PROJECT 90 BY 2030 | Inspire. Mobilise. A low-carbon generation.

Contacts: Richard Halsey (richard@90by2030.org.za)

Tina Schubert (tina@90by2030.org.za)

30th April 2021

Per email: climatesecretariat@environment.gov.za

Project 90 by 2030 submission in response to South Africa's proposed updated First Nationally Determined Contribution (NDC) under the Paris Agreement

Project 90 by 2030 is a social and environmental justice organisation that aims to inspire and mobilise a low carbon generation. We work with individuals, organisations, and decision makers to identify actions that can reduce their impact on the environment. Our specific focus in pushing for low-carbon actions in South Africa is centred on developing environmental leadership in youth, enhancing South African's ability to engage government to address climate change, energy poverty and the social injustices that intersect in their communities and advocating for a transition to an equitable, low-carbon energy system.

For the purposes of this submission, we will refer to the proposed update of South Africa's first Nationally Determined Contribution (NDC) released by the Department of Forestry, Fisheries and the Environment (DFFE) on 30th March 2021 as the 'proposed NDC'.

Project 90 welcomes the opportunity to comment and looks forward to engaging in the public consultations but would like to raise at this point that we were unable to meaningfully consult our constituency of youth and community representatives on this issue due to the insufficient time for public input given. The short time frame is particularly disappointing given that DFFE has had many years to prepare this process, and then only gives the public 30 days to comment on a complex issue that has had little public engagement or education around it since the INDC was drafted in 2015. As such, what we submit below is a number of concerns that we are aware of but it doesn't reflect all viewpoints of our constituency that we would have liked to submit.

We recognize and appreciate that the proposed SA NDC shows an increase in ambition compared to the first NDC from 2015. It is also good to see that the NDC is an economy wide one and makes use of absolute targets.

Board of Governors: Lorna Fuller (Director), Lynn Maggott (Chairperson), Jiska de Groot and Malie Ntshangase

Physical and Postal Address: Office 204, 16 Beach Road, Muizenberg, Cape Town, 7945
Contact us: 021 674 5094 | info@90by2030.org.za | www.90by2030.org.za

NPO number: 123 - 630
Project 90 by 2030 is an 18A registered PBO

THE INDEPENDENT CODE OF GOVERNANCE FOR NON-PROFIT ORGANISATIONS IN SOUTH AFRICA

The inclusion of an adaptation section is crucial, and we recognise the importance of both angles given that we are already experiencing the effects of climate change. However, the primary function of limiting greenhouse gas (GHG) emissions through our NDC must focus on mitigation so that less damage is done to the climate and therefore less adaptation is required. As such our comments focus mainly on the mitigation component.

The proposed increase in ambition is in the form of a reduction in the maximum emissions per year from the 2015 NDC over the 5 year periods to 2025 and 2030. These reductions are 17% and 28% respectively (equating to 510 and 440 Mt CO2-eq annual GHG emissions). We welcome the reduction of the upper level. However, the 2015 NDC upper level of 614 Mt CO2-eq was not logical. At the time, 2015 emissions were 520 Mt CO2-eq[1], so the 614 threshold was not applying any sort of pressure to reduce emissions immediately. Consequently, claiming these 17% and 28% threshold reductions is disingenuous, as it makes it seem like an ambitious step has been taken, but it is not as the upper level threshold was way too high.

As outlined below, **we do not believe the proposed NDC upper limit targets are sufficient and must be lowered substantially to both be compatible with a 1.5° C target and to be ambitious enough to access sufficient climate finance. By 2030 the upper limit should be maximum 350 Mt CO2-eq and preferable 300 Mt CO2-eq of less.**

We are not saying it will be easy to meet such significantly lower emissions targets, but we are saying that it is necessary. Climate change is one of the greatest long term threats to South Africa and its people, so we must confront the challenge head on, starting with a 1.5° C compatible NDC, coupled with a well-planned just transition so that we can achieve these goals in a way that respects social and environmental justice.

