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Dear Mthunzi

**Further comment on draft South African Renewable Energy Masterplan (July 2023):
Gender equality, gender justice and women’s participation**

1. This is an additional comment on the Draft Renewable Energy Masterplan (“SAREM”) to the written submission sent on 31 July 2023 by [groundWork](#), [Earthlife Africa](#), the [Centre for Environmental Rights](#) as part of the [Life after Coal Campaign](#). This comment relates specifically to the issue of gender equality, gender justice, and women’s participation – with the aim of promoting not only women’s Constitutional rights, but also the promise of procedural, distributive and restorative justice contained in the Just Transition Framework adopted by Cabinet in June 2022.

“We also have an unprecedented opportunity to turn a green energy movement into a gender equality revolution.”¹

Context and literature overview

2. The [Just Transition Open Agenda](#), developed by the Life After Coal campaign in collaboration with environmental justice community groups, identifies gender justice as a precondition for a just transition. It specifies that “the path to a just transition must be one rooted in the principles of gender justice. This will mean taking into consideration the legacy of gender discrimination and its effects in society, as well as the realities of the care burdens of women in society and the ongoing, pervasive nature of gender-based violence. A just transition will be one that has women leaders at the forefront of decision-making, as well as implementation.” Gender justice is a cross-cutting issue and must be incorporated into all aspects of a just transition, ensuring that all decisions must be made with a gendered lens; all processes and decisions must take into consideration that the perspectives of women and non-gender conforming people; that land ownership by and job creation for women and non-gender conforming people must be prioritised.²
3. Gender justice and women’s equality are not policy choices - they are Constitutional rights and obligations. Women have the right to equality, which includes “the full and equal

¹ <https://www.edie.net/putting-equality-and-development-at-the-heart-of-a-clean-energy-transition/>

² [Just Transition Open Agenda, 2022](#)

enjoyment of all rights and freedoms", and protection from discrimination under the Constitution (section 9). Many other Constitutional rights are implicated by the transition.

4. While women are often mentioned in policy documents linked to energy and just transition,³ achieving gender equality and justice in any initiative only happens by deliberate design. In the context of systemic patriarchy and women's systemic exclusion from opportunities, treating women's participation and gender equality as an afterthought will result only in the preservation of the status quo of patriarchy and unequal treatment, marginalisation and exclusion of women, box ticking and lip service. Maseko⁴ writes:

"Given the structural characteristics, the status quo will not change unless it is intentionally challenged and changed. Women's economic exclusion, lack of power and the resulting exclusion from decision-making will not change simply by moving to more sustainable production processes and using renewable energy. Rather, steps must be taken, and processes put in place to ensure that women are not left behind by the transition. The transition must therefore be gender just."

5. **Gender equality and better outcomes for women in the renewable energy (RE) sector will only be realised through making it a key outcome of the SAREM, and by articulating a deliberate strategy and activities to achieve that outcome, against measurable targets.**

6. Women experience the transition from fossil fuels differently from the male counterparts, and often bear a heavier part of the negative impacts of the transition; furthermore, existing inequalities and discrimination inherently limit their ability to take up opportunities in the renewable energy sector – and other new opportunities in the green economy.⁵
7. To achieve distributive gender justice in the transition means the burdens must be borne equally by people of all genders, and the benefits must be shared equally between people of all genders. Already, women have borne the brunt of the social and environmental impacts of fossil fuels without enjoying an equal share of benefits (such as they were). Now, on the doorstep of the opportunity offered by the RE sector and value chain, existing inequalities and discrimination threaten to inherently limit their ability to take up opportunities in the RE sector – and other new opportunities in the green economy (see more below).⁶
8. Prioritising women's equality in the just transition contributes to better social justice outcomes overall. For example, focusing on gender equality means focusing on the unemployed, most of whom are women. Strengthening the anti-discrimination regulation of the workplace will promote workplace equality generally, which will in turn allow private and public employers to benefit from women's skills, experience, work and insights that make business more resilient. Supporting after-school care and early childhood development centres benefit the safety, general wellbeing and development of children, while enabling women to participate in the workforce (Maseko⁷ quotes the example of

