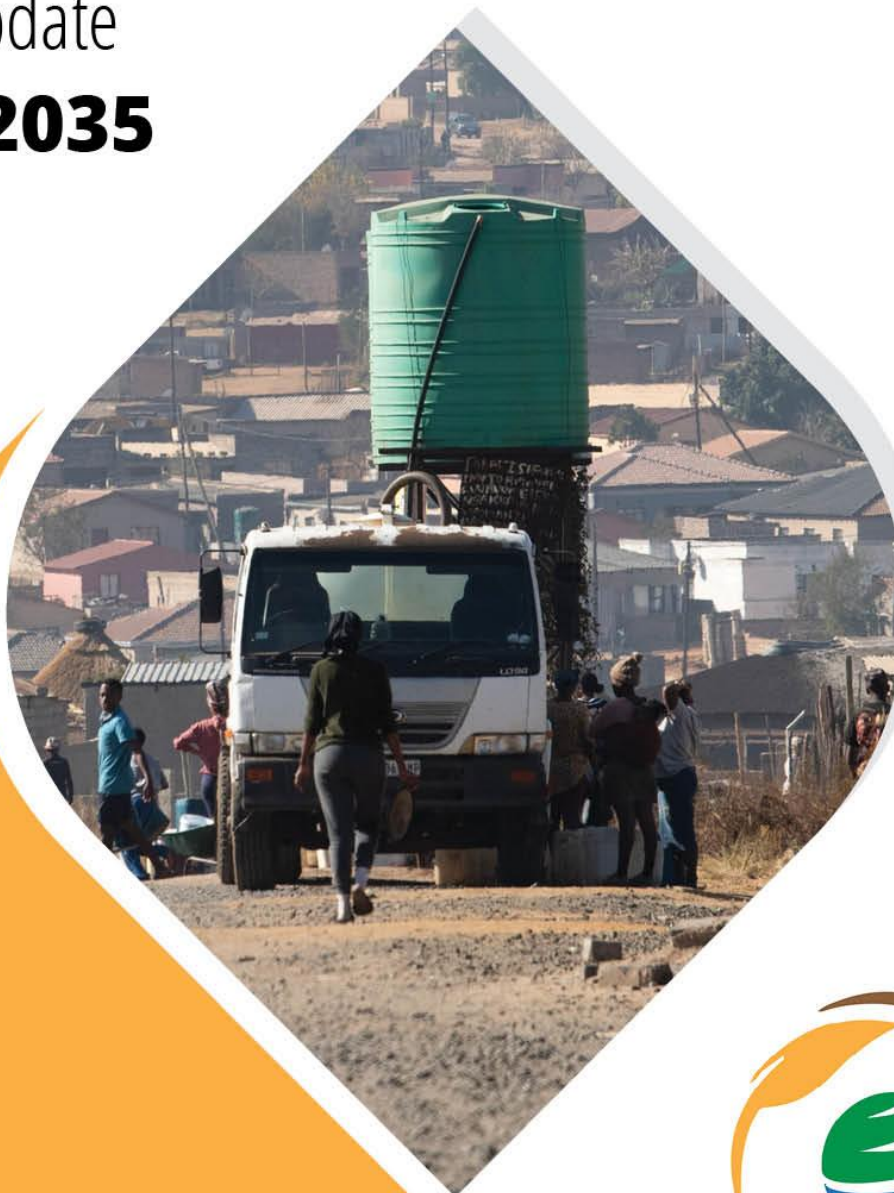


# **STAKEHOLDER** PERSPECTIVES **REPORT**

South Africa's Nationally Determined Contributions  
– NDC Update

**2030- 2035**



**PRESIDENTIAL  
CLIMATE COMMISSION**  
TOWARDS A JUST TRANSITION

# ABOUT THE PRESIDENTIAL CLIMATE COMMISSION

The Presidential Climate Commission (PCC) is an independent multi-stakeholder body established by the President of the Republic of South Africa. The PCC's mandate emanates from the Presidential Jobs Summit held in 2018, and the PCC is committed

The PCC is committed to ensuring that the transition is socially just and that the needs of vulnerable groups are addressed. The Climate Change Act sets out the functions of the PCC, which include providing advice on the Republic's climate change response and pathways to a low-carbon climate-resilient economy and society. In building this society, South Africa needs to ensure decent work for all, social inclusion, and the eradication of poverty.

## ABOUT THIS REPORT

South Africa has committed to reducing its greenhouse gas emissions and building climate resilience through its NDC, submitted under the Paris Agreement. As part of its mandate to advise on the country's climate change response, the PCC initiated a series of stakeholder engagements in 2024/2025 to support the process of updating South Africa's NDC for the period 2030–2035

This report reflects the views of South Africa's diverse stakeholders, including business, labour, civil society, youth, local government, academia, and technical experts, who participated in formal consultations, focussed roundtable discussions, and written submissions.

While not intended as a consensus document, it offers a transparent account of stakeholder perspectives on mitigation ambition, adaptation priorities, and the means of implementation. It complements the Recommendations and Technical Reports by surfacing the values, contestations, and practical considerations that must inform South Africa's updated NDC, ensuring that climate ambition is both credible and socially grounded.

This stakeholder report forms part of a compendium of three reports, which will all be published available on the PCC website

1. The Stakeholder Perspectives Report (this report), which presents the unfiltered perspectives of the stakeholders consulted in preparing the PCC recommendations on the 2030-2035 NDC update.
2. The 2030-2035 NDC Update Recommendations Report, which describes the recommendations of the PCC to the President of the Republic, the Minister of Fisheries, Forestry and Environment and Cabinet based on our research and engagement with stakeholders.
3. The Technical Report, which holds the summary of the PCC's technical research work that informed the consultations and recommendations report.

Collectively, these reports which should be read form a holistic input into South Africa's updated NDC, anchoring climate ambition in both evidence and engagement together aim to inform South Africa's strategic positioning on **adaptation**, **mitigation**, and **means of implementation** for the 2030–2035 period, providing an evidence-based and consultative foundation for advancing an equitable and a just transition.

**Where the reader may disagree with the conclusions reached in this document, or where readers feel key pieces of information have been missed, the Commission welcomes additional research and insight. Such information should be sent to [mitigation@climatecommission.org.za](mailto:mitigation@climatecommission.org.za). The Commission will investigate all recommendations and questions that are substantiated with well researched, data-driven evidence.**

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# 1. INTRODUCTION AND CONTEXT

South Africa is developing its 2030–2035 Nationally Determined Contribution (NDC) at a moment of increasing urgency, not only due to worsening physical climate risks, but also because of deepening socio-economic vulnerabilities. The updated NDC must respond to both imperatives: it must be grounded in the best available science and be fully attuned to the structural inequalities, unemployment, and poverty that climate change threatens to intensify.

At the same time, it must serve as a lever for long-term economic transformation, by aligning climate action with inclusive growth, economic diversification, and a just transition away from carbon-intensive systems. This includes addressing both **adaptation and mitigation, while ensuring that the means of implementation** are available, equitable, and targeted to where they are most needed. For the NDC to be effective, it must reflect the realities on the ground, particularly for vulnerable communities, while creating enabling conditions for investment, resilience, and shared prosperity.

The updated NDC is currently under development by the Department of Forestry, Fisheries and Environment (DFFE). As part of this process, the Presidential Climate Commission (PCC) has launched an integrated initiative that combines economic and emissions modelling, scenario analysis, and broad-based public engagement. A comprehensive stakeholder engagement and consultation process is designed to inform the NDC draft with a broad range of perspectives from South Africa's social partners.

The decision to empower and engage widely was taken to ensure that the updated NDC reflects the perspectives and guidance of all social partners and is informed by South Africa's just transition priorities. The consultations aimed to build understanding of the technical proposals under consideration, gather inputs on ambition levels, and ensure that the updated NDC is both inclusive and implementable.

Stakeholders engaged in the capacity building sessions and consultations included representatives from business, labour, civil society, youth, faith-based organisations, academia, local and national government, and community groups.

This report presents a synthesis of the perspectives gathered through a series of engagements on the 2035 NDC recommendations. It focuses on key stakeholder views regarding mitigation ambition, adaptation priorities, and the means of implementation, including finance, capacity-building, and technology. The insights and feedback captured here have directly informed the development of the PCC's recommendations to government for South Africa's updated NDC.

The structure of the report follows five main themes:

1. Methodology underpinning the stakeholder consultations
2. Key themes of convergence and divergence
3. Perspectives on mitigation, adaptation and means of implementation
4. Key perspectives from consultations

This report is not intended to represent consensus, but rather to present a reflection of the diverse inputs received from across society. It serves as a public record of the consultation process and a key input into the updated NDC decision-making process.

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## 2. METHODOLOGY UNDERTAKEN IN STAKEHOLDER ENGAGEMENTS

The stakeholder engagement process for the 2030-2035 NDC recommendations was structured to uphold the principles of transparency, inclusivity, and responsiveness. Building on the PCC's mandate to promote public participation in climate governance, a phased approach was adopted that included capacity-building sessions, formal stakeholder consultations and focussed thematic roundtable discussions

### 2.1 Sectoral Stakeholder Engagements

These stakeholder engagements, conducted from November 2024 to April 2025, comprised both capacity building and dedicated consultation sessions, as well as focused roundtable discussions. Notably, the capacity building sessions held in November 2024 laid a foundation, ensuring that stakeholders were well-prepared to contribute substantively to the discussions.

The principal aim of these engagements was to gather diverse viewpoints and feedback to inform the recommendations for the 2030-2035 NDC update, thereby enriching the dialogue around climate change and environmental governance in South Africa.

The insights captured during these sessions form the core of this report. Serving as a supporting document to the separately published Commissioner Recommendations Report, the report synthesises varied opinions and suggestions from across the spectrum of South African social partners. This approach not only underscores the collaborative intent behind the NDC drafting process but also positions it as a critical reference for informed policy making.

These engagements were carefully sequenced to first equip stakeholders with the necessary context and information, and then gather structured input to inform the technical, political, and social dimensions of the NDC. By integrating evidence-based dialogue with deliberative consultation, the process aimed to foster legitimacy, encourage ownership, and embed equity into South Africa's climate commitments. The hybrid engagements were designed with distinct objectives depending on the format. The capacity building sessions were intended to familiarise stakeholders with the NDC context, scientific underpinnings, and policy frameworks, ensuring all participants could meaningfully engage in subsequent discussions.

In contrast, the formal consultation and roundtable sessions were designed to solicit substantive inputs on the formulation of the 2035 NDC, to identify and understand the guiding principles that must underpin the contribution, and to build consensus around the key elements for the recommendations. This structure ensured that participants were both informed and empowered to contribute nuanced, grounded feedback aligned with South Africa's just transition priorities.

All stakeholder groups were well represented throughout the consultation process, ensuring a comprehensive and balanced range of perspectives. Participants included representatives from business, civil society, faith communities, youth, labour, and local government, as well as researchers and sectoral specialist and leader representatives in dedicated roundtable discussions.

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This diverse engagement provided a diverse range of insights, facilitating a more holistic and inclusive approach to shaping the recommendations for the 2035 NDC.

Most engagement, consultation and discussion sessions were conducted as hybrid sessions. The capacity building sessions ensured that all participants were thoroughly familiar with the NDC process and its scientific basis, in order to engage meaningfully with the content, while also allowing them to understand the DFFE NDC process.

These sessions also featured interactive Q&A segments, allowing stakeholders to clarify doubts and engage more deeply with the subject matter, thereby setting a strong foundation for the subsequent formal consultations.

Following the capacity building sessions, formal consultations were held using a hybrid format that allowed for both physical and virtual attendance. This approach not only maximised accessibility but also provided a robust platform for in-depth and meaningful discussions on the key topics, ensuring that all stakeholder inputs were effectively captured and integrated into the process.

**Three main questions were posed to participants during these sessions:**

1. What criteria should we follow when setting an NDC?
2. What specific actions/targets should we include in the NDCs?
3. What are you worried about with the NDCs?

**Table 1 Summary of PCC NDC Engagements with Social Partners**

Social partner	Event type	Date
<u>Civil Society</u>	Capacity Building Workshop	11 November 2024
<u>Faith</u>	Capacity Building Workshop	12 November 2024
<u>Organised Labour</u>	Capacity Building Workshop	15 November 2024
<u>Local Government</u>	Capacity Building Workshop	20 November 2024
<u>Business</u>	Capacity Building Workshop	22 November 2024
<u>Youth</u>	Capacity Building	23 November 2024
<u>Faith</u>	Formal consultation	27 February 2025
<u>Local Government</u>	Formal consultation	28 February 2025
<u>Youth</u>	Formal consultation	1 March 2025
<u>Civil Society</u>	Formal consultation	3 March 2025
<u>Business</u>	Formal consultation	4 March 2025
<u>Organised labour</u>	Formal consultation	5 March 2025
Gender Advisory Group	Formal consultation	10 March 2025
Gender Advisory Group	Formal consultation	25 April 2025
Provincial Government	Under Coalition & PCC South Africa NDC consultation	23 May 2025
Gender Advisory Group	Formal consultation	10 June 2025

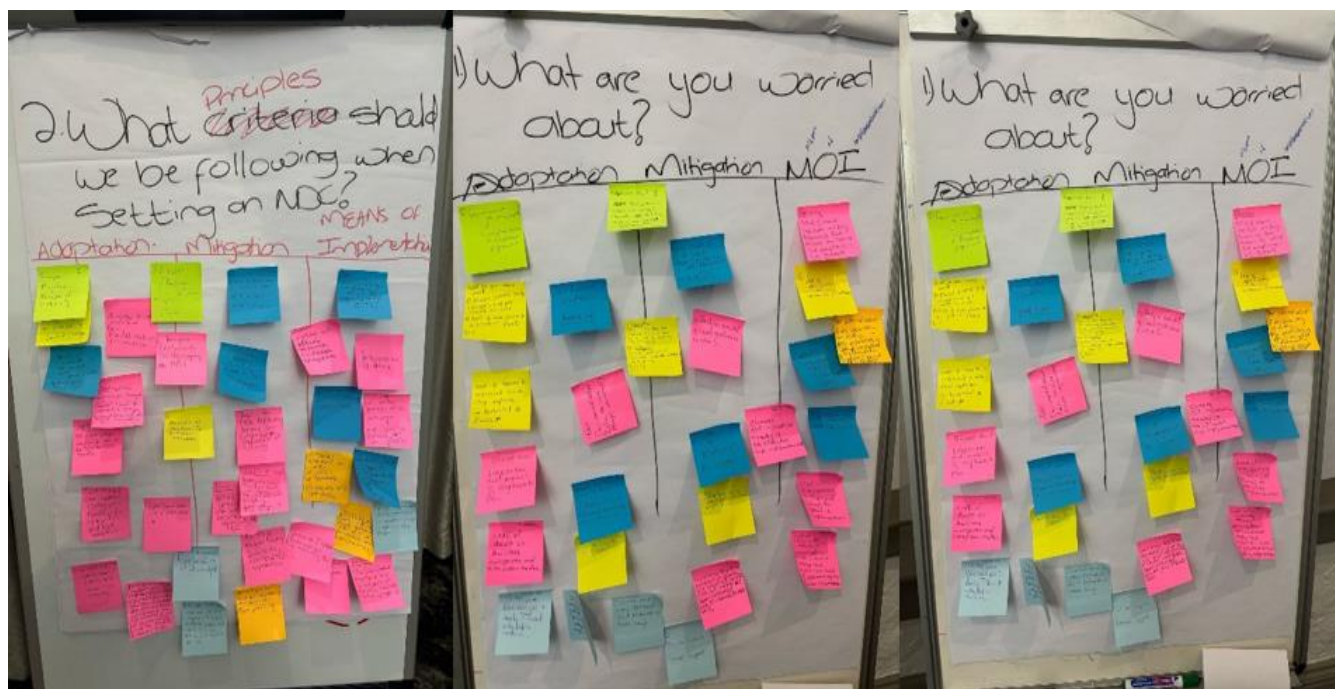


**Table 2 Summary of PCC NDC Multistakeholder Engagements**

Roundtable Discussion	<b>Means of Implementation</b>	<b>15 April 2025</b>
Roundtable Discussion	Adaptation and Resilience	16 April 2025
Roundtable Discussion	Mitigation	23 April 2025
<u><b>NDC Thematic Webinar</b></u>	Adaptation	12 June 2025
<u><b>NDC Thematic Webinar</b></u>	Mitigation	17 June 2025
<u><b>NDC Thematic Webinar</b></u>	Means of Implementation	18 June 2025

Detailed notes and recorded transcripts were maintained throughout the capacity-building and consultation sessions to ensure that nuances of the discussions were accurately captured. This process enabled taking account of stakeholder views, facilitating a thorough review of the proposed 2030-2035 NDC, and analysis of the dialogue.

In addition, in-person participants were encouraged to use Post-it notes to capture their thoughts and ideas during the consultation sessions. This method fostered real-time engagement and allowed participants to document spontaneous insights and concerns. The Post-it notes ensured even brief comments were captured for later review, contributing to a more dynamic collection of feedback.



**Figure 1: Responses of in-person attendees of stakeholder consultations**

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## 2.2 Online Participants

For those participating remotely, an online Miro board was provided as an interactive platform to share their input. This digital tool enabled remote stakeholders to contribute to real time, mirroring the interactive experience of in-person sessions. The Miro board not only facilitated the capture of diverse viewpoints but also allowed for the visual organisation of ideas, ensuring that virtual contributions were seamlessly integrated into the overall consultation process.

Stakeholder comments made during the consultations were systematically categorised across the key NDC components: Adaptation, Mitigation, and Means of Implementation. The stakeholder comments were in response to three thematic topics: criteria for developing the NDC, specific actions or targets to be included, and expressed concerns regarding the NDC. This structured approach enabled a detailed and organized analysis of the inputs, ensuring that each aspect of the discussion was appropriately considered and that the final recommendations are well-grounded in comprehensive stakeholder feedback.

## 2.3 Thematic Roundtable discussions

A series of focused roundtable discussions were also convened to elicit targeted input on key themes of the NDC, namely mitigation, adaptation, and means of implementation. The discussions were structured to complement broader stakeholder inputs and to ensure that the final recommendations are grounded in both practical implementation considerations and scientific rigour.

These roundtables brought together PCC commissioners, thought leaders, researchers, and institutional stakeholders to provide analytical and systems-level feedback, drawing on current data, planning processes, and sectoral experience.

To ensure an inclusive and comprehensive engagement process, following the above engagements, the draft 2030-2035 NDC Recommendations Report was updated, at which point the PCC facilitated and additional three targeted thematic webinars covering adaptation, mitigation, and means of implementation.

Each session began with presentations by PCC representatives and commissioners, followed by interactive discussions, allowing participants to provide detailed feedback, ask questions, and contribute insights informed by their professional and lived experiences. These thematic webinars offered stakeholders from diverse sectors, including civil society, industry, academia, local government, and community-based organizations, the opportunity to engage directly with the draft NDC recommendations.

The insights gained from these interactions were captured and integrated into this Stakeholder Perspectives Report.

## 2.4 Written Submissions

The PCC invited stakeholders to submit written comments on the draft NDC recommendations during a formal public commenting period. Stakeholders had a 19-day window to provide detailed responses, enabling deeper reflection and thorough analysis. Written submissions were received from a wide array of stakeholders, including



businesses, industry associations, civil society organisations, non-profit organisations, financial institutions, and academia.

These submissions offered substantial insights, detailed technical analyses, and specific recommendations, enriching the PCC's understanding and providing valuable inputs to refine and strengthen the final recommendations. Table 2 below provides a full schedule of these.

**Table 2: Written Submissions to the PCC on the 2030-2035 NDC Update**

SUBMITTING ORGANISATION	FORMAT OF THE WRITTEN COMMENTS	SOCIAL PARTNER
Institute of Climate Change Communication	PDF Submission (20 July 2025) - ICCC	Civil Society
Humane World for Animals South Africa	PDF Submission (18 July 2025) - HWSA	Civil Society
SALGA	PDF Submission (17 July 2025) - SALGA	Local Government
BUSA	PDF Submission (11 July 2025) - BUSA	Business
NUMSA	PDF Submission (07 July 2025) - NUMSA	Organised Labour
AgriSA	Word Document (07 July 2025) – AgriSA submission	Agriculture
University of Cape Town	Email Request for Extension (25 June 2025) – University of Cape Town Word Document submission (3 July 2025)	Academia
City of Cape Town	PDF Submission (24 June 2025) –Comments on Draft Recommendations for South Africa's 2030-2035 NDC Update	Local Government
Alliance for Climate Action (ACA-SA)	Word Document (23 June 2025) – ACA-SA Advocacy for NDC	Business
Banking Association South Africa (BASA)	PDF Submission (23 June 2025) – BASA Submission	Business
Centre for Environmental Rights (Life After Coal)	PDF Submission (23 June 2025) – CER Comments on PCC Draft Recommendation	Civil Society
Energy Council of South Africa	Email Response (13 June 2025) – Request for Extension PDF Submission (28 June 2025)	Industry Association
Eskom	PDF Submission (22 June 2025) – Eskom Input to PCC NDC Recommendations	Business
FANRPAN	PDF Submission (23 June 2025) – FANRPAN PPC Draft Recommendations for 2025 NDC Update	Civil Society
Food Forward SA	PDF Submission (21 June 2025) – Food Forward SA's NDC Submission to the NCC	Civil Society
Green Connection	Letter (23 June 2025) – The Green Connection Endorsement Letter	Civil Society
Greenpeace Africa	Word Document (23 June 2025) – Greenpeace Africa Comments on the Draft NDC	Civil Society
groundWork	PDF Submission (23 June 2025) – groundWork Waste Sector Submission	Civil Society
Indalo Inclusive South Africa NPC	Position Paper (June 2025) – Indalo Inclusive NDC Position Paper	Civil Society
International Labour Organization (ILO)	Email Response (16 June 2025) – ILO Detailed Comments on PCC Draft Recommendations	Multilateral Organisation

SUBMITTING ORGANISATION	FORMAT OF THE WRITTEN COMMENTS	SOCIAL PARTNER
Just Share	PDF Submission (June 2025) – Just Share Comments on PCC Draft NDC Recommendations	Civil Society
Environmental Impact Management Services (EIMS)	Email Response (6 June 2025) – Comments on IRP Alignment and Policy Clarity	Business
M Investments Corporation	Email Response (13 June 2025) – Comments on Industrial Decarbonisation and Finance Alignment	Business
National Union of Metalworkers of South Africa (NUMSA)	Letter (23 June 2025) – NUMSA General Secretary Letter	Labour
Sacha Knox – Feminist Economist (PCC Gender Advisory Working Group)	Email Response (10 June 2025) – Comments on Gender Integration in Mitigation	Gender
Sasol	PDF Submission (23 June 2025) – Sasol Response on PCC Draft Recommendations for SA NDC	Business
Sasol	Email Response (12 June 2025) – Sasol Request for Transparency and Extension	Business
VICDO (Visually Impaired Community Development Organisation)	PDF Submission (23 June 2025) – VICDO Recommendations to NDC Update 2030 to 2035	Civil Society

### 3. KEY MESSAGES

This report should be read in conjunction with the PCC's Technical Report, which sets out strategic and scientific recommendations for the NDC. While the Technical Report is grounded in modelling, emissions scenarios, and policy alignment, the Stakeholder Perspectives Report reflects the diverging and converging viewpoints, tensions, and lived realities surfaced during the national engagement process.

