

# Women's Policy Group NI

## WPG NI Response to the Department for the Economy's consultation on Onshore Petroleum Licensing Policy

April 2024

**Contact:**

Elaine Crory  
Women's Sector Lobbyist  
[elaine.crory@wrda.net](mailto:elaine.crory@wrda.net)

## **1. Introduction:**

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net)

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Meghan Hoyt - Women's Resource and Development Agency
- Jonna Monaghan - Women's Platform
- Rebekah Corbett - UNISON

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response.

## **2. Past Consultations Responses, Evidence Submissions and Briefings:**

The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to Climate Change, the Environment and the Economy in this context. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG COVID-19 Feminist Recovery Plan [Key Briefing](#): Climate Justice is a Feminist Issue<sup>1</sup>
- WPG [Response](#) to Consultation on 10X Performance Management Framework<sup>2</sup>
- WPG Response to Discussion [Document](#) on a Climate Change Bill<sup>3</sup>
- WPG [Response](#) to Circular Economy Strategy.<sup>4</sup>

## 2.1. Content from previous WPG Responses

Overview of WPG Feminist Recovery Plan:

The WPG NI COVID-19 Feminist Recovery Plan highlights the disproportionate impact of the pandemic on women and makes several recommendations for addressing this impact. The Plan also provides detailed evidence of pre-existing gender inequalities in our society, which have become exacerbated as a result of the pandemic. The Plan covers a wide range of topics, including violence against women, health inequalities and women's poverty, within six main Pillars: Economic Justice, Health, Social Justice, Culture, Brexit, Human Rights and a Bill of Rights, and International Best Practice.

The WPG published a COVID-19 Feminist Recovery Plan in July 2020 (and a relaunched version in July 2021) that provided a comprehensive roadmap on how the NI Executive could not only address the disproportionate impact of COVID-19 on women, but also address the structural inequalities existed before the pandemic that led to such a disproportionate impact on women. A summary of recommendations from the Relaunched WPG Feminist Recovery Plan can be accessed [here](#).

We would like to reiterate our recommendations in relation to proposals for a Circular Economy as a way to tackle the climate crisis.

Recommendations from WPG Feminist Recovery Plan:

---

<sup>1</sup> <https://wrda.net/wp-content/uploads/2021/03/Climate-Justice-Key-Briefing-V2.pdf>

<sup>2</sup> <https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf>

<sup>3</sup> <https://wrda.net/wp-content/uploads/2021/02/WPG-Response-to-Discussion-Document-on-a-Climate-Change-Bill-01.02.21.pdf>

<sup>4</sup> <https://wrda.net/wp-content/uploads/2023/03/WPG-Response-to-Circular-Economy-Consultation-final.pdf>

In the WPG Feminist Recovery Plan, we highlight recommendations from the Women's Budget Group (WBG) and the Women's Environmental Network (WEN)<sup>5</sup>, which we have applied to Northern Ireland. These recommendations include:

- Investment in (social) infrastructure:
  - Co-designing social infrastructure at a local level with the needs of
  - women taken into account,
  - Taking the differing transport needs of women with caring responsibilities into account when creating transport plans; particularly given issues in Northern Ireland of inadequate rural public transport and the fact that women are more likely to rely on public transport.
- Green Jobs:
  - Provide subsidies and other incentives, including paid education leave, to support women, particularly low-income and Black and ethnic minority women, in accessing training and development programmes in high-skilled work in a new green economy,
  - Provide subsidies and other incentives to those working in jobs at high risk of being replaced by automaton, particularly as women are at much higher risk of this,
  - Encourage women and girls into male-dominated green sectors that are encouraged through a Northern Ireland Green New Deal.
- Sharing Care:
  - Recognising the dual-benefit job creation and increased tax revenue through investing in paid care jobs that are already done in an unpaid capacity by majority women,
  - Through increased investment in care jobs and the care sector, not only will women's employment and economic opportunities increase, but children from disadvantaged backgrounds will benefit from increasing qualities of childcare and education,
  - Broaden definitions of 'green jobs' beyond construction and technology to incorporate the care sector as an already existing low carbon, high compensate sector that is increasingly neglected,
  - Ensure that all green jobs in Northern Ireland include a real living wage, are securely contracted, ethically procured and unionised,
  - Implement a 30-hour paid work week in recognition of unavoidable unpaid care,

