed as part of the draft environmental compliance strategy of the COCT, at the time when the Environmental Agenda was configured.

2014 Target: The city's environmental compliance strategy will be completed and implemented to ensure that the city complies fully with national environmental approval processes for new capital projects.

5.5.6. Environmental education and communication

2009 Baseline: The city currently provides around 30 professional internship opportunities per year, reaches 60 000 schoolchildren through education campaigns annually, and communicate a general environmental awareness message to the citizens of Cape Town on an ad hoc basis.

2014 Target: Recognising that environmental change calls for commitment by all its citizens, and, by the same token, empowerment of people is central to this commitment. The city's environmental awareness, information education and skills development programme will provide 150 internship opportunities over the period of 2009-2014; reach three-hundred thousand school children through education campaigns; and communicate a general environmental awareness message to the citizens of Cape Town at least four times per year, in addition to other focused campaigns.

5.5.7. Cultural heritage

2009 Baseline: Busy digitising and mapping a single citywide heritage resource inventory in terms of the IMEP Cultural Heritage Strategy. The software that is required to roll out this information to the public counters at the district offices is under development, but is not yet accessible to officials or the public.

2014 Target: The target for 2014 is to have an inventory of audited cultural heritage sites and places within the metropolitan area that is easily accessible to the general public (City of Cape Town, 2009:3-8).

It is apparent that The Environmental Agenda sets out strong environmental targets for the ERMD, which demonstrates a citywide commitment to improving environmental governance and sustainable development practises. It is important to note that some of these targets have been already achieved. For example, the city has developed a comprehensive Energy and Climate Change Adaption strategy (City of Cape Town, 2007); Energy and Climate Change Adaption Plan (City of Cape Town, 2010); Cultural Heritage Strategy (City of Cape Town, 2005); Biodiversity Strategy (City of Cape Town, 2003); and the Local Biodiversity Strategy and Action Plan: 2009-2019 (City of Cape Town, 2009). There is also an interesting mix of

the 6-C variables that can be implied in the ERMD Environmental Agenda targets. For example the strong commitment shown by the Environmental Agenda in providing measurable environmental targets to be achieved engenders the variables of content, capacity and commitment.

5.5.8. Analysis against the 6-C Protocol

The variable content is conveyed in the goals of the IMEP Environmental Agenda and the tools that will be used to implement them. For example, the development of an environmental compliance strategy reflects the regulatory content of the policy, as it will comply with national environmental legislation in approving new capital projects. The variable of commitment is implied in those strong measurable targets set out in the Environmental Agenda and through the commitments made to report on the progress of the targets through the mechanisms of an annual State of the Environment Report; an internal environmental performance report; and a mid-term Environmental Agenda Performance Report (January 2012) commenting on the progress that has been made towards the goals of the Agenda (City of Cape Town, 2009). The variable of capacity is also implied in the manner by which the city recognised that these 17 environmental targets could not be achieved without adequate financial investment by the city via directed, driven and organised programmes. The city commits itself to achieving these 17 targets through the development of an environmental sustainability business plan that will act as the financial mechanism for the implementation of the necessary programmes and projects to meet the 17 targets (City of Cape Town, 2009).

5.6 State of the Environment Report

The State of the Environment Report (hereafter referred to as the SoE) for the COCT has been in development since 1998. The SoE is produced biennially. This was intended to be annual, but the resources and time to do so made it not feasible. The 2012 SoE Report (the 2014 report has not been published as of yet) illustrates the alignment between SoE reporting areas, the IMEP Environmental Agenda targets, and the five pillars of the 2012-2017 Integrated Development Plan. Although the SoE does not implement the standard Driver-Pressure-State-Impact-Response (hereafter referred to as DPSIR) framework to help decision

makers in the decision-making process, the direct alignment of their indicators adds value to the city's capacity to monitor and evaluate performance against the targets.

5.6.1 Analysis against the 6-C Protocol

The variables of policy content and capacity to implement are implied in the SoE report. Content is implied in the fact that there are clear indicators as to which performance can be assessed, while the SoE acts as a monitoring and evaluation instrument against which environmental targets can be measured.

Documents such as the Departmental Business Plan, the SoE Report, IMEP and IMEP Environmental Agenda illustrate that the ERMD are making an effort to influence and improve the performance of environmental sustainability. In addition to the documents mentioned above, there are examples of the ERMD initiating collaborations across line functions with regards to addressing sustainability challenges. Such examples include the Mayor's Portfolio of Urban Development Programme, the Climate and Adaption Plan of Action, and the Energy and Climate Change Action Plan, which are administered through an Energy and Climate Change Committee.

5.7 2013 IMEP Review: Phase One Scoping Report

In October 2012, the Economic, Environmental and Spatial Planning Committee initiated and approved the process of reviewing and redrafting the IMEP. Phase one of the review was completed in 2013. The primary aim of phase one of the review and redrafting of the City of Cape Town's Integrated Metropolitan Environmental Policy was to obtain information regarding the perceptions and attitudes to environmental sustainability management and preferences related to environmental policy in order to provide strategic direction and guidelines for the redrafting of the City of Cape Town's Environmental Policy. One of the main findings from the report was a remarkable change in perceptions/attitudes from the 2008 Review with regards to how people saw environmental policy (Laros, 2015). People were becoming much more receptive to the idea of having an environmental policy that sits at a strategic level within the Strategic Planning Unit or within the Mayor's Office. The recommendations from the report can be summarised as follows:

- The COCT needs to adopt a more comprehensive Environmental Sustainability Governance Policy that articulates with a five-year Environmental Sustainability Governance Strategy.
- The Environmental Sustainability Governance Policy will have to commit all service areas, businesses and communities to the protection and sustainable use of its environmental resources.
- The city should develop an environmental strategy that sits at the same level as that of the Social and Economic Growth Strategies of the COCT.
- The development of policy/strategy should be undertaken through a process of engaging each relevant service delivery area by assessing their contribution and support requirements for environmental governance.
- An institutional vehicle should be established, which is directed by the SPU – an environmental sustainability working group.
- The COCT should undertake a capacity needs analysis to assess the appropriate capacity that will be required for implementation of policy and strategy.

(City of Cape Town, 2013: i).

5.7.1 Analysis against the 6-C Protocol

This recommendation from the report speaks to the 6-C Protocol variables, with regards to changing institutional context with transversal working groups on environment and through this process creating capacity and commitment for the policy, as all service areas, business and communities are engaged in the implementation process.

5.8 Strategic City Level Documents Providing Directives for Environmental Management

5.8.1. OneCape 2040

OneCape 2040 was developed by the Western Cape Economic Development Partnership (hereafter referred to as EDP) specifically for the Western Cape government and the COCT and was approved by council on the 31st of October 2012. The purpose of the strategy is to

provide a platform to stimulate a transition towards a more inclusive and resilient economic future for the province (City of Cape Town, 2012:2). OneCape 2040 provides a overarching vision for the province and COCT, which is to bring about a highly skilled, innovative, driven, resource sufficient, connected, high opportunity and collaborative society (City of Cape Town, 2013). Table 5.2 illustrates six key transitions and goals of OneCape 2040.

Table 5.2: OneCape 2040 Transitions and Goals

Transitions	Goals
Knowledge Transition (Educating Cape)	<ul style="list-style-type: none"> • Every person will have access to a good education that will ensure that he/she is appropriately skilled for every opportunity. • The Western Cape will enjoy a global reputation as a location of ecological, creative, scientific and social innovation excellence.
Economic Access Transition (Enterprise Cape)	<ul style="list-style-type: none"> • Any person who wants to economically active is able to secure work. • The Western Cape is recognised internationally as a entrepreneurial destination of choice.
Ecological Transition (Green Cape)	<ul style="list-style-type: none"> • All people have access to water, energy, and waste services that are delivered in a sustainable resource efficient manner. • The Western Cape is recognised as a leader and innovator in the green economy.
Cultural transition (Connecting Cape Town)	<ul style="list-style-type: none"> • The communities that make up Cape Town are confident, welcoming, inclusive and integrated. • Western Cape is recognised as a global meeting point between East and West, and an important connector with the new markets of Africa, Asia and Latin America.
Settlement Transition (Living Cape)	<ul style="list-style-type: none"> • The neighbourhoods and towns of the region provide good quality of life for all, is accessible, has good public services and are rich in opportunities. • The Western Cape is ranked as one of the greatest places to live in the world.
Institutional Transition (Leading Cape)	<ul style="list-style-type: none"> • Ambitious, socially responsible leadership exists at all levels in our society. • The Western Cape is home to many world class institutions in both the public and private sphere.

Source: City of Cape Town, 2013:13

This strategy has led the COCT to develop a City Development Strategy (hereafter referred to as CDS), which sets out to ensure that six key changes transpire within the city, which are directly aligned with six transitions and goals of OneCape 2040, the National Development Plan (hereafter referred to as NDP), and the Integrated Development Plan (hereafter referred to as the IDP). These strategic documents, as well as the economic and social growth strategies and legal mandates, provide a key platform for ensuring sustainable environmental management.

5.8.1.1 Analysis against the 6-C Protocol

OneCape 2040 speaks to the 6-C variables, with regards to content, capacity and commitment. The variable of content is implied in the distributive nature of the strategy to develop general welfare in society through its 6 transitions and associated goals. Capacity is implied in the creation of the knowledge, economic access and ecological transition of the strategy to ensure sustainable future development. And finally, commitment is implied in the fact that OneCape provides a vision and goals for the future of the Western Cape and subsequently it has created commitment from the COCT through the development of the CDS.

5.8.2. The City Development Strategy (CDS)

The CDS is an action plan for improving the prospects and quality of life for the residents of Cape Town and its surrounding area in the long term. The CDS sets out defining, differentiating, enabling and foundational goals and support tools. Table 4.2 sets out the six CDS goals and shows their alignment with that of OneCape 2040 and the IDP.

Table 5.3: CDS Goals and their Alignment to IDP (2012-2017) and OneCape 2040

Goal Type	City CDS Goals	Alignment with IDP 2012-2017	Alignment with OneCape 2040
Foundational The basics that need to be achieved in order for the city to function.	1. Lead a healthy and vibrant life 2. Be educated	<ul style="list-style-type: none"> • Caring City • Inclusive City 	<ul style="list-style-type: none"> • Living Cape • Educated Cape
Enabling Support the delivery of the foundational goals.	3. Be an inclusive and resilient city 4. Be connected and informed	<ul style="list-style-type: none"> • Opportunity City • Inclusive City 	<ul style="list-style-type: none"> • Enterprising Cape • Connecting Cape
Defining and Differentiating Set Cape Town apart from other cities and regions, and give the edge that is required to take the city to 2040.	5. Build and celebrate Cape Town spirit 6. Inspire an eco-friendly city region	<ul style="list-style-type: none"> • Safe City • Caring City • Opportunity City 	<ul style="list-style-type: none"> • Connecting Cape • Green Cape
Support Tools	7. Optimum basic service delivery 8. Engaging service delivery 9. Responsible citizenry 10. Innovative financial mechanisms	<ul style="list-style-type: none"> • Well run City 	<ul style="list-style-type: none"> • Leading Cape

Source: City of Cape Town, 2013:14

The defining and differentiating goals aim to set Cape Town apart from other cities in Africa and around the world and to give it the edge that it needs to achieve the goals of 2040. Furthermore, environmental sustainability is implied in all the goals, but it speaks specifically more to the CDS goal of ‘inspiring an eco-friendly city region’. This goal again intends to position the city by capitalising on its wealth of environmental assets and its potential for driving alternative resourcing development approaches.

