

# Submission to *Climate Action Plan 2024*

Feminist Communities for Climate Justice

April 2024

This submission has been prepared by *Feminist Communities for Climate Justice*, a joint project between the National Women's Council of Ireland and Community Work Ireland.

### **National Women's Council**

The National Women's Council of Ireland (NWC) are the leading national representative organisation for women and women's groups in Ireland, founded in 1973. With nearly 200 members, the ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. NWC's current Strategic Plan *No Woman Left Behind* prioritises the need for NWC to bring a new focus on the climate crisis, its impact on women, the need for a Just Transition and the need for women and women's organisations to play a more central role in development of policies and solutions to meet the challenge of our climate crisis.

### **Community Work Ireland**

Established in 1981 as the Community Workers Co-operative, Community Work Ireland (CWI) is a national organisation that promotes and supports community work as a means of addressing poverty, social exclusion and inequality and promoting human rights. CWI has a membership base of almost 900 community workers and community work organisations working with the most marginalised communities throughout the country. CWI has been involved in the area of climate justice since 2010.

### **Feminist Communities for Climate Justice**

*Feminist Communities for Climate Justice* campaigns for climate justice that reflects feminist and community work values. We mobilise communities, ensuring social inclusion and equality are central to climate policies and programmes. This partnership between the National Women's Council (NWC) and Community Work Ireland (CWI) amplifies the voices of women and marginalised communities that are most impacted by climate change, building momentum in communities to engage, understand and influence climate policies. *Feminist Communities for Climate Justice* will develop a feminist and community work analysis, is delivering an accredited training programme in partnership with the Department of Applied Social Studies at Maynooth University, has established a Feminist Communities for Climate Justice National Network, and will develop resources and campaigns around feminist climate justice.



## Climate Action Plan 2024

*Climate Action Plan 2024* must create actions which acknowledge and address the domestic impacts of the climate crisis for marginalised groups in Ireland such as women and girls, Travellers, people seeking refuge and or asylum, disabled people, older people and more. Adaptation and mitigation policy responses from Government must also be assessed for their impacts on the aforementioned groups. Gathering of gender disaggregated data surrounding climate issues is essential to make evidence-based policy responses in this area, as well as recognition of the role of care and care work in gendered experiences of the climate crisis. Work on centring well-being rather than Gross Domestic Product (GDP) and growth within the Irish economy and policy should be scaled up to benefit people and the planet.

### Gender & Climate Change

While climate change is a threat to all life on the planet, the evidence is now clear that disadvantaged and marginalised communities and groups will continue to disproportionately bear the greater challenges, including the adaptation and mitigation strategies proposed by Government. They are also the least likely to be able to take advantage of strategies to ensure a just transition as these continue to benefit the more affluent. The Paris Agreement, Sustainable Development Goals (SDGs)<sup>1</sup> and the United Nations Framework Convention on Climate Change (UNFCCC)<sup>2</sup> recognise that women and girls in particular face impacts to their livelihoods and that the climate crisis will interact with already existing gender inequalities, potentially exacerbating them.

Women's socioeconomic disadvantage compared to men, in addition to cultural attitudes that create disadvantages and barriers to their full participation in social, cultural and economic life creates a uniquely gendered interaction to environmental degradation that has been well-researched<sup>3</sup>. Policy responses to the climate crisis created by governments that do not pay attention to existing gender inequality or utilise gender proofing policy tools risk implementing changes that will worsen gender equality. This needs to be taken into account in climate policymaking, including within the actions of *Climate Action Plan 2024* – gender proofing makes policy more robust and is key to ensuring that gender inequality is not inadvertently exacerbated.

It is positive to see the attention paid to this gendered impact in *Climate Action Plan 2024* in Chapter 10, *International Climate Action*. However, discussion on gender within the plan is only in

---

<sup>1</sup> *Climate Action Plan 2024*, p. 6

<sup>2</sup> [UNFCCC – Introduction to Gender and Climate Change](#)

<sup>3</sup> [Global Gender and Climate Alliance – Gender and Climate Change: A Closer Look at Existing Evidence](#)



relation to international impacts – the plan entirely omits the domestic impacts that the climate crisis will have on women and girls in Ireland. Areas such as energy use and transport, key to our net-zero transition, have gendered uses which will have implications for future policy work – particularly when considering our legally binding carbon emission reduction targets. Multiple policy areas will ultimately be impacted by the climate crisis with resulting gendered disadvantages for women, such as health – particularly reproductive health – land use, food production and agriculture.

