



Commission for Gender Equality
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Paris Agreement: Gender mainstreaming in NDC Enhancement in South Africa DRAFT Gender Action Plan (GAP)

Commission for Gender Equality Comments

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1. Introduction

The Commission for Gender Equality ('CGE') wishes to express its gratitude for the opportunity to give input on the Draft Gender Action Plan.

The CGE, as an independent statutory body created in terms of Chapter 9 of the Constitution of the Republic of South Africa, 1996 ('the Constitution'), is mandated to promote and protect gender equality in government, civil society, and the private sector.

The Commission for Gender Equality Act 39 of 1996, ('the CGE Act'), gives the Commission the power to:

- Monitor and evaluate policies and practices of organs of State at any level.
- Monitor and evaluate statutory bodies and functionaries.
- Monitor public bodies and authorities and private businesses, enterprises, and institutions to promote gender equality.
- Make any recommendations that the CGE deems necessary.

The CGE welcomes the opportunity to make inputs into the Draft Plan and shall reiterate the proposed sections of the Bill and respond thereto.



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2. Background

Despite very minimal contribution to global greenhouse gas emissions, South Africa suffers from the effects and consequences of numerous climate change impacts. Given the impact that the effects and consequences of climate change have on South Africa, it is important that the country takes effective measures to enable conditions that support the implementation of gender-responsive climate actions, and the gender-responsiveness of adaptation and mitigation actions in different sectors.

The Department of Forestry, Fisheries and the Environment (DFFE) has drafted a Climate Change Gender Action Plan, 2022. This draft seeks to, *inter alia*, review the lack of institutional arrangements facilitating gender mainstreaming concerning climate change and the nationally determined contributions (NDCs). It also seeks to address the exclusion of genders issues from sectoral umbrella policies and sub-policies. It further provides a detailed analysis including discussions with key sector government officials.

In this submission, the CGE will comment on the content of the draft GAP and provide input on it.



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3. Commission for Gender Equality's submissions on the plan

3.1 *General Comments on the draft GAP*

In order to develop measures enabling conditions that support the implementation of gender-responsive climate actions, a comprehensive analysis of these enabling conditions needs to be undertaken. However, there is little in the draft GAP that addresses this and it does not fully deal with how policy on the issue is to be actioned.

The draft GAP lacks definitions in the background section referring to the technical terms of climate change and its gender implications. It must take into account how it will represent women in all their diversity, e.g. rural women and other multiple groups of women.

The draft GAP lacks context and does not elaborate in detail on climate change and how it affects women and minority groups. It is silent on the energy crisis facing women which also has climate change implications and is not rooted in historical inequalities. Women in rural areas have not experienced the advancements that many have experienced, and their interests must find expression in the plan.

The draft GAP proposes focus group discussions when raising awareness under clause 2.9.3 of the plan. It is critical to capacitate women and minority groups on the terms and concepts of energy scarcity and other



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related terms to climate change. Benchmarking in respect of the environmental best practices of other countries is also essential.¹

Furthermore, although the plan addresses socio-economic issues, it lacks transformation and implementation in respect of women, youth, and persons with disabilities. This must be considered in conjunction with, and married to, the Disaster Management Act 57 of 2002 which it does not.

3.2 *Purpose of the draft GAP and Gender Mainstreaming*

Mainstreaming gender into the climate change policy framework through the Gender Action Plan is important for South Africa's climate response. Doing so will further ensure the effectiveness, fairness, and sustainability of the country's climate policy and action. However, the GAP should not solely be based on gender mainstreaming.

It is also important that the GAP is inclusive of women in the entire climate action plan processes to address climate change. It is generally expected that climate change will worsen in the short-term at least, which will exacerbate poverty and inequalities that already exist, and which impacts on women particularly. These adverse effects are not only economic and physical, but also social and impact women and men differently due to gender disparities in sociocultural and economic roles and obligations.

¹ <https://www.theguardian.com/world/2023/dec/12/pacific-islands-tourism-the-price-of-paradise>



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Therefore, including gender considerations in the actual policies and strategies related to climate change is important as this will ensure equal opportunities for both women and men and enable them to have access to, participate in, and benefit from climate change initiatives across the Nationally Determined Contributions (NDC) priority sectors of the economy.

3.3 *The objectives and strategic actions of the draft GAP*

The strategic actions of the draft GAP are as follows:

- Strategic action 1: revise institutional arrangements for gender-climate mainstreaming.
- Strategic action 2: formalise relationships for sectoral gender mainstreaming.
- Strategic action 3: develop dedicated sectoral gender policies.
- Strategic action 4: establish robust, participatory monitoring and evaluation (M&E) frameworks for gender mainstreaming.
- Strategic action 5: align funding streams for gender-climate mainstreaming.
- Strategic action 6: develop a gender awareness and capacity-building programme.



