Nationally Determined Contributions in Africa

A FIVE-COUNTRY ANALYSIS



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Executive Summary



This assessment provides a five-country comparative analysis of the latest Nationally Determined Contributions (NDCs) submitted by five African nations: 1) Cameroon's 3rd NDC (October, 2025); 2) South Africa's 2nd NDC (October, 2025); 3) Togo's 3rd NDC (May, 2026); 4) Uganda's updated NDC (September, 2022), and 5) Nigeria's 3rd NDC (September, 2025). As developing economies that are historically responsible for less than three percent of global greenhouse gas emissions, these nations face profound, systemic threats from anthropogenic climate change, bearing a disproportionate ecological and economic burden that leaves them highly vulnerable to severe, localised climate shocks.

The analysis exposes a troubling trend in African climate governance: despite public-facing climate rhetoric promising green transitions, the underlying national frameworks are systematically engineered to rely on speculative, market-based mechanisms under Article 6 of the Paris Agreement rather than achieving structural, source-level emissions cuts. This design financializes nature by turning emission reduction requirements into a speculative investment field for private entities, transnational carbon brokers, and international consultants, ultimately sacrificing the sovereignty of local communities and genuine atmospheric relief.

A deeper evaluation reveals severe structural contradictions and informational gaps across these evaluated NDCs. Instead of outlining clear operational plans to phase out fossil fuels, multiple countries are actively using the banner of international climate compliance to shield parallel domestic fossil fuel infrastructure expansions, such as Nigeria's integration of natural gas into its renewable energy mix and Cameroon's overt intentions to intensify oil and gas prospecting.

Furthermore, the heavy emphasis on land-based carbon sinks, forest accounting fallacies, and net-zero targets serves as an accounting loophole that allows permanent geological emissions to be theoretically balanced out by highly volatile biological storage. This shift of the mitigation burden onto the land sector has already begun driving a dangerous wave of "green grabbing," resulting in the violent expropriation of communally held lands for commercial timber plantations, severe local displacement, and the collapse of traditional agroecological food networks, as seen in commercial logging projects in Uganda.

Compounding these structural flaws is a profound climate finance trap that deepens the financial reliance of African States on external capital. Implementing these NDCs depends heavily on shifting international funding with conditional requirements. Rather than receiving debt-free, liability-based reparations from historical high-emitting nations in the Global North, historical data show that most of the climate finance arrives as high-interest concessional loans, further trapping climate-vulnerable states in devastating cycles of debt distress.

To safeguard regional climate sovereignty, the report urgently calls on African governments to develop and advance genuine, self-determined climate commitments. It demands that delegates, civil society organisations, and negotiators categorically reject market-based false solutions while establishing a binding reparative framework that makes big polluters pay for historical damages. Furthermore, the report insists on kicking big polluters out of national policymaking and institutionalising community-led decision-making with grassroots veto power to protect local populations from predatory green schemes.

The African Continent: The Least Responsible with the Most at Stake



The core climate justice paradox is a stark macroeconomic reality: the African continent is historically responsible for less than 3% of global greenhouse gas emissions, yet under current warming trajectories, it faces severe, localised climate-induced shocks decoupled from its energy profile.

According to empirical findings in the IPCC Chapter 9: Africa Report, the region shoulders a highly disproportionate ecological burden. This vulnerability is worsened by a profound "readiness deficit" driven by high sovereign debt burdens that limit domestic investments in public infrastructure, early warning networks, or climate-resilient water systems. This is evidenced by the Vulnerability Index (2024) from the Notre Dame Global Adaptation Initiative (ND-GAIN), where, out of 190 countries, Cameroon ranks at #120, Nigeria #131, South Africa #87, Togo #144 and Uganda #159.

These climate hazards directly threaten regional food security. For example, peer-reviewed climate modelling in Ortiz-Bobea et al. (2021) demonstrates that anthropogenic warming has already caused an estimated 34% reduction in agricultural productivity growth across Sub-Saharan Africa since 1961, while compounding hazards and severe public health risks continue to accelerate across diverse ecological zones, as documented in the WMO State of the Climate in Africa Report. Amid these overlapping crises, and instead of receiving genuine, liability-based climate reparations from the Global North, Africa continues to swallow the bait of neocolonialist schemes and mechanisms such as ISDS, fossil fuel debt traps, and unregulated carbon markets. As it stands, these NDCs are currently engineered to rely heavily on international market-based mechanisms under Article 6 of the Paris Agreement to fulfil national targets. Furthermore, rather than outlining plans to phase out fossil fuels, several NDCs actively accommodate the expansion of natural gas infrastructure and domestic oil prospecting under the protective banner of international climate compliance.

Research by Carbon Market Watch warns that market-based mechanisms such as carbon markets pose severe risks to environmental integrity and long-term emission lock-in, while also exacerbating global inequities. Furthermore, investigative reporting on corporate environmental governance limits published via Advance SAGE Open Research and global inequities of carbon markets warn that such commodification of carbon turns emissions reduction responsibilities into an investment field for private entities, international consulting firms, and carbon brokers, driving corporate greenwashing and what has been feared to be a long-term emissions lock-in. Indeed, the financialisation of nature through various false solutions, from carbon markets to “natural” gas, carbon capture and storage (CCS) or other geoengineering schemes, drives widespread "green grabbing" and distracts from real emissions reduction. Furthermore, carbon markets today continue to drive the expropriation of communally held land for commercial timber plantations or protected offset zones in the guise of reforestation, as captured in the introduction of the Journal of Peasant Studies research, Green Grabbing, a new appropriation of nature.