In order to fully gender proof Ireland’s climate future, *Climate Action Plan 2024* must acknowledge the domestic impacts of the climate crisis for women and girls. The transition to net-zero by 2050 must take concerns of gender inequality seriously for women and girls to enjoy our future green economy on equal footing with men and boys. To achieve this, the following actions are recommended:

- 1. Collect more gender disaggregated data on transition priority areas**
- 2. Recognise care as low-carbon and green work within Just Transition strategy and actions, including actions to support care work and the care sector of the economy**
- 3. Proof actions within *Climate Action Plan 2024* for their impact on women and marginalised communities**
- 4. Ensure that women and marginalised communities are meaningfully included and represented within the pending Just Transition Commission**
- 5. Develop targeted interventions for marginalised communities to ensure that members of those communities are not further disadvantaged by transition actions.**
- 6. Move beyond targeted social welfare payments and energy credits as a means of addressing economic inequality risks posed by increasing carbon taxation**
- 7. Commit to the development of a post-growth and care-centred economy, building on work already carried out through the *Beyond GDP – Quality of Life Assessment and The Well-being Framework***

### **Collect more gender disaggregated data on transition priority areas**

Although some valuable data exists, such as the [Travelling in a Woman’s Shoes report commissioned by Transport Infrastructure Ireland \(TII\)](#), far more domestic gender disaggregated data is required to create evidence-based, gender proofed climate policy decisions. Research has shown that women are more vulnerable to energy poverty than men<sup>4</sup>; use transport in different ways than men<sup>5</sup>; and are more likely to engage in sustainable and environmentally beneficial behaviours

---

<sup>4</sup> [EmpowerMed – Gender & Energy Poverty: Facts and Arguments](#)

<sup>5</sup> Sánchez de Madariaga, I. (2013). The mobility of care. Introducing new concepts in urban transport. Fair shared cities. The impact of gender planning in Europe., 33-48.



than men<sup>6</sup>. The current homogenous non-gender proofed approach to climate adaptation and mitigation policy decisions in Ireland to date means that climate policy does not contribute to the elimination of gender inequality and poverty – and a lack of attention to gender exacerbates these existing inequalities instead.

*Climate Action Plan 2024* must commit to:

- Collection of gender disaggregated data on a number of relevant areas, including energy poverty; use of public, private and active transport, inclusive of affective and experiential knowledge; utilisation of retrofitting schemes; annual spending on transport related purchases; and dwelling condition.
- Gender proofing of all actions within *Climate Action Plan 2024*
- Implementation of existing good quality gender disaggregated data, such as TII's *Travelling in a Woman's Shoes* report, into relevant action areas.

### **Recognise care as low-carbon and green work within Just Transition strategy and actions**

Care work is essential work, a trait that was emphasised for Government and the public during the outbreak of the COVID-19 pandemic. Critical to the social and economic infrastructure of our societies, care work encompasses a wide range of activities and takes place both within the formal care sector and informally within the home – including care of children; care of those with illness; care of older people; and supports for disabled people to live well and live independently. Indeed, care work also means care for nature and the environment.

In its recently published [Ireland's Climate Change Assessment \(ICCA\) Synthesis Report](#), the [Environmental Protection Agency \(EPA\)](#) noted that equity and wellbeing should be prioritised in climate policy in order to support the transformative change required for the low-carbon transition in Ireland. Value of care is specifically noted by the EPA, but care and caring work are entirely absent in any meaningful way from *Climate Action Plan 2024*. This is despite the fact that caring work requires little to no extraction of natural resources to carry out; produces 26 times less greenhouse gases (GHGs) than jobs in manufacturing and over 200 times less than agricultural jobs<sup>7</sup>; and is essential to all life. Care work is also central to the gendered experience of climate change for women and girls. The incorporation of care work in green jobs discourse, including *Climate Action Plan 2024's* Just Transition strategy and actions, would allow this work to be

---

<sup>6</sup> [What Is The Eco Gender Gap and How Can We Bridge It?](#)

<sup>7</sup> [Women's Budget Group – A Green and Caring Economy: Final Report](#)



recognised and valued for its inherently low-carbon nature and bring a greater representation of women to current Just Transition strategy.

