

Rang Undang-Undang Perubahan Iklim Negara (RUUPIN)

Feedback Submission from the perspective and needs of upholding Women's Rights obligations

These recommendations are compiled and analysed by Klima Action Malaysia (KAMY) through consultations and surveys with the stakeholders below.

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Overarching themes in climate

governance and legislation

1. Recognition Of The Right To Clean, Safe And Healthy Environment And Realisation Of Procedural And Substantive Rights
2. Lack of Social Inclusion in RUUPIN: A Missed Alignment with NPCC 2.0
3. Acknowledging and Integrating Human Rights Frameworks into RUUPIN
4. Harmonisation of laws

Key Considerations

1. National Gender and Climate Change Focal Point
2. Institutionalised Participatory Decision Making and Meaningful and Inclusive Engagement
3. Safeguard and Protection of Women Environmental and Human Rights Defenders
4. Disaggregated Data Collection, Monitoring and Evaluation, and Gender Impact Assessment
5. Gender Responsive Climate Finance
6. Capacity Building, Education and Community Level Awareness
7. Gender-responsive Disaster Response
8. Empowering women in the Just (Energy) Transition
9. Polluter Pays Principle and Carbon Recognition in RUUPIN

Key considerations	Feedback	Referring to section / part in the consultation paper
Overarching themes in climate governance and legislation		
<p>Recognition Of The Right To a Clean, Safe, And Healthy Environment And Realisation Of Procedural And Substantive Rights</p>	<p>We urge the RUUPIN to explicitly recognise the right to a clean, safe, and healthy environment as a fundamental human right, embedding both procedural and substantive rights as essential to this recognition.</p> <p>Procedural rights must mandate transparent and inclusive decision-making processes, providing marginalised and vulnerable communities with genuine opportunities to participate in climate policy development. Access to information, justice, and public participation are crucial to this process, with accessible platforms for public consultation, timely feedback, and meaningful stakeholder input.</p> <p>Substantively, RUUPIN must prioritise accountability for environmental harm and uphold the right to protection by establishing robust legal mechanisms. These must ensure equitable resource distribution and safeguard communities impacted by climate change, advancing environmental justice, public health, and sustainable development for current and future generations.</p>	<p>Section B: Guiding Principles of RUUPIN</p>

<p>Lack of Social Inclusion in RUUPIN: A Missed Alignment with NPCC 2.0</p>	<p>Based on the RUUPIN Consultation paper, this legislation framework lacks coherence with the ambitions set forth in the National Policy on Climate Change (NPCC) 2.0, which recognises the need for social inclusion in climate policy and the safeguarding of vulnerable, disenfranchised, and marginalised communities at its core. NPCC 2.0 calls for a robust integrated approach with clear strategic thrusts, actions, and environmental and social safeguards aimed at protecting local and Indigenous populations. However, these essential components are noticeably absent from the guiding principles of RUUPIN, signalling a significant step backward in Malaysia’s climate policy framework.</p> <p>Social inclusion must be a core objective of RUUPIN—not merely to fulfil international obligations but to meaningfully recognise and address the unique vulnerabilities within Malaysian society, aligning fully with the ambitions already established in NPCC 2.0. As stated in the consultation paper, RUUPIN’s objective is to implement climate mitigation and adaptation, yet it fails to acknowledge the disproportionate impacts on women, girls, Indigenous communities, low-income populations, and persons with disabilities who experience heightened risks due to intersecting vulnerabilities.</p>	<p>Section B: Objectives and Guiding Principles of RUUPIN</p>
<p>Acknowledging and Integrating Human</p>	<p>RUUPIN should commit to upholding human rights in climate action by recognising differentiated impacts on vulnerable groups and embedding actions</p>	<p>Section B: Objectives and</p>