A recurring theme across all groups was the concept of a just transition and the need for an inclusive economy that will reduce the triple challenges of inequality, unemployment and poverty. Although stakeholders introduced the topic in various ways, there was unanimous agreement that the shift to a low-emissions economy must not trigger widespread economic or job losses. Accordingly, the implementation of the NDC should adhere to the principles outlined in the Just Transition Framework and the National Development Plan.

Stakeholders concurred that the NDC must be both ambitious and credible, underpinned by a clear, science-based roadmap, particularly reflecting well below 2°C and 1.5°C pathways. Labour representatives, in particular, emphasised that the NDC must safeguard livelihoods by supporting economic diversification and a just transition for workers in vulnerable sectors.

This plan should integrate robust adaptation and mitigation measures alongside transparent monitoring frameworks. Moreover, there is a strong call for an inclusive, locally driven process that ensures the voices of diverse groups, especially vulnerable communities, are not only heard but also effectively addressed.

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The key messages presented here are the result of an analysis and synthesis across diverse stakeholder groups, including business, civil society, youth, faith, labour, and local government. Both areas of consensus and divergence have been captured to provide a balanced foundation for the subsequent discussions in this report.

### **3.1. CROSS-CUTTING ISSUES RAISED BY STAKEHOLDERS**

Cross-cutting climate issues raised by stakeholders refer to concerns that span across mitigation, adaptation, and means of implementation, such as equity, governance, finance, data transparency, and institutional capacity. Stakeholders held common views with regards to the following thematic areas.

#### **3.1.1. Procedural justice and inclusivity**

Stakeholders broadly agreed that a just transition must be inclusive, participatory, and grounded in local realities. Civil society, youth, faith, and labour groups called for co-designed climate responses that prioritise engagement with vulnerable and historically marginalised groups.

Local government representatives echoed these calls, stressing that municipalities must be properly included in climate governance structures. Procedural justice was consistently identified as a prerequisite for legitimacy, with many urging that future consultations improve access for under-resourced communities, rural areas, and informal workers.

Faith-based stakeholders framed inclusion as a moral obligation, advocating for culturally sensitive and values-based climate education. Youth demanded structural changes to ensure representation in all stages of NDC planning and implementation, not merely as a token presence. The gender advisory group warned that procedural exclusion remains a barrier for women, particularly those without digital access or financial support.

Transparency and data-driven decision-making were often remarked upon. Stakeholders across business, labour, civil society, and youth agreed that data transparency and real-time monitoring are essential for effective implementation and accountability. They called for public reporting platforms and plain-language communication of progress, supported by accessible data systems. Labour and civil society in particular stressed that transparency builds public trust and ensures corrective action when targets are not met.

#### **3.1.2. Gender perspectives**

Gender equality was repeatedly cited as a core dimension of climate justice. The gender advisory working group emphasised that women—especially those in the informal economy, rural areas, and caregiving roles—face disproportionate burdens from climate impacts and often lack access to decision-making spaces. They noted the

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absence of gender-disaggregated data in the current NDC and called for indicators that measure time burdens, access to land, and participation in climate finance.

Participants stressed that gender-responsive implementation must go beyond vulnerability framing to recognise women's leadership, innovation, and enterprise in climate action. Proposals included quotas for women-led projects in mitigation sectors (e.g., energy, transport), support for women in STEM and green industries, and dedicated finance for women's cooperatives. Across stakeholder groups, there was consensus that climate policy must incorporate gender budgeting and ensure transparency in how funds reach women at the local level.

### **3.1.3. Inter-generational equity and youth views**

Youth stakeholders foregrounded intergenerational justice as a non-negotiable principle. They asserted that today's decisions must not compromise the future of young people, especially in relation to education, employment, and climate resilience. Young participants criticised the lack of meaningful inclusion in climate decision-making, citing examples where youth were consulted only symbolically or after major plans had been finalised.

Youth voices called for integration into national and local climate governance bodies and highlighted education reform, capacity building, and direct access to climate finance as priorities. They proposed mechanisms for youth oversight in NDC implementation, such as participatory monitoring and evaluation (M&E) structures, youth innovation hubs, and support for green entrepreneurship. Additionally, they urged that adaptation planning include provisions for mental health, safety in extreme events, and continuity in education.

### **3.1.4. Role of sub-national government**

Local government stakeholders emphasised that municipalities are on the front lines of climate implementation but face substantial barriers, including unfunded mandates, misaligned policies, and capacity gaps. They called for formal recognition of their role in both mitigation and adaptation, with specific targets and resources allocated through national frameworks.

Participants advocated for municipal access to climate finance, streamlined application processes for national and international funds, and training in emissions tracking and project preparation as an appreciation that without empowering local government, NDC targets will not be realised. Civil society and youth participants reinforced that meaningful local engagement depends on equipping municipalities with the authority, budget, and tools to drive inclusive climate action.

### **3.1.5. Alignment with national frameworks**

Stakeholder groups including local government, business, and civil society stressed the need to ensure that there is sufficient alignment of the updated NDC with the various national policy frameworks such as the Integrated Resource Plan (IRP), National

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Development Plan (NDP), Sectoral Emissions Targets (SETs), and the provisions of the Climate Change Act.

This alignment was seen as critical for ensuring coherence across governance levels and avoiding fragmented implementation. Stakeholders highlighted the importance of alignment across all spheres of government and called for common messaging to promote consistent interpretation, communication, and implementation of climate goals.

### **3.1.6. Indigenous knowledge and traditional leaders**

Civil society and faith participants highlighted the need to embed local practices and cultural heritage into climate planning, warning that current top-down approaches often overlook these assets. They further emphasised the value of Indigenous knowledge systems and the role of traditional leaders in advancing adaptation and resilience.

Youth and gender representatives also advocated for recognition of Indigenous women's knowledge, particularly in water management, seed preservation, and community healing practices. Faith-based stakeholders stressed the importance of moral authority and stewardship held by traditional leaders, calling for structured engagement channels that elevate these perspectives in national dialogues.

Across all groups, there was a call for the NDC to support co-designed solutions rooted in place-based knowledge and ensure that traditional authorities are part of ongoing climate governance forums.

### **3.1.7. Economic and employment considerations**

Stakeholders from labour, local government, and business agreed that job creation, skills development, and decent work must be central to all aspects of NDC implementation. They also emphasised the need for clear codes of good practice on the just transition to guide and manage the social and economic impacts of decarbonisation, ensuring fairness, accountability, and consistency across sectors.

This includes ensuring that climate projects promote local employment, support SMMEs and informal workers, and avoid deepening economic inequality. Youth groups added that climate education should be tied directly to employment pathways in green industries.

Stakeholders from focused roundtable discussions echoed and deepened many of the themes raised by social partners, particularly around the systemic nature of climate risks, the integration of adaptation into infrastructure and spatial planning, and the need for credible, transparent implementation systems. They underscored the importance of regional adaptation indicators, data custodianship, and real-time monitoring mechanisms to track delivery.

### **3.1.8. Adaptation ambition through structural transformation**

Stakeholders from focused roundtable discussions reinforced the need to define adaptation ambition in terms of structural transformation, embed adaptation in



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strategic infrastructure and coastal planning, and elevate implementation credibility through real-time data, disaggregated indicators, and stronger accountability systems.

Participants also highlighted gaps in theoretical framing and cautioned against policy weaknesses, urging ambitious innovation and national ownership in the updated NDC. Several stakeholders, including civil society, youth, and faith communities, noted that adaptation requires focussed policy and finance support due to increasing climate risks. Business and some local government representatives emphasised the need to embed adaptation into economic and planning systems rather than framing it as a standalone agenda.

The visibility and resourcing of adaptation interventions were emphasized and called for. Representatives from vulnerable communities noted that current efforts remain largely intangible or technocratic. A call was made to make adaptation tangible, via public employment, ecosystem restoration, and service delivery improvements.

The stakeholders strongly suggested that the NDC must elevate adaptation as a national priority, ensure targeted funding, and promote implementation models that are both systemic and community driven.

## **3.2. AREAS OF DIVERGENCE**

While there was broad support for an ambitious, just, and implementable NDC, the consultations also revealed several areas of substantive divergence. These differences reflect the varied mandates, capacities, risk perceptions, and values of stakeholder groups. Rather than being a weakness, these tensions highlight where further dialogue, piloting, or tailored solutions may be necessary to achieve a balanced and durable national climate response.

### **3.2.1. Level of ambition and implementation feasibility**

Stakeholders diverged on how ambitious the NDC should be, particularly in relation to the speed of decarbonisation and interim targets. Several stakeholders, particularly from labour and local government, warned that overly ambitious NDC targets risk triggering job losses, especially in vulnerable regions, and could exacerbate socio-economic inequality if not paired with clear mitigation support measures.

They stressed the need for the NDC to incorporate safeguards for affected workers and communities, including skills development and regional transition support. Labour stakeholders also cautioned that international geopolitical dynamics such as shifting global trade, energy security concerns, and foreign policy pressures could limit domestic implementation efforts and should be considered in NDC planning.

Youth, civil society, and faith actors pushed for urgent and deep emissions cuts, including a fossil fuel phase-out and full electricity decarbonisation prior to 2050. Labour and business, however, urged caution against overcommitting without delivery plans or fiscal safety nets.

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While all groups supported measurable goals, there was disagreement over timelines and feasibility, especially given Eskom's operational limitations and broader infrastructure constraints.

Stakeholders from focused roundtable discussions also cautioned that ambition must be grounded in science and feasibility. They supported the use of national carbon budgets and scenario modelling to inform targets and emphasised that setting unachievable goals could undermine policy credibility. They highlighted the need for disaggregated emissions and removals planning to avoid unintended overshooting.

This divergence underscores the need to balance ambition with delivery readiness, ensuring high-level targets are backed by sectoral roadmaps, fiscal planning, and social protections.

### **3.2.2. Financing structures and instruments**

Divergent views were expressed. Civil society, labour, and the gender advisory group favoured grants and public finance to protect vulnerable groups from indebtedness. In contrast, business supported blended finance, private capital mobilisation, and market-based approaches with concerns regarding the efficiency of grants and public finance.

In addition, local government, youth, and civil society advocated for direct access to finance at the municipal or community level. National actors leaned toward centralised mechanisms for coordination and oversight.

These differences indicate a need for a multi-channel finance architecture that protects fiscal sovereignty, enables local access, and mobilises private sector engagement—tailored to context and risk profiles.

### **3.2.3. Governance models: top-down vs. bottom-up**

Stakeholders diverged on how implementation responsibilities should be distributed. Some actors, particularly from national departments and business, emphasised the need for strong government-led implementation, in the form of regulatory control and national coordination.

Others—including faith groups, youth, civil society, and traditional leaders—called for decentralised, participatory delivery grounded in local knowledge, co-design, and inclusion.

This divergence points to the importance of multi-scalar governance models, with structured participatory platforms and clear mandates at all levels.

### **3.2.4. Carbon pricing and market-based mechanisms**

While business and some youth groups supported carbon pricing as a tool to drive investment and behavioural change, civil society, labour, and gender stakeholders expressed concern that poorly designed mechanisms could exacerbate energy poverty or cost of living. In addition, concerns were raised that carbon market-based approaches might delay transformative structural change, especially in the energy and industrial sectors.

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This divergence suggests that any future pricing mechanisms must be designed with strong equity safeguards, public oversight, and complementary social protection measures.

### **3.2.5. Role of transitional technologies**

Views differed on the inclusion of transitional or controversial technologies such as natural gas and nuclear energy. Some youth and business stakeholders viewed it as a necessary bridge fuel; others warned it could lock in carbon-intensive infrastructure.

Business and some youth groups endorsed it as part of a reliable baseload mix, while civil society and faith stakeholders opposed it on grounds of safety, waste management, and justice.

This divergence highlights the need for transparent technology assessments, lifecycle costing, and alignment with just transition principles before including such technologies in long-term planning.

### **3.2.6. Sectoral support and legacy industries**

Stakeholders were split on whether high-emitting sectors (like coal and heavy industry) should continue to receive transitional support. Some labour and business groups advocated for managed transitions to protect jobs and competitiveness.

Civil society and youth called for immediate divestment and reinvestment in renewable, low-carbon alternatives.

This difference reinforces the importance of sector-specific just transition plans, developed in partnership with workers, communities, and investors.

These divergences do not represent deadlocks but rather areas requiring deeper policy deliberation, participatory design, and tailored implementation pathways. The NDC must accommodate South Africa's complex development context and enable co-existence of different approaches—united by a common purpose of equity, ambition, and climate resilience.

## **4. THEMATIC ANALYSIS OF STAKEHOLDER PERSPECTIVES**

Stakeholders were encouraged to provide comments on three overarching themes:

1. What criteria should be followed in developing the NDC?
2. What specific actions/targets should be included in the NDC?
3. What are you worried about regarding the NDC?

Within these themes, stakeholders were requested to provide input into aspects relating to adaptation, mitigation and means of implementation. This structure allows for a clearer understanding of the specific expectations, proposals, and concerns raised by different stakeholder groups across each element of the NDC framework.

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## 4.1. Mitigation

Stakeholder feedback on the mitigation component of the NDC update reflects both shared priorities and areas of divergence, structured here under sectoral targets, carbon budgets, and broader views on ambition and feasibility.

### 4.1.1. Sectoral targets

Stakeholders from business and industry highlighted challenges around linear emission reductions, particularly for high-emission facilities, advocating instead for phased decarbonisation informed by technological feasibility, socio-economic conditions, and sectoral realities.

They proposed structured, incentive-based policy frameworks to enable industry transition without destabilising economic growth and employment. Clear alignment and coherence with policy instruments such as the Integrated Resource Pla, sectoral emission target), and carbon budgets were emphasized to reduce policy uncertainty and maintain economic competitiveness.

Stakeholders from across sectors expressed support for sector-specific mitigation targets to ensure transparency and accountability.

- 1) Energy: Business stakeholders called for clear renewable energy targets, suggesting an annual build of 6–7 GW, alongside a tripling of energy efficiency. Civil society, youth, and faith groups called for full decarbonisation of the electricity system by 2040, while labour called for a phased transition aligned with job creation and protection. Local government urged support for distributed energy solutions, municipal wheeling, and resilient grid infrastructure.
- 2) Stakeholders from civil society and community-based organisations emphasized the importance of explicitly addressing climate-induced migration and displacement within adaptation plans. It was noted that regional droughts have already led to significant population movements, necessitating robust policy measures to manage internal and cross-border climate refugees effectively.
- 3) Transport: Youth and civil society advocated for a shift to electric public transport systems, prioritising non-motorised mobility and access for underserved communities. Labour recommended investments in local manufacturing for electric vehicles and public transit infrastructure to create decent jobs.
- 4) Industry: Business supported sector-specific targets, with a focus on heavy-emitting sectors such as steel, cement, and mining. Labour stressed the need for mitigation pathways to be integrated into industrial policy, ensuring localisation and competitiveness. Civil society called for polluting industries to face stricter emissions regulations and for the phase-out of coal-intensive production. Labour and youth stakeholders emphasised that each high-emitting sector must be supported by a specific just transition roadmap, including employment transitions, community buffers, and retraining pathways for workers in vulnerable regions.
- 5) Waste: Feedback from community organisations and NGOs strongly advocated including mandatory climate measures and explicit emission-reduction targets for the waste sector, emphasizing that waste management presents significant opportunities for rapid mitigation action and local job creation, particularly

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benefiting waste pickers and workers through decentralized organic waste processing.

#### **4.1.2. Carbon budgets and emissions pathways**

There was widespread support for enforceable carbon budgets and interim milestones to hold all actors accountable. Civil society and youth groups demanded that the NDC align with a 1.5°C-compatible trajectory, with carbon budgets allocated per sector and enforced through legislation. Labour emphasised that such budgets must be fair and consider socio-economic realities, including job protection.

Business stakeholders called for predictability and transparency in how budgets are set, to guide investment decisions and avoid regulatory uncertainty. Local government requested alignment with emissions tracking tools at the municipal level and technical support to fulfil new monitoring requirements.

Some civil society and faith-based actors also raised the need for a just and equitable allocation of emissions space, ensuring that historical responsibilities and present capacities are taken into account.

Youth, labour, and civil society groups repeatedly cautioned that without enforceable tracking systems, public data access, and mechanisms for holding both government and private actors accountable, the NDC risks remaining a “paper ambition.” Stakeholders urged the creation of transparent monitoring structures and civil society oversight mechanisms to ensure effective delivery.

Stakeholders from focused roundtable discussions reiterated the importance of using a transparent national carbon budget to frame the updated NDC. They stressed that South Africa's 2035 target should be coherently linked to its fair share of the global budget and noted the risk of failing to distinguish between gross emissions and removals, which could lead to underestimating required action.

#### **4.1.3. Views on ambition, feasibility, and timelines**

Stakeholders expressed differing views on the appropriate level of ambition:

- 1) Civil society, faith, and youth groups pushed for urgent action, with higher ambition to reflect climate justice and equity. They argued that delayed action would burden future generations and increase climate-related harm, especially to vulnerable communities.
- 2) Labour called for ambition to be accompanied by credible implementation plans, social protection measures, and job transition pathways. They cautioned against high-level targets that lack delivery mechanisms.
- 3) Business emphasised the need for feasible, cost-effective implementation, underpinned by enabling regulation and infrastructure. They raised concerns about overambitious commitments without adequate financing and system readiness.
- 4) Local government stakeholders supported increased ambition but warned that subnational capacity, especially in smaller municipalities, needs to be strengthened to ensure implementation on the ground.



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Stakeholders from focused roundtable discussions highlighted the risk that mitigation strategies if not spatially and socially integrated, may unintentionally undermine adaptation and resilience goals. For example, the economic impacts of EV transitions on the auto sector or fisheries decline from ecosystem shifts require mitigation pathways to be designed with broader systems implications in mind. They also urged stronger integration of mitigation with spatial planning tools to avoid carbon lock-in and support holistic development.

Across all groups, there was agreement that ambition should be science-aligned and realistic, with measurable interim goals and public reporting mechanisms. There was also strong support for ensuring that ambition does not compromise livelihoods, energy access, or developmental priorities, particularly for historically disadvantaged groups.

Stakeholders diverged on several proposed mitigation tools. Business and some youth groups supported the use of carbon pricing mechanisms to drive behavioural change and innovation. However, civil society, labour and the gender working group expressed concerns around carbon markets, with the view that poorly designed pricing systems could increase energy poverty or cost of living. Likewise, some youth stakeholders supported nuclear energy as a low-emissions source, while civil society and faith-based groups opposed it, citing concerns over long-term safety, waste management, and alignment with just transition principles.

In addition to perspectives from formal stakeholder groups, stakeholders from focused roundtable discussions provided additional technical insights. These included calls to anchor the 2035 target in a defined national carbon budget of 9–10 GtCO<sub>2</sub>e, and to differentiate conditional from unconditional targets based on access to finance and technology, and to model alternative trajectories aligned with both 2°C and well-below-2°C pathways. Participants also stressed the importance of aligning sectoral mitigation targets with national plans such as the IRP, JET-IP, and industrial policy frameworks, cautioning against over-reliance on non-binding instruments like the SETs.

On removals and emerging technologies, Participants urged caution in depending too heavily on early-stage options like Carbon Capture and Storage, and green hydrogen, though they acknowledged the socio-economic potential of the latter. They also called for a stronger recognition of mitigation co-benefits arising from adaptation and land-sector actions. These contributions complement and reinforce many of the views expressed by other stakeholder groups.

This section captures both the shared vision and points of tension around South Africa's mitigation strategy, offering a platform for convergence and further dialogue in the NDC refinement process.

## **4.2. Adaptation**

Stakeholders were united in recognising that adaptation is urgent, deeply local in nature, and fundamental to achieving a just transition. They stressed that adaptation should not be treated as an afterthought to mitigation, but rather as a central pillar of the 2035 NDC.

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Participants representing municipal governance and public sector stakeholders recommended practicalizing national adaptation frameworks at the local government level, utilizing integrated planning mechanisms such as the District Development Model. They highlighted the necessity of clearly identifying community adaptation needs, fostering inclusive participatory processes before implementation, and ensuring adequate financing mechanisms at local and municipal levels.

Civil society organisations, environmental NGOs, and community representatives stressed urgent action in strengthening adaptive capacity, particularly emphasizing enhanced governance frameworks and more rigorous local-level implementation. There was significant support for adopting measurable adaptation outcomes, spatially resolved vulnerability assessments, and explicit inclusion of ecosystem restoration and nature-based solutions. Additionally, stakeholders raised the critical need for addressing climate-induced migration proactively within national and local planning frameworks.

Youth stakeholders, in both the capacity building and consultation sessions, specifically advocated for strengthening the economic development of rural communities. They emphasised that doing so would reduce rates of urban migration, alleviate pressure on urban infrastructure and services, and improve the quality of life in rural areas from both a resilience and equity perspective.

Balancing ambition with feasibility was a common theme among many stakeholders. Business and labour urged that ambition must be matched by credible delivery mechanisms and realistic planning horizons. Youth and civil society, while calling for bold action, acknowledged the risk of overpromising without sufficient institutional capacity. There was consensus that ambition should be grounded in implementation feasibility and inclusive design.

Stakeholders from focused roundtable discussions noted that implementation challenges in South Africa are compounded by fragmented institutional mandates, a lack of sustained delivery capacity, and crisis-driven policy responses. They argued that without a clear, shared national vision and long-term implementation architecture, climate action risks becoming reactive and short-term. Several contributors proposed that the NDC process include a full review of the 2021 cycle's delivery experience to identify systemic constraints and inform more structured, future-oriented execution pathways. There was consensus that ambition must be grounded in implementability, trust, and institutional clarity.

Feedback from civil society, local government, labour, youth, faith-based organisations, business, and the gender advisory group highlighted the importance of embedding equity, participation, and resilience across all adaptation actions.

#### **4.2.1. Sectoral priorities**

This section synthesises perspectives under four thematic categories: sectoral priorities, equity and vulnerable groups, alignment with local resilience planning, and divergences in stakeholder views.