*Climate Action Plan 2024* must commit to:

- Implementation of EPA ICCA Synthesis Report recommendation E.4 surrounding the prioritisation of equity and wellbeing in its actions
- Meaningful inclusion of care work in Just Transition chapter, with detailed actions and strategy

### **Proof actions within *Climate Action Plan 2024* for their impact on women and marginalised communities**

Noted within *Climate Action Plan 2024* is a striking input received from stakeholders through the National Dialogue on Climate Action (NDCA) – that, “a key measure of success for climate transformation being the extent to which the most vulnerable communities can be protected and thrive.”<sup>8</sup> Public consultation mechanisms like Climate Conversations have also resulted in the first mention of the Traveller community in any Climate Action Plan to date within *Climate Action Plan 2024*<sup>9</sup>, showing that there is public appetite for climate actions to ensure equality for marginalised communities, which echoes the aforementioned recommendation from the EPA ICCA Synthesis Report. Groups already marginalised face barriers to participating in the green transition and a potential exacerbation of their existing marginalisation if their needs are not taken into consideration in all climate actions – *Climate Action Plan 2024* should be assessed for potential equality impacts.

*Climate Action Plan 2024* must commit to:

- Collection of relevant data, including data correlating environmental degradation with material deprivation or membership of a marginalised community.
- Poverty proofing of all actions within *Climate Action Plan 2024*.
- Incorporating relevant policy assessment tools within *Climate Action Plan 2024*'s actions for their impact on marginalised communities
- Amend Principle 3 of *Climate Action Plan 2024*'s Just Transition Framework, ‘*The costs are shared so that the impact is equitable and existing inequalities are not exacerbated*’ to reflect input received from NDCA and Climate Conversations, including new concrete actions to display ambition in adhering to this principle

---

<sup>8</sup> Climate Action Plan 2024, p. 81

<sup>9</sup> p. 82

## **Ensure that women and marginalised communities are meaningfully included and represented within the pending Just Transition Commission**

Establishment of the Just Transition Commission must be a priority action for *Climate Action Plan 2024* to secure a Just Transition for both place-based and identity-based communities that face barriers and challenges during the green transition. The makeup of the commission must reflect and include the communities that face the most challenges, and this must include representation of the needs of women and girls in all of their diversity.

*Climate Action Plan 2024* must commit to:

- The establishment of the Just Transition Commission
- Ensuring that the membership of the Just Transition Commission is reflective of both the place-based and identity-based communities that face additional challenges in the green transition through capturing data to identify such communities
- A 50:50 gender ratio reflected in the Just Transition Commission's membership as a priority action

## **Develop targeted interventions for marginalised communities to ensure that members of those communities are not further disadvantaged by transition actions.**

*Climate Action Plan 2024* does good work of noting that certain areas of Ireland such as the Midlands will be particularly impacted by the green transition, and that Just Transition strategy should prioritise these areas. Inputs received through Climate Conversations have noted that communities that are not place-based should also be prioritised for Just Transition strategies and communications, such as “Travellers, older people, and less able members of society”<sup>10</sup>. *Climate Action Plan 2024* does note that ‘particularly impacted groups’ will require targeted supports alongside regions and communities in the transition<sup>11</sup> – developing more concrete actions to support identity-based marginalised groups, including outright naming these groups within *Climate Action Plan 2024*, should be a priority action in order to best realise Principle 3 of the Just Transition framework.

*Climate Action Plan 2024* must commit to:

- Redeveloping existing Just Transition strategy and actions to incorporate the needs of vulnerable identity-based communities as well as place-based communities. The thoughtful

---

<sup>10</sup> p. 82

<sup>11</sup> p. 73

contributions of marginalised stakeholder groups through Climate Conversations should be incorporated into the redevelopment process

- The development of a robust evidence base regarding the needs of vulnerable identity-based communities in order to create strong evidence-based actions

### **Move beyond targeted social welfare payments and energy credits as a means of addressing economic inequality risks posed by increasing carbon taxation**

*Climate Action Plan 2024* recognises that certain climate policy tools like carbon taxation, if not implemented progressively, risk creating economic inequality or exacerbating existing fuel poverty amongst the population<sup>12</sup>. ‘Targeted increases in social welfare,’ are listed as one of the initiatives to address the risk of household fuel poverty, and a variation of this initiative has been realised in the past two government Budgets through the provision of energy credits for households. However, such initiatives cannot meaningfully address key issues such as the cost of energy and the energy efficiency of homes, both of which are key determinants of households experiencing energy poverty; research has also linked identity-based disadvantage such as gender<sup>13</sup> or membership of the Traveller community<sup>14</sup> to a higher risk of experiencing energy poverty.

