

FEMINIST FOREST FRAMEWORKS

Why gender matters for Dutch forest and biodiversity policy



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A Collaborative Forest Management women's group collecting fuelwood in Budongo forest reserve, Uganda.

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Ministry of Foreign Affairs of the
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Glossary

BHOS:	International Trade and Development Cooperation (from Dutch: Buitenlandse Handel en Ontwikkelingssamenwerking)
BZ:	Ministry of Foreign Affairs (from Dutch: Ministerie van Buitenlandse Zaken)
CBD:	Convention on Biological Diversity
CEDAW:	Convention on the Elimination of All Forms of Discrimination Against Women
COP:	Conference Of the Parties
EU:	European Union
FPIC:	Free Prior and Informed Consent
GAP:	Gender Action Plan
GBF:	Global Biodiversity Framework
GCF:	Green Climate Fund
GD:	Green Deal
GEF:	Global Environment Facility
GFC:	Global Forest Coalition
GHG:	Greenhouse gas emissions
GLA:	Green Livelihoods Alliance
IATI:	International Aid Transparency Initiative
ICCAs:	Indigenous Peoples' and Community Conserved territories and Areas
IGG:	Directorate Inclusive Green Growth (from Dutch: Inclusieve Groene Groei)
IMVO:	Responsible International Business Conduct (from Dutch: Internationaal Maatschappelijk Verantwoord Ondernemen)
IPLCs:	Indigenous Peoples and Local Communities
LNV:	Ministry of Agriculture, Nature and Food Quality (from Dutch: Ministerie van Landbouw, Natuur en Voedselkwaliteit)
Nbs:	Nature-based Solutions
OECD-DAC:	Organisation for Economic Cooperation and Development - Development Assistance Committee
RED:	Renewable Energy Directive
SDGs:	Sustainable Development Goals
WECF:	Women Engage for a Common Future
(W)EHRDs:	(Women) Environmental Human Rights Defenders
UNDRIP:	United Nations Declaration on the Rights of Indigenous Peoples
UNDROP:	United Nations Declaration on the Rights of Peasants
UNEA:	United Nations Environmental Assembly
UNFCCC:	United Nations Framework Convention on Climate Change

Definitions

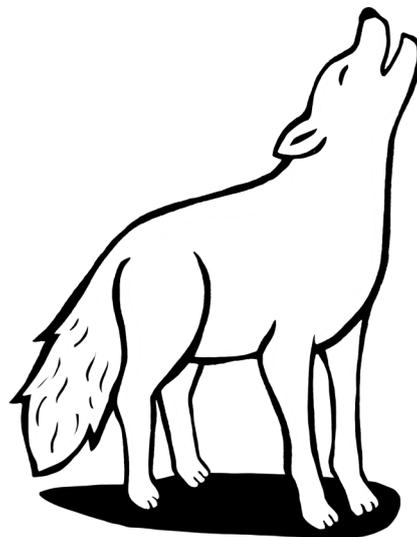
Throughout the document, we refer to the integration of gender considerations using terms such as 'gender-blind' or 'gender-transformative'. We recognise that such terms can be subjective, and therefore provide below a definition of how we understand them in the context of this briefing.

Gender-blind: the policy or programme makes no reference to women and/or gender-differentiated impacts.

Gender-sensitive/gender-aware: the policy or programme includes references to gender inequalities and differentiated impacts, but misses concrete actions and strategies to address them.

Gender-responsive: the policy or programme promotes inclusive governance while acknowledging and paying explicit attention to power imbalances, including specific actions to try and reduce gender inequality.

Gender-transformative: the policy or programme explicitly seeks to address historical root causes of inequality, such as gender roles, norms, and behaviour, and challenges the root causes of gender inequality. Attention is paid to intersectionality.



Executive Summary

According to the United Nations¹, forest ecosystems and the biodiversity they host sustain the livelihoods of some 1.6 billion people worldwide and are home to 80% of all known terrestrial fauna and flora species. The intertwined crises of biodiversity loss, deforestation and ecosystem degradation are increasing at alarming rates, with devastating consequences for both people and planet. Looking beyond consequences, there is a growing awareness of the role people can play in reversing these trends and sustainably protecting and governing natural landscapes. **However, we find that too little (mainstream)² attention is yet being paid to gender-differentiated issues.** Often because of underlying gender inequalities, women (and girls) in all their diversity³ tend to use forests and biodiversity differently; are less likely to have secure land tenure rights; are under-represented in governance; face specific gendered threats as women environmental and human rights defenders ((W)EHRDs); and have less access to or control over natural resources. However, **far from being passive victims, women are key agents of change in sustainably protecting and conserving forest ecosystems.** Growing evidence exists that **women’s meaningful participation in forest governance has “significant positive effects”⁴, though we emphasise that gender equality must be seen as a goal in its own right** beyond any instrumental value it may have for other objectives.

Since the Netherlands is an actor with a strong history of gender advocacy in the EU and global policy arenas, WECF has conducted a feminist analysis of key forest and biodiversity policies, regulations, and strategies of the Dutch government, plus policies and agreements in which the Netherlands is engaged at the EU and international level. Taken at face value, we found that **most Dutch and EU policy documents are still gender-blind or, at most, gender-sensitive.** Even if references are made to gendered dimensions – and this is not always the case – they are not backed up by concrete strategies, goals, and actions to address structural inequalities, intersectionality, or promote the meaningful participation of women in decision-making and governance. More encouraging is **Dutch programming** – financial support to non-governmental

1. United Nations. **SDG 15: Life on Land. Forests, desertification and biodiversity**

2. We refer here primarily to political and institutional attention. We do not wish to obscure that some scholarship on the nexus of gender and forests/biodiversity goes back decades (see for example CGIAR, 2017, ‘**30 years of gender and forests**’)

3. When we refer to ‘women’ in this document, this should be understood as ‘women in all their diversity’ and girls where this is appropriate. WECF is committed to an intersectional approach, which recognises the diverse intersecting identities which influence people’s experience of the world. Examples include gender, age, race/ethnicity, Indigenous status, sexual orientation, caste and class, geographical location, religion, disability, legal status and many more. While we do not wish to reproduce gender binaries, and recognise that people of diverse gender identities may have different needs and experiences, the lack of gender-disaggregated data for women and men, let alone other genders, means we cannot include this in the analysis.

4. FAO, 2022. **The State of the World’s Forests 2022.** Forest pathways for green recovery and building inclusive, resilient and sustainable economies. Chapter 5.6.

activities – which **can be described as gender-sensitive to gender-responsive**. All project proposals are expected to meet a set of gender criteria, and in 2019 almost 87% of funding for agriculture, forestry and fisheries was designated as having a gender objective. Attention is paid to the importance of conducting a gender analysis, inclusion of gender in target setting, and whether activities align with the Ministry's vision on gender equality. While this is a good start, it often seems that much of the focus is on women's economic empowerment and access to livelihoods. It is **crucial for policy and programmes to facilitate women's enjoyment of their full political, social and economic rights**, with a particular emphasis on meaningful participation in decision-making. **At the EU level, forest and biodiversity strategies and legislations are mostly gender-blind**. The EU has a Gender Strategy and the Gender Action Plan (III) in place but we find that these are not being significantly mainstreamed. Many international agreements mainstream gender more meaningfully. However, given that implementation should take place at the national level, it is imperative that national policies incorporate a strong gender lens from their inception.

