



2019 - 2020 Pre-Budget Consultations Proposals

Platform Moris Lanvironnman (PML) is a network of NGOs and committed individuals who have sustainability at heart. Some of the NGOs in our network rank among the oldest and/or most active organisations promoting sustainability and raising awareness on sustainability issues.

As outlined in the invitation for submissions and proposals in the context of Pre-Budget consultations, the aims of the forthcoming Budget include **promoting a more inclusive and equitable society and further addressing the problem of poverty investing in education, training and other skills needed for the youth, and building greater resilience to the impact of climate change**. PML is therefore pleased to make this submission and some proposals in connection with these aims.

1. Review of the National Development Strategy (NDS)

Since 2015, PML has been drawing the attention of the Authorities on the need to review and update of the National Development Strategy (NDS) to no avail.

It is recalled that **in February 2016, the Ministry of Housing and Lands announced a review of the NDS**. To date the fate of this review is unknown.

A review of the NDS and associated Outline Schemes is of paramount importance in view of the risks brought on by the **effects of climate change and the need to increase our resilience to natural and man-made disasters**. The impacts of climate change on our society have been clearly demonstrated in recent years; flooding events are becoming chronic in some areas while new human settlement areas both in urban and rural zones are being affected every year. Although required, **building of drains alone will not resolve land drainage issues** because storm water needs to eventually be dealt with in a way that it does not flood other localities nor pollute rivers and lagoons with solid waste, sediments and other pollutants. This calls for regional land drainage systems that cannot be the responsibility of individuals or private promoters but of local authorities and ultimately the State.

Proposals :

- a. **Urgent review of the NDS to include climate change adaptation policies in relation to flooding and coastal inundation.**
- b. **Implement regional drainage systems along Sustainable Urban Drainage System (SUDS) principles.** These include the adoption of nature-based and other measures such as construction of swales, wetlands, bio-retention areas, infiltration trenches, detention ponds.
- c. In the case of undertakings requiring a Drain Impact Assessment, include **strict specifications in EIA/PER/Building and Land Use permits** to the effect that storm/rain water from drains discharged into the open environment and/or the regional drainage system does not contain solid waste, sediment and other pollutants.

2. Review the policy of allocating leases for coastal development

The coastline around Mauritius is under **high ecological stress**. Decades of poor development and mismanagement of coastal ecology as well as **rising sea levels due to climate change** pose serious threats to the coastline, which in many locations is receding. The past months bear evidence to the risks coastlines are exposed to generally. The number of hotels that have had recourse to coastal works in the past 36 months in an attempt to avoid the loss of their beachfront to erosion is a strong indication of the physical threats faced by beach tourism.

As well as being a precious asset to the tourism industry, the country's beaches have a **high social value** through being the most prized location for Mauritians to relax and enjoy the outdoors with family and friends. A careful management of this asset, from both an ecological and social perspective, is therefore called for.

Proposal:

A review of the current coastal development policy is urgent. In this regard, PML proposes that with the sustainability of the Mauritian tourism industry, environmental protection and the well being of the Mauritian public in mind, this review **be undertaken with the participation of all stakeholders including the civil society at large.**

3. Reinstating Strategic Environmental Assessment in the Environment Protection Act (EPA)

Strategic environmental assessment is an important tool to assess the environmental impacts of the **proposed options/scenario** within a plan, programme or strategy and then to make recommendations about mitigation measures that might reduce any possible negative impacts. The knowledge obtained through SEA can also contribute to public decision making.

In many jurisdictions, strategic environmental assessment is also used to assess national and local programmes and plans.

For example, the European Directive 2001/42/EC pertains to the assessment of the effects of certain plans and programmes on the environment and its objective is:

*“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to **promoting sustainable development**”.*

Strategic tools such as strategic environmental assessment, sustainability appraisal, environmental bench marking and sustainability reporting provide important indicators not only **for establishing social and environmental impacts but also for monitoring of performance.**

There is a need to incorporate Strategic Environmental Assessment in the Environment Protection Act for the assessment of plans/strategies, programmes and policies. The content of a SEA as well as the different stages of preparation of a SEA and outcomes should be elaborated in the Act.

SEA must not become or perceived to be another procedural hurdle to overcome but a strategic tool towards sound decision-making and sustainability.

Proposal:

PML requests that the EPA be amended to include Strategic Environmental Assessment with specific sections and clauses pertinent to SEA.

4. Sustainable Solid Waste Management

It is recalled that the 2017-2018 Budget a sum of Rs 1 million had been allotted in the Capital Budget under the sub-headings “New Material Recovery Facility” and “New Compost Plant” which would have gone towards the setting up of a municipal solid waste (MSW) sorting and resource recovery system. However, PML notes that despite consultative workshops held in connection with the elaboration of a Strategy for a solid waste management system for Mauritius in March and May 2017, and mention of the development of a “*comprehensive Waste Recycling Framework*”, no draft solid waste management strategy is yet available to stakeholders. Since then, the only measure that will soon be implemented is a two-rupee tax on single-use plastic household items such as plates and cups. This will only have an impact if it forms part of a transition strategy out of single-use plastic. **PML requests that the draft solid waste management strategy be made public immediately.**

PML notes with concern that **Solid Waste Recycling Ltd, a composting facility** that started operating late 2011 to process 300 tonnes of unsorted solid waste daily is no longer operating and that all the unsorted solid waste it was processing is now sent to Mare Chicose. It is our contention that any such facility operating outside of a holistic solid waste management strategy and plan will be faced with operational constraints.

