

Environmental Pillar Consultation Response to: The Draft Framework for Sustainable Development for Ireland, Dec 2011.

Consultation Response: Feb 2012

Abstract

The Environmental Pillar welcomes the publication of this Draft FSDI, and the opportunity to submit a commentary on it. The draft brings together a wide range of important information, referencing some 84 policies, strategies and international agreements and covering most aspects of the three pillars of sustainability; social, environmental and economic. Although the Environmental Pillar argues that the Strategy lacks a clear vision for Ireland in its opening statements, sustainability is clearly established as a priority for the country. Sectoral challenges, commitments and targets, gaps and measures are listed although some omissions are highlighted here.

The Environmental Pillar notes with serious concern the absence of SMART (specific, measurable, accountable, realistic and time-bound) measures and implementation cycles without which neither the Strategy nor the 84 references it is using as metrics are likely to succeed.

It is clear that there will be conflicts between the interests of different sectors and policies prescribed in the FSDI, but there is no attempt to name these or to provide mechanisms to resolve same, despite references to partnership. Ownership of the FSDI by the public is essential for its implementation as is a strong political champion. The absence of public participation in the development of the draft will be a serious handicap in this regard.

The Environmental Pillar believes this to be a critically important strategy for the future success of Ireland, and in this submission it has attempted to address all the areas where it found gaps in the draft document. A new role for NESC as the National Sustainable Development Council would further recognise the shift away from sectoral silos towards a holistic understanding of the absolute integration of the three pillars of sustainability.

The championing of the Strategy by An Taoiseach is essential if it is to take on its role as an overarching national strategy with which all other strategies, policies, programmes and plans must concur.

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Whilst this document was developed through the processes of the Environmental Pillar it does not necessarily represent the policies of all its members.

A Safe And Just Space for Humanity

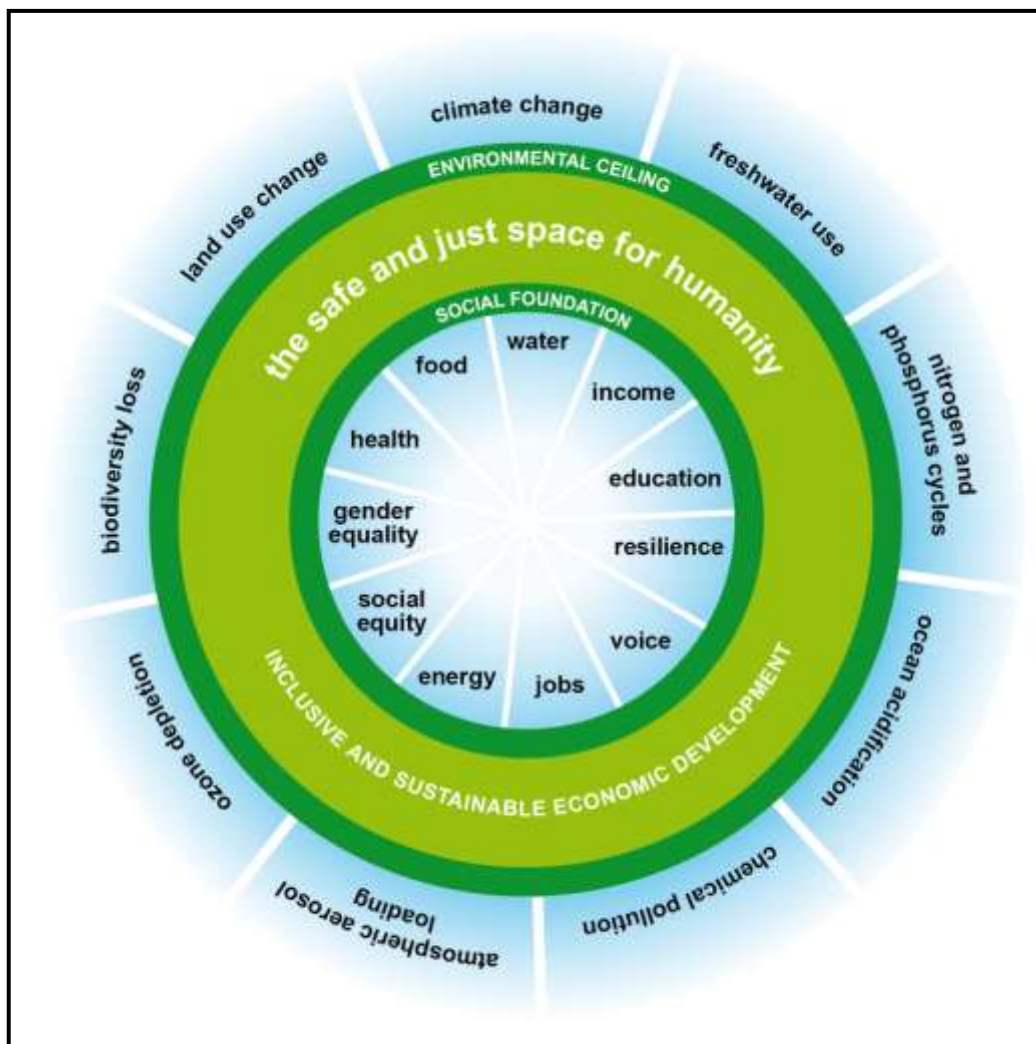


Fig. [A safe operating space for humanity](#)¹

Identifying and quantifying planetary boundaries that must not be transgressed could help prevent human activities from causing unacceptable environmental change, argued Johan Rockström and colleagues in 2009². Source Oxfam inspired by Rockström et al³. From a purely selfish anthropocentric point of view, a safe operating space for humanity cannot exist whilst we continue to kill off the other species of plants and animals that provide many of the services that humanity relies on for its well-being. However, the Environmental Pillar would add that the whole diversity of life deserves a safe operating space too, and we as a species are very reducing their space too.

¹ http://www.youtube.com/watch?feature=player_embedded&v=PCAx3TG8LkI

² <http://www.nature.com/news/specials/planetaryboundaries/index.html> [Accessed 20/02/2012]

³ <http://blogs.oxfam.org/en/blog/12-02-13-can-we-live-inside-doughnut-why-world-needs-planetary-and-social-boundaries> [Accessed 20/02/2012]

1. Preface

1.1. Introduction to The Environmental Pillar – Who are we?

The Environmental Pillar was included as the fifth pillar of Ireland's Social Partnership in April 2009, and is made up of 27⁴ national environmental NGOs, acting together as one social partner alongside the Trade Unions, the Employers, the Farmers and the Community and Voluntary Pillars. Although the national arrangements for Social Partnership are not functioning at present, the Environmental Pillar is working through Social Dialogue with the other social partners and government at the national and local levels to:

- promote the protection and enhancement of the **environment**, together with:
- the creation of a viable **economy** and a just **society**;

without compromising the viability of the planet on which we live for current and future generations of **all** species and ecosystems. Our basic premise is that:

The continuing success of human society and social systems depends fundamentally on the preservation of the overall productivity, health, and long term sustainability of the ecosystems and environmental services that underpin and supply many of the most basic components of human welfare such as a healthy biodiversity, productive soils, clean water, and clean air.

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An

Taisce, BirdWatch Ireland, Coastwatch, FEASTA, GRIAN, Irish Doctors' Environmental Association (IDEA), Irish Wildlife Trust (IWT), Sonairte, VOICE, Bat Conservation Ireland, CELT (Centre for Environmental Living and Training), CoastWatch, Coomhola Salmon Trust, Crann, ECO-UNESCO, Forest Friends, Friends of the Earth, Gluaiseacht, Hedge Laying Association of Ireland, Irish Natural Forestry Foundation, Irish Peatland Conservation Council, Irish Seal Sanctuary, Irish Seed Savers Association, Irish Whale & Dolphin Group, Sustainable Ireland Cooperative (Cultivate), The Organic Centre, Zero Waste Alliance

2. Summary for Policy & Decision Makers

The Environmental Pillar welcomes the publication of this Draft FSDI, and the opportunity to submit a commentary on it. The draft brings together a wide range of important information, referencing some 84 policies, strategies and international agreements and covering most aspects of the three pillars of sustainability; social, environmental and economic. The delivery of a high quality strategy for sustainable development will not only provide government and the public with a vision of a fairer, inclusive and sustainable Ireland, it will also signal to the world that Ireland knows the path it needs to take to achieve a sustainable future, whilst clearly taking into account the reality of planetary limits. This draft attempts to do this but falls down in a number of areas. The Environmental Pillar attempts to highlight these gaps and proffer ways in which the Strategy can be made stronger and able to deliver on the many laudable aspirations already in it.

The Environmental Pillar argues that the Strategy lacks a clear vision for Ireland in its opening statements, whilst at the same time sustainability is clearly established as a priority for the country. Much good material that should be in the opening defining section of the FSDI is lost in the body of the document. The planetary limits are named but should be in the opening statement as a yardstick against which the rest of the document should be measured.

Sectoral challenges, commitments and targets, gaps and measures are listed although for example tree-cover and the marine are not given the space in the Strategy that they clearly merit under all three pillars of sustainability.

The Environmental Pillar notes with serious concern the absence of SMART measures and implementation cycles without which neither the Strategy nor the 84 references it is using as metrics are likely to succeed. The use of these 84 policies, strategies and international agreements without assessing their fundamental worth, or their history of delivering the changes that they prescribe, leaves the Strategy with very questionable foundations. If the Strategy is to have any hope of delivering then clear PDCA cycles have to be implemented; for the Strategy itself but also as measures for each of the 84 metrics as well as the prescribed Strategy measures for which there are at present no metrics. It would have strengthened the analysis that preceded the development of this Strategy if a review of the efficacy of the 1997 NSDS was carried out and if the lessons learned were carried forward into this new Strategy. There are many lessons to be learned there, and the most important is that whilst the document had many fine aspirations it lacked an effective implementation strategy with a strong champion and clearly defined responsibilities for delivery.

It is clear that there is the potential for conflicts between the interests of different sectors and policies in the FSDI, but unfortunately there is no attempt to name these or to provide mechanisms to resolve same, despite references to partnership.

Ownership of the FSDI by the public is essential for its implementation, and in order to develop the awareness that will create the space for the necessary changes that will deliver a sustainable future for Ireland both during and after the life of this Strategy. The absolutely necessary participation of the public in the delivery of this strategy will require radical shifts in governance at all levels, and the development of new participatory tools and practices. This process needs a roadmap in the Strategy. The absence of public participation in the development of the draft will be a serious handicap in developing this public ownership.

Whilst the public were largely excluded from the development of this draft, many government departments were deeply involved in its design, and its remit reaches into almost all departments. It is essential then that these same departments take responsibility for their part in its creation and its delivery by placing their departmental signatures on the Strategy as a public commitment to its

Environmental Pillar Submission to the FSDI Consultation

implementation. The championing of the Strategy by An Taoiseach is essential if it is to take on its role as an overarching national strategy with which all other strategies, policies, programmes and plans must concur. Annual reporting to the Oireachtas by the Taoiseach on the implementation of the Strategy will provide the opportunity for assessment of progress and accountability.

A new role for NESC as the National Sustainable Development Council would further recognise the shift away from sectoral silos towards a holistic understanding of the absolute integration of the three pillars of sustainability.

The Environmental Pillar believes this to be a critically important strategy for the future success of Ireland, and in this submission it has attempted to address all the areas where it found gaps in the draft document. In the short time allowed for consultation it was impossible to deliver detailed proposals to fill these gaps, but the Pillar would welcome the opportunity to work with the authors in developing same.