The key overarching recommendations for decision- and policy-makers to ensure that forest and biodiversity strategies do not inadvertently perpetuate gender inequality but instead empower women and lead to inclusive and gender-responsive forest and biodiversity governance are:

- Meaningfully involve a diverse group of (IPLC) women, girls and gender-diverse people in the development and implementation of forest and biodiversity policies, frameworks and programmes. They must be seen as agents of change rather than passive victims.
- Ensure that forest and biodiversity policies, as well as other interlinked policy frameworks and legislations, align with existing gender policy frameworks and action plans;
- Increase efforts and capacity to bridge the identified gap in terms of gender-disaggregated data on the intersection of gender, forests and biodiversity;
- Formulate and implement ambitious, clear and concrete strategies to mainstream gender in policy and programmes at different governance levels in a transparent manner;
- Ensure equal access to resources and opportunities for the social, political and economic empowerment of women and girls;
- Adopt strong due diligence regulations to ensure that neither Dutch public money nor activities of Netherlands-based companies negatively impact women;
- Advocate for specific gender goals, targets, actions and indicators in all forest and biodiversity policies, strategies, and regulations (e.g. standalone gender target in the post-2020 Global Biodiversity Framework)

The report is structured as follows:

-  Section 1 - introduction and context
-  Section 2 - analysis of the relevant forest and biodiversity policies, strategies, and agreements
 - 2.1 - Dutch policies and strategies of international and national relevance
 - 2.2 - EU policies, strategies, and agreements, alongside two international policy frameworks and initiatives currently under negotiation
-  Section 3 - recommendations and conclusions for decision and policy-makers to develop and advocate for gender-responsive forest and biodiversity policies





1. INTRODUCTION:

why gender matters for forest and biodiversity policy-making

Forest ecosystems cover nearly one third of the land surface and they are crucial to maintaining a healthy planet and to sustaining the livelihoods of some 1.6 billion people worldwide⁵. They are home to 80% of all known terrestrial species, play a key role in climate change mitigation and adaptation, provide food and medicines, reduce soil erosion, replenish water sources, contribute to reducing air pollution, and hold cultural and spiritual value⁶.

In Europe, forests cover about 35% of the total land area which accounts for approximately 227 million ha⁷ but the distribution between countries is highly unequal. In the Netherlands, forests represent approximately 10% of the land cover. Although there are differences among regions, **there is a clear global trend in sustained deforestation and forest degradation**. This is a significant contributing factor to climate change and biodiversity loss, and human actions under the prevailing socio-economic systems are leading to the extinction of more species than ever before. Biodiversity loss and ecosystem degradation continue to take place in the EU at an alarmingly high rate: unless urgent action is taken, around 1 million species will face extinction⁸. Currently, only 23% of species and 16% of habitats under the EU Nature Directives are in good health in Europe, and 26.68% and 11.54% respectively in the Netherlands⁹.

Agricultural expansion, intensive and large-scale commodity production, animal feedstock and unsustainable livestock production, and demand for wood fuel are some of the main drivers of deforestation, forest degradation and biodiversity loss worldwide and thus, climate change. In Europe, **consumption of forest-risk commodities** (e.g. soy, palm oil, beef, leather and cocoa) **is one of the main drivers of 'imported deforestation'** caused by the expansion of agricultural land in tropical forests and non-forest ecosystems such as biodiverse grasslands and wetlands. Europe is the second biggest importer of deforestation after China: between 2005 and 2017, the largest EU economies, including the Netherlands, were responsible for 80% of the EU's imported deforestation¹⁰.

5. FAO and UNEP. 2020. **The State of the World's Forests 2020**. Forests, biodiversity, and people.

6. FAO, 2022. **The State of the World's Forests 2022**. Forest pathways for green recovery and building inclusive, resilient and sustainable economies.

7. Forest Europe, 2020. State of Europe's Forests 2020

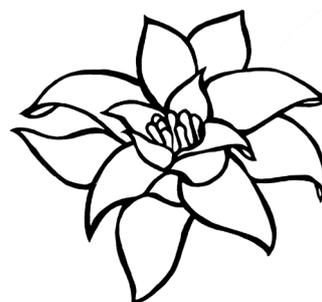
8. IPBES, 2019. **Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services**. E. S. Brondizio, J. Settele, S. Díaz, and H.T. Ngo (editors). IPBES secretariat, Bonn, Germany.

9. **Biodiversity Information System for Europe**, Country, Netherlands

10. World Wildlife Fund (WWF), 2021. **Stepping up? The continuing impact of EU consumption on nature worldwide'** Wedeux, B. & Schulmeister-Oldenhove, Anke.

It is well documented how **women around the world, in particular Indigenous and rural women, are more susceptible to the impacts of environmental and ecosystems degradation, deforestation, biodiversity loss and climate change**, as well as to extreme climate events¹¹. Gendered differences in natural resources management coupled with, for example, unequal land tenure rights, leave many women particularly vulnerable to the effects of deforestation and biodiversity loss.

Women disproportionately bear the consequences of systems based on ever-increasing growth, and concentration of economic and political power in the hands of already privileged groups. We consider that the **current socio-economic systems are rooted in and reproduce social injustices and inequalities**, with too little attention paid to gendered matters such as unpaid care and domestic work, and limited access to land and other natural resources¹². Global gender gaps on issues including poverty, water, governance, food, literacy and land, are exacerbated by climate change impacts such as crop failure and water scarcity¹³. For instance, as forests are depleted and fresh water supplies exhausted, it is women and girls who travel farther to collect firewood and water for their communities¹⁴. This leads to, among other things, less time to attend school, and puts women at greater risk of sexual assault and harassment¹⁵.



11. See for instance: Synthesis report (2022): **'Dimensions and examples of the gender-differentiated impacts of climate change, the role of women as agents of change and opportunities for women'**, UNFCCC Secretariat ; IPCC, 2022: **Climate Change 2022: Impacts, Adaptation, and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change** [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. In Press.; **Addressing Gender Issues and Actions in Biodiversity Objectives; Gender justice and climate action: A feminist analysis of forest and climate policy-making**(2021), Global Forest Coalition (GFC); Neumayer, E. and Plümper, T. (2007): 'The gendered nature of natural disasters: The impacts of catastrophic events on the gender gap in life expectancy, 1981-2002', *Annals of the Association of American Geographers* 97(3): 551-566.
12. **ActionAid, 2021. Unpaid care and domestic work: a glance to guiding principles and minimum standards**
13. Women's Environment and Development Organisation (WEDO), 2016. Background Paper: **Gender Mainstreaming Practices in the Context of Climate Responses**
14. Reuters, 2020. **Climate woes growing for women, hit worst by displacement and migration'**
15. World Rainforest Movement, 2021. **Resistance in the face of multiple tactics to expand monocultures**

While on one hand it is vital to address the serious gender-differentiated impacts, we must also **recognise and value women's solutions and knowledge**. Women often hold unique traditional knowledge that supports the protection of forests and biodiversity worldwide, and they are key agents of change in the transition to more resilient and sustainable pathways. They play a crucial role in the sustainable use and governance of natural resources, and in ensuring the conservation and restoration of key biodiverse ecosystems globally¹⁷. There is also **growing evidence that women's meaningful participation in forest governance and biodiversity conservation has "significant positive effects"**¹⁸, though gender equality must be seen as a goal in its own right beyond any instrumental value it may have for other objectives.

Yet **women are often 'missing from the table'** where priorities are set, solutions are identified and resources are allocated. This under-representation results in the development of forest and biodiversity conservation policies, and climate mitigation and adaptation strategies, that are totally gender-blind, resulting in increasing inequalities and posing an obstacle to effective solutions¹⁹. **If policies fail to address existing structural inequalities, they will inevitably fail to deal with the uneven distribution of access to and control over resources** based on gender, class, race, caste, age and ability, and other forms of discrimination²⁰. As a result, they will maintain and reinforce an unjust system of intersecting forms of oppression.

Little is written from a feminist perspective on the most recent forest and biodiversity policy frameworks at the Netherlands and EU level, and with this briefing we hope to contribute to bridge this gap. Our objective is to analyse the gender-responsiveness of key forest and biodiversity policies, regulations and strategies in the Netherlands, EU and, to a more limited extent, internationally. We put forward recommendations for decision- and policy-makers to ensure that policies and regulations become (more) gender-responsive. Once a certain level of responsiveness has been reached, we encourage moving even further towards gender-transformative change.

