

OCTOBER 2025

FOOD JUSTICE FACTSHEET: CLIMATE CHANGE ACT



Using the Climate Change Act to Shape a More Just and Resilient Food System in South Africa

Introduction

In March 2024, South Africa took an important step in its climate policy journey with the passing of the Climate Change Act. As the first piece of framework legislation of its kind, the Act establishes the legal foundation for how the government, at national, provincial, and local levels, must respond to the climate crisis. It sets out requirements for climate response planning, adaptation strategies, and sectoral emission reduction targets that will shape the country's development path for years to come. South Africa's food system is highly vulnerable to climate shocks such as droughts, floods, and heatwaves. At the same time, it is a significant contributor to greenhouse gas emissions that cause climate change. It is therefore critical to ensure that implementation of the Act includes a strong agenda for a just and resilient food system - in how food is produced, distributed, accessed, and consumed.

This factsheet makes suggestions on how a just and resilient food systems agenda can be advanced under the Climate Change Act. It is critical that the needs and voices of those who sustain the food system every day - farmers, workers in the food system (from farms to factories), working-class women, fishers, informal traders, and households - shape the implementation of the Act. The factsheet therefore explains key features of the Act, and the avenues through which these sectors can engage it to advance a just and resilient food systems agenda.

It starts by explaining the relationship between the food system and climate change in South Africa, and the links to different constituencies. The factsheet then describes some of the key aspects of the Act and how it works, before turning to some of the important interventions for a just and resilient food system that farmers, organised labour, informal workers, working-class women, civil society organisations, and the general public can advocate for (but are of course not limited to these). Given this, the factsheet then unpacks key provisions of the Act and how con-

stituencies can participate and leverage these provisions for a climate-just food system that centres the rights and voices of those affected by climate change and food system inequalities. The middle spread of the factsheet provides a summary illustration of key provisions of the Act and possible food system elements.

Climate change and the food system: Importance of the Act to different sectors

South Africa's food system contributes significantly to climate change, accounting for around 20% of national emissions through industrial agriculture, energy-intensive supply chains, and poor waste management. The food system is also highly vulnerable to climate shocks, droughts, floods, and rising temperatures. These are already disrupting maize and wheat yields and shifting cultivation zones, affecting both availability and affordability.

All of us who eat food will be affected, but different groups in the food system will also experience aspects of climate change in distinct ways. Unless we advocate for deeper changes, existing inequalities and corporate power will shape food system responses. Each, therefore, has a stake in how the Act is implemented. Here is how, from a food perspective, engaging with the Act is important for various actors.

SMALLHOLDER FARMERS: Farmers have had to grapple with crop failure, poor soils, and low production leading to food insecurity. This has been propelled by shifts in seasons and the increase in the number and intensity of climate-related disasters. Vulnerability is deepened for those with insecure land rights. The Act potentially provides further opportunity to advocate for local and national interventions that enhance land rights and land reform, protect and transform production, and future-proof smallholder farmers' livelihoods.

FARM WORKERS: Rising heat and drought already disrupt farm workers, shortening workdays and threatening health. The Act can potentially be used to help ensure farm systems adapt in ways that protect not only production but also workers and wages.

TRADE UNIONS: Without sufficient adaptation, workers and the working class will face rising food prices and increasingly perilous working conditions. Trade unions have a vital role in ensuring that adaptation and mitigation plans (see Box 1 for definitions) protect workers, secure decent work, and uphold rights. Workers in the food system and their formations can lead the drive for a resilient and just food system.

WOMEN: Black working-class women shoulder much of the burden when there is no clean water, when household crops fail, or when food prices rise. They also carry the burden of securing alternative household energy sources when the electricity supply is curtailed or unaffordable. The Act could be used to ensure regulations and plans to account for these rising burdens and also to strengthen public support for care work as part of resilience in the food system.