<p>Rights Frameworks into RUUPIN</p>	<p>that are country-driven, gender-responsive, participatory, and fully transparent, as called for by the Paris Agreement. This includes aligning with international human rights frameworks, including:</p> <ol style="list-style-type: none"> 1. Universal Periodic Review (UPR) processes -Malaysia received four specific recommendations from other states on climate change and human rights during the UPR45 review (recommendations 55.207 - 55.210)¹, all of which were fully accepted. These recommendations emphasise the importance of including the rights of women, children, the elderly, and persons with disabilities in national climate change strategies. 2. Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) – specifically General Recommendations 37 and 39, which emphasise protections for women and girls in climate contexts including indigenous women and girls. In Malaysia’s sixth CEDAW cycle <i>Concluding Observations</i>², the CEDAW Committee, drawing on an NGO Shadow Report on <i>Women and Climate Crisis in Peninsula Malaysia</i>³, urged the Malaysian government to address the adverse impacts of climate change on women’s livelihoods, particularly 	<p>Guiding Principles of RUUPIN</p>
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¹ Universal Periodic Review of Malaysia (4th Cycle - 45th Session) - Thematic List of Recommendations. (n.d.). United Nations Human Rights Council. <https://www.ohchr.org/en/hr-bodies/upr/my-index>

² Committee on the Elimination of Discrimination against Women. (2024, June 6). *Concluding observations on the sixth periodic report of Malaysia*. United Nations Human Rights Treaty Bodies. <https://documents.un.org/doc/undoc/gen/n24/159/18/pdf/n2415918.pdf>

³ Klima Action Malaysia (KAMY). (2024). *Women and Climate Crisis in Peninsula Malaysia* - Submission to the 88th CEDAW Session. https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCEDAW%2FCSS%2FMYS%2F57993&Lang=en

	<p>rural and Indigenous women. The recommendations emphasise the need for women’s meaningful participation in shaping and implementing legislation, policies, and programs on climate change and disaster risk reduction.</p> <ol style="list-style-type: none">3. Convention on the Rights of the Child (CRC) – General Comment No. 26 (2023), addressing children's rights in the context of climate change4. Convention on the Rights of Persons with Disabilities (CRPD) – particularly Article 115. UN Human Rights Council’s Analytical Study – on promoting and protecting the rights of persons with disabilities in the context of climate change⁴ <p>These frameworks collectively emphasise the heightened risks faced by women, children, and persons with disabilities from the adverse effects of climate change. To meet these obligations, RUUPIN should incorporate gender impact assessments⁵, establish accountability benchmarks, and invest in capacity-building for stakeholders to ensure comprehensive, rights-based climate</p>	
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⁴UN. Office of the High Commissioner for Human Rights. (2020). *Analytical study on the promotion and protection of the rights of persons with disabilities in the context of climate change : report of the Office of the United Nations High Commissioner for Human Rights*. United Nations Digital Library. <https://digitallibrary.un.org/record/3865080?ln=en&v=pdf>

⁵ **Gender Impact Assessment:** A method of critically thinking and assessing how policies, programs and services will meet the different needs of different genders. The aim is to create better and fairer outcomes and ensure all people have equal access to opportunities and resources.(Victoria, Commission for Gender Equality)

	governance.	
Harmonisation of laws	<p>RUUPIN must be harmonised with a broad spectrum of national legislation, not limited to environmental and climate policies, to ensure comprehensive rights, protections, and avenues for redress for women and girls, people with disabilities, Indigenous groups, and marginalised communities. This alignment is crucial for safeguarding and upholding intersecting rights across various sectors. Relevant laws include:</p> <ol style="list-style-type: none"> 1. Aboriginal Peoples Act (Act 134) – recognising the rights of Indigenous Orang Asli communities; 2. Federal Constitution Article 8(2) – ensuring equality and non-discrimination; 3. Employment Act – providing labour protections; 4. Child Act – safeguarding children’s welfare; 5. Persons with Disabilities Act – addressing the rights and protections for people with disabilities. 6. Sexual Offences Against Children Act 2017 7. Anti-Trafficking in Persons Act 2007 8. Children and Young Persons (Employment) Act 1966 9. Education Act 10. Also legislation unique to Sabah and Sarawak 	Section B: Objectives and Guiding Principles of RUUPIN