16. Global Forest Coalition, 2014. **'Forest, biodiversity, and rural and indigenous women's rights'**

17. See for example, Economic Commission for Latin America and the Caribbean, 2021. **'Implications of gender roles in natural resource governance in Latin America and the Caribbean'**

18. FAO, 2022. **The State of the World's Forests 2022. Forest pathways for green recovery and building inclusive, resilient and sustainable economies. Chapter 5.6.**

19. For instance, in the United Nations Framework Convention on Climate Change (UNFCCC), the percentage of women across all national delegations was 38% in 2021, which is just an 8% increase since 2009. In the EU the composition of the members of parliament/assembly, including the president is 430 men and 275 women, and in the Netherlands national parliament (both houses), **there are 64,3% men and 35,7% women.**

20. Global Forest Coalition, 2021. **Gender justice and climate action: A feminist analysis of forest and climate policy-making**

The methods used for the briefing consisted of: mapping of relevant Dutch, EU and international forest and biodiversity policies; a literature review; a total of three interviews with Dutch government representatives from the Ministry of Foreign Affairs (BZ). While the policy brief is primarily directed towards BZ, we are aware that the Ministry of Agriculture, Nature and Food Quality (LNV) also plays a significant role in the national implementation of international frameworks. We acknowledge the limitation that LNV has not yet been consulted, but we intend to engage them in the ongoing dialogue with stakeholders across the Dutch government. For the analysis we used a feminist methodology previously developed by WECF/GFC members and allies. This methodology (see Annex I) was slightly adapted to the scope of this briefing and helped to assess climate, forest, and biodiversity policies through a gender lens, emphasising the needs and roles of women in all their diversity as rights-holders and agents of change. It consists of a set of guiding questions that focus on impacts, benefits derived from implementation and consultation, and decisions-making processes.





2. Gender-responsiveness of forest and biodiversity policy frameworks

In this section we analyse forest and biodiversity policy frameworks at different governance levels, with an emphasis on the Netherlands and the EU. We acknowledge that this is not an exhaustive analysis. While the focus is on forest and biodiversity strategies, we have nevertheless considered other closely linked policy frameworks such as the EU Nature Restoration Law, and the links between EU Biodiversity Strategy and the post-2020 Global Biodiversity Framework (GBF) under the Convention on Biological Diversity (CBD).

As an EU Member State, the Netherlands plays a role both in shaping and implementing EU policies and regulations. It further engages in various international climate, forest, and biodiversity policy-making, and **can influence and formulate policies and frameworks at different governance levels**. Policy frameworks adopted at the UN and EU levels in turn apply to all Parties and Member States. It was therefore considered appropriate to include policies from different governance levels because of their implications for the Netherlands, and also to highlight the role that the Netherlands can play in advocating for gender-responsive - and ideally transformative - change at all levels.

2.1. Forest and biodiversity policies and frameworks in the Netherlands

It is first important to recognise **the Netherlands' history as a strong advocate for women's rights and gender equality** in the various policy processes it engages in. We are encouraged by the forthcoming development of feminist foreign policy²¹, and hope that this translates to a stronger gender lens being adopted in the international forest and biodiversity approach. It is very positive to see an explicit mention of **working towards gender-transformative change** on the gender development cooperation results page²², and **recognition of the need for local ownership** and 'leading from the South'. We further commend that *"as co-lead of the Action Coalition on Feminist Movements and Leadership, the Netherlands pressed at the Generation Equality Forums for more political and financial support for women's rights organisations in the South"*²³.

21 Rijksoverheid, 2022. **Kamerbrief over vraag van Eerste Kamer naar toegevoegde waarde van feministisch buitenlandbeleid voor Nederland**

22. Ministry of Foreign Affairs. **Women's Rights and Gender Equality**

23. Ibid.

The Ministry of Foreign Affairs (BZ), particularly the Directorate for Inclusive Green Growth (IGG), is one of the key actors for negotiating and implementing Dutch international climate & biodiversity commitments. Positively, **BZ has committed to gender mainstreaming** throughout its work. However, and as the IOB evaluation on gender mainstreaming²⁴ also states, we find that there is still room to improve, particularly concerning the work on the intersection of gender, climate, forests and biodiversity. We get a sense that the strategies for these are sometimes still being developed in silos. While we recognise the positive role of Dutch policy-makers on advocating for gender in broader climate discussions, and acknowledge that much of the advocacy may happen behind closed doors, from an analysis of the available documents this approach is not immediately visible in the forest and biodiversity policy discussions.

There are two key policy documents (letters to parliament) which outline the Dutch government's approach to international forest and biodiversity management. Since both documents were published in 2020, prior to the new coalition accord and cabinet formation in 2021, it cannot be assumed that they represent the most up-to-date positions of the relevant ministries (Ministry of Foreign Affairs and the Ministry of Agriculture, Nature and Food Quality). However, as of September 2022, no further equivalent documents have been published, and few other written policy documents exist which directly concern the Netherlands' international forest and biodiversity policies.

The letter to parliament regarding the international effort for forest conservation and restoration²⁵ gives an overview of the Dutch government's approach to tackling deforestation and forest degradation. Encouragingly, there is a recognition that **deforestation and forest degradation not only have serious implications for the climate but also for communities who live in and depend on forests** for their livelihoods. Indigenous people and other "most vulnerable" groups are highlighted, but women are not mentioned. Despite referring to topics which have gendered dimensions, such as the risks faced by environmental and human rights defenders (EHRDs)²⁶, there is only one reference in the document to "including women".

This reference **lacks any concrete proposal for a strategy to ensure that women are meaningfully included** in forest conservation, restoration, and management. While five points are laid out regarding the Netherlands' intended approach, none of

24. Ministry of Foreign Affairs, 2021. **Gender mainstreaming in the Dutch Ministry of Foreign Affairs: beyond 'add women and stir'?** Egmond, M.,C. & Nooijer, P. Ministerie van Buitenlandse Zaken, Nederland

25. Rijksoverheid, 2020. **Kamerbrief over de internationale inzet voor bosbehoud en bosherstel**

26. See for example Association for Women's Rights in Development (AWID), 2017. **Women Human Rights Defenders confronting extractive industries**

these give any indication of how women and gender issues will be integrated. There is reference to supporting multi-stakeholder initiatives; ideally this would recognise the need to consult and meaningfully involve local women but this is not mentioned. Despite noting the need to support developing countries, not only with an emphasis on forests themselves but also on the living conditions of local communities “including women”, there is no detail about how this would be achieved or what role the women themselves could play. We **miss a serious recognition of women’s agency and role as agents of change** in their own lives or in maintaining sustainable forest landscapes. This must become a key tenet of Dutch policy.

Despite noting an ambition to create a ‘nature-inclusive society’, the letter to parliament about the programme to strengthen biodiversity²⁷ is gender-blind, and positions human life as currently mostly harmful for biodiversity. While it is mentioned that biodiversity in our surroundings has value for humans, there is **hardly a recognition of the interconnection between people and other living beings, nor the knowledge systems that many communities hold about protecting and respecting other species**. One of the key aspects of the document, which has implications for forest-dependent communities including women worldwide, is the recognition of the need to reduce the Netherlands’ ecological footprint. When it comes to Dutch impact abroad, the import of commodities linked to deforestation and forest degradation often have gendered impacts, yet this is not addressed.

Closer to home, it can be further argued that **the ecological footprint of individuals in the Netherlands and the EU sometimes differ by gender**. In some aspects, evidence suggests that women use less resources and are more committed to behaviours that reduce their impact²⁸. Agriculture is one of the sectors to be addressed, and we agree that large-scale industrial agriculture is a key component of forest and biodiversity loss. Yet it should be better noted **that small-scale and agroecology approaches and practices (often practised by women smallholders) can actually have a positive impact on biodiversity** and genetic resources. As noted in the policy brief, it is necessary to address energy, but here we miss any reference to women’s role in the energy transition, either at home or abroad. Missing too is a recognition of gendered uses of energy – often for domestic tasks – and women’s higher risk of energy poverty²⁹. As clearly stated in the document, “biodiversity has to do with all aspects of our society”. A true recognition of this means exploring and addressing the gendered dimensions.

27. Rijksoverheid, 2020. [Kamerbrief over programma versterken biodiversiteit](#)

28. Some examples of gendered differences in the fields of transport and agriculture, for example, can be found in European Environmental Bureau and WECF, 2021. [Why the EU Green Deal Needs Ecofeminism](#)

29. International Energy Agency, 2018. [Tracking gender and the clean energy transition](#)

In the context of the broader Dutch approach to development cooperation, another relevant document is the Theory of Change – Climate by the Ministry of Foreign Affairs³⁰. One section in the TOC Climate is concerned with forests, and we note that the Dutch government strives towards “inclusive deforestation free trade chains” and is also cognisant of the importance of healthy forests for local communities’ resilience to climate change effects. We see a promising start in the reference to improving the lives of local communities, with “special attention to women”, yet it is notable that throughout the whole document, **women and girls are only referenced in relation to being vulnerable, poor and at risk** of climate change consequences. While we do not refute that it is vital to look at the gender-differentiated impacts of the climate and biodiversity crises, **policy-makers must explicitly acknowledge and address the underlying inequalities that make women vulnerable**. It is vital that the proposed commitment to a multi-stakeholder approach with the involvement of local communities is careful to meaningfully include women.