---

<sup>5</sup> Women's Environmental Network (2021) 'Feminist Green New Deal' <https://bit.ly/3j3r69x>  
Maeve Cohen and Sherilyn MacGregor (2020), 'Towards a Feminist Green New Deal for the UK: A Paper for the WBG Commission on a Gender-Equal Economy', UK Women's Budget Group and Women's Environmental Network. <https://bit.ly/3xOQiVl>  
Maeve Cohen and Sherilyn MacGregor (May 2020), 'What would a Feminist Green New Deal look like? - Summary Briefing', UK WBG and WEN. <https://bit.ly/3zTvptY>

- Actively encourage and incentivise care leave and caring responsibilities being undertaken by men,
- Establish a Universal Basic Income or Universal Basic Services to ensure minimum living standards and recognise and remunerate the £4.6 billion unpaid carers contribute to Northern Ireland each year,
- Balance recommendations for greater food self-reliance with recognition of the gendered, unpaid and low-paid labour involved in producing and providing food, particularly as Northern Ireland may be disproportionately impacted by different food standards to Great Britain post-Brexit,
- Supporting and developing sustainable small businesses that reduce domestic work through mass preparation and distribution of locally grown food.
- Democracy and Ownership:
  - Promoting economic, ecological and carbon education campaigns for schools and the wider public to be adequately funded through a Climate Change Act and within the Programme for Government,
  - Ensure equality impact assessments of all environmental policies and ensure consultation on policies with groups representing various genders, races and classes within civil society,
  - Make socio-economic equality of protected characteristics a key goal of any green new deal framework and ensure co-design of planning and policies with the Women's Sector,
  - Promote a cultural shift towards valuing care as a key part of the infrastructure of the environment and economy.
- (Inter)national Responsibilities:
  - End the hostile environment in the UK towards migrants and fully remove information exchanges between public bodies (including those in Northern Ireland) and the Home Office,
  - Promote fair tax policies which close tax loopholes, redistribute wealth between women and men and hold transnational corporations to account for exploitation of people and harm to the planet,
  - Introduce a Bill of Rights for Northern Ireland,
  - Protect human rights, including sexual rights, reproductive rights, and working rights,
  - Promote trade justice within supply chains and create ethical procurement guidelines in line with the above recommendations.

## 2.2 Recommendations from the Gender Equality Strategy Expert Advisory Panel

Several members of the WPG were on the Gender Equality Strategy Expert Advisory Panel, and we would like to take this opportunity to highlight recommendations made by the expert panel in their [report](#).

Recommendations:

- Co-design social infrastructure at a local level with the needs of women taken into account. This should include transport which is one of the biggest contributors to climate change, taking into account inadequate rural public transport in Northern Ireland and the fact that women are more likely to rely on public transport.
- Conduct a skills-needs analysis to establish the skills required by men and women to equally participate and benefit from opportunities created in the green economy. The information should be used to create targeted green skills development and training initiatives for both men and women.
- Provide subsidies and other incentives, including paid education leave, to support women, particularly low-income and Black and minority ethnic women, in accessing training and development programmes in high-skilled work in any new green economy.
- Ensure funding and resource allocation prioritises programs that train women and girls for non-traditional roles to enable them to make the transition into male-dominated occupations in the green economy.
- Ensure that all green jobs in Northern Ireland are paid at a real living wage, are securely contracted, ethically procured and unionised.
- Put in place accountability procedures to ensure all relevant stakeholders are held accountable for operating in a genderresponsive manner to achieve gender equality outcomes in the green economy. This can be done through gender responsive planning, monitoring and evaluation mechanisms to ensure that measures to advance gender equality in the green economy are having the desired impact.
- Invest in gender-disaggregated data which is critical for understanding the constraints affecting women and men's equal representation and participation in green job sectors.
- Broaden definitions of 'green jobs' beyond construction and technology to incorporate the care sector as an already existing low carbon, high recompense sector.
- Promote a cultural shift towards valuing care as a key part of the infrastructure of the environment and economy.
- Recognise the dual-benefit of job creation and increased tax revenue through investing in paid care jobs that are mostly done by women.
- Actively encourage and incentivise care leave and caring responsibilities being undertaken by men.

- Promote economic, ecological and carbon education campaigns for schools and the wider public to be adequately funded through a Climate Change Act and within the Programme for Government.
- Ensure the equal participation of rural women and girls in policy making processes on disaster mitigation and climate change.
- Ensure rural women are a target group in the development and delivery of a new Rural Development Programme for NI.
- Ensure equality impact assessments of all environmental policies and ensure consultation on policies with groups representing all Section 75 characteristics.
- Reallocate spending according to equality, wellbeing and sustainability objectives, for example, from polluting industries to green industries.

