THE GREEN CONNECTION

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Attention to: Mr Mkhuthazi Steleki

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The Green Connection Comments to the Nationally Determined Contribution for 2030 - 2035 South Africa's Update

1. The Green Connection is a registered non-governmental organisation that believes economic growth and development, improvement of socio-economic status and conservation of natural resources can only take place within a commonly understood framework of sustainable development. It aims to provide practical support to both the government and nongovernmental/ civil society sectors, which are an integral part of sustainable development.
2. The Green Connection hereby makes this submission in response to the Department of Forestry, Fisheries and Environment's invitation.

Significance of Policy Alignment with International Commitments

3. The IPCC sixth assessment report[1] notes that climate change caused by human activities has resulted in extreme climate events in various regions. This has led to damage and loss of nature and people. Leaving vulnerable communities that have contributed the least to climate change more affected. As South Africa signed on the Paris Agreement to reduce its global temperatures to well below 2 degrees Celsius, The Green Connection takes into consideration the need for the government to develop policy and legislation that aligns with our international commitments.

4. The International Court of Justice Advisory Opinion on climate change clarifies existing obligations on states to consider climate change, and South Africa's NDC targets fail to address adaptation and mitigation measures for vulnerable communities.

Context: National Priorities and Circumstances

5. The draft NDC documents the progress made since 2021, including the Climate Change Act; however, it also states that the approach is based on fairness and ambition, informed by best available science. The Green Connection disputes this and notes that a more ambitious mitigation target (in the range of **250 and 280 MtCO2e**) would be aligned to fairness and science while also taking our economic circumstances and our triple challenge of poverty, inequality and unemployment into account.
6. "Climate action can't wait" and without an adequate response, the impacts of climate change will only worsen.
7. Of key importance to resolving our development and economic priorities is the research from the Powering Up Business Poll which noted that "In contrast to South Africa's vocal fossil fuel lobby, an overwhelming quiet majority (95%) in business support renewable electricity as a source of sustainable jobs and long-term economic growth." but more concerning is that half of respondents even indicated that they would relocate their operations and supply chains to markets with better access to renewables-based power systems within five years. This would obviously result in an enormous loss of jobs and increases in poverty and inequality.
8. The draft NDC clearly articulates the climate impacts experienced in SA but does not document the governance issues that conflate and exacerbate the impacts of climate change. It would be important to begin finding a solution to these challenges to reduce the impacts of climate change e.g. enforcing air quality legislation and protecting oceans from more fossil fuel expansion such as oil and gas exploration.

Adaptation

9. The impacts of climate change are already being experienced by communities in South Africa, particularly regions such as KwaZulu-Natal and the Eastern Cape, meaningful adaptation measures need to be in place to accommodate vulnerable groups- at the same time, SA needs to reduce its emissions as increased mitigation will only increase adaptation costs in the future.
10. While Goal 6 (Enhancing ecosystem-based adaptation to heat and water stress, protecting SA's natural heritage, biodiversity and improving ecosystem functioning the underpins our cultural identity, food systems, human wellbeing and our tourism economy) and 'Reducing vulnerabilities through settlement and infrastructure upgrading, enhancing food security, water catchment and ecosystem restoration, and strengthening disaster management functions is a priority for limiting loss and damage.', there is insufficient focus in the NDC on measures to protect and restore ecosystems.

11. This is particularly important in the SA context where ecosystem restoration from mining could bring co-benefits in the form of job creation and increasing equality. Goals must address all types of ecosystems—forests, mangroves, fisheries, grasslands, mountains, and water-related habitats—including halting and reversing deforestation by 2030 and aligning with the goals of the Kunming-Montreal Global Biodiversity Framework. Ecosystem-based approaches and nature-based solutions should be integrated into mitigation and adaptation solutions. Particularly as South Africa has committed to the Global Biodiversity Framework, especially target 3 to protect 30% of land and seas by 2030. There is a need for setting national targets to be able to track progress and understand the measures needed between now and 2030 to achieve these targets.

