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National Women's Council Submission to the UN Call for Input: Planning and the Right to a Clean, Healthy & Sustainable Environment

Call for Input: Planning and the right to a clean, healthy and sustainable environment

This input to inform the Special Rapporteur (SR) on the right to a clean, healthy and sustainable environment's (RCHSE) thematic report to the 81st session of the United Nations General Assembly has been submitted by the [National Women's Council of Ireland](#) (NWCI).

NWCI is the leading representative organisation working for women's rights and equality across the island of Ireland, founded in 1973. We are rooted in our membership. We work together with our almost 200 member groups across the island of Ireland and a growing community of individual supporters to deliver on our purpose – to achieve women's rights and equality.

This submission has been informed by consultation with our membership and the Policy & Advocacy working group of the [Feminist Communities for Climate Justice National Network](#).

General inputs on planning processes and tools for the advancement of the protection of RCHSE:

NWCI calls specific attention to the following objective of the SR's mandate, *"To apply a gender perspective by, inter alia, considering the particular situation of women and girls and identifying gender-specific discrimination and vulnerabilities when addressing climate change and environmental degradation, strengthening and promoting women's and girls' leadership, decision-making and their full, equal and meaningful participation, and addressing good practices where women and girls act as agents of change in safeguarding and managing sustainably the environment."*

Women and girls are disproportionately disadvantaged by environmental degradation, including the deterioration of clean, healthy and safe environments. Gender inequality, gendered socioeconomic disadvantage and poor gender representation in decision-making spaces contribute to social, economic and political inequalities in meaningful participation and responses to climate change for women and girls globally.

The number of countries with designated national gender and climate change focal points at COP is 118 (up from just 38 in 2017), but less than half of countries surveyed by UN Women report that bodies responsible for gender equality are not included in national coordination mechanisms for climate change. One third of those countries have established dedicated task forces or working groups for the integration of gender equality into climate policymaking.¹ A few countries have dedicated gender and climate action plans or gender and environment data strategies.

The use of gender budgeting (GB) in policymaking and planning processes has great potential in complementing human rights and ecosystem-based approaches in realising RCHSE, whilst ensuring the equal participation and representation of women and girls. 61% of OECD countries practise a form of GB², but progress and implementation are not always consistent or linear. UN Women found that only

¹ [Driving Gender-Responsive Climate Action: The Role of Institutional Enablers \(2024\)](#)

² [Gender Budgeting in OECD Countries 2023 \(EN\)](#)

26% of 105 countries have comprehensive systems to track gender equality allocations in their budgets.³ Even where GB is carried out, its impact on budgetary decisions is not always guaranteed – more than half (52%) of OECD countries cited ‘lack of impact on budget decisions’ as a key implementation challenge.⁴ Embedding gender mainstreaming and GB in all policymaking is one of the seven key objectives of Ireland’s National Strategy for Women and Girls (2025-2030) under the heading of ‘Being Counted’, including mandatory training for public officials and improved collection and reporting of equality data to inform policy.⁵

The institutional and technical requirements of GB are often barriers to meaningfully enabling the practice, including lack of guidance, coordination and expertise amongst civil servants, and poor data. Concerns about poor quality gender impact assessments (GIAs) were raised by 60% of G20 countries.⁶

Gender-responsive climate change budgeting (GRCB), where gender equality is incorporated into climate-related public finance decision making, is a newer practice which could ensure that GB is part of climate budgetary decision-making. GRCB remains underutilised as a practice – a mere 2% of climate finance flows were identified as gender-responsive in 2019-2020⁷, and only 17 countries of the 194 parties to the Paris Agreement have committed to using gender-responsive budgeting in their climate plans as of 2022.

There is great potential in GRCB as a planning tool to enable RCHSE. Climate finance mechanisms which take gendered impacts into account create a double benefit of tackling climate change and improving the livelihoods of women and girls; improved gender equality leads to increased socioeconomic development and environmental sustainability, including improvements in adaptation and mitigation efforts.⁸

The overwhelming majority of global climate finance efforts are dedicated to mitigation (60%-90%) and are focused on male-dominated industries like transport and energy. Mitigation activities like water filtration projects and public transportation harness great potential for women’s empowerment but are seldom designed to take these gendered benefits into account. Mitigation sectors with high participation of women like agriculture receive less than 4% of climate finance despite having higher mitigation potential.⁹

Adaptation requires larger upfront investment, and financial returns are far less immediate. Women dominate many of the key industries involved in adaptation, such as agriculture, forestry and land use. But even where finance is available, gendered barriers to accessing it persist – time poverty, impeded access to credit/loans and differential treatment by markets/institutions are all barriers to climate finance for women. These are structural barriers which must be addressed alongside the introduction of targeted climate finance for women at community/grassroots levels.