### **3. General Comments on the Onshore Petroleum Licensing Policy Consultation**

#### 3.1 The Urgency of Action

The WPG commends the Department on taking very seriously the need to act to depart from the current ‘open door’ policy. We commend the research carried out in the preparation of this document and the clear outline of the scant economic argument for continuing with the current status quo, set against the dire environmental and social risks, and the obligations that we have to work towards Net Zero. The recommendations are in line with the recommendations of the UK Climate Change Committee<sup>6</sup>, the preferred policy position of the Scottish Government<sup>7</sup>, Friends of the Earth’s policy on fossil fuel extraction<sup>8</sup>, and the London School of Economics open letter to the UK Prime Minister, signed by a wide range of experts<sup>9</sup>.

Our only concern with these proposals is that, while the moratorium will be immediate, the move towards legislation is described as “eventual”. Our position is that this should be expedited as quickly as possible. This is both because the political environment can change quite quickly, and there are those who are actively hostile towards the work that we need to do to mitigate climate breakdown, and because

---

<sup>6</sup> UK Climate Change Committee letter to the UK Government: <https://www.theccc.org.uk/publication/letter-advice-to-the-uk-government-on-compatibility-of-onshore-petroleum-with-uk-carbon-budgets/>

<sup>7</sup> Scottish Government Preferred Policy Position: <https://www.gov.scot/publications/onshore-conventional-oil-and-gas-preferred-policy-position/>

<sup>8</sup> Friends of the Earth policy position on fossil fuel extraction: <https://policy.friendsoftheearth.uk/insight/tip-iceberg-future-fossil-fuel-extraction>

<sup>9</sup> LSE Letter to the UK Prime Minister: [https://www.lse.ac.uk/granthaminstitute/wp-content/uploads/2023/03/Letter\\_to\\_the\\_Prime\\_Minister\\_28\\_March\\_2023.pdf](https://www.lse.ac.uk/granthaminstitute/wp-content/uploads/2023/03/Letter_to_the_Prime_Minister_28_March_2023.pdf)

political stability is not guaranteed, and we must act while the Assembly is fully operational.

### 3.2 Human Rights Considerations

The CEDAW Committee has prioritised sustainable development and gender equality, as inextricably linked for a sustainable future. In this context, the Concluding Observations from 2019 underline restrictions on fracking, as well as protections from toxic and hazardous chemicals. The UN Sustainable Development Goals integrate gender equality as Goal 5, and overall emphasise limiting fossil fuel extraction and use. In this light, it is important to focus on restricting further petroleum licences, and also to undertake appropriate gender and human rights analysis alongside environmental assessment before any licences are granted.

Sustainable Development Goals 6. The Committee welcomes the role played by the State party to support gender as a standalone Sustainable Development Goal and takes note of its response to the Women and Equalities Select Committee's inquiry into the domestic implementation of Goal 5 of the Sustainable Development Goals. The Committee calls for the realization of de jure (legal) and de facto (substantive) gender equality, in accordance with the provisions of the Convention, throughout the process of implementing the 2030 Agenda for Sustainable Development. The Committee recalls the importance of Goal 5 and of the mainstreaming of the principles of equality and non-discrimination throughout all 17 Goals. It urges the State party to recognize women as the driving force of the sustainable development of the State party and to adopt relevant policies and strategies to that effect.

#### 3.2.1 Human Rights Considerations with regards to Rural women

The CEDAW Committee is concerned at the obstacles faced by women and girls in rural areas to access education, employment, and healthcare and support services due inter alia to limited resources and access to transportation and Internet. In addition, while the Committee commends the measures taken in Wales and Scotland to halt the practice of hydraulic fracturing to extract fossil fuels, known as fracking, it is concerned that women in rural areas in other territories of the State party are disproportionately affected by the harmful effects of fracking, including exposure to hazardous and toxic chemicals, environmental pollution, and climate change.

Recalling its general recommendations No. 34 (2016) on the rights of rural women, the Committee recommends that the State party:



(a) Adopt inclusive and accessible measures to facilitate women and girls access to education, employment, healthcare services and support services in rural areas, including by ensuring their access to transportation and Internet, as well as their participation in decision-making processes regarding rural development; CEDAW/C/GBR/CO/R.8 12

(b) Review its policy on fracking and its impact on the rights of women and girls, and consider introducing a comprehensive and complete ban on fracking;

(c) Ensure the equal participation of rural women and girls in policymaking processes on disaster mitigation and climate change, in line with its general recommendation No. 37 (2018) on the gender-related dimensions of disaster risk reduction in the context of climate change.

