

Submission to the Consultation on the establishment of a Just Transition Commission in Northern Ireland

Feminist Communities for Climate Justice

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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.

This submission reflects and reinforces the points raised by [Environmental Justice Network Ireland](#) in response to the same consultation.

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.

About the Consultation:

The Department of Agriculture, Environment and Rural Affairs (DAERA) seeks to gather views on the establishment of the Just Transition Commission for Northern Ireland. This consultation seeks to gather views to help inform final policy development and decisions to be made by the DAERA Minister and the Northern Ireland Executive in relation to the establishment of the Just Transition Commission for Northern Ireland.

Responses to this consultation will be used to inform the work being conducted by DAERA to establish the public body, as well as informing the new Commission of the views of the public as to what duties and responsibilities are seen as being important in conducting its role.

This consultation will focus on the proposals to establish the Commission including; the type of public body the Commission should be; its composition; the Commission's role and legislated functions; the proposed sectors to be represented; its reporting arrangements; and the secretariat and support required.

Q1. Do you agree with the proposal that the Commission should be established as an Advisory Non-Departmental Public Body with the chair and its members recruited in line with the guidance issued by the Commissioner for Public Appointments?

Yes

Please provide comments to support your answer

This approach will ensure that appointments are made transparently, based on merit, without political bias, enhancing the Just Transition Commission's (JTC) credibility. A 50:50 gender quota should be implemented, alongside other diversity targets, to achieve a balanced, inclusive composition. The recruitment process should actively encourage applications from underrepresented women and communities and the selection/interview panels should reflect this diversity also.

Q2. Do you agree the Commission membership should be between 7-20 members?

Yes

Please provide comments to support your answer

20 members provides an opportunity for a diverse group, ensuring a wide array of perspectives heard while maintaining effective decision-making and a manageable size for efficient and productive discussions and outputs. The JTC should be adequately resourced and prioritise women's voices and experiences, addressing issues such as the value of care work, and ensuring the transition is inclusive and equitable for all. The JTC must ensure that its membership:

- meaningfully includes and represents women and marginalised communities, reflecting those who face the greatest challenges, with specific attention to the diverse needs of women and girls
- reflects both place-based and identity-based communities that encounter additional barriers in the green transition, through the collection and analysis of relevant data*
- prioritises 50:50 gender balance in its membership

* = a guiding definition of 'just transition' should consider and include identity-based factors - how the transition affects women, Travellers, migrants, lone parents, and other groups; economic factors - the impact on jobs and sectors that are heavily dependent on carbon emissions e.g. agriculture, construction, mining and quarrying; and geographical factors - how specific regions and areas centred around high-carbon industries will be impacted, the communities on our islands, on the Border and in NI, urban and rural. It is important to bring an all-island perspective to this work.



Q3. Do you agree the Commission membership should meet on average 15 days per year?

Yes

Please provide comments to support your answer

Meeting 15 days gives time for meaningful discussions, decision-making, and addressing key issues. However, to ensure accessibility and inclusivity, meetings should be: offered in online, offline and hybrid formats; flexible with options for daytime and evening sessions to accommodate women with caring responsibilities, parents, and others with additional commitments; and at accessible venues to ensure participation from individuals with diverse needs. There should be an allowance for absences up to a specified number of days, as agreed by the JTC during their initial meeting/s. This ensures flexibility for members while maintaining the Commission's effective functioning. The JTC should also allow for formation of working groups for ad-hoc and or specific issues.

Q4. Do you agree that the Commission should be similar to the Scottish model and supported by a small team to provide a secretariat function to allow the Commission to function effectively?

Yes

Please provide comments to support your answer

A clear set of tasks/responsibilities should be devised for the secretariat in collaboration with the JTC to ensure that all needs are covered/facilitated such as helping managing logistics and communications; ensuring that all members, especially those from underrepresented or marginalised groups, are not burdened or overwhelmed with administrative tasks that take from the JTC's core function, efficiency and effectiveness for the benefit of society. The secretariat could assist in organising the online / hybrid, morning / evening meetings etc. to ensure that women, parents, and individuals with caring responsibilities are able to participate also within the JTC and external to it when consulting various diverse stakeholders for real-life experiences to shape JTC work and recommendations. The secretariat should be adequately resourced, budgeted for, and gender and equality proofed in its make up.