CHILDREN AND YOUTH: Young people will face the consequences of the climate crisis and food and water insecurity into

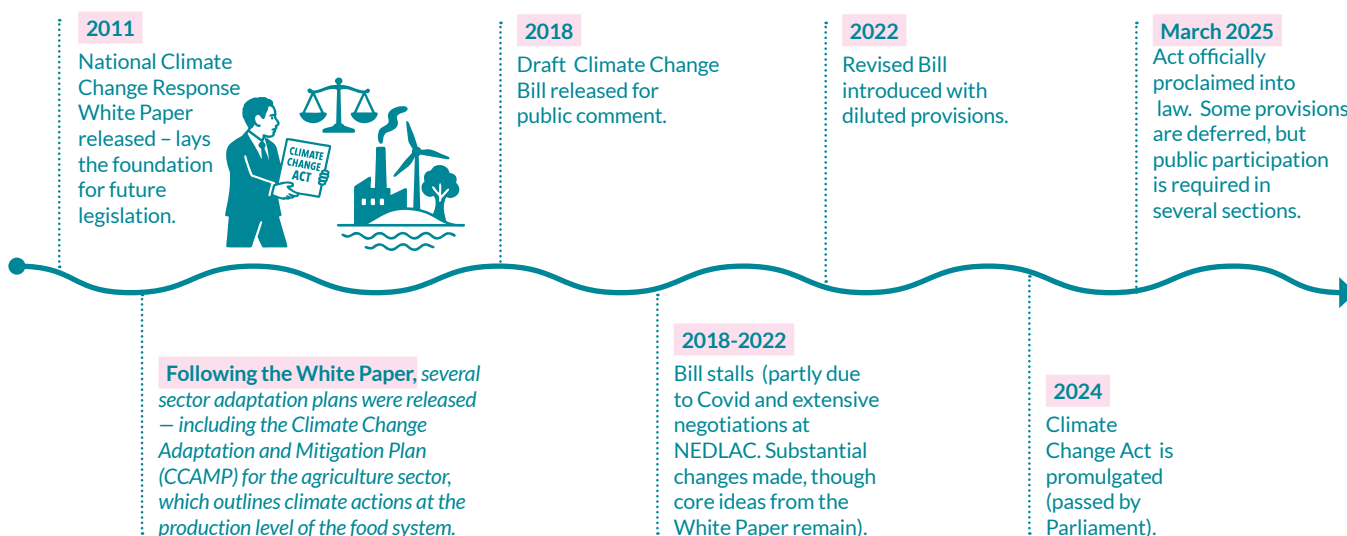


Illustration: Claire Roussel

the future, despite being the least responsible for driving it. With current high and escalating childhood stunting, unsafe water and sanitation and inadequate access to nutrition, climate change will worsen malnutrition. Difficult working and farming situations under climate impacts further threaten employment and livelihood opportunities for young people in the food system. Young people can use the opportunities the Act provides to advance their priorities for a climate-just future.

HOUSEHOLDS: Around 1 in 5 households in South Africa face hunger. Low-income households, those with insecure land ten-

Passing the Climate Change Act: a timeline



2011

National Climate Change Response White Paper released – lays the foundation for future legislation.



2018

Draft Climate Change Bill released for public comment.

2022

Revised Bill introduced with diluted provisions.

March 2025

Act officially proclaimed into law. Some provisions are deferred, but public participation is required in several sections.

Following the White Paper, several sector adaptation plans were released – including the Climate Change Adaptation and Mitigation Plan (CCAMP) for the agriculture sector, which outlines climate actions at the production level of the food system.

2018-2022

Bill stalls (partly due to Covid and extensive negotiations at NEDLAC. Substantial changes made, though core ideas from the White Paper remain).

2024

Climate Change Act is promulgated (passed by Parliament).

ure, farm workers, and small-scale producers are amongst the most vulnerable to climate impacts, which include rising food prices and potentially less predictable supply. The Act is an opportunity to further shape the system to ensure reliable, fair, and accessible food under climate change, rather than intensifying existing inequalities. This can be done by influencing the processes that the Act mandates by advocating and moulding future policy to adhere to a just transition.

CIVIL SOCIETY: The Act mandates public participation at several levels, offering civil society and the public a legal foothold to engage, monitor, and co-create policy that shapes a fairer and more sustainable food system.

Climate resilience requires transforming the food system, not only tweaking farming practices. Various stakeholders can work together to ensure that processes to implement the Act include agroecology, the securing of land rights and access, regulating the corporate food system, and recognising care work and decent livelihoods as central to adaptation and tackling the inequalities that undermine food security and sustainability.

What does the Climate Change Act NOT do?

- It does not provide specific ground-level obligations for climate action.
- It does not include binding emissions reduction targets or specify timelines for achieving them.
- It does not guarantee funding or budget allocations for implementation, which remains subject to other fiscal processes.
- It does not automatically protect vulnerable communities or ecosystems - this depends on how the Act is interpreted, applied, and translated into regulations and plans at national, provincial, and local levels. This creates an imperative for mobilising and advocating for embedding a true just transition agenda in upcoming plans and activities under the Act.
- It does not address loss and damage, which includes the impacts beyond those possible to adapt to.

