



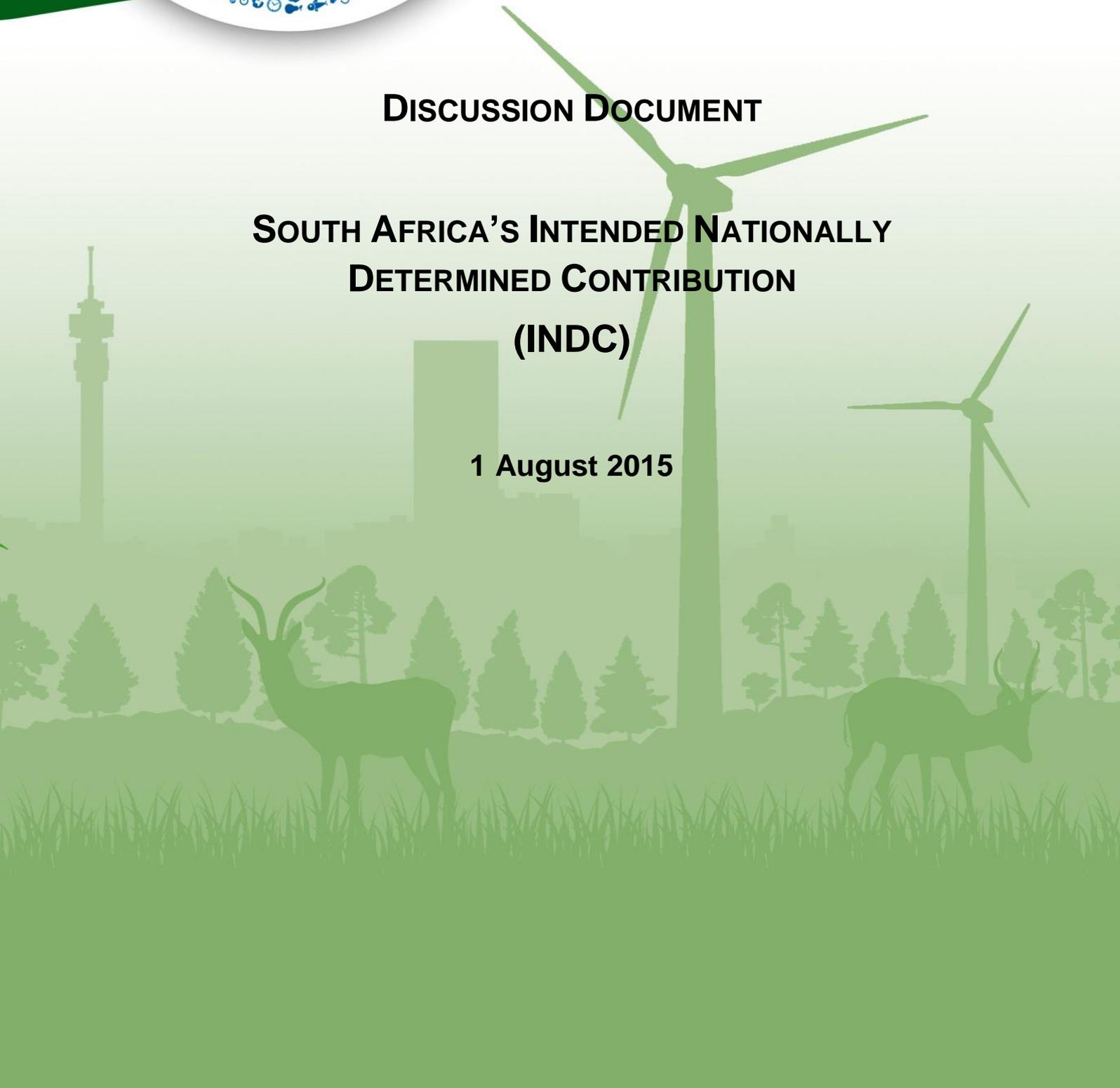
SOUTH AFRICA'S **INDC**

Intended Nationally Determined Contributions

DISCUSSION DOCUMENT

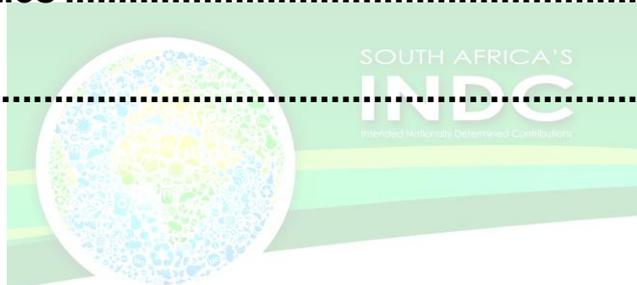
SOUTH AFRICA'S INTENDED NATIONALLY DETERMINED CONTRIBUTION (INDC)