Additionally, such measures do not adequately address the increasing cost of petrol and diesel created by carbon taxation for individuals driving Internal Combustion Engine Vehicles (ICEV). Certain communities, such as those living in rural areas<sup>15</sup>, disabled people and women<sup>16</sup> are more reliant on driving private vehicles due to poor public transport links or specific transport needs that are not adequately met by existing public transport infrastructure. This issue becomes more urgent in the face of plans to implement carbon-emissions based vehicle registration taxes (VRT) and other motor taxes<sup>17</sup> which would effectively punish those who face barriers in transitioning away from ICEVs.

Progressive implementation of carbon taxation must expand to include initiatives to assist communities who are struggling to transition away from ICEV use alongside those at-risk of experiencing household energy poverty. Energy credits and targeted social welfare increases cannot be seen as permanent solutions to these issues because they alone cannot address the

---

<sup>12</sup> *ibid*

<sup>13</sup> [EmpowerMed – Gender & Energy Poverty: Facts and Arguments](#)

<sup>14</sup> [National Traveller Money Advice & Budgeting Service – Factsheet Energy Poverty: Key Facts on Energy Poverty Amongst Travellers Living in Mobile Homes/Trailers](#)

<sup>15</sup> [OECD - Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet](#)

<sup>16</sup> [TII – Travelling in a Woman's Shoes Report](#)

<sup>17</sup> *Climate Action Plan 2024*, p. 132





structural causes which create these issues in the first place – actions which prioritise initiatives that tackle these structural issues should be pursued instead.

*Climate Action Plan 2024* must commit to:

- Researching and creating actions which signal a transition away from solely relying on one-off payments and credits as a means of addressing energy poverty risk
- Expanding progressive implementation of carbon taxation policies to include initiatives to assist those who face challenges transitioning away from ICEV use
- Ringfencing carbon taxation receipts to fund initiatives that tackle structural issues which lead to the experience of energy poverty
- Ringfencing carbon taxation receipts to fund initiatives that tackle structural issues which result in challenges transitioning away from ICEV use
- Develop a scheme similar to the Building Energy Rating Certificate (BER) for trailers, caravans and mobile homes to assess the energy efficiency of these dwellings and to enable the establishment of an energy efficiency goal for 2030 and 2050
- Establish grant schemes to assist the purchase of energy efficient caravans, trailers and mobile homes to reduce levels of energy poverty in the Traveller community

**Commit to the development of a post-growth and care-centred economy, building on work already carried out through the *Beyond GDP – Quality of Life Assessment and The Well-being Framework***

*Climate Action Plan 2024* notes a worrying trend for Ireland’s legally-binding carbon emissions reductions targets – that economic growth and GHG emissions trend upwards together. Periods such as the economic downturn of 2008 and the outbreak of COVID-19 resulted in reduced annual emissions, but both were exceptional circumstances sharing only disrupted economic activity in common<sup>18</sup>. Research from the Nevin Economic Research Institute (NERI) shows that incidents of environmental decoupling – where pressures on the environment grow more slowly than economic activity – are rare and insufficiently sustained in Ireland<sup>19</sup>. The average Irish lifestyle is highly carbon-consumptive and inefficient – in 2023, the Global Footprint Network, who are responsible for calculating Earth Overshoot Day, estimate that if every person on the planet followed the average Irish lifestyle, the entirety of the resources that the planet can regenerate would be used up by May 2<sup>nd</sup> of that year<sup>20</sup>.

---

<sup>18</sup> p. 14

<sup>19</sup> [NERI Report Series No. 14 – The Irish Economy and the Environment: An assessment of its impact and the extent of decoupling](#)

<sup>20</sup> [Earth Overshoot Day – Country Overshoot Days 2024](#)



Government has acknowledged that relying solely on GDP and economic growth is not a good indicator of quality of life for the population<sup>21</sup>; additionally, research has also shown that continued unfettered economic growth is not environmentally sustainable<sup>22,23</sup>. Taken further, research has also found correlations between inequitable societies and worsened environmental degradation and higher GHG emissions<sup>24</sup>. There is a need to pursue an alternative economic model which centres quality of life and reduces pressure on the environment, as well as reduces GHG emissions. Such a model would also fit with the EPA's ICCA recommendation of prioritising equity and wellbeing to enable resilience to the impacts of the climate crisis and enable acceptance of the transformative changes required to address the climate crisis.