What does the Climate Change Act do?

As a framework legislation, the Act provides the legal framework for action, and the specifics will be defined through regulations, national, provincial and municipal plans, sectoral guidelines, and ministerial decisions. It provides the framework for reducing South Africa's emissions and for adapting to climate change impacts. It is the development of these plans that provides civil society (including labour) and the public with an important opportunity to shape South Africa's climate response for the food system.

How to use the Act

- As a legal framework for advocacy and litigation to implement appropriate regulations and plans.
- To ensure food systems are central to climate policy in the development of regulations, vulnerability assessments, and plans, and that they reflect a just transition agenda centring procedural, distributive and restorative justice (see Box 1).
- As a legal framework to demand the timely development of relevant regulations and plans.
- Actively participate in the processes the Act establishes to shape regulations and plans through sustained engagement.
- To ensure public participation where it is mandated in the Act for certain processes, especially for grassroots food system actors and civil society.



BOX 1: DEFINITIONS

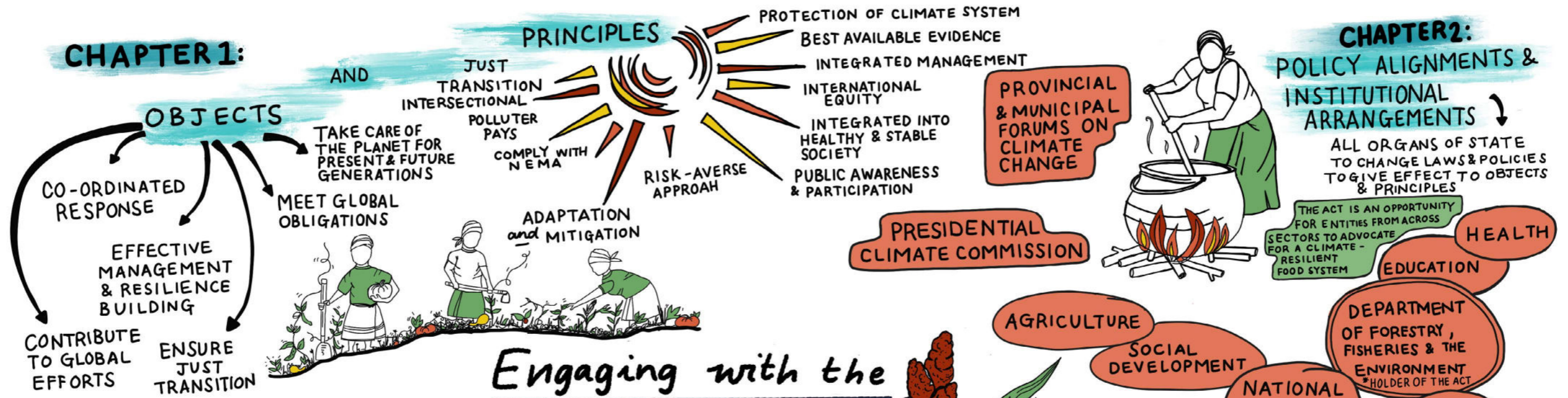
PROCEDURAL JUSTICE: Focuses on making decision-making processes fair, transparent, and inclusive, giving those affected a meaningful role in shaping outcomes.

DISTRIBUTIVE JUSTICE: Deals with how resources, opportunities, and responsibilities are allocated fairly, using principles such as equity, equality, and need.

RESTORATIVE JUSTICE: Involves repairing harm by bringing together those affected and those responsible to acknowledge impacts, take accountability, and agree on actions to make amends and prevent further harm.

ADAPTATION: Adjustment in natural, social or economic systems to experienced or expected climate impacts. This can happen through changes in processes, practices, and structures to moderate harm or benefit from opportunities. In short, adaptation refers to measures to adjust to climate change/minimise its impacts.

MITIGATION: Actions taken to reduce or prevent the emission of greenhouse gases into the atmosphere or to enhance carbon sinks that remove these gases.