1 August 2015



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Note to reader: Preparation of INDCs is mandated by UNFCCC decisions 1/CP.19 and decision 1/CP.20, the latter specifying information for mitigation (para 14); and in paragraph 12 providing options to communicate an adaptation component of an INDC (A-INDC), or "undertakings in adaptation planning". SA will submit a single INDC, including adaptation, mitigation and an indicative required means of implementation for both. Well before the twenty-first Conference of the Parties (COP-21) to the United Nations Framework Convention on Climate Change (UNFCCC) in Paris (December 2015), the South African Cabinet is expected to approve the INDC for the country, which will be formally communicated formally to the UNFCCC and other Parties.

1. Introduction: Context and National Priorities

South Africa's commitment to addressing the challenge of climate change is based on science and equity. Our national response considers both development needs and climate change imperatives. In this context, South Africa submits its intended nationally determined contribution (INDC) on adaptation, mitigation and investment requirements for both.

South Africa is a responsible global citizen, whose response is informed by the findings of the Intergovernmental Panel on Climate Change (IPCC) that warming of the climate system is unequivocal, and understanding that further mitigation efforts by all are needed to avoid high to very high risk of severe, widespread, and irreversible impacts globally. Climate change is already a measurable reality as a result of the accumulation of long-lived GHG emissions since the industrial revolution. Along with other developing countries, South Africa is especially vulnerable to its impacts. Therefore, given that poor countries and communities are least responsible for the problem of global climate change but are the most vulnerable to its impacts, adaptation is a global responsibility and concern. This structural inequity must be resolved in addressing climate change through responses at global, national and local levels with inter-linkages and associated support needs. South Africa's climate change response is that of a developmental state in the context of a sustainable development approach to address global climate change.

The nature of the climate change challenge is one characterised by the overuse of a global commons in an unequal world. South Africa is firmly committed to working with others to ensure temperature increases are kept well below 2°C above pre-industrial levels, which could include a further revision of the temperature goal to below 1.5°C in light of emerging science, noting that global average temperature increase of 2°C translates to up to 4°C for South Africa by the end of the century. This goal is an essential starting point for our INDC, and we believe should inform all countries' contributions – in relation to both

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adaptation and mitigation. More and earlier mitigation means fewer unavoidable impacts. Near zero emissions of CO₂ and other long-lived GHGs are needed in the second half of the century to avoid even greater impacts. The solution must lie in collective action.

This INDC is premised on the finalisation of an ambitious, fair, effective and binding multilateral agreement under the UNFCCC and its Kyoto Protocol at COP 21 and CMP 11 in Paris to enable the delivery of ambitious mitigation, adaptation, climate finance, technology, capacity building and effective transparency arrangements. The principles of equity and common but differentiated responsibilities and respective capabilities must apply operationally to any Agreement under the Convention. This could take the form of a principle-based reference framework. Given SA's vulnerable populations, we consider our national interest to encompass both development to eliminate poverty and a global climate change response that is fair, effective and ambitious, in the context of a multi-lateral rules based agreement.

South Africa faces the challenge of climate change as a developing country, with priorities to reduce poverty and inequality. South Africa's contribution to the collective challenge is framed by both its National Development Plan (NPC 2012) and its climate policy, the 2011 National Climate Change Response White Paper (RSA 2011). In Copenhagen, SA indicated that its GHG emissions are expected to peak between 2020 and 2025, plateau for approximately a decade and decline in absolute terms thereafter. The National Development Plan (NDP) for South Africa provides a '2030 vision' to guide the country's development trajectory such that poverty is eliminated and inequalities are reduced by 2030. Government sectoral plans therefore have to ensure long-term alignment with the NDP to ensure that the planning and implementation outcomes can be achieved. Vertical integration across national, provincial and local government is critical to implementation. Good progress has been made in implementing climate-compatible sectoral plans, for example its integrated energy and electricity planning (IEP and IRP); industrial policy action plans (IPAP); and the new growth path (NGP). The full implementation of the NDP and sectoral plans will bend the curve of SA's GHG emissions towards the peak, plateau and decline trajectory range.