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Stakeholders proposed a wide range of adaptation interventions across sectors most vulnerable to climate impacts:

- 1) Water, health, food systems, and disaster risk were repeatedly identified as high-priority sectors. Local government and civil society urged large-scale investments in flood defences, drought-proof water infrastructure, and climate-smart agriculture to strengthen long-term resilience.
- 2) Public health systems must be climate-proofed, according to youth and civil society groups, with emphasis on maintaining essential services during climate shocks, addressing mental health, and supporting vulnerable groups like the elderly.
- 3) Food security was a recurring concern, with youth and rural representatives promoting climate-smart agriculture, efficient irrigation, and support for smallholder and women farmers.
- 4) Nature-based and ecosystem-based adaptation approaches—such as wetland restoration, urban greening, and reforestation—were highlighted by youth, civil society, and labour as measures that also generate jobs and biodiversity benefits.
- 5) Stakeholders from focused roundtable discussions emphasised the urgency of integrating adaptation into long-term national infrastructure and regional spatial planning. They cited Gauteng's Day Zero risk and the Lesotho Highlands Phase 2 project as examples of infrastructure where resilience planning must be embedded. They also recommended that the NDC address coastal migration trends, proposing ecosystems-based adaptation solutions such as mangrove restoration and ecosystem protection to reduce flooding and sustain coastal livelihoods.
- 6) Community-led pilots, including the concept of "green villages" that integrate renewable energy, sustainable housing, food production, and ecosystem protection, were widely supported as replicable models for locally driven resilience (particularly by youth and civil society).

#### **4.2.2. Equity and vulnerable groups**

Stakeholders representing non-profit organisations and advocacy groups for marginalized communities strongly emphasized the necessity of inclusive adaptation strategies. They underscored the urgent need for integrating tailored accessibility measures, particularly for persons with disabilities, including sensory-adapted early warning systems and improved disaster response infrastructure. The importance of intersectionality was highlighted, calling for policies explicitly designed to support vulnerable groups disproportionately impacted by climate events—especially women, persons with disabilities, and economically disadvantaged communities. Stakeholders also advocated for strengthened municipal capacity and dedicated financial resources to enable genuinely inclusive climate action.

There was broad agreement that adaptation measures must be designed with and for the most vulnerable, recognising their agency, rights, and role in implementation:

- 1) Women, children, the elderly, persons with disabilities, and informal workers were identified as priority constituencies. The gender advisory group called for adaptation

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measures that reduce care burdens (e.g. access to water and energy) and explicitly address gender inequalities.

- 2) Gender-disaggregated indicators and gender-responsive budgeting were recommended to ensure accountability in delivering inclusive adaptation.
- 3) Faith groups called for climate responses rooted in spiritual, cultural, and moral values, including care, solidarity, and stewardship. They emphasised that adaptation planning must recognise diverse forms of knowledge and lived experience, particularly in marginalised communities.
- 4) Labour groups urged adaptation to be connected to decent work creation, advocating for public employment programmes focused on building resilience infrastructure, such as stormwater systems, sustainable housing, and health services.
- 5) Youth stakeholders emphasised that child rights governance must be central to adaptation, and that interventions must safeguard essential services like housing, sanitation, and transport in vulnerable communities.

#### **4.2.3. Alignment with local climate resilience plans**

Stakeholders from civil society and community-based organisations emphasized the importance of explicitly addressing climate-induced migration and displacement within adaptation plans. It was noted that regional droughts have already led to significant population movements, necessitating robust policy measures to manage internal and cross-border climate refugees effectively.

Participants representing municipal governance and public sector stakeholders recommended practicalizing national adaptation frameworks at the local government level, utilizing integrated planning mechanisms such as the District Development Model. They highlighted the necessity of clearly identifying community adaptation needs, fostering inclusive participatory processes before implementation, and ensuring adequate financing mechanisms at local and municipal levels.

There was strong consensus that national adaptation goals must be grounded in local realities and embedded in development planning frameworks:

- 1) Integration into local and national planning instruments such as IDPs, SDBIPs, spatial development frameworks, and the National Development Plan (NDP) was seen as essential by business, local government, and labour groups.
- 2) Local government representatives stressed the need for formalised adaptation mandates, supported by ringfenced finance, technical assistance, and measurable outcomes.
- 3) Stakeholders from focused roundtable discussions called for the centralisation of adaptation-related data in a publicly accessible national portal, citing current fragmentation and limited access to regional indicators. They proposed drawing on existing SDG metrics, StatsSA data systems, and the TEEB framework to build quantitative, spatially disaggregated indicators that can guide planning at municipal and provincial levels. They also stressed the need for adaptation monitoring systems aligned with service delivery outcomes.

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- 4) The capacity gap in rural and small municipalities was highlighted as a key implementation bottleneck. Civil society and youth called for urgent investments in local government technical capacity, risk assessment tools, and decentralised financing mechanisms.
  - 5) Stakeholders emphasised the importance of visible and tangible adaptation efforts—such as local water systems, food gardens, and early warning systems—that foster community engagement and build trust. Faith groups, youth, and local government were particularly vocal in calling out the invisibility of many current adaptation measures.

#### 4.2.4. Divergences in stakeholder perspectives

While there was broad alignment on the importance of adaptation, several important differences of perspective emerged:

**Funding Prioritisation:** Civil society, youth, and labour stakeholders expressed frustration that adaptation is underfunded compared to mitigation. They warned this imbalance undermines resilience-building in vulnerable communities.

In contrast, business and local government focused more on embedding adaptation in existing economic and development planning, rather than treating it as a standalone investment stream.

**Top-down vs. Bottom-up Approaches:** Faith groups, civil society, and youth critiqued technocratic and top-down adaptation planning that risks marginalising community voices. They emphasised the need for participatory processes, rooted in local values and knowledge.

By contrast, some government actors prioritised national oversight, harmonisation, and standardised metrics, particularly for reporting and monitoring purposes.

**Uniformity vs. Context Sensitivity:** Local government and civil society cautioned against “one-size-fits-all” adaptation strategies. They argued for spatially differentiated, place-based planning to reflect the diversity of South Africa's landscapes and vulnerabilities.

Some national-level actors leaned toward more standardised adaptation frameworks, potentially overlooking local specificity. Members from roundtable discussions cautioned against the absence of a theoretical framework guiding South Africa's adaptation strategy. They recommended adopting a consistent lens to ensure coherence across sectors and policies. This would allow adaptation efforts to move beyond isolated actions and toward a system-wide resilience agenda.

**Visibility of Adaptation:** Faith-based groups, youth, and local authorities voiced concern that adaptation efforts remain largely invisible at the community level. They warned that unless adaptation is made tangible—through infrastructure, jobs, and services—it risks being undervalued.

In contrast, national stakeholders tended to focus on institutional planning frameworks, with less emphasis on visibility and local ownership.



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This nuanced landscape of adaptation perspectives highlights both the shared imperatives and points of divergence that must be addressed to deliver a coherent, inclusive, and implementable adaptation agenda in South Africa's 2035 NDC.

### **4.3. Means of implementation**

Stakeholders were unanimous in recognising that ambitious climate targets will remain unrealised without credible, well-resourced, and inclusive means of implementation (MOI). Across all groups, there was a strong call for transparent climate finance, investment in human and institutional capacity, fair technology access, and coherent, inclusive governance.

However, stakeholder inputs also revealed important divergences in views on how implementation should be structured, financed, and monitored.

Stakeholders across civil society, academia, and community organisations recommended explicit recognition of synergies between adaptation and mitigation under means of implementation frameworks. Emphasis was placed on the socio-economic benefits of decentralized renewable energy initiatives, which require dedicated, non-commercially driven programmatic funding to enhance energy accessibility, adaptation capabilities, and community resilience.

Participants from small and medium-sized enterprises stressed the necessity of mechanisms ensuring meaningful SME participation within broader procurement ecosystems. There were calls for clear policies facilitating SME inclusion, particularly to counteract dominance by larger suppliers and corporations in climate finance and implementation processes.

Civil society feedback strongly urged incorporating clear mechanisms for integrating grassroots-level data and experiences into NDC planning, emphasizing the necessity of grounding implementation strategies in actual, historical data rather than solely prospective projections. This approach would enhance the practicality and fairness of just transition initiatives.

Stakeholders also identified the need for transparent articulation of potential socio-economic impacts arising from the Just Energy Transition Investment Plans, including anticipated effects on energy pricing, employment, and economic inequality, with recommendations for explicit policy measures to mitigate adverse outcomes.

The following section summarises perspectives under four key subheadings: Financing, Capacity Building and Technology Transfer, Institutional Coordination, and Monitoring, Evaluation, and Transparency.

#### **4.3.1. Financing (domestic and international)**

Stakeholders expressed strong consensus on the importance of diversified, accessible, and transparent finance mechanisms to achieve the objectives of the Nationally Determined Contribution (NDC). Key points of agreement included:

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**National Finance Mobilisation Target:** There was broad support for establishing a national climate finance mobilisation goal. Business stakeholders proposed an ambitious target of ZAR 535 billion annually by 2030.

**Adaptation Finance Tracking:** Stakeholders from focused roundtable discussions engagements raised concerns about fragmented and inaccessible adaptation finance data and the absence of a clear national architecture to oversee its flow. They advocated for a transparent, centralised registry of climate finance allocations, disaggregated by region, sector, and implementing entity, to improve trust and planning. They also noted that effective delivery of adaptation finance requires decentralised access mechanisms and support to unlock financing at municipal and community level.

A suggestion from the gender consultation emphasised the need to update national cost projections for adaptation in the next NDC and to provide transparent information about how funds are allocated and spent. This would improve public accountability and ensure that funding flows reflect priority needs, particularly for women, rural areas, and community-based adaptation efforts.

**Localised Finance Mechanisms:** Civil society, youth groups, and local government representatives emphasised the need for dedicated financial mechanisms that effectively reach grassroots actors. They cautioned that existing systems often marginalise small-scale, community-led initiatives.

**Faith-Based Priorities:** Faith-based organisations called for targeted financial support to enhance climate education, improve service delivery, and strengthen pastoral care, particularly within marginalised communities.

**Private Sector Engagement:** Business stakeholders advocated for the use of blended finance instruments, greater policy clarity, and expanded partnerships with development finance institutions to support large-scale infrastructure projects and climate innovation.

**Just Transition Support:** Labour strongly recommended channelling climate finance towards transition funds that enable skills retraining, support small enterprise development, and facilitate equitable transition pathways.

While general consensus existed around the importance of climate finance, stakeholders diverged on key issues related to its structure and sources:

**Grants vs. Loans / Public vs. Private Finance:** Labour, civil society, and the gender advisory group pushed for increased use of grants and public financing, citing the need to reduce national debt exposure and protect vulnerable populations, and the opportunity to apply grant funding to uplift community-based projects, enhance community resilience and climate-preparedness. Business stakeholders, on the other hand, emphasised the importance of attracting private capital through market-based approaches and public-private partnerships.

**Centralised vs. Decentralised Delivery Models:** Local government, civil society, and youth representatives advocated for decentralised finance delivery—such as ringfenced municipal budgets, community-based grants, and simplified access mechanisms—to ensure funds reach those most in need. National departments and

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business stakeholders tended to favour centralised management and oversight, citing benefits such as efficiency, coordination, and risk mitigation.

Feedback from the financial sector and business community underscored the critical importance of consistent and coordinated policy signals across government to mobilize private climate finance effectively. Clear integration of climate finance within national fiscal frameworks was recommended, alongside transparent tracking mechanisms to ensure accountability.

Additionally, the role of banks and financial institutions in accelerating climate-aligned investment was highlighted, contingent on predictable sectoral transition plans and supportive regulatory environments.

#### 4.3.2. Capacity building and technology transfer

There was broad agreement among stakeholders that capacity constraints—particularly at the local level—represent a significant barrier to effective NDC implementation. Across all groups, there was strong advocacy for sustained investment in technical skills development, institutional strengthening, and equitable access to appropriate technologies.

Key priorities identified include:

**Local Government Capacity Needs:** Local government representatives highlighted urgent capacity gaps in areas such as climate risk assessment, emissions inventories, and climate project preparation. They called for targeted training and support to enhance local implementation capabilities.

**Green Skills and Inclusive Training:** Youth, labour, and civil society stakeholders underscored the need for widespread green skills training, especially in rural and underserved areas. Proposals included the establishment of vocational training programmes and innovation hubs tailored for youth engagement and community empowerment.

**Workforce Coordination Platforms:** Labour and business stakeholders jointly recommended the creation of national platforms to coordinate skills development and workforce planning. They also emphasised aligning Sector Education and Training Authorities (SETAs) with just transition goals to ensure a coherent national approach.

**Gender-Responsive Capacity Building:** The gender advisory group called for targeted support to promote women's leadership in the climate space, including capacity building for women-led small, medium, and micro enterprises (SMMEs). They also stressed the integration of gender equity principles into all aspects of technology transfer and training.

Stakeholders also highlighted the need for grant-based finance to be explicitly directed to unprofitable but socially critical sectors, such as adaptation, rural livelihoods, and solar micro-grids, where women and the poor are disproportionately located.

Concerns were raised about the current focus on electric vehicles and green hydrogen, with a call to reprioritise investment toward broader public transport systems. The Climate Change Act and its provisions on carbon tax and sectoral emissions targets

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were emphasised as South Africa's principal mitigation tools, with stakeholders recommending deeper reflection of these mechanisms in the NDC.

**Technology Access and Innovation Support:** Business stakeholders advocated for measures to enhance local manufacturing of clean technologies, address regulatory and logistical barriers to technology uptake, and foster innovation ecosystems that enable commercialisation and scale-up of solutions.

**Knowledge Sharing and Accessibility:** Multiple groups called for the establishment of open-access knowledge platforms, the development of plain-language training materials, and outreach in local languages.

Special attention was given to ensuring accessibility for marginalised communities, with faith-based and civil society networks seen as key channels for outreach and dissemination.

### 4.3.3. Institutional coordination

There was broad convergence on the need for alignment on various topics. Stakeholders strongly agreed on the urgent need for improved institutional coordination to ensure effective NDC implementation. There was consensus that policy coherence, clearly defined mandates, and structured multi-level coordination are essential. However, stakeholders expressed concern that current fragmentation—particularly among the Department of Forestry, Fisheries, and the Environment (DFFE), the Department of Mineral Resources and Energy (DMRE), and National Treasury—along with weak vertical alignment between spheres of government, poses a significant risk to successful delivery. There was a call for clearly highlighting intersections between climate change and mental health within national climate change related planning, acknowledging increased stress, anxiety and trauma stemming from climate-induced disasters.

### Key Proposals and Concerns:

**Inclusive and Permanent Stakeholder Structures:** Labour, civil society, and youth representatives called for the establishment of inclusive, permanent stakeholder engagement mechanisms. These platforms should ensure meaningful participation of trade unions, community groups, women's organisations, and youth in the design, implementation, and oversight of NDC actions.

**Local Government Integration:** Local government stakeholders advocated for formal recognition and resourcing of their roles within national climate governance. They proposed institutional mechanisms that enable municipalities to co-develop, align, and report on NDC-related actions through Integrated Development Plans (IDPs) and Service Delivery and Budget Implementation Plans (SDBIPs).

**Harmonisation of Planning and Budgeting Frameworks:** Civil society organisations highlighted misaligned planning timelines and overlapping mandates across departments and sectors. They called for the synchronisation of sectoral strategies, budget cycles, and monitoring and evaluation frameworks to enhance coherence and accountability.

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**Role of Faith-Based Institutions:** Faith-based stakeholders proposed the creation of formally recognised platforms for collaboration between government and religious institutions. These institutions, they argued, offer extensive community reach and trust, making them valuable partners in climate awareness, advocacy, and implementation.

**Business Priorities:** Business stakeholders emphasised the importance of policy clarity and alignment across industrial, energy, and fiscal domains. They noted that coordinated and consistent policy signals are critical for reducing investment risk and enabling private sector engagement in climate solutions.

**Governance Structures:** Stakeholders from roundtable discussions underscored the need to move beyond existing institutional silos by establishing a dedicated national climate implementation body or public-private platform tasked with delivering the NDC. They expressed concern that traditional governance structures may not be equipped to manage the complexity and pace of the climate transition.

Drawing on past experiences, where South Africa performed better under fast-onset crises, they proposed the development of slower, more deliberate implementation pathways suited to the chronic and systemic nature of climate risks. There was strong support for rethinking coordination models to centre delivery, accountability, and cross-sectoral alignment.

#### 4.3.4. Monitoring, evaluation and transparency

Stakeholders concurred on the requirements for urgent demand for credible monitoring and evaluation (M&E) Systems. Stakeholders expressed deep concern that without a robust and transparent M&E system, the NDC risks remaining a “paper ambition.” There was strong, cross-cutting support for the development of participatory, integrated, and transparent M&E frameworks spanning all levels of government.

Concerns were highlighted around transparency, data integrity, and inclusive representation in mitigation planning. It was recommended that robust measurement, reporting, and verification systems incorporate transparent and community-generated data, reflecting actual localized climate impacts and community responses.

Civil society and governance-focused NGOs recommended improved transparency and accountability within climate-related policy processes. Stakeholders called explicitly for mechanisms to prevent undue influence from anti-climate lobbying interests, stressing the need for publicly available, transparent data and methodologies underpinning NDC decisions. Adherence to governance principles outlined in national climate legislation was emphasized to ensure decisions are scientifically robust, equitable, and responsive to evolving climate risks.

Gender-constituency stakeholders emphasized strengthening gender and intersectionality considerations across climate actions. Specifically, participants highlighted that mitigation and adaptation frameworks must explicitly include gender-responsive targets and actions, particularly in rural and marginalized communities, and developing concrete indicators to measure progress on gender equality within the context of the Just Energy Transition.



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### The following were key suggestions and priorities:

**SMART Indicators and Public Accountability:** Youth, civil society, and labour groups called for the adoption of SMART (Specific, Measurable, Achievable, Relevant, Time-bound) indicators, the regular publication of accessible progress reports, and the establishment of independent oversight bodies that allow for meaningful public participation.

**Inclusive and Disaggregated Data:** The gender advisory group and faith-based organisations advocated for the use of disaggregated data—by gender, age, and location—and for the inclusion of informal sectors and marginalised groups in monitoring processes, ensuring that no communities are left behind.

**Alignment with Local Government Systems:** Local government representatives stressed the importance of aligning national M&E frameworks with municipal Integrated Development Plans (IDPs), Service Delivery and Budget Implementation Plans (SDBIPs), and existing performance management systems to ensure coherent implementation at the local level.

**Real-Time Tools and Adaptive Learning:** Multiple stakeholders highlighted the need for real-time monitoring tools, open-data platforms, and local-level feedback loops. These would support adaptive management and enable mid-course corrections based on evolving conditions and performance insights.

There were however some points of divergence. Civil society and youth stakeholders called for full transparency in tracking finance flows and delivery metrics. However, some government and business representatives raised concerns about excessive disclosure, particularly where it could compromise sensitive financial negotiations or confidential investment agreements.

Stakeholders from roundtable discussions called for institutionalisation of backward-looking review mechanisms, including regular audits of implementation progress and lessons learned from prior NDC cycles. They recommended that the updated NDC include provisions for climate finance effectiveness tracking, institutional performance reviews, and transparent reporting on structural delivery gaps. This, they argued, would strengthen adaptive management and ensure course correction is embedded into long-term implementation planning. Further suggestions included an independent monitoring body with access to real-time implementation data, able to assess systemic coherence, and track sectoral progress. Coordination platforms should extend beyond government to include civil society, academia, and technical experts to bridge knowledge and capacity divides.

Stakeholders from roundtable discussions additionally proposed that adaptation and implementation indicators should be disaggregated spatially and functionally linked directly to key delivery sectors like water, food, and public health. The suggestion made was to incorporate feedback loops and real-time tracking into the M&E system to enable adaptive management. A central dashboard or observatory was recommended as a mechanism to collate, visualise, and publish progress in accessible formats.

Several stakeholders from roundtable discussions raised concerns that climate-related risks remain poorly integrated into South Africa's planning and investment systems. They recommended that climate risk assessments be mainstreamed across both public and private sector decision-making, linked explicitly to NDC delivery planning. This would include ensuring that all major infrastructure, financial, and policy decisions are screened for climate risk exposure and that the national climate response is framed not only as a developmental opportunity, but as an urgent risk management imperative.

In conclusion, stakeholders were clear: without credible, inclusive, and accountable means of implementation, South Africa's 2035 NDC will struggle to achieve either ambition or equity. The NDC must therefore be accompanied by clear delivery systems—including diversified finance, equitable capacity development, coherent institutions, and inclusive monitoring—that reflect South Africa's complex social, economic, and governance realities.

#### 4.4. Stakeholder comparison matrix

Considering the assessment above, the following table outlines a stakeholder comparison matrix according to the NDC themes, which highlights key inputs from each stakeholder group.

Group	Mitigation	Adaptation	Means of Implementation
<b>Business</b>	Support sector-specific targets, 6–7 GW renewable energy/year, realistic timelines; stress alignment with IRP, JET-IP, and TDP; emphasise grid upgrades and feasibility; raise concerns about overambitious targets without delivery plans.	Call for integration of adaptation into the NDP to address slow-onset risks (e.g. drought); promote community-level innovation and electrification with socio-economic returns.	Advocate for a national finance mobilisation target (ZAR 535bn/year), alignment with DFIs, blended finance; seek stable investment signals (e.g., tripling renewables); call for clear public-private partnership frameworks aligned with socio-economic priorities.
<b>Civil Society</b>	Advocate fossil fuel phase-out; enforceable, equity-based carbon budgets; oppose nuclear; demand public emissions registry; call for climate-proof infrastructure scrutiny.	Support locally driven adaptation, disaster risk reduction, climate-proof health and water systems; promote nature-based solutions; urge inclusion of marginalised and Indigenous groups.	Demand finance transparency (sources and disbursements), direct funding for community-led initiatives; advocate for plain-language communication tools and accessible public data platforms; raise concerns about finance justice and shrinking access to international climate finance.
<b>Faith</b>	Promote clean energy in religious spaces, moral	Emphasise spiritual values—care, solidarity,	Advocate for funding of faith-based

Group	Mitigation	Adaptation	Means of Implementation
	imperative for emissions reduction, oppose nuclear; support faith-aligned campaigns and symbolic climate action.	stewardship—in community-led adaptation; support integration of climate action into feeding schemes, pastoral care, and rural services.	education programmes and youth leadership training; propose platforms for government–faith collaboration; stress communication in culturally resonant terms; call for inclusion in governance and outreach delivery.
<b>Labour</b>	Call for socially inclusive, sector-specific emissions targets; oppose privatisation of energy; support alignment with industrial policy; warn against abstract targets without plans.	Advocate job-linked adaptation (e.g., flood infrastructure, housing, water systems); promote public employment; highlight risks to vulnerable outdoor and informal workers.	Call for workforce transition funds, reskilling via SETAs, labour impact assessments, interdepartmental platforms; demand ringfenced funds for just transition; flag slow delivery of existing commitments and exclusion of informal workers from NDC processes.
<b>Local Government</b>	Highlight municipal role in emissions reductions; seek enabling regulations for local RE generation and wheeling; emphasise need for data systems and tailored mitigation pathways.	Emphasise place-based planning; call for risk mapping in IDPs and SDBIPs; highlight escalating climate burdens (e.g., floods, droughts) and need for measurable local adaptation indicators.	Seek ringfenced municipal climate finance; call for access to national and global funds; urge capacity building in GHG inventorying, project preparation; request formal integration into national governance and decision-making frameworks.
<b>Youth</b>	Demand rapid decarbonisation, enforceable carbon budgets, sector-specific GHG targets (CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O); support RE scale-up and educational integration; mixed views on transitional fuels and nuclear.	Promote “green villages” and youth-involved disaster risk planning; prioritise resilience of basic services (housing, sanitation, transport); advocate gender and child-sensitive adaptation.	Call for youth-focused finance access, skills development, and inclusive M&E with disaggregated data; propose youth oversight roles in governance; advocate for green job creation to replace fossil fuel employment, supported by targeted training for renewable energy and sustainable sectors.