	<p>RUUPIN must be drafted with these laws in mind to create a cohesive framework that addresses the specific needs and rights of all communities impacted by climate change.</p>	
Key Considerations		
<p>National Gender and Climate Change Focal Point</p>	<p>The RUUPIN must mandate the appointment and support of the UNFCCC National Gender and Climate Change Focal Point (NGCCFP) in accordance with UNFCCC’s Decision 3/CP.25, paragraph 11, ensuring this process is transparent and inclusive, guided by clear criteria and Terms of Reference. The NGCCFP’s responsibilities should align with the <i>UNFCCC Lima Work Programme on Gender and the Gender Action Plan</i>⁶, incorporating provisions for implementation at the national level as outlined below:</p> <p>1. Facilitate Cross-Stakeholder Engagement and Collaboration with Local Governments</p> <p>The focal point should establish a robust consultation process that actively engages a wide range of stakeholders, prioritising meaningful participation from women, marginalised communities, and relevant organisations. This includes collaboration with Gender Focal Points (GFPs) across ministries and the creation of dedicated units within sub-national agencies, particularly the National Disaster</p>	<p>Section C: Part 3 and Part 7 / add on where relevant</p>

⁶ *The Enhanced Lima Work Programme on Gender*. (n.d.). UNFCCC. <https://unfccc.int/topics/gender/workstreams/the-enhanced-lima-work-programme-on-gender>

Management Agency (NADMA), to develop comprehensive, gender-responsive strategies. Additionally, collaborating with local governments through town halls and community consultations will leverage the unique insights of local agencies, who are well-informed about community-specific issues and vulnerabilities. This combined approach ensures that planning and actions are both inclusive and sensitive to local needs and perspectives.

2. Capacity Building and Technical Support for Integrating Gender-Responsive Climate Policies

The focal point will be responsible for capacity-building initiatives aimed at integrating gender-responsive strategies into climate policies. This includes forming a national technical working group consisting of relevant experts and stakeholders, that will provide training, resources, and technical support to government officials and stakeholders involved in climate governance. This includes reviewing and revising legislation to remove practices that are gender discriminatory and ensure structures are placed supporting gender equality practices.

3. Develop Gender-Disaggregated Baseline Data

Establishing and maintaining a national baseline data system on gender and climate change is crucial. The focal point will prioritise the collection of sex- and

	<p>gender-disaggregated data to inform policy-making and ensure that climate initiatives address the unique needs and vulnerabilities of different gender and age groups, including those with disabilities.</p> <p>4. Mainstream Gender in National Budgets and Climate Policies</p> <p>The focal point will advocate for the integration of gender-responsive strategies across all climate governance structures. This includes ensuring that national budgets reflect gender considerations, thereby promoting equitable resource allocation and addressing the intersectionality of gender, disability, and ageing in climate change responses.</p>	
<p>Institutionalised Participatory Decision Making and Meaningful and Inclusive Engagement</p>	<p>1. Institutionalise a Formal Platform for Inclusive Stakeholder Engagement</p> <p>RUUPIN must establish a structured engagement mechanism at both national and sub-national levels, creating a multistakeholder advisory committee that mandates representation from underrepresented groups, including Indigenous women and youth. This platform should facilitate meaningful participation in climate governance and occur periodically.</p> <p>2. Implement Gender Impact Assessments and Quotas</p> <p>Mandate gender impact assessments for all legislative proposals to evaluate their implications for environmental sustainability and gender equality. Additionally, a minimum 30% quota for female representation in climate decision-making</p>	<p>Section C: Part 3 and Part 7 / add on where relevant</p>

	<p>bodies should be designated to enhance women’s leadership and participation.</p> <p>3. Facilitate Accessible and Inclusive Consultations</p> <p>Ensure public consultations are conducted throughout policy formulation and review processes, including those related to UNFCCC reporting. These consultations should be accessible via multiple platforms and formats, accommodating diverse communities and languages.</p> <p>4. Allocate Time for Feedback and Develop Tailored Communication Strategies</p> <p>Allow sufficient time for stakeholder feedback to ensure thorough and inclusive engagement. Develop communication strategies that are tailored to various groups, ensuring that all stakeholders receive relevant and understandable information throughout the decision-making process.</p>	
<p>Safeguard and Protection of Women Environmental and Human Rights Defenders</p>	<p>The RUUPIN must adopt a human rights-based approach to explicitly protect women environmental human rights defenders (WEHRDs) by establishing robust legal mechanisms for redress, including dedicated legal aid, financial resources, and access to legal counsel.</p> <p>It should incorporate anti-SLAPP provisions with mechanisms to dismiss SLAPPs early in the process and impose penalties on those filing such suits,</p>	<p>Section B</p>