5.8.2.1 Analysis against the 6-C Protocol

It is evident from the CDS that some of the 6-C variables such as content, context, commitment and communication are implied in the document. For example, content and context is implied in relation to the fact that the strategy has foundational, enabling and defining goals to it with a specific set of support tools to be used to achieve these goals which are aligned to with OneCape 2040 and the IDP. Furthermore, as a result of this alignment the variables of commitment and communication are implied, due to the fact that these strategic documents speak to each other’s goals and reaffirm their commitment to ensure sustainable development.

5.8.3. The Integrated Development Plan (2012-2017)

The IDP for the COCT represents the strategic vehicle through which the city will achieve its vision of constructing the five pillars of a caring city; an opportunity city; a safe city; an inclusive city; and a well-run city.

Each of these five pillars has strategic delivery objectives within which environmental sustainability is a key strategic performance delivery area. For example, the ‘opportunity city’ has a strategic objective to promote sustainable development through programmes that ensure efficient utilisation of resources, such as the development of a green economy and the expanded public works programme. The ‘caring city’ pillar programmes include environmental health and air quality management, whereas the programmes associated with the ‘inclusive city’ include heritage management. This, together with the IMEP, the Environmental Agenda and the SoE illustrates that there is a certain level of integration for environmental sustainability objectives into administrative and service areas.

5.8.3.1 Analysis against the 6-C Protocol

A curious mix of the 6-C variables can be implied with relation to the IDP. All six of the variables can be applied to this document. It is distributive in nature (content), it is formulated with the inputs of various stakeholders (clients and coalitions) and it takes into account the institutional context of the city and creates a commitment from all stakeholders to ensure that the goals as set out in the IDP for a 5-year period are actively driven.

5.8.4. Cape Town Spatial Development Framework (CTSDF)

The Cape Town Spatial Development Framework (hereafter referred to as CTSDF) was approved by the COCT council committee on the 28th of May 2012. The overarching purpose of the CTSDF is to ensure that Cape Town has a more sustainable and equitable development path. The CTSDF identifies three key strategies that will drive sustainability in the city:

- Planning for employment and improving access to economic opportunities.
- Managing urban growth and creating a balance between urban development and environmental protection.
- Building an inclusive, integrated and vibrant city.

5.8.4.1 Analysis against the 6-C Protocol

There are two key variables from the 6 –C Protocol which are implied within the CTSDF. The variables of content and commitment are implied in its key strategies with regards to being a regulatory and distributive strategy which creates a commitment from the city to move towards more sustainable development practises.

These key strategies have set sub-strategies and policies informing each key strategy which can be found in Annexure B.

Following the document analyses, the study will now turn to key interviews which were conducted with officials from the ERMD to gain more insight into the implementation processes of environmental policy in the COCT.

5.9 Fieldwork Results on the 6-C Protocol

5.9.1. Methodological notes

All of the six interviews conducted were based on a formal semi-structured research schedule process that was tape recorded with the officials of the ERMD responsible for implementing IMEP and its Environmental Agenda (Manager of Environmental Compliance; Manager of Environmental Corporate Governance; Manager of Biodiversity; Head of Environmental Policy and Planning; Consultant; State of The Environment and Sustainability Coordinator). The semi-structured research schedule included a total of 27 questions, which were grouped under the 5 “C”s as subsections with respect to Policy as Content; Institutional Context; Commitment to Implement; Capacity to Implement; Clients and Coalitions; and Communication (Annexure D). Each subsection also had a rating scale by which interviewees were asked to state whether they felt that each “C” in the implementation of the policy was very good; good; bad or very bad, and asked to comment on why they gave that rating. The data extracted from the research schedule was supplemented by information acquired from reports prepared by consultants on the implementation of IMEP.

In summary, this section of the chapter looks at the data yielded through the research schedule while analysing the data through the use of the 6-C Protocol as the tool of analyses, as indicated in the research methodology and literature review of this study. The reasoning for this is to ensure that data gained from fieldwork is turned into information, which will be used to answer the research question.

5.9.2. The “Content of Policy” and the extent of its implementation

There were five questions directed to respondents with regards to policy as ‘content’. The first two questions were very factual in nature and looked at whether or not respondents were familiar with the objectives of IMEP and the tools/instruments that were used to achieve these objectives. Although, as expected, all of the respondents couldn’t name the exact objectives as set out in IMEP, they gave a clear indication of the overarching objective to essentially integrate environmental sustainability into the way the city functions, ensuring that all departments include environmental principles and policies in their strategies, functions and decision-making processes. 33% of respondents made reference to it as an umbrella type of policy from which various sectoral strategies were developed as the initial

tools to ensure its implementation (see Annexure A). The Head of Environmental Policy and Planning made reference to the fact that, when they review IMEP, they also have to review all of the sectoral strategies so as to assess which ones still fall under IMEP, as some strategies have been mainstreamed in core line functions, such as the biodiversity strategy which sits within the biodiversity management branch. Therefore, assessing what are the sectors that require detailed sectoral strategies under a new environmental policy. 33% of respondents made reference to the sectoral strategies as being the only tools for achieving policy objectives, whereas 67% of the respondents pointed to the fact that there were more detailed tools (such as EIAs and SoE), with one respondent noting that some of these tools were used more than others. For example, the same respondent said that EIAs are used regularly but there is a question regarding whether tools such as these are used effectively to drive the objectives. The question then becomes to what extent environmental sustainability is incorporated into these tools and to what extent they are being implemented. 50% of respondents noted that there is a small section for IMEP in council reports that ask if there are any sustainability implications for the city. They emphasised the point that, if ticked yes, there is no one that follows up if this is truly the case. There is in essence no tracking of these conditions. The fourth and fifth questions addressed how they viewed the content of the policy statements and guidelines of the policy; and what the role of the ERMD was with respect to the implementation of IMEP. 67% of the respondents were of the opinion that the original policy principles of IMEP were good at the time of their formulation and implementation but after over 14 years without being revised and updated, most of these principles have become out-dated. The other 33% of the respondents felt that the policy principles were too idealistic, ambitious and vague without a clear implementation plan. One of the respondents emphasised this point as follows:

“As principles goes they are idealistic in that it sets out to achieve a lot, but they were very vague on how it would be achieved, there should have been more detail surrounding the implementation plan.”

100% of the respondents were clear on the role of the department with respect to implementation. The department's role is to be a coordinator in terms of implementation of IMEP, but actual implementation of the sectoral strategies sits with the line functions. It was noted that 33% of respondents weren't sure whether there was a transversal working group in place keeping track with IMEP in ensuring the sectoral strategies driven by line functions were ever fed back into IMEP. 67% of the respondents noted that there was no such

transversal reporting platform in place. The last question under ‘policy as content’ asks, how they would rate the ‘Content of Policy’. The overall response to this question was that the content was groundbreaking for its time in the sense that, together with Durban’s Environmental Policy, it was one of the first environmental policies at a local government level. However, the policy is no longer really relevant, and 100% of the respondents rated it as bad. There was a difference in opinion regarding the layout of IMEP having the ‘Hub and Spokes’ approach with detailed sectoral strategies under an umbrella policy, as is the case with IMEP, where 67% of the respondents said that a revised environmental policy should be formulated around the same approach, while 33% of the respondents felt that a more cross-cutting approach for the policy was needed, that articulated into an Environmental Strategy with specific set out targets.

5.9.3. Institutional context in the implementation process

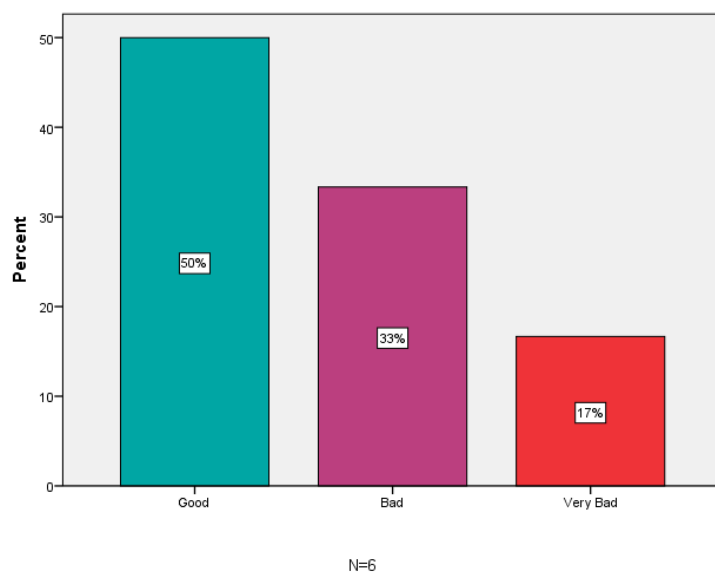
When extracting data on the role that the institutional context plays in the implementation of policy, the researcher posed four questions to the respondents. The first question asks how IMEP is aligned with the national and provincial environmental policy, legislation, strategy and plans. 100% of the respondents were clear that IMEP is not aligned to national and provincial environmental management policy/strategies and plans, due to the fact that IMEP hasn’t been updated since 2001 and, even at the time of IMEP’s formulation, there wasn’t any real framework for environmental policy in place. 33% of the respondents made reference to the fact that, on a legislative front, the IMEP is aligned with the principles as set out in NEMA. One respondent emphasised that the IMEP has to be updated to be in line with strategic documents such as the NDP, National Strategy for Sustainable Development, Green Economy National Strategy, and Climate Change National Policy. The second question looks at the key issues that need to be addressed at an institutional level to ensure successful policy implementation in the future. There was a range of responses with regards to this question, ranging from engaging decision makers to understand the complexities of the natural environment, providing them with the technical knowledge, and raising awareness and capacity building around environmental issues. However, the most important issue was that the policy wasn’t seeded at a strategic level. 100% of the respondents said that a revised environmental management policy should sit at the same strategic level as that of the Economic- and Social Growth Strategies which are situated within the mayor’s office and

have a strategic policy unit (hereafter referred to as SPU) that deals directly with environmental aspects at the same level as that of economic and social aspects. One of the respondents emphasised this point as follows:

“Environmental policy should sit in the Mayor’s office with the SPU, and if necessary people need to be moved into that unit to ensure that your social, economic and environment sit together at the same level, this will in effect provide a lot more weight and commitment to the policy, as this is where policy is happening.”

The last question under ‘institutional context’ asks correspondents to rate the ‘Context of Policy’. See Figure 5.1:

Figure 5.1: How do you Rate the “Context” of the Policy



50% of respondents said that the institutional context of the IMEP at the time was good but, as with the ‘content’ of policy, it is also out of date. On the other end, 33% of respondents felt the institutional context of the IMEP was bad, while 17% felt that it was very bad.