Group	Mitigation	Adaptation	Means of Implementation
<b>Gender Advisory</b>	Promote gender-inclusive green jobs; recommend quotas for women-led energy projects and women-owned SMMEs; push for disaggregated data and inclusion in mitigation planning.	Advocate for co-created solutions with women; prioritise care burdens, land rights, safety, and access; propose multi-generational women's networks and inclusive early warning systems.	Demand gender-responsive budgeting, grant prioritisation for women-focused sectors; promote municipal delivery capacity for gender-responsive services; call for transparent, inclusive finance systems targeting women and small-scale actors.
<b>Focussed Thematic Roundtable Discussions</b>	Supported an ambitious NDC emissions range, spatially integrated planning, and alignment with IRP, JET-IP, and industrial policy. Cautioned against over-reliance on green hydrogen and CCS; called for focus on land-sector co-benefits.	Emphasised structural transformation, regional indicators, and integration into long-term infrastructure and coastal planning. Recommended centralised, public adaptation data systems and use of national frameworks.	Proposed a national adaptation finance registry, decentralised access, and expert-led, real-time monitoring. Raised concerns about data gatekeeping and called for broader institutional participation and transparency.

## 5. SYNTHESIS OF STAKEHOLDER PERSPECTIVES

Drawing from the extensive inputs received through the PCC's national stakeholder consultations and the 2025 National Colloquium, this chapter presents a synthesis of stakeholder perspectives aimed at supporting the development of an ambitious, implementable, and just NDC for 2035. These views reflect both points of convergence and divergence among stakeholder groups, while offering actionable guidance for government, industry, and civil society.

### 5.1. Anchor the NDC in Science, Justice, and Delivery Feasibility

Develop a science-aligned, equity-informed decarbonisation pathway with enforceable carbon budgets and sector-specific targets, tailored to South Africa's socio-economic context. This includes:

- 1) Net-zero commitment by 2050, with interim milestones aligned to a 1.5°C trajectory.
- 2) Sector-specific emissions targets for energy, industry, transport, and agriculture.
- 3) Strong legal enforcement mechanisms and public emissions registries.
- 4) Tools to track fair share, equity, and historical responsibility.

Balance ambition with delivery feasibility, informed by clear implementation plans, public financing, and institutional readiness. Recognise the differing capacities and starting points of each sector and municipality.

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## 5.2. Increase Renewable Energy Roll-out and Energy Efficiency at Scale

Set annual renewable energy targets of 6–7 GW (as supported by business and youth), integrated with:

- 1) Tripling of national energy efficiency efforts.
- 2) Grid infrastructure upgrades to accommodate decentralised and wheeling arrangements.
- 3) Local manufacturing and SMME support within renewable value chains.
- 4) Transition away from fossil fuels through enforceable decommissioning timelines.

Avoid over-reliance on transitional fuels or nuclear without full lifecycle assessments and alignment with Just Transition principles. Ensure all energy investments are aligned with climate equity, affordability, and job creation goals.

## 5.3. Institutionalise Participatory, Inclusive, and Gender-Responsive Climate Governance

Stakeholders spanning civil society, NGOs, and gender advocacy groups strongly advocated embedding just transition principles explicitly within NDC planning and implementation. A recurring theme was the necessity of gender-responsive transition policies that integrate explicit gender equality considerations, recognizing differentiated impacts of climate actions on men, women, and marginalized genders.

Recommendations included embedding procedural justice in the NDC by institutionalising multi-level, permanent stakeholder forums - including youth, labour, civil society, women, persons with disabilities, and traditional leaders. These platforms should:

- 1) Co-design policies.
- 2) Participate in implementation oversight.
- 3) Be backed by formal mandates, resourcing, and legal recognition.

Mainstream gender equality and intergenerational equity across all NDC pillars by:

- 1) Setting quotas and indicators for women-led initiatives.
- 2) Embedding gender-responsive budgeting and disaggregated data systems.
- 3) Creating youth oversight bodies and innovation hubs.
- 4) Supporting climate actions that address care burdens, safety, education, and leadership pathways.

## 5.4. Strengthen Locally Led Adaptation with Resourcing and Visibility

Make adaptation a central NDC pillar, on par with mitigation, through:

- 1) Clear, locally driven adaptation plans with measurable outcomes.
- 2) Formal mandates and funding for municipalities to deliver resilient infrastructure, early warning systems, and nature-based solutions.
- 3) Integration into IDPs, SDBIPs, and spatial development frameworks.
- 4) Priority support for informal settlements, rural communities, women-headed households, and people with disabilities.

Establish a national adaptation data and monitoring platform that centralises regional indicators and makes them publicly accessible. Indicators should draw on SDGs,

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StatsSA, and TEEB frameworks, and enable municipalities to plan and report effectively on local adaptation actions.

Adopt a “green villages” model and expand public employment in adaptation infrastructure and ecosystem restoration, directly linking adaptation with job creation and local ownership.

## **5.5. Establish a Transparent, Inclusive, and Diversified Climate Finance Architecture**

Create a climate finance strategy that includes:

- 1) A national mobilisation target of ZAR 535 billion per year by 2030 (as recommended by labour).
- 2) Blended finance instruments to leverage concessional and private capital.
- 3) Ringfenced municipal climate funds and decentralised finance mechanisms for community-level action.
- 4) Dedicated windows for women-led enterprises, youth, faith-based institutions, and informal sector actors.
- 5) Ensure grant-based climate finance is prioritised for non-profitable but socially vital sectors such as adaptation, skilling, rural livelihoods, and community-based renewable energy (e.g., solar micro-grids), where women and low-income groups are disproportionately located. Explore regulatory mechanisms to align corporate social investment with national climate resilience and equity objectives.
- 6) Full transparency in climate finance flows, disbursements, and beneficiaries—publicly reported in plain language formats.
- 7) Update national adaptation cost projections and ensure transparent disclosure of funding allocations to strengthen credibility and equity in adaptation budgeting.

Prioritise grants over loans for vulnerable constituencies and ensure climate finance aligns with national debt sustainability and social development priorities.

## **5.6. Align Skills Development, Technology Transfer, and Innovation with Just Transition Goals**

Stakeholders underscored the importance of targeted re-skilling programs, local manufacturing of renewable technologies, and policies incentivising the growth of domestic green industries to mitigate employment impacts associated with transitioning away from fossil fuels. Recommendations included the development of a national skills and technology plan that:

- 1) Expands green skills training through SETAs, vocational institutions, and public-private partnerships.
- 2) Aligns industrial and energy strategies with workforce development for low-carbon sectors.
- 3) Promotes localisation of clean technologies (e.g., wind, solar, EVs) through public procurement and entrepreneurship support.
- 4) Channels innovation funding to rural, youth-led, and women-owned initiatives.



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Ensure that climate education—including just transition, adaptation, and sustainability—is embedded in national curricula at school and tertiary levels.

## **5.7. Integrate National-Local Institutional Coordination and Coherence**

Reform institutional governance to:

- 1) Clarify mandates across DFFE, DMRE, National Treasury, and other line departments.
- 2) Embed NDC objectives in national planning instruments (NDP and the IRP).
- 3) Empower municipalities through defined roles, reporting duties, and budget allocations.
- 4) Elevate the roles of traditional authorities, Indigenous knowledge holders, and faith actors in both adaptation and mitigation governance.

Address fragmentation and policy misalignment by establishing an interdepartmental coordination platform accountable for NDC implementation.

The feasibility of a dedicated national climate implementation platform should be explored. Such a structure could bridge public-private efforts, provide technical oversight, and coordinate cross-departmental delivery in line with the NDC's objectives. The platform should be designed with a long-term mandate to avoid short-termism and crisis-driven responses, ensuring consistent progress toward 2050 goals.

## **5.8. Operationalise Monitoring, Evaluation, and Accountability Mechanisms**

Develop a SMART, disaggregated, and participatory M&E system that includes:

- 1) Indicators disaggregated by age, gender, geography, and socio-economic status.
- 2) Integration with IDPs, SDBIPs, and sectoral performance plans.
- 3) Civil society and youth oversight committees to track and review progress.
- 4) Real-time tools for adaptive management and mid-course correction.
- 5) Transparent, public dashboards and annual reviews.

Ensure regular updates are used to refine implementation pathways and address emerging gaps or trade-offs.

In addition to forward-looking monitoring systems, the NDC should include backward-looking institutional learning processes. This includes periodic reviews of what has and has not worked under previous cycles, with institutional audits, delivery diagnostics, and climate finance tracking systems introduced as standard features of the implementation framework.

The above suggestions do not represent a consensus among all stakeholders but rather a synthesis of the most strongly supported proposals across the consultation process. Where divergence exists—such as on carbon pricing, the role of nuclear energy, or financing modalities—these differences should be addressed through structured dialogue, piloting of multiple options, and inclusive review processes during NDC implementation.

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By centring justice, inclusion, and practicality, South Africa's 2035 NDC can serve as both a climate blueprint and a development compact that honours the voices, rights, and aspirations of all its people.

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## Appendix: Stakeholder Perspectives by Group

The PCC's engagement with key social partners in South Africa on the 2035 NDC development. Capturing these perspectives is fundamental to ensuring stakeholders' opinions are included within the process.

The inputs were captured for adaptation, mitigation and means of implementation across a range of topics. Most of the engagements aimed to gain insights on the following key topics:

- 1) What criteria should be followed in developing the NDC?
- 2) What specific actions/targets should be included in the NDC?
- 3) What are you worried about with the NDC?

However, the structure of the gender advisory working group was an outlier in this regard. The aim of the gender consultation was to:

- 1) Review the 2025-2030 NDC for South Africa and indicate how the previous NDC could have been more gender responsive.
- 2) Participate in three breakaway sessions (three): (mitigation, adaptation, and resilience and means of implementation) discuss what strategies are needed to ensure a gender responsive NDC.
- 3) Identify barriers to gender-responsive implementation and propose solutions.

This appendix provides a summary of the most significant insights and points of contention that emerged from each engagement, organized by the themes previously outlined. It is important to note that these summaries are intended to reflect the general sentiments of stakeholder groups, rather than to capture individual inputs or specific comments.

### Business

Engagement with the business sector revealed a mix of cautious optimism and concern. Business stakeholders recognised the potential for the NDC to drive innovation, investment, and market opportunities in green technologies and also flagged the risk of poorly aligned, top-down targets that might strain industry and the economy. They stressed that South Africa's climate commitments must reflect local realities, be backed by clear incentives, and be integrated with broader economic policy. The following themes arose relating to the key topics and subtopics.

### Criteria to be followed in developing the NDC

The points below reflect business perspectives on the foundational principles and strategic considerations that should guide the development of South Africa's updated NDC.

#### Mitigation:

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- 1) South Africa must remain ambitious and competitive in global markets, especially given shifting geopolitical and trade dynamics. Business stakeholders stress that the NDC needs to set bold and forward-looking mitigation targets to capture emerging economic opportunities while maintaining a competitive edge. This ambition is seen as crucial not only for environmental performance but also for safeguarding the nation's trade positioning, attracting investment, and ensuring that South Africa remains a key player amid rapidly evolving international market and policy landscapes.
  - 2) Implementation of decarbonisation must align with national energy policy instruments such as the IRP, JET-IP, and the Transmission Development Plan. Aligning decarbonisation efforts with these strategic policy frameworks ensures coherence between climate action and existing energy planning. Business perspectives emphasize that the integration of the NDC with the Integrated Resource Plan (IRP), the Just Energy Transition Investment Plan (JET-IP), and ongoing transmission grid strategies is essential to leverage synergies, avoid duplicative efforts, and create a smooth pathway for technology adoption and energy system upgrades.
  - 3) A realistic, coordinated approach is essential when recognising departmental roles and implementation capacity. Stakeholders call for clear assignment of responsibilities across government departments and agencies to ensure that policy targets are achievable. A coordinated approach would involve developing practical implementation roadmaps that consider the capacities of various institutional actors, thereby avoiding fragmentation and ensuring that each role, from policy formulation to on-the-ground execution, is clearly defined and adequately resourced.
  - 4) Grid infrastructure upgrades (stability, reliability, expansion) are a non-negotiable enabler of decarbonisation targets. Stakeholders stress that modern, resilient, and expanded grid infrastructure is vital for integrating renewable energy sources and ensuring energy security. Upgrades must focus on enhancing the stability and reliability of the supply system to accommodate increased renewable penetration, and they are seen as fundamental to achieving the aggressive emissions reductions targeted in the NDC.

#### **Adaptation:**

- 1) Alignment is needed between the IRP, Climate Change Act, National Adaptation Plans (NAPs) and JET-IP implementation to support coherent climate planning. Stakeholders underline that a unified approach across these policy instruments helps build a comprehensive framework for climate action. When adaptation strategies are harmonized with existing regulatory frameworks and investment plans, decision-makers can ensure that measures are mutually reinforcing and that there is continuity between mitigation, adaptation, and overall energy planning.
- 2) Adaptation needs to be embedded into broader development strategies, particularly the National Development Plan (NDP), to address slow-onset disasters. There is a strong view from the business community that climate adaptation should not be an isolated exercise. By integrating adaptation planning into the NDP, policies can address long-term challenges like drought and gradual sea-level rise.

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Embedding adaptation within national development strategies ensures that resilience measures are not only reactive but also proactively support economic growth and social development, reducing vulnerability to slow-onset climate hazards.

### **Means of Implementation:**

- 1) NDCs must reflect clear frameworks for technology transfer, capacity building, and finance mobilisation. Business stakeholders advocate for the development of explicit mechanisms within the NDC for transferring and adopting new technologies, coupled with targeted capacity-building programs. This would include establishing benchmarks for skill development and innovation that are critical to supporting the low-carbon transition, ensuring that the workforce and industry are well-prepared to meet new challenges.
- 2) Development banks and international finance institutions should be strategically aligned with NDC delivery to leverage concessional finance. There is an emphasis on the strategic role of financial institutions in unlocking resources for climate action. Stakeholders suggest that aligning the mandates of development banks and international finance institutions with the goals of the NDC can help secure concessional finance, reduce borrowing costs, and provide the fiscal support necessary to invest in transformative climate projects.
- 3) The NDC must clearly articulate how investment flows will be catalysed and aligned with social and economic priorities. Clarity in the financial roadmap is essential, according to business stakeholders. The NDC should detail not only the sources and mechanisms of funding but also how these investments will be directed to support both climate objectives and broader socio-economic development. This includes setting out clear strategies for public-private partnerships, ensuring that investment flows contribute to job creation, technological innovation, and sustainable economic growth while addressing local community needs.

### **Specific actions/ targets that should be included in the NDC**

Business stakeholders proposed several concrete actions and measurable targets that could enhance the credibility and clarity of the NDC.

### **Mitigation:**

- 1) Set a target of 6–7 GW of renewable energy additions per annum, with interim targets for 2030 and 2040. This target offers a clear, quantifiable goal to drive significant renewable energy capacity growth. By establishing interim benchmarks for 2030 and 2040, it provides periodic checkpoints to monitor progress and adjust policies, ensuring that investments in renewable infrastructure are aligned with national decarbonization needs and competitive global market positioning.
- 2) Define sector-specific and economy-wide emissions targets that are just and achievable, considering MOI availability. Emissions reduction goals must be specific to the unique challenges and opportunities of each economic sector while also reflecting the overall national context. These targets should account for the availability of technology, financial resources, and institutional capacity (MOI),

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- ensuring that the transition is both ambitious and realistically achievable, and that it supports a just transition for workers and communities affected by decarbonization.
- 3) Prioritise decarbonising freight through a road-to-rail shift, renewable-powered electrification, and fuel import reduction. Recognising the heavy emissions footprint of the freight sector, business stakeholders urge targeted action to modernize logistics. This includes shifting freight transport from road to rail, which is generally more energy-efficient, accelerating the adoption of electric vehicles powered by renewables, and reducing the reliance on imported fossil fuels. Such measures not only lower overall emissions but also enhance energy security and create opportunities for infrastructure modernization.
  - 4) Support the renewables value chain by incorporating entrepreneurship and localisation strategies. To ensure that renewable energy growth delivers tangible economic benefits, policies should encourage local entrepreneurship and build a domestic supply chain. By promoting localisation, the NDC can stimulate job creation, foster technological innovation, and strengthen South Africa's competitive edge in the global renewables market, thereby ensuring that economic growth accompanies environmental progress.

**Adaptation:**

- 1) Integrate adaptation into the NDP, particularly in response to droughts and other slow-onset climate impacts. Given the increasing frequency and severity of droughts and other gradual climate stresses, adaptation strategies must be fully embedded within the broader National Development Plan (NDP). This integration ensures that long-term investments in water management, agriculture resilience, and infrastructure are prioritized alongside economic development, providing a strategic and proactive approach to mitigating slow-onset climate impacts.
- 2) Support community-level innovation, setting targets or incentives that recognise local action. Empowering communities to develop specific, localised adaptation solutions is essential. This could include establishing specific targets and financial incentives for grassroots initiatives that improve local resilience, such as developing community early warning systems or adopting innovative water-saving technologies. Recognising and incentivising local action not only builds capacity but also ensures that adaptation measures effectively address the unique challenges faced by each community.
- 3) Promote electrification in the transport sector with a focus on social, environmental, and economic returns. Advancing the electrification of transport contributes to significant emissions reductions while also generating wide-ranging social and economic benefits. Policies should incentivize the adoption of electric vehicles, develop widespread charging infrastructure, and ensure that the transition is accessible to all segments of society, thereby enhancing environmental quality, reducing reliance on imported fuels, and supporting sustainable job creation in emerging industries.
- 4) Recognise the importance of adaptation finance and integrate targets to protect vulnerable communities. Securing dedicated financing for adaptation is critical to safeguarding those most at risk from climate change. The NDC should set clear financial targets to mobilise adaptation funds, ensuring that investments are directed towards critical infrastructure, health services, and community programs



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designed to reduce vulnerability and build long-term resilience in areas most affected by climate hazards.

### **Means of Implementation:**

- 1) Establish a finance target for the NDC to meet the PCC-estimated need of ZAR 535 billion per year by 2030. A clearly defined finance target is essential to ensure adequate resources are available for climate action. By committing to mobilize ZAR 535 billion annually by 2030, the NDC sends a strong signal to investors and financial institutions, fostering policy certainty and catalysing both public and private sector funding for comprehensive mitigation and adaptation projects.
- 2) Include ambitious but feasible policies that support mitigation, adaptation, and just transition simultaneously. The NDC should weave together policies that not only drive emissions reductions and improve resilience but also facilitate a fair transition for affected workers and communities. This integrated approach involves setting clear, actionable targets that consider economic, social, and environmental dimensions, ensuring that the climate response is holistic and equitable.
- 3) Back NDCs with clear, stable investment signals (e.g. phasing out fossil fuels, tripling renewables, doubling energy efficiency). Investors and market players require definitive signals to make long-term commitments. The NDC should articulate firm policy directions, such as gradually phasing out fossil fuels, aggressively scaling up renewable energy capacity, and significantly boosting energy efficiency, to build confidence and provide a stable, predictable environment that accelerates the transition to a low-carbon economy.
- 4) Ensure policy coherence and set out a roadmap for how climate action aligns with social protection, job creation, and economic growth. Achieving effective climate action demands a coordinated effort across multiple policy domains. The NDC must detail a clear roadmap that aligns climate objectives with broader social and economic policies, ensuring that measures for reducing emissions and enhancing resilience also contribute to job creation, social protection, and overall economic growth. This coherence helps avoid policy fragmentation and maximises the developmental benefits of the climate strategy.

### **Concerns regarding the NDC update**

Business stakeholders shared concerns about feasibility, coherence, and the broader economic context in which the NDC will be implemented. Their input underscores the need for realism, consultation, and transparency.

### **Mitigation:**

- 1) Overambitious NDC targets may be unrealistic given current socioeconomic and energy system constraints. This concern highlights that setting overly high targets without factoring in the nation's current capacities could result in unattainable goals, misdirected resources, and potential economic setbacks. Realistic targets should be grounded in a careful assessment of available technology, infrastructure, and social

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readiness to ensure that the transition does not stall progress or undermine economic stability.

- 2) Eskom's financial and operational struggles challenge rapid renewable integration and could undermine mitigation efforts. Given Eskom's pivotal role in the national energy landscape, its ongoing financial and operational difficulties may hinder the timely deployment of renewable energy projects. These challenges can delay grid modernisation and affect overall energy reliability, thereby compromising the effectiveness of mitigation measures and the country's ability to meet its emissions reduction targets.
- 3) Delay in action and fragmented departmental mandates are contributing to lost time and opportunity, including around green skills and food security. The slow pace of implementation and lack of cohesive coordination across government departments means that vital opportunities for creating green jobs, developing sustainable skills, and enhancing food security are being missed. A more synchronized approach with clear role definitions is needed to accelerate actions and capture the synergistic benefits of integrated climate and socioeconomic planning.
- 4) Concern about the lack of tangible progress on existing just transition goals despite extensive planning. Despite comprehensive planning frameworks, there remains substantial scepticism over whether these plans are translating into real-world impacts such as retraining workers, creating new job opportunities, and ensuring economic support for communities in transition. This underscores the need for robust implementation strategies and continuous monitoring to verify that the just transition is delivering tangible benefits.

#### **Adaptation:**

- 1) Business expressed concern over one-directional engagement with communities where affected groups are treated as passive recipients, not active contributors. This concern calls attention to the importance of participatory processes that actively involve local communities in shaping adaptation strategies. When community members are merely seen as beneficiaries rather than partners, adaptation measures risk being misaligned with local needs, reducing their effectiveness and long-term sustainability.
- 2) Missed opportunities in incorporating Indigenous knowledge systems and local experience to shape adaptation. The feedback stresses that Indigenous knowledge and local practices offer valuable insights into sustainable adaptation, yet they are often overlooked in formal planning processes.

#### **Means of Implementation:**

- 1) Climate finance disbursement lacks transparency - more visibility on where and how funds are used is needed. The call for greater transparency emphasises that stakeholders need clear, accountable reporting on climate finance flows. Without this clarity, there is a risk that funds may not reach their intended targets, diminishing the overall impact of climate initiatives and eroding trust among investors and the public.
- 2) NDC implementation may falter without clear signals to investors or structured engagement with entrepreneurs and small businesses. Business stakeholders stress that reliable policy signals and well-organized engagement channels for private sector players are crucial. Clear, consistent communication and concrete financial incentives are needed to mobilise investment in low-carbon solutions, ensuring that innovative SMEs and entrepreneurs are integral to the transition process.

