

ISIMO (SEZULU) SASEKOMANI:

A Community-Centered Analysis of Climate Adaptation Policy in the Eastern Cape



Inside the report

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Direct Field Evidence from Komani

Documentation of how consecutive 2023 flooding events displaced over 1,000 residents, destroyed health infrastructure, and exposed systemic municipal service failures in the Eastern Cape.

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Gendered Climate-Health Analysis

Detailed examination of the disproportionate health risks borne by women, ranging from heat-induced maternal complications (pre-eclampsia, pre-term birth) to heightened surges in vector-borne diseases, mental health strain, and gender-based violence.

3

Legal & Policy Gap Assessment

Comprehensive audit contrasting South Africa's constitutional duties (Sections 9, 10, 24, 27) and international obligations against the complete absence of active, updated health-sector climate adaptation plans across national, provincial, and local levels.

4

Actionable Roadmap for Reform

A set of rights-based recommendations urging the immediate enforcement of the Climate Change Act 22 of 2024, completion of provincial risk assessments, implementation of gender-responsive budgeting, and meaningful inclusion of women in governance.



Isimo means the circumstance/situation. Weather is translated to isimo sezulu which directly translated means “the circumstance/situation of the sky”.

Isimo sasekomani would mean “the circumstance of Komani”. So “Isimo (sezulu) sasekomani” would be a play on the word Isimo to mean we are talking about the circumstance of the weather in Komani and the circumstance of Komani in general.

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EXECUTIVE SUMMARY

Climate change poses a grave threat to the health, wellbeing and livelihood of vulnerable communities everywhere. In South Africa, there are few more vulnerable than the communities in the Eastern Cape province.

The Eastern Cape is home to over 7 million people. Over 85% of the population of the Eastern Cape is black, with approximately 52% of the population being women.¹ The province is characterised by an unemployment rate of 44.6% (making it the highest in the country); it is home to the lowest percentage of individuals who completed secondary schooling at 27.2% (the lowest in the country);² and 64.9% of households rely on social assistance as the main source of income.³ These are only some of the factors that amplify the Eastern Cape's vulnerability to climate events.

It is generally recognised that the impacts of climate change fall disproportionately on women.⁴ When compared to the risks faced by men, women suffer higher risks of adverse impacts of climate change on their reproductive health and mental health. Extreme weather events also significantly increase women's risk

¹ Census 2022, Statistics South Africa. Available online at: <https://www.statssa.gov.za/?p=16760>. Accessed on 22 July 2026.

² Ibid

³ Statista: Distribution of individuals and households that received social grants in South Africa in 2023, by province. Available online at: <https://www.statista.com/statistics/1116081/share-of-population-receiving-social-grants-in-south-africa-by-province/>

>85%

Black population in the Eastern Cape

52%

Female population in the Eastern Cape

44.6%

Unemployment rate in Eastern Cape, highest in South Africa

64.9%

Households in Eastern Cape relying on social assistance as main income source

of contracting infectious diseases and increase the prevalence of gender-based violence. The intersection of climate change and socioeconomic disparities further intensifies the health risks for women in disadvantaged communities.⁵

Given the vulnerabilities of the Eastern Cape, marked by poverty indicators and the heightened risk of impacts on women’s access to healthcare, SECTION27 has become increasingly concerned about the ability of the province to adapt to and survive climate change events.

SECTION27 partnered with EHCAC and clinic committees in Komani in the Chris Hani Municipality of the Eastern Cape. Workshops were conducted to better understand the impact of climate change on women in the Eastern Cape and to develop a collective understanding of the extent of the legislative framework of gender-sensitive climate adaptation in the Eastern Cape and its practical implementation. The workshops also served to capacitate participants on gender-responsive budgeting, to help them understand where resources for climate adaptation can be located in the national, provincial, and municipal budgets. The result is this report, and a complementary report published by SECTION27 and titled “South Africa’s Health Budget 2025/2026: Gender and Climate Responsiveness.” The work with EHCAC and the clinic committees continues.

Having suffered two successive flooding events, one month apart in 2023, which led to the displacement of several communities and the destruction of health infrastructure, Komani is the quintessential example of the impact of climate change on women in the Eastern Cape.⁶ Women in Komani live in underserved communities facing service delivery challenges including lack of access to water, sanitation and electricity.⁷ The municipality has a high prevalence of women led households,⁸ and women face systematic barriers in the healthcare system that hinder access to quality healthcare, including staff shortages, medicine stockouts, lack of sanitation and ailing infrastructure. These intersecting vulnerabilities impact on the ability of women in Komani to adapt to and recover from climate change shocks. It is therefore paramount

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⁵ G Anjum & M Aziz, ‘Climate change and gendered vulnerability: A systematic review of women’s health’ (2025) Volume 21 Women’s Health 12.
⁶ Sithembile Sgqolana, ‘Floods displace more than 1,000 informal settlement residents in Komani’, Daily Maverick, 9 February 2023. Available at: <https://www.dailymaverick.co.za/article/2023-02-09-floods-displace-more-than-1000-informal-settlement-residents-in-komani/>. Accessed on 23 July 2026.
⁷ See also the Draft Climate Change Adaptation Action Plan for the Eastern Cape highlighting how the lack of access to basic services compounds the Eastern Cape’s vulnerability to climate change impacts.
⁸ Chris Hani District Municipality demographic information. Available at: <https://municipalities.co.za/demographic/104/chris-hani-district-municipality>. Accessed on: 23 July 2026.

that any framework that is developed to address climate change is gendered in its approach and is designed with the disproportionate impact of climate change on women in mind.

