Cautious optimism:

How IMF economic surveillance can foster the green transition

South Africa Case Study



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1 | Economic surveillance at crossroads

Sound economic policies are necessary for meeting the end-goal of the green transition, including through the phasing out of fossil fuel extraction and consumption. From trade policy to fiscal measures and from banking regulations to social protection reforms—all facets of macroeconomic policy have a role to play in bringing about a major shift towards the implementation of climate change adaptation and mitigation measures. Enter the International Monetary Fund (IMF). This international organization has a key mandate to safeguard global economic stability, and has been actively positioning itself at the forefront of the economic policy flank of the fight against climate change. As its Managing Director Kristalina Georgieva outlined, "we embrace the transition to the new climate economy—one that is low carbon and climate resilient, that helps fight the causes of climate change and adapt to its consequences" (Georgieva 2021)

How do the IMF's policies link up to green transition objectives? While the organization may be better known for its lending programs to countries in crisis, an underappreciated core area of its operations is the surveillance of its members' economic policies. For most countries, this exercise is conducted annually or biennially, and its output—a so-called "Article IV report"—sets out the assessments of IMF staff vis-a-vis a country's economic challenges and advice on how to overcome them. Such advice sets the tone of policy debates within countries and informs the decisions of international investors, therefore making it highly consequential.

Until recently, Article IV reports—and the related Financial Sector Stability Assessments (FSAPs)—neglected appropriate coverage of the economic impact of climate change, including the range of physical risks from natural disasters, transition risks due to the shift to a low-carbon economy, and spill-over risks on account of the economic fallout of a green transition in a country's major trading

partners (Gallagher et al. 2021; Ramos et al. 2022; Volz and Ahmed 2020). Even by the IMF's own admission, climate-related analyses were haphazard (IMF 2021a), while civil society has called out the organization's delayed action on this front (Kentikelenis and Stubbs 2021a, 2021b; Kentikelenis, Stubbs, and Reinsberg 2022; Sward et al. 2021). To address these shortcomings and criticisms, the IMF recently announced an overhaul of its surveillance practices to foreground climate concerns.

According to its 2021 Comprehensive Surveillance Review (IMF 2021b), a new era dawns for the IMF's engagement with climate change mitigation and adaptation in its analyses. First, the IMF committed to make strides in assessing how countries can manage the transition to a greener economy. This will entail specifying which revenue and expenditure policies are required, as well as the broader set of regulatory or institutional reforms that can aid this objective. Second, in line with the high-level commitments by Managing Director Kristalina Georgieva (IMF 2020), climate change mitigation measures will be covered regularly for the 20 largest greenhouse gas emitters. Finally, coverage of climate change adaptation and resilience would be undertaken for climate-vulnerable countries every three years, building on the IMF's earlier acknowledgment of adaptation issues—especially for small-island economies and natural disaster-prone areas.

These developments represent a sea change in the practice of IMF surveillance. They reflect the organization's broader acceptance that climate change issues are inherently critical for macro-economic performance (or "macro-critical" in the IMF parlance), and—therefore—covering them is well within the mandate of the organization. In turn, this commits the IMF to adopt a systematic approach to integrating climate-related risks into its surveillance over the coming three years (IMF 2021a).

Operationalizing these decisions, the IMF published a Staff Guidance Note in June

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vulnerable countries

Transition Adaptation Mitigation management **Building resilience** Adjusting to the global Achieving domestic Contributing to the What does it mean? against effects from low-carbon transition emission targets global mitigation effort climate change Why coverin Domestic policy Domestic policy Domestic policy Article IV challenge and inward challenge and inward Outward spillovers challenge consultations? spillover spillover Macrocritical, Strongly encouraged

Macrocritical

Figure 1. Coverage of climate change in Article IV consultations

1/ Coverage on a voluntary basis is always possible

Source: IMF (2022a, 54)

Where to cover? 1/

2022 that spells out the priorities for IMF staff on which climate issues they should cover in surveillance missions (IMF 2022a). The first task is to adequately cover risks and vulnerabilities, with special reference to the potential trade-offs in policy design (e.g., the benefits of "investing in disasterproof infrastructure at the cost of forgoing investment with more immediate benefits"). Second, IMF staff are expected to assess the economic sustainability of its members, and this includes coverage of climate change issues. Finally, staff are supposed to identify spill-over risks—both those for the evaluated country from developments abroad, and those that may emanate for third countries from developments in the evaluated country. These broad guidelines were schematized for operational purposes, as reproduced in Figure 1.

In short, recent developments on the IMF's surveillance apparatus have added an important—and welcome—dimension to the remit of its evaluations, and have explicitly linked these with meeting the terms of the Paris Agreement and their operationalization in countries' Nationally Determined Contributions (NDCs). So, to what extent is the policy advice in recent IMF surveillance reports consistent with enabling countries to

transition away from dependence on fossil fuels? Does it adequately address transition risks resulting from fossil fuel dependence? And is such advice aligned with a just transition that safeguards the rights and needs of the poorest in society?

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2 | What does recent experience suggest?

In this report, we analyse the most recent IMF staff reports for the Article IV consultations in two countries: Indonesia and South Africa (IMF 2022b, 2022c, 2022d, 2022f, 2022e). These two G20 nations rely heavily on fossil fuels for energy and to generate foreign exchange reserves and government revenues from exports (Arinaldo and Adiatma 2019; Rumble and Sidiropoulos 2022). Global efforts to phase out coal and fossil fuels will directly impact Indonesia's and South Africa's energy mix and export markets, and will thus fundamentally alter the economic prospects and livelihoods of their inhabitants. For these reasons, the two countries present crucial cases for an early assessment of current practices in IMF surveillance and how they relate to a phasing out of fossil fuels, including coal, and a just transition. For each country, we first cover positive developments in their coverage of just green transition, subsequently treat areas where IMF advice could hinder such objectives, and conclude by identifying missed opportunities.