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- 3) Business urged caution around setting NDC ambition levels without a concrete delivery plan, particularly where social support systems are underdeveloped. There is a strong warning that ambitious targets must be accompanied by detailed and actionable delivery plans. Without well-developed social support mechanisms, training, and safety nets in place, overly ambitious goals risk being unfulfilled, which could lead to implementation gaps and exacerbate social vulnerabilities rather than provide a balanced, just transition.

## Civil Society

The civil society engagements yielded comprehensive feedback on both the NDC development process and its intended content. Importantly, civil society stakeholders welcomed the commitment to updating South Africa's NDC and acknowledged the importance of aligning it with the principles of a just transition. They stressed that ambition must be accompanied by justice, transparency, and clear accountability mechanisms to ensure that the NDC does not deepen existing inequalities. The perspectives below are categorised according to the three central consultation questions, and further organised by Mitigation, Adaptation, and Means of Implementation (MOI).

### Criteria to be followed in developing the NDC:

The points below reflect civil society perspectives on the foundational principles and strategic considerations that should guide the development of South Africa's updated NDC.

#### Mitigation:

- 1) The NDC should reflect a clear, science-based pathway toward full decarbonisation, including a firm net-zero target by 2050. This approach ensures that climate policies are grounded in robust scientific evidence and contribute to long-term global efforts against climate change. It demonstrates a commitment to transformative change, guiding investments and policy reforms toward achieving absolute emissions reductions over the coming decades.
- 2) Sector-specific targets (e.g. power, transport, AFOLU) must be clearly defined and enforceable, with no exemptions for major polluters. Clear and enforceable targets for each key sector provide accountability and prevent loopholes that allow significant polluters to continue business as usual. This specificity is crucial for tracking progress and ensuring that every sector contributes fairly towards reducing overall emissions without undermining the integrity of the national commitment.
- 3) South Africa's NDC must align with climate equity principles, including fair share contributions informed by tools such as the Climate Equity Reference Calculator. Integrating climate equity ensures that the country's responsibilities are balanced with its development needs and historical emissions. Tools like the Climate Equity Reference Calculator help identify fair and just targets that consider the unique socio-economic context of South Africa, ensuring that the burden of transition is shared equitably both nationally and internationally.
- 4) Nature-based solutions, including the protection of forests, wetlands, and mangroves should form a central pillar of mitigation efforts. By prioritising nature-based solutions, the NDC can leverage the natural capacity of ecosystems to

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sequester carbon while simultaneously enhancing biodiversity and providing additional socio-economic benefits. This approach not only supports emissions reductions but also contributes to ecological resilience and sustainable land management practices.

- The NDC must commit to the phase-out of fossil fuels, aligned with a 1.5°C global pathway and international equity considerations. A clear commitment to phasing out fossil fuels underscores the urgency of transitioning away from carbon-intensive energy sources. This commitment should be synchronized with a globally recognized temperature goal of 1.5°C and factor in equity concerns, ensuring that the transition supports just outcomes for all affected stakeholders while contributing to the international climate agenda.

### **Adaptation:**

- 1) Adaptation must be treated as urgent and locally driven, with meaningful inclusion of affected communities in planning and response strategies. Recognising the immediacy of adaptation needs emphasises that local communities should not be passive recipients of top-down policies. Instead, their direct input and experiences must guide the creation of adaptive strategies that address their specific vulnerabilities and build resilience in a manner that is both context-sensitive and responsive to local realities.
- 2) There were strong calls to recognise Indigenous knowledge systems, secure tenure rights, and acknowledge the critical role of natural ecosystems in resilience-building. Integrating Indigenous knowledge and local practices enhances the relevance and effectiveness of adaptation measures. Securing tenure rights for affected communities also ensures they have a say in resource management and land use, thereby ensuring resilient ecosystems that function as natural buffers against the impacts of climate change.
- 3) Adaptation planning should actively promote climate justice for marginalised groups including persons with disabilities, women, and informal workers. This focus aims to ensure that adaptation measures are not only technically sound but also socially equitable. Addressing the needs of marginalised groups helps mitigate existing inequalities by ensuring that resilience strategies are accessible, inclusive, and sensitive to the unique challenges faced by these groups, thereby empowering them in the transition process.
- 4) Adaptation strategies must be integrated into national frameworks, prioritising wellbeing, health systems, and food and water security. Embedding adaptation within broader national policies ensures that climate responses complement and enhance existing development initiatives. By focusing on the fundamentals of wellbeing, health systems, and essential resource security, the NDC can promote a holistic approach that safeguards communities from both immediate and long-term climate risks.

### **Means of Implementation:**

- 1) Civil society demanded full transparency regarding NDC financing including sources, assumptions, disbursements, and expenditure. Transparency in financing is critical for building trust among all stakeholders. Clear disclosure of where funds originate, how they are allocated, and the underlying financial assumptions allows for proper oversight and accountability, ensuring that resources are used effectively to drive the ambitious goals set out in the NDC.

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- 2) Civil society organisations observed ongoing misalignment and poor coordination among government departments responsible for climate action, especially between the DFFE, DMRE, and National Treasury. They believed this fragmentation hindered coherent implementation of the NDC and undermined public trust in the process.
  - 3) Cross-cutting principles of procedural, distributive, and restorative justice were emphasised. These principles ensure that decision-making processes are fair and inclusive, that resources are distributed equitably, and that historical injustices are addressed through targeted climate action. Embedding these justice dimensions provides a moral and practical framework for implementing climate policies that leave no one behind.
  - 4) There were strong calls for improved participation of grassroots groups, and for direct financial support to civil society organisations working at community level. Encouraging direct engagement and support for grassroots organisations ensures that local voices are heard and that community-driven initiatives receive the funding they need. This approach strengthens local capacity, enables more effective on-the-ground implementation, and supports a bottom-up dimension to the overall climate strategy, bridging national goals with community realities.
- Numerous groups raised concerns about the technical complexity and inaccessibility of climate policy documents and data. They felt that public understanding of the NDC could be significantly improved through plain-language summaries, visual materials, and educational outreach efforts — particularly in marginalised and linguistically diverse communities.

### **Specific actions/targets that should be included in the NDC**

Stakeholders proposed a range of specific interventions, targets, and policies that should be embedded within the NDC to ensure its effectiveness, fairness, and deliverability.

#### **Mitigation:**

- 1) Introduce immediate fossil fuel phase-out plans, including a ban on new exploration licences and enforceable decommissioning dates. This action calls for a swift end to the expansion of fossil fuel infrastructure while establishing clear timelines for shutting down existing facilities. Such plans would create certainty for investors, signal a strong commitment to the low-carbon pathway, and help ensure that the phase-out is legally binding and monitored through regular reviews.
- 2) Commit to full decarbonisation of electricity by 2040, supported by investment in storage, EV infrastructure, and green industrialisation. This target sets an ambitious yet necessary goal for the electricity sector, emphasizing the need for complementary investments in energy storage solutions, electric vehicle (EV) charging networks, and broader green industrial policies. By linking these elements together, the approach ensures that the transition to renewable energy is integrated, sustainable, and capable of supporting a modern, low-carbon economy.
- 3) Set zero-waste targets, including a national ban on the landfilling of organic waste. Establishing zero-waste targets requires comprehensive measures that go beyond recycling to eliminate the disposal of organic materials in landfills. This approach can

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drive innovation in waste management, promote composting and bioenergy opportunities, and contribute to reduced methane emissions, a potent greenhouse gas, thereby aligning environmental and circular economy goals.

- 4) Implement enforceable carbon budgets for high-emitting sectors and entities, linked to national and sectoral mitigation trajectories. Enforceable carbon budgets would require industries and major emitters to operate within predefined limits, with penalties for non-compliance. By linking these budgets to overall mitigation trajectories, this measure provides a clear, quantifiable framework for emissions reduction, incentivizes investment in low-carbon technologies, and ensures accountability at both the national and sector-specific levels.
- 5) Several groups expressed concern that companies might attempt to pass carbon pricing costs onto consumers, particularly affecting low-income households. They argued that corporate accountability measures should be built into the NDC to ensure that emitters bear the true cost of their emissions, rather than transferring the burden to the public.
- 6) There was a call for greater scrutiny of new infrastructure projects, with many stakeholders arguing that all new developments — particularly in the energy and transport sectors — should be assessed for compliance with the national carbon budget. Some suggested that this information be made public through a transparent emissions registry for new projects.

#### **Adaptation:**

- 1) Embed locally led risk and vulnerability assessments across rural and urban areas. This action emphasises the importance of bottom-up approaches in identifying local climate risks. Empowering communities to conduct their own risk assessments ensures that adaptation measures are accurately adapted to the diverse needs and challenges faced in different environments, from rural settlements to urban centres.
- 2) Prioritise disaster risk reduction, climate-proofing of health systems, and protection of strategic water source areas. By focusing on disaster risk reduction, adaptation measures would improve emergency preparedness and resilience in the face of extreme events. Climate-proofing health systems ensures that essential services remain operational during climate shocks, while safeguarding strategic water sources is critical for maintaining agriculture, human consumption, and ecosystem health under changing climatic conditions.
- 3) Develop and implement sector-specific adaptation strategies, including coastal protection, climate-smart agriculture, and urban heat mitigation. Specific strategies across sectors acknowledge the unique challenges each field faces. For coastal areas, this might involve seawalls or mangrove restoration; for agriculture, techniques like drought-resistant crops and precision irrigation; and for cities, urban greening and reflective building materials to reduce heat absorption, all of which contribute to a more resilient society.
- 4) Launch a large-scale public employment programme focused on ecosystem restoration and climate resilience. Such a programme would not only improve adaptation outcomes through activities like reforestation, wetland rehabilitation, and sustainable land management but also create job opportunities and build local



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capacity. This approach directly addresses social equity and economic inclusion, ensuring that vulnerable communities benefit from climate adaptation investments.

- 5) Civil society groups advocated for community-owned renewable energy initiatives and locally led nature-based adaptation strategies. They believed that these approaches are more responsive to local needs, create co-benefits such as jobs and biodiversity protection, and strengthen community resilience.

#### **Means of Implementation:**

- 1) Prioritise the expansion and modernisation of the national electricity transmission grid to enable renewable energy access. Modernising the grid is critical for integrating large-scale renewable energy projects into the national energy system. An upgraded transmission network improves reliability, supports decentralized renewable installations, and facilitates the efficient distribution of clean power to both urban and rural areas.
- 2) Promote decentralised energy production and community-level access to climate finance. Encouraging decentralised energy systems, such as mini-grids and rooftop solar installations, empowers communities by providing local energy solutions. Coupled with improved access to climate finance, these measures can drive local innovation, reduce energy poverty, and foster resilience at the community level by supporting small-scale projects and entrepreneurial initiatives.
- 3) Strengthen institutional capacity for policy alignment and interdepartmental coordination. Effective climate action relies on coherent policy frameworks and close cooperation among governmental departments. Building institutional capacity ensures that policies related to mitigation and adaptation are well-integrated, discrepancies are minimised, and that implementation is streamlined across sectors, resulting in a more unified national response.
- 4) Ensure gender-disaggregated data collection and embed inclusive monitoring and evaluation frameworks. Collecting gender-disaggregated data allows for a clearer understanding of how climate change impacts vary by gender, informing more equitable policy decisions. An inclusive monitoring and evaluation system ensures accountability, facilitates targeted interventions, and promotes transparency, so that all stakeholder groups can track progress and benefit from climate actions.

#### **Concerns regarding the NDC update**

Civil society stakeholders expressed a range of concerns relating to the ambition, feasibility, and justice of the NDC. Their feedback highlights risks associated with policy incoherence, exclusion, and implementation failures.

#### **Mitigation:**

- 1) Ongoing investment in fossil fuel infrastructure (coal, oil, gas) threatens to lock in high emissions and derail decarbonisation. Continuous capital allocation toward fossil fuel projects risks creating long-term dependencies on carbon-intensive energy sources. This entrenched infrastructure makes it harder to shift towards renewable alternatives, locking South Africa into a high-emissions trajectory and undermining efforts to achieve a timely and effective decarbonisation transition. Some

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stakeholders noted that planned or proposed infrastructure projects — particularly fossil fuel-related — may not be compatible with South Africa's overall decarbonisation trajectory, warning that without rigorous emissions controls and monitoring, these projects could cause the country to overshoot its carbon budget.

- 2) South Africa may face international trade penalties if mitigation ambitions do not align with global climate goals. A lack of ambitious, science-based mitigation measures could trigger trade restrictions or tariffs imposed by international partners and trading blocs. This misalignment with global climate standards not only jeopardises the country's economic competitiveness but may also hinder access to key export markets, affecting overall economic growth and international relationships.
- 3) Powerful vested interests in the fossil fuel sector continue to weaken or delay robust climate action. Influential stakeholders within the fossil fuel industry can shape policy debates, often resisting reforms that would accelerate the transition to renewable energy. Their influence may contribute to delays in adopting stronger climate regulations, resulting in slower progress towards reducing emissions and a less effective NDC overall.
- 4) There are concerns that green hydrogen development, if export-focused, may divert renewable energy away from local decarbonisation needs. While green hydrogen holds significant export potential, a strategy overly focused on international markets could lead to renewable energy capacity being allocated primarily for production aimed at exports. This may limit the renewable supply available for domestic use, thereby hindering local efforts to decarbonise critical infrastructure and energy systems.

#### **Adaptation:**

- 1) Adaptation remains under prioritised in policy and budget allocations. Despite growing climate risks, adaptation measures continue to receive insufficient attention and funding at both national and local levels. This underinvestment may leave vulnerable communities without adequate support to cope with slow onset impacts like drought or escalating extreme events, undermining the overall resilience of the country.
- 2) Weak local government capacity, particularly in rural areas, undermines effective adaptation implementation. Limited resources, technical expertise, and institutional support at the local government level hinder the execution of adaptation plans. Rural areas, which are often the most affected by climate impacts, may experience delays or gaps in crucial initiatives, reducing the overall effectiveness of adaptation strategies and deepening vulnerabilities.
- 1) Stakeholders called for greater attention to the mental health and social wellbeing impacts of climate change, especially in disaster-affected communities. Beyond physical and economic effects, the stress and trauma associated with climate disasters can have profound implications for mental health and community cohesion. Recognising these social dimensions is critical for designing comprehensive adaptation strategies that include support services, community outreach, and psychosocial interventions to help affected populations recover and build resilience.
- 2) There was concern that adaptation planning continues to be top-down and technocratic, often failing to meaningfully include the perspectives of Indigenous

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communities and other marginalised groups. Participants argued that this exclusion undermines the effectiveness and legitimacy of national adaptation strategies.

### **Means of Implementation:**

- 1) Stakeholders expressed frustration over policy incoherence and conflicting mandates, especially between departments such as DMRE and DFFE. Inconsistent policies and overlapping responsibilities between key government departments lead to confusion and inefficient resource allocation. This fragmentation can stall the implementation of the NDC, as conflicting priorities prevent the development of a unified strategy that fully supports both mitigation and adaptation efforts.
- 2) There is concern that the NDC may again become a “paper ambition,” lacking the means, systems, or will for delivery. Without robust implementation frameworks, clear accountability mechanisms, and sufficient political commitment, the NDC risks remaining a set of targets on paper. This concern underscores the need for comprehensive, actionable delivery plans that translate ambition into measurable progress on the ground.
- 3) Climate policies risk excluding marginalised groups, including people with disabilities, informal workers, and youth. The design and implementation of climate policies may inadvertently overlook the needs of those who are most vulnerable and least represented. Ensuring inclusive participation and specific support measures is crucial to prevent the marginalisation of these groups and to promote equitable outcomes throughout the transition process.
- 4) Shrinking access to international climate finance and South Africa's rising debt burden pose risks to NDC affordability and delivery. As global financial conditions tighten and South Africa's debt levels increase, securing affordable financing for climate initiatives becomes increasingly challenging. This financial strain could undermine the country's ability to mobilize the necessary resources to implement the NDC, potentially delaying critical climate action and eroding investor confidence.
- 5) Civil society organisations were deeply frustrated by the lack of clarity around climate finance flows, including where funds originate, how they are allocated, and who ultimately benefits. They believed that annual disclosures of climate finance allocation and expenditure would improve public trust and accountability.

### **Faith**

Faith-based stakeholder engagements provided unique and values-driven perspectives on the development and implementation of South Africa's updated NDC. Participants emphasised the importance of stewardship, intergenerational responsibility, and moral leadership in responding to the climate crisis.

The discussions highlighted the need for both practical actions and deeper societal transformation, guided by spiritual and ethical imperatives. Faith-based groups also underscored the value of community mobilisation, education, and solidarity in achieving climate resilience. The perspectives below are categorised according to the three central consultation questions, and further organised by Mitigation, Adaptation, and Means of Implementation (MOI).

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## Criteria to be followed in developing the NDC

The points below reflect faith-based perspectives on the foundational principles and ethical considerations that should inform the development of South Africa's updated NDC.

### **Mitigation:**

- 1) The NDC should uphold the moral imperative to reduce emissions for the sake of future generations, prioritising long-term environmental sustainability over short-term profit. This perspective emphasises that our collective duty to future generations demands urgent action on emissions. It calls for policies that transcend immediate economic gains, ensuring that environmental sustainability is embedded in every decision-making process to protect the planet for those who will inherit it.
- 2) Mitigation should be guided by a faith-based understanding of stewardship, protecting creation as a spiritual responsibility. This view stresses that caring for the Earth is not only an environmental or economic issue but also a spiritual duty. It encourages decision-makers to view natural resources as a sacred trust, which must be managed responsibly and compassionately, reflecting a deep commitment to preserving creation for the common good.
- 3) There was an emphasis on ensuring that climate policies reflect shared moral values, including justice, compassion, and responsibility to the vulnerable. Faith communities advocate for climate actions that are not only scientifically sound but also ethically grounded. This means that policies must uphold principles of fairness and empathy, ensuring that the burdens and benefits of climate action are distributed equitably, and that those most at risk are given special consideration and protection.
- 4) Faith-based stakeholders strongly emphasised the need for increased access to climate science and mitigation education and literacy. This call was consistently expressed across both the capacity building and formal consultation sessions, reflecting a desire to deepen understanding and enable more informed participation in climate decision-making processes.

### **Adaptation:**

- 1) The NDC should support community-level adaptation rooted in faith-based values such as care, solidarity, and resilience. This highlights the importance of adopting adaptation measures that resonate with the core values of many faith traditions. By empowering local communities to build resilience through mutually supportive initiatives and shared responsibilities, adaptation efforts can foster deeper social cohesion and collective action in the face of climate challenges.
- 2) Faith-based stakeholders also emphasised the critical role of their organisations during extreme climate events, noting their capacity to open facilities, mobilise support, and collaborate with local municipalities to assist affected communities. This positions faith groups not only as moral stewards but as practical partners in frontline disaster response and recovery.
- 3) Education on climate adaptation should be paired with spiritual and cultural teachings, especially in marginalised and rural communities. Integrating climate adaptation education with faith-based and cultural narratives can make the information more accessible and meaningful. This approach encourages communities to view climate resilience as part of their cultural identity and spiritual

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practice, thereby enhancing engagement and long-term commitment to sustainable practices.

- 4) There was strong support for prioritising vulnerable populations, including the elderly, children, and the poor, in adaptation planning. Faith perspectives underscore a profound commitment to protecting those who are most at risk. By making vulnerable groups a central focus in adaptation strategies, the NDC can ensure that support measures, such as enhanced social services, targeted infrastructure improvements, and community aid programs, are designed to lift those who are least able to cope with climate impacts.

#### **5) Means of Implementation:**

- 6) Faith leaders called for the NDC to include clear commitments to inclusivity, ensuring the participation of faith communities in climate dialogue and policy implementation. Inclusivity is seen as fundamental, with faith communities urged to be active partners rather than passive observers. By embedding structured, ongoing engagement mechanisms, the NDC can harness the collective wisdom, moral authority, and grassroots networks of diverse religious groups to strengthen climate action.
- 7) The NDC must be accessible and understandable to the public, communication and outreach should be grounded in language and values that resonate with communities of faith. Effective communication is critical for broad public buy-in. This involves using clear, relatable language, storytelling, and culturally familiar references that align with the shared values of faith communities, ensuring that climate policies are not only technically robust but also widely embraced.
- 8) Faith-based groups encouraged collaboration between government, civil society, and religious institutions to build climate action capacity. Recognising that collective strength is greater than individual efforts, faith stakeholders call for multi-sectoral partnerships that leverage the resources, networks, and trust inherent in religious institutions. This collaboration can boost capacity building, facilitate grassroots mobilization, and ensure that climate initiatives are both socially inclusive and ethically driven.

### **Specific actions/targets that should be included in the NDC**

Faith-based organisations proposed practical and symbolic interventions that could be included in the NDC, particularly around education, environmental awareness, and intergenerational action.

#### **Mitigation:**

- 1) Encourage the promotion of clean energy adoption within places of worship, religious schools, and community facilities. This action calls for faith institutions to lead by example by installing solar panels, energy-efficient lighting, and other renewable energy systems on their buildings. By demonstrating the benefits of clean energy, these institutions can serve as living laboratories that inspire congregations and the broader community to adopt sustainable practices, thereby reducing the overall carbon footprint while reinforcing a culture of environmental stewardship.
- 2) Promote tree planting, waste reduction, and other visible local actions that connect congregations with climate responsibility. Organising activities such as community tree planting days, recycling drives, and clean-up events encourages congregants

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to engage actively in environmental preservation. These hands-on initiatives not only improve local environmental quality but also symbolically connect spiritual values with practical actions, fostering a sense of collective responsibility and accountability for the care of creation.

- 3) Raise awareness through faith-aligned environmental campaigns, especially those that link climate action to moral teachings and scriptural principles. Faith-based campaigns should use sermons, workshops, media outreach, and community events to highlight the moral imperative of protecting the environment. By drawing on scriptural narratives and ethical principles such as justice, compassion, and stewardship, these campaigns can motivate individuals to adopt climate-friendly practices and support policies that advance sustainable development.

### **Adaptation:**

- 1) Launch community-led workshops on disaster preparedness, water conservation, and sustainable living especially in rural and under-resourced areas. Workshops for local communities can provide practical skills for managing climate risks, from emergency response to efficient water use and sustainable daily practices. Faith organisations, trusted as community anchors, are well positioned to facilitate these sessions, ensuring that vulnerable populations receive both technical knowledge and culturally relevant guidance to build resilience against climate impacts.
- 2) Integrate climate adaptation into existing community service programmes, such as feeding schemes, housing support, and pastoral care. Embedding adaptation practices within established social service programmes ensures that climate resilience becomes part of holistic community support. For example, integrating sustainable food practices into feeding schemes or retrofitting housing to withstand extreme weather can provide dual benefits, improve everyday quality of life while simultaneously prepare communities for future climatic challenges.
- 3) Establish or support "green congregation" initiatives that model sustainability practices at the local level and share learnings with other communities. "Green congregations" adopt a suite of sustainability measures, such as energy conservation, waste reduction, and environmentally responsible procurement, as part of their regular operations. These initiatives can serve as practical examples of sustainable living, helping to build networks among faith communities that share best practices and collectively push for broader societal change toward climate resilience.