³ Gifford and Khan (2023) [Strengthening public finance management systems for gender equality and women’s empowerment: Promising practices and remaining gaps](#)

⁴ [Gender Budgeting in OECD Countries 2023 \(EN\)](#)

⁵ [National Strategy for Women and Girls 2025-2030: Seven Strategic Objectives](#)

⁶ [IMF Working Papers Volume 2021 Issue 269: Gender Budgeting in G20 Countries \(2021\)](#)

⁷ [Global Landscape of Climate Finance 2021 – Climate Policy Initiative](#)

⁸ [Gender and Climate Finance – United Nations Development Programme](#)

⁹ [Global Landscape of Climate Finance 2023 – Climate Policy Initiative](#)

NWCI recommends that the SR includes a recommendation for all states to introduce GRCB in the thematic report to the 81st session of the United Nations General Assembly.

Information on mechanisms in place to incorporate diversity of voices and interests in planning processes, while identifying and preventing potential conflicts of interests:

Lobbying and uneven power dynamics between communities/grassroots activism and large corporations has ramifications for the realisation of RCHSE. Disparities in financial resources, frequency of meetings, and access to key decision-makers in the planning process means that corporate interests have an outsized impact in the planning process. One in every twenty-five participants at COP30 represented the interests of the fossil fuel industry, outnumbering every country's delegation barring Brazil's¹⁰. The Paris Agreement acknowledges the need to address financial flows that are inconsistent with emissions reductions targets, but many states are reluctant to put the necessary regulations in place. EU Member States have instead encouraged transparency and additional reporting on sustainability efforts rather than implementing sanctions or standards¹¹ – this approach has been watered down in recent months with the EU Omnibus I Directive simplifying the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD).

Large corporations in the fossil fuel, agricultural and tech industries have had an outsized impact on climate policy globally. Oil companies like Exxon have deliberately misled decision-makers and the public for decades on the global warming effect of burning fossil fuels, admitting that this was done to delay climate action internally and externally¹². Former French environmental minister Nicolas Hulot cited the presence of lobbyists in 'the circles of power' in his resignation, a year after a bill he introduced to phase out the renewal of fossil-fuel exploitation permits was weakened following extensive lobbying and threats from the private sector¹³. In the year following Russia's invasion of Ukraine, fossil fuel industry representatives met with senior European Commission staff more than 200 times – more than three meetings every week¹⁴. Non-business interests in EU agency consultations make up only 5% of participating stakeholders, and MEPs expressed concern about an asymmetry of lobbying activity and expertise between the financial sector and other stakeholders¹⁵.

Such actions erode trust in the government from the voting public – only around 30% of those in OECD countries believe their governments can resist corporate influence, and the share of those who have low to no trust in their governments outweighs those with high to moderately high trust¹⁶.

Ireland's heavy reliance on imported oil and gas for energy has resulted in lobbying from importers and distributors of fossil fuels, with impacts for climate and energy policy. Whilst Ireland does not have a major fossil fuel industry of its own, it subsidised the industry up to €4.9 billion in 2023 through

¹⁰ [Fossil fuel lobbyists outnumber all Cop30 delegations except Brazil, report says - The Guardian](#) (2025)

¹¹ [The Hidden Truth: Ireland's Role in the Fossil Fuel Industry](#) (2025) ActionAid Ireland & Trocaire

¹² [Exxon sowed doubt about climate crisis, House Democrats hear in testimony - The Guardian](#) (2019)

¹³ [Time to ensure climate policy serves the public, not lobbyists](#) (2019) – Social Europe

¹⁴ [Cold homes, hot profits: How polluters persuade politicians to put profits before people](#) (2023) – Fossil Free Politics Campaign

¹⁵ Beyers, J. and Arras, S. (2020) "Who feeds information to regulators? Stakeholder diversity in European Union regulatory agency consultations". *Journal of Public Policy*, vo. 40, pp. 573–598

¹⁶ [OECD Survey on Drivers of Trust in Public Institutions – 2024 Results \(EN\)](#)

preferential tax treatment and direct subsidies. The budgetary cost of these subsidies was six times higher than the Government's entire carbon tax intake in 2017, and significantly higher than budgetary allocations to Just Transition and biodiversity¹⁷. The OECD has advised that Ireland gradually removes remaining tax exemptions and rebates which encourage wasteful fuel usage in a number of sectors such as agriculture, transport and heating¹⁸.