In Indonesia, the IMF offered value through its in-depth coverage of green financing, which entails mobilizing private investment to finance Indonesia's adaptation and mitigation commitments. Further, the organization welcomed the Indonesian government's introduction of a carbon tax of 30,000 Rupiah (about \$2) per ton of carbon dioxide equivalent that will apply to coal-fired power plants and come into effect in 2022. The IMF demonstrated genuine consideration of climate mitigation in identifying key limitations of the scheme. For instance, it recognized that since the government provides energy subsidies and sets the price for fossil fuels and electricity, the carbon tax will ultimately not provide an incentive for end-users to transition to renewable energy and/or achieve greater energy efficiency. Further, the IMF endorsed a tax reform bill passed in 2021 to raise additional revenue, which included broadening of excise taxes to include plastic products and the introduction of carbon taxes.

However, the IMF's analysis still contained blind spots. On the fiscal policy side, the organization advocated for a budget deficit ceiling of 3% of GDP by 2023, despite the financing needed to achieve Indonesia's NDC targets alone amounting to 2.8% of GDP annually. Such ambitious targets represent a threat to Indonesia transitioning away from fossil fuel dependence and achieving its climate commitments, as investment on climate adaptation and mitigation measures need to be scaled up. Relatedly, the organization did not adequately reflect on the role of carbon-intensive sectors like coal, oil and gas, and palm oil in driving higherthan-expected revenue performance. These sources of government revenue cannot be relied on in the long-term as Indonesia and its trade partners transition towards a lowcarbon economy, and may thus spell fiscal trouble in the medium- or long-term.

In addition, there were missed opportunities in the IMF's engagement, as the organization offered only negligible coverage of climate change risks and adaptation measures. More concerted attention to this issue may have resulted in a different approach to fiscal policy. For instance, social assistance spending is projected to be at 0.6% of GDP in 2023, which is 0.1% *lower* than it was in 2019. It is difficult to reconcile this cost projection with the expected increase in unemployment as coal production is phased out, or in terms of the anticipated greater frequency and severity of natural disasters—both implying a massive ramping up of social assistance spending. The IMF also did not consider the significant global spill-over transition risks linked to the Indonesian economy's external dependence on fossil fuels and on environmentally unsound extractive sectors such as oil palm production more broadly. China, for instance, is the main importer of Indonesian coal and has already introduced a national carbon pricing mechanism, which could plausibly decrease the country's demand for coal from Indonesia. Another notable absence was a discussion of risks to the banking sector from changes in carbon-intensive asset values. There is high potential for financial instability in the longterm and asset stranding given the country's ambitious NDC mitigation commitments and the centrality of coal phase-out to it.

Turning to South Africa, the acknowledged how the pandemic made climate adaptation and decarbonization transition more challenging. On the one hand, it highlighted that the room for active government support of climate adaptation and decarbonisation transition had been constrained because many state-owned enterprises are highly exposed to carbonintensive activities (e.g., coal-fired power plants, rail, and port infrastructure), which makes them vulnerable to a drop in demand from the decarbonization transition, with potential significant fiscal implications. On the other hand, the IMF outlined how the jobless pandemic recovery will mean

that the migration of low-skilled workers out of the coal value chain will be even more challenging, and that deficiencies in the country's education system further complicate the necessary workforce transition. To address these issues, the IMF advised South Africa to improve the quality of education, apprenticeships, and vocational training schemes to support displaced workers, and to design policies that could bridge the spatial divide between workers' living areas and places where new jobs are created.

In addition, the IMF was constructively critical of South Africa's policies on climate grounds. Its assessment of the country's Economic Recovery and Reconstruction Plan identified important inconsistencies with the aim of a low-carbon economic rebound. The financial system also faced significant physical risks related to natural disasters and transition risks related to coal-based energy generation, and the Article IV analysis included stress tests for how future climate-related policy developments might affect financial stability.

Despite these positive steps, other areas of the IMF's policy advice could potentially hamper green transition objectives. Most notably, the IMF endorsed expenditure cuts to reduce the fiscal deficit from -3.9% of GDP in 2021 to -1.8% by 2023. Such rapid fiscal consolidation can have adverse follow-on implications for economic growth and business activity, which in turn may limit the capacity of households and the private sector to adapt to and mitigate climate change.

In relation to South Africa's energy sector, the IMF argued that reforms to reduce rigidities in the economy are key to accelerate decarbonization of the power sector and transition away from coal. It criticized Eskom, the national power utility, which relies heavily on government transfers and favours large-scale projects in coal,

because the company had actively resisted new entrants into the sector by delaying the expansion of independent power producer programs that would allow for the growth of renewables. Nonetheless, the IMF fell short of recommending additional incentives for investors to enter the renewable energy market or for new forms of large-scale government investment in renewables (i.e., distinct from Eskom). The IMF also identified a need to expedite the authorization process to accelerate significant investments by several mining companies to generate their own electricity, and to reduce regulatory hurdles and tackle a backlog of mining licensing applications to attract investment in the mining sector. The promotion of mining sector investment is clearly counter to a green transition and, as a carbonintensive activity, there is imminent risk that such investments will become stranded assets. Additionally, if mining company electricity generation is based on fossil fuels, then such advice may further entrench fossil fuel dependence.