While the written policies regarding forests and biodiversity are mostly gender-blind, we are more encouraged by the gender approach taken in programming. **An analysis of a selection of activities funded by BZ highlights that attention is being paid to the gender and forests/biodiversity nexus**. It appears that all activity proposals are appraised according to a set of criteria which includes some specific gender considerations³¹. Assessment is made of an activity’s relevance to BZ policy priorities, including gender, and whether it aligns with cross-cutting themes such as women’s rights. The applicant must outline whether they have conducted a stakeholder analysis, including women and youth. Further, it is noted whether gender dimensions are factored into the outcomes, outputs and activities, and specific attention to women and gender is seen as being of ‘added value’ to the activity. Programme theories of change, indicators and targets are positively marked if they are formulated with attention to gender.

Placing emphasis on gender-sensitive to gender-responsive activities is a positive start, yet there are some limitations. Within the activities currently funded, there seems to be a strong focus on women’s economic empowerment. While this does not prevent a programme from being gender-responsive, and access to financial resources can enable women to access their other rights, **it is vital that empowerment is considered as a holistic bundle**. This could include, but is not limited to: meaningful participation in decision-making, rights to information, training, representation, and access to resources. While gender analyses have mostly been conducted, **gender equality often still seems to be premised on a rather narrow definition of financial and livelihood support**. Concerning Dutch contributions to

30. Rijksoverheid, 2018. [Theory of Change – Klimaat](#)

31. The appraisal documents and the marking criteria can be accessed in the individual activity reports on the NL Ontwikkelingssamenwerking portal. For example, [Dutch Sino Bamboo programme](#) or [Working Landscapes initiative](#)

multilateral funds such as the Global Environment Facility (GEF) and Green Climate Fund (GCF) – which are highlighted in the letter to parliament on international forest efforts – it is not immediately clear whether the Netherlands earmarks any budget for gender-responsive (forest) activities. Nevertheless, in the appraisal documents for these contributions, we are pleased to see that the Netherlands actively advocates for more gender-responsiveness in these spaces, for example pushing for a gender strategy in the GCF.

The Organisation for Economic Cooperation and Development – Development Assistance Committee (OECD-DAC) gender marker, used to screen whether climate finance also includes gender equality as a ‘primary’, ‘significant’ or ‘not targeted’ objective, appears to be used for all Ministry of Foreign Affairs project appraisals. It is noteworthy that **funding for agriculture, forestry and fisheries scores higher than the average for other climate sub-sectors**. While the percentages varied over the years, in 2019 86.6% of funding was assessed to have gender equality as an objective. Yet, the IOB evaluation notes that this gender marker is applied at the planning phase of programmes and often has little follow up in reporting and evaluation, so it is hard to assess whether these gender ambitions are followed through.

As noted in the previous paragraphs, focusing on women as beneficiaries or solely on their economic empowerment raises some **questions about how and when gender equality is marked as a significant or principal objective**. While there is a handbook on proper application of the gender marker³², which sets out the criteria for gender equality funding, an Oxfam analysis of several donors has highlighted that these criteria are often not met. We particularly wish to highlight one of their conclusions that “gender equality projects must do more than focus on women as recipients of services [...] Donors must ensure that women’s leadership and participation through all phases of projects are core components in all gender equality or gender-mainstreamed projects”³³.

The challenge of measuring whether BZ-funded programmes are reaching their gender objectives is highlighted by the fact that there is **no gender-disaggregated data visible** in the dedicated forest section of the development cooperation website results page. Clear progress has been made in supporting forest-dependent communities, with the “number of people in forest landscape receiving direct support from programmes for sustainable agriculture, sustainable forestry and better livelihoods” more than tripling from 55,738 in 2018 to 173,264 in 2021³⁴. With such precise data, it is unusual that no breakdown of the gender and/or age of beneficiaries has

32. OECD DAC Gendernet, 2016. [Handbook on the OECD DAC Gender Equality Policy Marker](#)

33. We recommend consulting the full analysis at Oxfam, 2020. [Are They Really Gender Equality Projects? An examination of donors’ gender-mainstreamed and gender-equality focused projects to assess the quality of gender-marked projects](#)

34. Ministry of Foreign Affairs, 2021. Results – [Forests NL Ontwikkelingssamenwerking](#)

been provided. While specific data may be available in programme reports (visible on the d-portal platform³⁵ designed to explore International Aid Transparency Initiative (IATI) data) it would be more transparent to have some collated data clearly visible and easily accessible.

In the policy letter on international forest conservation, there is an upfront commitment to doubling the annual budget for forest and land issues to EUR 25 million. It is challenging to accurately assess whether this commitment is being met, since forest and land issues are not separate thematic areas in climate finance reporting. It is included in the sector 'agriculture, forestry and fisheries', yet not all activities with a focus on forests are categorised in this sector. In addition, it is not clear how this budget will be allocated (i.e. whether it will largely be channelled through multilateral institutions, bilateral financing, development banks or (international) civil society programmes) nor whether it will be accessible to local communities, including women and women's groups. The issue of **gender-responsive finance is key to ensuring that policies lead to just and equitable change**, however the amount of climate finance which seeks to address gender inequality still leaves much to be desired. In a shadow report from 2020, Oxfam identified that only 1.5% of climate ODA had gender as a principal objective, 34% as a significant objective, and nearly equal parts were either not significant (32.5%) or not marked (32%). Very few climate finance instruments have a requirement to report on how much is allocated to locally-led actions, but in 2017 the IIED estimated that only approximately 10% of climate finance 'reached' the local level³⁶. It is important to note that this does not imply that local organisations directly received the funding.

We note that many of the BZ-funded activities are led by multilateral institutions or large Global North-based NGOs. **Seemingly little funding is directly earmarked for and accessible to Global South-based grassroots women's initiatives.** On the website for reporting results of development cooperation, while there is information about the budgets allocated for gender equality and climate change (including forests) separately, it is not immediately possible to see whether there is any overlap or intersection between these two thematic areas. It appears that activities funded by BZ are categorised by only one sector (e.g. forestry development) which makes it impossible to filter for activities which include both forests/biodiversity and gender as objectives. At a glance, it does not appear that any funding goes to developing country-based NGO groups working on forest sectors, although we do note that not all activities with a focus on forests appear to be categorised as such. For example, the Green Livelihoods Alliance (GLA) 'Forests for a Just Future' programme is reported under 'democratic participation and civil society' - while this is not incorrect, the fact that forest-related activities are reported under many different sectors makes it challenging to gain a full picture without individually assessing each activity.

35. D-Portal Netherlands Ministry of Foreign Affairs

36. IIED, 2017. **Delivering real change: getting international climate finance to the local level.** Soanes, M., Rai, N., Steele, P., Shakya, C., and Macgregor, J.

At the national level, the Dutch government's policy framework for nature and biodiversity protection is quite comprehensive and covers a series of standards and guidelines. However, **the Forest Strategy to 2030, the Netherlands Nature Positive ambition document³⁷, and the Nature Conservation Act³⁸, are entirely gender-blind.** While the context in the Netherlands differs in some ways to the countries most impacted by (tropical) forest loss and degradation, it is nevertheless important to investigate any potential gendered dimensions, and recognise the different ways that people of different genders interact with their environment.

The national Forest Strategy to 2030³⁹, which is connected to the EU Biodiversity Strategy, details the government's ambitions for forests in the Netherlands to meet various objectives, including commitments to (international) nature and climate agreements. The strategy notes the importance of national forests for issues including carbon capture, strengthening biodiversity, wood production, and providing a green and liveable environment. The government seeks to increase forest cover by 10% by 2030, and also sets out its intentions to make current forested areas, both in protected and urban areas, more sustainable. Encouragingly, **much attention is paid to the importance of forests for people's wellbeing, both physical and social, and there is recognition of the deep value forests hold for people** and the role they have in connecting generations. These ideas, which also underpin Indigenous stewardship of lands all over the world, are key to ensuring that forests are not seen only as commodities to be exploited.