Existing planning tools and how they are implemented, including how access to information, public participation and access to justice is guaranteed during the planning processes and the decision-making stages:

Public consultations are an important mechanism in democratic policymaking, with well-executed consultations allowing a diversity of voices to meaningfully co-create policies alongside their decision-makers and highlight potential gaps in impact and implementation. In comparison, poor consultation experiences can create distrust in the process. Only around 30% of those in OECD countries think their political system would adopt opinions expressed in a public consultation¹⁹.

Consultation processes which lack meaningful engagement and have poor feedback loops can lead to consultation fatigue – inaccessibility, lack of clarity and implementation can create apathy and a reduced desire to engage in the future. Consultations relevant to RCHSE, such as renewable energy and active transport infrastructure, often involve myriad technical documents, environmental assessments and planning submissions for communities to review and respond to under a limited timeframe. These documents can be inaccessible for those without the required technical knowledge and with limited literacy skills.

Women from low-income or marginalised communities, in attempts from decision-makers to ensure their inclusion, can be simultaneously 'over-consulted' but 'easy to ignore', seeing little of their input reflected in policy changes. In-person consultation events such as stakeholder fora and focus groups can be held in locations or at times that are inconvenient, lack embedded gender-sensitivity, or accessibility consideration.

Case Study: Ireland's public consultation on the regulation of costs payable under the Planning and Development Act 2024 (Scale of Fees)

Ireland's Department of Climate, Energy & the Environment held the above consultation from December 3rd, 2025, to January 15th, 2026.²⁰ This consultation concerned the introduction of a scale of fees for environmental judicial reviews and invited stakeholders to give input on a completed report setting out proposals for the scale of fees. However, multiple²¹

¹⁷ [Fossil fuel subsidies rose to €4.9 billion in 2023 – Social Justice Ireland](#) (2025)

¹⁸ [OECD Environmental Performance Reviews: Ireland 2021](#)

¹⁹ *ibid*

²⁰ [Consultation on the regulation of costs payable in matters prescribed on foot of section 294 of the Planning and Development Act 2024 \(Scale of Fees\)](#)

²¹ [Submission by Environmental Justice Network Ireland \(EJNI\) to the Public Consultation on the regulation of costs payable under the Planning and Development Act 2024 \(Scale of Fees\)](#)

organisations²² criticised²³ the consultation's framing, timing and the late release of important and relevant information to the consultation.

Key information had not been disclosed at the outset of the consultation; the information that was presented was unclear; and the completed report of proposed fee scales had not been shaped by input from stakeholders or the public beforehand. Two pieces of documentation relevant to the consultation were not added until December 9th and December 23rd. The consultation's closing date was not extended despite the addition of this documentation three weeks into a seven-week consultation, two weeks of which fall into a typical holiday period (Christmas and New Year's). The Bar of Ireland said of the consultation, "... *these circumstances give the impression not of a genuine consultation with interested parties in relation to a public policy matter of very considerable importance, but rather an attempt to achieve a predetermined end without genuine consultation.*"²⁴

Whilst expert bodies and advisory groups are important to consult for relevant policy areas, Governments should not over-rely on inputs from these groups at the expense of public input. Higher rates of participation are linked to the provision of relevant information to consultees, but all relevant information should be provided in as simple a format as possible, with accessibility measures such as Easy Read formats and Sign Language Interpretation provided where necessary.²⁵ Targeted consultations of underrepresented communities can better enable participation through appropriate venue and timing choices, as well as the reimbursement of costs for care and travel expenses. The window of time for consultation should be generous and proportional to the scale of the proposed policy/law. Time allowed to respond should consider the time taken for consultees to consume all relevant documentation provided; and that underrepresented/under-organised communities may not have the resources at their disposal to have pre-prepared drafts in advance of consultations.

Research demonstrates that consultation processes can increase public trust in decision makers and in decisions ultimately made. But to enable these positive trends, consultation processes themselves must be accessible; stakeholders should be consulted as early on in the process as possible, ideally as soon as the issue that the policy/law aims to address has been identified and not merely on an already drafted policy/law; accompanying documentation should be accessible; stakeholders should have appropriate time to intervene; and feedback should be given to stakeholders on how final decisions were made, including justifications of why certain decisions were prioritised over others.²⁶

²² [Capping legal costs in environmental cases 'unlawful' - An Taisce - Agriland.ie](#)

²³ [Submission by the Bar of Ireland: Regulation of Costs Payable in Matters Prescribed on Foot of Section 294 of the Planning and Development Act 2024](#)

²⁴ *ibid*, pg. 9

²⁵ [OECD Best Practice Principles on Stakeholder Engagement in Regulatory Policy](#) (2017)

²⁶ Rangone, N. (2020) "Effective Consultation as a Tool for Trust" in De Benedetto et al (2020) *The crisis of confidence in legislation* (eds), Nomos-Hart. Available at: <https://ssrn.com/abstract=4392714>