More generally, the **IMF** provided insufficient recognition of long-term risk to public finances due to the ongoing lowcarbon transition. This represents a glaring omission—especially so given that the IMF explicitly recognizes that South Africa's subpar economic performance over the last decade is the result of economic policies failing to adapt to the end of the commodity price boom of the 2000s. The impending drop in demand, and thus prices, for carbonintensive commodities as South Africa's trade partners commit to decarbonization thus represents a level of urgency that warrants embedding in all projections and assessments of fiscal risk. Further, the IMF also did not evaluate the extent to which fiscal consolidation may impede the ability of the government to scale-up public investment to fulfil the climate adaptation and mitigation programs described in its NDC.

3 | Conclusions and recommendations

The IMF's economic surveillance activities have certainly moved beyond the past modus operandi of relative neglect-but is the glass half-full or half-empty when it comes to the organization's involvement in green transition issues? Our analysis of very recent surveillance reports for Indonesia and South Africa provides grounds for optimism. Coverage of climate change adaptation and mitigation issues appeared more consistent than ever before in Article IV reports (for an analysis of earlier reports, see Kentikelenis and Stubbs 2021a), and the recent Staff provides Guidance Note important directions towards scaling up such work. Further, the analytical work underpinning the climate-related analyses has become much more sophisticated compared to past highly cursory treatment of these issues.

However, there is still room for progress. This is most urgent in three areas:

• Covering trade-offs vis-a-vis the green transition: The IMF's analyses covered here tend to favour steep fiscal consolidation measures, without adequately considering how reduced government expenditure might impact medium— and long-term climate strategies, including the associated risks from not investing in adaptation and

mitigation measures now. The 2022 Staff Guidance Note provides clear guidance for expanding analyses of trade-offs and future reports can take that advice on board.

- Moving beyond carbon taxes: The IMF's climate mitigation policy advice tends to focus primarily on carbon taxes, but this does not reflect the horizon of policy imagination for government intervention with respect to phasing out fossil fuels, including coal. The IMF could consider additional incentives—such as producer subsidies—for investors to enter the renewable energy market, or for ambitious new forms of large-scale government investment and operations in renewables.
- Systematizing the analytical framework: As IMF staff increase coverage of climate issues in their analysis, this should be integrated into a systematic framework that covers the different types of economic risk (physical, transition, and spill-over). Such analyses would be consistent with the mission of Article IV reports and deliver on the IMF's promise of expanding the coverage of its risk assessments, in terms of both policy areas and timeframes under consideration.

CASE STUDY II: SOUTH AFRICA

Economic Context

Couth Africa is an upper-middle income **2** country of 60 million inhabitants, and is Africa's third largest economy. While the country made strides to improve wellbeing and achieve stable economic growth following the end of the Apartheid regime in the early-90s, progress has stagnated since 2010. Low economic growth for over a decade has been accompanied by high levels of unemployment, at 29% in 2019. Poverty levels have tracked economic performance, with the percentage of the population below the national poverty line falling from 66.6% to 53.2% between 2005 and 2010, before trended upwards to 55.5% in 2014 where it roughly remained up until the Covid-19 pandemic (World Bank 2022b, 2022a). In 2019, the economy grew by only 0.1%, partly as a result of electricity outages associated with operational and financial difficulties at the national power utility, Eskom (News24 2019; World Bank 2020). South Africa also has one of the highest persistent inequality rates in the world, perpetuated by a legacy of exclusion and the dominance of economic activities that do not meaningfully contribute to poverty reduction, such as mining. Indeed, this sector constitutes over half of all South African merchandise exports, including platinum group metals, gold, iron ore, and coal (World Bank 2021b).

challenges facing South Africadecade-long economic stagnation, high unemployment, and vast income inequality have been exacerbated by the pandemic. African economy initially South contracted by 6.4% in 2020. In response to the ongoing health and economic carnage, the government implemented a significant Covid-19 stimulus plan in April 2020, the Economic Reconstruction and Recovery Plan, totalling almost 10% of GDP, or \$26 billion, of which about one-tenth was allocated to social assistance (Government of South Africa 2020b). The South African economy is now recovering, having reached GDP

growth of 4.9% in 2021. Growth was driven largely by high global commodity prices (especially metal), with the mining sector growing by 11.8%, and has also supported improvements in the trade balance and fiscal revenues (World Bank 2022a). However, the recovery has been jobless. There were 1.9 million less people employed at the end of 2021 compared with the quarter before the pandemic, with unemployment reaching 34.4% among the working-age population and 64.4% for youths aged between 15 and 24 (Rumble and Sidiropoulos 2022). Consequently, poverty rates have risen further since the Covid-19 crisis began. This social hardship translated into waves of civil unrest in July 2021, causing significant economic damage and adding pressure on the government to increase social support. Yet, South Africa's public finances are also besieged, as revenue increases from high commodity prices are expected to be temporary and are counterbalanced by expenditure pressures from financially distressed state-owned enterprises, social protection needs, and debt service costs the latter of which is the fastest growing spending category and representing 15% of total government spending (World Bank 2022a).

South Africa's Covid-19 stimulus plan explicitly aimed to incorporate "green economy interventions", such as energy efficient retrofits of existing building, but it also included targets to expand mining and natural gas infrastructure (Vivid Economics 2021). Furthermore, the country's 2020 Medium Term Budget included a \$641 million bailout for South African Airways unconditional on any climate measures, and another \$300 million to an unspecified energy supplier (Climate Transparency 2021). These payments piggy-back on subsidies handed out over the past decade to support the production and consumption of petroleum and coal. In 2019 alone, the government spent \$4.3 billion on fossil fuel subsidies (Climate Transparency 2021).