3. Introduction

3.1. Introduction

The Preface to this document provides an introduction to the Environmental Pillar and its membership of 26 major Environmental Non-Government Organisations in Ireland, and their underlining perspective on the interdependence of environment, economics and society. These groups have co-operated to produce this response to the 'invitation to comment' on the document produced by Department of the Environment Community and Local Government, DoECLG entitled "Framework for Sustainable Development for Ireland", FSDI.

Section 3.3 below refers to the context set out by the DoECLG in relation to the Rio+20 Summit in June 2012 and the Department's position on the FSDI in the context of the forthcoming summit as follows:

"The Framework will form a central element of Ireland's contribution to the UN Conference on Sustainable Development (Rio+20)"

The Environmental Pillar sees a 'Framework for Sustainable Development for Ireland – an FSDI' as a truly golden opportunity for Ireland to position itself on the International Stage not just as a thought leader, but an implementation leader in the lead-up to Ireland's presidency of the European Union in 2013. This is a period which will see critical reviews and decisions being taken on a range of matters including the 7th Environment Action Plan, CAP reform, transportation emissions and the challenges to deliver on commitments under the Water Framework Directive, biodiversity targets, climate change targets and marine reforms.

The Environmental Pillar also sees there is a critical imperative to acknowledge properly, communicate and address the **environmental crises** which face us **for which no troika bailout exists**.

We are in danger of tipping the environmental balance beyond the point of no return and there simply won't be a bailout option.

There is no Troika for the environmental crises!

To credibly document the transition from where we are now to where we want and need to be is the job of the FSDI. This submission is intended to address the major areas where it the draft FSDI fails to do what *'it says on the tin'* namely to be a Framework for Sustainable Development for Ireland.

In this introductory section of the response the Environment Pillar, wishes to make clear three main messages:

1. Firstly the Environment Pillar welcomes this opportunity to comment and indeed expresses the hope that this is a start rather than an endpoint in the consultation and engagement necessary to deliver on the critical agenda of sustainable development in Ireland.

The second and third messages summarise the overwhelming view regarding the failures of the underlying approach taken to the development of this document and are even more critical of the delivery mechanism it purports to outline for Sustainable Development. In summary it is the considered view of the Environmental Pillar that:

2. The lack of public participation in the development of this 'framework' represents a failure to deliver on the fundamental tenets of participation established in Principle 10 of the Rio Declaration and Agenda 21 in 1992. This is an ominous signal regarding the Government's appreciation of the collaborative approach required to deliver on the objective of truly sustainable development. In developing a framework and path to sustainability – there has therefore been a singular failure to take on board the views of those representing the key stakeholder, the voiceless ENVIRONMENT – whose current situation and finite resources are the critical constraint which needs to be taken into account in evaluating the imperative to move toward Sustainable Development and any associated equation or approximation to facilitate that transformation to Sustainability.
3. The Strategy also fails to deliver a credible 'framework' to deliver on Sustainable Development. To succeed as strategy it will need:
 - An assessment of the quality and implementation of the 1997 NSDS and the lessons to be learned
 - an accurate and realistic Current Situation Appraisal;
 - an envisioned end state or goal that recognises the limits to growth and the absolute dependence of society and the economy on a healthy biosphere;
 - necessary transitional states;
 - milestones to facilitate navigation through the transitions;
 - recognition and identification of critical system constraints;
 - actions to facilitate the transition specified in terms which are SMART (specific, measurable, accountable, realistic and time-bound).

There is also a need to focus on and characterise 'the challenge' appropriately in the introductory sections of the draft FSDI document; where the emphasis is on the economic crisis – rather than the underlining environmental crisis. There is a need to 'get real' about the inherent futility of addressing an economic recovery in the absence of re-dressing environmental sustainability, and the need to ensure our economic recovery is a lasting one based on firm and sustainable development principles.

The document needs to provide a credible governance structure and process to deliver on this major transition programme; or to stipulate any underlining national legislative backbone to the requirement for Sustainable Development where Sustainable Development has been a legal obligation since the signing of the Amsterdam Treaty⁵. Partnership is raised as a mechanism for delivery but without any understanding of what this might look like.

The draft FSDI document also fails to reference the World Trade Organisation agreements to which Ireland has bound itself both as a sovereign state and as a member of the EU. There is a need to identify and seek to resolve the conflict between such agreements and the achievement of sustainable resource consumption, consequent emissions, and equitable resource management across developing and developed nations.

⁵ The new Article 6 puts at the start of the EC Treaty the clause calling for environmental protection requirements to be integrated into the definition and implementation of other policies. This was already contained in Article 174 (ex Article 130r). The new article also cites such integration as one means of promoting sustainable development.

The draft FSDI cites EU Europe 2020 Strategy and its flagship initiative “A Resource Efficient Europe” Sep 2011 which aims to decouple the use of natural resources from economic growth as proposed originally in Rio. However this strategy does not have the force of EU law and is undermined by EU competition law and WTO agreements; and the fact that under the Troika agreement and our recovery plan – Ireland is exempt from reporting on its Europe 2020 targets. The draft FSDI fails to document let alone address the implications of these conflicts and challenges in delivering on Sustainable Development.

The draft FSDI also fails to name the clear conflicts between different strands of the document, and to address the need to put in place mechanisms for resolving these issues.

Therefore, the Environmental Pillar seriously questions the ability of this draft to do the critical job of facilitating a transition to a sustainable development model in Ireland in the absence of a significant restructuring and a rewrite of core elements of the document and the commitments therein.

In summary it is the considered view of **the Environmental Pillar that the draft FSDI document fails:**

- **to express the necessary imperative to facilitate and mobilise the level of behavioural shift and emphasis required;**
- **to deliver a credible framework and associated measures to deliver the level of transformation required to make Ireland function in a sustainable manner;**
- **to address the conflicts and challenges to same; and seize the associated opportunities; and**

The unacceptable risk of this proposed draft framework is that it will maintain a status quo from which at the end of the life of this strategy we will simply not be in a position to recover. Nature comes with no ‘Troika’ – there will be no environmental bailout – when our environmental deficits tip the point of no return.

3.2. Document Structure

Further to the Preface and Introduction above:

- Section 3.3 provides what is described as “Critical Context for this submission”.
- Section 4 'Requirements for an FSDI' provides the over-arching commentary on the draft FSDI and critical recommendations in respect of the requirements for the document and the Framework it purports to define. In this section key themes in relation to the opportunity and the strategic methodology required are highlighted in grey and discussed.
- ❖ **Critical recommendations are highlighted by bullet points with this symbol.**
- Section 5 of the document refers to the sectors detailed in section 2 of the Draft FSDI with particular additions for areas such as Marine, Aquaculture, and Forestry which were not adequately dealt with in the draft. There is a focus on required changes to the measures/actions proposed at the back of each sector section.
- In section 6, Specific paragraphs from the draft FSDI are shown with revisions. For example, the use of words and phrases such as “continue to” and “further improve” are amended to remove words like “continue” and “further” – as they are considered to give an erroneous and misleading impression of our current situation and the starting point on the journey toward sustainable development. Without a baseline assessment of the implementation of the 1997 NSDS it is not possible to say what its impact was and what improvements have been made. However what is required in a document of this nature is a clear and realistic view of the starting point and the gap between where we are and where we need to be, both in terms of mind-set and actions. Other specific statements from the document are challenged or commented upon. However this in no way implies that a series of edits will suffice to redress the significant deficits in the draft FSDI outlined in sections 3 and 4 and 5 of this response in particular.

3.3. Critical context for this submission

3.3.1. Consultation Call

The Minister for the Environment, Community and Local Government, Mr Phil Hogan, T.D. has launched a new draft Framework for Sustainable Development for Ireland, FSDI for public consultation.

According to the Department's website ⁶ - the Framework will form a central element of Ireland's contribution to the UN Conference on Sustainable Development (Rio+20) which takes place in Rio de Janeiro, Brazil in June 2012. This major conference marks the 20th anniversary of the 1992 UN Conference on Environment and Development (the Earth Summit).

A critical objective of the conference is to secure renewed political commitment for sustainable development, assess the progress to date and identify the remaining gaps in the implementation of the outcomes of the major summits on sustainable development.

The Pillar welcomes this opportunity to comment and indeed **would hope that this is a start rather than an endpoint in the public participation necessary to deliver on the critical agenda of truly sustainable development in and for Ireland.**

The draft FSDI document issued for consultation is in effect – Ireland's homework. This consultation should be considered as an opportunity to correct and improve upon it – before it is examined by our international peers.

3.3.2. The State of the Environment

At the very back of the draft FSDI on page 77 of 89 the UNEP report, "Towards a Green Economy – Pathways to Sustainable Development and Poverty Eradication", and the draft FSDI states how this UNEP report:

"extensively discusses the issues which must inform any long-term outlook for Ireland. The report points out that many simultaneous crises have unfolded during the last decade: climate, biodiversity, fuel, food, water, and more recently, in the global financial system"

The reality is that we face two crises, the Economic Crisis and an even more fundamental Ecological Crisis. We have been living beyond our means not just fiscally but also environmentally.

- In the first nine months of last year the human population used more natural resources than the Earth can replace in a whole year....
- In the same nine month period it also generated more pollution than the Earth can absorb in a whole year....
- ...In Ireland we had used our twelve month's fair share by 1st of May ⁷ !

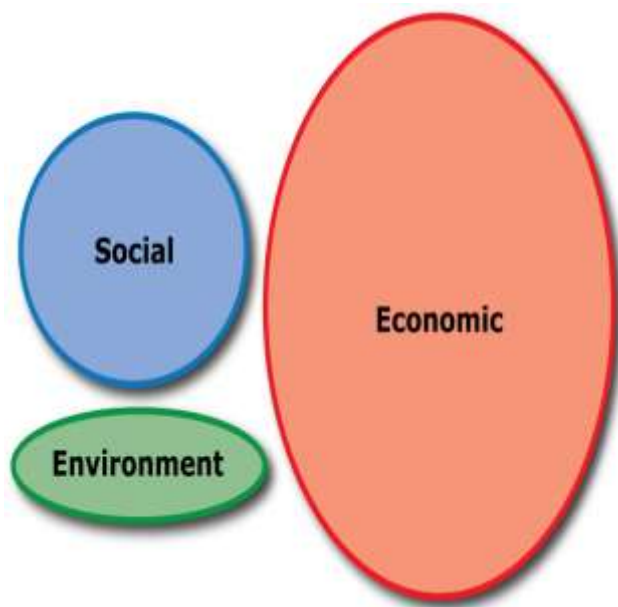
⁶ <http://www.environ.ie/en/Environment/SustainableDevelopment/ConsultationFrameworkforSustainableDevelopmentforIreland/> [Accessed 28/02/2012]