Climate change adaptation plans provide a strategic framework that outlines how governments and, in this instance, the Eastern Cape provincial government in particular, will prepare for and adjust to the inevitable impacts of climate change events. This report aims to assess the available climate change legal framework against what the empirical evidence demonstrates is required for an effective health sector climate change adaptation plan. The report further aims to assess whether, as currently formulated, the existing legal framework adequately responds to the adverse impacts of climate change on health, with a particular focus on whether the plans address the unique adaptation needs of women.

We conclude that South Africa is legally obligated to consider and address women's specific needs in climate-related policies and actions in terms of its international commitments under the United Nations Framework Convention on Climate Change, the Paris Agreement and the Sustainable Development Goals. South Africa's constitutional framework also requires the State to take adaptive measures to facilitate the protection and enjoyment of women's rights to access to health care services and a safe environment. However, analysis of climate-related legislation and policy demonstrates that the South African government has failed to put in place institutional arrangements to create an enabling environment for the adoption and implementation of gender responsive health adaptation plans. While the Climate Change Act was enacted in 2024, critical provisions in the Act aimed at creating adaptive capacity are yet to come into operation.

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The failure to adopt and implement health sector climate adaptation plans has left women in Komani to bear the brunt of cascading climate change health impacts...

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An analysis of existing climate change adaptation plans across various sectors reveals that there is currently no health sector climate adaptation plan at the national, provincial or local level. Health has only been included as a key sector in lapsed adaptation plans. The Eastern Cape provincial and municipal adaptation plans that are publicly available

have expired, and made no provision for gender responsive adaption. The failure to adopt and implement health sector climate adaptation plans has left the women in Komani to bear the brunt of cascading climate change health impacts with little to no assistance from available government structures.

Recommendations

Key recommendations in this report include:



the immediate operationalisation and enforcement of key adaptation provisions in the Climate Change Act;



the completion of a provincial climate change needs and response assessment;



the development and implementation of updated, gender-responsive climate adaptation plans and budgets;



investment in resilient health infrastructure and early warning systems;



strengthened climate-health surveillance and research; improved emergency preparedness; and



the meaningful inclusion of women and vulnerable communities in planning, implementation, and monitoring processes.

Embedding human rights principles of equality, participation, accountability, and non-discrimination throughout adaptation planning will be essential to building an equitable and climate-resilient health system capable of protecting the most vulnerable communities in the Eastern Cape.

01.

INTRODUCTION

INTRODUCTION

Healthcare access in South Africa remains deeply inequitable, shaped by structural, economic, policy, and socio-cultural barriers.⁹ Inequitable access to healthcare is acute in provinces such as the Eastern Cape with rural areas enduring the worst barriers to access to healthcare including lack of road infrastructure, lack of health care facilities, staff shortages and medicine stockouts.¹⁰ The impacts of climate change threaten to entrench these existing inequalities in the healthcare system if appropriate adaptation measures are not put in place.

Women stand to be impacted most by the deepening inequality as they experience disproportionate burdens of climate change. This is due, among others, to gender roles prevalent within societal and familial structures, limited access to resources, biological differences, and systemic inequalities.¹¹ The vulnerability of women is further compounded in marginalised contexts such as Komani where there is limited access to healthcare due to inequitable access, infrastructure deficits, and staffing shortages.¹² It is against this background that SECTION27 partnered with the Eastern Cape Health Crisis Action Coalition (EHCAC)¹³ and women sitting as members of clinic committees in Komani. The work conducted with EHCAC is based in Komani and aims to increase constructive engagement between government and civil society on gender-responsive climate adaptability and budgeting. Our work further aims to promote the integration of rural women's voices among civil society actors advocating for government to adopt constitutionally compliant climate change adaptation plans and budgets. This project was designed with the intention of developing an understanding of the climate adaptation legal framework and its application while empowering communities with the necessary information needed to locate budget resources for government-led climate adaptation initiatives.

⁹ M.M Willie, S Iyaloo, & S Masekela 'Persistent inequalities in health-care access in South Africa.' Council for Medical Schemes. <https://www.medicalschemes.co.za/persistent-inequalities-inhealthcare-access-in-south-africa/> 1.

¹⁰ M Mvukweni, 'Addressing Healthcare Access Inequalities in South Africa: Evaluating Legislative and Human Rights Obligations and Proposing Strategies for Improvement' (2024) E-Journal of Humanities, Arts and Social Sciences (EHASS) Volume 5 Issue 16 Available online at: <https://noyam.org/journals/ehass/> page 3372.

¹¹ P Vengesai, 'Tackling Climate Change Impacts from a Gendered Perspective in South Africa' (2025) E-Journal of Humanities, Arts and Social Sciences 1830.

¹² See n NOTEREF _Ref235264072 \h * MERGEFORMAT2 above.

¹³ EHCAC is a coalition of civil society organisation's and individuals advocating for better healthcare in the Eastern Cape. EHCAC was established in June 2013 and has since worked to address various health related issues in the province, including issues of health infrastructure, availability of medicine and supplies, human resources, sexual reproductive health services and emergency medical services.

Building on this work, this report analyses health sector climate change adaptation plans intended to address the impacts of climate change in the Eastern Cape. It assesses whether these plans adequately respond to the adverse health impacts experienced by the residents of Komani, with a particular focus on their gender responsiveness. The report also develops recommendations for incorporating gender responsiveness to strengthen health sector climate change adaptation plans.

The report is divided into four sections. Section two examines the aims of climate adaptation and why climate adaptation must be gender responsive. Section three locates South Africa's international and domestic obligations to adopt and implement gender responsive adaptation with an analysis of the relevant adaptation plans, including the risks adaptation gaps present for women in Komani. Finally, Section four concludes the report and provides recommendations.