Table 1. Key economic indicators for South Africa

			Estimate	Projection	Projection
	2019	2020	2021	2022	2023
Economic growth / Real gross domestic product growth (%)	0.1	-6.4	4.9	2.1	1.5
Primary budget balance (% of GDP)	-1.1	-5.5	-3.9	-2.6	-1.8
Foreign exchange reserves (months of imports)	8.4	6.6	5.9	5.6	5.2
Public debt (% of GDP)	56.3	69.4	69.9	74.5	77.7

Sources: World Bank (2022a) and IMF (2022d)

South Africa's economy is one of the most coal-dependent in the world. The coal mining sector employs over 90,000 workers, concentrated in regions with high unemployment levels, and millions more are connected to the coal value chain, such as transport, electricity generation, and petro-chemical production (Rumble and Sidiropoulos 2022). This renders the achievement of a just transition to a lowcarbon future especially difficult—though there are few viable alternatives with South Africa expected to lose \$84 billion by 2035 from falling prices and demand as a result of other countries' transitions to a low-carbon economy (Huxham, Anwar, and Nelson 2019). Investments by Eskom and other carbon-intensive sectors of the economy will also become exposed to asset stranding, with significant flow-on effects for the broader economy (Burton et al. 2016).

Climate Mitigation

South Africa has developed a series of institutional arrangements to mitigate greenhouse gas emissions, including the Green Transport Strategy of 2018, the Integrated Resource Plan of 2019, and the Carbon Tax Act of 2019 (Government of South Africa 2018a, 2019b, 2019a). The government initially described its plans for a long-term transition to a climate resilient and lower carbon economy in its 2004 National Climate Change Response Strategy and then in its 2011 National Climate Change

Response Policy (Government of South Africa 2004, 2011). In the 2016 Intended Nationally Determined Contribution submitted in compliance with the reporting requirements of the Paris Agreement (Government of South Africa 2016), the government presaged its target by highlighting the significant rigidity of its economy given the historical development pathway of its energy sector, as well as an "overriding priority to address poverty and inequality". It defined its mitigation target according to a peak, plateau, and decline trajectory. Accordingly, emissions will peak between 2020 and 2025, plateau for a decade, then decline in absolute terms, ranging between 398 and 614 metric tons of carbon dioxide equivalent between 2025 and 2030. The First Nationally Determined Contribution, submitted in 2021, moderately increased its ambition, committing to a range of 398 to 510 metric tons of carbon equivalent by 2025 and 350 to 420 by 2030, which represented a 32% reduction in the upper end of the target range in 2030 and 12% reduction in the lower range (Government of South Africa 2021). The Climate Change Bill, which has been under consideration by both houses of Parliament since 2018, is planned to be finalised in 2022, and as framework legislation, will provide a legal basis for further action.

A key area where the country intends to make progress is in the electricity sector through

its Renewable Energy Independent Power Producer Procurement Programme (REI4P) which, as of March 2020, had approved 112 renewable energy projects, attracted \$13 billion in investments (of which 80% was domestic and 20% foreign), and created 51,000 job-years (Government of South Africa 2021). However, the government notes that further shifts away from coal will require international support in the form of transition finance and associated technology and capacity-building. In March 2021, a subsequent round of renewable energy procurement under the REI4P was announced and the license threshold for embedded generation projects was increased onehundred-fold (from 1MW to 100MW) in order to attract more investment for wind and solar project (Climate Transparency 2021). On the surface, the recently implemented carbon tax also represents an ambitious attempt to reduce greenhouse gas emissions. The tax covers the sources of approximately 80% of domestic emissions—including all types of fossil fuels across industry, power, buildings, transport sectors—and and charges at about \$9 per ton of carbon dioxide equivalent. However, present allowances and exemptions reduce the effective tax rate by between 60% and 95% (Climate Transparency 2021).

put these ambitions in context, То South Africa contributed 1.1% of global greenhouse gas emissions in 2019 (the latest year with available data), making the country the seventeenth largest emitter in the world (World Resources Institute 2022). These emissions were dominated by energy at 84.9%, followed by agriculture (5.1%), waste (4.5%), industrial processes (4.3%), and land-use change and forestry (1.2%). As shown in Figure 1, about 91% of South Africa's energy needs are currently being met by fossil fuels, primarily from coal (72%) and oil (16%) (IEA 2022). The contribution of coal to the energy mix grew from 74% in 1990 and peaked at around 78% in 2005, before slowly declining. Despite this, the overall share of fossil fuels in the total energy

supply has kept growing over the last three decades, from 86% in 1990 to 91% in 2019. Non-fossil fuel energy sources include 6% from biofuels and waste (which has declined significantly from its 12% share in 1990), 2% from nuclear, and 1% from wind and solar. In total, the share of renewable energy (which excludes nuclear and some biofuels) has only reached 5% (Climate Transparency 2021).