Proposed alternative economic models exist which recentre the current economic system around meeting human needs and addressing inequity<sup>25,26</sup> whilst living within the nine planetary boundaries that regulate the stability and resilience of Earth's systems<sup>27</sup>. Concepts such as the Rights of Nature, raised by the recent Citizens' Assembly on Biodiversity Loss<sup>28</sup>, can contribute to these discourses by interrogating how current economic ideas around value impact our biodiversity and natural resources.

Revisiting this submission's earlier point surrounding care, a care-centred economy proposes redefining economic value to focus on care and care work – both of people and the environment – and prioritising the pursuit of wellbeing, rather than the maximisation of economic growth. This means valuing and resourcing public childcare, healthcare, older person care and disabled person supports to live independently while ensuring care jobs have high quality pay and working conditions as well as an organised workforce with rights to collective bargaining alongside eliminating social issues like poverty and discrimination. It would also create the conditions to truly care for our natural resources and environment, moving away from extractive and damaging production practices and into the provision of sustainable public services, specifically public transport and public green energy infrastructure. It would mean greater access to green spaces to be enjoyed by all and would reward green, organic and diverse forms of agriculture.

---

<sup>21</sup> Budget 2024 – Beyond GDP: Quality of Life Assessment, p. 1

<sup>22</sup> Thomas Weidmann et al (2020) Scientists' warning on affluence. *Nature Communications*, vol. 11, article no. 3107. <https://doi.org/10.1038/s41467-020-16941-y>

<sup>23</sup> William J. Ripple et al (2017) World Scientists' Warning to Humanity: A Second Notice. *BioScience*, Volume 67, Issue 12, December 2017, Pages 1026–1028, <https://doi.org/10.1093/biosci/bix125>

<sup>24</sup> S. Nazrul Islam (2015) Inequality and Environmental Sustainability. United Nations Dept of Economic and Social Affairs Working Paper No. 145

<sup>25</sup> Kate Raworth (2017) Doughnut Economics: Seven Ways to Think Like a 21<sup>st</sup> Century Economist. ISBN: 9781603586757

<sup>26</sup> Ian Gough (2017) Heat, Greed and Human Need: Climate Change, Capitalism and Sustainable Wellbeing. ISBN: 9781785365119

<sup>27</sup> Johan Rockstrom et al (2009) A safe operating space for humanity. *Nature*, issue 461, pp. 472-475. <https://doi.org/10.1038/461472a>

<sup>28</sup> Report of the Citizens' Assembly on Biodiversity Loss, p. 16



Through *Beyond GDP* and *The Well-being Framework*, Government has already taken steps to change accepted norms around approaches to expenditure and policymaking decisions. The scale of threat that climate change poses requires an even more ambitious pace in pursuing wellbeing and care over continuous economic growth. This would not only help in reaching legally binding carbon emissions reductions targets, but would also work towards creating a more equitable society which does not live beyond the means of what our planet can sustain.

*Climate Action Plan 2024* must commit to:

- Creating actions which pursue sustained environmental decoupling and establishing a target year for permanent decoupling
- Use of the *Beyond GDP – Quality of Life Assessment* and well-being metrics to assess the holistic impacts of Climate Action Plan 2024 actions
- Pursue Recommendations 31c and 31d<sup>29</sup> of the Citizens’ Assembly on Biodiversity Loss concerning amendments of the Constitution to grant nature legal and procedural rights
- Collate examples of existing good practise of creating care-centred infrastructure, such as Barcelona’s [Ciutat Cuidadora \(Caring City\) initiative](#), to assess for replication
- Establishing target years for the delivery of universal public services such as childcare and healthcare, public transport and green energy infrastructure

---

<sup>29</sup> Report of the Citizens’ Assembly on Biodiversity Loss, p.16, Recommendation 31: “There should be a referendum of the people to amend the Constitution with a view to protecting biodiversity – the proposal to amend the Constitution should include... (c) Substantive rights of nature, recognising nature as a holder of legal rights, comparable to companies or people e.g. to exist, flourish/perpetuate and be restored if degraded; not to be polluted/harmed/degraded. (d) Procedural rights of nature, e.g. to be a party in administrative decision-making, litigation, etc. where rights are impacted/likely to be impacted.”