Furthermore, the NDP states that climate change is already having an impact on South Africa with marked temperature increases, rainfall variations and rising sea levels. The NDP therefore recognises that in the short-term policy needs to quickly and effectively respond to ensure that society and the natural environment are protected from the adverse effects of climate change. The country further seeks to develop a National Climate Change Adaptation Strategy

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and Plan by 2017 that will be used as the National Adaptation Plan (NAP) which will prioritize the key activities to co-ordinate and implement the South Africa's climate change adaptation response. South Africa considers its adaptation strategy to be an important contribution to the global goal for adaptation.

The country's aspirational goal on adaptation is to build resilience and adaptive capacity to respond to climate change risk and vulnerability; whilst providing guidance on the integration of climate change responses into current and future development objectives; through optimising policy, planning, and implementation coherence of climate change adaptation actions.

Zero poverty is over-riding and crucial priority for South Africa, even as we need a world that moves to net-zero GHG emissions. South Africa is putting in place a mitigation system, to realise the opportunities of a low-carbon economy while being mindful that a just transition requires time and careful development. Our poor communities are particularly vulnerable to the adverse impacts of climate change, a challenge we share with many poor countries in Africa. Our National Sustainable Development Strategy has been integrated into the National Development Plan, which contributes to global Sustainable Development Goals (SDGs). In the short-term (up to 2025), South Africa faces significant rigidity in its economy and emphasises the need to address poverty and inequality. Eliminating poverty requires addressing major challenges in creating employment, which in turn requires improving basic education, health and social welfare and many other basic needs such as access to food, shelter and modern energy services. SA is currently facing acute energy challenges, yet still is taking on incremental investments for climate change. Our previous pledge took into account the building of two new coal-fired power stations that are currently nearing completion. Despite these challenges, SA has attracted investment in 5243 MW of renewable energy, and is considering adding a further 6300 MW. Programmes to increase efficiency and reduce emissions intensity are in place. SA's INDC should be understood in the context of these national circumstances, where the global climate change multi-lateral system includes the mobilisation of and access to finance, technology and capacity building for developing countries, and that as a developing country SA is putting in place a system to achieve a fair contribution.

2. Adaptation component of the INDC (A-INDC)

South Africa communicates that it will address adaptation through six goals, underpinned by key elements of adaptation planning, costing of adaptation needs, investment in adaptation, equity, and means of implementation. The table below

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outlines information on the adaptation component of the INDC, premised on the obligation of parties as outlined in Articles 4 and 12 of the Convention,¹ with a view of enabling Parties with obligations in Articles 4.4 and 12 to provide an adaptation component of their post 2020 undertakings in the 2015 Agreement.

Element	Undertaking for the period 2021-2030	Assumptions / Methodologies	Adaptation investment needs (2021 – 2030)	UNFCCC context
Adaptation objectives and planning	<p>Goal 1: Develop a National Adaptation Plan as part of implementing the NCRP by 2020</p> <p>Goal 2: Take into account climate consideration national development, sub-national and sectoral policy framework by 2020/2025</p> <p>Goal 3: Build the necessary institutional capacity for climate change response planning, by 2025/2030</p> <p>Goal 4: Develop an early warning system for key climate adaptation sectors by 2025/2030, and reporting as part of a National</p>	<p>National Development Plan, sectoral plans and any future variants thereof will form the basis for development planning - the NCCRP continues to be the guiding principle.</p> <p>Flexible and adaptive sectoral policies that will increase institutional capability to implement climate change adaptation programmes and projects; in anticipation of adaptation being a global obligation.</p> <p>High level implementation of catalytic adaptation programmes and projects</p> <p>Development of national framework for vulnerability and needs assessment well before 2020.</p>	<p>\$US 0.17bn per annum</p>	<p>Achievement of these goals requires an international climate change agreement that supports a continuous refinement of South Africa's INDC, for rolling five year implementation periods 2016-2020, 2021-2025, 2026-2030.</p>

¹ UNFCCC Article 4 contains commitments, including those by all Parties on measures to facilitate adequate adaptation to climate change (4.1b) and developed country assistance to vulnerable developing countries to meet the costs of adaptation (4.4). Article 12 relates to communication, including steps taken and envisaged by Parties to implement the Convention.