The Netherlands Nature Positive document, published by LNV and the Dutch provinces, covers the ambition for a joint approach to nature policy. It is promising that emphasis is placed on biodiversity as the underpinning fact of life on earth, with reference to food systems, wellbeing and health, yet there is no analysis of any gendered dimensions. The government states its plan to align the Dutch approach with global biodiversity frameworks, and we therefore recommend that policy-makers take careful note of the analysis in section 2.2.

The Nature Conservation Act (*Wet natuurbescherming*, 2017) is focused on protecting nature reserves as well as plant and animal species from harmful work and economic activities, in alignment with international standards such as the CBD, the Bern Convention and the Bonn Convention. It covers nature policy and monitoring for government action aimed at preserving and strengthening biological diversity, and the protection of landscapes in a national and international context. Unfortunately, the Act is not only gender-blind but almost entirely 'human-blind';

37. Ministry of Agriculture, Nature and Food Quality, 2019. [Nederland Natuurpositief](#). Ambitiedocument voor een gezamenlijke aanpak in natuurbeleid

38. Overheid, [Wet natuurbescherming](#)

39. Ministry of Agriculture, Nature and Food Quality, 2020. [Bos voor de toekomst _ Uitwerking ambities en doelen landelijke Bossenstrategie en beleidsagenda 2030](#)

there is no recognition of the interconnection between humans and nature⁴⁰, nor any suggestion of the human right to live in thriving and biodiverse ecosystems. If the Act is revised in future, it should take note of the recent UN declaration of the right to live in a healthy, clean environment⁴¹.

Beyond its own policies, the Dutch government also plays a role in ensuring that Dutch businesses operating internationally work according to responsible international business conduct (IMVO). The IMVO framework for sustainable forest management and timber products was valid from 2017 to 2020. Although the whole due diligence framework is currently being renewed at Dutch and EU level, the timeframe for the revision of the forest-specific agreement is not clear. The **written agreement was gender-blind**: despite recognising the need to pay attention to human rights, land rights and fair incomes for local people including smallholders⁴², there was no mention of a gender analysis. Further, there was no mention of the need for companies to identify, prevent, mitigate, and account for how they address the actual and potential adverse impacts that their operations, supply chain and business relationships have on women specifically. Despite being gender-blind on paper, the activity actually seems to have been at least gender-sensitive in its implementation. It was marked as having a 'significant' gender equality objective⁴³, and in the 2019-2020 report, it is detailed how the input of local communities including women's groups was emphasised "since day one"⁴⁴. This highlights how, **despite the fact that the Dutch government is doing some work on the intersection of gender and forests, it is being made invisible by gender-blind documents.**

It is a point of concern that **the current Dutch position to align with the EU corporate due diligence regulation would make it significantly less gender-sensitive/ responsive than initially planned.** The February 2021 letter to parliament⁴⁵ concerning national plans for socially responsible business conduct contained a promising gender analysis, highlighting the intention to pay close attention to gendered risks in value chains and the gender policies of businesses. However, in the foreign trade and policy note of June 2022⁴⁶ the BZ position is now to align with the planned

40. While we have used the term 'nature' throughout this document, as it features in many of the documents analysed, we wish to avoid reproducing what we believe to be a false binary division between humans and other parts of the natural world. As Tonio Sadik, scholar and Director of Environment, Assembly of First Nations (Canada) **powerfully captured during the 2020 Global Landscapes Forum Biodiversity Conference**: "...Indigenous peoples have known all along that we are nature and nature is us ... failing to see this simple truth is what has gotten us into this mess in the first place." For more on the false binary of nature/culture, see also MacCormack, C., & Strathern, M. (Eds.). (1980). *Nature, culture and gender*. Cambridge University Press.

41. UN News, 2022. **UN General Assembly declares access to clean and healthy environment a universal human right**

42. 2017, **Convenant Bevorderen Duurzaam Bosbeheer**, p.9.

43. Ministry of Foreign Affairs. Detailed report - **Convenant bevorderen duurzame bosbeheer**

44. *Bewust met Hout*, 2020. **Convenant Bevorderen Duurzaam Bosbeheer Year Report 2019-2020**, p.18

45. **Kamerbrief Maatschappelijk verantwoord ondernemen 26 485 nr 364**

46. Ministry of Foreign Affairs, 2022. **Beleidsnotitie Buitenlandse Handel en Ontwikkelingssamenwerking: Doen waar Nederland goed in is**

EU regulation, which has been criticised by civil society⁴⁷ for being insufficient and gender-blind. Unless the Dutch government goes further than the proposed EU regulation, any new national IMVO framework, including any forest-specific agreement, would also be at risk of gender-blindness.

2.2. Forest and biodiversity policy frameworks at the EU and global levels

The EU has put climate change and gender equality at the core of its agenda during the last few years, launching some flagship initiatives and strategies such as the Gender Strategy 2020–2025⁴⁸ and the EU Green Deal (GD)⁴⁹.

The EU Gender Strategy and the Gender Action Plan (GAP) III⁵⁰ are important milestones in the road to achieving gender equality, aiming to accelerate progress and safeguard the gains made since the adoption of the Beijing Declaration and its Platform for Action. The EU GD is the general action plan to combat climate change, aiming to reduce greenhouse gas emissions (GHG) by at least 55% by 2030 and achieve climate neutrality by 2050. It acts as an umbrella under which other environment and climate policy frameworks, strategies, and regulations come together. Forests and biodiversity, and their interlinkages with other sectors like agriculture, are key for climate change mitigation and thus to meet EU GD targets.

European forests' conditions are, on average, deteriorating, and their capacity to store carbon has declined throughout the last few years⁵¹. The EU Forest Strategy aims to revert this situation, improving both the quantity and quality of forests in Europe while placing emphasis on their multifunctional role. This strategy contains several regulatory, financial, and voluntary measures from 2021–2030, promoting sustainable forest management, alternative forest industries such as ecotourism, and financial resources, education, and training. Despite the growing number of female forest owners across Europe – currently estimated to be about 30%⁵² – and the growing evidence that women's meaningful participation in forest governance and management has 'significant positive effects' in forest conservation, **this strategy and its accompanying working documents are gender-blind.**

47. See for example Partos, 2022. [Stoplichtreactie op de BHOS-beleidsnota 'Doen waar Nederland goed in is'](#) – Partos and ActionAid International, 2022. [EU's gender-blind corporate due diligence proposal risks leaving women behind](#)

48. European Commission, 2020. [A Union of Equality: Gender Equality Strategy 2020–2025](#)

49. European Commission, 2019. [The European Deal](#)

50. European Commission, 2020. [EU external action: Gender Action Plan 2021–2025](#)

51. Forest Europe, 2020 [State of Europe's Forests 2020](#).

52. Gro Follo, Gun Lidestav, Alice Ludvig, Lelde Vilkriste, Teppo Hujala, Heimo Karppinen, François Didolot & Diana Mizaraitė (2017) [Gender in European forest ownership and management: reflections on women as "New forest owners"](#), *Scandinavian Journal of Forest Research*, 32:2, 174–184

Despite representing a serious threat to forests and other ecosystems, **the strategy does not sufficiently address direct subsidies and incentives to harmful activities.** This can include incentives that promote industrial and large-scale bioenergy but also activities like logging. The role of the Renewable Energy Directive (RED) is particularly relevant in this respect and, as it currently stands, it risks undermining the forest (and biodiversity) strategy because it still supports the use of biomass to produce energy to meet the climate targets.

There is plenty of evidence regarding the negative impacts that bioenergy has on environment and people⁵³. Sourcing and burning biomass from forests is neither renewable (wood is a limited resource that takes years to grow) nor carbon-neutral. On the contrary, it can produce significant emissions and cause air pollution. 'Wood residues' are often not enough to produce bioenergy at scale, which usually leads to further deforestation and forest degradation to obtain the necessary resources, and to the establishment/expansion of fast-growing monoculture tree plantations. These **plantations require large areas of land, which can lead to displacement and conflicts with communities** over the land. They are typically devoid of biodiversity - often being called 'green deserts' - impoverish habitats for wildlife, reduce overall ecological resilience, pollute freshwater resources due to the use of agrochemicals, increase fire hazards and pests, and typically provide only short-term and limited employment opportunities⁵⁴. Documented **gendered impacts include: increased sexual harassment and violence against women in and around these plantations; capitalisation on (often already insecure) land tenure arrangements; food insecurity; loss of unique traditional knowledge and medicines; reinforcement of the use of bioenergy with harmful impacts on (women's) health, fertility and other health disorders** associated to the use of agrochemicals⁵⁵.