Q5. Do you agree that members appointed to the Commission should serve a term of 5 years?

Yes

Please provide comments to support your answer

A 5-year term provides continuity and stability in the Commission's work, while also allowing refreshment of membership.

Q6. Do you agree that the Commission would fulfil the oversight function required of it in the Act by reviewing and reporting on the development and implementation of:

- any sectoral plan published under sections 13 to 21 of the Act;
- any climate action plan published under section 29 or 51 of the Act; and
- any scheme established by Regulations under section 31 of the Act.

Yes

Please provide comments to support your answer

The oversight role is crucial to ensure plans are effectively implemented and climate- and equality-proofed. The JTC should identify gaps, suggest improvements, and ensure actions are taken to achieve the Act's goals. However, clarity is needed on the consequences if departments fail to implement JT with clear accountability mechanisms in place.

The JTC should develop time sensitive JT indicators to assess progress and ensure transparency by making these metrics and progress reports publicly available. It's also essential that the JTC oversees the Just Transition Fund for Agriculture due to the sector's significant emissions impact. Government departments must be required, by regulation, to recognise, consider and respond to the JTC's feedback on their plans and policies providing a report or evidence on how the feedback was implemented or why it was not. These reports should be reviewed annually by an appropriate government committee, with recommendations for policy reform. The government should be obligated to consider these recommendations to improve and promote JT and its effectiveness in our society.

The JTC should define a Just Transition with broad guiding criteria. This definition should include the factors mentioned earlier: identity-based, economic, and geographical factors. JT can reduce carbon emissions while addressing social inequality. We can have climate and JT policy that puts people and planet first, that can be transformative in creating a fairer, cleaner, more prosperous and

more equal future in which all women, communities, workers, and counties benefit. This is what a truly just transition should look like.

Q7. Do you agree that the Commission would be fulfilling its advice function by:

- **Responding to a Northern Ireland department's request for advice within agreed timeframes**
- **Issuing research and guidance documents for departments to review and consider when developing emission reduction policies**

No

Please provide comments to support your answer

Government departments and public bodies should be required to implement the recommendations of the JTC. Departments must provide a written report or evidence acknowledging that they have considered and/or incorporated the research and guidance documents from the JTC in the development of their emission reduction policies. The report should detail exactly where and how the responses, guidance, or feedback from the JTC have been integrated and if they are not incorporated, departments should provide a clear and detailed explanation on it has not been done - this accountability ensures that the JTC's advice is not just considered but actively used to influence policies.

Q8. Should the Commission include representation from the Transport sector?

Yes

Please provide comments to support your answer

Transport is a crucial part of our green transition and systemic changes are needed in Northern Ireland's car dominated transport system. Most of our trips are taken by car, but 68% of all trips are for distances of less than 10km. Transport is the second-largest emitter (18%) in Northern Ireland, with emissions rising by 21.5% since 1990. Northern Ireland's car dependency (70% of journeys by car, just 5% by public transport) is a challenge to meeting climate targets. Currently, public transport does not reach rural communities sufficiently, still has many accessibility issues for disabled people, and has poor compatibility with caring journeys. There are also concerns around safety on public transport, particularly for women. As a result, many are locked into car dependency. To reduce carbon emissions, we must focus on making public transport more accessible, affordable, and available, especially in rural areas where options are limited.



A 2022 report on decarbonising road transport highlighted that the Regional Transportation Strategy is outdated and needs to be replaced by a green transport policy. The JTC must include transport sector expertise to monitor initiatives like Translink's 2030 strategy to cut emissions by 50% and promote zero-emission transport. Women, carers and disabled people should be represented in the JTC to reflect their experience of transport in NI and beyond.