Basic principles

Below we provide 5 principles we believe are useful in assessing the proposed NDC

1. **Availability and presentation of information**

To meaningfully critique the proposed NDC it is obvious that there should be sufficient information to do so, which includes supporting documentation for any claims made. At the same time the information should be presented in a way that allows a wide range of stakeholders to comment on the proposed NDC.

2. **Ambition and alignment with 1.5° C**

There is a growing acceptance that limiting average global temperature increase to 2° C above pre-industrial levels is no longer sufficient.

1 https://www.environment.gov.za/sites/default/files/gazetted_notices/nemaqa_draft7greenhousegasinventoryeport_g43706gon989.pdf

To avoid catastrophic effects of climate change we must limit average temperature rise to 1.5° C [2]. Therefore, the proposed NDC must put us on this 1.5° C pathway**.**

3. **A long-term pathway beyond 2030**

Much like the acceptance around the requirement to limit average warming to 1.5° C, there is broad consensus that humanity must be at most a net-zero emitter of carbon by the year 2050. Zero carbon emissions would be preferable, and an earlier date even better. The intention for such a net-zero commitment is also found in South Africa's Low Emission Development Strategy[3] (LEDS). The Just Transition work of the National Planning Commission (NPC)[4] was undecided on whether it should aim for zero or net-zero.

Therefore, while the immediate contestation may be around 2025 and 2030 thresholds, the NDC needs to fit into a longer term plan for South Africa to become carbon neutral, and with minimal cumulative carbon emissions in the process.

4. **Action plans and just transition - how will the emissions targets be achieved?**

While the primary objective of the NDC may only be to lay out and justify the emissions targets, it should also show alignment to the plans that will achieve them. To have meaning, the NDC should therefore give the details of how it aligns with other policies and plans to achieve - not just a reference to what the other plans and policies are.

How much must each sector contribute and does the sum of all contributions match the target? Will the necessary shifts (particularly in the energy sector) follow a just transition plan? Where will financing come from and to what extent.

Assessment of the proposed NDC

1. **Availability and presentation of information**

The timeframe for comments for the proposed NDC is only 30 days and further 'multi stakeholder workshops' in each of the provinces as well as consultations with specific interest groups such as youth and business are planned for April and May. Overall we are dealing with a tight timeframe as well as a highly academic document which is written for the UNFCCC and climate change specialists in government, corporates and civil society. The document is exclusively aimed at a small group of professionals and it seems not intended for people not involved in this global process but very much affected by the outcome of it.

Why is the supporting documentation not supplied?

[2] https://www.ipcc.ch/sr15/

[3] https://www.environment.gov.za/sites/default/files/docs/2020lowemission_developmentstrategy.pdf
[4] https://oneworldgroup.co.za/wp-content/uploads/2019/10/NPC-JT-Vision-and-Pathways-draft-2-final.pdf

The proposed NDC has several unsubstantiated claims that are not backed up by supporting documents. For example, on page 3 it states that the proposed NDC "reflects our highest possible level of ambition, based on science and equity, in light of our national circumstances".

To make such a claim there must have been some modelling or analysis - it is not acceptable to just make a claim without making the evidence available for scrutiny. We have seen this trend with other planning documents like the Integrated Resource Plan (IRP) 2019. This lack of transparency does not foster trust, and limits public participation as the documents are not yet publicly available.

If plans and targets are really in the best interest of the country, there should be no reason to hide information.

We are aware that Just Share has requested the technical documents, and that the DFFE response was that they would be shared later. We do not see the logic in sharing the necessary technical documents *after* the period for comment is over.

We request that DFFE immediately make all supporting documentation available, and the comment period should be extended by another month so that the public can properly examine these documents.

We appreciate the inclusion of section 4d) that provides information to facilitate clarity, transparency and understanding. However, there are two points we would like to make.

1. In calculating its fair share, DFFE says it drew on the Climate Equity Reference Calculator (CERC), and that the target for 2030 is "below the CERC 2-degree allocation". However, the calculations to understand how they arrived at their said fair share have not been provided therefore, it is not possible to assess if this claim is true.