Methodology

The report has been compiled through a combination of desktop research and community engagement, which included capacitation workshops and field research. We visited clinics, schools and homes of the affected residents of Komani to record and document evidence of climate change destruction. The community engagements were aimed at understanding the problems experienced by the residents in Komani and working together to develop a deeper understanding of climate change and to effectively engage with the tools needed for the residents to become empowered to manage its impacts.

02.

**UNDERSTANDING
GENDER-RESPONSIVE
CLIMATE ADAPTATION**

UNDERSTANDING GENDER-RESPONSIVE CLIMATE ADAPTATION?

The disproportionate impact of climate change on women underscores the need for adaptation policies to be gender responsive.

Mitigation and adaptation are two complementary strategies for addressing climate change.¹⁴ Whereas mitigation aims to reduce the drivers of climate change by cutting greenhouse gas emissions, adaptation aims to build resilience to the impacts that cannot be, or have not been, avoided.¹⁵ The goal of adaptation is primarily to reduce the adverse impacts of climate change and to take advantage of any opportunities that may arise.

In general, adaptation policies aim to increase the ability of humans and systems such as the healthcare system to adjust to long-term climate change and to recover as quickly as possible from individual adverse climate events.¹⁶

Adaptation planning is a key tool for countries, provinces, and other levels of government to plan, implement, and track progress on actions to build resilience to the impacts



Maternal & Neonatal Complications: Heat exposure causing pre-term births and pre-eclampsia



Infectious & Vector-Borne Diseases: Surges in malaria and cholera exposure



Mental Health Stressors: Climate displacement and socioeconomic strain



Gender-Based Violence Risks: Heightened risk during extreme weather infrastructure damage



Water & Sanitation Burden: Exposure to untreated water during domestic care roles

¹⁴ Intergovernmental Panel on Climate Change (IPCC). Climate Change 2014 Synthesis Report Summary for Policymakers. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change; 2014.

¹⁵ IPCC. Climate change 2007: impacts, adaptation and vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the IPCC; 2007.

¹⁶ Intergovernmental Panel on Climate Change, 'Climate Change: How to adapt to a changing climate, summary for all' (2022).

of climate change.¹⁷ Consequently, the adaptation planning process is also a key opportunity to integrate gender considerations to move toward gender-responsive adaptation to climate change.¹⁸ The impacts of climate change are not gender neutral and climate adaptation must be gender responsive to adequately build the capacity of women and girls to recover from its impacts. The following section explores the gendered impacts of climate change and provides justification for gender responsive adaptation

Women's health can be affected directly and indirectly by climate change impacts.¹⁹ Directly, women are more likely to die and be injured than men during climate related disasters such as flooding, and women who survive have a decreased life expectancy.²⁰ This is due to long-standing gender inequalities that have created disparities in information, mobility, decision-making and access to resources and training.²¹ Climate change also affects maternal and neonatal health.²² Heatwaves increase complications during pregnancy and childbirth. The impact of high temperatures in pregnant women has been linked to adverse pre-term birth, pre-eclampsia, stillbirth and prolonged labour.²³ Babies and infants are also vulnerable to the impacts of extreme weather. In particular, babies under 28 days from birth have an increased risk of death from exposure to high and low temperatures.²⁴

Climate change can also increase the spread of vector-borne diseases that women are particularly vulnerable to.²⁵ Mosquitoes are sensitive to climatic variations, and temperature rises can increase the prevalence of malaria.²⁶ Women and girls are at a higher risk of contact with highly infectious diseases through domestic work such as caring for sick family members, cleaning latrines, fetching and handling untreated

¹⁷ A Dazé, & C Hunter, "Advancing gender-responsive national adaptation plan (NAP) processes: State of play and promising examples" (NAP Global Network synthesis report). International Institute for Sustainable Development available at <https://napglobalnetwork.org> page 1. Accessed 12 July 2026.

¹⁸ Ibid.

¹⁹ M Chersich. "Climate change impacts on health, access to healthcare, and the right to enjoy an environment not harmful to one's health and well-being, with a focus on women and girls in SADC" (2026)

²⁰ UNDP, "Gender and disaster risk reduction" (2013), available at www.undp.org/content/dam/undp/library/gender/Gender%20and%20Environment/PB3-AP-Gender-and-disaster-riskreduction.pdf accessed 7 July 2026.

²¹ "How gender inequality and climate change are interconnected" (2025) available at [How gender inequality and climate change are interconnected | UN Women – Headquarters](#) accessed on 19 August 2026.

²² See note 2 above.

²³ See note 10 above. See also DP Lakhoo, N Brink, L Radebe, et al. "A systematic review and meta-analysis of heat exposure impacts on maternal, fetal and neonatal health" (2025) *Nat Med.* -8. See also M Chersich, F Scorgie, V Filippi, et al. "Increasing global temperatures threaten gains in maternal and newborn health in Africa: A review of impacts and an adaptation framework" (2023) *International Journal of Gynecology & Obstetrics* 14381.

²⁴ See note 10 above. See also B Nakstad, V Filippi, A Lusambili, et al. "How Climate Change May Threaten Progress in Neonatal Health in the African Region" (2022) *Neonatology*. 2022;119:644–51. doi: 10.1159/000525573.

²⁵ Public Health Institute, and Center for Climate Change and Health, "Special focus: climate change and pregnant women" (2016), available at <http://climatehealthconnect.org/wp-content/uploads/2016/09/PregnantWomen.pdf>. accessed 3 July 2026.