A JT in transport would mean our transport system would be truly inclusive, accommodating the needs of disabled individuals, supporting caregiving responsibilities, affordable to use, and ensuring safety for all users. It would mean timetables which accommodate all kinds of journeys and regular services available in all areas of the country - active travel should be available to all.

Q9. Should the Commission include representation from the Energy sector?

Yes

Please provide comments to support your answer

Energy poverty, central to just transition, affects 20-40% of households in Northern Ireland due to low income, inefficient homes, and high energy prices. The most recent official figure for fuel poverty in NI is 22% - this was measured by the 2016 House Condition Survey. In September 2024 National Energy Action commissioned a poll which found that 40% of NI households were spending more than 10% of their income on their home energy costs; 68% of all households are reliant on home heating oil, a non-regulated fuel; and 19% of households went without heating (oil/gas) or electricity as they could not afford the costs of energy within the previous 24 months. 1 in 10 households admitted to skipping meals to ensure they had enough money to pay for their energy. Every winter in the North 290 people die due to cold homes.

The JTC should address energy's multifaceted nature; improving home energy efficiency helps cancel out energy poverty and improve public health, with significant savings for society. Existing programs like the Affordable Warmth Scheme and NI Sustainable Energy Programme (NISEP) should be monitored for gaps as unmet demand and need for vulnerable households continues.

A just transition in energy and housing would ensure that everyone can live in warmth - regardless of whether they live in a house, apartment, or trailer, and regardless of if they rent or own or seek refuge there. It would mean ensuring those most vulnerable to energy poverty are prioritised for retrofitting. A true just transition would also support workers in industries affected by the shift to renewable energy, ensuring they are not left behind. The growth of renewable energy in Northern Ireland and the island will create jobs, but planning is needed to ensure skill development, decent high-quality pay and working conditions, and shared community benefits. A country powered by publicly owned green energy would eliminate the existing fluctuations in price.



Q10. Should the Commission include representation from the Financial/Green Finance sector?

Yes

Please provide comments to support your answer

Financial support is essential for a just transition at all levels and both public and private funding must align with just transition principles to ensure fairness and inclusivity. The International Labour Organisation (ILO) highlights the need for long-term public finance to support workers, marginalised communities, and consumers, while the Intergovernmental Panel on Climate Change (IPCC) stresses the importance of climate finance for fair low-carbon transition. The JTC should guide funding strategies and reimagine financial systems to make the transition is truly just - this is especially crucial for sectors like agriculture, where significant investment is needed to decarbonise and diversify, and for vulnerable communities and women where decarbonising schemes and grants like retrofitting do not include or benefit them.

Q11. Are there any other sectors in addition to the Transport, Energy, Finance and those listed in 37(4) of the Act that should be represented on the Commission – and if so, please provide reasons for your answer.

Yes

Please provide comments to support your answer

In addition to the sectors listed in the Act (agriculture, fisheries, academia, trade unions, youth groups, civic society, and environmental groups), representation from women's rights organisations, community groups, Travellers, people seeking international protection, older people, and health and social care sectors should also be included. Disadvantaged and marginalised groups are most vulnerable to climate change and will face greater challenges from government adaptation and mitigation strategies. The Paris Agreement and the UNFCCC recognise that climate change exacerbates gender inequalities, especially for women and girls.

Women's socioeconomic disadvantage compared to men – gender pay gap, gender pension gap, motherhood penalty - in addition to cultural attitudes that create disadvantages and barriers to their full participation in social, cultural and economic life create uniquely gendered interaction to environmental degradation that has been well researched. Policy responses that don't address these inequalities risk worsening gender inequality. The transition must consider gendered impacts, particularly in sectors like energy, transport, health, land use, food production, and agriculture. The JTC should ensure policies and actions advance gender equality and avoid further marginalisation



of vulnerable groups such as women, Travellers, disabled people, and those in emergency accommodation.