5.9.4. Commitment to implementing policy

This section looks at how strong or weak the commitment is from those responsible for implementing the policy. The research posed three questions to interviewees. The first question was: how strong is the leadership commitment and support for the implementation of the IMEP and its Environmental Agenda? Before looking at the respondents' comments, it is important to again make reference to the Leadership Pledge that was signed when all the councillors formulated the IMEP, showing the political commitment to the policy. 67% of respondents said that in theory there is commitment to environmental types of policies by senior managers and politicians, but when it comes to the reality of implementing the IMEP, commitment has fallen to the side. 33% of this 67% said that the reason for this was that when decisions had to be made between development and environment, development initiatives always takes preference over the environmental issues. One respondent noted that this was understandable given all the social and economic inequalities faced by local government. A quote from one of the respondents sums this up as follows:

"I think there is fairly good commitment for environmental types of policies, but that it is hard to implement due to the fact that decision makers come across various challenges where you need to way up between development and environment, whether there is specific commitment to IMEP, probably not, but in general there is good support for sustainable environmental governance."

On the other hand, 33% of the respondents felt that there was no senior level or political commitment within the city for implementing the IMEP, with one respondent stating:

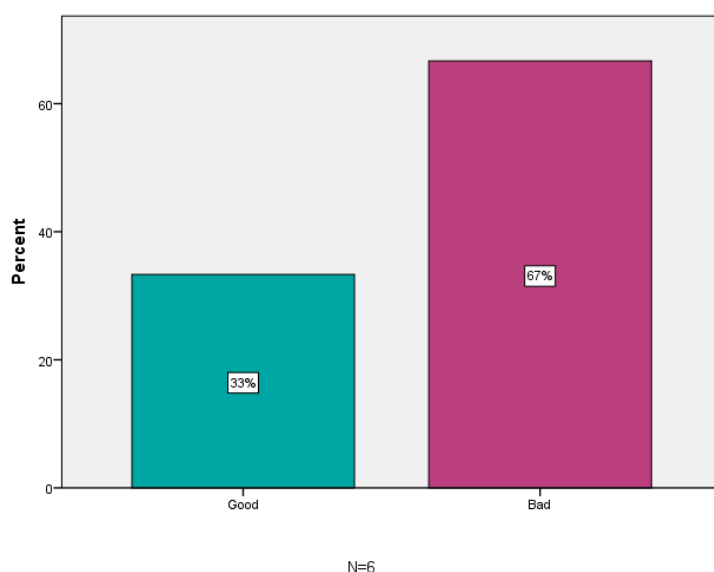
"I don't think there is any commitment to implement, I really don't, and I don't think people are concerned with the environment."

The second question asks what needs to be done to improve staff commitment to the implementation of the IMEP. There were a few main responses that came out of this question. Firstly, the creation of awareness of the importance of the environment (environmental education) to help people to understand how environmental policy assists the creation of a better city. Secondly, creating environmental transversal working groups between the ERMD and other departments, who could work together more specifically with other departments, engaging with them on environmental policy and asking how the ERMD

can help the line functions responsible for implementation. Thirdly, respondents noted that staff commitment would also increase when environmental policy sits at the same strategic level as that of economic and social policy.

The last question, under ‘commitment’ asks how respondents rate the ‘Commitment of Policy’. See Figure 5.2:

Figure 5.2: How do you rate the “Commitment” of the Policy



67% of respondents felt that the commitment to implementing the IMEP was bad, while 33% felt that it was good, but could be improved with some of the initiatives mentioned above.

5.9.5. Capacity to implement policy

This section of the research schedule looks to identify the tangible (human, financial, material, technological, etc.) and intangible (leadership, motivation, willingness and other intangible attributes) required to achieve successful policy implementation. The researcher posed four questions to the respondents. The first question was with relation to the monitoring and evaluation of the policy and whether there are sufficient resources in place to do so. 100% of the respondents said that there is no M&E system in place to monitor the IMEP. One of the respondents made the following comment:

“There is no M&E system in place for IMEP, except for the council report which doesn’t function as an efficient oversight mechanism, a M&E system has to be developed which can also be tracked onto someone’s job, such as that of the SoE, but if you develop it smart enough then the resources needed to put together that information should be to enormous.”

As mentioned in the ‘content of policy’, respondents noted that, for council reports, there is a section to list whether this action has any constitutional implications, legal implications, staff implications, and a small section at the end that asks whether the contents of the report are in line with the IMEP and if there are any environmental consequences as a result. Despite this, no one follows up, so it comes down to the committee to decide whether or not they would like to follow up. The researcher asked whether the State of the Environment Report was used as a tool for monitoring the IMEP, but the responses reflected that the SoE reported more on the broader environmental goals, while not specific to the IMEP and the Environmental Agenda targets. The following two questions directed to respondents under this section are around whether there is sufficient use of information communication technology (hereafter referred to as ICT) in place to support implementation and the capacity constraints affecting implementation. 33% of respondents said that there was more than enough ICT in place, with things like spatial GIS technology and the biodiversity network being utilised. While, on the other hand, 67% of respondents felt that, although there was some ICT in place like GIS, it isn’t being used efficiently enough to add value to the implementation process. Furthermore, with regards to questions regarding capacity constraints to implementation, a host of different factors arose, including budget and staff constraints, a lack of technical environmental knowledge as a result of weak consultation, and time to do alternative costing and comparisons on how to best implement.

The last question under ‘capacity’ asks, how respondents would rate the ‘Capacity of Policy’. 100% of respondents were of the opinion that capacity in implementation of the IMEP has been very bad, mainly due to the fact that there has been no M&E system in place.

5.9.6. The role of clients and coalitions

Implementation scholars have come to realise that the effectiveness of any policy implementation process depends equally on those target groups to whom policy is delivered. Therefore, the researcher posed five questions to the respondents of the ERMD. The first question looked to extract data around identifying the key partners in implementing the IMEP. 100% of respondents noted that for the IMEP itself there aren't any key partners but that there are rather key partners around the sectoral strategies. For example, environmental education has key partners in NGOs and schools, whereas with the energy strategy, for example, has links with business organisations, tertiary institutions, and the construction sector. Biodiversity also works very closely with CAPE, Cape Nature, WESSO and Sun Parks. All respondents noted the importance of having partnerships with civil society, but were of the notion that there weren't any real links of this nature. The second question tried to assess whether there are any institutional arrangements in place that foster intergovernmental co-operation as well as build relationships with civil society to improve policy implementation in the COCT. 83% of respondents noted that intergovernmental co-operation in the city transpires informally and occurs more on a sectoral basis. For example, when the ERMD engages with the provincial and national government it is on issues such as climate change and coastal management. Thus, engagement with provincial and national government is more on an ad hoc basis rather than as an environmental working group between all three spheres. 17% of respondents said that due to the siloed structure of the city and the lack of environmental transversal working groups, co-operation between departments is difficult, as everyone looks to protect their limited resources.

The next question asked what the role of government, private sector and civil society should be in ensuring the successful implementation of environmental objectives. With regards to the role of government, respondents noted the government plays a key role around legislation, regulation, policy, governance, communication, and the monitoring and evaluation of those environmental objectives. The role of the private sector was identified as also contributing to the implementation of environmental goals, but they are consulted on what government expects them to do, so that it is made clear to the sector what and why they should play a role in ensuring sustainable environmental development. While the role of civil society is to be a partner in the formulation and implementation of environmental aspects, if everyone makes more sustainable choices then remarkable improvements would be seen in the environment. The following quote from one of the respondents illustrates this:

“The role of government is setting legislation and policy, as well as implementing projects that are not really the responsibility of the private sector. Government should protect the common good for areas that don't have a market and have a responsibility of enforcing the law. On the other hand, historically and to this day, civil society is generally more concerned with the social issues than environmental issues. As a result civil society has a great role to play with regards to implementation and the city tries to promote it via environmental education campaigns and communication channels”

Two of the respondents noted that there is a gap between environmental policy and civil society engagement, and a formal strategy is lacking. The fourth question asked the respondents what, in their opinion, are the perceptions of the stakeholders regarding the quality and value of the IMEP and its Environmental Agenda. 100% of the respondents had the same outlook, stating that those familiar with the IMEP felt that it had value, but is out of date. The Environmental Agenda targets exist as a result of the fact that the IMEP wasn't specific enough – the targets provided a measurable platform, more feasible than the vague and broad policy objectives of the IMEP.

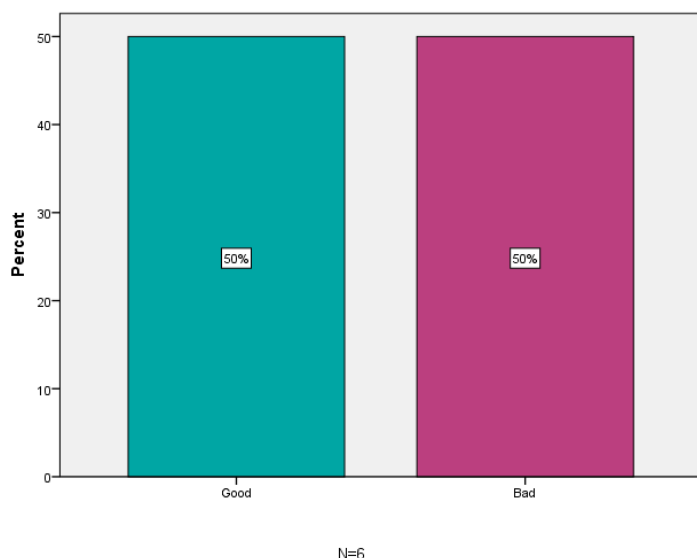
The last question under 'clients and coalitions' asks how respondents would rate the 'clients and coalitions of policy'. 100% of respondents rated it as being bad with regards to the IMEP itself, while 50% of those added that, at the time of its implementation, it could have been seen as good.

5.9.7. Communication around the implementation of policy

With regards to this section, the researcher posed three questions to the respondents. The first two questions aimed to extract data around whether there was a communication strategy in place to support the IMEP and what, in their opinion, were the specific communication issues that warranted further attention. 100% of the respondents said that there is no official communication strategy around the IMEP, but rather that there is a communication strategy around general environmental sustainability within the city, which is communicated through items like the environmental newsletter that goes out every month and the website, which is currently being updated and will look to improve the digital communication. The last

question, under ‘communication’, asks how respondents would rate the ‘communication of policy’, see Figure 5.3:

Figure 5.3: How do you rate the “Communication” of the Policy



50% of respondents rated communication as being good, because there are communications channels in place between departments. On the other hand, 50% of the respondents said that it was bad, because of the fact there was no communication strategy in place to support the overarching environmental policy known as the IMEP.

5.10 Research Findings

This section looks to turn the data collected from the interviews into information relevant to this study. The research findings will be presented under the 6-C Protocol in the same manner that it was used to extract the data from the field.

5.10.1. Content of policy

With regards to policy as ‘content’, the question asked by the researcher regards what role policy as ‘content’ has on the implementation of the IMEP within the ERMD. Brynard

(2000:180) quotes policy implementation scholars such as Smith (1973); Van Meter and Van Horn(1974), who suggest that “the content of policy is not only important in the means it employs to achieve its ends, but also its determination of the ends themselves and how it chooses the specific means to reach those ends”. It is clear from the data extracted under this section that the IMEP has good environmental principles and objectives, some of which are still relevant, but most of which are out-dated, due to the fact the policy has been around since 2001, and has never been revised in that time, whereas provincial and national environmental sustainability policies and strategies have come on in leaps and bounds since then. The tools used to achieve the objectives of the IMEP have also not been as effective as envisaged, and no clear tracking of the tools in a transversal reporting structure to ERMD has impacted implementation. If the objectives don’t talk to the tools used to achieve those objectives and vice versa, then implementation will suffer.

