We appreciate the opportunity for providing feedback on the different issues that will be discussed during the upcoming session of the Open Working Group on Sustainable Development Goals.

We are deeply concerned about the analysis and proposals contained in the TST Energy briefing, for the following reasons:

- Although there is a strong focus on energy efficiency, little mention is made of the unsustainable patterns of energy consumption, which lie behind unsustainable energy generation, including from types of energy falsely classed as ‘renewable’ and ‘green’. Energy efficiency in itself is not a convincing tool for reducing excessive energy demands: historically, increased energy efficiency has consistently gone hand in hand with increased energy use and increased carbon emissions. Without deeper economic and social changes, there are no reasons to think that this link will be broken.

- The document strongly promotes energy for economic growth, without acknowledging any environmental limits to consumption and growth. While many people’s basic energy needs remain unmet, many others clearly use far more energy than is sustainable. Overall global energy consumption growth is incompatible with a stable climate and with environmental protection.

- The document states that the climate goal is for emissions to peak by 2020 – implying that further global greenhouse gas emissions increases are acceptable. This is entirely contrary to climate science which shows that current CO2 concentrations are already highly dangerous and destabilising the climate.

- The assumption that growth in ‘modern energy production’ goes hand and hand with accelerating social and economic progress is of serious concern. Indigenous Peoples and local communities have traditionally adapted to different ways of life that do not necessarily embrace the concept of ‘progress’ used in this sense, and thus the destruction of their traditional ways of life. Rather than simply assuming that ‘modern energy’ is beneficial for communities, communities need to be at the heart of decisions over

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the energy they use, based on their real needs and on objective information about the effectiveness of different types of energy generation.

- The proposal clearly endorses the Sustainable Energy for All Initiative (SEFA), a major and controversial public private partnership. We note that the Rio+20 document: "The Future We Want" did not endorse the initiative due to many delegates' reservations. However, that document (i.e. "The Future We Want") does not clearly spell out what the benefits will be for Indigenous Peoples and local communities and how will they engage in processes that will serve meet their needs and not the interests of those actors at the top of the energy discussions/business.

- SEFA does not exclude any types of energy, including coal and nuclear power from its definition of 'sustainable energy' potentially eligible for finance within its remit. This means that supporting SEFA implies support for ever greater fossil fuel use. The only type of energy classed undesirable in this document and by SEFA is 'traditional biomass'. No distinction is made between different forms of traditional biomass and their impacts but instead it is assumed that all of it is by definition polluting and unsustainable, whereas 'modern' bioenergy, hydrodams and even fossil fuels are all classed as 'modern' energy.

- Striving for a 'renewables mix' every time higher while ignoring the need for reducing the demand and failing to recognize planetary boundaries (and limitations of available biomass), could result in further land grabbing conflicts, further climate emissions and further destruction of natural ecosystems. In this context, we are particularly concerned about SEFA’s strong support for large-scale hydro dams and their and this document’s explicit support for "combined food-energy systems", a term that used for example by proponents of palm oil, soya and sugar cane monocultures;

- Neither SEFA nor this document acknowledge the need for deploying the precautionary approach in relation to new energy technologies which are being sold and promoted to developing countries. Many of the technological solutions proposed for climate change mitigation are motivated by profit and are of deep concern for women. SEFA lacks any mechanism for assessing technologies at all – indeed, SEFA has made it clear that they will exclude no form of energy other than traditional biomass from their definition of 'sustainable energy'.

Using SEFA as a basis for energy policy falls short on what the needs of people – especially women - biodiversity and the climate are. Current SEFA proposals claim to bring benefits to people by providing jobs in the energy sector, but indications are that those will to a large part be jobs in fossil fuel extraction, hydro dam construction and on monoculture plantations for bioenergy – not jobs that will benefit women.

By promoting further global partnerships in the absence of credible accountability and regulatory mechanisms or even criteria as to which types of energy are classed as 'sustainable', we run the risk of firstly perpetuating dependence on fossil fuel energy systems and secondly replicating similar problems and dynamics through forms of energy falsely classed as 'renewable'. Transformations of energy systems and policies are needed but we are concerned that the emphasis on 'attractive investment climates through policies, facilitating finance' could move us further away from the transformations that are needed.

In principle we welcome the recognition of a need for gender disaggregated data. However, we are concerned that data collection in itself will do nothing to protect and further the rights and livelihoods of women when the overall approach to energy policy is so deeply flawed. Women are particularly affected by land-grabbing, they bear the brunt of food insecurity that is exacerbated by biofuels policies, they are
suffering the impacts of increased fossil fuel extraction and polluting energy developments that are already being promoted through SEFA.

We agree that ‘energy directly impacts on people, communities and countries in terms of economic growth, employment, health, security and education. It also affects ecosystems and is linked to climate change’. Therefore, it must also be recognized that the way in which that energy is produced is an important part of the discussions. For instance, in terms of climate change, conversion of land into agri-businesses plantations, either with a mix of staple foods or not, will definitely contribute with emissions and impact food prices, availability of land and thus, create conflicts with local communities. Women in this sense are specially affected; it has been recognized that women and children in developing countries are the main victims of climate change (not just higher death rates after extreme weather events but also victims of violence in refugee centers, among others); women are also commonly the ones to be confronting security forces that displace people from their traditional lands in order to secure the land to different agri-businesses (e.g. biofuel industry – different cases have been seen in Sierra Leone & Uganda).

In this sense, we caution that in the above-mentioned document statements such as ‘renewable resources in developing countries remain ‘largely unexploited’ could open up the path for further forms of green land grabbing and further human rights violations.

We therefore believe that the Women’s Major Group must reject this document and call for a fundamentally re-written one. What are needed are energy policies and strategies that:

• are based on the principle of energy sovereignty;
• rely on decentralised and democratically controlled energy generation and use;
• result in more equitable access to energy which means meeting everybody's fundamental energy needs while reducing excessive energy consumption at the same time;
• protect the climate, ecosystems, and communities’, including women’s livelihoods and rights.

Fossil fuels, nuclear, industrial wood-based bioenergy and biofuels as well as large hydro dams must not be subsidised, whether directly or indirectly. Decentralized, democratically controlled and genuinely renewable energy generation can greatly benefit women by increasing access to energy for those whose fundamental energy needs are not currently being met, by eliminating harmful types of energy generation, and by creating income generating opportunities for women, especially in developing countries.