³ See, for example, the DMRE's Draft Just Transition Framework, which mentions mitigating impacts on vulnerable groups such as youth and women associated with fossil fuel value chains, as well as access to modern energy services; the Just Energy Transition Investment Plan, 2022

⁴ Maseko, N. "Just transition in South Africa: the case for a gender just approach", TIPS Policy Paper 2021

⁵ <https://www.worldbank.org/en/topic/extractiveindustries/publication/just-transition-for-all-a-feministapproach-for-the-coal-sector>

⁶ Maseko, N. "Just transition in South Africa: the case for a gender just approach", TIPS Policy Paper 2021

⁷ Maseko, N. "Just transition in South Africa: the case for a gender just approach", TIPS Policy Paper 2021

Chile, where the provision of after school programmes for school-age children increased women's labour force participation by 7%, and increased women's employment by 5% in Chile.)

9. In South Africa in 2022, it is reported that women accounted for just 31% of the employees of Eskom and 21% of the workforce in the coal sector.⁸ In South Africa's renewable energy sector, women accounted for only 14% of employees. "Despite this, female employees are usually better educated than their male colleagues (e.g., 67% of females compared to 49% of males at Eskom hold a post-matric qualification), which results in [women] holding proportionately higher positions despite being underrepresented in absolute terms."⁹ The draft South African Renewable Energy Masterplan published for comment in July 2023 (draft SAREM) reported that "over BW1-4 of the [REIPPPP], women held 10% of opportunities (in percentage of job-years)."¹⁰
10. A 2022 IFC Report entitled "Women's Participation in The Renewable Energy Workforce in sub-Saharan Africa: Identifying Barriers and Opportunities for Women as Leaders & Employees" identified the following barriers to women's participation in the RE workforce in sub-Saharan Africa: Workplace policies and practices; social norms and gender stereotypes; an legal barriers. This report contains a number of recommendations for RE companies to promote women's participation and leadership in the companies.
11. The International Renewable Energy Agency (IRENA) has also produced a number of reports on gender in RE globally, including "[Renewable Energy: A Gender Perspective](#)" (2019); "[Wind energy: A gender perspective](#)" (2020) and "[Solar PV: A Gender Perspective](#)" (2022). Globally, IRENA found that the solar PV industry had the highest share of full-time women employees, reaching 40% in 2021.¹¹ All three these reports contain recommendations for greater inclusion of women in the industry.
12. A quick desktop study did not identify comprehensive data on women's ownership of businesses operating in the South African RE sector, but the draft SAREM reported that: the share of expenditure channelled to women-owned businesses was 5% over the first four bid windows, achieving 5% for construction and 6% for operations on average, compared to the target of 40% set by the Department of Women, Youth and Persons with Disabilities. These low figures require further analysis, but clearly, building development capacity and facilitating access to finance will require dedicated support from both the state and the financial sector.
13. The [Women's Economic Assembly Initiative \(WECONA\)](#), a multi-stakeholder initiative to advance women's economic empowerment and inclusion through a national programme actioning enabling procurement environment by activating public and private sector supply value chains for a coherent and collaborative approach to achieve women's economic empowerment,¹² was born from the Gender-Based Violence and Femicide National Strategic Plan. On its website, WECONA provides more detail about the reasons for women's exclusion from energy procurement: "In the energy sector, bid windows are structured in such a way that only companies with high balance sheets, and years of

⁸ Noting that the Sector Jobs Resilience Plan for the Coal Value Chain (TIPS, 2020) recorded that under 15% of workers in the coal value chain were women (at p.10).

