



African Climate Reality Project

South Africa NDC position statement:

Enhancing South Africa's Nationally Determined Contributions: A Call for Increased Ambition, Financial Transparency, and Gender Responsiveness



Background:

The climate crisis is one of the most pressing issues of our time, with far-reaching consequences for the health, livelihoods, and well-being of individuals and communities worldwide. As the [Intergovernmental Panel on Climate Change \(IPCC\)](#) warns, global warming is likely to exceed 1.5°C above pre-industrial levels, leading to catastrophic impacts, including sea-level rise, droughts, and extreme weather events. However, the effects of climate change are not felt equally; vulnerable populations, including low-income communities, indigenous peoples, and women, bear the brunt of climate-related disasters, exacerbating existing social and economic inequalities.

In South Africa, the climate crisis intersects with systemic injustices, such as apartheid-era spatial planning, resource extraction, and environmental degradation, perpetuating disparities in access to resources, infrastructure, and decision-making power. As the country revises its Nationally Determined Contributions (NDC), it is crucial to prioritise both scientific ambition and social justice, recognising the intricate links between climate change, human rights, and sustainable development.

In the upcoming revision of the Nationally Determined Contributions due in February 2025, it is important that South Africa's NDC be improved to address the urgent need for climate action, gender equality, and transparent climate finance mechanisms, ensuring a truly just transition that leaves no one behind.



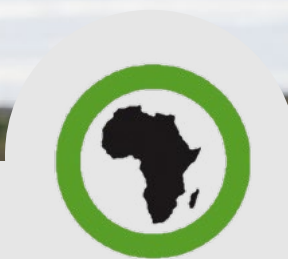
Strengths

We commend the government for the following in the 2021 NDC:

A notable strength of the South African NDC is its focus on a just transition as a central element. The 2021 NDC underscores the importance of this approach in steering the country's development towards greater sustainability; it also highlights the urgent need to decrease dependence on coal. The NDC also mentions that in order to ensure a just transition, it is essential to implement measures for workforce reskilling and job creation, enhance social protection, promote new green sectors, diversify sectors that are still dependent on coal, and develop labour and social plans to address the decommissioning of ageing coal-fired power plants and related infrastructure. A truly just transition is key to climate action, particularly for South Africa.

The 2021 NDC's comprehensive approach to economy-wide emission reduction targets. The 2021 Nationally Determined Contribution (NDC) covers all sectors of the country's economy, underscoring a commitment to transformative climate action. By setting economy-wide emission reduction targets, the NDC aims to drive substantial change across diverse sectors, marking a significant step forward in climate commitment. This is in line with [Article 4.4](#) of the Paris Agreement which encourages developing countries to enhance their mitigation efforts and transition towards comprehensive emission reduction targets in consideration of their unique national circumstances.

In response to critical climate challenges, the 2021 NDC addresses South Africa's water scarcity issues by detailing strategies for improved water conservation and management. This includes increased investment in water infrastructure and the promotion of water-efficient practices in sectors that are heavy consumers of water, such as agriculture and industry.



Gaps

The 2021 NDC does not sufficiently address the need for enhanced climate finance:

Adequate financial support is essential for the successful implementation of effective climate strategies, particularly for vulnerable communities and sectors. The current commitment to emission reductions necessitates significant international and domestic funding, yet the NDC lacks a clear outline of these financial requirements and accompanying plans about how financing will be mobilised and disbursed. Additionally, there is an overemphasis on private funding rather than public finance, which is a missed opportunity to leverage the mandate of Public Financial Institutions (PFIs) for sustainable development, which supports people and the planet. This approach is vital for addressing ongoing inequality and structural exclusion..

Inadequate focus on gender consideration:

A significant gap in South Africa's Nationally Determined Contribution (NDC) is its insufficient focus on gender considerations. While the current NDC acknowledges women's involvement in the planning process and emphasises the need for gender integration, it lacks a detailed framework for addressing gender issues within its policies. It also fails to provide specific actions or strategies for mobilising the financial and technical resources necessary for effective gender mainstreaming. Additionally, the NDC does not include gender-disaggregated data on the impacts of climate change, which is crucial for informed policy development. Contextual and place-based planning is essential to account for diverse lived experiences, ensuring that interventions are impactful and sustainable.