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Element	Undertaking for the period 2021-2030	Assumptions / Methodologies	Adaptation investment needs (2021 – 2030)	UNFCCC context
	Adaptation Strategy with rolling five-year implementation periods			
Adaptation needs and costs.	<p>Goal 5: Development of a vulnerability assessment and adaptation needs framework by 2020 to support a continuous presentation of adaptation needs</p>	<p>Damage costs associated with high impact climate events (wild fires, storms, droughts and floods), including both direct and downstream costs were calculated. These were estimated for the present-day climate and for the near-future under low and moderate mitigation scenarios.</p> <p>Emission scenarios considered are RCP 8.5 (low mitigation) and RCP 4.5 (moderate-high mitigation). The costs estimated are in terms of the 10th and 90th percentiles of annual costs occurring within the periods of interest.</p> <p>Annual costs were calculated for 2021-2030 and 2021-2040. Sectors covered; Water, Agriculture, Forestry, Energy, Settlements, Biodiversity, Disaster Risk Reduction (DRR)</p>	<p>Annual costs range for the period 1971-2000: \$US 0.4 bn to \$US 22.8 bn</p> <p>Annual costs range for the period 2021-2030: Low mitigation scenario: \$US 0.42 bn - \$US 30.8 bn; whereas in a high mitigation scenario: \$US 3.4 bn - \$US 29.8 bn</p> <p>Annual costs range for the period 2021-2050: Low mitigation scenario: US\$ 0.2 bn - \$US 53.1 bn whereas in a high mitigation scenario: \$US 0.2 bn– \$US 50.0 bn</p>	SA recognises that support will be necessary to implement its National Adaptation Plan and Strategy
Adaptation investments	Goal 6: Communication of past investments in adaptation for international recognition	Development & implementation of a monitoring and evaluation framework, which includes indicators, for tracking domestic investment	Domestic investment into capacity to facilitate climate change adaptation increased from	Investments are subject to an international agreement that provides upfront information on support available for adaptation in the context of Article

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Element	Undertaking for the period 2021-2030	Assumptions / Methodologies	Adaptation investment needs (2021 – 2030)	UNFCCC context
		<p>and tracking of international support.</p> <p>Adaptation investments were gleaned from official annual reports. The years covered are 2010 – 2015.</p>	<p>\$US 0.26 million to \$US 1.1 million from 2011 to 2015</p> <p>Implementation investment increased from \$US 0.71 bn to \$US 1.88 bn from 2010 to 2015.</p> <p>Support from the international financial mechanisms : Adaptation fund: \$10 Million; UNEP: \$3.5 Million</p>	<p>4.7 and an assessment of adequacy support <i>vis a vis</i> needs</p> <p>SA is willing to report on a 5 year ex-post cycle, subject to CoP determined rules that build on existing reporting mechanism/instruments</p>
Equity considerations in adaptation	<p>South Africa views adaptation as a global responsibility in the light of Article 2 of the Convention as further codified in the UNFCCC as a temperature goal. Further understanding climate impacts as being driven by global action/inaction on mitigation, the adaptation burden is therefore a global responsibility, which requires international cooperation in accordance with principles of the Convention. It is in that light that South Africa considers its investments in adaptation as a contribution to the global effort, which should be recognised as such. Further information is provided in the equity section of the INDC.</p>			

3. Mitigation component of the INDC (M-INDC)

South Africa communicates, as defined in national policy, a peak, plateau and decline GHG emissions trajectory range, with emissions by 2025 and 2030 in a range of between 398 and 614 Mt CO₂-eq. This is the benchmark against which the efficacy of mitigation actions will be measured. The table below outlines elements in para 14 of 1/CP.20, further specifying the mitigation component of South Africa's INDC, with supplementary information following the table adding further clarity.

Reference point (including, as appropriate, a base year)	Peak, plateau and decline (PPD) is an emissions trajectory after mitigation. The starting point for PPD is 2016.
Time frames and / or periods for implementation	The time-frames are 2025 (firm), 2030 (indicative) and 2050 (aspirational). The trajectory range is consistent for 2025 with 42% deviation below business as usual emissions growth trajectory. By specifying that 2030 is an indicative range, SA retains flexibility to define a single number for 2030 in future. The INDC reflects SA's full mitigation potential.