### **Means of Implementation:**

- 1) Allocate funding for faith-based climate education programmes, including curriculum development and youth leadership training. Dedicated financial support for climate education within faith communities will enable the development of curricula that integrate environmental stewardship with spiritual teachings. Furthermore, investing in youth leadership programs will empower the next generation of faith leaders to promote climate action, ensuring a sustained and intergenerational commitment to sustainability.
- 2) Develop national platforms that enable collaboration between faith networks and government on climate change planning and monitoring. Creating formal channels for dialogue and collaboration will bring together faith communities and



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government agencies, fostering partnerships that can share local insights, co-create policy solutions, and establish joint monitoring frameworks. Such platforms will help ensure that climate strategies are inclusive, comprehensive, and reflective of community-level realities.

- 3) Include faith leaders in decision-making forums, recognising their influence and potential in mobilising grassroots support for NDC goals. Actively involving faith leaders in policy and decision-making processes ensures that the moral and social dimensions of climate change are fully represented. Their participation can help bridge the gap between national policy and community practice, leveraging their significant influence to mobilise grassroots support and drive the successful implementation of the NDC at all levels.

### Concerns regarding the NDC update

Faith-based participants raised concerns related to moral accountability, social equity, and the spiritual cost of inaction on climate change. Their reflections highlighted both practical and ethical risks associated with failing to implement a just and inclusive NDC.

#### **Mitigation:**

- 1) There was concern that economic interests may continue to undermine urgent mitigation action, placing short-term gains above the welfare of people and the planet. This worry reflects the belief that profit motives and market-driven priorities can sideline the transformative policies needed to achieve meaningful emissions reductions. Faith stakeholders stress that when economic benefits are given precedence over environmental and social wellbeing, it undermines the collective moral responsibility to safeguard creation for all, particularly the most vulnerable.
- 2) Faith leaders warned of the erosion of intergenerational justice, stressing that the consequences of weak mitigation would be borne by future generations. This concern highlights a deep sense of moral urgency where current inaction or ineffective policies risk imposing severe environmental, social, and economic burdens on children and future generations. It calls for immediate, principled action that prioritizes long-term justice over short-term expediency to ensure that the legacy left to coming generations is one of care and sustainability.
- 3) A lack of community-level communication about the NDC and mitigation targets risks disconnecting the public from national climate commitments. When efforts to reduce emissions are not communicated effectively at the local level, communities may feel excluded from decision-making processes and unaware of how national targets affect their daily lives. Faith stakeholders argue that inclusive, relatable communication strategies should be employed to ensure that community members understand, engage with, and take ownership of climate action initiatives.

#### **Adaptation:**

- 1) Participants expressed concern that adaptation efforts are not visible at local level and are failing to build true community resilience. This concern underscores that without tangible, on-the-ground adaptation measures, local communities remain exposed to climate risks and may not experience the intended benefits of national strategies. Faith-based voices emphasize the need for adaptation actions to be

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both visible and impactful, ensuring that resilience is actively built into community practices, infrastructure, and social services.

- 2) The exclusion of faith-based organisations from adaptation planning risks missing opportunities to reach and empower vulnerable populations. Faith stakeholders believe that religious institutions often serve as trusted community anchors, especially in marginalized areas. Leaving these organisations out of the planning process can result in the loss of valuable perspectives and local engagement strategies that are vital to effectively empowering vulnerable populations and ensuring that adaptation measures are inclusive and culturally resonant.
- 3) There were also concerns about the capacity of local institutions including churches and religious NGOs to support adaptation without additional training and funding. While faith-based organisations are well-placed to drive community resilience, many currently lack the necessary resources, expertise, or financial support to fully contribute to adaptation efforts. Stakeholders call for targeted capacity-building initiatives and funding to equip these institutions with the tools needed to implement, manage, and sustain effective adaptation programmes that benefit their communities.

#### **Means of Implementation:**

- 1) Concerns were raised about the lack of coordinated communication strategies to engage communities in the NDC process. Faith voices warn that without integrated and culturally sensitive outreach, climate policies may fail to resonate with local populations. This lack of coordination can lead to misinformation or apathy, undermining the goal of achieving wide-ranging public participation and trust in the NDC's objectives and actions.
- 2) There was frustration over minimal recognition of the role of faith institutions as trusted, embedded community actors. Faith stakeholders point out that religious organisations have long-standing relationships with communities, providing both spiritual guidance and practical support. Their expertise, networks, and influence are critical for disseminating information and galvanising local action, yet their potential is often underutilised in national implementation strategies.
- 3) Stakeholders emphasised the risk that communities may be overlooked or misinformed if the NDC remains technocratic and inaccessible in language and format. The tendency of policy documents to use technical jargon and abstract language can create a disconnect between policymakers and the public. Faith leaders stress the importance of simplifying language, ensuring inclusivity, and adapting messages to diverse cultural contexts so that all community members can understand, participate in, and benefit from the climate action process.

## **Youth**

Youth stakeholder engagements brought forward a combination of passionate advocacy, practical insights, and critical reflection on the current and future impacts of climate change. Young participants emphasised their stake in long-term climate outcomes and expressed concern that current decision-making processes often

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exclude youth voices and fail to reflect intergenerational equity. Many advocated for bold, actionable policies that reflect both the urgency of the climate crisis, and the aspirations of a generation determined to shape a sustainable and just future. The perspectives below are categorised according to the three central consultation questions, and further organised by Mitigation, Adaptation, and Means of Implementation (MOI).

## Criteria to be followed in developing the NDC

The points below reflect youth perspectives on the foundational principles and strategic considerations that should guide the development of South Africa's updated NDC.

### Mitigation:

- 1) The NDC must be guided by a long-term vision of intergenerational justice, ensuring that today's decisions do not compromise the future of youth and children. This principle emphasises that current policy choices must safeguard the rights and wellbeing of future generations. Youth stakeholders call for a framework that not only addresses immediate emissions reductions but also sets in place enduring safeguards ensuring that the environmental legacy left for youth is sustainable, equitable, and resilient against future climate challenges.
- 2) Youth participants called for an ambitious but realistic implementation plan, with concrete timelines and sectoral targets that are science-based and enforceable. To build trust and accountability, youth stress that the NDC should not only outline aspirational goals but also detail actionable steps supported by robust scientific data. Clear timelines, sector-specific targets, and enforceable policies are seen as essential to drive meaningful change and ensure that mitigation efforts translate into measurable progress over time.
- 3) The Climate Change Act and other mitigation instruments must hold polluting industries legally accountable and require detailed mitigation plans. Youth advocates insist on the necessity of a strong regulatory framework that can compel industries to adhere to strict emission limits. They argue that embedding legal accountability mechanisms will help curb the influence of polluting sectors and guarantee that those generating high levels of emissions are required to develop and execute comprehensive, transparent mitigation strategies.
- 4) There was strong advocacy for clear, transparent implementation strategies, rather than high-level ambition alone. Youth stakeholders highlight that ambitious goals are only effective if accompanied by detailed, operational plans. They call for the inclusion of specific strategies, reporting standards, and accountability measures that enable continuous monitoring and public oversight, thereby ensuring that each step of the climate transition is both tangible and trackable.
- 5) The NDC must acknowledge and plan for transitional or intermediate fuels, such as natural gas, particularly in light of South Africa's limited biomass resources. While these fuels are not the ultimate solution, youth participants argued they can serve as bridge options toward a fully decarbonised future, provided clear phase-out timelines and accountability measures are established.

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- 6) Youth participants highlighted that nuclear energy could be part of the country's low-carbon mix, pointing out its potential for large-scale, reliable baseload power and reduced reliance on fossil fuels.

### **Adaptation:**

- 1) Adaptation efforts should be rooted in local realities, especially in communities already experiencing the brunt of climate impacts. Youth emphasise that adaptation strategies must be specific to the specific needs and vulnerabilities of local communities. By grounding plans in the lived realities of those most affected, policies can ensure that responses are practical, context-driven, and effective in addressing challenges such as water scarcity, extreme weather events, and other local climate hazards.
- 2) Youth emphasised the need to integrate child rights governance and the wellbeing of vulnerable groups, including women, into adaptation planning. Child rights and women's rights were frequently mentioned together, reflecting the importance of addressing gender equality and instituting gender mainstreaming as core elements of resilience-building. This perspective insists that adaptation strategies should prioritise the protection of vulnerable populations—particularly children, who are often disproportionately affected by climate impacts—while ensuring that women's rights are safeguarded and advanced. By weaving these considerations into policy frameworks, adaptation measures can promote equitable outcomes and strengthen the resilience of marginalised groups across the board.
- 3) Participants supported the idea of "green villages" as models for sustainable, climate-resilient development in rural and peri-urban areas. "Green villages" are envisioned as community-led hubs that combine renewable energy, sustainable agriculture, and resilience-building infrastructure. Youth see these initiatives as a way to foster local innovation and create replicable models of climate adaptation that empower communities to address their own environmental challenges while promoting economic and social development.
- 4) Adaptation was viewed as a critical way to safeguard basic services such as housing, water, and sanitation which are already under pressure in many communities. Youth stakeholders stress that robust adaptation measures are essential to protect essential services that form the backbone of community wellbeing. By prioritising initiatives that enhance the resilience of housing, water supplies, and sanitation infrastructure, adaptation efforts can reduce the risk of service disruptions during climate-related events and improve the overall quality of life for vulnerable populations.

### **Means of Implementation:**

- 1) Youth stakeholders called for clear and measurable roles and responsibilities for each actor involved in NDC implementation, following the SMART goals model. Establishing specific, measurable, achievable, relevant, and time-bound (SMART) targets for all stakeholders ensures accountability and clarity in the implementation process. Youth demand that each government agency, private sector entity, and community organization has a defined role, with transparent performance indicators and regular reporting intervals to track progress.

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- 2) There was a strong demand for a dedicated local climate finance mechanism that enables community-level responses to climate impacts. Youth emphasise that for climate action to be effective, financial support must reach local communities directly. A dedicated local finance mechanism would facilitate the mobilisation of resources, ensuring that community-led projects receive the necessary funding to implement innovative adaptation and mitigation solutions designed to their specific needs.
  - 3) The importance of strengthening Monitoring & Evaluation frameworks was highlighted, particularly to support data access and transparency. Monitoring & Evaluation (M&E) frameworks are seen as critical for ensuring that progress is accurately tracked and that policy adjustments can be made in a timely manner. Youth stakeholders advocate for systems that provide accessible data, transparent methodologies, and regular feedback loops to maintain accountability and help drive continuous improvement throughout the NDC implementation process.
  - 4) Participants urged for youth inclusion in climate governance, both in rural and urban settings, as a non-negotiable element of just implementation. Recognising that young people are disproportionately affected by climate change, youth stakeholders insist on their meaningful participation in decision-making processes. Involving youth representatives in governance structures ensures that policy decisions reflect the diverse perspectives and innovative ideas of the next generation, thereby facilitating more dynamic, forward-thinking, and inclusive climate action at all levels.

### **Specific actions/targets that should be included in the NDC**

Youth participants proposed a wide range of interventions that reflect both systemic change and community-based action. Their proposals reflect an intersectional approach to climate justice and sustainability.

#### **Mitigation:**

- 1) The NDC should enforce the Climate Change Act by requiring companies to submit mitigation plans, allocate carbon budgets, and phase out fossil fuel use. This measure would institutionalise accountability by mandating that companies provide detailed plans to reduce emissions and set legally binding carbon budgets. It would create a clear framework for transitioning away from fossil fuels, ensuring that the private sector is aligned with national climate goals while encouraging innovation and long-term investment in cleaner technologies.
- 2) Targets should include emissions reductions across energy, agriculture, and transport sectors, with a focus on reducing greenhouse gases such as CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O. By specifying reduction targets for key sectors, the NDC can address the diverse sources of emissions within the economy. Focusing on a range of greenhouse gases ensures that mitigation efforts are comprehensive, leveraging sector-specific strategies, from shifting agricultural practices to sustainable transport solutions, to achieve overall climate objectives.

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- 3) Promote a rapid shift to renewable energy, energy efficiency, and sustainable land management. This action calls for aggressive policies that accelerate the adoption of renewable technologies, upgrade energy systems for greater efficiency, and implement sustainable land practices. A rapid transition in these areas is vital not only for cutting emissions but also for creating new economic opportunities and reducing reliance on imported fossil fuels.
  - 4) Ensure carbon reduction efforts are tied to educational campaigns so that young people understand and can participate in mitigation. Integrating education with mitigation initiatives will empower youth by building awareness and fostering climate literacy. These educational campaigns can help young people grasp the importance of reducing emissions, encourage behaviour change, and mobilize community-driven actions, ultimately ensuring that mitigation is a shared responsibility with long-lasting societal impact.
  - 5) Strengthen grid stability measures to manage the rapid expansion of solar and wind. This includes modern grid infrastructure, potential upgrades for dispatchable power sources, and storage solutions to handle variable renewable generation.

#### **Adaptation:**

- 1) Introduce and scale up “green villages” and other localised adaptation models that promote resilience and sustainability. “Green villages” serve as community-led exemplars for integrating renewable energy, sustainable agriculture, and resilient infrastructure. Scaling up these models can provide a replicable framework for enhancing local adaptive capacity while demonstrating the direct benefits of climate resilience practices in both rural and peri-urban areas.
- 2) Implement community-specific strategies such as seawalls and mangrove restoration in coastal areas, and green infrastructure in urban zones. Specific adaptation strategies ensure that diverse local challenges are directly addressed. For coastal communities, investments in seawalls and mangrove restoration can protect against sea-level rise and storm surges, while urban green infrastructure, such as tree planting and permeable pavements, can mitigate heat island effects and improve stormwater management.
- 3) Involve youth in the development of disaster risk management plans, especially in vulnerable regions. Including young people in disaster planning not only leverages their innovative ideas and local knowledge but also builds long-term leadership in resilience. Their active participation can ensure that risk management plans are dynamic, inclusive, and reflective of emerging challenges while fostering a sense of ownership and readiness for future events.
- 4) Promote climate-smart agriculture and support farmers with drought-resistant crops and efficient irrigation systems. Climate-smart agricultural practices are critical to enhancing food security and resilience. By providing farmers with drought-resistant crop varieties and modern, efficient irrigation systems, the NDC can help secure agricultural productivity despite adverse climate impacts, ensuring sustainable livelihoods and strengthening rural economies.

#### **Means of Implementation:**



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- 1) Invest in climate education and skill-building programmes to prepare young people for jobs in the green economy. Focused investments in education and vocational training can equip youth with the necessary skills to thrive in emerging green industries. These programmes should cover a range of topics, from renewable energy technology to sustainable agriculture practices, and foster a workforce that is capable of driving the country's transition to a low-carbon economy.
  - 2) Expand funding mechanisms to support youth-led climate initiatives and innovation hubs. Establishing dedicated funding channels for youth-driven projects and innovation centres will promote grassroots climate action and entrepreneurship. Such mechanisms can provide seed capital, mentorship, and technical support, ensuring that promising local solutions have the resources to scale and contribute to national climate objectives.
  - 3) Use inclusive monitoring tools to track gender, age, and location-specific progress. Transparent and comprehensive monitoring frameworks are essential for assessing the impact of climate actions at multiple levels. By collecting disaggregated data, policymakers can better understand how different communities, particularly youth, are benefiting from or being challenged by adaptation and mitigation measures, ensuring that interventions are equitable and targeted.
  - 4) Promote regionally coordinated finance strategies, including within the SADC region, to reduce cross-border pollution and promote regional resilience. Regional coordination on climate finance can streamline investments, share best practices, and ensure that initiatives are not working at cross purposes across borders. By aligning finance strategies with local and regional priorities, the NDC can foster collaborative projects that enhance resilience, drive sustainable development, and address pollution holistically across the region.

### Concerns regarding the NDC update

Youth stakeholders voiced deep concerns about the ambition, inclusivity, and practicality of the current NDC approach. Their feedback highlighted risks of exclusion, inadequate resourcing, and a disconnect between policy and lived experience.

#### **Mitigation:**

- 1) Many participants feared that the NDC might remain too abstract or ambitious without implementation clarity. This concern reflects the worry that targets and general visions could fail to translate into practical, on-the-ground actions. Without a detailed roadmap, including step-by-step implementation plans, resource allocations, and clear performance indicators, there is a risk that the NDC's goals will remain unfulfilled, reducing public confidence and slowing progress.
- 2) Concern was raised over continued fossil fuel dependency and the lack of enforceable accountability measures for major polluters. Youth stakeholders stress that persistent reliance on fossil fuels undermines national efforts to decarbonise the economy. The absence of strict, enforceable mechanisms, such as legally binding carbon budgets and penalties for non-compliance, may allow powerful polluting

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industries to delay the transition, perpetuating high emissions and putting future environmental and economic stability at risk.

- 3) Participants felt that the education system is not adequately preparing youth for future green jobs. This concern underscores a critical gap in current curricula and training programs, which do not sufficiently emphasize the skills needed for emerging sectors like renewable energy, sustainable agriculture, and green technology. Without targeted educational reforms and vocational training opportunities, young people may find themselves unprepared for the green economy, hindering both personal advancement and broader national transformation.
- 4) There was concern that ambition without strategy could produce unattainable targets and erode trust in climate governance. A focus solely on high-level goals, without concrete strategies, timelines, and accountability measures, risks setting unrealistic targets that might not be met. This disconnect can lead to public disillusionment and scepticism about the government's ability to manage climate action effectively, ultimately undermining both domestic support and international credibility.

**Adaptation:**

- 1) Youth expressed concern about slow progress on adaptation measures, especially in informal settlements and flood-prone areas. The slow pace of implementation in areas that are highly vulnerable to climate impacts indicates that current policies may not be adequately addressing local needs. This delay not only leaves communities exposed to hazards such as flooding but also undermines broader efforts to build resilience at the grassroots level, thereby increasing the risk of severe social and economic disruption.
- 2) Many worried that rural and vulnerable communities remain marginalised in climate dialogues and planning. There is a perception that national adaptation strategies often overlook the unique challenges faced by rural areas and under-resourced communities. By not actively including these voices in planning processes, policies may fail to address key issues such as limited access to resources, lack of infrastructure, and insufficient local capacity, resulting in solutions that are disconnected from the real needs of these populations.
- 3) There was frustration that adaptation is often secondary to mitigation in both funding and policy emphasis. Youth stakeholders note that mitigation efforts tend to receive the lion's share of attention and resources, even though adaptation is equally critical for safeguarding communities against existing climate risks. This imbalance can leave adaptation underfunded, making it difficult for communities to develop effective strategies to withstand long-term impacts, such as drought or sea-level rise.
- 4) Climate education, including around adaptation, is not reaching grassroots levels, making engagement and action difficult. The failure to communicate adaptation strategies in accessible ways means that vital knowledge and skills do not cascade to those most affected by climate change. Without educational initiatives adapted to local languages and contexts, communities remain uninformed about how to prepare for and respond to climate risks, hindering proactive engagement and limiting overall resilience.

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### Means of Implementation:

- 1) A major concern was the absence of localised climate finance access, particularly for youth and community groups. Without dedicated financing mechanisms that are accessible at the community level, it becomes challenging for local groups to initiate or scale up climate initiatives. Youth stakeholders argue that regional and local funding streams are essential to empower community-led projects, which can drive immediate action and create specific solutions to local climate challenges.
- 2) Participants questioned whether there is sufficient capacity and political will to deliver the NDC in a way that includes and empowers young people. Youth remain sceptical about the ability of current institutional frameworks to engage and support their involvement in climate governance. This concern points to potential gaps in both the technical expertise and the political commitment needed to implement policies that are inclusive, ensuring that young people are not only consulted but also actively contributing to the planning and execution of the NDC.
- 3) Several participants noted the lack of coordination across departments and between national and local government. A fragmented approach to climate action can lead to inefficiencies, duplicated efforts, and misaligned priorities. Youth stakeholders worry that without robust coordination mechanisms, disparate initiatives may fail to synergise, resulting in wasted resources and inconsistent implementation that undermines the overall effectiveness of the NDC.
- 4) Youth highlighted the need for a robust system to monitor NDC delivery and ensure accountability, including youth participation in oversight. Effective monitoring and evaluation frameworks are crucial to verify progress and hold implementers accountable. Youth insist that such systems must include clear metrics, regular reporting, and active youth involvement in oversight processes. This ensures transparency, builds public trust, and creates opportunities for feedback that can refine and improve policy implementation over time.

### Labour

Engagements with organised labour partners reflected deep concerns around job security, policy alignment, and the tangible implementation of a just transition. Although the labour stakeholders have showed their support of South Africa's updated NDC, they expressed their concerns regarding the necessity of having an ambitious target rather than a realistic target and voiced their frustration that existing policy frameworks and transition plans have yet to deliver results for workers and affected communities.

Key themes included the urgent need for skills development, inclusive planning, and alignment between national climate targets and workplace realities. Labour emphasised that no worker or community should be left behind in the shift to a low-carbon economy. The perspectives below are categorised according to the three central consultation questions, and further organised by Mitigation, Adaptation, and Means of Implementation (MOI).

### Criteria to be followed in developing the NDC

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The points below reflect labour perspectives on the values and policy principles that should guide the development of South Africa's updated NDC.

### **Mitigation:**

- 1) The NDC must reflect the highest possible ambition, grounded in South Africa's development needs and international obligations. This means that climate goals should be both aspirational and realistic, taking into account South Africa's economic priorities, social development targets, and its commitments under international agreements. By establishing clear, transformative targets, the NDC can drive the necessary structural changes while ensuring that the nation's developmental trajectory is not compromised.
- 2) Mitigation must be aligned with industrial policy to safeguard existing jobs and support the emergence of new, low-carbon industries. A key focus is ensuring that the transition from high-carbon to low-carbon industries does not result in abrupt job losses. Policies should be designed to facilitate a gradual shift in industrial activity, integrating workforce development and business innovation plans. This alignment helps to safeguard current employment while promoting new opportunities in sectors such as renewable energy, energy efficiency, and green technologies.
- 3) Labour called for clear, sector-specific emissions targets developed in consultation with affected workers and unions. Involving workers and unions in the formulation of emissions targets ensures that the challenges faced by high-emitting sectors are clearly understood and addressed. Such collaboration can lead to practical, enforceable targets that reflect on-the-ground realities and provide a framework for a just and orderly transition, protecting workers' interests throughout the process.
- 4) There was a call for mitigation pathways that are socially inclusive, protecting workers in high-emitting sectors from sudden disruption. Social inclusion in mitigation strategies is crucial for a just transition. This implies developing gradual phase-out measures, retraining programmes, and support systems that enable affected workers to adapt to new roles without severe economic or social hardship. Ensuring that every sector has robust support mechanisms helps to maintain stability while transitioning towards a low-carbon economy.
- 5) Labour stakeholders strongly advocated against the privatisation of essential services, particularly in the energy sector, cautioning that such shifts could exacerbate job losses and undermine employment security. Retaining public ownership is critical for ensuring that the transition is reasonable and job-focused, with the government better positioned to uphold labour protections and inclusive employment practices during structural changes.