The EU is the second biggest importer of tropical deforestation after China⁵⁶. The proposed EU deforestation-free commodities legislation has the potential to represent a milestone in addressing deforestation beyond the EU's borders. However, there are several issues, including some clear gender-differentiated implications, that need to be further addressed to ensure that it achieves its goals and does not have unintended negative impacts.

53. See for instance the **'Biomass Energy, Forests and Climate Library'** with more than 160 case studies explaining science behind biomass energy and its impacts on forests and climate

54. IPCC, 2022: **Climate Change 2022: Impacts, Adaptation and Vulnerability**. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegria, M. Craig, S. Langsdorf, S. Lösschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. In Press.

55. Global Forest Coalition, 2020. **The impacts of tree plantations on women & women-led resistance to monocultures**

56. Euronews, 2021. **EU is the world's second biggest importer of tropical deforestation**

The EU Commission's proposed regulation states that the EU will continue to work in partnership with producer countries and that it will offer new types of support and incentives to protect forests, improve governance and land tenure. Some of the commodities included in the regulation are largely produced by smallholders; globally, it is estimated that about 2.5 billion people⁵⁷ practice smallholder agriculture. However, it is important to note that the term "smallholder" does not necessarily include marginalised groups and that **the text does not take into account the specific views, needs and challenges that female smallholders face**. Likewise, in the current text it is not clear how the partnerships with countries will ensure support for smallholders, particularly women, to comply with the regulation's requirements and how it will be ensured that they are not negatively impacted by the legislation. **Negative impacts could include livelihoods' loss** by losing access to markets and value chains, which means there is a need for just transition strategies.

There is also a potential risk of market shifts triggered by this regulation that might lead to local producers being outcompeted in local markets. This is particularly important for women: **in developing countries they make up 60–80% of the agricultural labour force⁵⁸ and only 10–20% of them are landowners**. They are also most commonly responsible for producing food crops within small-scale farming systems, and they primarily produce for local markets. However, **women often lack access to markets, financial resources, and land tenure rights**, and have less possibilities to invest in product and process upgrading. Partnership-based mechanisms that are gender-blind could promote the replacement of local food sovereignty for an international food system based on commodity production for the international market and concentrated in the hands of a few actors⁵⁹.

Moreover, the scope of the regulation is rather narrow because it only focuses on forests and does not include other valuable ecosystems such as grasslands, where the production of some of the commodities outlined in the regulation also constitutes a threat. **By including other ecosystems, the regulation would better address the risks of leakage from shifting production**, which would in turn affect communities and peasants, particularly women. Key definitions such as 'forest' and 'deforestation' are still very vague; this can lead to land conversion of secondary forest to other land uses, like monoculture tree plantations, without being accounted for as deforestation.

57. IFAD and UNEP, 2013. [Smallholders, food security, and the environment](#)

58. FAO, 2011. [The role of women in agriculture](#)

59. Global Forest Coalition, 2022. [A gendered perspective of the proposed EU Regulation on deforestation-free products](#)

The European Parliament recently (September 2022) adopted a set of amendments⁶⁰ that will probably improve several aspects of the regulation. These **amendments include a reference to gender equality and references to women** regarding meaningful engagement with stakeholders, financial resources in partnerships and cooperation agreements, and when monitoring the impact of the regulation on vulnerable stakeholders.

The EU Biodiversity Strategy is based upon four pillars which contain specific key commitments, goals, and targets, including binding targets such as the EU Nature Restoration Law. It is closely related to, among others, the Farm to Fork and Forests strategies, and the Three Billion Trees initiative.

The first pillar focuses on the protection of nature and aims to expand protected areas to 30% of the EU's land and sea, putting a third of these areas under strict protection. While protecting nature is key, the strategy uses a rather narrow definition. **Gender- and human rights-centred approaches that respect, protect and contribute to the progressive realisation of human rights and gender equality, are missing**⁶¹. Another goal under this pillar is to effectively manage all protected areas through management plans in close cooperation with all stakeholders and interest groups. There are no references to gender or recognition of women and other marginalised groups as stakeholders.

The EU has so far failed to halt the loss of biodiversity and it did not meet the voluntary target to restore at least 15% of degraded ecosystems by 2020⁶². The second pillar of the strategy aims to address this, and the EU Nature Restoration Law is key for its effective implementation. **It has binding targets to restore nature and ecosystems but, as it stands now, is gender-blind.** Moreover, the target 'win-win solutions for energy generation' includes woody biomass to produce energy. As outlined above, bioenergy can be very problematic.

The third pillar is 'enabling transformative change' and yet gender is not mentioned. This raises a question about the EU's understanding of 'transformative', because **there cannot be transformative change without gender-responsive strategies, goals, and targets.** The goal to create a European biodiversity governance framework does not contain any reference on how administrative capacity-building, transparency, and stakeholder dialogue, will ensure and promote women's equal, full and effective participation.

60. European Parliament, 2022. [Amendments to the EU deforestation regulation](#)

61. For more concrete examples see for instance: [Implementing a human rights based approach: A briefing for the post-2020 Global Biodiversity Framework](#); [Gender Just Climate Solutions \(GJCS\)](#); [Community Conservation Resilience Initiative \(CCRI\)](#);

62. Target in line with [Aichi target 15](#) of the Conference of the Parties on the Convention on Biological Diversity

The Biodiversity Strategy has multiple references to Nature-based Solutions (NbS) and emphasis is placed on working with business to create incentives and eliminate barriers for the take-up of NbS. The term NbS is rather broad and vague, resulting in many actors branding practices such as carbon offset projects, bioenergy, and geoengineering as “green”⁶³. However, **evidence has highlighted that these strategies are highly questionable from a climate mitigation and adaptation perspective⁶⁴, and they have gender differentiated impacts** that are often ignored. The UN Environment Assembly (UNEA)⁶⁵ passed a resolution with a definition that was promoted by the EU under which land-based carbon offsets are still possible. Analysis shows that when forests become commercially more attractive through, for instance, carbon offset markets, there is a tendency to shift forest tenure and access rights from women to men, putting them at higher risk of exclusion and dispossession. Research has also shown that **women’s perception of well-being worsens after the implementation of market and carbon offset schemes**, and they fail to address climate change mitigation and adaptation, and structural inequalities⁶⁶.

Despite the commitment in the Gender Equality Strategy and the GAP III to integrate gender in all major EU initiatives, the analysed strategies are overall gender-blind.

This poses questions on credibility and policy coherence at the EU but also other governance levels. Questions of unequal access to resources, decision-making and inclusive forest and biodiversity governance are not addressed, and they do not lay out goals, targets, and actions to ensure equal opportunities for women. Notable too by its absence is the topic of gender-responsive budgeting.

At the global level, there are forest and biodiversity frameworks and agreements that address and have partially mainstreamed gender. A key global framework will be the post-2020 Global Biodiversity Framework (GBF) which contains clear targets and pathways for the conservation and sustainable use of biodiversity for the next decade. It is currently under negotiation and is expected to be agreed at the continued CBD COP15 in December 2022. The current draft has 21 targets and the text mentions gender equality, women’s empowerment, and gender-responsive approaches. Furthermore, there are ongoing efforts by civil society and dozens of Parties to add a **22nd stand-alone target on gender equality to “ensure women and girls equitable access and benefits from conservation and sustainable use of biodiversity, as well as their informed and effective participation at all levels of policy and decision-making related to biodiversity”**. To achieve a post-2020 GBF that is transformative, gender equality must be at the core.