5.10.2. Context of policy

O’Toole (1984:202) notes that the “field of policy implementation has yet to address as part of its research strategy, the challenge of contextuality, beyond fairly empty injunctions for policy maker, implementers and researchers to pay attention to social, economic, political and legal setting”. It is clear from the respondents that there has been a big shift in the political and administrative sphere with regards to how people view environmental sustainability. However, there is still not enough buy-in from decision makers with regards to sustainable environmental management issues, as there might be with economic and environmental issues, for example. The fact that the IMEP has not been updated with regards to national and provincial policy and legislation has meant that there isn’t a real foothold for the IMEP when it comes to including environmental issues in the decision-making process, as it doesn’t speak to any of these abovementioned policies. Furthermore, as mentioned in the previous section of “policy as content”, the fact that the IMEP isn’t positioned within the strategic policy unit in the Mayor’s Office provides it with a weak political commitment, which has affected its implementation. Environmental sustainability should not be seen as impeding economic and social development, but rather as ensuring future sustainability for all three pillars if environmental capital is used more efficiently and effectively. The lack of technical environmental knowledge and awareness on why environmental sustainability policy/strategy is important also has dire implications for implementation. Low levels of comprehension

regarding why those responsible for implementation should implement policy affects the process in itself.

5.10.3. Commitment of policy

Brynard (2005:660) notes that commitment is important at all levels of the implementation process and not just at ‘street level’. From the respondents it is clear that a lack of political and senior level commitment to the IMEP has hampered implementation. A lack of integration between the different departments and the IMEP as a result of siloed structures is also a reason for weak staff commitment with respect to implementation in the different line functions. Although there has been relatively good work done with regards to environmental education using the smart living handbook and the 110% green campaign, more can still be done. The fact that the environmental policy doesn’t sit at the same level of the other strategic policies, such as economic and social, has also had an effect on staff commitment and thus on implementation. Staff will get behind the policy if it sits at the strategic level. This point also speaks to the institutional context of the policy because, if the policy sits at a higher institutional level, it will affect political commitment as well as that of the administration. This relates the notion made by Lipsky (1980) that commitment is much more influenced by institutional context and clients and coalitions, although Brynard (2005:660) notes that commitment will influence and, in turn, be influence by the remaining five variables of content, institutional context, capacity, clients and coalitions, and communication.

5.10.4. Capacity of policy

Brynard and de Coning (2006:199) note that capacity in the public sector refers to structural, functional, cultural and functional ability to implement policy objectives. With reference to the IMEP, the resources required to achieve implementation were examined. It was clear from the interviews that the IMEP was lacking an effective M&E system, which has affected policy implementation. Without clear M&E indicators in place to track policy objectives or targets, policy will suffer. Other concerns related to resource constraints have to do with the fact that there are limited funding and staff shortages, which impact on productivity. Time and staff shortages result in a situation whereby departments and line functions don’t have the necessary resources to step away and figure out how to do things in a different way, and then

step back in again, thus the resources need alternative costing and strategies to ensure successful policy implementation.

5.10.5. Clients and coalitions of policy

Warwick (1982:176) notes that the transactions most vital to implementation are those between the programmes and the clients. There is a clear gap with regards to the IMEP and the engagement of its stakeholders to implement the policy. When the IMEP was formulated it underwent a process of public participation, but there was never a formal strategy in place to ensure that all stakeholders are actively engaged with the process. Although there were ad hoc partnerships on some sectoral approaches, it would have more value to the environmental objectives and targets if there were partnerships with government (national and provincial), private sector and civil society. The COCT and the Western Cape government (hereafter referred to as WCG) have changed their slogans to a more new public management type of thinking. Whereas the COCT slogan was “The City That Works For You”, it is now “Making Progress possible together”. The WCGs slogan has changed from a “Home for All” to “Better Together”. This shows that the city and province know that they can’t improve economic, social and environmental development without the engagement of ‘clients and coalitions’. Thus, the IMEP or any other new environmental policy should actively and continually engage with all stakeholders and ensure that roles and responsibilities are clearly defined. Furthermore, the lack of environmental transversal working groups with internal as well as external partners (as was mentioned earlier within some of the previous sections) has had a negative effect on implementation. There are transversal working groups with regards to the Climate Change Committee and the Portfolio Committee, but a Committee on Sustainable Environmental Management issues is sorely missed. The stakeholders need to firstly know what they have to do, why they have to do it, and by when it should be done. It should not be forced; stakeholders must rather be made to understand that there is a role for everyone to play in order to ensure that we have sustainable economic, social and environmental growth.

5.10.6. Communication of policy

‘Communication’ in the implementation of policy is of the utmost importance. Brynard (2005:21) identifies communication as making up the sixth “C” even though it was always

implied in all five variables. It is important to look at it as variable in itself that effects and which is, in turn, affected by the other five variables as discussed in Chapter two. This point is especially significant when policy is implemented in a country with a rich cultural heritage and eleven official languages. The fact that the IMEP didn't have a communication strategy through which it could communicate its objectives, its tools, and the stakeholders responsible for its implementation, monitoring and evaluation has proven to be detrimental to the successful implementation of the environmental policy. The policy should be communicated so that it is not forgotten over time. The fact that the digital communication platforms, such as the website, are being upgraded is a positive sign but other social media platforms should also be used to raise awareness around policy and, specifically in this case, the environmental policy of the city.

5.11 Conclusion

The evaluation of the implementation process of the Integrated Metropolitan Environmental Policy (IMEP) provided important information. The evaluation commenced with the critical analysis of policy documents and reports, and followed with the presentation of data captured by the researcher through conducting fieldwork interviews with officials within the ERMD, responsible for coordinating and monitoring the implementation of the IMEP and its environmental agenda. The evaluation of the implementation process of the IMEP by the 6-C Protocol variables indicates that there is a weak culture of consultation within the city service delivery areas with regards to the IMEP and the Environmental Agenda targets. There is also a lack of monitoring and evaluation tools and indicators in place in order to report, review and redraft environmental programmes, strategies and policy. Inevitably, the critical analysis of the data yielded using the 6-C Protocol variables shows that there are certain challenges facing the ERMD in coordinating the implementation of the IMEP. The following chapter presents a summary of the findings and recommendations.

Chapter 6: Conclusion and Recommendations

6.1 Introduction

In the preceding chapter, the data yielded by the textual analysis of the IMEP and policy documents relating to the IMEP indicated that the IMEP had very vague and broad goals with specific policy principles and related tools/instruments with which the policy is implemented. On the other hand, the interviews conducted through the research schedule indicate that, although the IMEP was a good policy for its time, the implementation of the IMEP had been stunted over the years by a wide variety of factors, including out-dated policy objectives and tools used to implement those objectives. This is as a result of the policy never having been updated, although it has been revised on two occasions and is finally in the incipient stage of being revised and updated. Weak political and administrative commitment to the IMEP, as a result of its low strategic positioning and resource constraints, has also impacted on the implementation process. There is a significant challenge with regards to monitoring and evaluating the implementation of the IMEP, which has rendered the impact made by the policy hard to measure.

The specified goal of this thesis is the assessment of the implementation process of the IMEP by means of the 6-C Protocol model. Notwithstanding the incipient development of a new environmental policy, the conclusion can be made that the implementation of the IMEP was relatively poor, and this can be accredited to the following:

- The fact that the IMEP has not been updated since its inception has made the policy out-dated.
- The institutional context with regards to the positioning of the policy has not provided it with the necessary strategic direction and leadership for its implementation, which has affected commitment to implement.
- The lack of transversal environmental working groups between service delivery areas and the ERMD gives rise to a failure in creating proper alignments, establishing relevant partnerships and engaging staff in matters of implementation.
- The non-existent communication strategy between the critical groups of clients and coalitions.
- The lack of an effective M&E system in place to track and report on the implementation of the policy.

Due to this, measures must be taken to accelerate the emerging development of a new environmental management policy for the COCT. The following recommendations are made.

6.2 Recommendations

The following recommendations are made in order to improve the implementation of the IMEP or rather to formulate a new environmental policy for the COCT.

6.2.1. Recommendation 1: The development of new tools to implement policy principles and objectives

It was concluded that out-dated policy objectives and ineffective use of policy implementation tools have been reasons for poor implementation. It is therefore recommended that new implementation tools be developed within a new revised environmental policy, which will in effect improve the efficiency of implementation. Tools, such as the EIA and the SOE, provide a wonderful foundation when applied in the correct manner, but further tools in the form of by-laws and urban overlay zoning can add value to the implementation process. With regards to ecological infrastructure, for example, spatial overlays can be used to provide information regarding where the resources and space are available in order to use the natural environment to provide natural infrastructure services. On the other hand, by-laws can be developed to act as a regulatory tool to ensure environmental compliance. These by-laws will have to be developed with careful consideration to make sure that they do not overlap with other city functions and by-laws. The use of environmental by-laws will ensure that environmental policy in essence is regulatory, distributive and redistributive in its 'content'.

6.2.2. Recommendation 2: Aligning environmental policy with national, provincial and city strategic directives for environmental management

It is recommended that policy objectives/principles should ideally be updated on a five-year basis to ensure that they are in line with current environmental strategic directives of national,

provincial and local policy documents. These include the National Development Plan (NDP), National Strategy for Sustainable Development, Green Economy Strategy, Climate Change Policy, OneCape 2040, City Development Strategy (CDS), Integrated Development Plan (IDP), Cape Town Spatial Development Framework (CTSDF), Social Development Growth Strategy, and the Economic Growth Strategy. Updating local environmental policy in an arena where the ‘context’ and ‘content’ of national and provincial related policy is ever-changing, it is important to ensure that policy does not become out-dated and redundant.

6.2.3. Recommendation 3: Closer engagement with partners inside and outside the organisation

It is recommended that an institutional grouping in the form of an environmental transversal working group within the COCT needs to be established, where crosscutting environmental issues can be discussed between the ERMD and the various service delivery areas. Sustainable environmental management is not just the responsibility of the ERMD, but every line function within the COCT. Therefore, this grouping can be used to discuss environmental responsibilities and also provides a stage from which responsibilities can also then be tracked. It isn't enough to only provide an implementation framework to line functions and expect them to implement it, this way of thinking reflects a top-down approach and what is actually required is a mix between a ‘top-down’ and ‘bottom-up’ approach. Furthermore, there needs to be detailed implementation guidelines, which should be developed via the process of the ERMD and the different line functions working together to formulate targets. The ERMD should work closely with these service areas to support them on a technical level.

Secondly, the New Public Management model envisages public private partnerships (hereafter referred to as PPP) being formed to ensure both effectiveness and efficiency of governance. The fact that the IMEP didn't really engage with stakeholders will have to be rectified with the new policy. Consultation with the various stakeholders is very important, as buy-in from all stakeholders is required to effectively and efficiently implement policy but this is unlikely if the various clients and coalitions feel that they have not been consulted. Therefore, building a relationship/partnership between government, business and civil society is important due to the fact that sustainable environmental governance is the responsibility of all three. Engagement should come from both a ‘people-centred’ and ‘eco-centred’ approach.