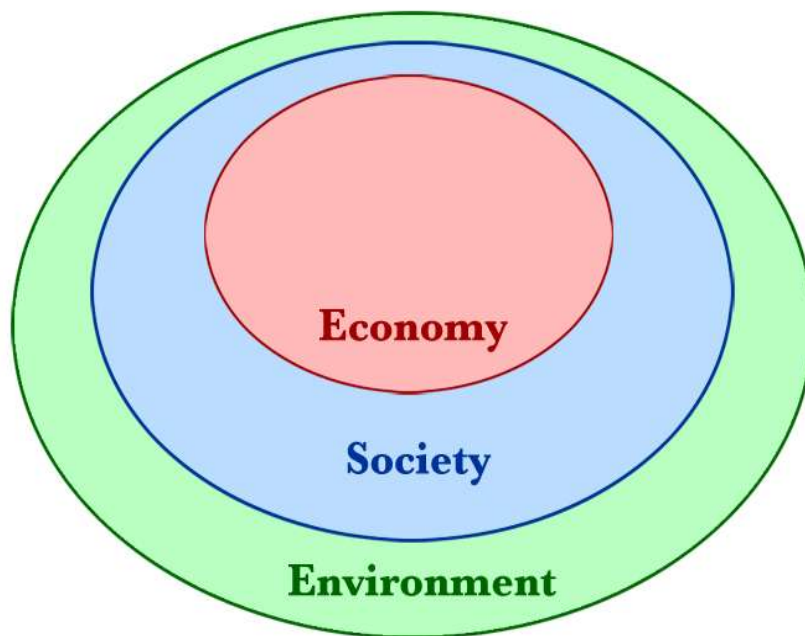
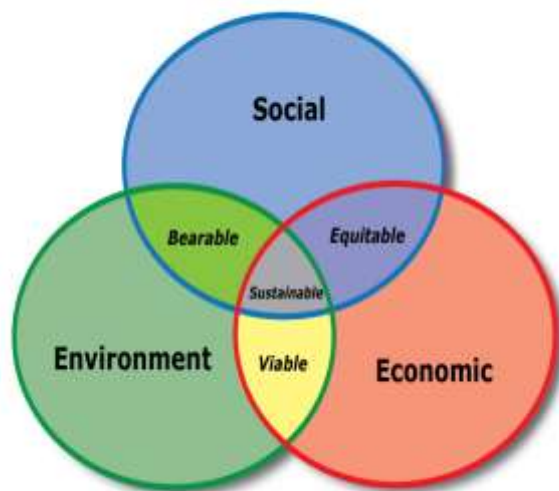
- The 2010 European Environment Agency, EEA report on Sustainable Resource Consumption¹¹⁷ shows Ireland's consumption at three times the EU 27 Average.
- The WWF and Global Footprint Network 2010 Living Planet Report calculates Ireland's per capita ecological footprint as the tenth highest in the world.
- The NESC report The Irish Economy in the Early 21st Century concludes that in the light of the findings of the Intergovernmental Panel on Climate Change *"the current path of global development poses unacceptable risks"*¹¹⁸

On a global basis, the notion of economies based on continuous growth has to be challenged and recognised as the road leading ultimately to the breakdown of human civilization. In brief infinite growth is not possible on a finite planet. Production and consumption needed to be informed by the environmental constraints.

Current Imbalance in what we in Ireland pay attention to



Bruntland - Moving to a Sustainable Balance

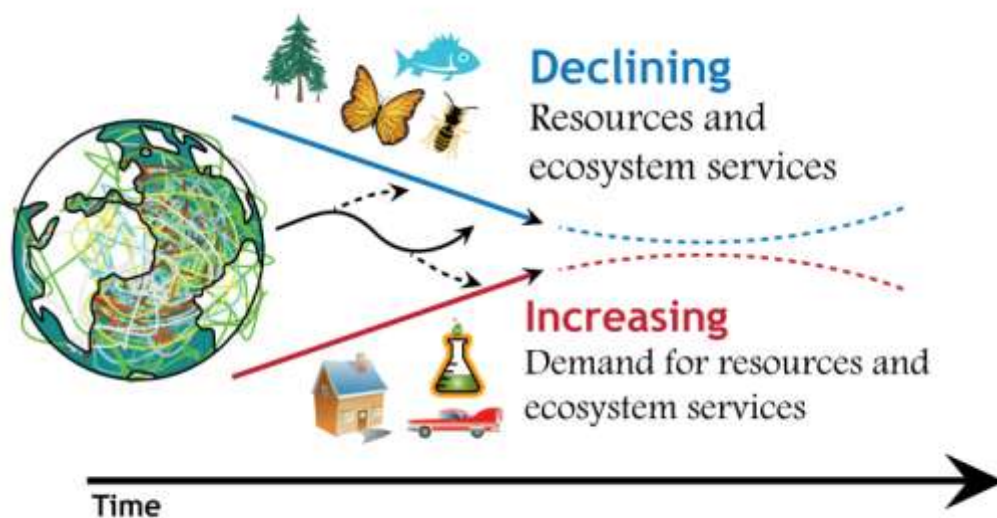


Human Society emerged from, and is entirely reliant for its survival on, the natural environment. Economic systems are created to serve society and can be changed by society. Human society on its present course, with a rapidly growing population,



and with an economic system based on an ever increasing use and abuse of natural resources, is destined to destroy the natural systems on which it relies.

- ❖ **What is required is recognition that we live in a system with finite resources, and that production and consumption patterns have to adjust given rapid population growth, depleted resources and the pace at which the biosphere and the atmosphere can regenerate.**
- ❖ **What is required is strong, coherent and integrated intervention to correct and re-balance our environmental, social and economic systems to produce a sustainable dynamic equilibrium.**
- ❖ **It is also clear that this may be our last shot at getting it right in the light of....**



3.3.3. The response of the Environmental Pillar

The Environmental Pillar will work with Government and the other Social Partners to explore how, in the context of a rapidly changing global environment, Ireland positions itself to prosper in a 21st century that will see a shift to a steady state economy and a fair and equitable society. In tackling our immediate economic problems it is essential we choose policies that address rather than exacerbate our environmental problems, and leverage the opportunities that sustainable management of our environment can also bring.

- ❖ **It is considered imperative that Ireland seizes this opportunity to do all that is required to ensure that when we arrive at 2020 and beyond – we can look back and say we took appropriate steps; we insisted appropriate action be taken, and sought development of a document and an approach which stipulated what actually needed to be done.**

In the context of the importance of the task in hand and extensive scope of the matter of sustainable development – **it is simply unacceptable that the first engagement and consultation on the proposed framework is via a published draft document, rather than a participatory approach to the development of the framework.** Such concern is all the more heightened in the

context of the limited expectations set at the event in the Aviva Stadium on Jan 24th 2012, namely that only minimal change to the draft document and the framework therein is considered feasible.

It is in effect an inauspicious start to the delivery of a programme of work to develop Ireland in a sustainable way – given the breadth of change and co-operation required from all sectors of industry, government, and civil society and the community and voluntary sector to deliver Sustainable Development effectively in all our interests; both for current and future generations of humans and the other species with which we share the earth's resources; and whose activities sustain it and us.

Despite the lack of a participatory process – the invitation issued within the draft FSDI on page 75 is taken at face value, namely:

"We hope that through the public consultation phase, organisations will not only comment on these measures but propose how they can partner with Government in delivering these actions and identify additional actions that they will undertake across business, industry, NGOs and communities."

To this end the frankness of the response should be considered in the constructive and positive light in which it is proffered and which is appropriate given the gravity of the issues at stake.

The Pillar reiterates that it welcomes this opportunity to comment and the hope that this is a start rather than an endpoint in the consultation and engagement necessary to deliver on the critical agenda of sustainable development in Ireland, and the complex challenges and opportunities that it creates. There has within the Pillar been extensive consideration of fiscal instruments, innovative solutions to manage externalities and common goods; an appreciation of a range of information deficits and how to address them; an expert appreciation of environmental vulnerabilities and opportunities on a local and national and international scale. This response cannot be a thesis on the Environmental Pillar's view and inputs. Moreover if we are collectively to be successful in achieving a sustainable development model for Ireland it is essential that key changes are identified and that solutions are worked out jointly to achieve them across the 3 pillars of partnership together with Government, mobilising from local to national level; and to leverage the competitive advantage that a truly environmental agenda for Ireland can deliver through sustainable development and management of our marine, terrestrial and atmospheric resources. A Framework for Sustainable Development for Ireland needs to facilitate same – and this current draft FSDI document fails to articulate if or how this will happen. When it does the Pillar will engage constructively in the best interests of the environment which provides for the sustenance of life itself, our society and society's underlining economic support systems.

4. Requirements for an FSDI

Theme: Confidence in Ireland's Governance & Recovery needs to be based on a fully functional FSDI.

Ireland's international reputation and credibility for responsible governance has taken a severe blow as a consequence of the economic crisis and underlying mismanagement at multiple levels which contributed to it; and which included individuals, institutions, regulatory bodies and governments.

In spite of the tough austerity measures adopted by Ireland and imposed on its citizens, their families and homes, their businesses and work places, their social support services, educational facilities, and environmental protections - international confidence in Ireland is both tenuous and problematic, and a barrier to economic recovery and independence as a nation state.

But as outlined in the Preface, the economic crisis is a nothing compared with the environmental crisis. Any economic recovery which does not take into account the environmental constraints will inevitably collapse; and compromise not only itself but the fundamentals necessary to sustain the place in which we exist and our society and economic systems operate. It is not the intention of this response to reiterate at length the critical statistics on the state of our natural environment which tell us clearly that not only can we not continue to produce the same level of goods, services and consequential emissions and waste products at the same levels we have been doing; or that given the planets depleted resources and regenerative capacity, or given our increasing population that we can no longer continue to consume in the manner or at the level we have been accustomed to in Ireland and the "developed" world.

A fundamental behavioural shift is required in both consumption and production. This is not necessarily bad economic news – it just means a change. A truly sustainable economy focused on the proper management of the marine, freshwater and land resource, biodiversity and atmosphere; is not only the key to recovery, but to a recovery which will not collapse in another 20 years; and which will not compromise the environment which we need to sustain not only economics - but life itself.

There is admittedly in the draft FSDI document a lot of information about the world's current situation from an environmental perspective. However it is structured and phrased in such a way that lacks the necessary sense of urgency and imperative to change, nor is it sufficiently localised for an Irish context.

For example, the focus of page 1 of the Draft FSDI is primarily on the economic crises, which while important are dwarfed by the environmental crises – as there will simply be no bailout possible. Therefore the view that we simply have to tidy up our environmental balance sheet, reduce our environmental liabilities and manage our ecological cash flow in the context of addressing the economic crisis is a totally misleading context.

This lack of focus at the start of the draft FSDI and the lack of urgency throughout is alarming in terms of articulating:

- Ireland's credible appreciation of the issues, and
- Ireland's appreciation and commitment to its national and international responsibilities in shifting to sustainable development from the current unsuccessful and ultimately unsustainable approach.

It ultimately undermines our credibility as a Governance Agent. It will not present our international peers, nor indeed the stakeholders who need to engage to deliver with it – a credible and responsible understanding of what sustainable development is about and what the move to it will entail for Ireland and Ireland's economic recovery and our ability to sustain that recovery based on a responsible management of the necessary resources. While many of the measures proposed if properly implemented would improve matters, there is a failure to plan and articulate them in a credible manner or to resolve the conflicts between them.

Theme: The headline 'Page 1' messages which will show we know what has to be done, how and why...

The October 2010 Living Planet report⁹ identified Ireland as having the tenth highest global footprint. The Living Planet report looks at the changing state of ecosystems, consumption of natural resources and the implications for the future of the world. Overall, the report concludes natural resources are being consumed faster than the Earth is replenishing them. On a global scale, people are now living lifestyles which would require one and a half planets to sustain, though there are significant differences between rich and poor nations.

The report, carried out by the World Wildlife Fund, examines the number of 'global hectares' — the amount of biologically productive land and water available per person on the planet — that countries need. Irish people on average use just over six global hectares per person, more than double the demand of some EU countries, such as Hungary and Romania. Irish per capita resource consumption levels and global foot impacts are at a comparable level to the US and Australia. Post boom Ireland retains in high per capita levels of energy consumption, consumer and household goods and clothing, meat and processed food.

Yet while the draft FSDI in the later back pages refers to the Living Planet reports – at the start of the document in the Introduction and context setting paragraphs - it obscures and indeed misrepresents Ireland's efficiency in critical matters in referring to Ireland's, energy intensity, or energy use per unit of GDP, as being the lowest among OECD countries.