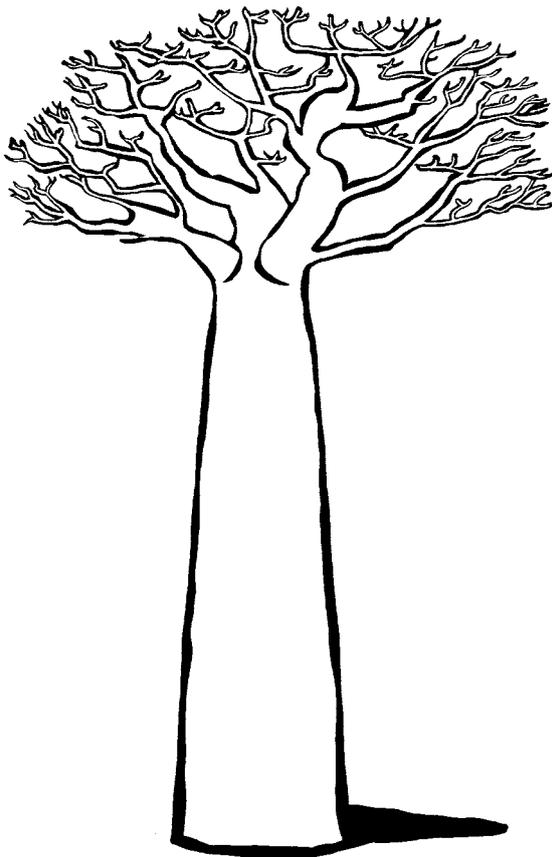
63. Global Forest Coalition, 2020. [#OurNatureIsNotYourSolution, International Day for Biological Diversity](#)

64. ETC Group, Biofuelwatch & Heinrich Boll Stiftung, 2017. [The big bad fix: The Case Against Climate Geoengineering](#)

65. UNEP, 2022. [UN Environment Assembly concludes with 14 resolutions to curb pollution, protect and restore nature worldwide](#)

66. Global Forest Coalition, 2021. [Gender justice and climate action: A feminist analysis of forest and climate policy-making](#)

Another initiative being rolled out is the Glasgow Leaders' Declaration on Forests and Land Use, announced at UNFCCC COP 26 in 2021. Leaders from more than 140 countries committed to work together to halt and reverse forest loss and land degradation by 2030⁶⁷. The pledge was backed by US\$12 billion in public funding – the 'Global Forest Finance Pledge' – and US\$7.2 billion in private funding. At least US\$1.5 billion is earmarked specifically for protecting the forests of Africa's Congo Basin⁶⁸ and US\$1.7 billion pledged towards supporting IPLCs and advancing their land tenure rights. The Netherlands has endorsed it and is part of the Global Forest Finance Pledge, but currently there is little clarity about how this will be implemented and there have been no clear developments since the pledge was announced. In the **financial pledges made so far, there is no mention of whether these pledges will mainstream gender, and how it will be ensured that women can access them and will benefit from them.**



67. UK COP 26, 2021. [Glasgow leader's declaration on forests and land use](#)

68. CarbonBrief, 2021. [Are the world's peatlands better protected after COP26?](#)



3. Recommendations and Conclusions

In recent years, there have been some advances in the gender-responsiveness of forest and biodiversity policy frameworks. Governments, institutions and multilateral agreements are more often committing to gender mainstreaming in their policy and programming, and are implementing gender action plans. However, progress is often limited to including women in a narrow capacity, without addressing structural inequalities, and other policies remain gender-blind to this day. We therefore set out some recommendations for developing truly gender-responsive policies, regulations and strategies.



At all stages and at all governance levels, **a diverse group of (IPLC) women, girls and gender-diverse people must be meaningfully involved in the development and implementation of forest and biodiversity policies, frameworks and programmes** which directly and/or indirectly impact their communities and landscapes. This is one of the Dutch government's own priorities for general foreign trade and development cooperation (BHOS⁶⁹) yet we do not see this reflected in the policies for forests and biodiversity. While the concept originally pertains to Indigenous communities, we recommend that all Free, Prior, and Informed Consent (FPIC⁷⁰) principles should also be met for women, along with a commitment to the principle of 'nothing about us without us'. Concrete examples include:

- **Increase the percentage of (programme) funding granted to grassroots and community-led and governed forest and biodiversity initiatives**, and reduce the administrative and bureaucratic burden which makes it challenging for grassroots initiatives to apply for funding in the first place. The approval criteria for the Strengthening Civil Society framework⁷¹, which requires a vision on cooperation with local organisations, is a good start, but still centres Global North-led organisations. It can be further strengthened by having grants specifically for Global South-led and implemented programmes.
- Ensure that stakeholder/community meetings are held at times and in places that are accessible to women, taking into consideration their higher burden of domestic tasks. **Women's perspectives, needs, aspirations and priorities may not be expressed when meetings are only held with community leaders**, who are often predominantly men.
- Provide documents in clear and accessible formats, translated into local languages. Ensure that information is also accessible in non-written formats.

69. Ministry of Foreign Affairs, 2018. [Theory of Change - Vrouwenrechten en Gendergelijkheid](#)

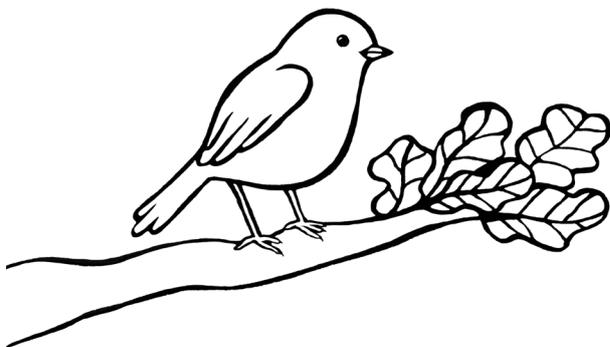
70. OHCHR. [Consultation and free, prior and informed consent \(FPIC\)](#)

71. Rijksoverheid, 2022. [Policy Framework Strengthening Civil Society](#)



Both at the Netherlands and EU level, decision- and policy-makers must **ensure that forest and biodiversity policies, as well as other interlinked policy frameworks and legislations, are aligned with their respective gender policy frameworks** and gender action plans. It is not always clear how they are coherent with each other, and it often seems that gender, forest and biodiversity policies have been developed in silos instead of in a holistic manner. Concrete examples include:

- Appoint gender experts to be engaged at all levels of forest and biodiversity policy formulation, development, and decision-making;
- Ensure that sufficient financial and technical support is provided for policy- and decision-makers, civil society, grassroots groups and practitioners, to develop, implement and update gender-responsive forest and biodiversity policy frameworks;
- Ensure support and capacity to maintain open communication and consultation with civil society groups working on the intersection of gender, forests and biodiversity;
- Promote capacity-building of staff (e.g. through training sessions) to encourage and enhance the participation of (IPLC) women, girls and gender-diverse people in the formulation, development and update of forest and biodiversity policies;
- Strengthen policy coherence and coordination with work being done at the intersection of gender, climate, forests and biodiversity under other governance bodies and conventions such as the United Framework Convention on Climate Change, the SDGs and Agenda 2030, and the CBD.





Both at national and EU level, there is a **substantial gap in the availability of gender-disaggregated data and information**, particularly on the intersection of gender, forests, and biodiversity. Having such information freely and easily accessible is paramount. Increasing efforts and capacity to bridge this gap is important since this information is key to analysing the impacts of current strategies and regulations from a gender perspective, but also to inform and shape future ones. Concrete examples include:

- **Ensure that gender-disaggregated data and information on gender, forests and biodiversity becomes more harmonised, clear, and easily available;**
- Enhance capacity-building for policy- and decision-makers and other relevant stakeholders to collect, analyse and apply gender-disaggregated data and gender analysis in the context of forests and biodiversity;
- **Ensure that intersectional and multidimensional factors are taken into account** to better inform and shape gender-responsive forest and biodiversity policies, strategies and frameworks and to anticipate potential risks and impacts of forest and biodiversity policies;
- **Schedule consultations with grassroots and women's rights organisations** working on the intersection of gender equality, forests and biodiversity to learn about best practices and methods to collect gender-disaggregated data and carry out gender (risk) analyses.



Develop or advocate for **clear and concrete strategies to mainstream gender in policy and programmes at different governance levels**; in written documents, the current approach appears to go little beyond vague commitments to "including women". Likewise, forest and biodiversity policies, strategies, and regulations at all governance levels must have specific gender goals, targets and actions. Concrete include:

- A target that promotes equitable, rights-based, gender-just community conservation initiatives – including Indigenous Peoples' and Community Conserved territories and Areas (ICCAs), which have proven to be socially and environmentally sustainable – in pillar I of the EU biodiversity strategy. The EU Commission will review the strategy by 2024 to assess progress, which could be a good opportunity for Dutch policy-makers at the EU to push for the inclusion of these changes.