Proposals :

As the Government has still not finalised a strategy for MSW,

1. PML proposes as an immediate action for the next fiscal year that the State takes over and operates the composting facility at La Chaumière for the benefit of the country.
2. PML reiterates proposals made in the previous Budget consultations: A comprehensive and sustainable municipal solid waste (MSW) management plan implies looking at waste “from cradle to cradle”, that is from reduction at source to reuse and ultimately to final disposal. **Reduction of waste** is at the top of a sustainable solid waste management hierarchy, and is followed by Recycling and Reuse. In this context, the setting up of a **Sustainable Solid Waste Management** would include:

- a. **A further reduction of solid waste generation: A phased ban on all single-use plastic. In the very short term on Styrofoam containers and a phased substitution of PET bottles by glass bottles.**

In 2015, the Ministry of Environment, Sustainable Development, and Disaster and Beach Management implemented a ban on plastic bags which are a bane in as much they are source of wasteful consumption, generate waste that block drains, cause flooding, end up as harmful ocean trash and pose health risks. The same can be said of plastic bottles and Styrofoam take-away containers, which are also a threat to public health. Moreover, **Styrofoam containers are not recyclable. Because of their high environmental and social costs, they should be banned.** Eco-friendly substitutes to Styrofoam containers, such as carton boxes, are readily available.

As an alternative to plastic bottles for water, carbonated and other drinks, glass bottles are a ready substitute. Glass bottles were used in Mauritius in the recent past but phased out since PET bottles are more ‘economical’ than the reuse of glass bottles. However the high environmental costs of disposal PET containers and their significant negative impacts on biodiversity are left to be borne by public funds.

Discussions with bottlers on a phased substitution of PET bottles by glass bottles should be initiated to find a sustainable solution.

- b. **A simple form of sorting at source**, i.e by providing for collection of household waste in two separate and differentiated bags/bins, one for green organic waste (yard and kitchen) and one for all recyclable “dry waste” such as paper/plastics/carton/glass. This simple form of sorting would allow for unsoiled dry wastes to be further sorted at Materials Recovery Centres.
- c. **Installation of Recycling bins** in village councils and municipal wards by providing additional funds to local authorities for the installation of same at key collection points.
- d. **The setting up of Materials Recovery Centres at transfer stations.**

At the **Materials Recovery Centres** the waste is further sorted with the view of creating a **viable recycling industry** and **green jobs**. These centres may also alleviate the problems of illegal waste dumping in Mauritius.

- e. The setting up of a system for the **recycling of used tyres**.
- f. The setting up of an appropriate **system for the collection of e-wastes and bulk waste**.
- g. **Fiscal Incentives to the recycling industry**: Granting of **“zero-VAT” status to recyclers** so that recycling equipment and material are exempted from VAT.

Most of the proposals above will create green jobs and have high potential to alleviate poverty, achieving gender equality and contribute to building a more inclusive and equitable society.

5. Support to an integrated unit of education for sustainable development

PML acknowledges the good results of the "Eco School" programme run by a local NGO (Reef Conservation) as the national operator of the Foundation for Environmental Education (FEE) and with the full back up of the Ministry of Education and the Indian Ocean Commission under the ISLANDS project 2015-2017. There is a strong need to have an **integrated unit of education for sustainable development** that will have the proper means to be fully operational in order to sustain the dynamic created by the Eco-School Programme led by the "National Eco School Committee".

Proposal : PML therefore proposes that Government makes provision for financial support to such programmes implemented by NGOs with the support of a public body – in this case, the Ministry of Education -, the private sector and regional/international organisations.

6. National Environment Fund

All Environment-linked taxes, levies and fees to be vested with the National Environment Fund.

Nearly all such taxes, levies and fees presently go into the Government General Revenue to fund the general budget and do not serve the purpose they are designed for. Only a small fraction of taxes and levies on other solid waste items are used to compensate exporters of used PET bottles. Section 60 of the EPA 2002 (as subsequently amended) dealing with the National Environment Fund has been amended by the Finance Act 2016 and Finance Act 2018 and could be further amended to include the measure proposed.

Proposals:

- a. All environmental taxes are invested into the environmental sector; and that all **environmental taxes and levies on all consumables** that produce a solid waste problem should be used to **improve collection rates of recyclable material and to finance the recycling industry** into a

sustainable activity or **to promote the production and use of alternatives** to single-use consumables for example.

- b. Disbursements from the Fund are in proportion to the amount paid in by the different sectors (waste, energy, air pollution, etc.). **Businesses/NGOs/Social enterprises/Cooperatives involved in recycling/reuse could directly benefit from funds originating from existing levies and taxes on aluminum cans, plastic bottles and single-use plastic household items.**

7. Reverse the trend in loss of land under sugar cane cultivation

Loss of land under sugar cane cultivation, especially by small planters, is increasing. This downward trend needs to be reversed for economic, social and environmental reasons.

Proposal:

Bagasse and other sugar cane by-products be rewarded fairly and to their true worth.

8. Special tax on conversion of agricultural land to property development

The loss of green cover to built-up areas is of particular concern.

Proposal :

A **special tax** be levied on agricultural land being converted to property development, and that **the tax is used to support reforestation of grazing lands and rehabilitation of river reserves**, as well as other environmental protection projects such as **nature-based climate change adaptation measures to prevent flooding.**

Platform Moris Lanvironnman

15th April 2019