This fails to recognize and adjust this measure not only for:

- the high volume of imports consumed in Ireland the energy to produce which is displaced and measured elsewhere; and
- the fact this is more a measure of the type of industries rather than of the virtue of the country. Product value and GDP contribution does not equate to an indication of energy used. Moreover the high energy industrial processes feeding these industries are carried out elsewhere. Life cycle analyses would paint a very different picture.

There is an onus of responsibility to ensure statistics are used and clarified properly to inform the policy and decision makers, and stakeholders of the real situation. The draft FSDI fails to do so at the outset and this is unacceptable.

Much of what needs to be said is buried in Section 3 at the back from pages 73 onwards. The critical briefing information on the crises which needs to be addressed, the key factors and imperatives and metrics to substantiate it – is simply not prominent enough on page 1 as it needs to be.

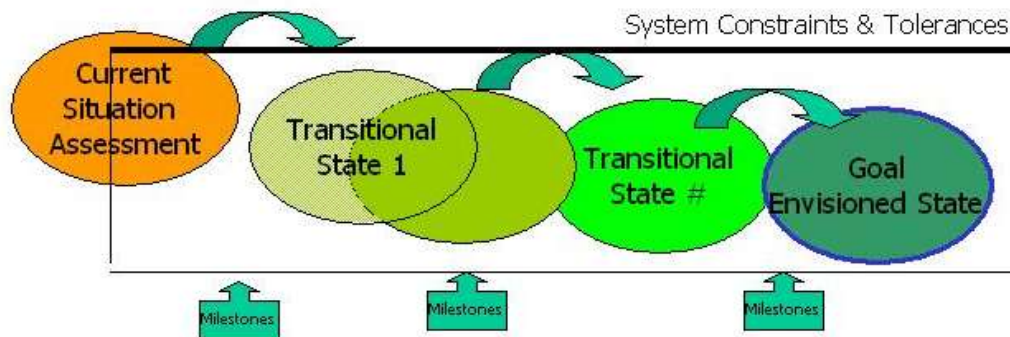
Environmental Pillar Submission to the FSDI Consultation

- ❖ The agenda and context needs to be reset at the very start of the draft FSDI to reflect the environmental issues which are at the heart of solving the challenge of sustainable development, together with the economic and societal imperatives.
- ❖ Additionally, a document of this depth and size requires a summary for Policy & Decision makers, similar to the summaries produced for the Global Environment Outlook GEO4 environment for development documents.

Theme: In any journey you need to know where you are starting from, where you are going and why and how well/badly equipped you are to get there and adjust..accordingly!



Strategic Transformation



The Draft FSDI's approach to this task of Strategic Transformation is appraised below in terms of the Current Situation Assessment performed, the Identification of System Boundaries and Constraints, Identification of Milestones; SMART objectives; Governance Mechanisms Proposed and the Envisioned Target State or Goal.

Strike 1: Failure to assess the starting point and status of equipment: Current Situation Analysis:

The extent of change required for Ireland to have a sustainable development model is also masked and distorted by a false evaluation within the draft FSDI of our current situation and starting point and what is vaguely acclaimed as “progress” over the last 20 years.

Why this is considered to be a false or unfounded assessment is outlined below – with reference to the following:

- Our current economic context where we find ourselves now in 2012 back at ‘square minus one’ from a starting point in Rio in 1992;
- The absence of a public review of the effectiveness of the 1997 NSDS;
- The fact that establishment of institutions purported as progress in the draft FSDI do not themselves correlate or equate with positive effect and impact;
- sustainable infrastructural issues, deficits and contradictions;
- Lack of effect and governance associated with policy documents purported as evidence of progress; failure to assess the strategic environmental impacts of policies and national plans;
- The lack of a hierarchy of plans informed and governed by Sustainable Development;
- The silo and satellite mentality to plans and recovery as evidenced in the Innovation Task Force;
- The risks associated with a parallel or contradictory course being pursued by the National Recovery Plan in light of the exemption as a Programme country from reporting on our Europe 2020 targets under the National Reform Programme;
- The failures to adequately and effectively transpose and implement one of the key tools to deliver on environmental protection – European Environmental Law;
- The fact that Agenda 21 in Ireland has been emasculated to a grant administration system;
- The system of representation of community and voluntary sector in participation in Government and Decision making – being undermined and failing wholly to take advantage of technological advances in information collation and sharing.

These are discussed further below.

The draft FSDI points to progress in a number of areas.

- In economic terms it refers to growth of GDP and GNP and rapid economic growth, with the fall-off of recent years noted. However even if viewed simply in economic terms - given that in Rio in 1992 Ireland was 100% in debt, and some 20 years later we are many multiples of that in debt; with unemployment rising; many in their 40s and 50s worried they will never work again, and many of those in their 20s and 30s emigrating – the assessment of ‘progress’ in economic terms seems unwarranted. This is particularly given the fact that not only has the effect of the ‘progress’ expired but the experience of the last 20 years has compromised the very fundamentals of our economic systems.
- Further references to progress in terms of provision of infrastructure such as motorways, public transport and water services again would be controversial in terms of being hailed as sustainable progress – given for example the on-going deficit in public transport, deterioration

in rail services, and numerous issues with water loss, mismanagement and water quality issues even in our major cities.

- Again in describing “progress” the document refers to policy development. The litanies of policy documents detailed in section 1.4 on page 9 such as “Smarter Travel” is not only incomplete in not considering climate adaptation and port policy for example; but also fails completely to assess the impact of these policies in effecting positive environmental and sustainable outcomes. The effect of these documents has been characterised sadly as **business as usual with Sustainable Development documentation attached, and cut and paste of “green” and “sustainable” as mere labels without guarantees in effect mere pre-fixes to words like ‘jobs’, ‘development’ etc.**

There is in brief quite simply no effective mechanism in Ireland for policy documents to govern decision making, administrative oversight and enforcement. The lack of an underlying legislative backbone to such policy measures, means associated plans and programmes bypass assessment by the Strategic Environmental Assessment Directive¹⁰. As a result the cumulative impact of these policies and their component elements is nowhere assessed.

Moreover, key decision making bodies like An Bord Pleanála in adjudicating on development initiatives, do not have an overall context in which they can assess the impact for example of another motorway on Ireland’s climate change management commitments – because while Smarter Travel articulates fine and admirable commitments to a modal shift toward public transport, walking and non-car based modes of transport – there is no big picture for how Ireland’s total transportation infrastructure will look based on such a policy; nor is there a hierarchy of policies and plans which helps such a decision maker resolve and/or overrides inconsistencies and contradictions in proposals, when a motorway is both in the NDP but inconsistent with the aspirations of “Smarter Travel”.

- ❖ **It is critical that the FSDI be articulated at a level of granularity which facilitates clarity on what is going to be delivered, how and by whom.**
- ❖ **The hierarchy of plans needs to be defined formally with the Sustainable Development Framework and Plan informing all other plans, policies, departmental remits and objectives of state agencies and bodies; and that such be underlined in legislation and subject to SEA.**

There is no point in developing plans – if we are not prepared to audit and assess their impact in line with the best practices and tools we have and which are proposed by Europe as critical tools to assist in the protection of the environment.

- **All development and planning strategies need to be measured in terms of their consistency with the FSDI and amended as necessary.**

There is also simply no point in developing a recovery plan for example – if it is not viable and inconsistent with the framework for Sustainable Development.

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DIRECTIVE 2001/42/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

The exemption from assessment on progress on targets required for Europe 2020 in the form of the National Recovery Plan, consequent on our embarking on the and governance with the troika, is unacceptable in terms of taking our eye off of the longer term priorities, and is in danger of creating a dual and indeed contradictory approach to recovery which will further distance our ability to comply with our environmental commitments and targets. It runs the risk that what we build will ultimately not fit a sustainable model – and we will have to start again or catch up with the rest of Europe, placing us at a competitive and environmental disadvantage. The sensible and responsible approach is to ensure we act consistently and choose recovery initiatives which fit the sustainable framework and model. This will only be done if the hierarchy of plans is specified with the FSDI as the overarching strategy and if Ireland captures and monitors its progress toward a sustainable economy; its Europe 2020 targets and the associated initiatives of the EU 2020 Strategy; in line with its fiscal reform programme; and incentivise transition to a more sustainable economy.

- **Recovery initiatives need to be measured in terms of their consistency with our FSDI, and their consistency and compatibility with the range of measures proposed and the critical environmental targets which need to be achieved, including our Europe 2020 targets particularly for resource efficiency, and considered and approved only if consistent with same – to ensure we do not waste valuable physical and intellectual resources building on sand and ultimately create an unsustainable recovery base.**

The Innovation Task Force's findings launched in 2010 – is a classic case in point. While the report to government constantly refers to an "innovation ecosystem" - consideration for the environment stopped there. The model considered critical elements such as education, research, fiscal incentives, immigration policies etc in considering how to stimulate recovery via innovation – but did not for one moment consider or provide for the consideration of the need for underlining principles to permeate all of these components needed to focus on protection and sustainable management of our environment. Our most successful indigenous industries, Agri-Foods, Tourism and the equine sector rely totally on the quality of the environment. In building a recovery we have to protect the essentials necessary for what is established and successful. These are sectors which not only provide hundreds of thousands of jobs and critical revenue – but are also fundamental to the way people in Ireland live, and their way of life. The unique selling point and competitive advantage from the quality of our environment, the low dioxin levels in our milk and our current non-GMO produce are critical assets to people's livelihoods, way of life and our economy and environment. It makes no sense to provide for an Innovation Framework stimulus package which does not first and foremost inform itself of the critical priority of maintaining and supporting our most critical resource – the environment. This type of satellite, silo thinking and planning has to be stopped. **The Framework for Sustainable Development will not be a Framework for Sustainable Development if it is not related, structured and positioned appropriately relative to all other plans, as the primary governing strategy.**

- A further area where it is submitted that an erroneous impression of progress is given is in the context of the extensive number of complaints and breaches against Ireland for failures in respect of the transposition and implementation of European Environmental Law. The general assessment of progress also seems unwarranted. Ireland's on-going delay and failure to implement the Aarhus Convention speaks to a underlining fear of what fair and equitable access to the law would mean for the state, its institutions and industry. Those compliant with the law – which must be the most fundamental tool in the toolset required to protect what is common to all and necessary to life – should have nothing to fear from the law – but such does not appear to be the case in Ireland.

- ❖ **Effective transposition and implementation of EU Environmental Law must be addressed as a priority.** This will entail the effective provision of education for decision making bodies in particular including the Judiciary; provision of administrative oversight and enforcement structures and processes to complement and support effective implementation
- Another area of critical concern to the Environmental Pillar is the issue of effective consultation and participation. Agenda 21 a key initiative and implementation tool arising out of Rio – has in Ireland has been emasculated to a local grant administration system; with the system of representation of community and voluntary sector in participation in Government and Decision-making – being undermined. There is a failure to leverage the incredible revolution in communication which has arisen since 1992 with the advent and mainstreaming of the internet in our every way of life. In this context there is also slowness in many areas to take advantage of technological advances in information collation and sharing to support the delivery of sustainable way of living and sustainable decision making at all levels from the individual to the Government.
- ❖ **Meaningful participation must be facilitated and Agenda 21 put back in centre stage.**

It would also make sense in determining progress to evaluate the effectiveness of the original response to the Rio Declaration, Agenda 21, the Forest Principles and the 1997 NSDS, and to include learning from that experience. The 1997 NSDS set out policies and objectives for a number of sectors namely agriculture, forestry, marine resources, energy, industry, transport, tourism and trade. There was an overall failure to address land-use planning and implementation of sustainability at local authority level – the fundamental organ of decision making in Ireland. Breaches of policies were ignored – some with devastating consequences. For example - one simple objective of the original strategy stands out as having had the potential to significantly mitigate the resulting economic crisis and Ireland's generally dismal environmental record – *'No State funding will be provided for infrastructure in the event of over-zoning'* (Pg 13)¹¹. In the subsequent years Councils across the country embarked with impunity on a zoning frenzy with more than 44,000 hectares of land zoned for housing alone – at least 32,000 hectares more than was actually needed – without any sanction from Government. The challenge to change rhetoric and paper commitments into effective action and enforcement of policy is the challenge this framework has to both articulate and facilitate delivery on.

