To: The Deputy-Director: Abstraction and Storage
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Pietermaritzburg, 4 June 2012

Comment to the Draft General Authorisation for the Taking and Storage of Water,
General Notice 288 of 2012, by the Department of Water Affairs

We, members of the Tshintsha Amakhaya alliance, express our full support to the submission by Dr Barbara van Koppen of the International Water Management Institute and colleagues, as well as the submission by the Surplus People Project. This document is a submission to complement and highlight specific concerns raised in their submissions.

Research on rural poverty, food insecurity, and resource use

Tshintsha Amakhaya (TA) is an action learning platform of civil society organisations that supports local community struggles in land and agrarian reform and promotes alternative models of land tenure and agricultural production for food sovereignty.

The TA partners conducted a survey among constituent rural communities in 12 local municipalities in the Eastern Cape, KwaZulu-Natal, Limpopo, and Western Cape Provinces. 1743 people were interviewed across different tenure types. The aim of the survey was to assess levels of income and poverty, food insecurity, land tenure, crop and livestock production, and access to farmer support services.

The findings of the survey are of utmost importance to the Draft General Authorisation for the Taking and Storage of Water, General Notice 288 of 2012 issued by the Department of Water Affairs.
Farming as survival strategy

The survey found that 28% of households identified themselves as farmers. Yet only 2% earned their main income from agriculture. 50% of households in the sample lived below the poverty line, while 31% reported to go hungry sometimes or often. Most severe cases of food insecurity occurred on communal lands and in informal settlements.

Food insecure households tended to engage more in crop production, most likely to alleviate the impact of hunger. Fewer people with land went hungry than those without land. Thus land is an important asset to people. Of the sampled households 84% had access to land. Land sizes, however, were small. 71% of people with crop land had less than 1 ha.

Water access and organization

Rivers, streams, or dams were the primary water source for crops (68%) and livestock (76%). Taps and standpipes were important for crop production in Limpopo, and for crops and livestock in the Western Cape. Besides taps and standpipes, households in KwaZulu-Natal also used boreholes and rainwater harvesting to grow crops.

85% of respondents generally did not pay for water. The 50% of households who live below the poverty line, and rely on small plots for food production will not be able to afford water charges as proposed in the draft General Authorisation, and will spiral into even more destitute circumstances.

63% of households had members who belonged to some form of organisation. Yet only 9.4% belonged to a water forum. This begs the question how their interests will be safeguarded.

In conclusion, we urge the Department to extend the deadline for submissions, and to ensure that the key concerns about the plight of disadvantaged rural households who will be adversely affected by the draft GA will be addressed in full.

Yours sincerely,

[Signature]

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