### **Adaptation:**

- 1) Labour stakeholders emphasised the need for an equitable and transparent approach to adaptation, prioritising vulnerable workers and rural communities. This approach entails designing adaptation strategies that are accountable and fair, ensuring that the unique needs of vulnerable and often under-resourced communities are met. Transparent processes in allocating resources and measuring outcomes are essential for building trust, while the focus on vulnerable workers

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ensures that those most affected by climate impacts receive the necessary support to build resilience.

- 2) Adaptation planning should be guided by principles of solidarity and fairness, ensuring no segment of society is left behind. Incorporating solidarity into adaptation efforts requires that plans be developed through inclusive consultations with communities and labour organisations. This helps to guarantee that adaptation measures address systemic inequities by designing interventions that protect the livelihood and wellbeing of all, especially those in economically marginalized positions.
- 3) Proactive engagement with local labour representatives is needed to integrate workplace resilience and community adaptation measures. By directly involving local labour leaders in adaptation planning, the NDC can ensure that workplace considerations, such as safe working environments and job security during climate disruptions, are incorporated into broader community strategies. This proactive engagement creates a feedback loop that strengthens both workplace resilience and community-level adaptation efforts.

### **Means of Implementation:**

- 1) Labour called for policy alignment and coherence, citing persistent contradictions between climate goals and other government mandates. Policy alignment is essential to ensure that climate action is not undermined by conflicting economic or industrial directives. Creating a cohesive framework involves synchronising climate, industrial, and social policies, thereby ensuring consistent and mutually reinforcing strategies that allow for a smoother implementation process across all government levels.
- 2) There was strong emphasis on the need for inclusive consultation structures, including formal representation of labour in NDC planning and review mechanisms. To ensure that the perspectives of workers and unions are properly integrated into decision-making, formal channels must be established that allow for continuous input from the labour sector. This inclusive consultation framework not only fosters transparency and accountability but also guarantees that labour concerns are addressed throughout the planning, implementation, and review phases of the NDC.
- 3) Stakeholders highlighted the importance of accessible information to empower workers and unions to participate meaningfully in climate governance. Accessible, clear, and regularly updated information is crucial for enabling workers and unions to engage fully in the climate dialogue. Tools such as simplified reports, clear performance indicators, and open data platforms ensure that all stakeholders can assess progress, hold implementers accountable, and contribute to ongoing policy adjustments.
- 4) The NDC must prioritise skills development and include dedicated plans for upskilling and reskilling workers. To mitigate the risks of job displacement in high-emitting sectors, the NDC should incorporate comprehensive training programmes and vocational initiatives. These plans must be modified to current and future industry needs, ensuring that workers are equipped with the necessary skills to transition into emerging green sectors. This strategy not only supports economic resilience but also

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reinforces a just transition by ensuring continuous employment opportunities throughout the climate response process.

### **Specific actions/targets that should be included in the NDC**

Labour stakeholders proposed specific measures to enhance the justice, work-readiness, and practicality of the NDC. These actions reflect a focus on employment preservation, economic restructuring, and capacity building.

#### **Mitigation:**

- 1) Introduce sectoral just transition plans with clear emissions targets, timelines, and social protection mechanisms. This involves developing detailed transition plans for each high-emitting sector that not only establish measurable emissions reduction targets and specific deadlines but also include robust social protection measures. Such plans should cover retraining programmes, income support, and stakeholder consultation processes to ensure that workers are adequately protected during the shift to a low-carbon economy.
- 2) Ensure local content targets and industrial development plans are embedded in the energy transition to promote decent work and job creation. Embedding local content targets means prioritizing procurement from local suppliers and developing indigenous manufacturing capacities within the energy sector. This approach supports the growth of domestic industries, creates quality jobs, and strengthens economic resilience by ensuring that the benefits of the energy transition remain in South Africa and contribute to broader industrial development.
- 3) Promote green manufacturing and localisation of clean technologies, including wind turbines, solar panels, and electric vehicles. This action calls for policies that support the development and production of renewable energy technologies domestically. By incentivising green manufacturing through tax breaks, subsidies, or public-private partnerships, the NDC can help local companies become competitive on a global stage, while simultaneously boosting employment in emerging green sectors and reducing reliance on imported technology.
- 4) Prioritise public sector leadership in mitigation projects, ensuring that new industries are worker-centred and labour-intensive where possible. Public sector-led initiatives can set high standards for social inclusion and operational transparency. This means that government projects should be designed to not only achieve emissions reductions but also to demonstrate best practices in creating worker-focused, labour-intensive operations. Such initiatives can serve as benchmarks for the private sector, ensuring that the energy transition contributes to broad-based economic development and job creation.

#### **Adaptation:**

- 1) Develop worker-focused adaptation strategies, including job protection policies in climate-vulnerable sectors such as agriculture and tourism. This requires creating adaptation plans that directly address the risks faced by workers in sectors where climate impacts are most pronounced. Strategies should include measures to safeguard employment, such as wage subsidies, retraining programmes, and job



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security guarantees, in industries that are vulnerable to disruptions from climate events, thereby protecting livelihoods while enhancing community resilience.

- 2) Invest in adaptation infrastructure that creates employment such as flood defences, sustainable housing, and water systems. Prioritising infrastructure projects not only protects communities from climate risks but also generates direct employment opportunities. Investments in flood barriers, resilient housing designs, and efficient water management systems offer dual benefits: they improve community safety and stimulate economic activity through construction, maintenance, and related services.
- 3) Build partnerships with unions to roll out community-based adaptation training and awareness programmes. Close collaboration with labour unions can ensure that adaptation measures are designed to the needs of workers and local communities. These partnerships should support the development of training programmes that educate communities on climate resilience, disaster preparedness, and sustainable practices, making adaptation actions more accessible and directly beneficial to workers.
- 4) Integrate the just transition principles and climate policies into the national school curriculum. This approach aims to build awareness and prepare future generations for the evolving workplace, ensuring that the youth are equipped with both the knowledge and values needed to engage with climate-related challenges early on and contribute to a more equitable green economy.
- 5) Recognise and support the role of public service workers in health, emergency response, and social care as frontline adaptation agents. Public service workers are often the first responders during climate-induced disasters. Acknowledging their pivotal role means establishing support mechanisms, such as additional training, hazard pay, and mental health services, so that these workers can efficiently manage crises and contribute to broader community adaptation efforts.

### **Means of Implementation:**

- 1) Expand and fund training programmes through public sector SETAs to ensure that skills development is inclusive, affordable, and available across education levels. By increasing funding for training programmes via public sector SETAs, the NDC can ensure that workers receive the necessary skills for emerging green sectors. This should include accessible courses, vocational qualifications, and on-the-job training opportunities that are available to all, regardless of socioeconomic background, thereby supporting a just transition.
- 2) Create an interdepartmental platform to coordinate the delivery of climate-related skills and workforce planning across all sectors. Establishing a platform for interdepartmental coordination enables streamlined communication and coherent planning between different government bodies. Such a platform would facilitate the sharing of best practices, the harmonisation of training initiatives, and the alignment of workforce planning with both climate and industrial policies, ensuring that efforts to build a green-skilled workforce are effectively implemented.

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- 3) Mandate labour impact assessments as part of all major NDC interventions and ensure worker protection policies are included. Labour impact assessments should become a standard requirement for every significant climate project, detailing how the initiative will affect workers and what measures will be taken to mitigate any negative impacts. Embedding worker protection policies into these assessments helps guarantee that job losses are minimised and that strategies for retraining and redeployment are in place from the outset.
  - 4) Mobilise climate finance to support worker transition funds, reskilling programmes, and small business development in affected regions. Dedicated climate finance should be allocated to create transition funds that specifically support workers in high-emitting sectors. This includes funding for reskilling programmes and small business grants aimed at fostering local economic development in regions that are most affected by the energy transition. Such financial mechanisms are critical to ensuring that the transition is socially just and that workers are equipped to benefit from new, sustainable economic opportunities.

### Concerns regarding the NDC update

Labour stakeholders raised several concerns about the implementation, coordination, and fairness of South Africa's climate commitments. Their input highlighted the risk of repeating past mistakes if worker perspectives are not fully integrated into planning and delivery.

#### **Mitigation:**

- 1) Participants warned of the absence of detailed transition plans for workers in coal, steel, and other carbon-intensive sectors. This concern reflects the fear that, without comprehensive planning, workers in industries that are most affected by decarbonisation will face abrupt job losses and inadequate support. Detailed transition plans are essential to outline retraining opportunities, redeployment strategies, and financial assistance programs to help workers shift to new, sustainable roles without significant disruption to their livelihoods.
- 2) There were concerns that current decarbonisation efforts are driven by top-down targets, with limited regard for employment impacts. The emphasis on ambitious, centrally set targets may overlook the socio-economic realities of affected workers. Labour stakeholders stress that decarbonisation policies should be formulated in consultation with workers and unions to ensure that employment implications are fully considered and that mitigation strategies contribute to a just transition rather than simply imposing abstract goals.
- 3) Labour emphasised the lack of enforceable commitments to social protection, despite promises in the Just Transition Framework. While the Just Transition Framework provides a vision for safeguarding workers, the absence of binding commitments leaves vulnerable employees exposed to potential economic shocks. Without enforceable social protection measures, such as guarantees for retraining, income support, or job security, the theoretical benefits of a just transition remain unfulfilled, undermining trust and long-term commitment to the policy.

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- 4) Workers are not being adequately consulted in the design of mitigation pathways, risking exclusion from future opportunities. Exclusion from the decision-making process means that the perspectives and practical experiences of those on the front lines of industrial change are not taken into account. This lack of consultation can lead to mitigation pathways that do not address key issues faced by workers, ultimately reducing their ability to access new opportunities or secure their livelihoods during the transition to a low-carbon economy.

**Adaptation:**

- 1) Labour expressed concern that adaptation remains vague and underfunded, with few employment-linked adaptation programmes in place. The ambiguity and chronic underinvestment in adaptation measures leave workers without clear strategies or resources to build resilience against climate impacts. Labour stakeholders insist that adaptation actions must be clearly defined and directly tied to job creation, ensuring that vulnerable workers have access to both protective measures and new economic opportunities.
- 2) Adaptation strategies often fail to consider the labour market implications or opportunities for decent work creation. When adaptation policies overlook the potential for creating sustainable employment, they miss the chance to transform climate challenges into avenues for economic development. Ensuring that adaptation measures promote decent work involves designing initiatives that enhance local capacities, support green job creation, and integrate workforce development within resilience-building projects.
- 3) Public sector capacity for adaptation, particularly at the local level, is insufficient to deliver on growing community needs. Limited resources and administrative capacity in local government hinder the effective implementation of adaptation plans. This gap means that essential services, such as emergency response, infrastructure improvements, or community training, may not reach those who need them most, exacerbating vulnerabilities among workers and communities already facing climate pressures.
- 4) There are disproportionate impacts of climate change on low-income and outdoor workers, compared to those in higher income or indoor office roles. This inequality must be explicitly addressed in adaptation planning, with targeted policies to support factory workers, farm labourers, and others whose exposure to climate risks is significantly higher due to the nature of their work and socio-economic status.

**Means of Implementation:**

- 1) Labour flagged policy misalignment across key ministries, with economic policy still reinforcing fossil fuel dependency. Persistent contradictions between climate objectives and existing economic policies create barriers to effective implementation. Labour stakeholders call for a unified policy framework that eliminates conflicting mandates, ensuring that all government departments work in concert to support a transition away from fossil fuels, thereby protecting workers and reinforcing sustainable economic growth.

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- 2) There is frustration at the slow pace of skills development and reskilling despite strong rhetorical commitments. While commitments to build a green workforce are often cited in policy discussions, the actual implementation of training and reskilling programmes lags behind. This slow progress leaves many workers unprepared for the emerging low-carbon economy and undermines the potential for a smooth, inclusive transition. Labour stresses that accelerating these programs is essential to meet both current and future industry needs.
  - 3) Workers in informal and low-income sectors remain invisible in the NDC process, raising concerns about equitable access to training, jobs, and safety nets. The exclusion of workers from the informal economy means that some of the most vulnerable groups may not benefit from adaptation and mitigation initiatives. Labour stakeholders emphasise the need for inclusive processes that ensure equitable distribution of resources, training opportunities, and social protections, so that all workers, regardless of employment status, are supported during the transition.
  - 4) Without strong accountability mechanisms, the NDC risks becoming a symbolic commitment, lacking concrete plans to support working people through transition. The absence of rigorous monitoring, evaluation, and enforcement measures may allow the NDC's ambitious targets to remain unfulfilled in practice. Labour warns that if there is no accountability, or if policies remain unimplemented, the NDC will fail to deliver tangible benefits for workers, leaving them unprotected and potentially worsening socio-economic conditions during the shift to a low-carbon economy.

## Local Government

Engagements with local government stakeholders highlighted both the frontline role municipalities play in climate response and the institutional challenges they face in delivering on climate-related mandates. Participants acknowledged the importance of the NDC as a national commitment but emphasised that successful implementation ultimately depends on coordination, funding, and capacity at the local level. Local government actors called for clearer roles, dedicated financial support, and integration of the NDC into municipal planning instruments. The perspectives below are categorised according to the three central consultation questions, and further organised by Mitigation, Adaptation, and Means of Implementation (MOI).

### Criteria to be followed in developing the NDC

The points below reflect local government perspectives on the institutional and policy foundations needed to ensure that the NDC is implementable at municipal level.

#### **Mitigation:**

- 1) The NDC must explicitly recognise the role of local government in delivering on mitigation targets, especially in the energy, transport, and waste sectors. Local governments are on the front lines of service delivery, infrastructure management, and community engagement. By explicitly acknowledging their role in national mitigation targets, the NDC can empower municipalities to design and implement policies designed to their specific energy use patterns, transportation needs, and waste management challenges. This recognition also facilitates appropriate

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resource allocation and accountability, ensuring that local actions contribute effectively to overall emissions reductions.

- 2) Mitigation actions must be accompanied by financial and technical support, particularly for smaller and under-resourced municipalities. Many local governments face constraints in funding and technical capacity, which can hinder the implementation of effective mitigation measures. Providing dedicated financial resources, expert guidance, and technical assistance is crucial to ensuring that all municipalities, regardless of size or budget, can invest in clean technologies, improve energy efficiency, and upgrade waste management practices. Such support is essential for fostering innovation and achieving targeted decarbonisation outcomes at the local level.
- 3) The need for place-based mitigation planning was emphasised, recognising that municipal contexts vary significantly in energy use, emissions, and capabilities. A one-size-fits-all approach does not suit the diverse conditions across South Africa's municipalities. Local government stakeholders advocate for place-based planning that considers regional characteristics such as population density, economic activities, existing infrastructure, and specific emission sources. Designing mitigation strategies to the local context ensures that interventions are effective, sustainable, and aligned with the unique challenges and opportunities faced by each community.

#### **Adaptation:**

- 1) The NDC must integrate risk and vulnerability mapping into local spatial development frameworks and municipal Integrated Development Plans (IDPs). Incorporating detailed risk and vulnerability assessments into municipal planning ensures that adaptation strategies are evidence-based and targeted where they are needed most. By embedding these maps into local spatial development frameworks and IDPs, municipalities can identify critical areas at risk, prioritise investments in protective infrastructure, and coordinate adaptation actions with broader urban and rural development plans.
- 2) There was strong emphasis on decentralised adaptation strategies, empowering local government to lead implementation in partnership with communities. Decentralised approaches enable local governments to leverage on-the-ground knowledge and collaborate directly with community stakeholders. Empowering local leaders facilitates specific adaptation measures that reflect local challenges and resources, resulting in more resilient and context-specific outcomes. Such strategies encourage partnerships that amplify local capacity and ensure that adaptation is responsive to the evolving needs of communities.
- 3) Local governments called for institutionalised adaptation mandates with measurable outcomes at municipal level. Stakeholders also highlighted that inadequate maintenance, as well as persistent challenges related to theft and vandalism, significantly increase the vulnerability of infrastructure and communities to the impacts of extreme weather events. Establishing formal mandates and clear performance indicators for adaptation within local government structures creates accountability and allows for the systematic monitoring of progress. When outcomes

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are measurable, municipalities can track the success of adaptation initiatives, such as improvements in disaster preparedness, water security, or infrastructure resilience, ensuring that policies are not only implemented but are also effective in mitigating local climate risks.

### **Means of Implementation:**

- 1) There was a clear call for mandated and ringfenced climate finance to support NDC implementation at the local level. Dedicated funding streams that are earmarked for climate action are critical for overcoming resource limitations in municipalities. Ringfenced finance ensures that allocated funds are protected from reallocation to other priorities, thereby providing a steady and reliable financial base for implementing mitigation and adaptation projects at the local level.
- 2) Local officials requested clarity on their role in national climate governance, including in decision-making and reporting mechanisms. Clear delineation of roles within the national climate governance framework is essential to ensure that local governments are integrated into the decision-making process. Defining these roles, through structured reporting systems and involvement in policy formulation, allows municipalities to contribute their unique insights, enforce accountability, and ensure that the broader NDC objectives are grounded in local realities.
- 3) Participants highlighted the need for capacity-building and technical assistance to mainstream climate objectives into municipal functions and services. Enhancing the institutional capacity of local governments is key to transitioning climate policies from strategy to action. Targeted training and technical support enable municipal staff to incorporate climate resilience into everyday service delivery, urban planning, and emergency response. This capacity-building helps develop a skilled local workforce and creates a foundation for sustainable climate governance at all levels of government.

### **Specific actions/targets that should be included in the NDC**

Local government stakeholders proposed specific measures that would support climate action at the local level while enhancing institutional delivery and service provision.

### **Mitigation:**

- 1) Promote municipal renewable energy generation and procurement, including through the Municipal Energy Resilience (MER) initiative and wheeling arrangements. This action calls on municipalities to take an active role in generating their own renewable energy and procuring clean power via mechanisms like the MER initiative. Wheeling arrangements can enable excess renewable electricity to be shared between municipalities, reducing reliance on the national grid and lowering emissions. Such measures not only support sustainable energy production at the local level but also enhance energy security and stimulate local economic development.
- 2) Set targets for public transport electrification, including buses and minibus taxis, especially in urban metros. Establishing clear electrification targets for public transport is essential for reducing urban air pollution and greenhouse gas emissions.



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By focusing on buses and minibus taxis in metropolitan areas, local governments can significantly cut emissions in densely populated regions, improve urban mobility, and contribute to improved public health outcomes. Incentivising the shift to electric vehicles will also help pave the way for broader infrastructural improvements in charging networks and renewable energy integration.

- 3) Incentivise municipal waste-to-energy projects, biogas generation, and other circular economy solutions. Encouraging waste-to-energy projects and biogas production taps into the potential of circular economy practices to reduce both waste and emissions. Such initiatives can transform municipal waste streams into valuable energy resources while reducing landfill use and methane emissions. These projects also create local jobs, support sustainable waste management, and contribute to the diversification of municipal energy portfolios.
- 4) Support local job creation through green infrastructure projects such as energy-efficient buildings and street lighting. Investments in green infrastructure projects not only help reduce energy consumption and carbon footprints but also generate employment opportunities at the local level. Upgrading public buildings for energy efficiency and implementing smart street lighting systems can drive sustainable urban development, reduce operational costs over time, and provide tangible economic benefits to communities by creating jobs and stimulating local business activity.

**Adaptation:**

- 1) Develop and fund climate-resilient infrastructure projects at municipal level, such as stormwater upgrades and drought-proof water systems. Municipal infrastructure projects focused on resilience, such as improved stormwater management systems, flood defences, and drought-proof water distribution networks, are critical for protecting communities against the adverse impacts of climate change. By prioritising these investments, municipalities can enhance local safety, safeguard public health, and ensure the continuity of essential services during extreme weather events.
- 2) Introduce municipal-level adaptation indicators and targets linked to IDPs and Service Delivery and Budget Implementation Plans (SDBIPs). Integrating specific adaptation indicators into municipal Integrated Development Plans (IDPs) and SDBIPs can provide a clear framework for measuring progress and ensuring accountability. These targets would enable local governments to track the effectiveness of their adaptation measures, allocate resources more efficiently, and align adaptation actions with broader service delivery and infrastructural objectives.
- 3) Strengthen support for coastal municipalities facing sea-level rise, erosion, and extreme weather events. Coastal municipalities are particularly vulnerable to the impacts of climate change. Strengthening support for these areas may involve specialised funding, technical assistance, and coordinated planning efforts focused on protective infrastructure, such as seawalls and mangrove restoration. Providing support will help coastal communities mitigate risks, adapt to changing conditions, and protect both their economies and natural resources.

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- 4) Integrate climate-smart land-use planning and early warning systems across municipalities. By incorporating climate-smart principles into land-use planning, municipalities can proactively manage urban and rural development to enhance resilience. Early warning systems are crucial to alert communities about impending climate hazards, allowing for timely responses that reduce potential damage and save lives. Together, these measures build a more robust framework for managing climate risks at the local level.

### **Means of Implementation:**

- 1) Allocate a dedicated climate finance mechanism for municipalities, ensuring equitable distribution and accountability. Establishing a ring-fenced funding stream specifically for municipal climate actions is essential to provide consistent, reliable financial support for both mitigation and adaptation projects. This dedicated finance mechanism should be managed transparently and distributed equitably among municipalities, with clear criteria that prioritise areas facing the greatest vulnerability and need.
- 2) Provide municipalities with access to national and international climate funds, including readiness support for proposal development. Enhancing the capacity of local governments to tap into broader climate finance channels is key to bridging resource gaps. This includes offering technical and administrative support for proposal development, ensuring that municipalities can effectively compete for national and international funding, and thereby implement ambitious climate projects that align with both local priorities and national goals.
- 3) Scale up training on climate risk assessment, GHG inventorying, and project preparation for municipal staff. Building technical capacity is critical for the successful implementation of the NDC. Targeted training programmes for municipal staff will equip them with the necessary skills to conduct climate risk assessments, compile greenhouse gas inventories, and prepare competitive project proposals. Enhancing these capacities fosters a more informed and proactive local climate governance framework.
- 4) Embed climate objectives in national planning guidelines, enabling alignment between the NDC and municipal budgets, IDPs, and infrastructure frameworks. Ensuring that climate objectives are integrated into national planning guidelines facilitates consistency and cohesion between different levels of government. When municipal budgets, IDPs, and infrastructure development plans are aligned with the broader NDC objectives, it creates a harmonious policy environment that maximises the impact of both national and local climate initiatives and promotes more effective, coordinated implementation.