In summary the draft FSDI has failed to accurately characterise the starting point from which we must advance. References to "progress" purportedly already made on the journey toward sustainability seem unjustified, and are totally non-specific in terms of significant and relevant change towards a vision of sustainability. Progress must be founded on a balanced, approach to economic, social and environmental development and management.

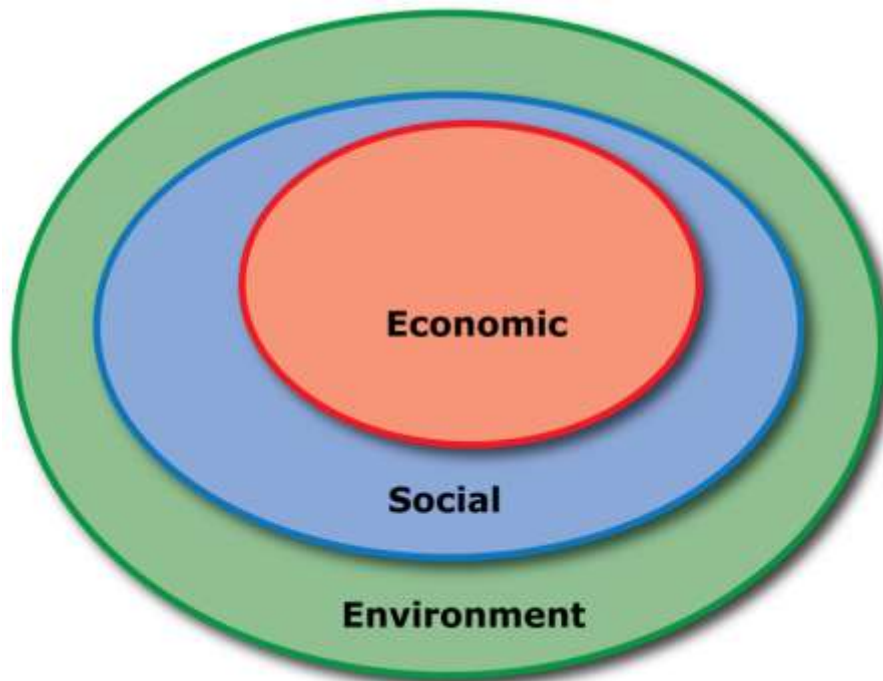
The draft FSDI document has an obligation to set an appropriate context from the beginning but in fact the early emphasis is entirely economic in terms of specifics. It presents vague, unevaluated and unmeasured effects in relation to purportedly positive environmental impacts and moves to sustainability from various unevaluated measures already in play. In setting out on a journey you need to now where you are starting from – where you want to go and how to equip yourself.

Strike 2: Failure to identify the constraints for the journey and destination.

¹¹ Sustainable Development – A Strategy for Ireland 1997

<http://www.environ.ie/en/Environment/LocalAgenda21/PublicationsDocuments/FileDownload,1825,en.pdf>

The draft FSDI does not convey the imperatives or inter-dependencies of environment, economics and society, and its understanding of this concept; and the opportunities and challenges which it presents. All of that needs to be done on “page 1” and this it singularly fails to do – the emphasis entirely falling to the challenge of the economic crisis in the context set for the start of the document.



Human Society emerged from, and is entirely reliant for its survival on, the natural environment. Economic systems are created to serve society and can be changed by society. Human society on its present course, with a rapidly growing population, and with an economic system based on an ever increasing use and abuse of natural resources, is destined to destroy the natural systems on which it relies.

The reality is: In a financial crisis there is a Troika for the bailout

There is NO “Troika” for the Environmental Crisis.

No International Nature Fund, No Central Nature Bank, No Earth Commission equivalent to the IMF, the ECB and the EU Commission.

We are in danger of tipping the environmental balance beyond the point where we can return to an equilibrium; and there simply won't be a bailout option available to restore equilibrium

Page 1 of the FSDI needs to address the constraints to our existence on the planet and our way of living, consuming and producing in Ireland.

❖ **At the outset the FSDI needs to identify the limits and constraints which need to be measured and monitored.**

Innovative thinking on planetary boundaries from the Stockholm Resilience Institute based in Stockholm University – addresses the upper limits or tolerances which we have to not only be cognisant of but use to inform our decisions, choices and behaviours on a macro and microeconomic and social scale¹². Planetary boundaries have been identified in areas such as climate change, stratospheric ozone, ocean acidification, biogeochemical nitrogen (N) cycle; phosphorus (P) cycle; global freshwater use; land system change; and the rate at which biological diversity is lost. It additionally identifies the need to measure chemical pollution and aerosol loading. This presents a more meaningful and scientifically relevant view of the impact of our anthropogenic effect on the planet's ability to absorb our impacts and provide for our demands, and those of the species with whom we share the planet, and whose existence is part of the complex systems which maintain life, even down to the critical role anaerobic bacteria play in capturing and returning nitrogen to the air as a critical ecosystem service for life.

Effort needs to be expended on identifying and agreeing a relevant set of boundaries/ factors for which we need to be aware of upper tolerance limits and which we need to manage against exceeding. These boundaries need to be defined at a global and national level. Awareness and focus then needs to be created at local levels – with local communities motivated and enabled to understand the positive trends in improving their contribution towards them – for example reduction in their town's carbon footprint consequent on energy consumption and transport usage etc. In this context, community based initiatives such as Transition Towns, which originated in Kinsale, should be given strong government support.

These boundaries and the critical targets with ensuring we do not trespass beyond them need to be localised for an Irish context, both in terms of current baseline information and identification of the change targets required. In many such instances the data exists or can be obtained, but the FSDI has wholly failed to address the need to identify, measure and manage against critical planetary constraints in a meaningful way, even in respect of the headline challenge of climate change.

Strike 3: Failure to identify the critical milestones for the Journey:

The necessary focus on boundaries and constraints, discussed above, is completely separate to the identification of indicators of sustainable development. The draft FSDI acknowledges the need to develop such indicators and points to work done on which they intend to build – but despite the acknowledged importance of these same Sustainable Development Indicators – there is no timeframe specified for their development, and no evaluative criteria is specified for the deliverables intended.

Strike 4: Failure to identify the Vision and Motivations for transition

Finally Page 1 not only needs to focus the mind on the extent of change – but also the extent of opportunity.

"Investing for the Future: More jobs out of a greener EU budget" ¹³ states the following:

"If a "green budget" were realised from the next MFF 2014-2020, with only 14% of the total EU Budget (a yearly investment of €14.75 billion, based on current Commission

12 <http://www.stockholmresilience.org/research/researchnews/tippingtowardstheunknown.5.7cf9c5aa121e17bab42800021543.html> [Accessed 20/02/2012]

13 <http://www.eeb.org/EEB/?LinkServID=41FFA309-5056-B741-DBFD725B2A886A5F> [Accessed 20/02/2012]

proposals), these four sectors could create/sustain more than half a million jobs (Figure 3).

In comparison, currently the CAP and the Cohesion Policy, making up about 78% of the current budget (€140 billion per year) only create/sustain a bit more than double of that amount.

This suggests that shifting investment from current patterns of investment within the Cohesion Policy and the CAP to green sectors would increase job creation per euro by a factor of three (320%).”

Ireland’s whole recovery and reform program needs to be informed by the imperatives of sustainable development, economic, social and environmental; but also the good news and the opportunities there are for us to work together to leverage the competitive advantage. Ireland would be in a unique position in terms of quality food production, greener energy, and an eco-tourism industry which complements our indigenous farming, agri-food and fishing sector, if these were founded on good sustainability principles and practice.

Strike 5: Failure to define the Goal and roadmap

Theme: Need for a vision, a roadmap and transition strategy..,

As in any strategic transformation document – the FSDI should include:

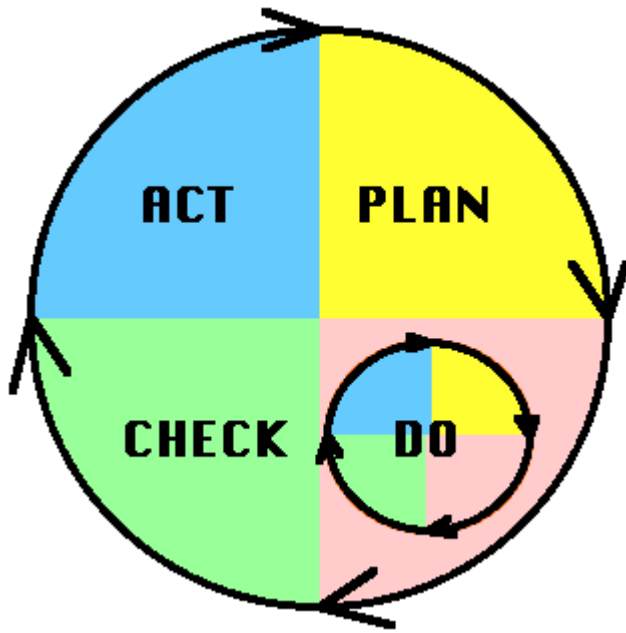
- an inspiring vision and a credible destination;
- an accurate and holistic appraisal of where we are now;
- relevant benchmarks
- a credible roadmap to transition us from where we are to where we want to be;
- mile-stones and metrics to evaluate and guide our progress toward the destination.
- An annual Plan-Do-Check-Act cycle

This then would form the basis of a framework which would inform every step of our economic, social and environmental recovery, and create confidence in our management both at home and abroad. This Draft FSDI document does not do this.

The draft FSDI fails to articulate the destination, it fails to accurately and honestly appraise where we are now and how well we are/aren’t doing on the general journey, it does not lay out a credible coherent roadmap or itinerary for the journey, and the actions required to get us there; it fails to identify sufficient relevant milestones and metrics to guide our progress. It must also incorporate an annual PDCA cycle in the Strategy and for the implementation of each of the:

- 39 national strategies
- 18 international agreements and policy statements
- 27 legally binding international instruments

that are used as metrics for this overarching FSDI.



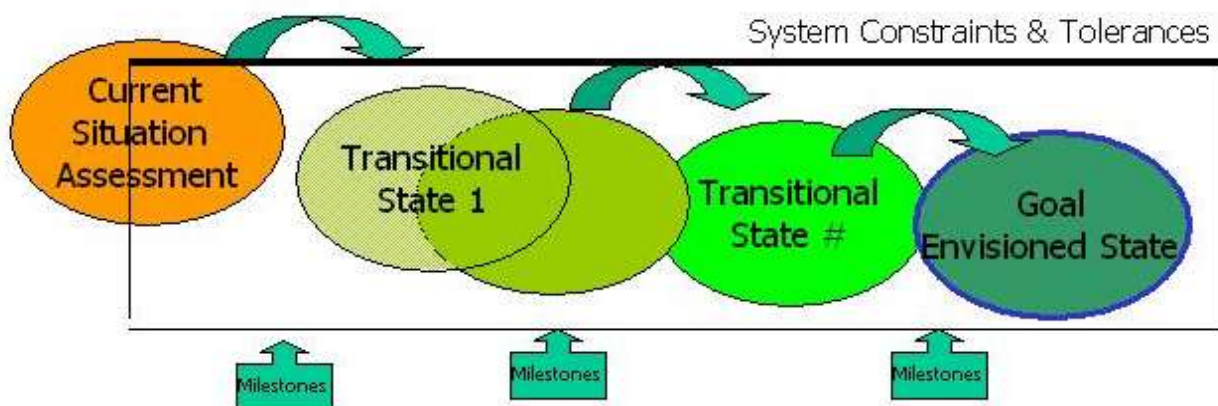
PLAN: Establish or revise the Strategy components based on a clear vision of a sustainable future

DO: Implement the strategy and its components and measure its performance

CHECK: Assess the measurements and report the results to the Oireachtas

ACT: Decide on changes needed to improve the Strategy through a public participatory process

Strategic Transformation



These fundamental elements of strategy and delivery methodologies already addressed above are further explored below.