	<p>thereby preventing retaliatory actions.</p> <p>Additionally, it should enhance access to justice for WEHRDs by addressing barriers faced by women in pursuing human rights violations and reinforcing the importance of pro bono legal support, particularly through strengthening the capacity of younger lawyers in regions like Sabah and Sarawak.</p> <p>RUUPIN should outline mechanisms to engage with women's rights groups to promote awareness of these protections and ensure marginalised communities can access adequate grievance mechanisms. This approach can be under the direct mandate of the National Gender and Climate Change Focal Point (NGCCFP) or an independent Climate Change Commission and will integrate the rights of WEHRDs into effective climate action while dismantling cycles of impunity and reinforcing protection for grassroots WEHRDs.</p>	
<p>Disaggregated Data Collection, Monitoring and Evaluation, and Gender Impact Assessment</p>	<p>1. Collection of Gender-Disaggregated Data⁷ and Grassroots Insights</p> <p>We urge that the NICDR prioritises the collection of gender-disaggregated data, capturing detailed local insights and the lived experiences of communities. To effectively manage this critical aspect, there needs to be a dedicated climate change and gender focal point, or a climate change commission, to drive the</p>	<p>Section C: Part 4 [NICDR and all relevant provisions on Data, Monitoring and Accountability]</p>

⁷ **Gender Disaggregated Data** : refers to data that is broken down by sex, ethnicity, income, strata, work, marital status, education, political participation and etc. This is to give a clearer picture of how different groups of women and men, experience their lives, including any inequalities and gaps between these groups.

	<p>collection and ensure the integration of gender-sensitive data into climate action strategies. Data should be collected at regularly established intervals and at the grassroots level, allowing for community needs and perspectives to inform local, state, and national policies and international reporting obligations. This data collection process should include:</p> <ul style="list-style-type: none">a) Engaging directly with communities and women’s rights groups to ensure that insights are representative and nuanced.b) Establishing a formal point of contact between the government and communities to facilitate effective data gathering and reporting.c) Building capacity within the NICDR to work with gender-sensitive indicators and track gender-specific impacts consistently.d) Issuing directives to collect data that is gender-responsive, disability-inclusive, and age-sensitive.e) Incorporate rules to govern data quality for accuracy and credibility <p>By institutionalising data collection partnerships, particularly with civil society organisations (CSOs), the NICDR can bridge gaps in data collection where government resources may be limited. These partnerships foster trust within communities, leading to more accurate and reliable data.</p>	
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	<p>2. Comprehensive Risk and Vulnerability Analysis</p> <p>The NICDR must incorporate robust risk and vulnerability analyses that address the specific climate impacts on marginalised and vulnerable groups, such as women, indigenous communities, and persons with disabilities (OKU). These analyses should account for socio-economic, geographic, and demographic factors that shape climate resilience. Such an approach is critical to understanding how intersecting vulnerabilities affect various groups, allowing for targeted adaptation measures.</p> <p>3. Integration of Scientific Research with Local and Traditional Knowledge</p> <p>To fully capture climate resilience strategies and environmental insights, the NICDR should integrate scientific research with local and traditional knowledge, particularly from Indigenous and rural communities. The Intergovernmental Panel on Climate Change (IPCC) has increasingly recognised the importance of such knowledge in its reports, especially in its Sixth Assessment Report (AR6)⁸, underscoring that these communities hold valuable understandings of environmental patterns and adaptation strategies that are crucial for addressing climate challenges.</p>	
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⁸ Carmona, R., Reed, G., Thorsell, S. et al. Analysing engagement with Indigenous Peoples in the Intergovernmental Panel on Climate Change’s Sixth Assessment Report. *npj Clim. Action* 2, 29 (2023). <https://doi.org/10.1038/s44168-023-00048-3>

