



Comments on the
**DRAFT NATIONAL GREENHOUSE GAS
CARBON BUDGET AND MITIGATION PLAN
REGULATIONS AND DRAFT TECHNICAL
GUIDELINES**





EXECUTIVE SUMMARY

AgriSA's submission on the Draft GHG Carbon Budget Regulations supports voluntary participation for agriculture, citing the sector's complexity, data challenges, and food security concerns. AgriSA is concerned that voluntary reporting may later become mandatory, which is not supported. It calls for simplified reporting, technical support, and recognition of agriculture's mitigation potential, including carbon sequestration. AgriSA urges alignment with national strategies, protection from unintended regulatory burdens, and continued stakeholder engagement through forums and inclusive policy reviews, advocating for a flexible, collaborative approach to climate action that ensures a just transition for farmers.





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1. INTRODUCTION

AgriSA appreciates the opportunity to comment on the Draft National Greenhouse Gas Carbon Budget and Mitigation Plan Regulations, as well as the associated Draft Technical Guidelines. As a national federation representing South Africa's agricultural sector, we are committed to supporting climate action that is both environmentally sound and socio-economically just. We commend the Department for its consultative approach and for recognising the voluntary nature of agricultural participation in the carbon budgeting framework.

2. VOLUNTARY PARTICIPATION OF AGRICULTURE

AgriSA strongly supports the provisions in Regulation 4(4) and Annexure 3A of the Draft Regulations, which affirm that agricultural activities fall under a voluntary reporting regime. This is echoed in the Technical Guidelines, which clarify that Scope 1 emissions from agriculture may be voluntarily elected and, once chosen, remain applicable across all three commitment periods.

We believe this approach is essential for the following reasons:

- **Biogenic Emissions Complexity:** Agricultural emissions such as methane and nitrous oxide are largely biogenic and difficult to mitigate without affecting food production.
- **Operational Diversity:** The sector includes a wide range of farm sizes and production systems, many of which lack the capacity for formal emissions reporting.
- **Food Security Imperatives:** Regulatory burdens must not compromise national food security or rural livelihoods.



AgriSA recommends that the voluntary nature of agricultural participation be preserved in future iterations of the regulations and guidelines. AgriSA also requests clarification on whether voluntarily reported Scope 1 emissions from road transportation are counted toward a data provider's Carbon Budget. If so, would exceeding this budget trigger penalties like higher carbon taxes, or are such penalties limited to mandatory Scope 1 reporting?

3. TECHNICAL FEASIBILITY AND SUPPORT MECHANISMS

The Draft Technical Guidelines outline rigorous data collection, monitoring, and verification requirements. While appropriate for industrial sectors, these pose challenges for agricultural producers:

- **Limited Access to Tools:** Many farmers lack emissions measurement instruments.
- **Methodological Uncertainty:** IPCC methodologies for agricultural emissions are still evolving and may not reflect local realities.
- **Cost Burden:** Independent verification and validation requirements may be prohibitively expensive for small and medium-sized farms.

AgriSA recommends:

1. Development of simplified, agriculture-specific reporting templates.
2. Provision of technical assistance and subsidised access to emissions measurement tools.
3. Exemption from mandatory verification for voluntary agricultural participants.



4. RECOGNITION OF AGRICULTURAL MITIGATION POTENTIAL

Although agriculture is not subject to mandatory carbon budgets, the sector offers substantial mitigation opportunities:

- **Carbon Sequestration:** Practices such as conservation tillage, cover cropping, and agroforestry enhance soil carbon storage.
- **Low-Emission Technologies:** Improved fertiliser management and rotational grazing can reduce emissions without compromising productivity.



We propose:

1. Establishment of a registry for voluntary agricultural mitigation actions.
2. Recognition of sequestration efforts in national inventories.
3. Incentives for climate-smart agriculture, including access to carbon markets and green finance.

5. ALIGNMENT WITH BROADER POLICY FRAMEWORKS

The Draft Regulations and Technical Guidelines must be harmonised with other national policies, including:

- **The Agriculture And Agro-Processing Master Plan**
- **The Climate Change Adaptation Strategy**
- **The National Biodiversity Framework**

AgriSA urges the Department to:

1. Coordinate closely with the Department of Agriculture.
2. Ensure that mitigation efforts complement food security and rural development goals.
3. Avoid indirect regulatory burdens through supply chain pressures.



6. STAKEHOLDER ENGAGEMENT AND ADAPTIVE IMPLEMENTATION

AgriSA commends the Department for its inclusive approach and encourages continued engagement with agricultural stakeholders. The phased implementation outlined in the Technical Guidelines provides a valuable opportunity for iterative learning and refinement

We recommend:

1. Establishment of an Agricultural Climate Forum to guide voluntary participation.
2. Inclusion of agricultural representatives in the review of Annexures and methodological updates.
3. Periodic assessments of sectoral readiness to inform future policy shifts.





7. CONCLUSION

AgriSA remains committed to supporting South Africa's climate objectives. We believe that agriculture can contribute meaningfully through voluntary participation, innovation, and stewardship. We respectfully request that the Department maintain the voluntary nature of obligations for agriculture, provide tailored support mechanisms, and foster inclusive dialogue in shaping a just and effective climate response.

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