Strike 6: Failure to define metrics which evaluate achievement of the Goal.

Themes: ...What will all the stipulated targets actually amount to? Are they a relevant substitute for an holistic envisioned model of Sustainable Development?

While there are a range of targets identified with varying degrees of specificity and delivery timetables in the FSDI – the consequential vision for Ireland’s Sustainable Development Destination is not clear. Nor is it clear if Ireland was to somehow deliver 100% of these targets if we would actually be operating in a sustainable fashion. **In brief it is not clear what the sum of delivery on all of the specified targets would actually achieve, and the sufficiency of same in terms of a model of sustainable development.**

Instead of considering the goal of ‘Sustainable Development’ a potentially useful analogy to highlight the concerns above regarding the significance of the targets set - might be that of a goal of ‘being healthy’.

Based on the understanding that obesity is bad for your health, you set a target weight loss of 2 Kilos.

So the question then is if you set a target weight loss of 2 Kilos and achieved it would you then have achieved your goal of being healthy?

Or are there other factors which influence your health that would also need to be addressed potentially including: legacy issues arising from the period of obesity; issues which contributed to you being obese in the first instance; other pathological or physical issues which have no relation to the obesity issue?

In much the same way as the health/weight loss analogy above - the FSDI identifies certain initiatives and targets – but their sufficiency and contextualised contribution to a Sustainable Development Model for Ireland is nowhere evaluated or justified in the draft FSDI.

Additionally, the issues arising from historic mismanagement of environmental resources may require more than just setting a target around a key indicator to reduce on-going levels of damage. **There is a failure in the FSDI to identify environmental deficits in particular and to propose initiatives that will address them holistically and in an integrated, coherent and credible and scientifically informed way.**

- ❖ **Environmental deficits need to be identified and initiatives proposed to redress them holistically and in an integrated, coherent and credible and scientifically informed way.**

Strike 7: Failure to Provide credible Governance structures to resolve conflicts, completion and mandate the change.

Theme: ...Need for credible Governance Solutions and Programme Management

While the structure of context, challenges, gaps, targets and commitments and measures /actions is not entirely consistent across the sectors treated in the FSDI – it is a useful and appropriate approach.

However in the context of a country that suffers from chronic “implementation deficit disorder”, the following general comments pertain to the entire document:

- While the contextual rhetoric in many cases is good, the consequential measures/actions and associated performance metrics stipulated too often have been emasculated and lack the fundamental characteristics for management and deliverable actions namely to be SMART, Specific, Measurable, Accountable, Realistic, Time-bound.
- In many instances – the level of the proposed target relative to the current state is not addressed as there is insufficient baseline information, and a failure to require baselines be provided together with associated analysis.
- This is nowhere more evident than in the area of human health. There remains a need to provide comprehensive baseline information in relation to human health in Ireland, to capture environmental factors associated with chronic illness and by contrast good health, and to provide analysis on trends. Such underlying data concerns are also of particular relevance in the section on Natural Environment, including Marine and Forestry.
- There is also an issue with the language in the draft such as ‘continue to improve’ and ‘further enhance’ or ‘further develop’ which imply that more has been done than is in fact the case. If we are setting out on a journey to a destination and want to know which direction to start driving in – it is imperative to be honest about where we are starting from; and if looking at incremental trips or targets to know how much that will contribute to the overall journey.
- ❖ **Ultimately what the Pillar is seeking is that the document delivers what its title implies – a framework for the development of a sustainable Ireland – based on the fundamental management principles and tools of business strategy to be applied to what is the business of creating a truly sustainable Ireland. These include:**
 - **An accurate and honest “current situation analysis, CSA**
 - **A SWOT analysis, Strengths, Weaknesses, Opportunities and Threats**
 - **A defined and described and measurable Goal**
 - **Identifiable and Measurable Milestones against which to plot the transition from one reality to another**
 - **SMART interim actions, with specified metrics to determine whether they have been achieved**
 - **An annual plan-do-check-act cycle, reporting to the Oireachtas**
 - **Identification of necessary complimentary initiatives to achieve required outcomes**
 - **Mechanisms for resolving of resource conflicts and policy conflicts**
 - **Risk Assessment and Risk Mitigation Strategy, including an honest assessment of one’s capacity to deliver**
 - **Communications & Mobilising Strategy**
 - **Governance Framework, to include the mind-set, methodology organisation and legislative instruments necessary to deliver the goal.**

Theme: ...Governance and conflict resolution, relationship to other plans...

In much the same way as a major corporation has to manage competition for resources, and for competing initiatives, so a portfolio management approach is required is required to shift Ireland to a Sustainable Development mode. No such coherent governance process and approach is articulated.

Vague statements about oversight by an appropriate Oireachtas Committee are proposed in the Implementation section of the draft FSDI. Leadership of the FSDI initiative by the DoECLG is proposed. While it clearly has a particularly critical role to play, it does not have the historic authority nor current structure to drive change across a range of sister departments and their associated agencies.

The governance solution insinuated or implied in the draft FSDI is one of horizontal integration across departments – with no effective enforcement or driver.

❖ **Governance needs to include process and empowered structures.**

Traditionally, only the Department of the Taoiseach is considered to be so positioned. This is a cross-departmental initiative, and needs to be driven from the top.

Notwithstanding the need for delivery of key initiatives by and through Government there is also a need to be realistic about the capacity of Government to deliver. In this regard there is a need to :

- a) Recognise the political nature of Government.
Lobby groups work very effectively in Ireland to secure their interests often at the expense of the greater good. The transitory nature of Government and election driven focus on certain initiatives and results has also compromised longer term interests. There are undoubtedly issues with accountability of "Government".
- b) Honestly appraise the track-record on integration in decision making; delivery; policy conflict-resolution across state agencies and Departments.
While greater cohesion appears to have been achieved in responding to the recent economic crisis – conflict resolution and cohesion particularly on environmental matters is an issue. Fiscal management is more tangible and quantifiable in terms of net checks and balances and effect of transfers. There is a therefore a critical need to acknowledge the conflicts in targets particularly those arising from other plans, and differing departmental interests, and the risks of failing to do so.

There is a failure in the draft FSDI to identify and address these issues and the associated delivery risks. What the solution is – is not an easy answer – but there is a singular failure even to pose the questions and to schedule an activity to find an answer to support an effective governance mechanism.

❖ **Detail a robust and credible Governance structure and associated process**

Additionally as highlighted earlier:

- ❖ **There is a need to clarify where this document and framework sits in the hierarchy of decision making in Ireland.**
- ❖ **The framework not only needs targets, but enforcement mechanisms and penalties for non-achievement. The draft FSDI does not have such compliance incentives, and it needs them.**

The original Rio Earth summit concluded that there was a need for “beyond growth” indicators to evaluate and communicate the wellness and effectiveness of our world and systems. Proposals to provide parallel indicators to traditional measures such as GDP and GNP are considered problematic as they run the risk of being side-lined, particularly in the context of the intense fiscal focus.

- ❖ **Further concerted focus is required to identify adjustment factors to deflate the comfort associated with GDP & GNP where they incorporate unsustainable activities. New indexes and measures which shift the focus and priority to sustainable industries, sectors and activities and which mainstream the focus on the status of environmental resources in terms of the sustainability need to be provided for and used across government.**
- ❖ **Greater awareness is needed on the factors included in GDP and GNP currently where number of people in prison or treated in our health systems are included as positive elements, while in fact these reflect ills within our society, and underlining health issues for our population. Clarity is needed on measuring what is good and what is wanted, and what is bad and what we wish to eliminate or reduce.**

Much of the conflicts and issues arise out of the treatment of constrained and critical resources, including the capacity of the environment to absorb the impact of our activities and the anthropogenic issues arising which compromise the basic elements essential for life air, water and quality.

There is a general failure historically to commit to necessary fiscal instruments and tools to tax in a way which encourages good environmental choices, both in terms of consumption and indeed production and post-consumption or disposal/waste management. The draft FSDI creates no confidence in a change or migration from dysfunctional measures and contrary incentives and perverse taxes as it uses vague statements about appropriate legislative measures. It fails to systematically identify perverse taxes and subsidies and to specify reform of them – or even identify this as a task to be done.

- ❖ **There is a need to systematically identify perverse and dysfunctional fiscal measures which promote and support unsustainable practices, and eliminate them.**

There is also a failure to explore or even schedule as a critical task – exploration of alternative methods and structures to assist in the management of what might best be described as “the commons” – goods such as freshwater, air, marine resources etc. These are the goods which we consume at unsustainable levels and which compromise not only our quality of life but the very essential elements of life. It is not clear whether ideas such as Trusts have been robustly examined or not. It would seem that there is in them the opportunity to avoid and side-step the 'political fracas' and consequential failures to act to protect such goods and services in the common good through the establishment of trusts. Trusts could transcend political tenures; and be charged with and rewarded for effective sustainable husbandry; provide for free-allocations of the good or service and so recognise common ownership and interest; and generate responsible consumption patterns through effective charging for the good or service which in turn could be used to protect, regenerate the resource and distribute to the current generation to create a collective incentive and appetite in the effective stewardship of the resource; and in so doing provide a appropriate mechanism for charging for the externalities of so many of our production processes, and drive real resource efficiency.

- ❖ **There is a need to systematically identify “commons” which need to be priced and managed to protect them and to systematically assess alternative solutions to address this and implement a new mechanism to protect and maintain them sustainably.**

Eurostat has acknowledged the need to work on ecological indicators. Further comment on this requirement and on the work of The Economics of Ecosystems and Biodiversity, TEEB¹⁴ which is focused not on calculating the intrinsic and intangible value of nature, but rather is focused on data which informs and balances decisions involving the use of natural resources is raised later below in discussing measures/actions required.

- ❖ **There is also a need to stipulate how challenging conflicts will be resolved and to provide the data necessary to facilitate informed decision making.**

An example would be the conflicts between maintenance of hen harriers and provision of wind energy. The need to have accurate data on the conservation status of protected species bats who provide an important insect control function, but where fiscal restraint is compromising the funding for studies necessary to inform our understanding of the status of the species and how significant development proposals may or may not be to the overall viability.

Theme: Credibility of Programme Structure and Priorities..

There is a real concern that the 'big asks' are deferred to 'the longer term' group of measures. It is not evident from the programme of work proposed if the interim steps scheduled for the short and medium term position us to be able to deliver these longer term requirements, or indeed to buy the time and capacity to defer these items to the longer term; or why in fact they have been assigned to the longer term slot to action. No logic for the programme structure has been identified.

- ❖ **It is essential that the rationale for the programme priorities, sequence and interdependencies of initiatives is detailed.**
- ❖ **It is essential that our ability to defer certain initiatives and delivery on certain targets is explained adequately in the framework.**

Theme: ...Need for Secretariats & for Mainstreaming of environmental considerations into our economic & societal thinking & behaviours....