	<p>4. Alignment with Reporting Obligations and Broader Stakeholder Engagement</p> <p>The NICDR’s data protocols should align with international reporting obligations, such as CEDAW’s General Recommendation 37 and Concluding Observations, UNFCCC’s reporting mechanisms (NDC, BTR and, etc) as well as ASEAN frameworks, to meet the standards required for comprehensive gender and climate reporting. The NICDR should also engage a broad array of CSOs, including those focused on women’s rights, to contribute to a diverse and inclusive dataset. This will ensure that data collection reflects the realities of women and other vulnerable groups, regardless of whether they are directly involved in climate work.</p> <p>5. Data Accessibility and Transparency</p> <p>The NICDR must prioritise data accessibility and transparency. Collected data should be available in user-friendly formats, multiple languages, and on platforms adapted for various abilities, ensuring that individuals with disabilities can access and interpret the information. The NICDR should also conduct regular audits of data collection processes and maintain open channels for public feedback to ensure the data’s accuracy, reliability, and accessibility.</p>	
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<p>Gender Responsive Climate Finance</p>	<p>1. Gender-Budget Tagging and Inclusive Criteria for National Climate Fund Utilisation:</p> <p>The RUUPIN must mandate the integration of gender-budget tagging within the planning and allocation processes of the National Climate Fund. This should include specific, well-defined criteria to ensure that a dedicated portion of the fund addresses women’s climate vulnerabilities effectively.</p> <p>Gender-disaggregated data must guide the allocation process to prioritise funding where it is most needed, enabling evidence-based decision-making in identifying high-priority sectors. Additionally, monitoring processes should be informed by this data to track progress and impact. To comply with the Paris Agreement’s gender and inclusion standards, ex-post impact assessments should align with Biennial Transparency Reports (BTR), ensuring consistent gender-sensitive accountability throughout the fund’s operation.</p> <p>2. Clear Methodology for Gender Impact in Climate Financing:</p> <p>The RUUPIN should set forth a structured methodology for identifying gender-relevant climate expenditures through rigorous situational analysis, ex-ante gender impact assessments, and Gender Markers (such as those by UNFCCC or OECD), which facilitate a precise gender analysis in fund expenditure and tracking. Additionally, the methodology should incorporate the Gender Responsive Budgeting in Policy (GRBiP) Programme, developed by</p>	<p>Section C: Part 6 [and other relevant financial provisions in the RUUPIN]</p>
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	<p>ENGENDER Consultancy and the Gender Budget Group and conducted with the Ministry of Finance, to ensure coherence with established national gender budgeting frameworks.</p> <p>3. Transparent Guidelines on Fund Allocation and Resource Access for Women:</p> <p>RUUPIN must specify the types and frequency of fund distribution with provisions for prioritising women’s access to climate resources. It should ensure that the National Climate Fund is utilised in a manner that is responsive to the unique needs of women and girls, particularly in addressing climate impacts. This includes establishing accessible financial pathways that empower women to directly benefit from climate finance. These pathways must address the systemic and societal barriers that often prevent women, particularly those in vulnerable communities, from accessing such funds. The distribution mechanisms should prioritise equitable and practical methods tailored to the needs and preferences of women and girls, ensuring that they are not subjected to unrealistic or burdensome requirements that would hinder their participation.</p> <p>4. Prioritising Climate Adaptation and Key Sectors for Gender-Sensitive Climate Finance:</p> <p>We urge the RUUPIN outline the necessary provisions or emphasis on allocation</p>	
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	<p>of dedicated funding and resources to sectors that are essential for enhancing women’s climate resilience, with a focus on climate adaptation efforts that address the specific vulnerabilities women face. This framework should be based on evidence-driven decision-making to prioritise sectors and areas most impacted by climate change.</p> <p>Key sectors requiring intensive support include Disaster Risk Reduction, Health, Care Work, Agriculture, Food and Water Security, Sanitation, Education, and Capacity Building. Additionally, gender-sensitive climate finance should support Gender-Based Violence (GBV) prevention and safe housing initiatives to protect women and girls during climate-related disasters, as well as community-based disaster preparedness and response programs that empower women as leaders.</p> <p>Funding should also strengthen public research and capacity-building efforts to identify and develop gender-responsive programs, ensuring these sectors contribute effectively to sustainable, equitable, and inclusive climate adaptation solutions. By targeting these areas, the RUUPIN can promote resilience and adaptation strategies that serve the needs of women and create lasting, gender-equitable climate resilience.</p>	
<p>Capacity Building, Education and</p>	<p>1. Given the regulatory entity's role in implementing climate education and awareness initiatives, the RUUPIN must mandate targeted capacity-building</p>	<p>Section C: Part 3</p>