⁹ 2022. Opportunities and barriers for women in South Africa's energy transition. Research Institute for Sustainability Helholz Centre Potsdam. <https://www.rifs-potsdam.de/en/blog/2022/09/opportunities-and-barriers-women-south-africas-energy-transition>

¹⁰ At p.27

¹¹ <https://www.irena.org/News/pressreleases/2022/Sep/Solar-PV-Employs-More-Women-Than-Any-Renewables>

¹² <https://wecona.org.za/about-us/>

experience can apply for new opportunities. This practice advantages international companies with large balance sheets, while women who have individual track records are excluded. Furthermore, the sector neither has a Masterplan nor a Charter, which means that there are not agreed industry transformation targets. With new opportunities for own production in the green energy space, this means large companies will have no responsibility to ensure that new opportunities are targeting women.”¹³

What is currently in the draft SAREM

14. In the draft SAREM, women’s participation only appears in the context of overall transformation of the RE sector, or in relation to skills gaps:

- “As the B-BBEE scorecard is developed, particular attention will be paid to align with national strategies on the inclusion of women, youth and persons with disabilities”, p.27
- “Align with the Execution Plan for the Women’s Economic Assembly Initiative (WECONA): c”, p.29. Although WECONA is outspoken about women’s exclusion from the energy sector on its website (see above), the execution plan for WECONA is not accessible, so it is not clear what these requirements are.
- “Align with the DMRE’s [Women Empowerment and Gender Equality Strategy for the Energy Sector](#)” for 2021-2025 p.29 (“the DMRE Gender Strategy”). This Strategy is a comprehensive and aspirational plan for progressing gender equality in the energy sector overall. This Strategy also deals with some of the workplace issues – both promoting inclusion and empowerment and eliminating discrimination – that are raised in the IRENA reports referenced above. The Strategy is not specific to the renewable energy sector, but it is highly relevant to SAREM.
- “The lack of skills on the local market is the primary constraint to the development of the industry. In addition, skills retention, particularly of young professionals, appears problematic. This is primarily a result of the mismatch between the limited supply and rising demand of skills in the industry. These challenges are compounded by the lack of inclusivity and integration of previously-disadvantaged individuals in the sector, particularly women.” p.30
- Although the draft SAREM does not mention women specifically, the “second avenue” of the action plan under “Fostering Inclusive Development” describes facilitating the integration of new entrants into the various stages of the renewable energy and storage value chain, with specific emphasis on SMME support programmes,¹⁴ as well as efforts by Original Equipment Manufacturers have made a positive contribution but remain insufficient.
- Draft SAREM also envisages a Transformation Fund, aimed at providing capital, but also support guarantees and warranties (and possibly other support required by beneficiaries), for emerging suppliers into the sector will be established. It will aim to catalyse existing (and additional) funding streams in the sector.
- Lastly, the draft SAREM describes “an extended focus on supplier development, starting with the launch of the Strategic Partnership Programme (SPP) by the SAEEC and the dtic with an initial 8 companies in the renewable energy and storage value chains. The SPP is a cost-sharing programme (up to 50:50 basis) of the dtic, aimed at incentivising large private-sector enterprises to support, nurture and develop the capacity of SMMEs within their supply chain.” (p.28)

¹³ <https://wecona.org.za/about-us/>

¹⁴ “Existing SMME support programmes by the DSBD (such as the Small Enterprise Manufacturing Support managed by the Small Enterprise Finance Agency), the IDC (such as the Khoebo Innovation Promotion Programme, SME-Connect, the programme for SME and MIDCAP companies) and a number of other institutions”