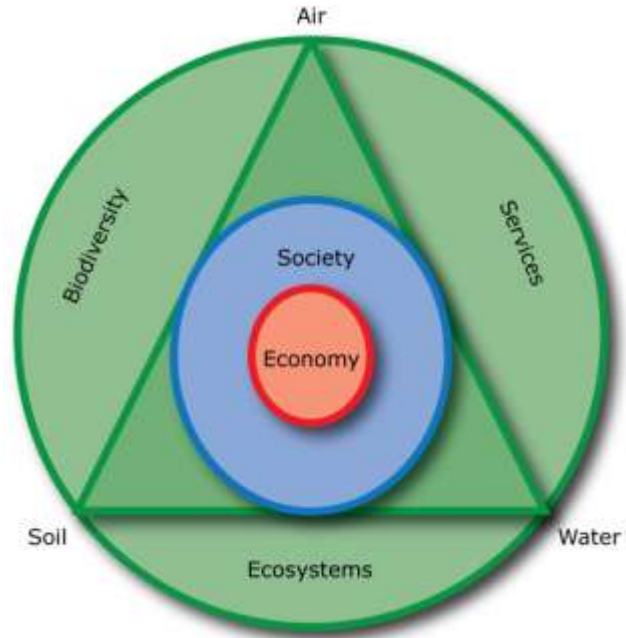
The extent of information to facilitate informed decision making will require extensive involvement from the EPA, CSO and NESC. The latter organisation, NESC now includes some of the work of Comhar (the National Sustainable Development Council) since the disbandment of the latter. **The Pillar welcomes the inclusion of Environmental Representation on the National Economic and Social Council and looks forward to the Sustainability Perspective being reflected within and by NESC.** However the draft FSDI on page 2 quotes from the NESC Oct 2009 report wherein Ireland's crisis is described as 5 dimensional: Banking, Fiscal, Economic, Social & Reputational. **The failure of NESC to update its October 2009 report to adequately reflect a sixth dimension of crisis, namely the environmental crisis facing Ireland remains a concern for the Environmental Pillar, and indicates a singular failure to appreciate the underlining importance of the environment in our economic and social viability.** Without a healthy and sustainable environment, society our economic systems will collapse into chaos. It is not only the glue, the raw materials and source of life essentials, but also the cocoon which envelopes and maintains the whole of our human systems. **The analogy of a "Russian doll" and concentric circles is often used to represent this concept and it is simply intellectually untenable to**

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<http://www.teebweb.org/> [Accessed 20/02/2012]

believe that society or economy can maintain their integrity in the absence of a sustainable environment. It must be a fundamental part of the FSDI and a basic premise for all decision-making by government that the economic system cannot outgrow the society that created it and that human society cannot expand beyond the limits set by the natural environment.

Therefore the image of circle in which society and economics nestle but whose circumference and integrity is maintained by a sustainably balanced operation of the fundamentals of life, simplistically characterised as Air, Water and Soil; and which maintain and are maintained by a complex system of ecosystem services – is probably more reflective of the dependence society and economics have on the environment.



There is a need to identify compelling and intuitive image to mainstream the environmental perspective and to communicate the imperative to change behaviours to protect and sustain it across all levels of society.

- ❖ **Communications and education programmes need to be supported to deliver on such behavioural shifts and their effectiveness needs to be rigorously assessed.**
- ❖ **All educational programmes from Kindergarten up to third-level need to include consideration of the finite nature of resources and respect for same.**
- ❖ **All third-level and educational programmes need to integrate and mainstream sustainability into their curricula.**
- ❖ **To facilitate the necessary mainstreaming of the environmental perspective and the critical matter of the sustainability agenda in our recovery – the refocusing of the remit of NESD should be complimented by an appropriate renaming – to the National Sustainable Development Council, NSDC.**
- ❖ **Similarly the legislative remit and branding of the EPA should be addressed to align it with a revised remit to deliver and protect a “Sustainable Environment” as its priority; so it becomes the Sustainable Environment Protection Agency, SEPA.**

Theme: Specific sectoral deficiencies

The areas of Marine, Aquaculture, Forestry and Human Health are marked in terms of the deficiencies in their treatment and are not even identified as areas which require further assessment and specification. In brief while further comment is provided on same in the measures commentary which follows this over-arching section – it would be remiss not to include among our primary recommendations detailed in this section the following:

- ❖ **The areas of Marine, Aquaculture, Forestry and Human Health require specific focus to collate essential baseline information and trends, and further assessment and specification.**

Conclusion to Section 4:

As stated before much of what is most relevant in the FSDI document in terms of the imperative to deliver is buried in later pages and the delivery approach and delivery capacity is buried in the back of a long and dense and detailed document, in 'Section 3 Implementation' and 'Section 4 Measuring Progress'. But even there where the rhetoric is good the measures/actions proposed fall short of what can be considered as necessary to ensure delivery. We do acknowledge that in the context of the economic crisis there has been a greater cohesion in the response across departments – and a similar result and indeed better result is required in the context of the greater sustainability crises.

But one has to be realistic about the chances of change when one considers even the basic structure of the Draft FSDI which is supposed to drive change in our attitudes and approach to sustainable development and the emphasis therein. For example on page 1 of the Introductory section under the sub-title 1.2 "Sustainable Development is a priority for Ireland" the first 3 paragraphs are dedicated to the consideration of the economic crisis alone, **with mention of the environment and society only on the fourth last line of page 1.**

On pages 76, 77 and 78 – the following key points are articulated around the critical imperative of climate change as detailed in the Stern Report, the economic advantages and imperative of a more environmentally sustainable approach, the implications of inaction not only for quality of life and indeed for human existence.

"The Stern Report ¹⁵ demonstrates that the economic costs of effective and timely international action on climate change would be far outweighed by the costs of inaction – potentially up to 20% of global GDP.

"Our actions over the coming few decades could create risks of major disruption to economic and social activity, later in this century and in the next, on a scale similar to those of the great wars and the economic depression of the first half of the 20th century. And it will be difficult or impossible to reverse these changes. Tackling climate change is the pro-growth strategy for the longer term, and it can be done in away that does not cap

the aspirations for growth of rich or poor countries. The earlier effective action is taken, the less costly it will be”¹⁶.

On page 75 of the FSDI the following is stated:

"We hope that through the public consultation phase, organisations will not only comment on these measures but propose how they can partner with Government in delivering these actions and identify additional actions that they will undertake across business, industry, NGOs and communities."

As articulated at the outset – the Environmental Pillar is very willing to participate to assist in what is undoubtedly a complex, challenging and fraught activity – but one which is essential for us all to work together on. It is unacceptable that there has not been greater public participation initiated and promoted by Government in the development of this framework and in the context of the economic crisis which has crystallised in the last 4 years and the additional complexities that it presents. It is the considered view of the Environmental Pillar that it does not present a credible platform from which we could simply focus on the actions proposed. Fundamental failures in the draft Framework need to be acknowledged and addressed, and the programme of work structured in line with the imperatives to address, tackle and resolve the behaviours and activities which compromise our sustainable existence, in a holistic programme of change involving effective communication, educational reform, effective consultation and participation, rigorous and effective fiscal reform to incentivise behaviours and change behaviours and choices, innovative new structures and approaches to deliver on protection and sustainable management of resources, targeted and rigorous data collection and analysis to inform our decisions and understanding of the status of our environment.

5. Recommendations on Sectoral Measures as Proposed in the draft FSDI

The over-arching comments in Section 3 of our response should be taken as a given in relation to each of the sectoral sections dealt with below, including:

- ❖ **All government departments that were involved in the development of the FSDI should take responsibility for ensuring on its delivery and should have their signatures and logos attached to the final document.**
- ❖ **The need to establish a hierarchy of plans and policies in which Sustainable Development is uppermost and is used to drive and inform other plans and policies is viewed as critical.**
- ❖ **There is a need to establish a legislative backbone to sustainability plans and policies and all consequential recovery plans, energy plans, climate change plans, transport, agriculture, biodiversity management, health, marine etc.**
- ❖ **There is a need to assess the impact of such plans and audit the effectiveness of their proposals through SEA, EIA and RIA, and to monitor and manage to the required set of results using appropriate PDCA cycles.**
- ❖ **There is a need to realistically evaluate a) the current situation as the starting point from which the transition must occur; and b) the tools and processes available and their fitness for purpose, and revise them accordingly**
- ❖ **There is a need for a realistic, credible, capable Governance framework to deliver on the extent of change required in both consumption and production behaviours and patterns and to leverage the opportunities available in truly sustainable development.**
- ❖ **There is a need to specify Specific, Measurable, Accountable, Realistic and Timebound, SMART, measures or actions and to construct a credible sequenced delivery programme with events and targets based on the need for a transition to sustainable development.**

5.1. Re Draft FSDI Section 2.1: Sustainability of public finances and economic resilience

In the context of work undertaken and consolidated by the ENGO community from 2007 and onwards – a range of fiscal innovations were identified as SMART taxes - with the objective of addressing dysfunctional initiatives, perverse taxes and problematic issues within our fiscal systems. The Environmental Pillar would welcome the opportunity to engage further to evaluate how some of this innovative thinking particularly around refined views of Site Value Tax, Land Value Tax, together with advance theories regarding the distribution of Fiscal Stimulae through individual spending power rather than institutions; the establishment of Trusts to regulate, manage and protect sustainably “the commons” – for natural resources and services such as air, freshwater, seas, woods etc. In the context of the failure of traditional approaches to correct issues within our systems which have been proven to be unsustainable both from an economic and environmental perspective – there is a need to ‘wake up and smell the coffee’ and try something different.

In brief there is a need to:

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- Avoid issues like land-banking;
- Release land for productive use,
- Provide effective return for public investment in infrastructure rather than drive iniquitous gain of an individual at society's expense;
- Provide effective fiscal stimulus to the economy;
- Provide for protection and sustainable use of resources which belong to all the earth's inhabitants and which are necessary to maintain the essentials of life through identification and protection of "the commons"
- Eliminate dysfunctional subsidies, taxes and incentives which run counter to what is required to manage resources sustainably and encourage sustainable behaviours and choices
- Use fiscal instruments to stimulate, reward and incentivise positive sustainable choices and changes in behaviour and disincentives and penalise behaviours and choices which compromise our overall sustainability.

The Euro Crisis has become all absorbing for politicians and media alike. The Environmental Pillar is fully cognisant of the practical challenges this presents – but it is as nothing compared to the looming environmental crisis – particularly when one takes into account its unreal/virtual nature. The Environmental Pillar in recognition of the economic challenges have examined the very practical solutions that have been developed by innovative economists i.e. Modern MT such as Randal Wray, Warren Mosler, Stephanie Kelton, Bill Mitchell, Bill Black and others linked to the non neo-liberal perspective such as Yanis Varoufakis, Steve Keen etc. Practical solutions are available.

In summary the economy is not a given, it is a human construct. It is perfectly feasible to re write the software of the economy by rewriting the codes of the financial system used by our current economy to serve our democratically-decided social and environmental goals. It is a major flaw in the draft FSDI that it prioritises the rescue and maintenance of a flawed version of our financial system as if it is the economy and our environmental and social goals that MUST fit in - or else. What is the 'or else'? Is the 'or else' the reform of the financial system to support a truly sustainable economy. The system whereby the money supply depends exclusively on debt finance by banks DOES NOT WORK - the crash proves it. The debt based financial system can easily be reformed by direct distribution of money to citizens (by the State or by the ECB) without being washed through the banks in variations of quantitative easing. A job programme can be part of it and a citizen's income of natural commons dividends too depending on your political goals and perspective. This reform can come at EU/ECB level or/and at national level or/and at local level - but easiest at ECB level. It would solve the debt problem and free us from artificial constraints that benefit a very small elite in the financial, insurance and real estate sectors.