The proposed position is in line with international Human Rights obligations, and this is a further reason to act urgently and to ensure that there is no delay to protect the environment and the population with the necessary legislation.

#### **4. Response to Consultation Questions**

*1. What is the name of your organisation?*

Women's Policy Group NI

*2. What is your email address?*

[elaine.croory@wrda.net](mailto:elaine.croory@wrda.net)

*3. Do you give permission for the name of your organisation to be released?*

Yes

*4. I am responding to this consultation as:*

A community organisation representative

*5. Where do you live or work?*

Other: the WPG is a collective organisation that consists of organisations based all over Northern Ireland

*6. Based on your response to (5) what best describes the area in which you live or work? Rural, Semi-Rural, Urban*

All of the above - the WPG has member organisations across NI

7. *Are you:*

Female

8. *Please select your age range:*

Respondent is 35-44, however the correct answer is all of the above, our members range from their early 20s to their 60s

9. *Do you agree with the assessment of the policy context and potential for onshore oil and gas resource in Northern Ireland?*

Yes.

The Women's Policy Group urges that action is taken as soon as possible to bring forward legislation to permanently ban exploration and extraction via legislation - both because it is the advice of experts and necessary to address climate change, and because it is clear from the overview provided in the consultation document that the direction of travel on these issues is not always linear. The situation in England, in particular, shows a moratorium on fracking that was reversed and then reversed again within a matter of a few months; this is an issue too important to be subject to the whims of political climate or bargained with for electoral advantage - it must be banned by legislation.

10. *Do you agree with the assessment of economic impacts of potential onshore oil and gas exploration and production in Northern Ireland?*

Yes.

The WPG agrees with the assessment that the economic benefits of any oil and gas resource that may exist in Northern Ireland is relatively low, with very limited scope for job creation. There is also a risk of potentially significant economic damage elsewhere in the economy, caused by harms that may arise from such exploration or extraction, including the cost of managing public health risks. This risk could undermine even the modest economic benefits that the current policy allows.

More fundamentally, it is our view that there is no feasible economic case to be made, even if significant oil and gas resources were present, that could override the environmental case for an immediate moratorium. This should therefore be followed by urgent legislation that would ban future exploration and extraction, to avoid the risk that, in the future, some may see the issue differently and fail to appreciate the

urgency of acting to prevent onshore exploration because of the social and environmental impacts.

*11. Do you agree with the assessment of the potential social and environmental impacts of onshore oil and gas exploration and production in Northern Ireland?*

Yes.

We appreciate that the Department has commissioned independent research to inform their position on this and we also appreciate the long-term view taken in terms of potential damage to the environment after exploration may have ended. This document is clear that the preferred option is one that not only avoids short term damage but that protects Northern Ireland in the longer term from environmental destruction.

*12. Do you agree with the preferred option for onshore petroleum licensing policy?*

Yes.

The WPG agrees that this is the correct direction of travel and we should impose an immediate moratorium, moving as swiftly as possible towards legislation to prohibit future exploration and production.

Our only caveat is that the word “eventual” places positive action on the long-finger. While a moratorium is welcome, we believe that legislation should be prepared so that the Minister can move this issue forward as swiftly as possible. As the situation in other jurisdictions has shown, moratoriums can be reversed too easily, while legislation is difficult to overturn. This issue is tied closely with the move towards Net Zero, with concerted effort to address climate change, and with that comes the necessity of considering that there are those who do not grasp the gravity of the situation that we face or who are opposed to efforts towards that end.

In addition, the Assembly has collapsed twice in the last seven years, and there is no guarantee that it will not collapse again. For these reasons, it is important that work begins on legislation that will ban onshore petroleum exploration and extraction as soon as possible.

*13. Do you think there are alternative options for onshore petroleum licensing policy in Northern Ireland which should be considered?*

The Women’s Policy Group believes that the correct option has been identified in the process of preparing this consultation.

Our only caveat is that action should be taken without delay to proceed towards legislation to permanently ban onshore oil and gas exploration.

## **5. Additional Comments**

To conclude, we welcome the work that has been carried out and we support the preferred policy position. Our only concern is that legislation to ban onshore exploration and extraction is not delayed any longer than is necessary to prepare the legislation.

*ENDS*

*For any questions or queries relating to this submission, please contact:*

- Elaine Crory, Women's Sector Lobbyist at WRDA: [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net) or
- Meghan Hoyt, Women's Sector Lobbyist Policy Assistant at WRDA: [meghan.hoyt@wrda.net](mailto:meghan.hoyt@wrda.net)