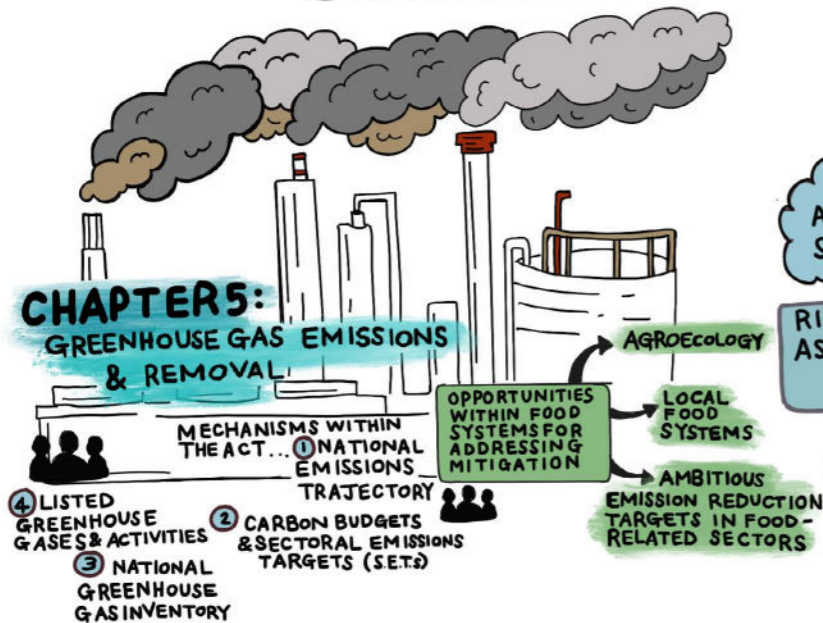
Engaging with the CLIMATE CHANGE ACT from a Food Systems Perspective



CHAPTER 6: GENERAL MATTERS

PUBLIC PARTICIPATION IS MANDATED IN CERTAIN PROCESSES THROUGHOUT THE ACT:

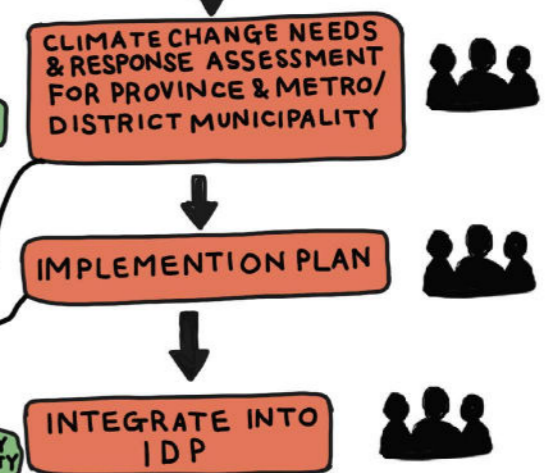
- ACCESSIBLE INFORMATION
- SUFFICIENT TIME FOR POLICY SUBMISSIONS
- SUBMISSIONS CAN BE WRITTEN OR ORAL



CHAPTER 4: NATIONAL ADAPTATION TO IMPACTS OF CLIMATE CHANGE



CHAPTER 3: CLIMATE CHANGE RESPONSE: PROVINCES & MUNICIPALITIES



Potential key priorities to advocate for in processes and plans under the Act

- Ensure that assessments and plans look at the whole food system (field to waste) rather than only focusing on agriculture (farming).
- Recognise food security as a climate issue by making it a core focus of local and national climate response plans.
- Shift public support toward agroecology and away from industrial, chemical-intensive farming.
- Mechanisms to regulate and keep food prices stable as part of climate resilience.
- Support small-scale producers through land access, public investment and support for agroecology, and climate-resilient infrastructure.
- Measures to address gender inequality by investing in services that reduce and redistribute the unpaid labour of women regarding food and nutrition as an important element of climate adaptation and a means to improve nutrition.
- Protect informal food traders through inclusive planning, infrastructure, and legal recognition by local governments.
- Decent work and fair wages for food system workers.
- Regulate corporate power in retail and supply chains and support fairer, more localised food economies.

Opportunities in the Climate Change Act to advance a resilient food system

This section briefly examines key parts of the Act and opportunities for intervening for a just and resilient food system. This can be read together with the illustrated summary on pages 4-5 that shows key provisions of the Act and possible food system dimensions.

POLICY ALIGNMENT ACROSS GOVERNMENT AND SECTORS

Chapter 2 of the Act requires that all state organs should harmonise their policies, programmes, laws and decisions with the principles and objects of the Act. This establishes a legal obligation that can be used to push for more ambitious, equitable, and climate-resilient policies across all sectors. This is not rhetorical alignment; it is a formal directive with legal weight. Civil society can use this obligation to challenge regressive policy, demand accountability, and promote systemic reform across all government departments.