²⁶ See note 10 above.

water and preparing contaminated raw food.²⁷ The risk of disease outbreaks is higher where water and sanitation are compromised.²⁸

The effects of climate change can also affect women’s mental health. Women, especially black women, are more susceptible to adverse mental health outcomes due to socioeconomic stressors unique to black women and which are compounded by climate change, as well as displacement caused by climate-related events.²⁹

The gendered impacts of climate change also affect women indirectly, such as through the devastating effects on women’s livelihoods and quality of life.³⁰ Women’s vulnerability stems from socially constructed responsibilities and power imbalances that shape their daily lives. For example, women are often involved in securing food, water, and taking care of their households.³¹ These roles increase their exposure to climate-related health risks such as heat stress, waterborne diseases, and malnutrition.³² Climate change may also increase risks of sexual and gender-based violence, this is because climate change is intensifying the social and economic stresses that often result in increased levels of violence against women and girls.³³ Climate change impacts intersect with existing systems of power and inequality and may worsen the uneven power dynamics leading to increased gender-based violence.³⁴

Extreme weather events, which are increasing in frequency and intensity because of climate change, can destroy essential infrastructure and otherwise contribute to a decrease in the quality, availability and accessibility of sexual and reproductive health services.³⁵

The direct and indirect impacts of climate change must be viewed within the context of existing structural inequalities. The intersection of climate change with socioeconomic

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²⁷ See note 10 above. See also UNFPA Briefing note ‘integrating gender in cholera prevention and control interventions in northeast Nigeria’ (2017) available at [Briefing note: integrating gender in cholera prevention and control interventions in north east Nigeria - Nigeria | ReliefWeb](#) accessed on 7 July 2026. See also WHO “Southern Africa faces acute surge in cholera due to floods, displacement.’ (2026) available at <https://www.afro.who.int/news/southern-africa-faces-acute-surge-cholera-due-floods-displacement> accessed 1 July 2026.

²⁸ See note 6 above.

²⁹ See note 2 above 13.

³⁰ Report of the Office of the United Nations High Commissioner for Human Rights, “Analytical study on gender-responsive climate action for the full and effective enjoyment of the rights of women” (2019) available at <https://www.ohchr.org/en/documents/studies/ahrc4126-analytical-study-gender-responsive-climate-action-full-and-effective>. Accessed on 13 June 2026

³¹ Ibid.

³² See note 2 above.

³³ ‘Colliding Crises: How the climate crisis fuels gender-based violence’ (2025) available at [Colliding Crises: How the climate crisis fuels gender-based violence | Spotlight Initiative](#) accessed 19 August 2026.

³⁴ Ibid.

³⁵ Ibid.

disparities such as poverty, lower levels of education and access to healthcare, further intensifies the health risks for women in disadvantaged communities such as those in the Eastern Cape.³⁶

The exacerbated impacts of climate change on women can only be addressed by adaptation plans and policies that specifically take them into account.³⁷ Therefore, it is critical that Eastern Cape adaptation policies are gender responsive and adequately address the intersecting vulnerabilities faced by women and girls in the Eastern Cape.



³⁶ See note 2 above.

³⁷ United Nations Framework Convention on Climate Change, the Kyoto Protocol and the Paris Agreement, “Progress, good practices and lessons learned in prioritizing and incorporating gender-responsive adaptation action” (2023) available at [202310 adaptation_gender.pdf](#) 8. Accessed 12 July 2026.

03.

THE REGULATORY FRAMEWORK FOR CLIMATE ADAPTATION

THE REGULATORY FRAMEWORK FOR CLIMATE ADAPTATION

This section analyses the obligation on the Eastern Cape government to take adaptation measures, including gender responsive adaptation. It commences with an examination of South Africa's international commitments, which is followed by an analysis of key climate legislation to locate the enabling legal framework for gender responsive adaptation.

International and regional framework

South Africa's climate change adaptation obligations in the health sector under international law are shaped by international instruments on climate change, such as the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris Agreement, both of which emphasise the importance of state parties adopting climate change adaptation measures.

South Africa ratified the UNFCCC in 1997, committing itself to addressing the impacts of climate change. The Convention obliges state parties to develop and maintain national and regional programmes to facilitate adaptation

● **1997**

South Africa
ratifies UNFCCC

● **2014**

Adoption of Lima
Work Programme
on Gender
(Decision 18/CP20)

● **2016**

South Africa
ratifies Paris
Agreement

● **2018**

Adoption of
CEDAW General
Recommendation
No. 37

● **2023/2030**

UAE Framework
for Global Climate
Resilience target
for 2030 NAPs

to climate change, as outlined in Article 4(1)(b). This includes implementing comprehensive adaptation strategies, particularly in sectors such as health, to reduce the adverse effects of climate change.

The recognition of gender-responsive climate action by the UNFCCC is supported by the various decisions adopted by the Conference of the Parties (COP) to the UNFCCC. For instance, Decision 18/CP.20, adopted in Lima, Peru, established the Lima Work Programme on Gender, requiring states parties to the UNFCCC to advance gender-responsive climate policy.³⁸ The mandate for gender responsive climate adaptation was reinforced by the United Arab Emirates Framework for Global Climate Resilience (UAE FGCR), agreed at the 28th Conference of the Parties (COP 28) to the UNFCCC, which establishes a target for countries to have gender-responsive and participatory National Adaptation Plan (NAP) processes that cover vulnerable communities by 2030.³⁹

Under the Paris Agreement, ratified by South Africa in 2016, adaptation remains a central goal, aimed at enhancing resilience and reducing vulnerability to climate impacts. The Paris Agreement obliges countries to consider their obligations on the right to health, gender equality and the empowerment of women when taking action to address climate change.⁴⁰ Under the Paris Agreement, South Africa is obligated to formulate and implement gender responsive adaptation plans taking into consideration vulnerable groups.⁴¹

Climate adaptation is also embedded in the United Nations Sustainable Development Goals (SDGs), specifically Goal 13, which calls for urgent action to combat climate change and its effects. This goal sets 2030 targets to strengthen resilience and adaptive capacity to climate hazards, integrate climate measures into national policies, and improve education, awareness, and institutional capabilities.