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	<p>SA envisages five-year periods of implementation at the national level for policy instruments under development, including a carbon tax, desired emission reduction outcomes (DEROs) for sectors, and company-level carbon budgets. Implementation periods are expected to be 2016-2020, 2021-2025, etc.</p> <p>Our aspiration in the long-term is that total annual GHG emissions will be in the range of 212 to 428 Mt CO₂-eq by 2050, having declined in absolute terms from 2036 onwards. The long-term is important as a policy signal, but South Africa reserves the right to adjust the long-term goal in its national policy, as further information becomes available on, <i>inter alia</i>, the science, what others are doing, technologies available, socio-economic implications, opportunities in the low-carbon economy, as well as the outcomes of the 2015 Agreement.</p>
<p>Scope and coverage</p>	<p>Economy-wide, all sectors, six greenhouse gases (GHGs), with a material focus on three GHGs: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Sources considered are the ones in the latest GHG inventory (see below).</p> <p>IPCC major categories: energy, IPPU, waste and AFOLU (agriculture, forestry and other land use). Increased disaggregation over time enabled through reporting by the private sector.</p>
<p>Planning processes, assumptions and methodological approaches including those for estimating and accounting for anthropogenic greenhouse gas emissions and, as appropriate, removals</p>	<p><i>Planning processes:</i> The approach to the current INDC is based on national climate policy (NCCRWP) and national development plan (NDP). Legislation related to climate policy and a carbon tax that is under consideration and will require approval by Parliament.</p> <p><i>Assumptions:</i></p> <p>In accordance with the Convention, it is assumed that the extent to which developing country Parties will effectively implement their commitments will depend on the effective implementation by developed country Parties of their commitments under the Convention related to financial resources, capacity building and transfer of technology and will take fully into account that economic and social development and poverty eradication are the first and overriding priorities of the developing country Parties. In this context, the INDC assumes the finalisation of an ambitious, fair, effective and binding multilateral agreement under the UNFCCC and its Kyoto Protocol at COP 21 and CMP 11 in Paris that further elaborates these commitments. This level of effort will enable South Africa's greenhouse gas emissions to peak between 2020 and 2025, plateau for approximately a decade and decline in absolute terms thereafter.</p> <p><i>PPD range:</i> South Africa's national climate change response white paper (policy approved by Cabinet) "details the 'peak, plateau and decline trajectory' used as the initial benchmark against which the efficacy of mitigation actions will be measured". This is the PPD trajectory range in the INDC. Values for key years are specified in the NCCRWP. Initial detailed studies of mitigation potential (2007) informed the above, with a base year 2003 for projections; these have been updated (2014; base year 2010), with the intention of on-going updating and improvement. On-going assessment of mitigation potential and its realisation will enable South Africa to move from mitigation potential to implementation.</p>

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	<p><i>Methodologies for Estimating Emissions:</i> 2006 IPCC guidelines</p> <p><i>Metric applied:</i> 100-year Global Warming Potential, as in the IPCC's 4th Assessment Report (AR4). Note that the current GHG inventory, consistent with the 2006 IPCC guideline reporting requirements used GWPs from the Third Assessment Report (TAR) and indicated that future inventories will use GWP values from AR4.</p> <p><i>Approach to AFOLU:</i> Agriculture, forestry and other land use (AFOLU) is included as one of the major IPCC category. The greater uncertainty in AFOLU emissions should be noted, as well as the intention to reduce uncertainty over time</p>
<p>How the Party considers that its intended nationally determined contribution is fair and ambitious, in light of its national circumstances, and how it contributes towards achieving the objective of the Convention as set out in its Article 2</p>	<p>South Africa has assessed whether its contribution is fair and ambitious. A relative fair share of aggregate commitments required to limit temperature increase to below 2°C above pre-industrial levels requires understanding of what others will do, and an equitable effort-sharing paradigm. SA is committed to a response to climate change based on science and equity, and this informs its INDC.</p> <p>We consider that equity applies to mitigation, adaptation and support for both. Hence further details on equitable access to sustainable development are outlined below.</p> <p>Substantial global emission reductions are needed to keep the global temperature rise well below 2°C, and the PPD trajectory range contributes at a national level to bending the curve of growing emissions – in the context of addressing poverty – and presents a trajectory that is consistent with a just transition to a low carbon future.</p> <p>IPCC AR5 has provided relevant scientific information on the limited remaining future global carbon budget. Carbon budgets are an important form of flexibility at the national level; if emissions are below the benchmark trajectory in a given year, they can exceed it in another year.</p> <p>Analysis by SA experts, applying Convention principles of responsibility, capability and sustainable development, yielded a carbon budget that is larger than the PPD trajectory range. It is accepted that other analyses yield different results. SA is willing to engage further on relative fair efforts and ambition, if others do so as well. Transparent information, especially from those with greater responsibility and capability, is critical so that we all do more.</p>

4. Support component of INDC (S-INDC)

The S-INDC comprises of indicative support required for both adaptation and mitigation, based on an analysis of specific sectors and initiatives. Support is required in the form of finance, technology and capacity-building.

