

Benchmarks for Intended Nationally Determined Contributions for South Africa

Submission to the Department of Environmental Affairs

2015

A joint contribution by:

- South African Climate Action Network (SACAN)
- WWF
- Adaptation Network Secretariat
- Project 90 by 2030 (Project 90)
- Alternative Information and Development Centre (AIDC)
- YouLead-Collective (YLC)
- Naledi
- One Million Climate Jobs Campaign
- Oxfam

Formulated with support from:

- African Climate Reality Project (ACRP)
- SouthSouth North (SSN)
- South African Institute of International Affairs (SAIIA)
- Gauteng Climate Group
- 350.org Africa
- Greenpeace Africa
- National Union of Mineworkers (NUM)
- Environmental Monitoring Group (EMG)
- Climate Action Network International
- Centre for Environmental Rights



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1. Preamble

This submission is an indicative position statement of a climate change civil society coalition, and additional members of the CSO caucus that endorse its content.

The following civil society members contributed to development of this document:

- South African Climate Action Network (SACAN)
- WWF
- Adaptation Network Secretariat
- Project 90 by 2030 (Project 90)
- Alternative Information and Development Centre (AIDC)
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- Earthlife Africa
- Centre for Environmental Rights

The statement is to be considered in the context of the UNFCCC negotiations, as benchmarks for South Africa's Intended Nationally Determined Contributions (INDC). It does not articulate or attempt

to articulate an optimal or aspirational goal, or a position with regards to the South African process for setting desired emissions reduction outcomes. The submission seeks to highlight that *a truly defensible and objective contribution* should be compatible with the achievement of global temperature stabilisation within 1.5 degrees.

The considerations in this document do not necessarily represent the full range of positions and perspectives of the contributors, and this submission does not limit contributors from making additional independent submissions.

2. Background

The term INDC is an acronym that stands for “intended nationally determined contribution” - first coined at the 19th session of the Conference of the Parties (COP 19) of the United Nations Framework Convention on Climate Change (UNFCCC). Parties to the UNFCCC agreed to “initiate or intensify preparations of their intended nationally determined contributions” in order to meet the ultimate objectives¹ of the UNFCCC. It was also agreed that governments in “a position to do so” would submit their INDCs by March 2015.

In September 2014, the United Nations held a Climate Summit in New York, at which governments echoed their commitments to developing and submitting INDCs on time and to enhance the ambition thereof. Thus INDCs were given further political prominence in New York ahead of the COP 20 negotiations. There is broad agreement on the urgency of submitting INDCs ahead of COP 21. However, there is a great deal of uncertainty on the scope² of INDCs as well as the link INDCs have with the post-2020 agreement.

The link between INDCs and the post-2020 agreement is not a foregone conclusion. There are diverging views from parties as to whether the INDCs are central to the agreement or whether INDCs are contributions based on the agreement (in this case INDCs would serve as annexures to the post-2020 agreement). Each perspective speaks to centrality of either the agreement or the INDCs.

¹ Article 2 of the UNFCCC, objective, “the ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner.”

² Scope of INDC – in COP20 Lima, countries agreed to a broad scope where INDCs should definitely have a mitigation component while an adaptation component is also possible if it fits national circumstances .

Decision 2/CP19 does not adequately define the nature and scope of INDCs in relation to the post-2020 agreement.

Therefore, it is crucial that INDCs are developed in time in order for the INDC to be subjected to a preliminary review and assessment to determine a fair share contribution towards achieving the objective of the Convention as set out in Article 2, while taking into consideration the different implications of the post-2020 architecture as it relates to the centrality of the INDCs.

INDCs present an opportunity for national governments to further assess and enhance the impact of climate change policy. In South Africa, it is an opportunity to reaffirm its commitment to total national emissions peak by 2025 - as stipulated in the National Climate Change Response White Paper (NCCRWP). The process of developing the INDC also presents a unique opportunity for government and interested stakeholders to better articulate and further elaborate the target range for the national emissions trajectory referred to as the Peak, Plateau and Decline (PPD) range, and to define the application of the NCCRWP as an over-arching policy. The interpretation of the PPD should reflect the urgency of achieving an equity-based emissions profile that is in line with what is required by science.

South Africa should commit to an emissions peak before 2025, peaking below 600 Mt per annum, with a decline in absolute terms to begin shortly thereafter, coming down below 300 Mt per annum no later than 2035. The INDC process presents an opportunity for South Africa to set a pathway for truly ambitious climate action. South Africa must reject the upper boundary of the PPD as incompatible with the global goal of stabilisation below 2°C average warming and should indicate how, with international support, we can get onto a declining trajectory by 2025.

3. Definition

The term “benchmark” in this document refers to thresholds, indicators or principles with which INDCs should be consistent, even if this is not explicitly stated or referenced in the document tabled in the negotiations process. Benchmarking will enable civil society and interested stakeholders to assess the quality and appropriateness of the South African INDC, and provide clear guidance to the government. The following are questions³ proposed to assess the South African INDC:

³ The listed questions have been informed by the WWF INDC assessment tool for emerging countries.

- Transparency and clarity of Information: Are the targets and information formulated in the INDC transparent and clear enough? Are the targets or intended outcomes quantified in absolute terms?
- Domestic Mitigation Ambition: Is domestic mitigation ambition high enough? Is it a fair share? What defines a fair share? (There are very different methodologies to establish this. The one that WWF uses for example is the equity reference calculator.)
- Domestic Adaptation Ambition: Are domestic adaptation efforts and objectives well specified? Is there any contribution to meeting regional adaptation needs?
- Support: Is there clear articulation of the support South Africa needs to become climate resilient? Is there a specified set of mitigation interventions, additional to the domestic pledge that would be achieved with international support?
 - a) What contributions can South Africa do without international support?
 - b) What contribution can South Africa leverage with international support?
- Equitable contribution: Is this an equitable INDC? Does it clearly consider the total mitigation required in South Africa, beyond the mitigation that would constitute a fair share of global emissions, to retain about a 50% chance of 1.5°C stabilisation and no more than 25% chance of exceeding 2°C?
 - a) The South African INDC submission needs to clarify the assumptions on which the INDC is deemed to be fair. Does it sufficiently consider South Africa's capacity and responsibility?