### **Concerns regarding the NDC update**

Local government stakeholders expressed concerns about capacity gaps, policy fragmentation, and the lack of dedicated support for implementation at municipal level. They also warned of the risks of unfunded mandates and misaligned national planning.

### **Mitigation:**

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- 1) Participants raised concerns that municipalities are expected to contribute to emissions reductions without adequate authority or resources. Many local governments feel burdened by ambitious national targets yet lack the decentralised authority, technical expertise, and financial support needed to effectively implement mitigation measures. This mismatch creates unrealistic expectations, making it difficult for municipalities to drive localised emissions reductions while also managing other municipal responsibilities.
  - 2) Delays in regulatory frameworks for municipal energy generation were identified as a barrier to local mitigation action. The slow pace in developing clear, enabling regulations impedes municipalities from investing in and scaling up renewable energy initiatives. Regulatory uncertainty restricts planning for new projects, discourages local investments in energy infrastructure, and hinders the integration of municipal energy generation into the national grid.
  - 3) Smaller municipalities face challenges with data availability and emissions tracking, limiting their ability to plan or report on progress. The absence of comprehensive, accessible data systems creates difficulties for small municipalities in accurately measuring and monitoring their emissions. Without reliable emissions inventories and tracking tools, these municipalities struggle to design targeted interventions, secure necessary funding, or demonstrate progress, further marginalising their role in the national mitigation strategy.

#### **Adaptation:**

- 1) Stakeholders emphasised the increasing burden of climate impacts including floods, droughts, and heatwaves which are outpacing current municipal capacity. Local governments are increasingly confronted with severe and frequent climate events that strain existing infrastructure and service delivery systems. This accelerating trend of extreme weather places enormous pressure on municipalities, highlighting significant gaps between emerging climate risks and the capacity of local institutions to respond effectively.
- 2) Some municipalities lack the tools to translate national adaptation goals into implementable local actions. A significant disconnect exists between high-level adaptation targets set at the national level and the actionable strategies that municipalities can implement. Without dedicated planning tools, technical support, and context-specific frameworks, local governments struggle to convert broad adaptation goals into practical initiatives that directly address local vulnerabilities.
- 3) Concerns were raised about the disconnect between national adaptation planning and local delivery mechanisms. There is a perceived misalignment between the centralised adaptation strategies and the ground-level realities faced by municipalities. This gap results in policies that do not fully reflect local needs or capacities, leading to ineffective resource allocation and implementation delays that can leave communities unprepared for climate impacts.

#### **Means of Implementation:**

- 1) Local governments are expected to implement NDC-related actions without ringfenced funding, placing pressure on already constrained municipal budgets.

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The lack of dedicated, protected funding streams means that local climate actions must compete with other critical municipal expenditures. This budgetary pressure can force municipalities to compromise on the scale and scope of climate initiatives, jeopardising the overall effectiveness of the NDC at the local level.

- 2) There is insufficient clarity on how national climate targets cascade down to local government, creating uncertainty and fragmentation. The absence of a transparent mechanism for disaggregating national targets into local commitments leaves municipalities unclear about their roles, priorities, and specific performance expectations. This uncertainty hinders effective planning, coordination, and implementation of climate policies at the local level.
- 3) Capacity constraints, including staff shortages, limited technical expertise, and lack of climate governance structures, were cited as key obstacles. Many municipalities operate with limited human and technical resources, which undermines their ability to manage complex climate projects. The shortage of trained personnel, combined with inadequate governance frameworks, restricts local governments from effectively developing, executing, and monitoring both mitigation and adaptation actions.
- 4) Without formal mechanisms for feedback and collaboration, municipalities feel excluded from national climate decision-making processes. The current top-down approach to national climate policy development often leaves local governments without a clear channel for sharing insights or influencing strategy. This exclusion not only weakens policy coherence between different government levels but also diminishes local ownership and accountability, ultimately risking the success of climate interventions at the community level.

## Gender

The consultation highlighted the need to mainstream gender across all components of the NDC update, not only through policy statements but via measurable targets, resourcing, and inclusive implementation frameworks. Stakeholders emphasized that gender equality must be a pillar of climate justice, and achieving a just transition requires deliberate, systemic transformation that empowers and includes women across all sectors. The summary is structured according to the three key aims of the consultation.

### Review of the 2025–2030 NDC and Recommendations for Gender Responsiveness

Participants noted that the current NDC lacked sufficient integration of gender considerations and failed to explicitly frame gender equality as a cross-cutting priority.

#### Key Gaps Identified:

- 1) Limited gender mainstreaming in existing sectoral targets (e.g. energy, transport, agriculture), which often reflect male-dominated economic activities.
- 2) Lack of disaggregated data and gender indicators for monitoring progress, especially in adaptation-related targets.

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- 3) No recognition of care work and unpaid labour typically undertaken by women, and how climate measures (e.g. time burdens or displacement) may exacerbate these.
  - 4) Inadequate representation of women and marginalized voices in NDC processes and implementation plans.

#### **Suggested Improvements:**

- 1) Include gender-disaggregated indicators and targets for sectors with high female labour participation (e.g. agriculture, tourism, care services).
- 2) Adopt a gender-responsive budgeting approach for NDC targets and means of implementation.
- 3) Frame gender inclusion not as vulnerability but as agency and leadership in climate action.
- 4) Expand public employment with a focus on higher pay and longer-term contracts for women.

#### **Strategies for Gender-Responsive Mitigation, Adaptation and Means of Implementation**

Breakaway sessions addressed the three pillars of the NDC and proposed practical strategies to enhance gender responsiveness:

##### **Mitigation:**

- 1) Mainstream gender into mitigation targets (e.g. energy, emissions reductions, industry transition).
- 2) Prioritize affordable energy access through microgrids with quotas for women-led projects.
- 3) Advance gender-inclusive green jobs and skills development in STEM, targeting young women and girls.
- 4) Improve representation of women-owned SMMEs in clean energy and circular economy initiatives.

##### **Adaptation and Resilience:**

- 1) Design adaptation solutions through co-creation with women, incorporating indigenous knowledge and lived experience.
- 2) Promote gender-specific adaptation indicators, e.g., land rights, time savings from water and fuel collection, health outcomes.
- 3) Strengthen multi-generational women's networks and ensure inclusive early warning systems and climate services.

##### **Means of Implementation:**

- 1) Channel grants and concessional finance toward sectors where women are concentrated, such as agriculture, informal settlements, and social protection.

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- 2) Leverage climate finance to strengthen municipal and local government capacity to deliver gender-responsive services.
  - 3) Develop just transition financial instruments that prioritize women-led initiatives and small enterprises.
  - 4) Encourage transparency and accountability in donor finance, pushing for grants over loans, and inclusion of domestic financial actors.

## Barriers to Gender-Responsive Implementation and Proposed Solutions

### Identified Barriers:

- 1) Institutional misalignment between departments (e.g., DFFE not present at gender consultation), risking incoherent strategies.
- 2) Lack of dedicated gender capacity in local and national climate governance structures.
- 3) Minimal data availability for assessing differentiated impacts and tracking gender outcomes.
- 4) Language and framing: use of “vulnerability” undermines women’s agency; need for empowerment-based framing.

### Solutions Proposed:

- 1) Establish cross-cutting gender integration mechanisms in climate institutions (e.g., dedicated gender focal points).
- 2) Invest in data collection, participatory research, and partnerships with institutions like Stats SA.
- 3) Prioritize bottom-up, participatory planning, particularly with indigenous women, youth, and people with disabilities.
- 4) Incorporate transparent, accountable financial mechanisms that are accessible to women and small-scale actors.

A written submission received from the University of Witwatersrand Southern Centre for Inequality Studies welcomed the focus on municipal capacity strengthening but raised several additional points:

- 1) **Grant targeting:** Grants must be prioritised in areas where funding is lacking or profitability is low, such as adaptation, skilling, rural agriculture, and energy access initiatives like solar micro-grids. These sectors are often where women and low-income groups are most concentrated.
- 2) **EVs and hydrogen:** Concerns were raised about the heavy focus on electric vehicles and green hydrogen, noting their limited accessibility and high implementation barriers in South Africa. A broader focus on affordable public transport—trains, buses, subways—was recommended as a more equitable climate mitigation pathway.
- 3) **Carbon markets vs. carbon tax:** It was noted that while carbon markets may mobilise some finance, they are not South Africa’s primary mitigation mechanism. The Climate Change Act centres carbon taxation and carbon budgets, which should be given more analytical attention in the NDC.
- 4) **Climate finance sources:** While international climate finance must still be pursued, there are risks in relying on loans from international donors. Grants should be the



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preferred mechanism. Domestically, stakeholders suggested regulating corporate CSI funds to channel capital toward climate resilience and equity.

**5) Other proposals:**

- a) Expand public employment programmes, ensuring better pay and longer-term contracts.
- b) Capacitate Local Economic Development (LED) desks at municipal level.
- c) Create a Just Transition Finance Call Centre to improve awareness and access to finance for small-scale actors.

## **FOCUSSED THEMATIC ROUNDTABLE DISCUSSIONS**

As part of the consultation process for the 2035 NDC update, the PCC engaged a wide range of contributors, including technical specialists, institutional and sectoral leaders and representatives from business, labour, civil society, academia, local and national government. These individuals participated in dedicated roundtable discussions on Mitigation, Adaptation, and Means of Implementation, with some submitting written feedback following the workshops, which was also recorded and incorporated in this report.

While not representing organised stakeholder constituencies, their contributions provided insights, often reinforcing, challenging, or adding nuance to broader stakeholder perspectives. The section below synthesises commentary across the three NDC pillars. These inputs provided critical insights grounded in scientific and practical implementation experience, and institutional knowledge.

### **Adaptation**

#### **Criteria for Developing the NDC**

Participants stressed the need to go beyond physical climate impacts and adopt a systemic lens that includes economic, social, and governance dimensions. Adaptation should be informed by a definition of “ambition” that reflects transformation across systems—not incremental improvements to the status quo. It was noted that adaptation cannot follow a “business-as-usual with tweaks” approach and must instead consider what a resilient future economy looks like, particularly in light of governance weaknesses and spatial vulnerabilities.

The importance of regionalised, indicator-based adaptation planning was raised repeatedly. Participants supported the use of existing quantitative indicators aligned with national systems (e.g. SDGs, StatsSA, TEEB) and advocated for spatial disaggregation to improve planning and tracking across vulnerable geographies. Adaptation success, it was argued, must be measured by regional outcomes and ability to recover from compound climate shocks.

#### **Concerns regarding the NDC update**

A major concern raised was the lack of national accountability in adaptation delivery. The NDC must go beyond high-level framing and provide clarity on roles, financing, and data custodianship. Currently, fragmented, and inaccessible data across institutions—often behind paywalls—limits planning and evaluation. Participants recommended establishing a national entity or portal to collate and publish adaptation data.

Concerns were raised about the absence of a theoretical framework guiding adaptation, which undermines coherence. A suggestion was made to draw from the

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NBI adaptation framework and recent IPBES transformations work to define a consistent lens across sectors.

The gap between policy and implementation was highlighted, particularly regarding local government capacity. While some municipalities perform well, the generalisation that “local government lacks capacity” risks disempowering those with proven delivery records. Instead, adaptation delivery should be supported through structured multi-sectoral partnerships and decentralised finance mechanisms.

### **Proposed actions to be included in the NDC update**

There was strong support for linking adaptation in the NDC to long-term infrastructure and health planning cycles. Participants warned that failure to embed adaptation into strategic projects (e.g. Lesotho Highlands Phase 2, health infrastructure) could result in maladaptation or missed opportunities due to long lead times. Specific mention was made of the Gauteng Day Zero scenario as a critical cross-cutting risk with national implications.

Participants also emphasised the need for coastal region planning, citing population migration trends toward the coast by 2030. Mangrove restoration, as seen in Mozambique, and inclusion of the Oceans Economy Masterplan were proposed as examples of how to integrate ecological and socio-economic adaptation.

Additionally, participants proposed integrating food systems adaptation by explicitly supporting local-scale food systems alongside commercial agriculture. This includes regionalised planning to address heat stress, water scarcity, and urban-rural food insecurity dynamics.

## **Mitigation**

### **Criteria for Developing the NDC**

Participants stressed the importance of grounding the 2035 target within a total carbon budget trajectory of 9–10 GtCO<sub>2</sub>e, underscoring the need to align mitigation ambition with the science and South Africa's developmental context. A clear distinction was urged between conditional and unconditional targets, based on what South Africa can achieve with or without international financial and technological support. Participants also called for a transparent articulation of what levels of greenhouse gas removals will be required to achieve net-zero by 2050, cautioning that without disaggregation of emissions and removals, there is a risk of overshooting.

There was consensus among participants that the credibility of the NDC relies on ensuring the target is not perceived as unrealistic. They recommended modelling and communicating the implications of different emissions pathways—including 2°C and well-below-2°C trajectories—to better inform policymaking. This includes clarifying where the country currently stands in relation to the 2030 NDC commitments and identifying the structural drivers behind the gap, such as delays in coal plant decommissioning and in implementation of the Sector Emission Targets (SETs).

### **Concerns regarding the NDC update**

Participants raised concerns about the feasibility of achieving a 6% reduction in emissions under current economic conditions, marked by low growth and constrained employment. They flagged the risks of setting overly ambitious targets without sufficient

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implementation readiness or delivery frameworks, cautioning that an NDC perceived as unattainable could erode stakeholder buy-in.

There were also calls to strengthen policy certainty, especially around instruments such as the SETS, which remain non-binding. Participants questioned whether industrial strategies developed by agencies such as the IDC and DTIC had been sufficiently integrated into NDC mitigation modelling. They pointed to the need for greater coherence between industrial policy, localisation goals (as raised in SAREM), and the NDC's decarbonisation objectives.

Finally, participants urged the PCC to frame net-zero not simply as a numeric goal but as a just transition imperative, with strong attention to equity, job protection, and support for vulnerable sectors and communities.

### **Proposed actions to be included in the NDC update**

- a) Participants proposed that sector-specific targets, particularly for energy and industry, should be integrated with national planning instruments such as the IRP and JET-IP, and emphasised the need to better align mitigation scenarios with broader economic diversification strategies. They noted that electricity decarbonisation should be prioritised in the near term, not only because of the emissions potential, but to enable deeper future mitigation in hard-to-abate sectors.
- b) Carbon capture and storage (CCS) and green hydrogen (GH<sub>2</sub>) were acknowledged as emerging technologies with potential, though participants warned against over-reliance given current uncertainties and cost trajectories. GH<sub>2</sub> was considered to offer greater socio-economic benefits than CCS, particularly for industrial transformation, though both require significant public-private collaboration.
- c) Participants also highlighted the importance of integrating land sector actions with mitigation planning, particularly as many adaptation initiatives offer dual mitigation benefits. They called for better quantification and inclusion of these synergies in the updated NDC.

### **Means of Implementation**

#### **Criteria for Developing the NDC**

Participants emphasised that a key barrier to effective implementation lies in the fragmentation of responsibilities and the absence of a shared national vision. Several contributors noted that current efforts to operationalise the NDC occur in silos, exacerbated by a lack of clarity over institutional mandates and divergent understandings of South Africa's obligations under the Paris Agreement. There was strong consensus that implementation frameworks should begin with a clearly articulated, co-owned vision that clarifies roles across public and private sectors.

A recurring concern was the mismatch between planning and execution. Participants pointed out that South Africa tends to spend significant time designing policies and consulting widely but struggles with delivery. This was attributed not only to capability gaps, but also to a lack of courage and decisiveness in making uncomfortable trade-offs. One contributor described this dynamic as a "crisis bias" — with effective action more likely when disruption is acute (e.g., loadshedding, COVID-19), than during slow-

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onset crises like climate change. Participants urged the development of implementation pathways that are gradual and structured, not reactive or crisis driven.

There was a strong call for institutional reflection: whether climate change should continue to be managed through traditional government structures, or if a new delivery architecture is required—potentially through a national implementer or cross-sectoral delivery platform. Participants also raised the importance of building trust between actors, noting that vested interests and differing problem definitions are slowing progress.

Climate risk was another key theme. Participants warned that climate-related risks are still poorly integrated into national planning and business operations, with insufficient visibility across departments. They recommended embedding climate risk assessments into all major planning processes, alongside a full backward-looking review of the current NDC to identify lessons for the next cycle.

### **Concerns regarding the NDC update**

Participants expressed concern that the current NDC cycle remains overly focused on short-term ambition, aligned to political timelines, and does not sufficiently account for the structural transitions needed beyond 2035. This, they noted, risks creating “planning churn” rather than steady progress.

There were also warnings about the potential for unintended consequences from crisis-driven decisions. One participant referenced the economic fallout from the electricity crisis response (e.g., sharp price increases) as an example of poorly coordinated interventions. The suggestion was to ensure that NDC-related decisions are screened for distributional impacts, particularly on vulnerable groups.

Lastly, there was broad agreement that implementation must be made tangible—not just in terms of infrastructure or technology, but through leadership, trust, and confidence in South Africa's ability to deliver. “We must stop doubting ourselves,” one participant noted, “and start managing risk with the seriousness it deserves.”

### **Proposed actions to be included in the NDC update**

Participants called for the promotion of initiatives that demonstrate clear social and environmental co-benefits, as a strategy for attracting financing. While funding for mitigation projects is increasingly mainstreamed, adaptation—being more intangible—continues to lag. One suggestion was to explicitly identify “low-hanging fruit” projects with measurable resilience and development benefits, such as water security or public infrastructure upgrades.

The NDC should also define institutional delivery models. Participants proposed the establishment of a public-private implementation structure to coordinate cross-sectoral actions, possibly linked to the LEDS or JET-IP governance platforms. This structure would be accountable for delivery, not just strategy.

They also recommended that the NDC include provisions for regular institutional audits of implementation progress, including climate finance tracking and effectiveness reviews. Several contributors stressed that the NDC should shift from being a planning document to a performance-driven framework, with monitoring indicators aligned to both GHG reduction and resilience-building metrics.

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## NDC THEMATIC WEBINARS

This section captures insights and recommendations gathered from stakeholders during the three thematic webinars facilitated by the PCC on adaptation, mitigation, and means of implementation. These consultations allowed direct stakeholder interaction, providing real-time opportunities to clarify concerns, propose enhancements, and share critical local and sector-specific experiences. The summarized insights reflect the depth and breadth of stakeholder perspectives voiced during the webinars, complementing consultations and engagements that occurred prior to and during the recommendation's development process.

During the webinar consultations, stakeholders from civil society, community-based organizations, and local governance reinforced the importance of explicitly incorporating climate-induced migration and displacement considerations within national adaptation plans. The consultations highlighted that robust local-level implementation frameworks, integrated through mechanisms such as the District Development Model, are crucial to translating national climate ambitions into practical community-level outcomes.

Participants representing civil society, NGOs, and community advocates urged greater emphasis on decentralized renewable energy initiatives within mitigation strategies. Stakeholders pointed to decentralized renewable energy development as critical for enhancing local resilience, ensuring equitable energy access, and promoting socio-economic co-benefits, particularly for historically marginalized communities.

Feedback from webinars also underscored the necessity of clearly articulated emissions targets for sectors such as waste management, recognizing significant opportunities for mitigation, job creation, and economic growth through decentralized organic waste management solutions.

Contributors consistently highlighted the critical need for transparent and robust measurement, reporting, and verification (MRV) systems, urging integration of community-generated data to reflect localized climate impacts accurately. Stakeholders emphasized that transparent MRV frameworks are essential for monitoring progress and ensuring accountability at all implementation levels.

Strong emphasis was placed on the intersections between climate change and mental health, with stakeholders recommending explicit integration of mental health considerations into national climate action frameworks. It was acknowledged that climate-induced stress, anxiety, trauma, and related health impacts necessitate proactive mental health support mechanisms within climate planning processes.

Contributions from business, SMEs, and financial representatives addressed concerns regarding the socio-economic implications of Just Energy Transition investment plans, recommending detailed socio-economic analyses to pre-emptively identify and mitigate potential adverse effects on energy pricing, employment, and inequality.

Lastly, stakeholders across webinar sessions emphasized the importance of meaningful inclusion of SMEs within climate procurement and finance ecosystems, recommending explicit policy mechanisms to enable fair SME participation and integration in climate-related value chains.

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## DRAFT RECOMMENDATIONS FOR SOUTH AFRICA'S 2030-2035 NDC UPDATE - WRITTEN COMMENTS

This section summarizes the key insights, concerns, and recommendations received through formal written submissions during the public comment period, following the publication of the Draft Recommendations for South Africa's 2030-2035 NDC Update. Stakeholders had a 19-day window to provide detailed responses, enabling deeper reflection and thorough analysis.

- 1) Stakeholders across diverse sectors, including business and industry, civil society, academia, non-profits, and finance, provided detailed and considered feedback on various thematic areas, notably mitigation strategies, adaptation frameworks, financing mechanisms, socio-economic implications, inclusivity, and governance considerations. The summaries presented here reflect the common themes, critical perspectives, and valuable proposals that significantly contributed to the refinement and clarity of the draft NDC recommendations.
- 2) Stakeholders from business and industry expressed concerns regarding the feasibility and socio-economic impacts of the proposed emission reduction trajectories, particularly emphasizing the risks posed by rapid decarbonisation to economic stability, employment, and sectoral competitiveness. They recommended structured, phased approaches aligned with clear sectoral policies and incentives, as well as maintaining consistency with existing economic and industrial strategies.
- 3) Civil society and environmental advocacy groups strongly recommended explicit integration of gender and intersectional considerations into all aspects of climate policy, highlighting the importance of developing gender-responsive indicators and policies that address differentiated climate impacts. Additional emphasis was placed on strengthening adaptation governance frameworks, integrating explicit policies on climate-induced migration, and increasing biodiversity considerations through ecosystem restoration and nature-based solutions.
- 4) Stakeholders from the financial sector highlighted the critical necessity for clear, coherent policy signals across governmental departments, emphasizing that fragmented policies pose substantial risks to mobilizing private climate finance. They recommended integrated national fiscal frameworks explicitly designed to facilitate climate finance flows, and transparent tracking mechanisms for domestic and international financial contributions.
- 5) Feedback from non-profit organizations underscored critical inclusivity gaps, specifically the need for policies and practical measures designed explicitly to support vulnerable groups disproportionately impacted by climate events, including disabled individuals and marginalized communities. Recommendations included targeted support for municipal-level adaptation, enhanced accessibility measures for persons with disabilities, and proactive community engagement in climate planning processes.

Stakeholders across sectors called for heightened governance transparency, advocating for stringent measures to prevent undue influence from anti-climate lobbying interests. The necessity of transparency regarding underlying data, assumptions, and methodologies informing NDC decisions was consistently emphasized to build public trust and ensure scientifically robust, equitable climate action.





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TOWARDS A JUST TRANSITION

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