- A target that ensures and promotes women’s full and effective participation in capacity building, the stakeholder dialogues, and the governance framework overall under pillar II of the EU Biodiversity Strategy.
- Support the ongoing efforts and push for a GBF that includes a standalone gender target. The Netherlands, as an important international advocate for gender equality and Action Coalition Leader for Feminist Movements and Leadership, should push for the adoption of GBF Target 22 within the EU and internationally. The Sustainable Development Goals (SDGs) are a good example of how gender can be mainstreamed throughout different goals, targets and indicators while also having a clear specific stand-alone goal on gender. Frameworks like the GBF could follow this example: some of the indicators and targets from the SDGs could provide a basis to develop and monitor a potential target 22 on gender equality (i.e. SDG 1.4.2 & SDG 16.7⁷²). This also supports coherence between different international multilateral frameworks and goals.



Beyond developing and committing to both gender-responsive policy and earmarked gender financing for (grassroots) women at the national level, Dutch delegates and negotiators should strongly advocate for equal access to resources and opportunities for the social, political and economic empowerment of girls and women. This includes, but is not limited to, **earmarking budget available for grassroots, local and IPLC women’s initiatives working on the intersection of gender and forests/biodiversity** in partnerships and policy processes the Netherlands is engaged in⁷³. Concrete examples include:

- Develop concrete targets on how the Global Forest Finance Pledge of the Glasgow Declaration will mainstream gender, and how women will be able to access and benefit from them. There must be an exhaustive monitoring of whether these pledges materialise, if they are additional, and how they are accessed and used. There should be transparent reporting of the implementation of pledges.
- Equally important is that the Glasgow Declaration, as well as other efforts towards halting biodiversity loss, deforestation and forest conservation, go hand in hand and start with the recognition of tenurial and collective rights of IPLCs, particularly of women. Likewise, this and any other national and international financial pledge should explicitly mention that they will not be used to support offsets, carbon markets and ‘zero net deforestation’ projects and initiatives.

72. Women4Biodiversity, 2021. Target 22 – **Gender in Post-2020 Global Biodiversity Framework**

73. Many of these processes and agreements have been named here, but those we have not covered include the Amsterdam Declarations Partnership, New York Declaration on Forests, and the Tropical Forest Alliance, for example.



Adopt strong due diligence regulations to ensure that neither Dutch public money nor activities of Netherlands-based companies negatively impact on women, including in the deforestation-free commodities legislation. When the IMVO agreement for sustainable forest governance is renewed, it is **imperative that stringent standards are set for businesses to prevent any harmful impacts on women**, both directly or indirectly through their own activities or through their supply chains. It is also crucial that Dutch policy-makers (continue to) advance efforts to **halt subsidies and perverse incentives to harmful activities for forests and biodiversity, especially those with clear gender-differentiated impacts (e.g. bioenergy)**. These subsidies and incentives should be redirected towards equitable, rights-based, gender-responsive and community-governed initiatives that foster ecological principles. This will contribute to ensuring coherence and consistency with international endorsed agreements such as the CBD and its Aichi Targets.



Dutch policy-makers should advocate for a review of the EU deforestation-free commodities legislation in the short-medium term after its implementation, and assess any potential impacts on smallholders, IPLCs, and women. An analysis of the gender-related risks as identified in our analysis should be carried out, and the regulation adapted accordingly. It is also important to ensure that, **in future, a gender impact assessment is included in the feasibility studies for this legislation and other EU forest and biodiversity policies**. Dutch policy-makers should advocate to ensure that the partnerships and cooperation plans described in the regulation are effectively developed in a gender-responsive, inclusive, and equitable manner, and that they include specific support, targets, and indicators for women and IPLCs that practise small-scale farming. It should **ensure that small-scale farmers, in particular women, receive support to get recognition of both their tenure and customary land rights**, as well as other rights recognized under the UN Declaration on the Rights of Peasants (UNDROP). Explicit references to agreements such as the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the UNDROP must be included, plus conventions that relate to women's and girls' rights such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)⁷⁴.



It is finally important to look beyond gender-differentiated vulnerabilities and we encourage Dutch decision- and policy-makers **to consider women not only as victims but also as active agents of change with real solutions and knowledge**

⁷⁴. Here we align with the recommendations from the briefing: [Global Forest Coalition, 2022. A gendered perspective of the proposed EU Regulation on deforestation-free products](#)

for these crises⁷⁵. Rather than simply describing women, girls, gender diverse people and other marginalised groups as ‘vulnerable’, there is a need to explicitly identify and address the underlying structural inequalities and power dynamics which *make* them vulnerable. Further, women in all their diversity must always be recognised and respected as rights-holders.

By following the above recommendations, the Dutch government can contribute to achieving a world in which forested landscapes and other ecosystems are sustainably protected and inclusively managed, biodiversity can recover and thrive, and IPLC and forest-dependent women in all their diversity experience the full enjoyment of their human and environmental rights. **Eventually, policies should go beyond being simply responsive to the needs of women and girls; they must be just and transformative**, and this means ensuring women’s rights to information, training, representation, governance, and access to resources, alongside sincerely recognising their agency, knowledge and skills. Meeting each of these aspects is a precondition to moving towards greater and just systemic change for all.



75. Here we align with the conclusions made in the IOB evaluation of gender mainstreaming in the Ministry of Foreign Affairs. They note that women are too often portrayed only as victims and highlight the need to move away from using disempowering language. See IOB, 2021 [Gender mainstreaming in the Dutch Ministry of Foreign Affairs](#)

ANNEX I

Set of guiding questions to analyse the gender-responsiveness of forest and biodiversity policies, strategies, and programmes

General questions:

- What international and/or regional agreements is the country a signatory to, e.g. CEDAW, Beijing Platform for Action?
- What national gender-related policies are currently in place?
- How are women in all their diversity represented in formal institutions and what is the proportion of seats held by women in the relevant political institutions e.g. national parliament and relevant ministries?
- Does institutional strengthening and capacity development consider gender equality in governance, policies, management, and staff?
- Is the policy in line with the government's national and regional policies/ obligations on gender equality, human rights, and forest and biodiversity?
- Does the policy include requirements for gender analysis and the collection of data disaggregated by sex?
- Does the policy consider gender-responsive budgeting to address gendered aspects?
- Does the policy mention and challenge potential inequalities and discrimination?
- Are the different needs, concerns and aspirations of women in all their diversity and men addressed equitably in the policy?
- Does the policy recognise the differentiated strengths, skills, and activities of women in all their diversity and men in relation to forest and biodiversity?

Questions of impacts of policies and development interventions:

- How does the policy impact people differently based on their gender? Do these factors influence their rights to access land, forests and natural resources?
- Are the issues of equal access to resources, decision-making, and inclusive governance properly addressed in the policy?
- Are these discriminatory social norms preventing the implementation of laws that guarantee equal access to resources for women and men?
- Are there any case studies, testimonies and/or gender-disaggregated data that can tell us more about who is impacted by the policy, and how?
- What are the main barriers to women's access to and control over resources?
- Are women in all their diversity and men as likely to own and/or manage land?

Questions about benefits from the implementation of any development activities (related to forest management/governance):

- How do local women in all their diversity and men from communities benefit differently from a specific forest policy?
- Do the policy or its implementation provide opportunities for the economic, political, cultural, and physical empowerment of women and girls, and how does this policy support women's collective action and leadership?
- What obstacles do women in all their diversity and other underrepresented groups must confront to benefit from these interventions? and, how do they overcome these obstacles?
- Which groups of people have got less benefits generated by the implementation of a policy? (e.g. single female-headed households, women, rural populations, etc.), and why?

Questions about consultation and decision-making:

- Do women in all their diversity and other underrepresented groups have equitable access over decision-making in forest governance and other related forest and biodiversity conservation activities? Are they consulted properly in the design and implementation of forest conservation and management related activities?
- In what ways can an unequal access to decision-making translate into a lack of agency for women in all their diversity and other underrepresented groups, and make them more vulnerable?
- What role do discriminatory laws or social norms play in women's access to decision-making and natural resource?
- Is unequal access to and control over resources perceived by members of the community as natural or fair? Is it questioned by some, and if yes, by who?





Picture:
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During community activities in Crocker Range, a woman crafts traditional woven bamboo products.

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