Cameroon

Cameroon's third NDC (October 2025) commits to cutting GHG emissions 41% below business as usual by 2035. Specifically, 14% unconditional and 27% conditional. The NDC target relies on two main sectors primarily. Energy carries 46.0% of the 2030 target (20,745 Gg CO_2eq) and 54.3% of the 2035 target (34,297 Gg CO_2eq). Forestry then carries 41.8% (18,852) and 31.8% (20,074). The rest comes from waste (8.0% and 9.7%), agriculture (3.5% and 3.4%) and industry (0.7% and 0.9%). The totals are 45,102 Gg CO_2eq in 2030 and 63,157 Gg CO_2eq in 2035 (Table 7, p 19-24).

Cameroon's NDC lists “accélération de la transition énergétique et promotion des énergies renouvelables” (accelerating the energy transition and promoting renewables) first among its national priorities (p.28), and its energy key message is to reach 25% renewables, excluding large hydro, by 2035 (p.17). Yet renewable energy measures account for 2.9% of the 2030 target and 3.4% of the 2035 target (see figures on p.22), despite the NDC repeatedly listing the sector as prominent and featuring it in its key message banners (p.4, p.17).

The NDC not only reflects a concentration of efforts in two sectors, but also a concentration at the level of individual measures. Just two of the 56 measures carry 45% of the total 2030 target and 42.4% of the total 2035 target. Namely, “Efficiency in industries” accounts for 19.5% (2030) and 23% (2035), with an investment need of $1.32 billion (2030) and $2.18 billion (2035), yet the NDC provides few, if any, implementation details. The second measure is “Reforestation,” which accounts for 25.5% and 19.4% of the 2030 and 2035 targets, against the goals of 5 million hectares and 8 million hectares, respectively. Cameroon's household energy efficiency measures account for approximately 12% of its 2030 target and 14% of its 2035 target (based on calculations from Table 7, p.20-21]. They are dominated by Liquefied Petroleum Gas (LPG) stoves replacing wood stoves and improved cookstoves, alongside ecological charcoal stoves, LED lighting and electric cookers. The NDC also signals that Article 6 and the international sale of carbon assets could finance parts of the plan (p.32, 53-54).

Finally, Cameroon states its intention to “augmenter sa production de pétrole et de gaz” (increase its oil and gas production) (p.8). Overall, the plan is primarily an industrial efficiency and reforestation package with financing mechanisms heavily linked to Article 6 and carbon markets, given that “Cameroon is in favor of participating in the financial and cooperation mechanisms provided for in Article 6.” (p. 32) ("Le Cameroun est favorable pour une participation aux mécanismes financiers et de coopération prévue à l'article 6").

Nigeria

Nigeria updated and submitted its 3rd NDC in September 2025, committing to an absolute economy-wide greenhouse gas emissions reduction of 29% by 2030 and 32% by 2035 compared to a 2018 base year (one of its peak GHG emissions years). This marks a notable shift away from percentage reductions based on speculative business-as-usual (BAU) baselines to fixed absolute targets, aiming for an absolute reduction of 168.2 Mt CO_2eq in 2030 and 184.9 Mt CO_2eq in 2035.

The plan encompasses five primary fields: Energy, Industrial Processes and Product Use (IPPU), Agriculture, Land Use, Land-Use Change and Forestry (LULUCF), and Waste. Financial requirements to implement the plan from 2026 to 2035 are estimated at a substantial USD $337 billion. Of this total, $195 billion is dedicated to mitigation, $141.5 billion to adaptation, and $0.5 billion to Action for Climate Empowerment (ACE). The financing strategy relies heavily on international cooperation, with 80% ($270 billion) conditional on external support and 20% ($67 billion) financed unconditionally through domestic resources.

Rather than planning to completely phase out fossil fuels, Nigeria's mitigation priorities focus on reducing emissions within production, targeting zero routine gas flaring by 2030 and a 60% reduction in fugitive oil and gas emissions by 2035. Nigeria's NDC makes it clear that its oil and gas industry "is called upon to further grow" where "natural gas use will be boosted" (p.5). In fact, the NDC sets a target to integrate a 50% renewable energy share into the electricity generation mix by 2030, though 48% (17,000 MW) of this goal relies on natural gas (Table 2, p.16), meaning that Nigeria's renewable energy generation target is effectively half the size it claims to be.

In transport, the NDC maps out an e-mobility rollout targeting 30% electric vehicles, and 20% compressed natural gas (CNG) vehicles by 2035. It also targets Bus Rapid Transit reaching "22% of passenger kms travelling by bus" (p.17). The NDC does not specify how CNG supply infrastructure will be developed. A major portion of the country's projected mitigation potential is expected from the land sector, where Nigeria aims to cut its deforestation rate by 60% and plant 25 million trees annually (p.19). However, the NDC also makes clear that Nigeria's Carbon Market Activation Policy will help make this possible, further positioning Nigeria to become a regional leader in land-based carbon credits (see p.II).

South Africa

South Africa's second NDC, dated October 2025, commits to annual net emissions of 320 to 380 Mt CO_2eq in 2035 (Table 2, p.18). This is a fixed emissions range, not a reduction measured against a baseline or a business-as-usual scenario. The NDC does not break the target down by sector or year, which seems deliberate. The plan states that the target does "not take the form of PAMs" (policies and measures) and that how it is achieved is South Africa's "prerogative to adjust" (p.19). Total investment needs for 2026-2035 are ZAR 3.72 trillion (equivalent to approximately USD $223 billion based on October 2026 conversion). Of that, ZAR 3.47 trillion is for mitigation and ZAR 250 billion for adaptation (Table 3, p.22). Mitigation therefore makes up 93.3% of the stated need, but the NDC breaks down only adaptation by objective and cost.