Coal is the mainstay of the South African power sector, accounting for more than half of the country's coal consumption (USAID 2016). In 2020, South Africa produced 87% of its electricity from coal, thus ranking first in the world in terms of the share of coal in electricity generation (World Resources Institute 2022). The remaining power generation came from nuclear, at 5%, and renewables, at 8% (Climate Transparency 2021). Yet, even this picture is rosy, as the renewables estimate includes 2.5% from pumped hydropower used for storage, which is typically charged by coalfired power plants. The 2019 Integrated Resource Plan set a long-term diversification of the power mix that would lighten the carbon footprint of the energy sector, in which renewable energy sources are expected to account for about 36% of installed capacity by 2030 (Government of South Africa 2019b). But the affordability of a diversified electricity supply to lower income groups represents a potential constraint (IEA 2022). Moreover, although the plan proposes a 400% expansion of renewable energy capacity and decommissioning of some older power plants by 2030, it also includes procurement of new coal capacity. Meanwhile, the near-monopoly national power utility, Eskom, faces persistent criticism for its outdated and poorly maintained coal power plants, which have lead to economically debilitating rolling-blackouts known locally as 'loadshedding'—since 2008 that continue to the present as it struggles to keep pace with growing demand (Cohen and Burkhardt 2022). Indeed, outages hit record levels in 2022, with the country experiencing 87 days of power cuts as of early-August (Siwele 2022).

Climate Adaptation

South Africa ranks 96th of 182 countries in the ND-GAIN index, which measures exposure, sensitivity, and ability to adapt to the impact of climate change (Notre Dame Global Adaptation Initiative 2021). The country is especially vulnerable to the impact of climate change due to its high dependence on rain-fed agriculture and natural resources, high levels of poverty—particularly in rural areas—and low adaptive capacity (World Bank 2021a). South Africa has observed, and is projected further trends of, temperature increases, rainfall variation, rising sea levels, and an increasing frequency of extreme weather events like droughts, floods, and wildfires—which already cost \$160 million a year in damages (World Bank 2021a). The hotter and drier climate will exacerbate soil erosion, desertification, and land degradation, and has also placed significant stress on urban water services in many South African cities (Climate Transparency 2021). In this context, food and water insecurity represent particular challenges (Government of South Africa 2016). South Africa is located within a 'drought belt' and is the fifth most water scarce country in sub-Saharan Africa, with approximately 50% of the country classified as arid or semi-arid. Changing precipitation patterns in such areas could expose these communities to crop failures and reduce the productivity of rangelands. For instance, the agricultural sectordominated by maize cultivation—represents a critical component of the South African economy, employing more than 860,000 people and contributing significantly to food security and export revenues (World Bank 2021a). Climate change will have adverse effects on cereal production, high-value export agricultural production, and animal husbandry (although sugarcane may be positively impacted unless gains are offset by greater pest diversity).

South Africa's National Climate Change Adaptation Strategy of 2020 serves as the country's overarching policy instrument in which adaptation objectives are articulated across all sectors of the economy (Government of South Africa 2020a). It builds on principles included in the National Climate Change Response Policy (Government of South Africa 2011), National Development Plan (Government of South

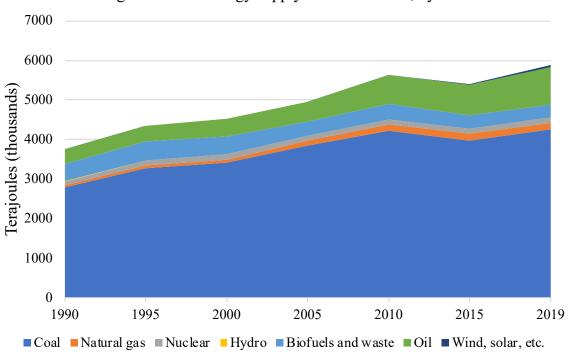


Figure 1. Total energy supply in South Africa, by source

Africa 2012), as well as sectoral adaptation and provincial and municipal adaptation strategies; and will be given a legislative basis once the Climate Change Bill comes into fruition, expected later in 2022. Reflecting these policies, the country's Determined Contribution Nationally prioritises key adaptation efforts in water (e.g., enhanced water security), agriculture (e.g., climate-smart agriculture), health (e.g., early warning systems for climate-induced biodiversity (e.g., monitoring disease), of climate change impacts), and human settlements (e.g., urban planning that incorporates climate risk) (Government of South Africa 2021). The projected costs of adaptation interventions required for the implementation of the adaptation strategy for the period 2021 to 2030 are \$4 billion, while overall adaptation needs are costed at between \$16 and \$267 billion by 2030 (Government of South Africa 2021). Upon reflection of the costs, the South African government noted that 89% of the \$2.4 billion per year previously provided in climate was in the form of loans rather than grants, and the overwhelming majority of this pot was provided for mitigation projects rather than for adaptation. They subsequently aim to achieve at least \$8 billion per year in climate financing by 2030, with resources to be equally distributed between adaptation and mitigation.

Because the poor are more exposed to climate risks and have fewer resources with which to adapt, they are more vulnerable to climate change. South Africa is no exception to this rule. Although South Africa is an upper-middle income country, it ranks as the most unequal country in the world, with a Gini coefficient of 63.0, and still faces extremely high levels of poverty, at 55.5% of the population based on the national poverty line (World Bank 2022b). South Africa's informal settlements are particularly susceptible to the effects of climate change. A growing number of the country's cities and towns will be exposed to weather-induced hazards, disproportionately affecting the

urban poor, who are more vulnerable due inadequate construction materials, potentially hazardous locales (e.g., floodprone areas), combined with a lack of income to invest in adaptation measures. Small-scale rural farmers will also be more sensitive to the impacts of climate change, since they too have limited resources with which to influence and increase adaptive capacity (World Bank 2021a). Overall, climate change is expected to severely hamper economy growth, job creation, and inequality (Government of South Africa 2018b).