12. The Green Connection believes we need a separate, additional goal for enhancing **ocean and marine systems conservation**. This would include ecosystem protection and restoration in the oceans and coastlines as carbon sinks and have economic benefits.
13. SA has over 3000km of coastline and thousands of people dependent on the oceans for livelihoods and food security. According to StatSA, the formal fishing industry generated R19,9BN[6] in income in 2023- this is a significant economic source that needs to be protected, especially for small-scale fishers that depend on coastlines.
14. The NDC briefly mentions concerns related to food security and agriculture, however, there is no comprehensive plan to address food systems. This should be a priority in SA, especially as we have been hosting the G20 and there is a task force dedicated to food security in 2025. Actions should reduce food loss, repurpose harmful subsidies, promote sustainable agriculture, and provide adaptation support for farmers through sustainable land and water management. The largest agricultural emitters should deliver cuts in methane and nitrous oxide emissions. Ecosystem-based approaches and nature-based solutions should enhance food security and benefit local communities, including small-holder and family farmers.

15. Additionally, there is no acknowledgement of the importance of oceans and food security and yet oceans contribute substantially to food security in SA. It is important to include this within the adaptation goals.
16. South Africa's push for oil and gas exploration risks the country being locked in fossil fuel expansion and stranded assets[4]. The NDCs should make it a point that ocean governance and preservation are included, as oceans play a major role in providing oxygen and supporting the livelihoods of small-scale fishers.

Loss and Damage

17. The NDC has dedicated a whole section on loss and damage which is a significant step especially considering where we were on loss and damage in the previous NDC. South Africa has made progress in embedding loss and damage into institutional arrangements particularly through the DMA through the NDMCs to promote an integrated and coordinated system of disaster management, with special emphasis on prevention and mitigation as well as the GCF and Climate Change Response Fund.

18. It's important to express disappointment for lack of concluding the WIM review at SB63, missing an opportunity for a strong decision on loss and damage at the opening COP30 due to divergence on issues related to guidelines for including L&D in NDCs, lack of consensus on a state of loss and damage report to consolidate scientific and policy information and lack consensus on need to scale up l&d finance particularly with replenishment cycles for the Adaptation fund, GCF and FRLD coming up.

19. On a positive note, the operationalisation of the SN to deliver technical assistance to developing countries and SIDS marks a significant victory together with the regional presence established by the 54 members of the SN. However, there are concerns about the high administrative costs of the secretariat.

20. In terms of priorities, it's worth highlighting the urgency of developing and finalising guidelines for L&D reporting in the BTRs at the upcoming ExCom meeting ahead of COP30.
21. On the Baku to Belem roadmap, it is concerning that l&d was not explicitly mentioned in the roadmap's priorities despite strong advocacy from G77 and China and the AGN which SA is a part of. Therefore, reiterating the need for a continued fight for standalone targets for grant-

based finance for l&d and ensuring periodic and scaled financial commitments to the FRLD, as well as tripling finance flows to UNFCCC funds.

22. L&D requires a fair share of international climate finance from the FRLD. Therefore, a needs and cost assessment report that is updated periodically on L&D to provide a baseline for understanding the country's context, needs and appropriate responses required. This can be coordinated through the research function of the NDMC in all aspects of disaster management. Indicators for tracking progress can include a L&D needs assessment report that is published, the number of sectors assessed, and the economic and non-economic L&D types identified and documented. This can be coordinated through a loss and damage M&E framework (which DFFE, treasury and other partners have already started working on) to define and measure criteria for assessing impacts and the roles and responsibilities of all stakeholders involved, to source available data on reported damages, loss and costs of impacts of weather and climate-related disasters and ensure adequate inclusion and consultation with all affected stakeholders.

Mitigation

23. A fair and equitable NDC that's aligned with the global 1.5ºc goal—that also enables net zero global emissions by 2050—is the minimum standard for collective action, ensuring that we limit the most catastrophic impacts of climate change and secure a safe, livable future for all.
24. South Africa ranks as the largest carbon dioxide[2] emitter in Africa, particularly in the energy sector. To ensure the country remains committed to international obligations and reduces its emissions, an Integrated Energy Plan[3] needs to be developed to guide the energy investments and also serve as a guiding legal framework within the energy sector, to ensure SA is aligned to a 1.5ºc emissions trajectory, and with a minimum benchmark of not opening new upstream coal, oil, and gas.