2. Climate Action Tracker (CAT) is another respected assessment tool. In Table 3 (pg 23) of the proposed NDC document, it states that "South Africa's updated target ranges for 2025 and 2030 as contained in Table 2 lie well within CAT's fair share range for South Africa." We contend that this is misleading as it does not give the public the full story.

The most recent CAT analysis [5] which looks at the upper limit, (not the range), assigns the proposed NDC as "insufficient" and is not even 2° C compatible. While this is technically considered in their outer range (least stringent) of what is considered a fair share, to be fully transparent as per the intention of Table 3 in the proposed NDC, we request that the full CAT assessment of "insufficient" is added to Table 3.

2. Ambition and alignment with 1.5° C

The two key numbers here are the upper annual level targets: 510 Mt CO2-eq to 2025 and 440 Mt CO2-eq to 2030. The lower targets should be removed, they do not add value in our opinion.
As noted in the proposed NDC these are net GHG emissions[6], and the equivalent figures in the most recent GHG inventory[7] are 513 Mt CO2-eq for 2017.

[5] https://climateactiontracker.org/climate-target-update-tracker/south-africa/

[6] Net emissions in the GHG inventory equate to total emissions minus the carbon sink effect of Forestry and Other Land Use (FOLU).

[7] https://www.environment.gov.za/sites/default/files/gazetted_notices/nemaqa_draft7greenhousegasinventoryeport_g43706gon989.pdf

With the economic downturn and effects of the COVID19 pandemic, it is likely that current GHG emissions are still around 510-520 Mt CO2-eq per year. So how then does DFFE justify a claim that 510 Mt CO2-eq is our most ambitious target to 2025 if it essentially involves doing nothing?

As stated above, CAT have assessed the proposed NDC as "insufficient" [8] - meaning it is not at all consistent with holding warming to 1.5° C as per Paris Agreement. To move into a Paris Agreement compatible range, the proposed NDC would need to reduce the upper limit to 398 Mt CO2-eq in 2025 and 348 MT CO2-eq in 2030 [9].

When it comes to the 2030 target, Project 90 recommends that the upper level should be at most 350 Mt CO2-eq, but ideally 300 Mt CO2-eq or less as that is more comfortably within the 1.5°C range and aligns with recent research by Greenpeace Africa that pegs the 2030 target at 288.4 Mt CO2-eq [10].

We recognise that these lower targets will require more action, but that is exactly what is required to meaningfully tackle climate change. Furthermore, by having targets that do actually align with the Paris Agreement, South Africa will increase its ability to access much needed climate finance.

3. A long-term pathway beyond 2030

Our understanding is that SA intends to commit to a net-zero carbon by 2050 target, even though it has not formally done so yet. During the NPC process there was also a call for a zero carbon by 2050 target. There is also substantial evidence that 2050 is too late for either.

Despite these deliberations on how and when to fully decarbonise by, we believe that in principle, the proposed NDC should be designed to lead South Africa to be carbon neutral by 2050 at the very latest. The objective should be for South Africa to cease to be a contributor to climate change as soon as possible and this requires a long-term pathway beyond 2030.

Here it is the nature of the pathway that is important, and this is where the NDC fits in.

If we take net-zero by 2050 as an example - it would be possible to have a situation of *increased* emissions up till 2049 and a sudden cut off to net-zero in 2050. Obviously this extreme example of backloading [11] is just to illustrate the point that what is most important is not just achieving a goal like net-zero by 2050, but what the cumulative emissions by 2050 are - as this is what contributes to climate change.

Therefore, our focus is making sure that the NDC provides for a fair and ambitious emissions target per year, so that our cumulative emissions are as low as possible. However, this does mean that the process of continued emissions reduction is divorced from the end target, and that is what we feel is missing in the proposed NDC.

We suggest that the proposed NDC must give proper consideration to what happens beyond 2030. To not do this falls into the trap of short term thinking, and the NDC is meant to be the opposite.