Together, the UNFCCC, the Paris Agreement, and the SDGs create a cohesive framework that requires South Africa to implement inclusive, sustainable, and proactive adaptation strategies to safeguard human and environmental health from the impacts of climate change.

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³⁸ UNFCCC, Decision 18/CP.20: Lima Work Programme on Gender (Conference of the Parties, 20th Session, Lima, 2014) UN Doc FCCC/CP/2014/10/Add.3. Preamble.

³⁹ See note 29 above.

⁴⁰ Paris Agreement to the United Nations Framework Convention on Climate Change, Dec. 12, 2015, T.I.A.S. No. 16-1104 (United Nations Treaty Series, Preamble).

⁴¹ Paris agreement Article 7(5) and 7(9).

The Convention on the Elimination of All Forms of Discrimination against Women protects the rights of women and prohibits all forms of discrimination against them. In its General Recommendation No. 37 (2018) on the gender-related dimensions of disaster risk reduction in the context of climate change, the Committee on the Elimination of All Forms of Discrimination against Women highlights the importance of gender-responsive climate action.

South Africa's legal and policy framework

Constitutional Framework

As discussed above, the impacts of climate change are intersectional and compound existing inequalities. Therefore, the impact of climate change on women engages multiple rights enshrined in the Constitution including the right to substantive equality, dignity, the right to a safe environment and the right to access to healthcare. To protect these rights, the Constitution obliges the state to take legislative and other measures, including gender responsive adaptation.

Disaster Management Act

The Disaster Management Act 57 of 2002 establishes a framework for integrated and coordinated disaster management, emphasising the prevention and reduction of disaster risks, the mitigation of disaster impacts, emergency preparedness, and prompt and effective post-disaster recovery efforts.⁴² Section 1 of the Disaster Management Act broadly defines disaster to include events related to climate change, thus integrating climate change considerations into disaster management practices.⁴³ This legislation is described as central to ensuring climate change adaptation.⁴⁴ The Disaster Management Act assigns responsibility to national, provincial and local spheres of government to invest in disaster risk reduction and climate change adaptation interventions for their respective jurisdictions. Each organ of state is required to develop disaster management plans that include climate change risks and responses.⁴⁵

⁴² See above note 6 at page 1830.

⁴³ Ibid.

⁴⁴ The National Climate Change Adaptation Strategy available at [nationalclimatechange_adaptationstrategy_ue10november2019.pdf](#) page 14. Accessed 05 March 2026.

⁴⁵ Ibid.

Under the Disaster Management Act, national and provincial organs of State, provincial governments and municipalities are required to conduct a disaster risk assessment for their functional area, identify and map risks, areas, ecosystems, communities and households that are exposed or vulnerable to physical and human-induced threats and prepare disaster management plans. The disaster management plan must set out the expected climate change impacts and risks and specific measures to be taken to address the needs of women, children, the elderly and persons with disabilities during the disaster management process. The disaster management plan must also provide measures and indicate investment in disaster risk reduction and climate change adaptation, including ecosystem and community-based adaptation approaches.

The implementation of the Disaster Management Act in addressing climate change impacts has taken a reactive approach. The implementation of the Act has disproportionately focused on short-term reactions to adverse climate events, rather than on strategies designed to reduce vulnerability to future events. This is particularly evident in Komani, where the government has responded in the aftermath of disasters instead of implementing adaptation measures.

Climate Change Act 22 of 2024

The Climate Change Act was promulgated to give effect to the right to an environment that is not harmful to health or wellbeing, and to enable the development of an effective climate change response. The Climate Change Act in its preamble acknowledges the effects of climate change on access to health, access to food and water, biodiversity, infrastructure, human settlements and infrastructure destruction.

The Climate Change Act recognises that South Africa is especially vulnerable to climate change impacts which require urgent and appropriate adaptation responses, and has made international commitments and obligations, including to communicate and implement an effective nationally determined climate change response, encompassing mitigation and adaptation actions.⁴⁶

The principles of the Act include the need for decision-making to consider the special needs and circumstances of localities and people that are particularly vulnerable to the adverse effects of climate change, including vulnerable workers and groups such as women (especially poor and rural women), children (especially infants and child headed

⁴⁶ The Climate Change Act 22 of 2024, Preamble.

families), the aged, the poor, the sick and persons with disabilities.⁴⁷

Under the Climate Change Act, an MEC and a mayor of a metropolitan or district municipality must within one year of the publication of the National Adaptation Strategy and Plan, undertake a climate change needs and response assessment for the province, metropolitan or district municipality.⁴⁸ The MEC must within two years of undertaking the climate change needs and response assessment develop, implement and publish in the Government Gazette a climate change response implementation plan as a component of, and in conjunction with, provincial, metropolitan or district municipal planning instruments, policies and programmes.⁴⁹

The climate change needs and response assessment must:

-  (a) identify climate change response considerations and options;
-  (b) analyse the nature and characteristics of the province or metropolitan or district municipality, as the case may be, and the particular and unique climate change needs and risks that arise as a result of such nature and characteristics;
-  (c) identify and spatially map, within the sphere of operations of the province, district or metropolitan municipality, as the case may be, risks, vulnerabilities, areas, ecosystems and communities that will arise, or that are vulnerable to the impacts of climate change;
-  (d) be based on the best available science, evidence and information; and
-  (e) identify and determine measures and mechanisms to manage and implement the required climate change response.⁵⁰

The Climate Change Act also requires the adoption of adaptation strategies that account for existing vulnerabilities. These strategies must focus on reducing identified vulnerabilities by building adaptive capacity and resilience within communities. Although it incorporates gender-specific perspectives on the impacts of climate change, the Climate Change Act fails to provide comprehensive protections for women against

⁴⁷ Climate Change Act, section 3(f).
⁴⁸ Climate Change Act, section 17.
⁴⁹ Ibid.
⁵⁰ Ibid.

these effects.⁵¹ Furthermore, the Climate Change Act awaits presidential pronouncement on its enforcement, consequently, the vulnerable groups identified in the Act, including women and children, are yet to benefit from its protections.⁵²



⁵¹ See above note NOTEREF_Ref235266478 \h * MERGEFORMAT6.

⁵² Ibid.

04.

ADAPTATION

POLICIES

ADAPTATION POLICIES

National

National Climate Change Response Policy 2011

The National Climate Change Response Policy (“NCCRP”) was developed as the White Paper presenting the “government’s vision for an effective response and just transition to a climate resilient and low carbon economy and society”.⁵³ The priority adaptation-related sectors for South Africa identified in the NCCRP, are water, agriculture and commercial forestry, health, biodiversity and ecosystems, human settlements (urban, rural and coastal). The NCCRP was to be reviewed every five years from the date of its publication in 2011.

The NCCRP outlines three types of climate change responses: climate change adaptation, climate change mitigation and climate change resilient development. The NCCRP aimed for the development of adaptation strategies that will be integrated into sectoral plans, including the Department of Health’s Strategic Plan. Under health, the NCCRP recognised that women, as primary care-givers, are put under additional strain looking after sick and elderly household members whilst maintaining a household. This leaves them less time to earn a livelihood putting cyclical pressure on them as they often neglect their own health in prioritising the health of others.

The NCCRP envisioned the integration of climate considerations in health sector plans to:



a. Reduce the incidence of respiratory diseases and improve air quality through reducing ambient particulate matter, ozone, and sulphur dioxide concentrations by legislative and other measures to ensure full compliance with National Ambient Air Quality Standards by 2020.



b. Ensure that food security and sound nutritional policies form part of an integrated approach to health adaptation strategies.

⁵³ See above note 38 page 5.

-  c. Develop and roll-out public awareness campaigns on the health risks of high temperatures and appropriate responses including improved ventilation and promotion of behaviours that minimise exposure to high temperatures, namely “avoidance behaviour.”
-  d. Design and implement “Heat-Health” action plans including plans in respect of emergency medical services, improved climate-sensitive disease surveillance and control, safe water and improved sanitation.
Strengthen information and knowledge of linkages between disease and climate change through research.
-  e. Develop a health data-capturing system that records data both at spatial and temporal scales and that ensures that information collected can be imported into multiple-risk systems such as the South African Risk and Vulnerability Atlas (SARVA).
-  f. Improve the bio-safety of the current malaria control strategy. Although the current strategy, which includes the use of the persistent organic pollutant, dichloro-diphenyltrichloroethane (DDT), has proven effective in reducing the incidence of malaria, there are significant concerns about its long-term impacts on environmental and human health.
-  g. Strengthen the awareness programme on malaria and cholera outbreaks.

Despite the express acknowledgment of the gendered impacts of climate change in the policy, there are no provisions or considerations for gender responsive adaptation. A key observation is that this policy envisioned the adoption of health sector adaptation plans that would detail interventions aimed at climate adaptation, however, there has been only one policy adopted by the National Department of Health - in 2014. The 2014 National Climate Change and Health Adaptation Plan analysed below does not expand on the climate considerations listed above nor does it entail interventions for climate related impacts.

National Climate Change Adaptation Strategy

The National Climate Change Adaptation Strategy (“NCCAS”) published in 2020 serves as South Africa’s National Adaptation Plan, fulfilling the country’s international obligations as outlined in the UNFCCC.⁵⁴ The NCCAS is a ten-year plan that must be reviewed

⁵⁴ See above note 38 page 10.

every five years. However, there has been no updated NCCAS to date, despite a review being due in 2025.

The NCCAS acknowledges that women in South Africa are vulnerable to climate change impacts. The guiding principles for implementation of the NCCAS include the promotion of the participation of vulnerable groups and building resilience and adaptive capacity of the most vulnerable people such as women, and especially poor and/or rural women.⁵⁵ The development and implementation of the NCCAS also aims to promote the participation of women, take gender differences in vulnerability to climate change into account, address the needs and priorities of both women and men, and not exacerbate gender inequalities.⁵⁶

The NCCAS identifies key actions including the drafting and publishing of adaptation plans by key sectors identified in the NCCAS including health, provincial departments and municipalities. The adaptation plans must be reviewed every five years. The NCCAS is a national strategy: it does not detail how adaptation will take place in the many sectors impacted by climate change.

National Climate Change and Health Adaptation Plan 2014-2019

The National Climate Change and Health Adaptation Plan (“NCCHAP”) aimed to provide a broad framework for health sector action toward adaptation to climate change. The NCCHAP identified health environmental risks including heat stress, natural disasters, housing and settlements, communicable diseases, food insecurity, hunger and malnutrition, and mental illness.