25. The proposed draft NDC mitigation range is insufficient and unambitious. However, Maesela Kekana notes that "Climate action is necessary on all fronts – ambitious mitigation to reduce impacts…" and that climate action can't wait. It would be wise to heed these words for the NDC.
26. The modelling used to determine the DFFE mitigation range is flawed as it is based on the contested and incomplete Integrated Resource Plan 2024 which has been pushing for more gas.

27. The Green Connection believes that a **mitigation range for 2035 emissions** levels of between **250 and 280 MtCO2e** is the fair range that South Africa should commit to.
28. While South Africa's energy sector is the major contributor to emissions, the government must develop plans and regulations that will reduce greenhouse gas emissions but also ensure they are grounded on principles of the Just Transition Framework.

29. The Green Connection's concern is the promotion of gas in electricity generation as proposed in the Integrated Resource Plan, which will result in more methane emissions and continue to place vulnerable communities at risk. Gas remains a potent greenhouse gas emission which is 80 times more impactful than carbon dioxide over a 20-year period and is volatile due to geopolitical tensions which could have an effect on costs.

30. One of the key challenges to this NDC is the **lack of policy cohesion and alignment to low-carbon development outcomes** by the SA government. For example: **Climate Change Act**: Section 7 (1) states that every organ of state that exercises a power or performs a function that is affected by climate change, or is entrusted with powers and duties aimed at the achievement, promotion and protection of a sustainable environment, must review and if necessary revise, amend, coordinate and harmonise their policies, laws, measures, programmes and decisions.

31. While the act speaks to policy alignment there has been little acknowledgement of climate change in various departments e.g **Integrated Energy Plan**: South Africa's energy sector remains the largest contributor to emissions in Africa, since the National Energy Act of 2008 came to effect which mandates the Minister of Energy to review and annually develop an Integrated Energy Plan. To date, the Energy Department has not produced an energy plan that will guide energy investments for South Africa despite several calls from civil society to produce this plan which would be a guiding legal framework to sustainable development and reducing emissions.
32. NDC targets need to be supported by government policies to ensure urgent, effective implementation, developed through inclusive and participatory processes that involve **Indigenous Peoples, local communities**, **women, and youth.** Strong policy agendas will also create certainty for progress in the climate transition and spur investments.
33. The COP28 decision (paragraph 39) is clear that this, along with multi-level delivery plans, is vital to foster implementation accountability and to accelerate delivery. An effective NDC will not simply engage with the energy sector but also transport, buildings, industry, agriculture, forestry, land use, cities, and regions.

34. To effectively address climate impacts, we need to halt investments in fossil fuel projects and ensure that various departments develop policies and laws that take into consideration climate change and mitigation measures as per section 7 (1) of the **Climate Act**.
35. NDCs should reflect sustainable development and highlight the roll-out of community-owned renewable energy sources to reduce our reliance on fossil fuels.
36. Plastics - need to reduce waste as they are part of the fossil fuels value chain.
37. Modal shifts of transport which the IEP needs to model scenarios that look into a Net-zero analysis for South Africa.
38. We object to carbon trading as part of the mitigation system for SA.

Support and Means of Implementation

39. Mobilisation of climate finance must be for implementing adaptation and mitigation measures and climate response strategies in municipalities and communities while also supporting community-owned renewable energy projects.
40. However, in addition to finance and the initial KPIs mentioned, SA should also include **technology and capacity building** we can access from developed countries to support our just transition and speedily increase resilience in SA, aligned to the BRICS report on IP issued in 2025. But also, quickly phase out our reliance on fossil fuel projects.
41. On the issue of **domestic mobilisation:** all loans to the SA government should be included in the NDC as domestic mobilisation, since South Africans will have to repay these loans.
42. All sector plans should be consistent with highest ambition and should be reflected in the NDCs.

Transparency

43. The plan should explicitly list absolute emission cuts, reductions and assumptions from land use, land use change, forestry 1 for more background on the fair shares approach see e.g. Climate Equity Reference or Climate Action Tracker (LULUCF)[7], and CO2 removals.
44. The NDC also needs to be consistent with other national, sectoral, regional, and local development plans.

Conclusion

45. As the country is on a transition pathway from a high-carbon economy to low-carbon economy, it remains important to develop legal frameworks that will address risks associated with climate change but also to ensure that development prioritizes people and vulnerable communities.

Submitted on behalf of The Green Connection

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Sources

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