On the one side, for example, are the environmental purists who need to understand that social and economic development within the urban context is important for sustainability. On the other hand, those that agree with the people-centred approach need to be helped to understand how the natural environment and its resources underpin our economy and development, especially in the case of Cape Town, which is a tourist and service industry leader. This does not mean that the economy and its resources are subservient to the environment, but rather that they need to understand the constraints that the natural environment can have on society and the economy. In summary, there should be an environmental transversal working group within the COCT and there should be continuous engagement with all stakeholders in the formulation and implementation of a new environmental policy.

6.2.4. Recommendation 4: Developing an appropriate M&E oversight system

One of the critical issues concluded from the research was that there are no clear monitoring and evaluation tools in place to support the implementation of the IMEP. The researcher was originally of the view that the SOE acted as a monitoring tool for the IMEP, but it became clear from the interviews that the function of the SOE is to provide a general view of the cities' environment in a given point and time, a general snapshot from year to year. It is an M&E tool, but isn't specifically a tool for the IMEP, it therefore produces a general view of the city with respect to environmental sustainability and also ensures that the city is transparent with the state of environment to the general public. It is recommended that the development of an M&E system that functions within the new policy be of key importance for the success of the policy. It is also important to assess at which level the system will sit. It can be attached to an official job within the ERMD, for example, as is the case with the SOE. There can also be a unit beyond the ERMD that tracks the implementation of the policy as currently, with regards to the IMEP, not enough is being done to report transversally on the policy.

6.2.5. Recommendation 5: Developing a communication strategy for the policy

Currently, the COCT website is being revamped, which the ERMD sees as a positive step in improving electronic communication across all city policies, strategies, programmes and

projects. The IMEP features on the current website under the section of policies, but it is difficult to locate and there isn't any additional information that can be found regarding the overarching environmental policy for the COCT. It is therefore recommended that, when the new policy is being developed, a communication strategy is also put in place to ensure that awareness regarding the policy doesn't fade away like that of the IMEP, but rather that it needs to be communicated over time.

6.2.6. Recommendation 6: Develop policy at the strategic level

This recommendation, like some of the previous ones, builds and adds to those that were made in the 2013 review of the IMEP. This comes from the recommendation that the city has to develop an environmental policy that sits at the same strategic level as that of the social and economic growth strategies of the COCT. It is therefore recommended that the new policy needs to sit within the mayor's office with the SPU. Officials from the ERMD can be moved into that unit so as to ensure that the all three pillars of social, economic and the environment sit at the same strategic level. A higher institutional positioning for the policy will create more political commitment and will in turn make a difference to functions implementing the policy.

6.3 Potential Themes for Future Research

The study has indicated that there are potential themes for future research relating to this subject. A critical aspect that would warrant further research would be to review the development of new M&E indicators that will be used to measure the degree to which environmental goals and objectives have been achieved, in order to ensure that those policy implementation tools/instruments are efficient and effective in implementing said policy. Furthermore, future research can be conducted on evaluating implementation models and in doing so improve existing models or develop new models for implementation. The 6 –C Protocol for example, it can be argued that another seventh “C” should be added in the form of “Coordination”. This variable will relate to assessing intergovernmental coordination and co-operation between local, provincial and national government in improving policy implementation.

6.4 Conclusion

In the opening chapter of this thesis, the researcher made reference to the overall aim of this study, which was in essence to evaluate the implementation process of the IMEP. The reasoning behind the study was not aimed at adding new knowledge to the discourse of public policy implementation, but was rather dedicated to understanding the process of implementation and, in doing so, analysing it and finding ways of improving future implementation initiatives around environmental policy and reaching some pertinent conclusions on implementation. The study has in a number of ways also confirmed some of the theoretical approaches that were discussed in chapter two on public policy implementation, especially the importance of the 6-C Protocol in ensuring that those variables have been considered in the formulation and implementation of policy. Furthermore, the study verified the observations made with relation to the evolution of public policy implementation. These include that implementation cannot be thought of as being mechanistic in nature, with regards to administrators being able to automatically implement that which comes from the top. Policy implementation is a complex political and administrative process that requires commitment from various stakeholders in order for it to be successful. Further research on this topic is possible. With the ERMD developing a new revised environmental policy, research can be done regarding the development of M&E indicators to measure, track and report on the implementation of the policy.

References

- African Union Report. 2014. *Integrating HIV and Gender Into Environmental Assessment Processes in Africa: Using Capital Development to Contribute to Domestic Financing for Health*. [Online]. Available from: www.africa-union.org. [Accessed 15 November 2014].
- ANC, African National Congress. 1994. *The Reconstruction and Development Programme: A Policy Framework*. Johannesburg: African National Congress, Umanyano Publications.
- Anderson, J.E. 1976. *Cases in public policy making*. New York: Praeger.
- Barret, S. & Fudge, C. 1981. *Policy and Action: Essays on the implementation of public policy*. London: Methuen.
- Berman, P. 1978. The study of macro- and micro implementation. *Public Policy*, Spring, 26(2).
- Berman, P. 1980. Thinking about programmes and adaptive implementation matching strategies to situations. In H.M. Ingram & D.E. Mann (eds.). 1980. *Why policies succeed or fail*. Beverly Hills: Sage.
- Birkland, T.A. 2001. *An Introduction to the policy process: theories, concepts and models of public policy*. New York: M.E. Sharpe.
- Bridgman, P. & Davies, G. 2000. *Australian Policy Handbook*. 2nd edition. Sydney: Allen & Unwin Publishers.
- Bridgman, P. & Davies, G. 2003. What use is a Policy Cycle? Plenty, if the aim is clear? *Australian Journal of Public Administration*, 62(3):98-102.
- Brodkin, E.Z. 2000. *Investigating policies practical meaning: street level research on welfare*. [Online]. Available from: <http://www.jcpr.org> [Accessed 20 February 2014].
- Brynard, P. 2000. Policy implementation. In *Improving Public Policy*. Edited by F. Cloete & H. Wissink. Pretoria: Van Schaik.
- Brynard, P. 2005. *Policy Implementation: Lessons for service delivery*. Paper presented at the 27th AAPAM Annual Roundtable Conference. Livingstone: Zambia.

Brynard, P. 2005. Policy Implementation: lessons for service delivery. *Journal of Public Administration*, 40 (4.1):649-664.

Brynard, P. & de Coning, C. 2006. Policy Implementation. In *Improving public policy: from theory to practise*. 2nd Edition. Edited by F. Cloete, H. Wissink & C. de Coning. Pretoria: Van Schaik.

Brynard, P. 2007a. The Policy Gap in South Africa. *Journal of Public Administration*, 42(3):357-365.

Brynard, P. 2007b. Multiplicity in Public Policy Implementation. *African Journal of Public Affairs*, 1(1):34-40. Brynard, P. & de Coning, C. 2006. Policy Implementation. In *Improving public policy: from theory to practise*. 2nd edition. Edited by F. Cloete, H. Wissink & C. de Coning. Pretoria: Van Schaik.

Brynard, P., Cloete, F. & de Coning, C. 2011. Policy Implementation. In *Improving Public Policy: Theory, practise and results*. 3rd edition. Edited by F. Cloete & C. de Coning. Pretoria: Van Schaik.

Calista, D. 1994. Policy Implementation. In Nagel, S. (ed.). *Encyclopaedia of policy studies*, pp 117-155. New York: Marcel Dekker.

Campos, E. & Root, H. 1996. *The key to the Asian miracle: making shared growth credible*. Washington: Brookings Institution.

City of Cape Town. 1998. *State of the Environment Report*. Cape Town.

City of Cape Town. 2003. *Integrated Metropolitan Environmental Policy*. Cape Town.

City of Cape Town. 2003a. *Biodiversity Strategy*. Cape Town.

City of Cape Town. 2003b. *Coastal Zone Management Strategy*. Cape Town.

City of Cape Town. 2003c. *Public Environmental Awareness, Education and Training Strategy*. Cape Town.

City of Cape Town. 2005a. *Air Quality Management Plan*. Cape Town.

City of Cape Town. 2005b. *Cultural Heritage Strategy*. Cape Town.

City of Cape Town. 2007. *Energy and Climate Change Adaption Strategy*. Cape Town.

City of Cape Town. 2008. *Framework for a Strategy and Action Plan for the Management of Invasive Alien Species in the City of Cape Town*. Cape Town.

City of Cape Town. 2009. *Draft Coastal Protection Zone By-Law*. Cape Town.

City of Cape Town. 2009. *IEMPIMEP Environmental Agenda 2009-2014*. Cape Town.

City of Cape Town. 2009a. *City of Cape Town Environmental Agenda 2009-2014*. Cape Town.

City of Cape Town. 2009b. *Local Biodiversity Strategy and Action Plan*. Cape Town.

City of Cape Town. 2010. *Energy and Climate Change Adaption Strategy*. Cape Town.

City of Cape Town. 2010. *Environmental Resource Management Department: Departmental Business Plan*. Cape Town

City of Cape Town. 2011. *Moving Mountains: Cape Town's Action Plan for Energy and Climate Change*. Cape Town.

City of Cape Town. 2011. *Public Environmental Awareness, Education and Training Strategy*. Cape Town.

City of Cape Town. 2012a. *Cape Town Spatial Development Framework*. Cape Town.

City of Cape Town. 2012b. *City of Cape Town City Development Strategy*. Cape Town.

City of Cape Town. 2012c. *Integrated Development Plan 2012-2017*. Cape Town.

City of Cape Town. 2012d. *OneCape2040: from vision to action*. Cape Town.

City of Cape Town. 2012. *State of the Environment Report*. Cape Town.

City of Cape Town. 2013-2014. *Environmental Resource Management Department: Departmental Business Plan*. Cape Town

City of Cape Town. 2013a. *Departmental Business Plan of the Environmental Resource Management Department for 2013-14*. Cape Town.

City of Cape Town. 2013b. *Review and re-drafting of the City of Cape Town's Integrated Environmental Management Policy, Phase One: Scoping Report*. Cape Town.

Cloete, F. 1999. *At full speed the tiger cubs stumbled...Lessons from South-East Asia about sustainable public service delivery*. Unpublished research report. Centre for Advanced Studies. Singapore: National University of Singapore.

De Coning, C. & Gunther, S. 2009. Programme management as a vehicle for integrated service delivery in South African public sector. *Africanus*, 39(2):44-53.

De Coning, C. & Wissink, H. 2011. Nature, role and history of public policy. In *Improving Public Policy*. Edited by F. Cloete & C. de Coning. Pretoria: Van Schaik Publishers.

De Leon, P. & Weible, C.M. 2010. Policy Process Research for Democracy: A Commentary on Lasswell's Vision. *International Journal of Policy Studies*, 1(2):23-34.

Development Bank of Southern Africa (DBSA). 2012. *SADC Environmental Legislation Handbook 2012*. 3rd edition. Development Bank of Southern Africa.

Du Plessis, A. 2009. Some comments on the sweet and bitter of the National Environmental Law Framework for Local Environmental Governance. *SA Public Law*, 24(1):56-96.

Dye, T.R. 1995. *Understanding Public Policy*. Englewood Cliffs, NJ: Prenticehall.

Edwards, G.C. & Sharkansky, I. 1978. *The Policy Predicament: Making and implementing public policy*. San Francisco: W.H. Freeman.

Elmore, R.F. 1979. Backward Mapping: Implementation research and policy decisions. *Political Science Quarterly*, 94(4).

