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Climate Justice Coalition Submission regarding SA's draft 2nd NDC

[The Climate Justice Coalition \(CJC\)](#) is a South African coalition of trade unions, civil society, grassroots, and community-based organisations. Together we are taking on the climate crisis by advancing a transformative climate justice agenda that seeks to overcome the deep inequality, poverty, and multiple injustices that South Africa faces.

Introduction

We submit that South Africa's international commitments under the Paris Agreement, for the coming decade, provide a pivotal opportunity to improve the coherence of our climate change response and drive alignment across relevant departments and planning processes, consistent with the principles of the Just Transition Framework as approved by Cabinet. In particular, this NDC must acknowledge the imperative to phase out fossil fuels and reform energy subsidies in order to lend credibility to the call to keep 1.5 alive.

We appeal for greater clarity and specificity throughout the document, particularly with regard to provisions for supporting marginalised and vulnerable communities, as well as ensuring transparency and accountability in implementation, including equitable access to climate finance. Cross-cutting concerns are addressed following our specific recommendations.

We dispute the claim that this draft represents South Africa's "highest possible ambition, in the context of equity," noting that key documents referenced to support this assessment (UCT 2025a & b) have not been released. We also object to references to an "IRP 2025" when the prevailing electricity plan remains the IRP2019. Publicly available information suggests that the next iteration of the IRP will be less aligned with the goals of the Paris Agreement and the Baku to Belem programme. The ambiguous reference to an additional 36 GW of renewable energy by 2035 exemplifies the broader evasiveness of this draft, which undermines credibility, slows climate action, and deters international support.

Recommendations

Mitigation

South Africa's short-term mitigation ambition should be progressively enhanced, consistent with the latest science and the Global Stocktake (GST1), by setting a target of net GHG emissions of no more than 350 Mt CO₂e in 2030. The CJC does not support the use of a range.

South Africa's medium-term mitigation target should be consistent with its fair share of global effort¹ and set no higher than 250 Mt CO₂e. This is consistent with analysis undertaken under the PCC, which supported a draft recommendation motivating 248 Mt CO₂e as the bottom of the range.

These mitigation objectives should be accompanied by indicative ceilings for major emitting sectors, including energy and specifically electricity, transport, industry, and land use. Such quantitative limits would link national targets to implementation, driving measurable progress and ensuring sector-specific accountability.

Consistent with national commitments to universal access to electricity, and the need to phase out fossil fuel subsidies, mitigation measures should commit to supporting opportunities for decentralised renewable energy development with social ownership. This should be pursued under the auspices of expanding provisions for free basic electricity, recognising the adaptation co-benefits this would provide.

In substantially improving the mitigation ambition of the second NDC the lead agent (DFFE) should explicitly give recognition to and apply the principle of inter-generational equity, considering that a lack of mitigation ambition over the coming decade and beyond will impact on multiple generations. SA must not only rapidly reduce our own emissions, but as an influential party claiming a leadership role in multilateral processes, must also set an example that is a counter-point to those actively undermining climate change response. In substantially improving the mitigation ambition of the second NDC the lead agent (DFFE) should explicitly give recognition to and apply the principle of inter-generational equity, considering that a lack of mitigation ambition over the coming decade and beyond will impact

¹ See: Harald Winkler, *South Africa's Fair Share Mitigation Targets in the Updated First NDC in an International Context* (Cape Town: University of Cape Town, 2021), [link](#); Presidential Climate Commission, *South Africa's NDC Targets for 2025 and 2030* (Pretoria: PCC, 2021), [link](#); Centre for Environmental Rights, *New Coal Power in Light of South Africa's Climate Fair Share* (Cape Town: CER, 2021), [link](#).

on multiple generations. SA must not only rapidly reduce our own emissions, but as an influential party claiming a leadership role in multilateral processes, must also set an example that is a counter-point to those actively undermining climate change response.