South Africa's vision for a global Long Term Goal (LTG) is for the world to transition to a low carbon economy; but South Africa has placed a key proviso on the said transition in the national context. The transition needs to be a just transition to a low carbon economy. Therefore, any systematic weakening of the commitment to the just transition to a low carbon economy is not supported nor welcomed⁴.

⁴ An occurrence of the systematic weakening of the narrative of the just transition to a low carbon economy has been noticed and is highlighted by the key messages in the National Development Plan (NDP). The NDP 2011 speaks of a just transition to a low carbon economy and the NDP 2013 (review version) speaks of a just transition to a lower carbon economy.

The INDC process is not optimal for the adoption of long term goals, which must include the phasing out of fossil fuels well before the end of this century. INDCs are primarily signals from which progress to and prospects of achieving the long term global goal can be assessed.

The South African long term goal must not discount fundamental principles such as common but differentiated responsibilities and respective capabilities (CBDRRC), but must provide for an accelerated just transition to a low carbon economy premised on renewable energy including all electricity to be generated from renewables by 2050.

4. Benchmarks for South Africa's INDC

4.1. General information

1. South Africa's INDC needs to be guided by section 1 and section 5 of the National Development Plan with respect to interdepartmental collaboration/policy alignment.
2. South Africa should as part of its INDC communicate the basis on which it assumes that its INDC is fair.
3. Clarity on South Africa's position with regards to the legal nature of the INDCs.
4. The civil society caucus requests full disclosure of the national processes that enabled the development of the South African INDC.
5. South Africa is available and/or willing to be subject to a national review process to determine the effectiveness of its INDC. Review process should be undertaken by a diverse technical stakeholder grouping comprising of and not limited to civil society organisations, academia, business and labour.
6. The national climate change response policy necessitates an enabling and enforceable legislative framework.

4.2. Domestic mitigation and energy

1. The INDC needs to be science-bound:
 - a. The INDC should fulfil a required by science (RBS) mitigation effort.
 - b. A clear signal to achieving a 1.5 degree consistent trajectory.

2. Collectively, all countries must reduce global emissions so that global average temperature increase does not exceed 1.5°C⁵. Therefore, South Africa's INDC needs to be determined by this objective.

3. South Africa's INDC must be based on a fixed MT CO₂ e.g. emissions on targeted years.

a) If this is not possible: South Africa's INDC could be linked to a specific base year.

The South African INDC should present a clear carbon budget to which the country will adhere to, which can be quantified for the period 2015-2050. If this budget is not clearly articulated, sufficient data should be provided to allow independent evaluation of the budget.

Emissions trajectory options:

i. Percentage reduction as per a specified reference year. If this method of calculation is retained, South Africa must specify a defined trajectory in order to ascertain the extent and costs of achieving a truly comparable 34% and 42% reduction.

ii. Rejection of a contribution based on an uncertain BAU trajectory.

4. Unrecognised potential in the Mitigation Potential Analysis. A truly ambitious and firm INDC requires a robust and material examination of the energy sector through reiteration of Integrated Resource Plan, working on the IRP2013 update as a basis. The quantum of mitigation potential assessed under the MPA should not be used as a premise for the mitigation INDC as it does not interrogate the full extent of technically available mitigation potential in South Africa.

5. The INDC should not include or suggest the following false solutions:

a. Nuclear power as a mitigation initiative.

b. Carbon Capture and Storage.

c. Fracking as an energy game changer.

6. As INDCs are articulations of national policies - the interpretation thereof will have an impact on energy policy.

a. All new energy modelling should be inclusive of full life cycle analyses and,

⁵ As per the African Ministerial Conference on the Environment African Ministers Call for Adaptation-Mitigation Parity in 2015 Climate Agreement

- b. Include all externalities, while providing full transparency on the impacts on the price paths for end users.
7. INDC development necessitates that the government researches areas not adequately covered by the MPA such as Land Use and Land Use Change and Forestry, also known as LULUCF, and waste.
8. South Africa must state its intention to participate in a global reform of fossil fuel subsidies
9. The South African INDC should sketch out its potential financial trajectory to support more low carbon action. (Raise the ambition)

4.3. Domestic Adaptation

1. Adaptation planning and implementation is supported by viable costing and resourcing.
2. Adaptation programming supports investments in long term local and national planning.
3. The implementation of the adaptation INDC should not be premised on short term project-based work/employment.
4. Adaptation funding is oriented to build local knowledge and capacity in adaptation, specifically including local authorities.
5. Increase transparency of the allocation and disbursement for adaptation funds.
6. The INDC should never be interpreted to include or suggest the following false solutions:
 - a. Genetically Modified Organisms as an adaptation strategy/technology.
 - b. Extended commercial agriculture to address food insecurity.
 - c. Desalination facilities or large dams to address water security.
7. Adaptation measures should prioritise labour intensive initiatives over economic efficiency.
8. Adaptation programming is designed to support mainstreaming of climate change concerns into all aspects of development, and to enhance existing development programming as a way of reducing vulnerability to climate change.
9. Adaptation finance must be measurably additional to existing development finance:
 - a. Quantify additional finance needs from developed nations.
 - b. Quantify additional internal investment towards adaptation initiatives.