The list of potential measures is still available in a separate document, though. The NDC refers to "detailed analysis and modelling of mitigation policies and measures" carried out by the University of Cape Town (UCT 2025b). The August 2025 draft includes more than 60 policies across several scenarios. It does not say which measures the government will take, and in fact the NDC does not adopt any of them specifically. As a result, it is unclear how South Africa will implement its policies to reach its target range.

The UCT modelling also lists natural gas and CCS among the technologies it can draw on. However, it is uncertain whether they form part of any plan. Furthermore, the NDC's long-term goal is net-zero CO_2 emissions by 2050. It is worth noting that net-zero CO_2 emissions do not necessarily include other GHG emissions, such as methane. Finally, on Article 6, the NDC states that South Africa "expects most mitigation to result from domestic measures", and that "any" ITMOs will apply the standards of the Paris Agreement Crediting Mechanism, to be "further elaborated in a domestic guiding framework" (p.32). The NDC does not state whether any Article 6 arrangement is in place.

While the NDC strengthens adaptation commitments - expanding to eight national goals for 2031–2035 - and introduces dedicated sections for loss, damage, and vulnerable groups, a critical climate justice gap remains in its international financing. According to data from the 2024 Biennial Transparency Report, of the USD 827.69 million received during 2021–2022 (p.195), a staggering 80% was delivered as loans, with mitigation grants at 6% and adaptation at less than 1% (Table 4.7). Anchored in the Climate Change Act, the Second NDC offers a stronger foundation than its predecessor by linking climate action directly to national development priorities like poverty and inequality. However, the ultimate challenge remains ensuring these commitments translate into adequately funded, socially inclusive, and tangible improvements in citizens' lives rather than remaining unrealised pledges.

Togo

Togo's third NDC (May 2026) covers 2026-2035. It commits to cutting emissions 52% below business as usual in 2035, a reduction of 47,900 $ktCO_2e$. The NDC´s targets are 15.7% unconditional and 36.4% conditional (Table 6, p.19). Its 48 mitigation measures are costed at 1,760.5 billion FCFA (about USD $3.20 billion), out of a total cost of 3,288.5 billion FCFA (USD $5.98 billion). Of that total, 69.9% is conditional on external support (Table 32, p.84). By share of the NDC's target, transport carries 34.3% (16,427 $ktCO_2e$), AFAT/forestry 21.9% (10,500), stationary energy 15.1% (7,253), waste 13.6% (6,520), agriculture 13.6% (6,500) and industrial processes 1.5% (700) (Table 1, p.2 and Table 12, pages 38-41).

Togo's largest mitigation sectors by planned investment are transport and stationary energy, at roughly a third each of the 1,760.5 billion FCFA mitigation budget, although the NDC's own figures conflict on which is larger. Furthermore, Togo targets an increase in clean cooking access from 20% to 90% by 2035 (Table 9, p.33), noting that “86 % des ménages cuisinent au bois-énergie, exposant 4,3 millions de personnes à la pollution domestique” (86% of households cook with wood, exposing 4.3 million people to household air pollution) (p.25). It also lists a Gold Standard cooking programme among its financing levers (p.89) and describes clean cooking as the safest “quick win” for carbon credits (p.92).

Togo's largest single mitigation investment is its 1 GW solar PV programme (E13), at 396.46 billion FCFA, about 22.5% of mitigation investment (see figures on p.40). Yet Table 12 credits it with a reduction of just 2.1 Gg CO_2 per year, compared with 1,024.2 Gg for an e-cooking programme costing 31 billion FCFA (p.40). The NDC gives a different figure for the same solar programme in its text: 343 billion FCFA (p.41).

However, the NDC also shows discrepancies across its sectoral targets and measures. For example, the only reductions the NDC gives for individual measures add up to 14,803 Gg CO_2 a year, about 31% of the entire target. Table 12 calls these figures the “potentiel de réduction annuelle” (annual reduction potential) but does not say which year they apply to (p.38). For transport, the largest sector, the listed measures add up to 1,021 against a target of 16,427 (p.40). It is therefore unclear what measures or activities make up the difference. The NDC also calls reforestation the “épine dorsale” (backbone) of the land sector, but contains two different values across the NDC: Table 12 puts it at 8,191.8 Gg CO_2 per year (p.38) (equivalent to 8.19 $MtCO_2$ a year), while page 44 states “1,622 $MtCO_2e$ séquestrés par an” (1.622 $MtCO_2e$ sequestered per year), meaning the former figure is about five times the latter. The NDC also aims to raise access to clean cooking from 20% in 2025 to 90% in 2035 (Table 9, p.33). Finally, it includes a dedicated section on carbon markets, with the first ITMO transfer expected in 2027 (Table 31, p.82; p.89-93).

Uganda

Uganda's updated NDC is from September 2022, which predates the first Global Stocktake and has no 2035 target. It commits to reducing net emissions by 24.7% below business as usual by 2030, with 5.9% unconditional and 18.8% conditional. This is an absolute reduction of 36.76 $MtCO_2e$ (Table 3-3, p.29). Implementation of the NDC is estimated at USD $28.1 billion (p.48). Specifically, $17.7 billion for adaptation, $10.3 billion for mitigation, and $0.1 billion for crosscutting, with $4.1 billion coming from domestic resources (see executive summary). The document presents an economy-wide plan across five sectors. In practice, AFOLU carries 30.4 $MtCO_2e$, or 82.7% of the target. Transport accounts for 2.78 $MtCO_2e$ (7.6%), energy excluding transport for 2.34 $MtCO_2e$ (6.4%), waste for 1.10 $MtCO_2e$ (3.0%), and IPPU for 0.14 $MtCO_2e$ (0.4%) (Table 3-3, p.29). The NDC states that its priority AFOLU measures "are from REDD+ activities, based on the National REDD+ Strategy and Action Plan published in 2017" (p.30).