FOOD SYSTEMS OPPORTUNITY: This creates an opportunity to integrate climate and food considerations into multiple national government departments. For example, the Department of Land Reform and Rural Development can be pushed to ensure land access and tenure security reflect climate risks and support adaptive, community-based food production. With food insecurity worsened by climate change, the National Treasury and the Department of Social Development can be engaged to align budgeting and social protection, such as school feeding and nutrition programmes. Other departments involved in trade, agriculture, and food security can also be held accountable for incorporating climate resilience into their policies and programmes. The Act enables stakeholders to advocate for coordinated, climate-responsive planning and implementation within and across government departments affecting the food system.

TAKE ACTION: Given your field (energy, food, water, land, etc.), advocate for integrating a just food transition angle into that sector's policies.

ADAPTATION AND CLIMATE RESPONSE PLANS

The Act lays out a framework for the National Adaptation Strategy and Plan (NASP), followed by sector-specific adaptation plans. It includes provisions for adaptation scenarios, objectives, and regular synthesis reports. The Act mandates the following timeline for the development of the NASP:

- One year after the Act passed into law:
 - » Scenarios for climate risks and adaptive responses must be developed
 - » The Minister must define national adaptation objectives and indicators
- Two years after the Act passed into law:
 - » Adopt the NASP (to be reassessed every 5 years)
- Within one year of the adoption of the NASP:
 - » Develop Sector Adaptation Plans (such as for agriculture, water, and so on)

These processes offer multiple opportunities for civil society to shape the national adaptation agenda to ensure it reflects a just transition. However, this timeline only comes into play once the process is officially commenced. The development of the NASP is one of the sections of the Act that is delayed, and so we need to advocate for it to begin.

FOOD SYSTEMS OPPORTUNITY: These processes provide an opportunity to ensure that food systems are included in the development of the scenarios and objectives for the NASP. It also provides an opportunity to ensure impacts on poor communities, workers, women, youth and small-

holder farmers are included in the scenarios. Furthermore, we should advocate to ensure that our solutions, such as agroecology, food price regulation and stabilisation, gender just interventions, local human-centred food systems, and formal and informal worker needs are included in the objectives and the content of the NASP. This requires reimagining adaptation not just as a technical adjustment, but as an opportunity to build socially just, decentralised, and ecologically-friendly food systems.

TAKE ACTION: Through participating in consultations, relevant submissions, and lobbying policy makers with your own policy positions, advocate for your sector's or constituency's needs and priorities to be reflected in the scenarios, objectives, and the NASP, as well as the sector adaptation plan for agriculture, which we should push to be for food systems as a whole.

LOCALISING CLIMATE ACTION

Chapter 3 of the Act mandates provinces and municipalities to develop and implement climate response plans and actions in line with the national framework. The Act states that municipalities must:

- Within at least one year of the publication of the NASP, conduct climate needs assessments.
- Within two years after that, they must develop climate response implementation plans or action plans - to be assessed every 5 years.
- Thereafter, they must integrate climate into their Integrated Development Plans (IDPs) (municipalities) and environmental plans (provinces).

FOOD SYSTEMS OPPORTUNITY: There are opportunities to ensure that provinces and municipalities incorporate considerations for sustainable local food systems in their climate needs assessments and response plans, and that the voices and needs of local food system actors are heard. As an example, the eThekweni Climate Action Plan highlights the need for food system interventions, including support for smallholders and small-scale local production through food gardens. However, such plans could go further by promoting agroecological practices, exploring interventions to make affordable food more available, and supporting small and informal food traders.

TAKE ACTION: First, grassroots organisations and civil society can hold municipalities accountable for initiating and completing these processes; second, they can advocate for the strengthening of local food systems to be incorporated in planning; and third, they can monitor implementation and ensure that plans are reviewed and updated as required.

COORDINATION AND PUBLIC PARTICIPATION

The Act mandates certain bodies to coordinate its implementation.

INTERGOVERNMENTAL COORDINATION OF CLIMATE ACTION

Chapter 2 designates the Premier's Intergovernmental Forum as the coordinating body for provincial climate policy. Each sitting of this forum automatically serves as the Provincial Climate Change Forum, meaning climate must be included on every agenda and aligned with other provincial policies. These forums also provide a mechanism for requesting technical support on climate-related issues. However, they currently lack civil society participation and operate with limited transparency.

FOOD SYSTEM OPPORTUNITY: The provincial forums provide a further platform for food systems to be included in coordination, which is important as provinces have mandates across different areas of the food system, such as agriculture, economic development, and environment.