Although the 2021 NDC references initiatives like the Climate Change Gender Action Plan (GAP), it does not translate these into actionable strategies. Furthermore, while it recognizes the importance of enhancing access to resources for women's organisations, the lack of clear actions or frameworks limits the effectiveness of gender-responsive climate initiatives. This insufficient integration of gender considerations ultimately hinders the NDC's ability to effectively address climate change and the inequalities it perpetuates.

Climate Smart Agriculture:

Ignoring local knowledge practices and not engaging with vulnerable communities prioritises western solutions that are not appropriate for the African context. This is particularly true for the NDC in relation to agriculture and land use. The mention of Climate Smart Agriculture is concerning as the concept has come under scrutiny over the last few years by climate justice groups. Some of the criticisms include the lack of clear criteria on what is or is not Climate Smart Agriculture, the lack of social and environmental safeguards, and the undermining of farmer voices and local knowledge. It is also noted that Climate Smart Agriculture is often used by agribusiness corporations to greenwash their practices.

In a country where small scale farmers and growers are the backbone of the food system, it is concerning that the NDC makes little mention of traditional agricultural practices which can enhance resilience and productivity, especially in rural areas where modern technologies are inaccessible. Farmers using indigenous growing methods, which are often better suited and more adaptive to changing climate conditions, frequently lack access to credit, insurance, and markets. However, the NDC fails to address this challenge. Despite the crucial role they play in food production, these farmers are often excluded from key discussions and decision-making processes related to agricultural support and development.



Recommendations

We recommend that the government of South Africa, in its 2025 revision of the NDC:

Strengthen Emission Reduction Targets: To effectively align with the 1.5°C limit and achieve net zero emissions by 2050, South Africa must adopt more ambitious and stringent emission reduction goals. The proposed greenhouse gas (GHG) emission targets of 398–510 Mt CO₂ for 2025 and 350–420 Mt CO₂ for 2030 are currently deemed “insufficient” by Climate Action Tracker (CAT). In fact, this independent scientific project has stated that if fully implemented, South Africa’s current policies would lead to more than 3°C of warming if all other countries followed a similar level of ambition.

To prevent this trajectory, South Africa needs to enhance these targets. Prioritising stronger policies will not only reflect global climate commitments but also position South Africa as a leader in sustainable development.

Ensure Clear Synergy Between the NDC and the IRP: The interdependence between the Nationally Determined Contributions (NDC) and the Integrated Resource Plan (IRP) underscores the necessity for a cohesive and coordinated implementation strategy. Effective climate action requires both the NDC and the draft IRP to function in harmony.

The success of the emission reduction targets outlined in the NDC relies on the energy strategies defined in the IRP. If the IRP continues to emphasise coal reliance, it undermines the NDC goals, revealing a fundamental flaw in implementation plans that fail to align these critical policies. The 2023 draft IRP, which serves as the country’s energy blueprint, emphasises extending the life of coal, contrary to the NDC’s objectives of reducing its usage. Coal-fired power stations are significant contributors to South Africa’s emissions, and the IRP’s continued reliance on coal directly undermines the NDC’s commitment to emission reductions.

Furthermore, the IRP Horizon One proposes delays in decommissioning existing coal stations, posing a substantial challenge to achieving the country’s climate targets. While the plan does not advocate for new coal-fired power stations—a positive step—delaying the phase-out of existing plants will hinder progress and diminish South Africa’s credibility in international climate discussions.

Additionally, the 2023 IRP falls short in promoting renewable energy initiatives. The expectation of only 22% renewables in the power system by 2030, down from 33% in the 2019 IRP, is insufficient when aiming for the 75–93% share required for a 1.5°C-compatible pathway.