The NCCHAP proposed the establishment of a National Climate Change and Health Adaptation Steering Committee. This committee was to serve for a period of five years from 2014 to 2019. A key function of the Steering Committee was to ensure and guide the Department of Health on how to conduct a national climate change and health vulnerability assessment.

Other key action items identified in the NCCHAP include:

01 The Department of Health designing and implementing a long-term and

⁵⁵ See above note 38 page 22.

⁵⁶ Ibid.

comprehensive communications strategy to raise public awareness of climate change impacts and the advantages of early attention to adaptation.

- 02 The strengthening of public health monitoring and surveillance systems.
- 03 A national vulnerability assessment to identify high-risk locations and groups.
- 04 The development and implementation of environmental health impact assessments.
- 05 The establishment of a series of model projects, in which a range of climate change adaptation actions would be implemented, with a particular focus on prevention and intersectoral action.

Provincial

Eastern Cape Climate Change Response Strategy 2011

The Eastern Cape Climate Change Response Strategy (EECCRS) recognises the importance of initiating policy responses to facilitate planned and coordinated approaches to both climate change mitigation and adaptation. The EECCRS identified six priority areas for cross-sectoral programmes to address, including the management of the effects of increased temperatures on human lives and food security.

The report identified the following possible response strategies to climate change impacts on human health:



Reduction in co-stressors among urban and rural poor to improve resilience (for example improved nutrition, water and sanitation, wellness).



Education for shack fire prevention.



Promotion of safe fuels and cooking/lighting facilities in informal settlements (the use of paraffin, candles and open fires in informal settlements for energy needs is a primary cause of runaway shack fires).



Increased readiness of emergency and health services during heat waves.



Dedicated heat-stress response equipment in community clinics.



Installation of fire hydrants in informal settlements.

Strategies aimed at mitigation mentioned in the report include the development of a heat-wave management and response plan and a vector borne-disease and infection prevention and management plan, and the introduction of a waterborne and vector-borne disease monitoring programme. The EECCRS contained no timelines for the planned strategies. The EECCRS neither recognises nor addresses the gendered impacts of climate change.

Draft Climate Change Adaptation Action Plan for the Eastern Cape Province 2017

In 2017, the Department of Environmental Affairs (DEA) identified the need for strategic alignment and a shared vision for climate change adaptation between all nine provinces, and the need to review the Provincial Climate Change Response Strategies and the Development of Action Plans. The document available online is a report of the planning meeting for conceptualising the Draft Climate Change Adaptation Action Plan for the Eastern Cape Province.

The Report identified nine critical sectors for adaptation in the Eastern Cape, including human health, water resources and food security. It further identified, as key aspects for strengthening adaptive capacity, improved communication and information flow from provincial to municipal level and the allocation of budgets and skilled staff for mainstreaming adaptation. As well as focus on building understanding and awareness of climate change across sectors and the strengthening of coordination of activities across sectors to avoid duplication. The report details outcomes of a workshop as part of a consultative process undertaken by the Eastern Cape Department of Health to produce a Climate Change Adaptation Action Plan. Notably, the report does not recognize the gendered impacts of climate change or the required adaptation strategies to address this issue.

Municipal

Chris Hani Municipal Climate Change Vulnerability Assessment and Response Plan

In 2018, the Chris Hani District Municipality published its Municipal Climate Change Vulnerability Assessment and Response Plan (Response Plan). The Response Plan sets out key vulnerability indicators and the programmes that the Municipality intends to implement to create resilience in the municipality.

The Plan identified key climate change vulnerability indicators for the Chris Hani District Municipality, including human health. According to the plan, projected temperature increases due to climate change negatively affect the young and elderly population of the district. It further recognised that people working in the informal sector usually work outdoors and are therefore exposed to all weather elements and are particularly vulnerable to temperature increases.

An identified response to this issue was the incorporation of climate change related health and heat stress risks into the municipal Integrated Development Plan (IDP).

Chris Hani District Municipality IDP

The IDP for the municipality recognises the need to urgently adapt and mitigate the impact of climate change. However, it does not go beyond the recognition of the need for urgent adaptation and makes mention of the Climate Change Bill process and the District Climate Change Strategy as the key documents that address climate change adaptation.

Discussion: the shortcomings in climate adaptation planning for health in Komani

The South African government has a transformative role in terms of the Constitution. It is obligated to deliver services that restore dignity and

equality for the many people who have been impacted by exclusion and inequality in terms of the Constitution. This role must be carried out in the context of climate change adaptation. South Africa is required to apply a transformational adaptation approach, where the aim is to reduce vulnerability by fundamentally transforming key systems such as healthcare.⁵⁷ Notwithstanding this obligation, South Africa's climate framework has largely been dependent on non-binding policy. The national climate policies and the Eastern Cape adaptation plans have expired and are fragmented, outdated, and lack coherence. For instance, the Eastern Cape Climate Change Response Strategy was published in 2011. Almost 15 years later, the policy has not been updated to align with current legal frameworks and updated available science and research on climate change. Similarly, the municipal plans aimed at addressing climate change are outdated.