Uganda's renewable energy measure is credited with "approximately 0.0003 $MtCO_2e$ by 2030" (Table 3-6, p.34), less than 0.001% of its national target. This is despite 756.8 MW of hydropower across 26 named plants, including Karuma, as well as 25 MW of bagasse, 20 MW of solar and 20 MW of wind, all due online between 2015 and 2030 (p.34-35). The low figure likely reflects a grid already dominated by hydropower, which the NDC acknowledges elsewhere. The mitigation burden instead falls on AFOLU, which carries 82.7% of the target (see p.iii).

The NDC has no single table of measures, so the researchers of this study compiled the 28 measures listed between p.30-46 that carry a figure into one table. Although compiled totals differ slightly from the NDC's own sector totals, and it is unclear why, the concentration of measure is clear. Three of the 28 measures carry 46% of the target, led by commercial plantations (27.2%) and fuelwood and charcoal stoves (18.7%). Notably, the two measures aimed at restoring natural forest carry 0.6 $MtCO_2e$ combined, or 1.6% of the target (p.31-32). The NDC therefore assigns over fifteen times as much of its target to commercial plantations as to natural forest restoration.

False Solutions Taking Root Across the Continent

Digging deeper, a critical evaluation of global climate governance reveals a profound paradigm divide between genuine climate action and the market-centric mechanisms currently embedded across national policies. Real solutions require absolute, source-level greenhouse gas emissions reductions, a phased retirement of fossil fuel infrastructure, and the rapid scale-up of community-led, decentralised renewable energy systems that protect regional food sovereignty.

Conversely, false solutions encompass a range of techno-fixes, disinformation schemes and market-based mechanisms centred around the fallacy of Net Zero - including but not limited to carbon offsetting, geoengineering, "natural" gas, and unproven carbon capture technologies - all of which prioritise profits over atmospheric and environmental integrity. Below are examples of false solutions present across the various NDCs.

Net zero

"Net" zero targets allow greenhouse gas emissions to continue, often for decades, on the assumption that carbon offsets, tree plantations or carbon removal technologies that remain unproven at scale will cancel them out later. Climate scientists have described this as a "burn now, pay later" approach that serves as "a blank cheque for the continued burning of fossil fuels." The sinks these combined plans require "would exceed the sequestration capacity of the planet by several-fold." Furthermore, the burden of absorbing emissions tends to fall on land and communities in the Global South, which are least responsible for the crisis. Net-zero mechanisms such as offsetting do not reduce emissions domestically and allow polluters to claim climate leadership while deferring real cuts, using up valuable time and resources.

- **Nigeria:** Net zero by 2060 runs through Nigeria's NDC repeatedly. The 2030 and 2035 targets are described as steps "towards net zero by 2060" (p.14). Indeed, the goal is to be "accomplished through a combination of significant emissions reductions and enhanced removals" (p.44). By embracing net zero, the NDC explicitly allows "an increase in GHG emissions in the short-term" (p.47), with removals clearly named as part of the route (see below).

- **South Africa:** South Africa's long-term goal is a "just transition to net zero CO2 emissions by 2050", which is repeated across the NDC (p.4, p.20, p.37). South Africa has "nationally determined the year as 2050 and CO2 emissions as the relevant greenhouse gas" (p.20). Doing so, South Africa explicitly excludes other potent greenhouse gases such as methane and nitrous oxide. Furthermore, its pathway for getting there is not actually in the NDC.

- **Togo:** Togo's NDC presents itself as part of a broader strategy described as a "Cadre stratégique de neutralité carbone" [strategic framework for carbon neutrality] (Table 5, p.15, also p.9). The NDC makes various references to carbon neutrality under the Long-Term Low Greenhouse Gas Emission Development Strategy (LT-LEDS) for 2060, and its use of land and forest sector sinks (AFAT) (see below) is one of the technical and financial foundations of its carbon neutrality trajectory to 2060 (p.43).

Carbon offsets and markets

Carbon offsets turn emissions cuts into a tradable commodity, letting polluters buy their way out of reducing GHG emissions at source. For decades, the voluntary carbon market (VCM) has been riddled with methodological weaknesses and project failures. As of 2024, so-called reform has yet to improve, with most of the top 100 carbon offset projects (nearly a quarter of the entire VCM at the time) still considered unreliable enough to deliver a one-tonne reduction. From the projects assessed in the study, 93% were located in the Global South. Despite exacerbating global inequality and decades of failure, VCM actors continue to claim that the market can deliver on its emissions reduction promises. From widescale failures across cookstove and forestry projects (which include plantations) to countless methodological flaws, carbon markets are nowhere near the level of integrity they claim to be. Ultimately, the macroeconomic consequence of this financialization is the rapid commercialisation and commodification of nature, where complex tropical biomes are valued solely by a flawed estimated dollar amount of carbon they hold rather than their ecological integrity.

- **Cameroon:** Cameroon's NDC states that it is "favorable pour une participation aux mécanismes financiers et de coopération prévue à l'article 6" (is in favour of participating in the financial and cooperation mechanisms under Article 6) (p.32). Its finance section expects that "certains investissements privés pourraient contribuer à générer des actifs carbones dont la cession au niveau international pourrait financer certaines actions de cette CDN" (some private investments could help generate carbon assets whose sale abroad could finance some of this NDC's actions) (pp.53-54). The likely supply of credits is forest-based, since forestry carries 41.8% of the 2030 target and 31.8% of the 2035 target (Tables 4-5, p.14-15).