Elmore, R.F. 1985. Forward and backward mapping: reversible logic in the analysis of public policy. In K. Hanf & A.J. Tooten. *Policy implementation in federal and unitary systems: questions of analysis and design*. Dordrecht, Netherlands: Martinus Nijhoff.

Fuggle, R.F., Rabie, M.A., Strydom, H.A. & King, N.D. 2009. *Environmental Management in South Africa*. 2nd edition. Cape Town: Juta.

Gallopín, G. 2003. *A Systems Approach to Sustainable Development*. ECLAC/Government of Netherlands. Sustainable Development and Human Settlements Division. Santiago: Economic Commission for Latin America.

Glasson, J., Therivel, R. & Chadwick, A. 2012. *Introduction to Environmental Impact Assessment*. 4th edition. Abingdon: Routledge.

Goggin, M.L., Bowman, A., Lester, J.P. & O'Toole Jr., L.J. 1990. *Implementation theory and practise: toward a third generation*. Glenville: Scott Foresman/Little Brown.

Grindle, M.S. 1980. Policy content and context in implementation. In *Politics and policy implementation in the third world*. Edited by M.S. Grindle. Princeton: Princeton University Press.

Grindle, M.S. & Thomas, J.W. 1991. *Implementing Reform: Arenas, Stakes and Resources. Public Choices and Policy Changes*. Baltimore: Johns Hopkins University Press.

Gubic, K. 2004. *Cape Town is first African city to adopt and environmental policy*. IMIESA.

Hargrove, E.C. 1983. The Search for Implementation Theory. In *What Role for Government?* Edited by R.J. Zeckhauser & D. Leebaert. Durham: Duke.

Hattingh, J. 2001. Conceptualising Ecological Sustainability and Ecologically Sustainable Development in Ethical Terms: Issues and Challenges. *Annale*, 2:1-30.

Henry, N. 2001. *Public Administration and Public Affairs*. Upper Saddle River: Prentice Hall.

Hill, M. & Hupe, P. 2002. *Implementing Public Policy*. London: Sage Publications.

Hjern, J. & Hull, C. 1982. Implementation research as empirical constitutionalism. *European Journal of Political Research*, 10:105-115.

Howlett, M. & Ramesh, M. 2003. *Studying Public Policy: Policy Cycles and Policy Subsystems*. Toronto: Oxford University Press.

Jennings, P. 2011. *An assessment of the formulation of permit conditions associated with environmental authorisations and implications for compliance monitoring*. MA thesis. East London: University of Fort Hare.

Jordan, A. 1995. *Implementation Failure or Policy Making? How do we theorise the implementation of European Union (EU) Environmental Legislation?* CSERGE Working Paper, CEG:95:118.

Kendal, S. 2008. *Implementation of public policy: Issues of theory and practise*. USA: Helium, Inc.

Khosa, M.M. 2003. *Towards effective service delivery*. Synthesis report on the project entitled 'Closing the gap between policy and implementation in South Africa. Research Report No. 98. Johannesburg: Centre for Policy Studies.

Kraft, M.E. & Furlong, S.R. 2007. *Public Policy: Politics, Analysis and Alternatives*. 2nd edition. Washington DC: CQ Press.

Kraft, M.E. & Furlong, S.R. 2014. *Public Policy: Politics, Analysis and Alternatives*. 5th edition. Washington DC: CQ Press.

Laros, M. 2015. Personal Interview. 4 May. Bellville.

Laswell, H. 1951. The policy orientation. In *The Policy Sciences*. Edited by D. Lerner & H. Laswell. Stanford: Stanford University Press.

Leipziger, D.M. 1997. *Lessons from East Asia*. Ann Arbor: University of Michigan.

Lindblom, C.E. 1979. Still muddling not yet through. *Public Administration Review*, 39(6):517-526.

Linders, S. & Peters, B.G. 1987. A design perspective on policy implementation: the fallacies of misplaced prescription. *Policy Studies Review*, 6(3):459-475.

Lipsky, M. 1978. Standing the study of public policy implementation on its head. In W.D. Burnham & M.W. Weinberg. *American politics and public policy*. Cambridge: MIT.

Lipsky, M. 1980. *Street-level Bureaucracy: Dilemmas of the individual in Public Services*. New York: Russel Sage Foundation.

Lowi, T.J. 1963. American business, public policy, case studies and political theory. *World Politics*, 16.

Lowi, T.J. 1972. Four systems of policy, politics and choice. *Public Administration Review*, 32:298-310.

Madue, S. 2008. Policy implementation in a turbulent environment. *Journal of Public Administration*, 43(3.1):197-206.

Mazmanian, D.A. & Sabatier, P.A. 1981. *Effective Policy Implementation*. Lexington: Heath.

- Mazmanian, D.A. & Sabatier, P.A. 1983. *Implementation and public policy*. Glenville, IL: Scott Foresman.
- McDonald, D.A. 2002b. *Environmental Justice in South Africa*. Cape Town: University of Cape Town Press.
- McLaughlin, M.W. 1987. Learning from experience: Lessons from policy implementation. *Educational Evaluation and Policy Analysis*, 9(2):171-178.
- Meadows, D.H., Meadows, D.L., Randers, J. & Behrens, W.W. 1972. *The limits to growth*. New York: Universe Publishing.
- Migdal, J.S. 1988. *Strong societies and weak states: state-society relations and state capabilities in the third world*. Princeton: Princeton University Press.
- Mnculwane, V.V. 2008. *An Assessment of the Implementation of the Service Delivery Improvement Policy in the Department of Arts, Culture and Tourism in KZN*. Master's thesis, Stellenbosch: Stellenbosch University.
- Mthethwa, R.M. 2012. Critical dimensions for policy implementation. *African Journal of Public Affairs*, 5(2):36-47.
- Najam, A. 1995. Learning from the literature on policy implementation: A synthesis perspective. *International Institute for Applied Systems Analysis*, Working Paper:1-70.
- Ndeke, E.N. 2011. *A critical review of the development of sustainability indicators for the City of Cape Town: A focus on environmental and socio-economic sustainability*. MPhil thesis. Stellenbosch: University of Stellenbosch.
- O'Toole, J.L. Jr. 1984. Policy Recommendations for Multi-Actor Implementation: An Assessment of the field. *Journal of Public Policy*, 6(2):181-210.
- O'Toole, L.J. 1986. Policy recommendations for multi-actor implementation: an assessment of the field. *Journal of Public Policy*, 6(2).
- O'Toole, L.J. Jr. 2000. Research on policy implementation: assessment and prospects. *Journal of Public Administration Research and Theory*, 10(2):263-288.
- Paudel, N.R. 2009. A critical account of policy implementation theories: Status and reconsideration. *Nepalese Journal of Public Policy and Governance*, 25(2):36-54.

Peart, R. & Wilson, J. 1998. Environmental Policy Making in the new South Africa. *South African Journal of Environmental Law and Policy*, 5:237-267.

Pellegrinelli, S. 1997. Programme management: organising project-based change. *International Journal of Project Management*, 15(3):141-149.

Pressman, J.L. & Wildavsky, A. 1973. *Implementation: How great expectations Washington are dashed in Oakland; or why it's amazing that programs work at all*. Berkeley: University of California.

Rein, M. & Rabinowitz, F.F. 1978. Implementation: A theoretical perspective. In *American politics and public policy*. Edited by W.D. Durham & M.W. Weinberg. Cambridge: MIT.

Republic of South Africa. 1970. *Mountain Catchment Areas Act (No. 63 of 1970)*. Pretoria: Government Printer.

Republic of South Africa. 1989. *Environmental Conservation Act (No. 73 of 1989)*. Pretoria: Government Printer.

Republic of South Africa. 1996. *Constitution of the Republic of South Africa*. Pretoria: Government Printer.

Republic of South Africa. 1998. *The National Environmental Management Act (No. 107 of 1998)*. Pretoria: Government Printer.

Republic of South Africa. 1998. *National Forest Act (No. 84 of 1998)*. Pretoria: Government Printer.

Republic of South Africa. 1998. *White Paper on Environmental Management Policy for South Africa*. Pretoria: Government Printer.

Republic of South Africa. 1999. *The National Heritage Resources Act (No. 25 of 1999)*. Pretoria: Government Printer.

Republic of South Africa. 2000. *The Municipal Systems Act (No. 32 of 2000)*. Pretoria: Government Printer.

Republic of South Africa. 2003. *The National Environmental Management: Protected Areas Act (No. 57 of 2003)*. Pretoria: Government Printer.

Republic of South Africa. 2003. *The National Environmental Management Amendment Act (No. 46 of 2003)*. Pretoria: Government Printer.

Republic of South Africa. 2004. *The National Environmental Management: Biodiversity Act (No. 10 of 2004)*. Pretoria: Government Printer.

Republic of South Africa. 2004. *The National Environmental Management Second Amendment Act (No. 8 of 2004)*. Pretoria: Government Printer.

Republic of South Africa. 2008. *The National Environmental Management Third Amendment Act (No. 62 of 2008)*. Pretoria: Government Printer.

Republic of South Africa. 2008. *The National Environmental Management: Integrated Coastal Management Act (No. 24 of 2008)*. Pretoria: Government Printer.

Republic of South Africa. 2008. *The National Environmental Management: Waste Act*, (No. 59 of 2008). Pretoria: Government Printer.

Republic of South Africa. 2004. *The National Environmental Management: Air Quality Act (No. 39 of 2004)*. Pretoria: Government Printer.

Root, H. 1996. *Small countries, big lessons: governance and the rise of East Asia*. New York: Oxford University Press.

Rossouw, N. & Wiseman, K. 2004. Learning from the implementation of environmental public policy instruments after the first ten years of democracy in South Africa. *Impact Assessment and Project Appraisal*, 22(2):131-140.

Sabatier, P.A. 1986. Top-down and bottom-up approaches to implementation research: a critical analysis and suggested synthesis. *Journal of Public Policy*, 6 (1).

Savard, J.F. 2012. Policy Cycles, in L. Côte & J. F. Savard (eds.). *Encyclopaedic Dictionary of Public Administration*. [Online]. Available from: www.dictionnaire.enap.ca [Accessed 6 June 2014].

Scharpf, F.W. 1978. Interorganizational policy studies: issues, concepts and perspectives. In K.J. Hauf & F.W. Scharpf (eds.). *Interorganizational policy making: limits to coordination and central control*. London: Sage.

