

# Comments on South Africa's Climate Change Bill

African Climate and Development Initiative  
University of Cape Town

Dr. Britta Rennkamp on behalf of a ACDI team and associates submission

# Climate research at UCT

Climate science, climate policy in mitigation and adaptation, climate risk

Representation in the African Group of Negotiators and the South African Delegation to the UNFCCC

Observer Status to the UNFCCC

Lead authors to the IPCC in all three working groups (Climate Science, Mitigation and Vulnerability/ Adaptation)



**ARUA-CD**  
Centre of Excellence  
Climate and Development



**ACDI** African  
Climate &  
Development  
Initiative



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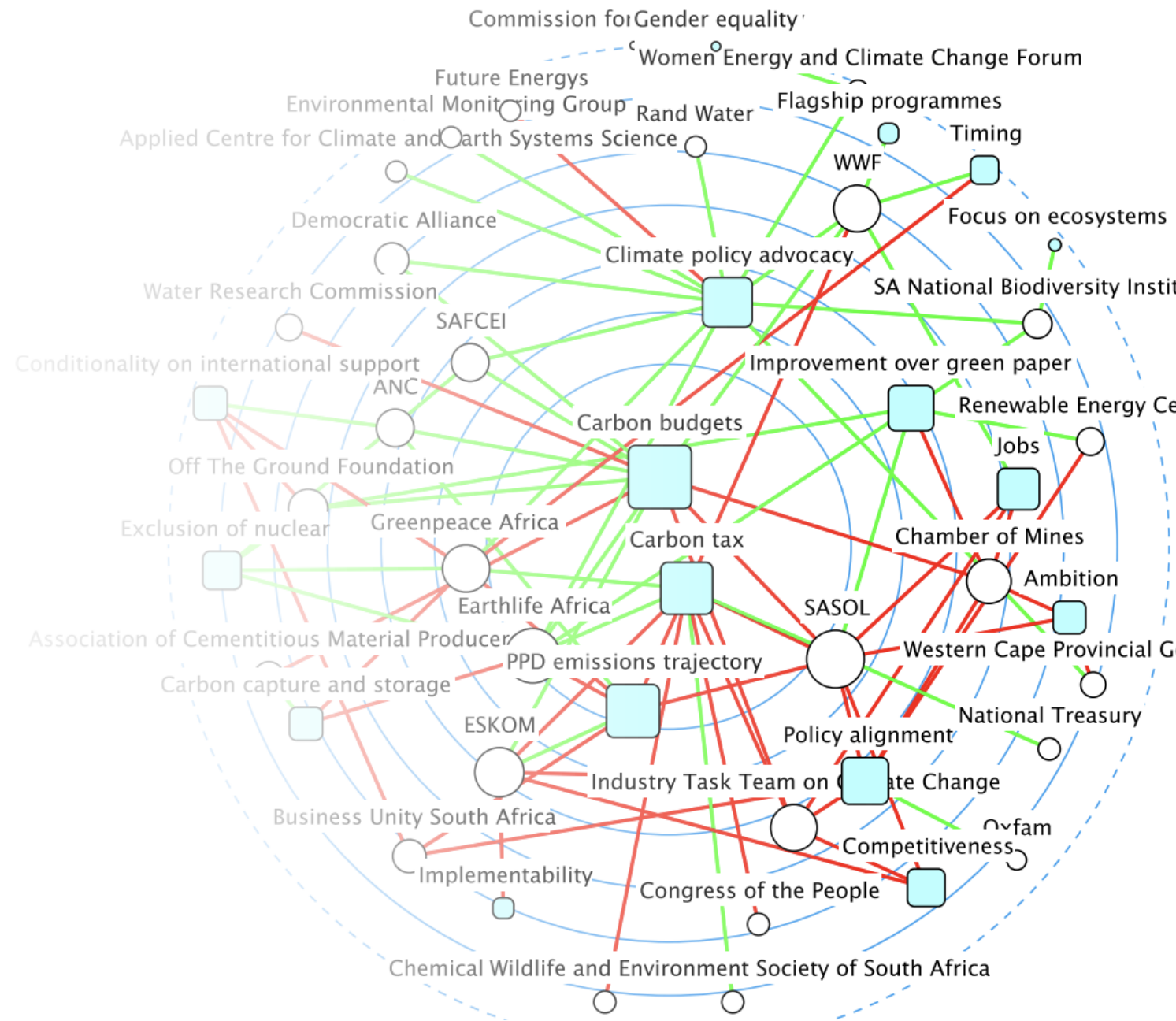