A just transition in agriculture should promote environmentally friendly practices, supporting women farmers and diversifying land use to restore and regenerate biodiversity. The colonisation of Ireland led to deforestation, stripping the land of its heritage and biodiversity. Today, similar patterns persist, with extractive industries like mining and data centres being prioritised over the needs of people, causing energy and water shortages in local communities. A just transition in these areas would mean that environmentally friendly farming would earn a farmer more money than agricultural practices that strip our soils of life and pollute our waterways; it would mean that the needs of communities and our environment would come before the desires of industries and fossil fuel companies. It would also mean that those who pollute or destroy our environment are held legally and financially responsible for their actions.

The climate crisis poses significant health risks, including air pollution, heatwaves, and eco-anxiety, which disproportionately affect those already facing barriers to healthcare. Extreme weather like flooding and storms can damage access routes to health services and the buildings housing them. Our health, both now and in the future, is intrinsically linked to the climate. A just transition in health should recognise the connection between environmental, climate and public health, incorporating and advocating for climate-positive actions that improve physical and mental health for all such as improving our air quality for respiratory and reproductive health and creating more access to green spaces to improve overall physical and mental health.

It is impossible to discuss creating any kind of just transition without addressing the loss of biodiversity in the North. The State of Nature Report 2023 shows that Northern Ireland is now one of the most nature-depleted countries in the world, with 12% of species assessed threatened with extinction. Healthy biodiversity and natural capital are critical for human survival, providing the ability for us to grow food and create medicines. The economy and society are intimately dependent on the health of the natural environment, yet for years and years we have taken more than nature can replenish and are now beginning to see the consequences of this. Reversing biodiversity loss is critical for a just transition in any sector that the JTC ultimately represents, as well as being an intergenerational issue – deciding whether or not we will be the generation that removes the right to a healthy environment for those who come after us.

Q12. Do you agree the Commission should have a power to establish Ad-Hoc Committees or working groups to secure additional knowledge or expertise that may not be available with the Commission.

Yes

Please provide comments to support your answer

Yes, and it is essential that funding is allocated to reimburse individuals for their time and expertise, especially for those from marginalised or underrepresented communities and or those having to cover care costs to attend/participate in ad hoc committees or working groups. Additionally, ensuring that meetings are scheduled at convenient times and conducting effective outreach can help facilitate broader meaningful participation and inclusion, making the process more accessible and equitable.

Q13. What do you think the key initial priorities should be for the Commission?

Please provide comments to support your answer

(a) Create a guiding definition of "just transition" that considers:

- Identity-based factors: How the transition affects women, Travellers, migrants, lone parents, and other groups
- Economic factors: The impact on jobs and sectors that are heavily dependent on carbon emissions e.g. agriculture, mining and quarrying, construction and more.
- Geographical factors: How specific regions and areas in Northern Ireland, which are centred around industries which will face large-scale changes or eventual obsolescence such as mining and agriculture, will be impacted and what compensation/how the net-zero transition will transform such geographical areas. This should also include areas which are/will be vulnerable to flooding and sea level rise, communities on our islands, on the Border and in NI, urban and rural. It is important to bring an all-island perspective to all of this work.

This definition should guide all actions taken by governments, businesses, and other stakeholders.

- (b) Collect detailed data on gender, disability, and ethnicity in key areas like energy, transport, and health to ensure that all climate policies and investments can be properly gender, poverty and equality-proofed. 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 economy and policy should be scaled up to benefit people and the planet.

- (c) The Just Transition Commission in Northern Ireland should centre the voices of women, addressing issues like the value of care work and ensuring that the transition is inclusive and equitable for all.
- (d) The JTC has an opportunity that no other equivalent commission has done so far: to promote the recognition of care and caring work as low-carbon and green work within just transition strategies. This recognition should be supported by substantial investment in care and social infrastructure. 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. It also means care for the environment. The Republic of Ireland’s Environmental Protection Agency’s ICCA (Ireland’s Climate Change Assessment) report emphasises prioritising equity and wellbeing in climate policy for a successful low-carbon transition and a society more resilient to climate impacts. Care work requires minimal natural resource extraction, produces 26 times fewer greenhouse gas emissions than manufacturing and over 200 times less than agricultural jobs, and it is essential for life. Care plays a key role in the gendered impacts of climate change on women and girls.