In the recent past (2010 to present), South Africa has invested in adaptation, with an increasing expenditure pattern over time. This has been for building

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national capacity, only in the coordinating ministry, from US\$ 0.28m to US\$1.2m from 2010 to 2015. Over the same period, increases in total annual investment were from US\$ 0.18 - \$US 0.59 bn per year in Agriculture and Forestry sectors; from US\$ 0.23bn - US\$0.36 bn in the Energy sector, US\$0.01 bn - \$US 0.02 bn in Human Settlements; from US\$ 0.03 bn - US\$ 0.05 bn in Biodiversity; from US\$ 0.17 bn - US\$ 0.59 bn in Water; and from US\$0.02 bn - US\$ 0.7 bn in Disaster Risk Reduction. Total investment in adaptation increased from \$US 0.64 bn to \$US 2.31 bn from 2010 to 2015.

Some of the key programmes requiring scaling-up going forward, particularly beyond 2020 include,

1. Working for Water (WfW) and Working on Fire estimated at US\$1.2bn
2. Working on Wetlands estimated at US\$0.12bn
3. Water Conservation and Water Demand Management estimated at US\$5.3bn
4. LandCare estimated at US\$0.07bn

SA has already made significant investments in mitigation. The Department of Energy as part of a Renewable Energy Independent Power Producer Procurement Programme (REI4P) has approved 79 renewable energy IPP projects, total 5 243MW, with private investment totalling R168 billion. Another 6300 MW are under consideration. Investment in public transport infrastructure was R 5 billion in 2012, and is expected to continue growing at 5% per year. South Africa allocated R1.1 bn in the 2011 and 2012 Budgets to fund "green economy" initiatives and establish a SA Green Fund, which would have to be scaled up in future, including contributions from domestic and international sources.

Analysis of the incremental costs of mitigation actions indicates that significant financing will be required in the long-term. The following estimates are of total incremental investment required, derived from energy systems and economic modelling:

1. Estimated incremental cost to expand REI4P in next ten years: \$3 billion per year
2. Decarbonised electricity (renewable energy and nuclear power) by 2050 - estimated \$ 349 billion over 2010 to 2050
3. CCS: 23 Mt CO₂ from coal-to-liquid - \$0.45 billion
4. Electric vehicles - \$513 billion over 2010 to 2050
5. Hybrid electric vehicles: 20% by 2030 - \$488 billion

Some of the technologies that could help SA reduce emissions significantly have been identified to include: Energy efficient lighting; Variable speed drives and efficient motors; Energy efficient appliances; Solar water heaters; Hybrid

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electric vehicles ; Solar PV ; Wind power; Carbon Capture and Sequestration; Nuclear ; and Advanced biofuels.

South Africa is implementing a mitigation system. To move from analysis of mitigation potential to implementation, human and institutional capacity need to be further enhanced. The information on investments estimated in energy and economic models indicates that relatively small impacts on GDP, which can be ameliorated by wise expenditure. Other socio-economic implications, notably on employment, need to be avoided and will be studied empirically as further mitigation measures are put in place. Such analysis should be further enhanced by financial analysis of specific investment proposals. The COP should consider a process for improvement of information on investments required, and how this can be integrated in existing reporting by developing countries. The international frameworks should operationalize support for existing human, intellectual and institutional capacity enhanced, at the domestic level.

6. Equitable access to sustainable development

South Africa believes that core Convention principles of responsibility, capability and sustainable development are relevant. Equity relates to adaptation, mitigation and support.

Equity in adaptation is essential, as those least responsible for the problem of global climate change are most vulnerable to its impacts - poor countries and communities. Such a disproportionate burden is an injustice. If insufficient mitigation is implemented globally, and temperatures exceed 2 °C, even more adaptation will be required. Those with greater responsibility for cumulative emissions which have driven up GHG concentrations should, as a matter of fairness, assist those less responsible. Despite being responsible for about 1-1.5% of annual global emissions, South Africa is already investing about 6% of what would be the upper end of its adaptation needs per annum for the period 2021/2030, which is a disproportionate burden arising out of a global commons problem.