## Our submission to the Parliament

- Presentation based on written comments, submitted to Parliamentary Portfolio Committee in May 2022
- Contributions from several researchers at University of Cape Town (UCT)
- Andrew Marquard, Harald Winkler, Penny Price, Emily Tyler, Nicolas Simpson, Christopher Trisos, Britta Rennkamp (written inputs) and verbal inputs from others in UCT's African Climate and Development Initiative (ACDI)
- Available online on the ACDI web-site  
<http://www.acdi.uct.ac.za/acdi/publications> and a UCT repository  
<https://doi.org/10.25375/uct.21391077>

## Key points

- Climate Change Bill is critical to coordinate a national response
- Policy processes need to reflect the urgency of the climate crisis
- Consultation and transparency amplify legitimacy, but come with a trade off with time
- Multi-level climate governance: integration with local government (municipalities and districts)
- Constitutional right of future generations
- Aim for highest level of ambition in emission reductions – reduces need to adapt and loss and damage



2. Discourse network national climate change response policy. Actors (white circles) are connected through red lines. Blue squares represent shared issues (blue square) they share either in support or opposition of the issues in the White Paper. The size of the circles



## Highest level of ambition, equity and progression

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- National Development Plan (NDP) aims at equity
- South Africa as responsible global citizen must fulfil international obligation
- Progression: ‘must try harder’ every 5. years: each successive Nationally Determined Contribution (NDC) must reflect “highest possible ambition” and equity (Article 4.3)
- More stringent mitigation targets ...
- ... more ambitious adaptation goals, and
- Implement policies to align key policy goals
- Act = important legal basis



# Highest level of ambition, equity and progression



- National Development Plan (2011) outlines six interlinked priorities, the first of which is:
  - “Uniting all South Africans around a common programme to achieve prosperity and **equity**”
- SA’s updated Nationally Determined Contribution (NDCs) is framed by a section on
  - “Progression and highest possible ambition, in the light of equity and national circumstances”

## Textual suggestions

§1 Definitions: add “progression” (possible language is suggested in written submission, for your consideration; on this and following suggestions)

§2 – equity already included; add responsibility for Loss & Damage

§3 – include precautionary principle in 3 a; amend text on equity and CBDR in 3c; add ‘reduction of inequality’ in 3d

## Policy coordination with Nationally Determined Contribution (NDC)

- Paris Agreement and SA NDC are listed in 'definitions'
  - Need to be included in operational section
- Low-Emissions Development Strategy (LEDS)
  - Specify that LEDS provides a long-term perspective on near-term mitigation
  - Just transition to net zero CO2 emissions by 2050
- Clarify institutional roles to implement NDC – an all-of-society approach required
- Act must enable coordination across all government departments
- ... and enable reporting internationally
- Link with energy transition and JET-P

SOUTH AFRICA'S  
JUST ENERGY TRANSITION INVESTMENT PLAN  
(JET IP)

for the initial period 2023–2027

# Summary

- Institutional arrangements for international reporting and markets under Paris Agreement
- Specify further functions of Presidential Climate Commission (PCC)
- Just transition to net zero CO<sub>2</sub> emissions around 2050 (in LEDS)
- Include responsibilities for Loss & Damage
- Cross-sectoral governance and implementation
- Access to information
- Stakeholder consultation and advice

*for details on points above, including textual suggestions, see written submission <http://www.acdi.uct.ac.za/acdi/publications>*