- **Nigeria:** The NDC states that Nigeria intends to use voluntary cooperation under Article 6 and Nigeria's Carbon Market Activation Policy (CMAP) estimates it could unlock a market worth "$736 million and $2.5 billion by 2030" (p.21). In fact, CMAP itself states that "As Africa's largest economy, Nigeria is poised to lead as Africa's hub for high integrity carbon market investments" (p.III).

In this context, the NDC further states that "In 2030, the LULUCF sector (73.7%) will contribute the most in terms of absolute emissions reduction" (p.15) thereby making it clear where Nigeria plans to put most of its mitigation efforts in. Additional reference to cookstove-based carbon credits further exemplifies how the NDC is turning heavily towards carbon markets to reach its mitigation targets. In countries like Nigeria, loopholes allow ongoing industrial emissions to be theoretically balanced out on paper by land-based sinks. Instead of forcing deep industrial retrofits, it serves as a shield to mask local extraction pipelines and justify long-term fossil fuel lock-in.

- **Togo:** In its NDC, Togo dedicates an entire section to carbon markets (pp.89-93), and the NDC states that Togo is negotiating with Switzerland, Singapore, Norway and South Korea, with the first Internationally Transferred Mitigation Outcomes (ITMOs) transfer expected in 2027 (Table 31, p.82), stating that the ITMO legal framework "est exigé par les partenaires bailleurs (FVC, Banque mondiale, AFD, BAfD)" [is required by the donor partners (GCF, World Bank, AFD, AfDB)] (footnote 28, p.79). Under its current plan, Togo is poised to sell GHG emissions reductions to foreign states which will effectively prevent it from counting reductions towards its own national climate action ambitions.

  Furthermore, Togo's reforestation measure (#A5), titled "Large-scale reforestation of 1 million ha (fuelwood, local species, coconut plantations…", is single-handedly the largest measure responsible for a reduction of 8,191.8 Gg CO_2/yr (equivalent to 8.19 $MtCO_2$ per year) (see Table 12, p.38). As a result, out of 48 measures in Togo's NDC, this reforestation, which includes large-scale plantation measures, makes up 55% of the NDC's measure-level reductions, with clear financing links to carbon markets. In the context of community reforestation, Togo's forest funding gap is "à combler prioritairement par l'Article 6 et le mécanisme REDD+" [to be filled primarily through Article 6 and the REDD+ mechanism] (p.46), all in all demonstrating the depth of Togo's commitment to using carbon markets and land-based removals as a core vehicle to advance its NDC.

- **Uganda:** Uganda's NDC clearly states that it "will use voluntary cooperation provided for in Article 6 in accordance with the National Climate Change Act 2021" (Annex 1, p.57). Its Agriculture, Forestry and Other Land Use (AFOLU) sector carries 30.4 $MtCO_2e$, or 82.7%, of the national 2030 target (Table 3-3, p.29). The NDC states that the AFOLU priority measures "are from REDD+ activities, based on the National REDD+ Strategy and Action Plan published in 2017" (p.30).

Of the 28 measures, three account for 46% of Uganda's target. Two of these measures are large-scale commercial pole and timber plantations at 5 $MtCO_2e$ each, together making up 27.2% of the total target. The third is energy-efficient fuelwood and charcoal stoves at 6.89 $MtCO_2e$, or 18.7% (Table 3-4, p.31-32). In comparison, the two measures that restore natural forests meaningfully carry just 0.3 $MtCO_2e$ each, together making up 1.6% of the national target (p.31-32). As a result, Uganda's NDC basically assigns over fifteen times more of its climate target to commercial plantations than to natural forest restoration. In fact, timber from these plantations is expected to be used to "enhance production of wood products, especially small poles, fuelwood, and charcoal" (p.31), meaning any carbon credited to these plantations could likely be burned and released again.

A report from the Oakland Institute documented how Ugandan locals were evicted for carbon credits and confirms how commercial forest plantation credits drive widespread "green grabbing." This financialised appropriation of nature results in the violent expropriation of communally held land, inflicting severe land displacement on smallholder farmers, the depletion of local water tables, and the collapse of traditional agroecological food security networks at the direct expense of local communities.

Natural gas and transition fuels

Also known as "clean" gas, natural gas is purely a marketing claim, and not a scientific or credible climate term. Natural gas is primarily made up of methane, and Shell documents from 1966 point to early knowledge of methane pollution from natural gas. Yet by 1971, industry advertisers were proposing to brand gas as clean energy. That narrative has since underpinned the expansion of fracking, pipelines and export terminals, locking in a fossil fuel whose methane is an incredibly potent driver of warming. According to NASA, methane is responsible for approximately 30% of Earth's global warming since the Industrial Revolution.

- **Cameroon:** The NDC calls for investment in "l'hydroélectricité, le gaz et d'autres énergies propres à l'instar de l'hydrogène et de l'ammoniac" [hydropower, gas and other clean energies such as hydrogen and ammonia] (p.8). Its energy policy retains "le thermique à base de gaz naturel" [natural gas-fired thermal power] in its energy mix (p.8). Placing gas amongst other clean energies reinforces the false narrative that natural gas is a clean or renewable source of energy, thereby making Cameroon's overall renewable energy targets and build-out questionable.