<p>Community Level Awareness</p>	<p>for ministry and government officials. This training should ensure gender-sensitive, inclusive climate policy implementation, including:</p> <ul style="list-style-type: none">a) Gender Awareness and Socio-Economic Impact Training: Officials need comprehensive training on gender sensitivity, a human rights-based approach, and the socio-economic impacts of climate legislation. This dual focus will empower them to assess policies through a gender lens, address vulnerabilities, and support equitable development for women and marginalised groups.b) Gender-Disaggregated Data and Policy Framework Training: Equip officials to collect, analyse, and apply gender-disaggregated data for evidence-based decision-making, aligned with frameworks like the UNFCCC Gender Action Plan, CEDAW, and national gender policies. This will enhance accountability and ensure climate actions align with international and national gender commitments.c) Conflict Resolution and Grievance Mechanisms: Training in conflict resolution and grievance handling, particularly regarding gender-based issues and GBV, will ensure safe, accessible channels for women and communities to report grievances related to climate impacts.d) Inclusive and Participatory Policy Development Skills: Officials should learn inclusive policy design techniques that actively engage women, indigenous groups, and marginalised communities. This will	
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	<p>create climate policies that are responsive, resilient, and reflective of diverse perspectives and needs across all community levels.</p> <p>2. The Regulatory entity should drive public awareness and community-level education aligning with ST5S4KA1 of the NCCP 2.0 (which outlines the need to enhance local community preparedness and recovery for climate-related hazards and disasters, taking into account the requirements of vulnerable groups and gender perspective) through the following targeted initiatives:</p> <ul style="list-style-type: none">a) Gender-Sensitive Disaster Preparedness and Resilience Training: Develop community programs on safe emergency practices, resource access for women, first aid response and equitable disaster response. This should address women’s specific needs and include training on climate resilience strategies such as adaptation to extreme weather, water scarcity, and food insecurity.b) Accessible Climate Finance Education: Establish programs to boost climate finance literacy among women’s groups and marginalised communities, providing clear guidance on accessing grants, microloans, and funding opportunities. This empowers grassroots projects and strengthens community resilience.c) Litigation Literacy Programs: Establish initiatives to improve legal literacy by educating communities on their legal rights and methods for	
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	<p>accessing justice in cases of climate-related harm or human rights violations. This would include training in public interest litigation and raising awareness of legal recourse options through accessible channels like community centres.</p> <p>d) Inclusive Climate Rights and Advocacy Education: Ensure comprehensive education on environmental and climate rights, as well as training on engaging policy makers effectively. Focus on building knowledge of climate governance frameworks and advocacy skills to amplify women’s voices in climate policy.</p> <p>e) Inclusive Information Dissemination and Youth Education: Create a climate curriculum that incorporates gender sensitivity and prepares children early for climate challenges. Ensure information such as early warning messages reaches diverse audiences, addressing disability and language barriers to foster an inclusive, well-informed community.</p>	
<p>Gender-responsive Disaster Response</p>	<p>1.Expand Climate-Linked Social Protection Programs</p> <p>The RUUPIN should broaden the mandate of SOCSO and other social protection agencies to address climate-related vulnerabilities. This expansion would ensure that social protection programs support communities facing increased risks due to climate impacts, offering targeted assistance and financial security to help individuals and families recover from climate-driven disruptions.</p>	<p>Section C</p>

