

Women's Policy Group NI

Department of Agriculture and Rural Affairs
Clare House
303 Airport Road West
Belfast BT3 9ED

31st July 2025

Re: Response to the Draft Third Northern Ireland Climate Change Adaptation Programme (NICCAP3)

Dear DAERA,

The WPG welcomes the opportunity to respond to this important Draft Programme. Unfortunately given capacity, we are unable to respond to the full consultation document. However, the WPG would like to submit our four key comments on the Climate Change Adaptation Programme.

1) The Programme displays excellent detail and an impressively comprehensive risk summary and action plan.

This is a very impressive document. The NICCAP3 is incredibly comprehensive and displays a deep understanding of the challenge of climate change mitigation. It is particularly heartening to see departmental responsibility being clearly assigned to specific actions, as well as partnership arrangements. Linking specific risks to specific actions is also very helpful and displays a welcome level of joined-up thinking.

2) The Programme is held back by a lack of intersectional gendered analysis.

The WPG was disappointed with the lack of engagement with how climate change mitigation will impact different populations differently. The scholarship is clear that climate change will impact the most vulnerable populations more

acutely (both locally and internationally).¹ Plans for climate change mitigation require a clear understanding of how gender, poverty, disability and racialisation intersect to create specific challenges for marginalised people, particularly around access to affordable food, housing and green spaces. The WPG has repeatedly argued² for an analysis of climate change that sees the struggle for gender justice as intimately connected to the struggle for a sustainable, livable future. Failure to recognise and address gender inequality in the context of developing sustainable policy runs the risk of “replicating gender inequality in any future green economy”.³

3) The Risk Assessment contains a concerning number of risks assessed as ‘more action needed’.

As mentioned, the WPG welcomes the clarity and detail contained within the risk assessment section of the Programme. However, we are also alarmed by the number of risks coded as ‘more action needed’. This suggests that the government has a considerable amount of work to do to protect Northern Ireland from the most egregious effects of climate change. We urge the Department to act with the urgency this situation requires.

4) Questions about the sustainability of the case study selected.

The WPG notes the Programme’s use of the work of Social Farms and Gardens as a case study showcasing best practice within the theme of Food Security. At the time of writing, Social Farms and Gardens is without funding. As such, Social Farms and Gardens can no longer operate, significantly hampering the continued development of the Community Garden network as it provided an information and resource hub for the sector. Similarly, successful community gardens such as GrowNI have also lost their funding and currently rely on donations to continue operations. The WPG is unsure why organisations that have been highlighted as examples of best practice could find themselves without funding. The

¹ See generally: Schwerhoff, G., & Konte, M. (2020) ‘Gender and Climate Change: Towards Comprehensive Policy Options’ in Konte, M. & Tirivayi, N. (eds.) *Women and Sustainable Human Development*. Springer Nature; Allwood, G. (2017) ‘Gender Mainstreaming and EU Climate Change Policy’ in MacRae, H. & Weiner, E. (eds) *Towards Gendering Institutionalism*. Bloomsbury; Alston, M. (2013) ‘Gender Mainstreaming and climate change’ *Women’s Studies International Forum* pp. 1 – 8;

² WPG (2025) ‘Response to Just Transition Commission Consultation’
<<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/678934dc9d785961d91e74f6/1737045212996/WPG+Response+to+Just+Transition+Commission+consultation.pdf>> WPG (2024) ‘Rethinking our Resources’

<<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/67868f9ea995056c463b87a5/1736871838889/WPG+NI+Response+to+Rethinking+Our+Resources+%281%29.pdf>> WPG (2021) ‘Submission on the Climate Change Bill’
<<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/6710ea62b86fa45e9a0cdd15/1729161827364/Womens-Policy-Group-Evidence-Submission-on-Climate-Change-Bill-6th-July-2021.pdf>>

³ Mellor, M. (2006) ‘Ecofeminist Political Economy’ *International Journal of Green Economics*.

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Department must show a commitment to local, community resilience by properly resourcing these organisations.

ENDS

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

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