- **Nigeria:** The NDC says natural gas will serve "as a key transition fuel" (p.5), and it repeats the framing on p.9 and p.41. In fact, the NDC sets a target to integrate a 50% renewable energy share into the electricity generation mix by 2030, except that 48% (17,000 MW) of this goal relies on natural gas (Table 2, p.16). This means that Nigeria's renewable energy generation target is effectively half the size it claims to be, and about the same size as its natural gas generation buildout, on top of its current fossil fuel-heavy energy mix.

- **South Africa:** South Africa's NDC refers readers to "technical reports (UCT 2025a, b)" for "detailed sectoral and programme-level breakdowns" (p.22). The University of Cape Town (UCT) study is therefore the NDC's technical backbone. It refers to natural gas and builds new gas power into its core scenarios. Its baseline sees gas capacity rise "to 7.5 GW" by 2035 (p.82).

This section reveals a dangerous alignment across African countries, where many NDCs explicitly or implicitly rely on carbon markets, natural gas, and net-zero framing to manufacture an illusion of climate action while shielding big polluters from regulatory accountability. Indeed, this net-zero framing, whether stated explicitly or not, functions as an accounting fallacy by creating a false equivalence between permanent geological fossil fuel releases and temporary, often volatile, superficial, and unproven carbon storage.

The Climate Finance Trap: Dependency and Predatory Schemes



Implementing these Nationally Determined Contributions (NDCs) depends heavily on international financing structures, creating deep financial reliance across Sub-Saharan Africa that is tied to global climate debt dynamics. This structural divide between headline climate goals and the lack of unconditional domestic funding means that when a country's climate blueprint is up to 80% dependent on external support, sovereign policy becomes highly vulnerable to foreign priorities. This reveals a worrying historical trend where a vast majority of climate finance delivered to developing nations has arrived in the form of concessional loans rather than debt-free grants, risking trapping states in cycles of debt distress and exposing why regional delegations must demand liability-based climate reparations from high-emitting nations to cover these multi-billion-dollar funding gaps. The NDCs studied in this assessment are no exception to these financial dynamics.

- **Cameroon's** NDC 3.0 estimates implementation costs towards 2035 at USD $40.93 billion (p.53), of which USD $33.76 billion is for adaptation and USD 7.17 billion for mitigation (p.52), although the adaptation budget includes USD 6.33 billion for energy, including renewable capacity (p.38 and p.52). Unlike Nigeria, Togo and Uganda, Cameroon does not divide these costs into unconditional and conditional shares. In fact, the split applies only to its GHG emissions target, which is 14% unconditional and 27% conditional on international support by 2035 (see p.5).

- According to **Nigeria's** NDC, implementing its climate commitments over 2026-2035 will require approximately US$337 billion, comprising US$195 billion for mitigation and US$141.5 billion for adaptation (p.21). Nigeria **"will attempt to mobilise domestic resources to meet the unconditional 20%, that is US$67 billion",** while "the remaining US$270 billion (80%) should originate from international funding" (p.21). As with other NDCs in this study, this indicates a significant dependence on external support to achieve its climate targets.

- In the case of South Africa, while there is no clear allocation of domestic vs. international conditional financing needs, the NDC does state that "international assistance in climate finance and technology will remain pivotal to the successful implementation of this NDC" (p.22).

- **Togo** estimates that implementing its NDC will require 3,288.5 billion FCFA (about USD 5.98 billion) over 2025-2035, of which approximately 1,760.5 billion FCFA is allocated to 48 mitigation measures (p.33, p.84). **Approximately 69.9% of the total requirement is conditional on international support,** for which the NDC refers to the Green Climate Fund, the Adaptation Fund and GEF's Least Developed Countries Fund (LDCF) (p.84). This indicates a substantial dependence on external finance to achieve its climate targets.

- **Uganda's** updated NDC (September 2022) estimates the total cost of implementation at USD 28.1 billion, comprising US$17.7 billion for adaptation, US$10.3 billion for mitigation and US$0.1 billion for cross-cutting governance measures (p.48). However, Uganda's domestic contribution is estimated at only US$4.1 billion (15%), leaving a funding gap of approximately US$24 billion to be mobilised internationally. This means that approximately **85.4% of the total is conditional upon the mobilisation of foreign capital and international support,** highlighting the country's massive dependence on external climate finance to implement its climate commitments.

The immense gap between the headline ambitions of these Nationally Determined Contributions (NDCs) and actual domestic funding commitments highlights the urgent need for genuine climate finance rooted in justice, specifically, Global North reparations and frameworks that operationalise the core mandate to make big polluters pay. By failing to secure non-debt liabilities or direct wealth transfers from historical emitters, these architectures risk opening the door to predatory private financing, high-interest concessional debt, and volatile carbon financing schemes that must be protected against.

Parallel Fossil Fuel Expansion

Severe structural contradictions exist across African climate governance where ambitious international climate promises run directly parallel to active domestic fossil fuel infrastructure expansions, thereby contradicting the broader visions of Africa's NDCs. This parallel fossil fuel expansion is not captured by NDC targets. Under the IPCC guidelines used for UNFCCC reporting, national inventories are territorial, meaning that emissions from burning exported fuels are reported by the country where they are burned, not by the producing country. A producer can therefore expand extraction for export while its NDC accounts only for emissions from production itself, such as flaring, venting and fugitive methane, and not for the combustion of the fuels it sells.