# Climate policy networks: actors, coalitions and contestation

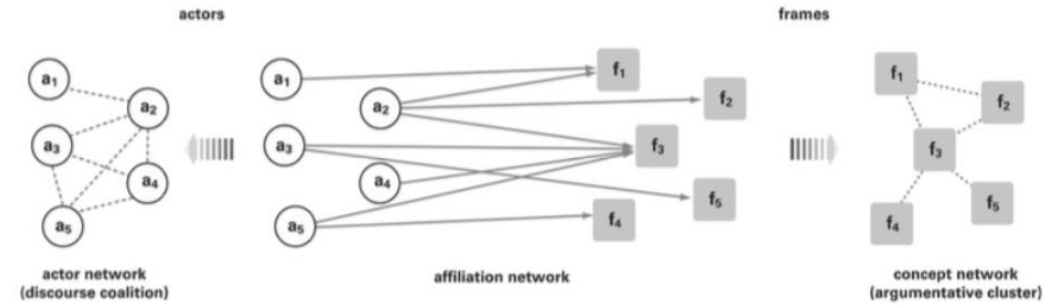
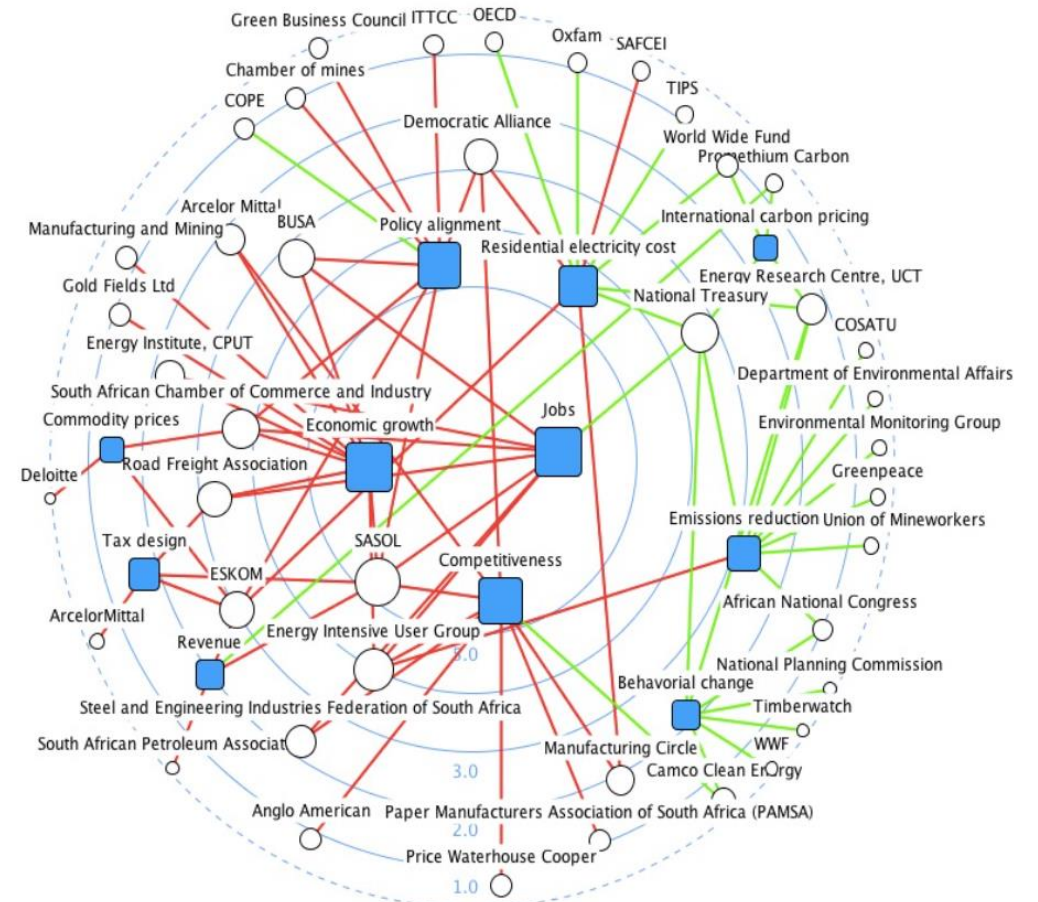


Fig. 1. Model of a discourse network. Source: own.



Many thanks for your attention

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