15. The challenge is, as always, how to ensure that these initiatives are in fact implemented, and that women in fact benefit substantially.
16. The DMRE Gender Strategy highlights the following risks facing its own implementation, all of which are relevant to SAREM:
- Gender not seen as critical by all DMRE staff and managers and energy sector as a whole.
 - Lack of commitment to the financial and human resources required to implement.
 - Lack of understanding of the value of women's empowerment and gender equality on the bottom line.
 - Shifting the responsibility for gender to under-resourced and illequipped offices.
 - No clear lines of responsibility and accountability.
 - Lack of leadership interest and commitment.
 - Patriarchal and sexist society where strategies of this nature are not given the necessary recognition and support.
 - Not understanding the substantive value gender equality can add to the business bottom line.
 - Internal capacity of DMRE gender focal staff, which is affected by large workload being implemented by a small team with crosscutting responsibilities.
 - Limited financial resources may affect the ability to implement all the identified actions.
 - Private sector resistance that will affect the ability to drive change in this sector.
 - Follow through on commitments in the strategy.
17. Enablers identified by the DMRE Gender Strategy include the following particularly relevant to SAREM (and looking beyond those related to the DMRE itself):
- Commitment to women's empowerment through B-BBEE commitments.
 - Allocation of the financial and human resources required.
 - Accountability clearly defined.
 - Monitoring of progress integrated into executive and board meetings.
 - Existing research and programmes that support women's advancement in the workplace and business.
 - Compliance to the Revised Preferential Procurement Regulations.
18. What is evident from the DMRE Gender Strategy is that **bold levers and incentives** will be required to achieve real change for women in the RE sector. Some practical proposals are listed below, but in line with the principle of procedural justice, **women must be part of the process and co-design these initiatives** that so closely affect them.

Preparing women for taking up opportunities in new sectors, including RE

19. Maseko argues that just transition employment must be conceptualised as jobs beyond RE, and that the separation of the green economy from the rest of the economy is not promoting justice. Recommendations described in the literature include:
- 19.1 Conceptualising just transition employment as jobs beyond RE - reducing the separation of the green economy from the rest of the economy (Maseko, 2021)
- 19.2 Promoting women's entry into science, technology, engineering and mathematics (STEM) fields, starting in primary education and carrying through to tertiary education and post-qualification opportunities (Maseko, 2021). This is an enormous objective, and will require a broad range of initiatives from a range of roleplayers in the education sector.

- 19.3 Intake into skills development programmes such as those envisaged in the JET-IP and the draft SAREM must ensure at least equal representation of women.¹⁵
- 19.4 Large-scale funded programmes to train women in technical fields in which they have historically been underrepresented. See for example the electrical engineering Renewable Energy Specialisation Skills Development Programme was launched earlier this year in Standerton - a partnership between the Energy and Water Sector Education and Training Authority, and Power Africa, a US government initiative co-ordinated by USAID. The programme reportedly supports 100 unemployed, young women learners, as well as 15 Technical Vocational Education and Training college lecturers from Gert Sibande, Nkangala and Ehlanzeni, to undergo training towards the attainment of a National Certificate: Electrical Engineering: Renewable Energy, NQF Level 3.¹⁶

Removing barriers to and creating opportunities for women in new sectors, with particular focus on RE

20. Recommendations described in the literature include:

- 20.1 A state-led programme to incentivise businesses to train women in technical fields, hire those women, promote them and pay them equal wages. (Maseko, 2021). One way to do this is to link employment of women to subsidies or tax relief for RE companies. In Nigeria, [it is reported](#), companies can only access certain subsidies if it employed at least 40% women.
- 20.2 Promoting industrial and business capacity for women to facilitate access to funding, additional training programmes and through access to mentorship programmes. (Maseko, 2021). This kind of programme could be led by industry association, with state support.
- 20.3 Promoting employment of women in the RE sector: For example, in East Africa, the [Women for Green Jobs initiative](#) is training and placing women directly into jobs within 40 green energy companies across six countries in sub-Saharan Africa. "The goal of this effort is to develop large, sustainable talent pools of women, to incentivize and support energy companies in the hiring and retention of female talent, and to develop an open-source database that will continue to be used by green energy companies after the duration of this grant. [The host organisation] Shortlist will initially place 750 women in jobs through a wage subsidy scheme and anticipates an additional 15,000 women will be placed in green energy positions over the next few years."
- 20.4 Improving and expanding existing early childhood development programmes and improving on the existing subsidy provided to care centres for early childhood development programmes for children who fall within the means test. (Maseko, 2021). This obviously requires action by other state roleplayers like the Department of Social Development and the RE industry itself, but all the literature refers to the provision of ECD and childcare services as critical for success.
- 20.5 Improving workplace policies and working conditions for women feature strongly in the literature, including inclusive hiring practices, employment benefits like paid parental leave and childcare services for employees. See this framework by USAID entitled "[Delivering Gender Equality: A Best Practices Framework for Male-Dominated Industries](#)", as well as specific recommendations in the 2019 IRENA report [Renewable Energy: A Gender Perspective. IRENA, Abu Dhabi](#) (and the