IMF Surveillance and Recommendations

To what extent is the policy advice in IMF bilateral surveillance consistent with enabling South Africa to transition away from dependence on fossil fuels, including coal? Does such advice adequately address transition risks resulting from the country's fossil fuel dependence? And is such advice aligned with a just transition that safeguards the rights and needs of the poorest in society? We examine these questions based on analysis of the most recent staff report for the Article IV consultation and background documentation (IMF 2022d, 2022e, 2022f), focusing on key climate-related policy areas.

Fiscal policy

IMF advice on fiscal policy has the potential to impact South Africa's progress on achieving climate commitments and addressing transition risks. Government expenditures surged due to Covid-19related challenges, and the budget deficit widened significantly as a result, reaching 5.5% of GDP in 2020. While the deficit then narrowed to 3.9% of GDP in 2021, this was on the back of stronger-than-expected revenue performance linked to rises in global commodity prices—as much of South Africa's exports are in carbon-intensive sectors like metals, coal, and other minerals—and is unlikely to be sustained (IMF 2022d, 10). The IMF thus endorses expenditure cuts described in the government's medium-term budget policy statement to reduce the fiscal deficit to -1.8% of GDP by 2023 in order to contain public debt--expected to rise to 77.7% of GDP by 2023—as the government had been borrowing to maintain the deficit. As has become a platitude in IMF advice, such consolidation effort is to coincide with "protecting well-targeted social spending and investment" (IMF 2022d, 16).

Concrete fiscal consolidation measures proposed to reign-in public debt include containing public sector compensation, streamlining tax expenditures, targeting of education subsidies, rationalizing transfers to SOEs. Each of these measures has the potential to impact on a green and just transition, but are not recognized as such by the IMF. First, IMF staff advised below-inflation cost-of-living adjustments, reform of allowance and pay progression, and the introduction of an "evidence-based approach to pay-setting" in order to achieve cost savings of 2% of GDP in the public sector (IMF 2022d, 16). This advice is premised on the fact that South Africa's government wage bill is among the highest in emerging markets, at about 13.9% of GDP, and is driven by high average compensation levels rather than high headcount levels of government employment; the public sector also has a considerable wage premium over the private sector (IMF 2022d, 84). However, public sector wage reductions are typically tracked by the private sector where South Africa's more vulnerable workers are employed (Kerr and Wittenberg 2017), both because of the diminished power of labour in wage bargaining and because of dwindling demand for low-wage services by middleclass civil servants as disposable incomes decline. In turn, income reductions decrease the ability of households—especially poorer ones—to adapt to climate risks.

Second, the IMF advised that spending cuts of 1% of GDP could come from "expenditure efficiency and limiting tertiary education subsidies to only vulnerable households [and that] the government should exercise

caution with its social assistance program, by fully offsetting any increases with credible cuts in other budget areas" (IMF 2022d, 16). Appropriately identifying the groups to be targeted by tertiary education subsidies entails difficult and expensive administrative tasks; and comparative experience has shown that bureaucratic attempts targeting tend to lead to the exclusion of many credible potential beneficiaries due to excessively stringent eligibility criteria or administrative hurdles (Mkandawire 2005) this is especially likely to be the case in a context where unemployment has reached 64.4% of the youth population. In relation to climate risk, subsidized tertiary education provision frees up resources to households to adapt to the consequences of climate change, and to support workers displaced by the decarbonization transition via reskilling and upskilling. There are also clear breaches of achieving a just transition in this regard. As the IMF itself recognizes in an appendix to the Article IV report, "High education spending reflects the government's objective of making up for the injustices of the past. The 1994 post-apartheid Reconstruction and Development Program set education as a leading pillar to a new and equitable South Africa" (IMF 2022d, 94). In addition, the wisdom behind offsetting any increase to the social assistance spending—currently at 3% of GDP and comprising social pensions and targeted cash transfers (IMF 2022d, 49)—must also be questioned. With one million jobs at risk connected to the coal value chain (IMF 2022f, 38), joblessness may well increase if employment in renewable energy schemes do not materialize or are significantly mismatched in terms of job location, quality, and qualification needs (Burton, Marquard, and McCall 2019), leaving households without resources to adapt to climate change.

Third, among revenue measures, the IMF recommends removing tax exemptions related to selected sectors and special economic zones—which includes several carbon-intensive sectors such as car

manufacturing—and increasing carbon and excise tax rates in order to facilitate consolidation. The IMF notes that these "would also help reduce emissions to meet international commitments" (IMF 2022d, 16). While such measures are indeed beneficial to achieving decarbonisation objectives by disincentivizing carbon-intensive economic activity, the IMF's emphasis on the green credentials of the reforms misrepresents the motivations behind them—in what has elsewhere been referred to as a retrofitting of fiscal consolidation measures as climate policy (Stubbs and Kentikelenis 2022).

Fourth, the IMF estimates savings of 1.5% of GDP by limiting state-owned enterprise operating costs so that subsidies and other transfers from the National Treasury could be reduced, including from adjustments to Eskom (described further below).

More generally, the Article IV report provided insufficient recognition of long-term risk to public finances due to the ongoing low-carbon transition, both domestically and abroad. Indeed, the IMF's recognition of the temporary nature of favourable commodity prices is not informed by lowcarbon transition factors, but by the unique impact of the pandemic on metals and other mineral exports (e.g., Stuemer and Valckx 2021). This represents a glaring omission especially so given that the IMF explicitly recognizes that subpar South Africa's economic performance over the last decade is the result of economic policies failing to adapt to the end of the commodity price boom of the 2000s, significantly eroding standards and macroeconomic fundamentals (IMF 2022d, 4). The impending drop in demand, and thus prices, for carbonintensive commodities as South Africa's trade partners commit to decarbonization including Eskom's international power sales among Southern African neighbours as well as major coal importers India and Pakistan (Nicholas 2019, 2021)—thus represents a level of urgency that warrants embedding in all projections and assessments of fiscal risk.