- **Cameroon:** Its NDC openly states an intention to expand oil and gas production. Specifically, it "envisage d'accentuer ses efforts de prospection pour accroître ses réserves et augmenter sa production de pétrole et de gaz" (intends to intensify prospecting to increase its reserves and raise its oil and gas production), with a focus on new onshore basins in the north (see p.8). Additionally, the NDC cites proven gas reserves of 157 billion m^3 and states that the country "doit absolument attirer des investisseurs pour explorer et développer des projets structurants portant sur... le gaz" (must attract investors to explore and develop major projects in... gas) (p.8). The NDC also expects the mining sector to grow exponentially by 2030. In May of 2026, Cameroon awarded five of nine national oil blocks to various fossil fuel operators, including Murphy Oil and Octavia Energy.

- **Nigeria:** Nigeria's climate NDC reflects a parallel dynamic of fossil fuel lock-in within the country's energy transition strategy. Although the NDC emphasises increasing the share of renewable energy in electricity generation, it also states that the oil and gas industry, which provides two-thirds of government revenue and 90% of foreign exchange earnings, "is called upon to further grow", and that "natural gas use will be boosted" (p.5). As noted previously, gas features as a core energy measure. Namely, 17,000 MW of gas generation (Measure 1) and 7 GW of captive generation, half of its gas (Measure 3) (p.16). The NDC acknowledges that the economy "is fossil fuel-based" (p.20) and that its net-zero pathway allows "an increase in GHG emissions in the short-term" (p.47). Nigeria's flaring and fugitive-emissions targets (p.17) reduce emissions from continued production but do not actually limit oil and gas production itself, thereby locking the country into natural gas dependency for decades to come.

- **South Africa:** The NDC contains no commitments to expand fossil fuels, expansion does appear within its UCT technical study which the NDC drew on. The study models LNG import terminals (p.35), an option to refurbish the Durban refineries or build a new one (p. 49 and 74), and a lifeline extension of the Eskom coal plant (p. 38 and 139). Although it is important to note that these are modelling trajectories based on possible scenarios, and not NDC commitments. Nonetheless, the study makes it clear that the the move away from coal depends partly on new imported-gas infrastructure, and the NDC makes it clear that this study is the plan's technical foundation.

Informational Gaps

This section reveals weaknesses, mathematical inconsistencies, and stark misalignments between public-facing climate rhetoric and underlying implementation realities. A recurring pattern across these frameworks is a severe concentration of targets into a handful of poorly defined measures.

South Africa sets a fixed emissions range of 320 to 380 Mt CO_2eq for 2035 (Table 2, p.18) and "does not have a reference indicator" against which reductions are measured (p.31). In fact, it contains no sectoral or annual breakdown of the target, stating that its targets "do not take the form of PAMs, and how our mitigation targets are achieved is our prerogative to adjust" (p.19). Investment needs for 2026-2035 are given as ZAR 3.47 trillion for mitigation and ZAR 250 billion for adaptation (Table 3, p.22), or about ZAR 3.72 trillion combined, of which mitigation is 93.3%. The NDC states that breakdowns are "provided in Sections 3 and 5" (p.22), but only adaptation is broken down. The NDC instead points to the University of Cape Town's draft technical analysis (UCT 2025b, p.19), which assessed 64 policies and plans (p.59) and modelled 7 scenarios with 92 variants (p.72), but the NDC does not adopt any of them. It is therefore unclear which measures, including gas-fired generation, form part of the government's plan. Finally, the NDC's 2050 net-zero goal covers CO_2 emissions only (p.20), although the 2035 target covers all gases (p.17).

Togo's transport sector is the largest at 34.3% of the target (Table 1, p.2), the listed measures add up to 1,021 kt against a sectoral target of 16,427 kt (calculation based on figures in pages 38-41). And the NDC does not name this discrepancy nor identify how this gap is closed. For reforestation, which it calls the "épine dorsale" (backbone) of the land sector, it gives three figures: 8,191.8 Gg CO_2 per year (p.38), 1.622 MtCO_2e per year (p.44), and 10.5 MtCO_2e by 2035 (footnote 21, p.44), making it unusually difficult to assess which is the correct figure.

In the case of Uganda, its NDC covers 2020-2030 and contains no 2035 target as it was finalised before the first Global Stocktake. Uganda commits to a 24.7% reduction below business-as-usual by 2030 (p.28). Sector totals are consolidated in Table 3-3 (p.29), but measure-level figures are spread across sectoral tables and do not always reconcile with those totals. For example, the energy measures in Table 3-6 add up to about 2.08 MtCO_2e, against 2.34 MtCO_2e in Table 3-3 [calculations based on pages 29 and 34-35).

Cameroon's NDC 3.0 commits to reductions of 38% by 2030 and 41% by 2035 below business-as-usual (p.5), but its headline messaging and its figures diverge. The NDC contains several sections where renewables are seemingly prominent, and its energy sector key message is to "porter à 25 % la part des énergies renouvelables hors grande hydro dans le bouquet électrique en 2035" (raise the share of renewables, excluding large hydro, to 25% of the electricity mix by 2035) (p.17). Yet the renewable energy measures carry only 2.9% of the 2030 target and 3.4% of the 2035 target, less than half the reduction attributed to flaring reduction at oil fields and refineries (see figures on pages 21-22).

Who is Benefiting from the Status Quo?

International Financial Institutions and Private Consultants

Private consulting firms, transnational carbon brokers, and international registries reap immediate financial returns by managing, structuring, and auditing these carbon frameworks. For example, Togo outsourced the drafting of essential technical deliverables for its mitigation, adaptation, and investment planning to Cibola Partners SAS (pages 106, 67 and 83), a private carbon advisory firm based in Paris, which secured direct backing for these workflows. Furthermore, Togo's upcoming national carbon registry is strategically designed to be deployed through the technical and operational support of an external private partner, allowing the private entity to extract direct financial value from the domestic carbon tool's infrastructure.