TAKE ACTION: Target engagement with decision-makers who influence the forum's agenda, such as provincial department heads or municipal leaders.

ADVISORY BODY: PUBLIC AWARENESS AND PARTICIPATION

Chapter 2 mandates the Presidential Climate Commission (PCC) as an advisory body that can create an additional space that civil society can influence. The role is advisory, so its recommendations are not always translated into policy, but the PCC can be an important avenue of influence.

FOOD SYSTEMS OPPORTUNITY: The PCC's just transition work has included a focus on adaptation needs in agriculture. While this marks important progress, food systems as a whole are still only partially addressed in the PCC's Just Transition Framework. Civil society should use these entry points to strengthen the PCC's food system agenda, calling for the inclusion of food price regulation, decent work for farm labourers, and support for informal and local food economies.

TAKE ACTION: Work with allies to build a shared civil society agenda on food systems, participate in PCC consultations, engage with Commissioners of the PCC, and advocate for concrete technical improvements in the PCC's advisory body agenda.

MANDATED PUBLIC PARTICIPATION

Chapter 6 makes clear that throughout the Act, whether for municipal, provincial, national, or sector response plans, public

participation is mandated at multiple stages, including the provincial and municipal needs assessments, development of national adaptation objectives, scenarios and plans and the sector adaptation plans. It also requires that information be made accessible and that sufficient time be provided for written and, where appropriate, oral inputs.

FOOD SYSTEMS OPPORTUNITY: Democratic participation is a crucial part of food systems transformation. Ensuring required participation takes place is therefore key for voices from below to shape a more resilient and just food system in South Africa.

TAKE ACTION: Be aware of public participation processes, advocate for them to take place, and engage in them critically and constructively.

LIMITING EMISSIONS IN THE FOOD SYSTEM

The Act establishes a national emissions trajectory, sectoral targets, and carbon budgets to guide mitigation efforts. It also requires emissions tracking through a National Greenhouse Gas Inventory and allows regulation of synthetic gases. The Act mandates setting reduction targets. Civil society can use the UNFCCC's Nationally Determined Contribution (NDC) process to push for ambitious sectoral targets, ensuring they align with equitable climate and development priorities.

FOOD SYSTEMS OPPORTUNITY: Given significant emissions from the food system, it is essential to consider this sector and push for strategies that prioritise the needs of workers and communities while reducing emissions. A food systems approach can push for community ownership, smallholder farming and agroecology as key mitigation strategies that centre a just transition.

TAKE ACTION: Submit comments and participate in consultations on the Sectoral Emissions Targets to ensure that the government is planning a low-emissions food system and that the interventions are fair in terms of the costs and benefits.

ADVOCACY AND LOBBYING OPPORTUNITIES

Given the pace and severity of climate impacts, urgent action is needed. While the Act sets out clear policy processes and timelines, many, such as the municipal response plans required within three years (or two years after the adaptation plan), are lengthy compared to the urgency of the crisis. In theory, these timelines could allow space for thorough and holistic policy development. In practice, delays have already set in, and important processes like the development of the National Adaptation

Strategy and Plan have not yet been triggered. It is therefore important to apply pressure and support for these processes to move at the necessary pace.

FOOD SYSTEMS OPPORTUNITY: Climate impacts are already hitting food systems in Southern Africa. It is therefore important to ensure the urgent development and implementation of transformative adaptation plans for the food system.

TAKE ACTION: These delays present a potential need for advocacy and engagement with government officials to ensure the DFFE and other key departments are adequately supported to meet the timelines to implement the Act, especially concerning delivering timely, inclusive, and robust adaptation planning, which is critical for a resilient and just food system.

Conclusion

Given what the Climate Change Act mandates, there are multiple spaces for civil society to engage, from local climate forums to national plans and review processes. Staying aware of these opportunities, remaining connected to relevant networks, and advocating for ambitious, inclusive action will be essential to shaping the regulations and plans that follow to include a just and resilient food systems agenda. Developing a collective agenda among diverse voices, amplifying each other's demands, and agreeing on key priorities can strengthen coordinated advocacy, ensuring that the response to the climate crisis in the food system is just and effective.

For more information on engaging with government on the Climate Change Act, the Department of Forestry, Fisheries and Environment (DFFE) can be contacted at NCCSecretariat@dffe.gov.za. For more information and resources, please visit the IEJ website www.iej.org.za.

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