[8] https://climateactiontracker.org/climate-target-update-tracker/south-africa/
[9] https://climateactiontracker.org/countries/south-africa/
[10] Greenpeace Africa, *Alignment of South Africa's Nationally Determined Contributions with 1.5 C global goal*. Expected to be published May 2021
[11] https://medium.com/lobbywatch/you-need-to-know-about-the-shell-game-ad1c0be32fa3

We suggest that the current range be converted to a series of upper limits that constitute a 1.5°C compatible pathway to reach carbon neutrality as soon as possible, but by 2050 at the absolute latest.

4. Action plans and just transition - how will the emissions targets be achieved?

While the NDC is primarily to set down the emissions targets, what really matters is how they are achieved, which relates to how plans and policies are implemented. It is also crucial to understand how the emission targets are going to be financed.

In terms of finance, South Africa should illustrate in the NDC what can be achieved without support and indicate what can be achieved with support in order to increase ambition. Such an approach would not be a new one, various other developing countries have taken such an approach in their INDCs in 2015.

In this context of planning and implementation, we would like to single out one plan which has the potential to have a significant impact if it is rationally updated and rolled out

The energy sector contributes the most to GHG emissions (79.1% in the latest GHG inventory[12]) and it is widely accepted that within this electricity sector reform is where the easiest gains can be made. The Integrated Resource Plan (IRP) 2019 sets out how electricity generation is currently planned to be decarbonised at utility scale.

The problem is that the IRP as it stands is not a least cost plan nor an optimal plan from an emissions perspective [13]. This is partly due to policy constraints and adjustments such as the capping of renewable energy and the inclusion of new coal fired power stations. In short, the IRP can be substantially improved - and fortunately increased decarbonisation correlates to deceased cost as renewables are now the cheapest source of utility scale electricity.

The concern we have with the proposed NDC is that it accepted the IRP 2019 as is as merely states: “Implementing the NDC will require the implementation of South Africa’s Integrated Resource Plan”. We would counter this by saying as stated above that the NDC needs to be more ambitious and call for the IRP to increase the rate of renewables uptake and increase the rate of coal decommissioning.

The IRP is not set in stone, it is intended as a “living plan” [14] that is updated every two years so it is due for revision.

We support the submission by Meridian Economics[15] that illustrates how an acceleration in electricity sector transition could actually increase access to finance though a blended climate finance transaction framework known as the Just (Energy) Transition Transaction.

---

12 https://www.environment.gov.za/sites/default/files/gazetted_notices/nemaqa_draft7greenhousegasinventoryeport_g43706gon989.pdf

13 https://researchspace.csir.co.za/dspace/bitstream/handle/10204/11200/22850_GWDMS%20279138%20CSIR-IRP2019.pdf

14 https://www.egsa.org.za/wp-content/uploads/2019/10/IRP-2019_corrected-as-gazetted-18-October-2019-No.-42784.pdf

15 https://meridianeconomics.co.za/wp-content/uploads/2021/04/NDC-Submission_Meridian-Economics.pdf

We support the statement in the proposed NDC that “just transition is at the core of implementing climate action in South Africa”. For this to materialise there is an urgent need for government to produce (in consultation with stakeholders) both national and local level just transition plans that act in unisome with instruments such as the final NDC and a revised IRP.

Conclusion

To cover our 4 sections in summary:

- DFFE should immediately make all supporting documentation available and provide another month for the public to comment on them. This could happen concurrently with a public participation process.
- The 2030 target should be between 300 Mt Co2-eq, and at maximum 350 Mt CO2-eq per year.
- To cover the period beyond 2030, the proposed NDC should have a series of upper limits that constitute a 1.5°C compatible pathway to reach carbon neutrality as soon as possible, but by 2050 at the absolute latest.
- The proposed NDC can be used to push for required improvements in plans such as the IRP.
- All emissions reduction work must fit into a just transition plan, so that the changes place social and environmental justice at the forefront.