The Department of Forestry, Fisheries and the Environment (DFFE) needs to call for a revision of the IRP to eliminate reliance on coal and establish ambitious targets for renewable energy generation. This includes committing to a more aggressive timeline for decommissioning coal-fired power stations to effectively and timely meet climate targets.



Operationalise the Climate Change Act: It is crucial to ensure that the Nationally Determined Contributions (NDC) explicitly reference and align with the objectives of the Climate Change Act, signed in 2024. This integration should include legally binding sectoral emission targets and carbon budgets as outlined in the Act. This not only enhances accountability but also demonstrates a genuine commitment to a sustainable future. Moreover the Climate Change Act is designed to provide a comprehensive framework for adaptation, mitigation, and institutional coordination. It aims to integrate the country's greenhouse gas (GHG) emissions reduction trajectory into national law, reflecting a significant commitment to sustainability. The Act mandates that all climate policies align with its goals and requires all levels of government to address climate adaptation needs. Furthermore, the proposed legislation has the potential to make the NDC legally binding by establishing sectoral emission targets and carbon budgets for major GHG emitters every five years.

Enhance Gender Mainstreaming: The NDC must develop context-specific gender-climate mainstreaming strategies that cater to the needs of women in both urban and rural settings. Plans should be grounded in a thorough understanding of the differential impacts of climate change and outline strategic actions to mitigate them. This emphasis on contextual and place-based planning will ensure that the NDC effectively addresses gender issues and enhances the material well-being of women across South Africa. There should also be a prioritisation of meaningful stakeholder engagement by actively including civil society, community representatives, and gender experts in all stages—planning, monitoring, adoption, and implementation. This approach must move beyond tokenism and be institutionalised as a core requirement. By engaging diverse voices, the NDC can better understand and tackle the unique challenges that climate change poses to women and children, fostering a comprehensive and inclusive climate policy.

The NDC must set ambitious targets for gender-responsive indicators that drive transformative climate policies. By focusing on policies that address the root causes of vulnerability, the NDC can promote a holistic approach to climate action.

Develop detailed monitoring and evaluation models: It is crucial to explicitly outline the limitations, assumptions, and methodological approaches that will be used to account for the implementation of the NDC. This will enable the government to track success and failure of NDC implementation. These methods should also enable civil society and community oversight where local communities are involved in the planning, implementation, and monitoring of NDC projects.

Consultation and involvement of communities: The NDC consultation process must be intentional and meaningful, rather than a mere tick-box exercise. Many people struggle to understand the technical language of NDCs, which limits their ability to provide constructive feedback. Therefore, upcoming consultations should begin with a knowledge sharing session that outlines the connections between social issues and the climate crisis, emphasising that climate justice and social justice are inseparable. Climate justice recognizes the disproportionate impact of climate change on communities already vulnerable due to social, economic, and health factors, who have contributed the least to the problem.

Additionally, a knowledge session about “Climate Finance 101” should be included to help participants understand what climate finance entails and why it is important in the NDC process.

The Department of Forestry, Fisheries and the Environment (DFFE) and its institutional partners must share information throughout the NDC process to foster meaningful dialogue and effective policy implementation. The goal of these consultations is to ensure that no one is left behind in the transition to a greener economy. Transparent access to information and governance structures will support a more robust NDC process.



As a country that grapples with the reality of being ranked first on the continent for emissions and fifteenth globally, the urgency for an enhanced Nationally Determined Contribution (NDC) cannot be overstated. In contrast to the global contribution that South Africa has had to the crisis, it is also a country that has a dual experience of also being one of the most unequal societies in the world. South Africa faces a triple threat crisis: climate change, social inequality, and economic instability. These interlinked challenges demand an ambitious and bold response—one that prioritises not just environmental sustainability but also the rights and needs of the most vulnerable, those living in affected communities.

South Africa should use this moment to lead with purpose and integrity, demonstrating that a sustainable, resilient future is not just possible—it is essential. The institutional structures in place should forge a path toward a climate-secure South Africa, where every voice is heard, and no one is left behind.