	<p>2. Establish Community-Based GBV Response Plans in times of Climate Disasters</p> <p>The RUUPIN should mandate the development of community-based gender-based violence (GBV) response plans to effectively address and refer to GBV cases, especially during and after climate-related crises. These plans should raise community awareness, incorporate support mechanisms for survivors, and ensure accountability for GBV incidents in post-crisis contexts, such as floods and other climate events, to protect and empower vulnerable individuals in impacted areas.</p>	
<p>Empowering women in the Just (Energy) Transition</p>	<p>1. Establish Effective Grievance and Redress Mechanisms for Impacted Communities</p> <p>RUUPIN should mandate clear, accessible grievance and redress mechanisms for communities impacted by mitigation projects, particularly for Indigenous communities affected by land rights infringements, displacement, and environmental degradation. RUUPIN should set guidelines for transparent grievance processes, including community-led tribunals, independent oversight bodies, and avenues for reparations. These mechanisms must prioritise culturally sensitive approaches and uphold Indigenous communities' rights to fair, prompt redress for any harm caused by energy transition projects. This is especially apparent in large mega dams such as the Nenggiri Dam where an estimated 5,000</p>	<p>Section C</p>

	<p>Temiar residents stand to be affected, with vast areas of customary lands, and significant cultural sites at risk of submersion, and multiple villages poised for displacement.⁹</p> <p>2. Address Unpaid Care Work and Social Protections</p> <p>The RUUPIN should provide social protections that recognise unpaid care work and facilitate women’s workforce participation. This includes support through flexible working options, accessible childcare, elder care services, and financial support for care work (diverse forms of remuneration and respite), allowing women to engage in green jobs and economic opportunities within a just transition framework.</p> <p>3. Gender-Inclusive Upskilling and Reskilling Programs</p> <p>Establish and fund continuous learning and training programs in green sectors tailored to women’s needs, with attention to accessible locations, flexible schedules, and financial support to offset unpaid care burdens. Targeted training on green skills and sustainable practices, especially for women in traditional sectors, will be critical for equipping women with the tools to thrive in a low-carbon economy.</p> <p>4. Address Gender Inequalities in Corporate and Workforce Structures</p> <p>Tackle embedded gender inequalities in corporate and organisational structures by</p>	
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⁹ Klima Action Malaysia, Suara Nadi Belia Asli Semenanjung Malaysia: Heartbeat Voices from Indigenous Youth of Peninsula Malaysia, November 2023.

	<p>overhauling entrenched systems of discrimination. This includes implementing policies to close wage gaps, increase female representation in leadership, and ensure that organisational cultures are inclusive of gender-specific needs. Companies should adopt Gender Equality and Social Inclusion (GESI) frameworks and robust CSR initiatives that address gender disparities, creating more equitable and supportive workplaces.</p> <p>5. Community-Centric Development and Inclusive Participation</p> <p>Encourage community engagement in development projects, prioritising gender-responsive approaches that consider the social impacts of these projects on women’s livelihoods. This includes having transparent EIA and SIA processes in Energy Transition projects, supporting women’s entrepreneurship in the green economy, and involving local women and men in decision-making to ensure sustainable and culturally sensitive transitions.</p>	
<p>Polluter Pays Principle and Carbon Recognition in RUUPIN</p>	<p>RUUPIN must incorporate the Polluter Pays Principle by mandating that entities responsible for environmental harm, particularly those emitting significant greenhouse gases, are held financially accountable for both remediation and mitigation efforts. Unlike the Environmental Quality Act (EQA), which does not classify carbon as a pollutant, RUUPIN should explicitly recognise carbon emissions as pollutants. This recognition allows for the implementation of mechanisms like carbon pricing, emission fees, and mandatory contributions to</p>	<p>Section C: Part 8</p>

	environmental rehabilitation funds. Embedding this principle ensures that polluters, rather than impacted communities or the public, bear the costs of environmental degradation, reinforcing accountability and supporting effective climate action.	
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This submission is prepared by **Persatuan Kesedaran dan Keadilan Iklim (Klima Action Malaysia - KAMY)**, a climate justice and feminist organisation established in 2019. We advocate for Malaysia's declaration of a climate emergency and the recognition of environmental rights in the constitution through a human rights-based framework. Our work focuses on legal empowerment, amplifying the voices of vulnerable communities, including Orang Asli communities and women, and ensuring their meaningful participation in climate governance. We are committed to promoting inclusive, rights-based solutions to the climate crisis that prioritise the empowerment of marginalised groups disproportionately affected by its impacts.

If you have any questions or need more clarification about this submission, please contact us at inquiry@klimaactionmalaysia.org