Notably, there has been no health sector specific adaptation plan at the national or provincial level to date, despite recognition of the need for such plans in the 2011 National Climate Change Response Policy. Health has only been included as a subcategory in the outdated provincial and municipal adaptation plans. Notwithstanding the identification of health as a key sector vulnerable to climate change impacts, the outdated provincial and municipal adaptation plans assessed fail to comprehensively examine and address the intersection of health, gender and climate change. Furthermore, the outdated provincial and municipal plans have an unbalanced focus on economic development and fail to prioritise building adaptive capacity for human health and healthcare systems. While recognizing the need for the Eastern Cape to maximise economic opportunities, it is important to highlight that sustainable development must be prioritised in conjunction with the health needs of the population. The expired provincial and municipal adaptation plans assessed also fail to address the present climate risks women and girls are exposed to in the Eastern Cape due to high levels of inequality and poverty. Eastern Cape faces significant challenges with multi-dimensional poverty and

⁵⁷ T Ledger 'Climate Adaptation, justice, and equity: conceptualising a 'Just Adaptation' in South Africa' (2026) available at [*20260713_JustAdaptation_Report_TracyLedger-.pdf](#) accessed 18 August 2026.

access to healthcare generally. Communities in the Eastern Cape, including Komani, also face challenges with access to water and sanitation. As mentioned earlier, such challenges increase the risks of infectious disease for women and girls. These challenges must be accounted for and addressed in health sector plans. There can be no effective gender responsive adaptation planning without a proper examination and analysis of the compounded health impacts of climate change on women and girls.

In order to develop effective gender responsive health adaptation plans, it is important for the Eastern Cape government to identify the existing vulnerabilities (such as gender, poverty, the burden of disease and access to services), and how they interact with each other.⁵⁸ Successful adaptation requires reducing existing vulnerabilities and limiting the negative impact of future adverse climate events.⁵⁹ This can be achieved through climate change needs and response assessments required by the Climate Change Act. The delay in operationalisation of the Climate Change Act is a key barrier to adaptation planning. It hinders enforcement and accountability mechanisms for those impacted by the Eastern Cape Department of Health's failure to adopt gender responsive health sector adaptation plans.

Important feedback from the community in Komani was the lack of accessible information about climate change and its impacts. This is a gap that requires urgent attention as communities need to be made aware of the risks of climate change and acquire knowledge about the options that are available for a response in order to be empowered to take their own action.⁶⁰ Access to information is one of the cornerstones of South Africa's democracy and must be applied in the context of climate change to advance policy development and the protection of rights.

⁵⁸ Id.

⁵⁹ Id.

⁶⁰ F.S Khatibi, A Dedekorkut-Howes, M Howes, E et al 'Can public awareness, knowledge and engagement improve climate change adaptation policies?' (2021) *Discov Sustain* 2, Vol18. At page 1.

05.

CONCLUSION AND RECOMMENDATIONS

CONCLUSION AND RECOMMENDATIONS

Communities that are vulnerable to the impacts of climate change, such as those in Komani, need to adapt to increase their resilience. Effective government policies and plans are a key component of this transition.⁶¹ The disproportionate impact of climate change on women and girls' health places a heightened duty on the State to ensure adequate access to healthcare and to take targeted measures to ensure that adaptation strategies address the specific vulnerabilities faced by women. Building the capacity for women to adjust and adapt to climate change impacts requires the adoption of adaptation policies that examine and address gender norms, roles and inequalities.⁶² The absence of health sector specific adaptation plans risks deepening the already entrenched inequality that exists broadly in South Africa. This research demonstrates that government is failing at national, provincial and local levels of government to fulfil its international and constitutional duty to create and adopt gender responsive adaptative plans and adaptative action. The impact of this failure is exacerbated for women and girls in the Eastern Cape who already experience multidimensional vulnerability to climate change due to gender, widespread lack of access to safe water and high levels of food poverty. Gender responsive adaptation planning must be implemented urgently.

In light of the findings in this report, the following recommendations are made.

- 01 The provisions of the Climate Change Act aimed at addressing climate change impacts must be operationalised immediately.
- 02 In line with the Climate Change Act, the Eastern Cape government must complete provincial climate change needs and response assessments in order to assess the impacts of climate change on women in the Eastern Cape.

⁶¹ F.S Khatibi, A Dedekorkut-Howes, M Howes, E et al 'Can public awareness, knowledge and engagement improve climate change adaptation policies?' (2021) Discov Sustain 2, Vol18. At page 1.

⁶² See note 26 above.

03

A gender responsive health specific adaptation plan informed by impact assessments must be adopted and implemented by all levels of government and specifically the Department of Health. The development and implementation of the updated, gender-responsive climate adaptation plan must be grounded in human rights-based principles including:



a. Equality and non-discrimination, with priority being accorded to the most marginalised groups of women and girls facing intersectional vulnerabilities, such as women and girls with disabilities, adolescents, older women, unmarried women, women heads of household, widows, women and girls living in poverty in both rural and urban settings; Participation and empowerment, through the adoption of effective processes and the allocation of the resources necessary to ensure that diverse groups of women have opportunities to participate in every stage of policy development, implementation and monitoring at each level of government, at the local, provincial and national levels;



b. Accountability and access to justice, which require the provision of appropriate and accurate information and mechanisms in order to ensure that all women and girls whose rights have been directly and indirectly affected by disasters and climate change are provided with adequate and timely remedies.⁶³

04

..... Women must be consulted with and participate at all states of adaptation planning, implementation and monitoring.

05

..... The Department of health at national and provincial level must develop and roll-out public awareness campaigns on the health impacts of climate change.

06

..... The Eastern Cape Department of Health must invest in resilient health infrastructure and early warning systems.

07

..... The National and Provincial Departments of Health must strengthen climate-health surveillance and research to improve emergency preparedness.

⁶³ Report of the Office of the United Nations High Commissioner for Human Rights, “Analytical study on gender-responsive climate action for the full and effective enjoyment of the rights of women” (2019) available at <https://www.ohchr.org/en/documents/studies/ahrc4126-analytical-study-gender-responsive-climate-action-full-and-effective> . Accessed on 13 June 2026



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