Big Polluters

In South Africa, the political economy of the climate transition is heavily influenced by domestic corporate interests through state-backed academic modelling. The University of Cape Town's (UCT) technical baseline modelling study, which serves as the foundational analytical framework informing the country's emission trajectories, explicitly builds the internal corporate decarbonisation roadmaps of Sasol (the chemical and synthetic fuel giant) and AMSA (ArcelorMittal South Africa, the nation's primary steel producer) directly into one of its primary national baselines. This institutional alignment enables major domestic industrial polluters to use state-backed guidance documentation and international climate finance attraction mechanisms, such as those linked to the official South Africa Just Energy Transition Investment Plan (JET-IP), to insulate and validate their pre-existing corporate operations under the flexible banner of international climate compliance.

In Cameroon, transnational extraction corporations benefit from explicit state policies designed to intensify oil and gas prospecting and expand access to unexploited fossil reserves. The national framework openly targets the development of unexploited oil and gas reserves. According to national investment tracking compiled by the Cameroon Extractive Industries Transparency Initiative (EITI), the state has awarded five of nine oil field blocks to Murphy Oil and Octavia Energy, which have entered into advanced contract negotiations, while Chevron has expressed formal commercial interest. This allows foreign corporate operators to aggressively advance extraction interests under the support of an internationally recognised NDC.

The Bigger Implication: Why Action is Urgent

An immediate, structural overhaul of global carbon governance is urgently required to halt an escalating socio-ecological and economic catastrophe across the African continent. Because historical climate finance primarily arrives as high-interest concessional loans rather than debt-free grants, sovereign nations face a severe, immediate "readiness deficit" that drains domestic budgets. This leaves countries exposed near the absolute bottom of global adaptation readiness index scales.

This economic strain worsens immediate localised climate shocks, which have already caused an alarming 34% reduction in Sub-Saharan agricultural productivity growth since 1961. Delayed systemic intervention guarantees the compounding collapse of regional economies. By continuing to treat volatile biological forests and soil as fictional accounting tools to offset permanent geological emissions, these NDCs allow transnational corporations to rapidly scale up domestic oil and gas extraction while claiming international compliance on paper. This accounting loophole ensures parallel fossil fuel expansion, enabling countries to open offshore extraction blocks to transnationals and lock in massive gas infrastructure under the guise of clean energy.

The social and environmental costs of this financialisation demand immediate, defensive mobilisation to prevent permanent displacement. Shifting the mitigation burden onto land sectors triggers a dangerous wave of "green grabbing," where communally held forests and farmlands are violently expropriated for commercial timber plantations and private offset zones.

Policy Recommendations

For African Delegates and the African Group of Negotiators

1. **Ban Net-Zero Accounting Fallacies:** The AGN must reject predatory carbon finance, Article 6 offsetting, and net-zero accounting fallacies that equate volatile biological sinks with permanent geological fossil fuel releases.

2. **Establish Strict Anti-Logging Ceilings:** NDCs must outlaw accounting biases prioritising commercial logging over biodiversity, such as Uganda's NDC allocating 15 times more of its target to commercial plantations (27.2%) than to natural forest ecosystem restoration (1.6%).

3. **Exclude Corporate Polluters from Policymaking:** Enact binding conflict-of-interest laws to bar fossil fuel giants from drafting climate plans and embedding corporate roadmaps into national baselines.

4. **Reject Article 6 Carbon Markets:** Eliminate market-based mechanisms that commodify nature, underprice carbon assets, and surrender state mitigation counts to foreign buyers.

5. **Institutionalise Grassroots Land Vetoes:** Grant smallholders and Indigenous communities legal veto power over territorial land allocations to stop violent **"green grabbing"** and agricultural collapse.

6. **Demand Debt-Free Reparations:** Reject high-interest concessional loans that force climate-vulnerable states to spend more on debt than climate action, demanding direct, non-debt liabilities from historical emitters.

For Civil Society, Media, and Concerned Interests

7. **Expose Parallel Fossil Fuel Expansions:** Cross-verify green rhetoric against active extractions to expose states expanding oil fields, pipelines, and gas generation under the guise of climate compliance.

8. **Deconstruct "Clean Gas" and Net-Zero Fallacies:** Launch media campaigns debunking natural gas as a clean transition fuel and expose "net-zero" as an accounting loophole that masks potent methane emissions.

9. **Audit Policy Outsourcing and Corporate Capture:** Investigate and expose when core national climate blueprints, carbon registries, and baselines are outsourced to foreign private firms or built around industrial polluter roadmaps.

10. **Document Green-Grabbing Displacement:** Conduct field investigations to map the severe land expropriation, water table depletion, and food insecurity caused by commercial timber plantations and land-based offset zones.

11. **Mobilise for Grassroots Veto Power:** Build strong regional coalitions to demand binding, community-led decision-making, stripping policy control away from private carbon brokers and transnational corporations.

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About the MBPP

The African Make Big Polluters Pay (MBPP) Campaign is a continental movement advancing climate justice, corporate accountability, and climate reparations. Through advocacy, grassroots mobilisation, storytelling platforms, strategic partnerships, and media engagement, the campaign amplifies the voices of frontline communities, challenges corporate impunity and greenwashing, and builds collective action towards a just, equitable, and sustainable future for Africa.



Website: www.makebigpolluterspayafrica.org
Email: contact@makebigpolluterspayafrica.org
Secretariat: Corporate Accountability and Public Participation Africa (CAPPA)
Email: collaboration@cappaafrica.org
Phone no: +2347085915879.