¹⁵ This includes: The skills hub or platform for the 'Just Energy Transition and the Future of Work' and training that will form part of the pilot skills development zones (SDZs) in Mpumalanga, Eastern Cape, and Northern Cape (JET-IP, at 101-103).

¹⁶ <https://www.itweb.co.za/content/G98YdqLGykkMX2PD>

- sector specific reports by IRENA in 2020 and 2022). Improvements in workplace policies and conditions are also a strong feature of the DMRE Gender Strategy.
- 20.6 Promoting small business development opportunities for women in RE. For example, in Sierra Leone the Solar Harnessed Entrepreneurs (SHE) project aims to provide women groups and individual run enterprises with a package of support, including financing for energy-enabled appliances, training in their use and an enhanced market access and linkages with the aim to leverage the new access to energy for business growth. The ideal setting of the project is to cover over 330 newly enabled businesses by engaging 7,120 women, living in Sierra Leone's mini-grid locations. This project is still in the early phases of implementation, but provides some ideas for what is possible.
 - 20.7 Providing or facilitating dedicated access to finance and development support for women to invest in and manage larger developers and other businesses operating in the RE sector – for further review and discussion.

Recommendation

21. It is recommended that SAREM expressly elevates the issue of gender equality, justice and women's participation in the document, and frames the development of the RE sector as an opportunity to address inequality and discrimination, and women's empowerment.
22. While it is understood that the adoption of SAREM will be followed by an implementation process including establishment of a project management unit, it is recommended that SAREM, at the very least, charts a consultative process for setting ambitious targets and incentives for:
 - 22.1 training and bursary opportunities for women graduates and girl learners (promoting study in STEM subjects);
 - 22.2 women's employment in the sector (see for example the use of access to state support conditional upon women's employment described above);
 - 22.3 women's representation at management level in the sector (for example, as proposed by the DMRE Gender Strategy, striving for 50% of women in senior and executive management), which must include their employment and management presence in the proposed project management unit for SAREM;
 - 22.4 adoption of gender inclusive workplace policies for the sector, including childcare support, and punitive measures for dealing with sexual harassment and gender-based violence (recommended by the DMRE Gender Strategy);
 - 22.5 support for networking and peer mentoring programmes in collaboration with industry (examples include the local network [WE Connect](#); and internationally the [Women in Wind Global Leadership Programme](#); and the [Global Women's Network for the Energy Transition](#) (there may be others);
 - 22.6 support for women owned and operated social ownership and SMMEs, including through the Transformation Fund proposed in the draft SAREM;
 - 22.7 access to finance to enable women's ownership in larger enterprises in the sector, including through the proposed Transformation Fund; and
 - 22.8 measures to incentivise women's participation in the sector supply chains – whether through the proposed B-BBEE Scorecard, the revised Preferential Regulations for the sector or otherwise.
23. The implementation of SAREM must be supported by a **budget** that is responsive to the needs of women and include specific resources to improve gender equality. This includes investing in **monitoring and data collection** about women's participation, representation and benefits, including baseline studies (as proposed by the DMRE Gender Strategy).



Yours sincerely,
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On behalf of the Life after Coal Campaign