Finally, the IMF does not evaluate the extent to which fiscal consolidation may impede the ability of the government to scale-up public investment to fulfil the climate adaptation and mitigation programs described in its Nationally Determined Contribution.

Energy sector policy

The IMF notes that restructuring the national electricity company, Eskom, is critical to ensure energy security, reduce fiscal risks, and transition away from coal powered energy. As an aside, it is worth remembering that Eskom has received extensive historic support from the IMF's sibling institution, the World Bank, in order to become a major energy player in the country. Although there was limited engagement on energy sector policy in the Article IV report itself, the IMF directly considered it in a chapter of the background documentation (IMF 2022f, 31-39). There, an IMF staff member from the African Department described how structural reforms to the power sector can support the climate ambitions of South Africa. While such documentation is intended to accompany the main Article IV report and is considered during discussions at the IMF's Executive Board, better integration of these considerations into the main report could further increase the prominence of climate change issues for the broader audiences of Article IV reports.

The IMF explained that reform efforts to reduce rigidities in the economy are key to accelerate decarbonization of the power sector and transition away from coal. They focused their attention on Eskom in particular, which relies heavily on government transfers to continue with an "outdated business model, which favours large-scale projects in coal and nuclear, and supports the mining value chain" (IMF 2022f, 37). The IMF notes that Eskom has actively resisted new entrants into the sector by delaying the expansion of independent power producer programs that would allow for the growth of renewables; and in 2017, Eskom publicly resisted providing transmission facilities to renewable projects, with the government intervening on the regulatory front to help protect demand for Eskom's electricity by delaying permits for businesses with their own generation capabilities (Makgetla 2017). To address this, the IMF recommends efforts to "improve Eskom's efficiency [to] help guard investment in the grid infrastructure, which is needed to integrate renewable energy sources," as this has become a constraint to further lowering the cost of renewable energy procurement (IMF 2022f, 37).

These events may well inform the IMF's more general calls for "a streamlined and transparent regulatory environment encourages competition that entrepreneurship" throughout the economy (IMF 2022d, 21). Although deregulation has historically resulted in an upsurge of pollutive actions by energy sectors elsewhere (Neves, Marques, and Patrício 2020; Samet and Burke 2020), in the South African context the IMF's advice seems prudent if renewable energy is to blossom. As the IMF sniped in its assessment of Eskom: "The greatest obstacle to the transformation of the energy sector has been insufficient reform efforts rather than lack of financing. ... Access to green finance is available to South Africa as long as the country can demonstrate a commitment to private sector-led renewable energy production and a full operational overhaul of Eskom-both focused on transforming the country's energy sector. Otherwise, meeting the financing demands of Eskom could be perceived as providing it with resources to maintain its current unsustainable and inefficient operations, and could in fact reduce incentives for green investment and financing by the private sector" (IMF 2022f, 37). Nonetheless, the IMF fall short of recommending additional incentives for investors to enter the renewable energy market or for new forms (i.e., distinct from Eskom) of large-scale government investment in renewables, which may be a missed opportunity. There are also fears among civil society groups that the Eskom

restructuring is an initial step towards its privatization under the guise of improving efficiency. Consequently, several groups are calling for a 'New Eskom' that generates its own renewable energy (350 Africa 2022; Eskom Research Reference Group 2020).

While advice to abolish regulatory constraints to expand access to new players may be sensible in relation to the energy sector, the implications of the same advice applied to the mining sector are less certain. The IMF identifies a need to expedite the authorization process to accelerate significant investments by several mining companies to generate their own electricity, and to reduce regulatory hurdles and tackle a backlog of mining licensing applications to attract investment in the mining sector (IMF 2022d, 22). The promotion of mining sector investment is clearly counter to a green transition and, as a carbon-intensive activity, there is imminent risk that such investments will become stranded assets. Moreover, if mining company electricity generation is based on fossil fuels, then such advice may further entrench fossil fuel dependence.

Climate risk and green transition

If IMF surveillance is to facilitate green transition and just recovery priorities, it will need to consider the physical risks of climate change and transition risks associated with a low-carbon future. In the Article IV report, a section titled "contributing to a green and digital transition" expended three paragraphs to describe potential climate risks, one of which was a summary of the domestic authorities' views (IMF 2022d, 24). In the initial paragraph, the IMF recognizes that "South Africa's climate challenges include both the likely increase in the frequency and severity of extreme weather events and the high carbon-intensity of the economy due to its dependence on coal, particularly in the energy sector." It then notes that a stable macroeconomic environment and coherent set of actions to encourage private-sector participation and develop green finance will help build a climate-resilient economy. In the

subsequent paragraph, the IMF states that "the achievement of decarbonization while ensuring a just transition hinges crucially on more dynamic product and labor markets." Reforms to product markets are described above in relation to mining and energy. With regard to labor reforms, the IMF's advice favours greater labor market flexibility to support greater private sector participation in the economy—ultimately a political position in favour of market-based solutions which may not necessarily be economically optimal (Freeman 2005). Their rationale is based on supply-side economics, which posits that firms invest more when labour markets are flexible and when the costs associated with labour protections are low. The IMF explains that South Africa has a relatively high trade union density and relatively centralized bargaining system with "insufficient" representativeness of employers, and that this prevents the delivery of high and stable employment (IMF 2022d, 91-92). Accordingly, it calls for firmlevel flexibility in the collective bargaining system, a streamlining of employment protection legislation, and the introduction of sub-minimum wages for certain categories of workers (e.g., the youth) (IMF 2022d, 92-93). Such measures are known to reduce wages and curtail the right to decent working conditions, as well as having pernicious effects on health and inequality (Forster et al. 2019, 2020). They are certainly not in the spirit of a just transition.

