



Submission on Developing a Regulatory Framework for Offshore Renewable Energy

Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wāhine o Aotearoa (NCWNZ) is an umbrella group representing around 60 affiliated organisations and 200 individual members. Collectively our reach is over 200,000 with many of our membership organisations representing all genders. NCWNZ has 13 branches across the country.
2. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
3. This submission has been prepared by NCWNZ through the Parliamentary Watch Committee and Climate Change and Environmental Sustainability Hub. It draws from several decades of NCWNZ policy¹ and submissions² on issues endorsed by the membership, including the impacts of climate change.
4. NCWNZ supports the Aotearoa New Zealand commitment to the Sustainable Development Goals including SDG 13: Take urgent action to combat climate change and its impacts³; and progress against the observations and recommendations of Committee on the Elimination of Discrimination against Women (CEDAW)⁴.

¹ [Resolutions - National Council of Women of New Zealand \(ncwnz.org.nz\)](https://www.ncwnz.org.nz/resolutions)

² <https://www.ncwnz.org.nz/submissions>

³ [Goal 13 | Department of Economic and Social Affairs \(un.org\)](https://www.un.org/sustainabledevelopment/goal-13-climate-action/)

⁴ [Committee on the Elimination of Discrimination against Women | OHCHR](https://www.ohchr.org/en/instruments-treaties)

Chapter 7: Māori Rights and Interests and Enabling Iwi and Hapū involvement

Question 14: Is there anything you would like us to consider as we engage with iwi and hapū on Māori involvement in the permitting regime?

- The involvement of iwi, hapū and whanau is critical to the process and outcome of the regime. The implementation of the principles of te Tiriti o Waitangi, and an understanding of Papatūānuku provide a foundation for such critical work, as does the recognition of the partnership between natural resources and human lives in such work. The integration of mātauranga Māori and te ao Māori principles must be central to planning, implementation, and ongoing assessment and evaluation. Development of additional sources of energy, which this proposes, is critical for the implementation of Te Tiriti, women's rights and participation, children's education, food and fuel, and transport.

Question 15: Have we identified the key design opportunities to work collaboratively with iwi and hapū alongside consultation? Is there anything we have missed?

- The rights and interests of Māori must be respected, together with acknowledging the impacts of colonisation and recognising that those with low incomes and vulnerable households are disproportionately affected by the impacts of climate change.

Question 16: Are there any Māori groups we should engage with (who may not have already engaged)?

- The Māori Women's Welfare league.

Chapter 10: Decommissioning

Question 33: Are there any other ways in which the regulatory regime could encourage the refurbishment of infrastructure or the recycling of materials?

- The National Council of Women believes every viable effort should be made to ensure recycling of materials and refurbishment.

Question 34: Should offshore renewable energy projects applying for a consent to decommission be required to provide a detailed decommissioning plan related to environmental effects for approval by consent authorities? If not, why not?

- Yes.

Chapter 12: Other regulatory matters

Question 38: Should there be an opportunity for public submissions on the commercial permitting decision? What would this capture that the environmental consent decision does not? If not, why not?

- Yes. There should be effective mechanisms in place for community input, assessment and involvement in decision making. The public live with the results of the decisions at every level and too often are not fully aware of risks, health and safety issues or impacts at community and local level as well as more broadly.

General Comments

- The National Council of Women of New Zealand urges the government, private sector entities, civil society, communities and whanau to develop further initiatives to prepare New Zealand for the increasing impacts of climate change and transitioning to a climate resilient future and increasing adaptation. The development of offshore energy can be central to this, provided there is genuine and effective consultation and a sound regulatory framework, and robust integration of health and safety and environmental impacts.
- This proposal should increase risk reduction, and the wellbeing of family, and present and future generations. As we have seen in the Pacific, and elsewhere, women are disproportionately affected by the impacts of climate change as they carry much of the responsibility for the wellbeing of families, for ensuring families have fuel and food, and for managing many of the existing challenges related to health and disability.
- Decision makers should be engaged in developing, implementing and assessing strategies such as this, as it is clear that the meaningful participation of women can increase effectiveness and equality of outcomes.
- Recent climate events have clearly demonstrated the importance of access to affordable energy. Energy is required for food and heating, so impacting on wellbeing, children's health and access to education at school and at home, and their ability to react to crises.
- It is critically important to involve women in planning, ongoing assessment and monitoring of potential developments, resilience and risk reduction, all of which are integral to this proposal. Often women do not have sufficient access to funds to ensure the most effective and efficient forms of energy.
- The **Gender Action Plan 15 developed at COP25** stresses the importance of women's inclusion and gender equality, and that they must be included in strategic planning and decision making and this is important for major initiatives such as those scoped in this paper, as well as those at the family and local level.

- With advancing climate change, families will be affected by heat, storms, financial insecurity and costs, and their ability to pay for energy to cool or heat homes, and availability to have energy for public and private transport will vary.

- In line with this, NCWNZ would also draw attention to the commitment New Zealand has made to Goal 13 of the **UN Sustainable Development Goals: Climate Action**

13.1 Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries and

13.2 Integrate climate change measures into national policies, strategies and planning

- The **CEDAW UN Concluding Observations and recommendations 2018:**

*41d) Climate change has a disproportionate effect on women in the State party on policies and programmes and **there is a lack of information on the participation of women in decision-making on policies and programmes concerning rural development***

42d) Recommends the State party:

Take into account the greater vulnerability of women in the face of natural disasters and climate change at all decision making levels of the adaptation process

Conclusion

- While New Zealand is 4th in the OECD for the proportion of energy from renewable sources, our energy system is responsible for approximately 40% of our greenhouse gas emissions and this must reduce substantially. This proposal can play a critical part in this.
- It is critical that any energy strategy and regulatory framework specifically includes women and Māori in consultation, planning, delivery and monitoring.