- Schofield, J. & Sausman, C. 2004. Symposium on implementing public policy: Learning from theory and practise-introduction. *Public Administration*, 82(2):235-248.
- Shapiro, J.N. 1978. *Implementing Public Policy: the "Fogo Process" and community action*. PhD thesis. Princeton University.
- Smit, G. 2009. *Sustainable energy solutions for the residences of Stellenbosch University*. MPhil thesis. Stellenbosch: University of Stellenbosch.
- Smith, T.B. 1973. The policy implementation process. *Policy Sciences*, 4(2):197-209.
- Spalding-Fecher, R., Winkler, H. & Mwakasonda, S. 2005. Energy and the World Summit on Sustainable Development: What Next? *Energy Policy*, 33:99-112.
- Stevenson, A. 2010. *Oxford Dictionary of English*. 3RD edition. Oxford: Oxford University Press.
- Stone, D. 2008. Global public policy, transnational policy, communities and their networks. *The Policy Studies Journal*, 36(1):19-38.
- Swilling, M. & Annecke, E. 2012. *Just Transitions: Explorations of sustainability in an unfair world*. Claremont: UCT Press.
- Tshautshau, A. 2013. *Folk EIA: A useful but often neglected tool*. [Online]. Available from: <http://www.environment.co.za/environmental-laws-and-legislation-in-south-africa/folk-eia-a-useful-but-an-often-neglected-tool.html> [Accessed 11 June 2014].
- Turton, A., Ashton, P. & Cloete, E. (Eds.). 2003. *Transboundary rivers, sovereignty and development: Hydrological drivers in the Okavango River basin*. Pretoria and Geneva: AWIRU and Green Cross International.
- Van Baalen, J. & de Coning, C. 2011. Programme management, project management and public policy implementation. In *Improving Public Policy: theory, practise and results*. Edited by F. Cloete & C. de Coning. Pretoria: Van Schaik.
- Van der Linde, M. 2006. *Compendium of South African Environmental Legislation*. Pretoria: Pretoria University Law Press.
- Van Meter, D.S. & Van Horn, C.E. 1975. Policy Implementation Process. *Administration and Society*, 6(4):445-488.

Warwick, D.P. 1982. *Bitter Pills: Population Policies and their Implementation in Eight Developing Countries*. Cambridge: Cambridge University Press.

Western Cape Government. 2003. *Bio-regional Planning Manual*. Cape Town.

World Bank. 1997. *The state in a changing world*. World Development Report 1997. Washington, DC: World Bank.

World Commission on Environmental Management. 1987. *Our Common Future*. United Nations.

Youthed, J. 2009. *Assessing and managing the potential for compliance default of applications submitted in terms of South Africa's environmental impact assessment regulations*. D.Phil thesis. Pretoria: UNISA.

Annexure A: IMEP Sectoral Approaches

The following diagram depicts the overall implementation of an integrated environmental management strategy for the CCT.

4.1 Air

4.4 Fauna and Flora

A commitment to the conservation of biodiversity in the CCT through:

- The improvement, enhancement and protection of endemic biodiversity.
- Recognising that the conservation and protection of terrestrial biodiversity is a priority.
- Recognising and protecting the unique coastal and marine environment and biodiversity of the City of Cape Town.
- Recognising that the City of Cape Town's most valuable resource is its natural environment which provides a range of essential goods and service.
- Recognising the negative impacts of invasive alien species on the environment.
- Prioritising fire management within the City's boundaries.
- Ensuring sustainable and equitable land-use practices within the City of Cape Town.

4.5 Cultural heritage

A commitment to ensuring that the diverse cultural heritage of the City of Cape Town is preserved, protected and enhanced. This includes:

- Recognising the rich cultural history of the City of Cape Town.
- Recognising the importance of cultural practices.
- Recognising all cultures and religions represented within the City of Cape Town.
- Including cultural values, sites and landscapes of historic significance, areas of scenic beauty and places of spiritual importance in planning and decision-making.

4.6 Urbanisation and housing

A commitment to recognising that shelter and services are needed for a growing population, whilst at the same time recognising that environmental features and systems need protection. This commitment includes:

- The promotion of clean, healthy, safe and efficient living environments, which take communities, their needs and the surrounding environment into account.
- Emphasis being placed on upgrading the living environments of the urban poor.
- Recognising the need to manage uncontrolled urban expansion, which threatens the resources of the City of Cape Town and lead to unwanted social, environmental and economic costs, by working towards creating a more compact metropolitan area.
- Recognising the impact of light pollution.
- Recognising that an effective Metropolitan Open Space System (MOSS) is essential to the protection of biodiversity in the City of Cape Town and ensuring access to recreational opportunities for all.



4.7 Infrastructure

The recognition that the supply and delivery of infrastructure can both improve our living environments and cause environmental impact. This commitment includes:

- Ensuring that the principles and approaches of sustainable development are applied in the planning and delivery of infrastructure.
- A commitment to locally appropriate infrastructure which enhances the living environment.
- A commitment to prioritising under-resourced areas for the development of infrastructure.

4.8 Transportation

A commitment to the recognition that transportation is needed for access to facilities and work opportunities, but consumes valuable resources and contributes to environmental degradation. This commitment includes:

- Seeking to maximise the benefits while minimising environmental costs of transportation systems.
- A commitment to working towards a public transport system that is safe, accessible and affordable.
- A commitment to minimising the need to travel and promoting the use of public transport as the preferred mode of passenger travel.
- Promoting appropriate transportation systems which reduce environmental impacts while increasing mobility for all.

4.9 Energy

Recognising the importance of energy and its role in development and the negative effects that energy production may have on the environment, a commitment to sources of energy with the least impact on the environment and health of communities. This commitment includes:

- The consideration of energy efficiency in all functions and activities.
- A commitment to discourage the use of inefficient energy fuels and those that are characterised by high pollution levels.
- Reducing energy wastage.
- Investigation, support and promotion of alternative, renewable, cleaner and safer energy sources.

4.10 Waste

A commitment to the need for an integrated waste management strategy that addresses both the production and disposal of solid and liquid wastes, as well as the safe collection, transport and disposal, and the reduction of illegal dumping. This commitment includes:

- A commitment to minimising and preventing waste.
- Supporting and promoting waste recycling initiatives.
- Recognising that combating illegal dumping and littering in the City of Cape Town is a priority.
- A commitment to safely managing all hazardous wastes.

4.11 Economy

A commitment to the recognition that the environment of the City of Cape Town is its greatest asset and that sustainable development requires economic growth, the creation of jobs and the reduction of currently high levels of poverty in the City of Cape Town. This includes a commitment to:

- Recognising the interdependence of economic development, poverty and environment.
- Supporting economic development strategies and initiatives that promote global competitiveness, provide jobs, reduce poverty and improve living and business environments.

4.12 Environmental health

A commitment to the Constitution of South Africa which guarantees the right of all South Africans to an environment which is not detrimental to their health and well-being. This includes recognition that:

- Poor living environments contribute to the increased risk of infectious diseases such as HIV/Aids and TB.
- Environmental health risks in the City of Cape Town result largely from poverty, the inadequate provision and access to basic services, overcrowding and inadequate shelter, and from air and water pollution.
- The unsafe supply of food increases the incidence of food-borne diseases.
- Excessive levels of noise pollution negatively affect the living environment.
- Health risks result from poor occupational health and safety conditions.

4.13 Environmental education and training

A commitment to supporting and promoting appropriate environmental education and awareness throughout the City of Cape Town and within local government structures. This commitment includes:

- Education and awareness of health and safety, waste and recycling, environmental rights and the resources of the City of Cape Town.
- Supporting environmental education which enhances the understanding and appreciation of the environment and the opportunities that it creates while promoting an ethic of collective responsibility of the environment amongst all citizens.

4.14 Safety and security

In recognising that many communities in the City of Cape Town experience an unacceptable incidence of crime, a commitment to supporting crime prevention and the reduction of crime is needed. This includes a commitment to:

- Supporting and development, which enables sustainable livelihoods for all and contributes to reducing incidence of crime by addressing vulnerability.
- Promoting safe living environments for all CCT communities.
- Considering safety and security in all planning aspects.



4.15 Environmental governance

Recognising that effective environmental governance in the City of Cape Town is in the process of being established. As such, a commitment to:

- The continued growth in the skills and resources available for environmental governance in the City of Cape Town.
- Supporting community-driven environmental projects.
- Promoting environmental structures in the communities.
- Open communication between local government, communities and all stakeholders.
- Enforcement of and compliance with environmental legislation, regulations and controls.
- Environmental governance on behalf of people and the living environment.
- Promoting partnerships to ensure effective environmental governance.
- Including communities in the decision-making process.
- Promoting safe living environments for all City of Cape Town communities.

Annexure B: IMEP Leadership Pledge

Leadership Pledge to IMEP

I, the leadership of local government in the City of Cape Town, shall ensure that this Integrated Metropolitan Environmental Policy, or IMEP, is implemented in all activities, plans, programmes and actions undertaken by local government in the performance of its constitutional and other obligations for service delivery and economic development in the City of Cape Town. I commit myself to the promotion of the principles of sustainable development which aim to meet the needs of today, whilst protecting and enhancing resources for use in the future.

I further commit myself to initiating, supporting and driving strategies, projects and programmes in accordance with which the principles and approaches in the IMEP are implemented and to ensure compliance by all stakeholders and roleplayers. This I do in accordance with the Constitution and National Environmental Policy of South Africa and the rights and responsibilities these place on me as a steward of our resources and promoter of sustainable development.

Name _____ Designation _____

Signed _____ Date _____



CITY OF CAPE TOWN | ISIXEKO SASEKAPA | STAD KAAPSTAD

Annexure C: City of Cape Town Environmental Agenda Targets 2009-2014.

1. Biodiversity

Lead Department: Environmental Resource Management

Current (2009) baseline: 42.8% of areas identified to meet our biodiversity targets are under formal management and secured for future generations.

2014 Target: At a minimum, 60% of areas identified to meet our biodiversity targets will be under formal management, including proclamation and stewardship agreements, and will be secured for future generations. The City will increase its investment in these biodiversity areas so as to build their role as key economic, social, recreational and educational assets

2. Alien Invasive Species

Lead Department: Environmental Resource Management

Current (2009) baseline: *Baseline for target a. only.*

16 853,87 hectares of alien plants exist within Protected areas and the Biodiversity Network. The 2009 Invasive alien plant and aquatic weed baseline data is not yet available for water bodies, city, national, provincial and private land other than protected areas and the biodiversity network. These targets are subject to obtaining baseline data.

2014 Target:

Invasive Alien Plant management:

- a. 60% of the surface area of the Protected Areas and Biodiversity Network will be in maintenance (defined as cleared with three follow-up operations);
- b. 80% of the surface area of city owned land other than Protected Areas and the Biodiversity Network will be in maintenance;
- c. 40% of the surface area adjacent to protected areas and the biodiversity network will be in maintenance;
- d. Aquatic invasive plant species will be reduced to 80% of the 2009 coverage in the city's water bodies;
- e. 5 x emerging invader species identified in 2009 will be reduced by 90% of the 2009 occurrence.

Invasive Alien Animal management:

- a. The Indian house crow population in the city will be eradicated;
- b. The guttural toad population in the city will be eradicated;
- c. The mallard duck population in the city will be eradicated.

3. Air Quality

Lead Department: City Health

Current (2009) baseline:

- a. Some areas of the city exceed the NO₂ guideline amount of **40µg/m³**.
- b. Some areas of the city exceed the SO₂ guideline amount of **50µg/m³**.
- c. Many areas of the city exceed the PM₁₀ guideline amount of **40µg/m³**.
- d. Many areas of the city exceed the PM₁₀ guideline of no more than **35 days** where levels exceed **50µg/m³**.

2014 Target:

- a. Annual Average NO₂ levels will not exceed **40µg/m³** in any part of the City, with an aim to reduce annual average levels to no more than **30µg/m³** in order to ensure ecological protection
- b. Annual Average SO₂ levels will not exceed **50µg/m³** in any part of the City with an aim to reduce annual average levels to no more than **20µg/m³** in order to ensure ecological protection.
- c. Average annual PM₁₀ levels will not exceed **40µg/m³** in any part of the City.
- d. The number of times PM₁₀ exceeds the daily guideline of **50µg/m³** will be reduced to a maximum of **35 days** in any part of the City.