Adaptation

The importance of access to electricity for adapting to climate change and developing climate-resilient communities particularly for early warning systems and disaster response requires explicit recognition. Adaptation finance should therefore support local energy development planning aligned with a just transition to renewable energy.

The NDC should commit to embedding adaptation indicators within the Medium-Term Strategic Framework (MTSF) and Treasury's budgetary processes, ensuring that adaptation priorities are reflected in fiscal allocations and implementation plans.

Strengthening local government capacity further requires the establishment of a dedicated sub-national adaptation finance window, supported by embedded technical assistance and accompanied by transparency and accountability mechanisms.

Loss and damage

The NDC should address loss and damage in a more meaningful way, given South Africa's growing exposure to devastating floods, droughts, wildfires, and heatwaves. Communities on the frontlines are already suffering irreversible harm to lives, livelihoods, biodiversity, and cultural heritage, yet this reality is not adequately acknowledged.

The NDC should explicitly recognise loss and damage as a distinct pillar of climate action, alongside mitigation and adaptation. It should commit to developing a national framework that includes social protection mechanisms such as disaster insurance, compensation systems, and targeted support for displaced workers and households.

Furthermore, strong community participation particularly by women, youth, and Indigenous peoples must be ensured in shaping priorities and interventions. South Africa must also connect its national processes to global mechanisms, such as the Santiago Network on Loss and Damage and the operationalisation of the international Loss and Damage Fund. Without such commitments, South Africa risks underestimating the scale of climate-related harm and forfeiting critical opportunities to secure international support.

Means of implementation

The draft NDC does not provide a credible pathway for financing or implementing its commitments, raising serious concerns about feasibility. Clearer means of implementation are needed to ensure South Africa can both deliver on its domestic obligations and mobilise international support.

A central component of this is climate finance. The NDC should establish a transparent strategy for mobilising both domestic and international resources, with an emphasis on grant-based finance rather than loans that add to the country's already heavy debt burden. Finance deals and conditionalities must be made public before agreements are finalised, allowing scrutiny and input from Parliament, civil society, and affected communities.

Institutional alignment between Treasury, the Department of Forestry, Fisheries and the Environment, and other relevant departments is also critical, with climate finance and just transition spending integrated into the Medium-Term Strategic Framework and national budgetary processes.

In addition, the NDC should highlight the need for access to climate-resilient technologies and capacity-building support, while ensuring that local communities benefit directly from knowledge transfer. Without a detailed and credible means of implementation, the NDC risks being reduced to a plan on paper without the resources required to achieve its objectives.

Means of implementation must include fossil fuel subsidies reform. In particular it should commit to realising the opportunity for access to electricity for over one million households through decentralised roll-out of small-scale solar and clean energy technologies, which must be prioritised in the promised repurposing of the Integrated National Electrification Programme (INEP). A dedicated programme should be developed for the expansion of public transport to be integrated with electrification and support for the automotive sector must be redirected from fossil-fueled vehicles to electric vehicles.

Cross-cutting concerns

Climate change is not only an environmental issue but also a justice issue that intersects with inequality, poverty, health, food security, gender, and labour. For this reason, the NDC must embed equity and justice across all areas of implementation.

A people-centred and pro-poor approach is essential to ensure that no worker or community is left behind in the transition. Participatory processes should be strengthened to allow communities, civil society, and labour to influence and monitor implementation, with regular public reporting institutionalised to guarantee accountability.

Gender justice is another critical dimension, as women particularly those in rural and informal economies are disproportionately affected by climate impacts. Gender-responsive approaches must therefore be mainstreamed across mitigation, adaptation, and financing measures.

At the same time, young people must be given meaningful opportunities to participate in decision-making, consistent with the principle of intergenerational equity. The NDC should also integrate the climate-related risks to public health and food systems into its strategies, recognising that sustainable food systems and universal access to health services are essential for climate resilience.

By embedding these cross-cutting concerns, South Africa can ensure that its NDC not only advances climate ambition but also upholds the principles of a just transition.

We need an NDC that unambiguously serves the needs of people, planet, and future generations.

References

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