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Much of the draft GAP's focus appears to be on gender mainstreaming, and there is little in the way of setting out any action plan on the challenges that climate change poses to women. The CGE is of the view that this is one of the GAP's shortcomings and should be addressed in the draft plan.

3.4 South Africa's baseline and climate change and gender-responsive measures

There is little in the GAP that sets out an overview of South Africa's profile, and the specific impact that climate change has on its people, geography, and economy. The purpose of the Gender Action Plan is to facilitate the integration of gender considerations into policies, programmes and strategies related to climate change in order to provide equal opportunities for both women and men and enable them to have access to, participate in, and benefit from climate change initiatives across the Nationally Determined Contributions (NDC) priority sectors of the economy.

In order to fully achieve this, a gender analysis of the status quo is required in order to generate the necessary data/information that would help properly identify the necessary gender considerations for such a plan. Data-driven initiatives must be the center of the plan.

3.5 Implications for the GAP: A multiple-track approach to gender-climate mainstreaming



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The draft GAP in this section recognises the importance of the inclusion of women in climate action to address climate change and in conducting gender analysis. However, the draft GAP does not provide any information on climate change and gender issues as they relate to the various sectors, apart from recognising that there is a policy in the agricultural sector.

Women will be disproportionately impacted by climate change and its impacts. The National Gender Policy Framework states that the implementation of gender equality is first and foremost the responsibility of all the institutions in government.² In order to ensure gender justice, government decisions, policies, laws, plans, processes, and activities must include gender equality considerations.

Climate change is not gender-neutral. Due to the societal roles that women and girl children are expected to play in their communities, especially those who live in communities that are impoverished or disadvantaged, women disproportionately bear the weight of climate change adverse impacts.

Therefore, it is important to identify challenges that are interrelated between climate change and gender inequality in the GAP.

Furthermore, the GAP must create a platform for young black girls from marginalized communities so they can change the climate change

² National Gender Policy Framework. See also Department of Justice and Constitutional Development Gender Mainstreaming Assessment Report Volume 1 available at: https://www.gov.za/sites/default/files/gcis_document/201409/gendermainstreaming0.pdf



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narrative and equity for girls by creating space and platforms to amplify their voices.

To date, there is no evidence that the voices of children and young people have been sought in the development of the draft GAP. To that end, the input of two vulnerable groups will be disproportionately impacted by climate change and its impacts despite having contributed the least to causing global warming, and the environmental impacts of the draft GAP have been excluded from this vital process. This shortcoming must be addressed before any further steps in the process can be undertaken.

4. Recommendations

Given the above concerns, the CGE would recommend the following in regard to the draft GAP:

- 4.1 A comprehensive gender analysis be conducted to ensure that the GAP sets out fully the process of policy-to-action results. The draft GAP needs to identify challenges in the NDC priority sectors related to climate change and gender issues. Furthermore, the draft GAP should include the lived experiences and be based on marginalised groups and their needs e.g. the incorporation of women's needs for energy or increase women's participation in energy-related technical and decision-making roles, processes, and positions.



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- 4.2 A comprehensive analysis of conditions required for implementing gender-responsive climate adaptation and mitigation actions on the ground should be included in the draft plan.
- 4.3 The Action Plan must have the overall goal of facilitating the integration of gender into the NDC priority sectors.
- 4.4 The draft GAP must have a sector-specific action plan to strengthen the inclusion of women in climate action.
- 4.5 The DFFE should embark on a deeper analysis and consideration of the issues and re-draft the GAP by considering the intersectionality of climate change and gender equality.
- 4.6 The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills, and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons (such as women and children) must be ensured. Their involvement is also crucial to ensure that their needs and rights shape accelerated action to tackle climate change. It is therefore important to strengthen the participation and agency of children and young people in climate and environmental-related action.
- 4.7 Women-led organisations and groups that deal with climate change be given a larger role in climate finance.



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5. **Conclusion**

Climate change amplifies existing inequalities such as poverty, hunger, and gender inequality, posing particular threats to the livelihoods, health, and safety of women, girls, and other minority groups. It is therefore important that gender equality considerations be taken into account in the efforts to address climate change and a prerequisite for sustainable climate action. The draft GAP thus requires concepts that define and embrace the challenges and gender implications of climate change.

This applies to any draft GAP intended to give effect to this. Whilst the current draft GAP addresses gender-mainstreaming within the context of climate change, it requires more detail illustrating the current status quo in South Africa on the issue, as well what steps are to be taken to address any gender-related issues that this reveals.

There has been little to no impact monitored through general gender mainstreaming, as a result of fractured policy development and implementation for gender mainstreaming. In order for any policy to be accepted that expressly requires mainstreaming of gender, the current fragmented approach to the implementation of gender mainstreaming must be addressed.



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Additionally, the Beijing Platform for Action, indicates specifically that women's participation is imperative in decision making, especially when they are affected by the decision. As a signatory to the Platform for Action, it remains the duty of the government to realise this platform and to ensure that it is implemented.