4. Carbon Footprint

Lead Department: Environmental Resource Management

Current (2009) baseline: Current per capita Carbon Footprint of 6,21 tonnes (total of 20 126 952 tonnes) of CO₂ equivalents

2014 Target: Per capita Carbon Footprint will be reduced to an annual average of 5 tonnes (a total of 20 million tonnes) of CO₂ equivalents.

5. Energy Efficiency

Lead Department: Electricity; Environmental Resource Management

Current (2009) baseline: Electricity usage in 2007:11 874 Gwh.

2014 Target: Electricity efficiency will be improved to reduce the total electricity consumption in 2014 by 10% from 2007 total electricity consumption figures.

6. Climate Change Adaptation

Lead Department: Environmental Resource Management

Current (2009) baseline: A draft Climate Change Adaptation Plan of Action has been prepared.

2014 Target: The development and endorsement of a progressive and effective Climate Change Adaptation Plan of Action that remains up-to-date with current international information and trends and which fosters and promotes city, community and individual resilience to environmental change.

7. River Health

Lead Department: Catchment, River and Stormwater Management; Water and Sanitation

Current (2009) baseline:

a. 2006/7 River Health Survey results:

Natural	Good	Fair	Poor	Unacceptable
2 (5%)	3 (8%)	8 (22%)	18 (49%)	6 (16%)

- b. 25% (1 out of 4) of designated inland and estuarine recreational water bodies meet DWAF minimum standards for intermediate recreational contact
- c. 29% of rivers meet the DWAF 80th percentile for intermediate contact recreational guideline for levels of *E. coli* pollution
- d. 31% of vleis meet the DWAF 80th percentile for intermediate contact recreational guideline for levels of *E. coli* pollution
- e. 64% of coastal water quality monitoring points are compliant with coastal water quality guidelines (80th percentile guideline)
- f. Baseline not yet established.

2014 Target:

The city will invest in its wastewater and storm water treatment and management capacity to ensure that by 2014:

a. River Health Survey results will improve to reflect at a minimum

Natural	Good	Fair	Poor	Unacceptable
3 (8%)	6 (16%)	17 (46%)	9 (24%)	2 (5%)

- b. 100% (4 out of 4) of designated inland and estuarine recreational water bodies will meet DWAF minimum standards for intermediate recreational contact

- c. 50% of rivers will meet the DWAF 80th percentile for intermediate contact recreational guideline for levels of *E. coli* pollution
- d. 50% of vleis will meet the DWAF 80th percentile for intermediate contact recreational guideline for levels of *E. coli* pollution
- e. 95% of coastal water quality monitoring points will be compliant with coastal water quality guidelines (80th percentile guideline)
- f. 70% of all private industries will have been captured within the effluent permit process

8. Water

Lead Department: Water and Sanitation

Current (2009) baseline: Use of potable water stands at 285.1 million kilolitres, with a daily water use per capita of 223.3 litres.

2014 Target: Use of potable water will be capped at a maximum of 290 million kilolitres per year. With expected population growth and increasing levels of service equity, daily water use per capita will need to be reduced to an average of 180 litres per day to meet this target

9. Waste Minimisation

Lead Department: Solid Waste Management

Current (2009) baseline: Baseline not yet established.

2014 Target: A 20% reduction in waste sent to landfill.

10. Housing

Lead Department: Housing

Current (2009) baseline: Retrofit process started in 2009.

2014 Target: All social housing delivered beyond 2009 will be built with fitted ceilings while 40% of existing pre-2008 social houses will have been retro-fitted

11. Coastal Protection

Lead Department: Environmental Resource Management

Current (2009) baseline: A draft Coastal Protection Zone has been prepared.

2014 Target: The formalisation and implementation of an effective Coastal Protection Zone (CPZ) across the length of our City's coastline, the formal management of, and investment in this CPZ to ensure environmental integrity, conservation of coastal ecosystems and enhanced recreational opportunity while protecting the City for storm surge events.

12. Urban Edge

Lead Department: Spatial Planning

Current (2009) baseline: The City of Cape Town Urban Edge has been defined and approved.

2014 Target: Urban development will be contained within the defined and approved Urban and Coastal Edge, and cultural landscapes, particularly of the Cape Winelands, will be given a level of protection.

13. Environmental Compliance

Lead Department: Environmental Resource Management

Current (2009) baseline: Baseline and indicators are in development. As part of the compliance strategy the situation assessment is in progress.

2014 Target: Compliance by the city in performing its functions to the national environmental approval process will be 100% for new capital projects. The City's environmental compliance strategy will be completed and implemented.

14. Environmental Education and Communication

Lead Department: Environmental Resource Management

Current (2009) baseline: The City currently:

- a. Provides approximately 30 professional internship opportunities per year
- b. Reaches 60 000 school children through education campaigns, annually.
- c. Communicates a general environmental awareness message to the citizens of Cape Town on an ad hoc basis.

2014 Target: Recognising that environmental change requires commitment by all its citizens, and that empowerment of people is central to this commitment, the City environmental awareness, information, education and skills development programme will:

- a. Provide 150 professional internship opportunities over the period 2009-2014
- b. Reach 300 000 school children through education campaigns
- c. Communicate a general environmental awareness message to the citizens of Cape Town at least four times per year. This will be in addition to focussed campaigns

15. Outdoor Advertising

Lead Department: Environmental Resource Management

Current (2009) baseline: The mapping of scenic resources, environmentally sensitive areas, heritage areas and rural landscapes which are vulnerable to the impacts of billboards, is not available as an 'Areas of Control map' to the general public and members of the outdoor advertising industry.

2014 Target: Key scenic resources, environmentally sensitive areas, heritage areas and rural landscapes which are vulnerable to the impacts of billboards, will be mapped as Areas of Maximum Control in terms of the outdoor advertising by-law.

16. Cultural Heritage

Lead Department: Environmental Resource Management

Current (2009) baseline: Current digitising and mapping into a single City-wide Heritage Resources Inventory is underway in terms of the IMEP Cultural Heritage Strategy. The software to roll this information out to the public counters at the District offices is under development, but is not yet accessible to officials nor is it publicly accessible.

2014 Target: An inventory of audited cultural heritage sites and places in the metropolitan area will be publicly accessible

17. Administrative Operations

Lead Department: All City departments.

Current (2009) baseline: Baseline not yet established. Audit study required in order to determine baseline.

2014 Target: The City of Cape Town will reduce the resources used in the course of its administrative operations by the following: Paper - 10%, Fuel - 10%, Water - 10% and Electricity - 10%. Improved resource efficiency will be included in City procurement processes.

Annexure D: Research Schedule

An Analysis of Policy Implementation in Environmental Management of the Integrated Metropolitan Environmental Policy (IMEP) and its Environmental Agenda

General:

This research schedule has been developed for the purpose of consulting officials of the Environmental Management Department of the City of Cape Town to assess what variables effect implementation of the Integrated Metropolitan Environmental Policy (IMEP) and its Environmental Agenda. This study makes use of Brynard’s 5 “C” Protocol in the analysis of the implementation of IMEP by the mandated agency. Scholars have increasingly added a 6th variable to the 5 “C” Protocol, namely communication and as a result of this the variable has been included in the analysis. The protocols or variables are as follows:

- Policy as Content
- Institutional Context
- Commitment to Implement
- Capacity to Implement
- Clients and Coalitions
- Communication

Respondents should note that their identity will be protected and individual names or statements will not be used in the study.

Name of Interviewee

Position in the Department

Date of Interview

Section A: Policy as Content

Description: The content of policy refers to the process of interaction between the setting of policy goals and the actions geared to achieving them.

Question 1: In general terms can you identify the objectives of IMEP and its Environmental Agenda?

.....
.....

Question 2: Can you describe the different tools/instruments that were used to achieve these objectives?

.....
.....

Question 3: How do you view the content of the policy statements and policy guidelines in IMEP?

.....
.....

Question 4: What is the Department's role with respect to the IMEP, its Environmental Agenda and its implementation?

.....
.....

Question 5: How do you rate the "Content" of the Policy?

Very Good	
Good	
Bad	
Very Bad	

Why?.....

Section B: Institutional Context

Description: context here refers to how the institutional context is shaped by the larger context of social, economic, political and legal realities of the institutional corridor through which implementation must pass.

Question 6: How is the IMEP aligned with national and provincial environmental management policy, legislation, strategy (PGDS/PSO Objectives) and plans (e.g NDP etc.)

.....

Question 7: What in your opinion are the key issues that need to be addressed on an institutional level to ensure the success of policy implementation?

.....

Question 8: How do you rate the “Context” of Policy?

Very Good	
Good	
Bad	
Very Bad	

Why?.....

Section C: Commitment to implement

Description: commitment refers to how strong the commitment is from those responsible for implementing the policy, to successfully implement the policy.

Question 9: In your opinion, how strong is the leadership commitment and support for the successful implementation of the IMEP and its Environmental Agenda? Please comment

.....

Question 10: What can be done to improve staff commitment and their contributions to the implementation process?

.....

Question 11: In your opinion, how does organisational culture impact the implementation process of IMEP?

.....

Question 12: How do you rate the “Commitment” of the Policy?

Very Good	
Good	
Bad	
Very Bad	

Why?.....

Section D: Capacity to Implement

Description: what are the tangible (human, financial, material, technological etc.) and intangible (motivation, commitment, willingness etc.) requirements needed to achieve policy implementation?

Question 13: In relation to M&E of the policy, please comment on whether there are sufficient resources in place to monitor and evaluate the implementation of the policy?

.....

Question 14: Is there sufficient use of information technology in place to support implementation? Please comment

.....

Question 15: In your opinion, are there any capacity constraints affecting policy implementation?

.....

Question 16: How do you rate the “Capacity” of the Policy?

Very Good	
Good	
Bad	
Very Bad	

Why?.....

Section E: Clients and Coalitions

Description: refers to those stakeholders that actively support a particular implementation process.

Question 17: Who are the key partners of the City of Cape Town in implementing the IMEP and its Environmental Agenda; and why are they the key partners?

.....

Question 18: What are the institutional arrangements in place that fosters Inter-governmental cooperation as well as building relationships with civil society to improve policy implementation?

.....
.....

Question 19: What should be the role of government, private sector and civil society in implementing environmental objectives?

Government

.....
.....
.....
.....
.....

Private Sector

.....
.....
.....
.....
.....

Civil Society

.....
.....
.....
.....
.....

Question 20: What in your opinion, are the perceptions of stakeholders regarding the quality and value that IMEP and its Environmental Agenda holds?

.....
.....

Question 21: According to you, what are the constraints (if any) hindering client and coalition participation in the implementation process?

.....

Question 22: How do you rate “Clients and Coalitions” of the Policy?

Very Good	
Good	
Bad	
Very Bad	

Section F: Communication

Question 23: What are the specific communication issues that warrant further attention?

.....

Question 24: Is there a specific communication strategy in place to support the IMEP?

.....

Question 25: How would you rate the communication between the role players responsible for the implementation of IMEP?

Very Good	
Good	
Bad	
Very Bad	

Why?.....

Section G: Conclusion

Question 26: In your opinion, what needs to be done to improve the implementation process of IMEP and its Environmental Agenda?

.....
.....

Question 27: Do you have anything else that you would like to add to the discussion?

.....
.....