In the background documentation, the IMF provided greater coverage of physical climate and transition risks faced by South Africa. In particular, the IMF demonstrated substantive engagement with the ways in which the pandemic made climate adaptation and decarbonization transition more challenging (IMF 2022f, 33–35). The analysis focused on three key areas: public finance constraints, labor market characteristics, and trade-offs of the Covid-19 stimulus plan. First, the IMF highlighted that the room for active government support of climate adaptation and decarbonisation transition had been constrained both by growing public debt

and because many state-owned enterprises are highly exposed to carbon-intensive activities (e.g., coal-fired power plants, rail, and port infrastructure), which makes them vulnerable to a drop in demand from the decarbonization transition, with potential significant fiscal implications. Second, the IMF explained how the jobless pandemic recovery will mean that the migration of low-skilled workers out of the coal value chain will be even more challenging, and that deficiencies in the country's education system further complicate the necessary transition. workforce Third. the described how measures in the country's' Economic Recovery and Reconstruction Plan were often incompatible with a low-carbon economic rebound, such as a published list of preferred bidders under the Risk Mitigation Independent Power Procurement Program showing that most of the 2 GW of energy procured uses carbon-intensive gas technology. Later in the document (IMF 2022f, 38-39), the IMF promoted measures to improve the quality of education, apprenticeships, and vocational training schemes to support displaced workers, and to design policies that could bridge the spatial divide between workers' living areas and places where new jobs are created, such as geographical mobility subsidies although such advice stands in contradiction to the cuts in education subsidies envisaged in the main Article IV report.

In additional background documentation, the IMF provided a report based on its Financial Sector Assessment Program (FSAP), which aims to identify financial sector vulnerabilities as well as opportunities for the sector to contribute to broader development objectives (IMF 2022e). The FSAP report contained extensive engagement with climate issues, as it was recognized that the financial system faced significant physical risks related to natural disasters, as well as transition risks related to coal-based energy generation. The IMF team conducted an in-depth climate change risk analysis which found that banks already assign significantly higher probabilities of default to sectors more vulnerable to water shortages. They also conducted stress tests based on two scenarios: one focusing on a technological transition to green energy which estimates the incremental increase in expected default frequency and defaulted debt from permanently higher electricity prices; and another estimating the increase in production costs resulting from a carbon tax increase, absent any pass-through to end users. Their results suggested that a shift away from coalbased energy production could contribute to sustained price hikes that could increase credit risks (IMF 2022e, 20). Overall, the FSAP yielded 22 key recommendations, four of which had explicit green credentials: in relation to vulnerability analysis, to "Further strengthen analytical tools, including for solvency and liquidity stress tests and climate risk analysis, and incorporate results in risk-based supervision"; in financial sector oversight, to "Improve climate risk oversight"; and in green finance, "Finalize the taxonomy of 'green' economic activities and start monitoring flows", and "Finalize guidelines on climate-related financial disclosures" (IMF 2022d, 89).

While transition risks resulting from the country's fossil fuel dependence addressed in background documentation, excluding it from the main Article IV report risks compartmentalizing climate issues rather than mainstreaming it into the general analysis. This fallacy is evidenct on several occasions where there were obvious omissions of climate-related considerations. First, the section on outlook and risks had no coverage of climate risks, despite covering medium-term performance and areas that climate change and low-carbon domestic and spill-over transition risks plausibly apply—such as the current account, economic growth, fiscal deficit, and public debt (IMF 2022d, 12-14). Key downside risks instead included prospective Covid-19 waves and travel restrictions, a drop in commodity prices, tightening of external

financing conditions, delays or reversals in reform implementation, and social instability. Second, an opportunity to quantify benefits and drawbacks of policy measures vis-à-vis the environment was missed in the debt sustainability analysis. While six standardized stress tests (primary balance shock, real interest rate shock, real GDP growth shock, real exchange shock, contingent liability shock, and combined shock) were simulated, climate-related stress tests were not, thereby failing to quantify benefits of environmental policy measures vis-à-vis the country's debt profile. (IMF 2022d, 74-83). Finally, the risk assessment matrix failed to record natural disasters related to climate change or South Africa's decarbonization transition domestic sources of risk, or global spill-over transition risks linked to the South African economy's external dependence on fossil fuels (IMF 2022d, 72-73).

Conclusion

The IMF's bilateral surveillance on South Africa offers a mixed picture in relation to green transition goals. Advice pertaining to energy sector policy was compatible with the country's objective of phasing out fossil fuels, including coal-where the IMF recommended restructuring of Eskom and deregulating the power sector to promote accelerated entry of renewables. Transition risks resulting from the country's fossil fuel dependence were also considered in background documentation, especially in relation to the financial sector, even if more effort could have been expended to mainstream these considerations into headline analyses. However, the IMF's fiscal consolidation plans, such as the containment of public sector compensation and better targeting of education subsidies, fell short of the ambitions set out in South Africa's NDC in relation to adaptation objectives and a just transition, thereby revealing that there is still some way to go for the organization in fully incorporating green transition objectives in its surveillance missions.

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