South Africa is fulfilling its responsibility to its citizens with large investments in adaptation. These have been specified above, and in total represent a significant opportunity cost of investments required to reduce poverty and inequality, create employment, improve education and other, multiple development challenges. SA seeks recognition of its national investment in adaptation as part of its relative fair effort, which have been quantified above. Future investments in adaptation are expected to increase between 5% to 26% for a low mitigation scenario (RCP 8.5, for 2021-2030) relative to past costs (for the period 1971-2000): and 88% to 23% higher for a high mitigation (RCP 4.5) scenario.

Analysis by SA experts indicates that a carbon budget calculated based on indicators consistent with core Convention principles of responsibility, capability

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and sustainable development, could range from 20-22 Gt CO₂-eq for the period 2016- 2050; which is greater than one consistent with the trajectory, which might range from 16-20 Gt, the area under mid- and upper-range PPD.

SA acknowledges that other principle-based criteria can be applied. In this respect, we have examined the results from analytical approaches taken by other experts as well. This includes a analysis by experts from other BASIC countries. The carbon budget approach of Chinese (CASS / DRC joint project team 2011) and Indian researchers (Jayaraman , Kanitkar & DSouza 2011) allocates 7 Gt CO₂ –eq to South Africa for the period 2000–2049, if a starting year of 1850 is assumed for historical responsibility. This increases in the Indian approach to 11 Gt, but this is approximately half of the area under the national trajectory.

Many experts from other countries have applied indicators of equity, using many different models. A meta-analysis of different approaches shows some of the variation, in relation to South Africa's PPD trajectory range. The most striking result is that the analysis of different effort-sharing approaches yields carbon budgets for South Africa that are significantly smaller than the PPD trajectory range. Only lower PPD is within the range calculated using the PRIMARP tool in 2020. In 2025 and 2030, none of the PPD values overlap with the calculated ranges. In the longer-term, that is a period of absolute decline of GHG emissions to 2050, the mid- and lower-range PPD values are within the range calculated by Climate Analytics using the PRIMAP tool;² but upper PPD still exceeds what is required as a relative fair share by SA and to stay below 2 °C.

Equity also relates to provision of the means of implementation. Generally, SA needs time for development that is necessary to reduce poverty – at the same time as seeking to contribute to mitigation and assist our poor communities in adapting to climate impacts. Some specific needs for support for both adaptation and mitigation have been initially quantified above.

7. Uncertainties

Uncertainty should be noted in two respects. The greater uncertainty in AFOLU emissions (relative to other sectors) has been noted above. SA's current understanding is that our land sector is estimated to be net sink. The intention is to reduce uncertainty in data over time, with a view to a comprehensive accounting approach for land-based emissions and removals. Secondly, trace

² <http://www.climateanalytics.org/publications/analysis-fair-mitigation-contribution-south-africa>

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gases are less material and data more uncertainty than for the three major gases. For the current GHG inventory, submitted to the UNFCCC as part of SA's first biennial update report (2014), data was gathered for CO₂, CH₄ and N₂O. Certain HFCs and PFCs were reported on in the IPPU (industrial processes and product use) sector. Fluorinated gases are estimated to have contributed less than 0.3% to the total GHG budget over the period 2000 – 2010. Discussions are under way to estimate SF₆ emissions from power generation.

Uncertainties exist in the adaptation methodology used to estimate costs. These methodologies can be further improved and will benefit from exchanges with others using similar methodologies. Further information on the methodologies used to inform this methodology section can be found in technical background documents.

8. Progress

South Africa is willing to account for progress in achieving its INDC under the UNFCCC. A fundamental basis for such assessment is the reporting of regularly updated GHG inventories. SA has submitted inventories for 2000-2010 in its first biennial update report (2014), and notes that we have enhanced reporting from no specified frequency to every two years. Comparability and review of INDCs among peers is important; as is the assessment of the aggregate effects of all INDCs against what is required and distributional equity. South Africa agrees that there should be a positive 'direction of travel' for all countries, and this INDC represents "a progression beyond the current undertaking", indicating SA's compliance with what was agreed in Lima.
