

Tyhileka madubela - Comments: Strengthening of the work of the Weather Service through the South African Weather Service Amendment Bill, 2011

From: Tirusha Thambiran
To:
Date: 2012/01/11 03:43 PM
Subject: Comments: Strengthening of the work of the Weather Service through the South African Weather Service Amendment Bill, 2011

Dear Ms Tyhileka Madubela

Please find below a list of comments regarding the "Strengthening of the work of the Weather Service through the South African Weather Service Amendment Bill, 2011".

List of comments:

Amendment of Schedule 1 to Act 8 of 2001

18 – "The provision of advice to government regarding ambient air quality matters"

This statement is vague and clarity is required on the specifics of what SAWS intends to advise government on regarding ambient air quality matters. Furthermore, why has different terminology been used in this point, as opposed to just using the term 'ambient air quality information', which was introduced as a new definition in the Bill, and used in the Amendment of section 3 of Act 8 of 2001 to redefine the objectives of SAWS.

Furthermore, the amendments of Schedule 2 do not necessarily align with the definition of 'ambient air quality information services' as stated in the bill. Please see specific comments below:

Amendment of Schedule 2 to Act 8 of 2001

- 12-14: This section highlights a vast array of air quality related tasks that SAWS will undertake. It is written as if to imply that SAWS will have the sole responsibility to conduct such air quality work in the country. However, in reality there are research and numerous tertiary institutions in South Africa who share the same goal of SAWS, that is, to provide an improved understanding of ambient air quality for the benefit of all South Africans. A more holistic and inclusive approach to this section that recognises the importance of a collaborative approach with research councils and tertiary institutions is therefore needed.

- 15: "Air quality consultations, including advice to industries regulated in terms of the Air Quality Act..." This is very vague; specifics are needed to clarify that SAWS will only be able to consult with industry as per the Bill's definition of air quality information.

- 16 & 17: Given the intentions to offer these services mentioned one would expect there to be an indication of a plan to build capacity within SAWS to be able to deliver these services, of which there are no details provided for in the amendments.

- 18: This point is vague and requires clarity. The sale of processed data for use in models may be a

viable commercial service to offer. However, it is stated in section 5.2.1 of the National Framework for Air Quality Management that 'A central aim of the SAAQIS is that it will allow the public access to air quality information'. As SAWS is also the custodian of the SAAQIS, the general sale of ambient air quality data would be in conflict of its role in the SAAQIS and further in violation of our current air quality policies. It needs to be made clear, that unprocessed air quality data is freely available via the SAAQIS. Furthermore, there needs to clarity on how the 'packages' of data which can be purchased will differ from the data that is freely available via the SAAQIS, bearing in mind existing reporting requirements.

Yours sincerely,

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