The Environmental Pillar believes a formal consultation on ideas and reform of fiscal instruments and the management of "the commons" is required as a matter of urgency with a view to informing necessary reforms. The draft FSDI in Measure 2 proposes a "gradual shift". What is required is an informed structured assessment of what is highly problematic from a sustainability point of view for example in terms of taxes and a concerted focus on migrating from that as a priority. The shift in brief needs to be objectively informed by the imperatives for change – not political sensitivities. If a building is on fire – you manage the evacuation rather than addressing the social niceties of issuing gilt-edged invitations to leave the building. Government has a responsibility to the current and future generations to grasp the nettle, and to bring people along with it, even if the medicine is unpalatable. This is where education, communication and a removal of guardianship of "the commons" to Trusts away from political spheres may assist in the practical reforms necessary. The establishment of trusts to act as guardians for the sustainable management of 'the commons' for air, freshwater, marine

resources, etc. would also facilitate removing from the political sphere the challenge of charging for excessive use or of pollution. The emphasis is not on trying to price the intangible value of nature or natural services, but on pricing to protect sustainability of these commons, provide fair use and fair free allocations, and cover the management framework necessary.

Site Value Tax (SVT) is the first move to a recovering commons wealth and ending the free lunch for landowners and speculators. It eliminates the chief device that the financial sector uses to create 'debt based money' - lending against existing land assets that go up in price as a result to allow more lending etc. A SVT and a Land value tax is not a 'wealth' tax: it is a rental charge for the locational/land commons. It is important to acknowledge that money has to be seen as a commons too (a social commons) which has been privatised or 'enclosed' by the financial sector

The Environmental Pillar does not support the retention of wealth by individuals and companies when it is created by 'robbing' and compromising 'the commons' which include those elements and services fundamental to the sustainability of life and quality of life for current and future generations.

Finally it is submitted that tools like SVT and LVT have to be a major part of a FSDI. So too must a Cap and Share (or tax and share) system for carbon , and at the very least formal consultation on such approaches must be initiated as part of defining overall fiscal and economic reforms to fix and replace our not fit for purpose economic and fiscal solutions.

5.1.1. The Failure of the NSDS 1997 to tame the Celtic Tiger

The 1992 Earth Summit committed the signatories to the declaration to implement a comprehensive programme of actions towards achieving more sustainable patterns of development during the 21st Century and beyond. Ireland's first attempt at articulating such a programme was published in the 1997 document – 'Sustainable Development – A Strategy for Ireland'. Looking back at it now fifteen years after its publication this was a remarkably visionary document for its day containing simple concise language and clear objectives. Unfortunately, like so much of Ireland's policy implementation, it was routinely ignored in the ensuing chaos of the 'Celtic Tiger' bubble. One simple objective of the original strategy stands out as having had the potential to significantly mitigate the resulting economic crisis and Ireland's generally dismal environmental record – '*No State funding will be provided for infrastructure in the event of over-zoning*'(pg 13). In the subsequent years Councils across the country embarked with impunity on a zoning frenzy with more than 44,000 hectares of land zoned for housing alone – at least 32,000 hectares more than was actually needed – without any sanction from Government.

- ❖ **The challenge to change rhetoric and paper commitments into effective action and enforcement of policy is the challenge the FSDI has to articulate and the Government has to deliver on.**

The measures from the draft FSDI are taken as a starting point with additional proposed text highlighted, and modifications indicated by double strikethroughs. Additional Measures are included in green bold text.

Comments on specific Measures Proposed:

Modify:

1. Integrate environmental and social indicators into measures of economic progress
The Government will take account of the environmental and social impact of economic activity and, building on the work of the Central Statistics Office (CSO), develop in consultation with the public, measures of wellbeing to supplement include relevant economic indicators, the status of environmental resources and be used as a metric for prosperity-our sustainable status.

Additional Measures Proposed:

Add:

1b.

For traditional measures such as GDP and GNP, the Government will develop adjustment factors to inform and provide context for the sustainability of the levels of growth indicated by GDP & GNP

Add:

1c.

For traditional measures such as GDP and GNP, the Government will develop adjustment factors to inform and provide context for factors currently included in GDP & GNP such as number of patients treated and number of people in prison – which are infact not considerations which reflect the wellbeing of society.

Add:

1d. Timeframes for development and implementation of revised reporting measures

The revised measures referred to in 1, 1a & 1b are to be developed in 2012, and implemented from Q1 2013, with refined and improved collation of the underlying data facilitated and reported on; and accompanied by media briefing, and a public communications campaign so the significance of the measures is understood. Reporting on the measures and improvements in the collation of same will be made by the Taoiseach quarterly in the Dáil, in conjunction with commentary from the renamed NSDC – formerly NESC.

Modify:

2. Develop a framework for environmental tax reform

A gradual shift of the tax base away from taxing what we want more of, such as investment and labour, towards taxing what we want less of, such as pollution, would help contribute to the Government's objective of creating a resource efficient and smart green economy. The Carbon Tax already in place is an example of the effective use of environmental taxes for revenue raising purposes. A tax base that derives a greater proportion of revenues from unsustainable consumption behaviour and goods and less from labour will also provide a wider and expanding tax-base than present, thereby contributing to the response needed to offset the fiscal implications of a declining workforce and an ageing society. The environmental tax reform framework will also need to take into account issues of equity and competitiveness and the ability of those bearing the tax to pay.

Add:

2b. Implement a prioritised programme of tax reforms to facilitate sustainable resource management and consumption.

Initiate formal consultation on tax reform in 2012. Implement a consequential programme of prioritised tax reforms to facilitate sustainable consumption and production behaviours commencing in Q2 2013, based on an impact and needs analysis of the reforms required to address dysfunctional taxes and unsustainable consumption and production behaviours.

Comment/Modify/Add:

3. User Charges

Together with the introduction of domestic water charges for excess water usage as outlined in Measure 31, 18, the Government will consider more widespread use of excess user charging. There is now a considerable body of academic work and international examples underpinning the introduction of these instruments, and this will assist in choosing the best instruments for achieving the objectives. *Note: Measure 31 is referred to as being about water charges – it is not. The following is added to the above:* As water is a fundamental right and human need basic free allowances and measures to protect the disadvantaged have to be implemented in line with the UN guidelines on daily water allowances and implemented further to public consultation. Measures to introduce excess water usage charging have to be accompanied by programmes to deliver on reduction of useage, wastage and loss which should be funded as a priority, and similarly with other commons where charging is proposed.

Add:

3b. Implement reforms to effect the sustainable management of “the commons”.

Initiate formal consultation on sustainable management of “the commons” in 2012. Develop and implement consequential organisational and structural reforms in 2013, recognising that different resources may require different solutions and different timetables to migrate to new solutions. Develop and collate associated baseline information to facilitate annual monitoring of the impact of the new structures/reforms effect on the sustainable management of “the commons”

Modify:

4. Shifting the fiscal focus towards the Green Economy

~~Over the longer term and~~ Further to consultation in 2012 on sustainable fiscal initiatives and in line with the recommendations of the OECD¹⁰, consideration will be given, priority will be afforded in the context of advancing the green economy agenda the sustainable development of the bluegreen agenda in Ireland, to the development and implementation of appropriate fiscal measures and the gradual speedy elimination of subsidies and perverse incentives that have negative impacts on the environment and are incompatible with sustainable development and that create economic distortions and social inequity. The prioritisation and introduction of such measures will be informed by the timetable needed to reverse unsustainable patterns and behaviours and to reverse environmental deficits. It needs to be recognised that this measure may require measures that will add to costs e.g. For the disposal of waste.

5. National Reform Programmes under EU 2020

National Reform Programmes implementing Ireland’s commitments under the *Europe*

2020 Strategy will take account of the measures in this Framework for Sustainable Development for Ireland. These synergies will also be important in other policy making areas, including those relating to local government.

Add:

5a: Hierarchy of plans and policies defined in a legislative context:

A Hierarchy of Plans and Policies will be defined in a legislative context by Q1 2013, which places the Framework for Sustainable Development at the heart of decision making – informing and directing all other plans and policies and Departmental strategies.

5.2. Re Draft FSDI Section 2.2: Sustainable Consumption & Production

It is simply not enough to address production – in the context of the finite and depleted natural resources available and the ongoing increase in human population, consumption patterns and behaviours need to change. A whole range of complementary initiatives and underlying data and quality assessment mechanisms and criteria need to be developed and implemented to ensure that people have the correct information to inform their choices on what is truly sustainable. Government need to provide this underlying structure, require it of business and suppliers, and lead by example in relation to insisting on compliance with it and in using it to determine its own procurements and operating practices.

6. Completion of Policy on Waste Management

A new Waste Management Policy will be finalised by the start of 2012, adhering to the waste hierarchy and moving Ireland away from an overdependence on landfill, where a range of alternative treatments will have a role to play.

Note: With reference to measure 3. The waste hierarchy has to be respected completely and the full cost of all disposal methods, including externalities calculated and taxed accordingly by 2013.

Priority will be given to implementation of waste minimisation initiatives.

Incentives will be provided for the establishment of local reuse of recycled materials into useful products and to reduce the impact of transportation and effective destruction of key oil based resources such as plastics in 2013.

Production of products which cannot be easily reused or recycled will be phased out and imports of them restricted.

Levies will be applied to products in accordance with their reusability and recyclability in order to incentivise producers to use appropriate materials.

7. Resource Efficiency

In line with the development of the EU *Roadmap to a Resource Efficient Europe* under *EU2020*, the Government will work to ensure the effective implementation of this initiative in Ireland.

Modify

8. Green Tenders, An Action Plan on Green Public Procurement

The forthcoming Action Plan on Green Public Procurement, *Green Tenders*, will act as a driver in developing the green economy in Ireland. Full transparency and consideration for the actual sustainability of products and services and the ethical implications of their sourcing and production will inform the BlueGreen Procurement Plan for Public Bodies and associated policies, and in turn private consumption and production choices.

The data and decision making processes associated with green procurement will be immediately available to the public. Additional complementary requirements will be delivered:

Procurement policies incorporating fiscal and other mechanisms will be developed to reflect the real value of ecosystems and biodiversity.

Procurement policy and practice will employ ecosystem valuation methodologies such as those promoted by the TEEB study.

National resource will be measured and quantifiable targets developed with regard to improving natural resource efficiency.

The government will bring green buildings operation into all its buildings and favour reuse over new build. One way of doing this would be to incentivise all Departments to upgrade their existing stock to reduce energy consumption.

Bluegreen criteria used by Government will be quantifiable, transparent and not vague.

Government will utilise and support the development of decision-support tools such as Life Cycle Analysis, Certification schemes and Eco labels.

Add:

8a. Green Procurement and Consumption in the private sector.

To realise the positive effects required in terms of sustainability the following underlying structure of complementary initiatives will be delivered:

- i) Ecosystem valuation methodologies such as those promoted by the TEEB study will be developed to provide the necessary backdrop of information required to inform sustainable production processes and consumption behaviours and the necessary fiscal measures to drive same.**
- j) National resource will be measured and quantifiable targets developed with regard to improving natural resource efficiency.**
- k) 'Green' and 'sustainable' labels and criteria will be quantifiable, transparent, and not vague**
- l) Utilisation (and support the development of) decision-support tools such as Life Cycle Analysis, Certification schemes and Eco-labels**

9. Resource Efficiency Programmes for Business

The relevant agencies (e.g. IDA, EI, SEAI, and EPA) should continue to work to offer an integrated suite of resource efficiency programmes for business. Leverage of Academic University and third-level student expertise and post-graduate involvement will be specifically incentivised and encouraged through the support and development of "Science Shops". The remit of County Development Boards will be redefined formally as County/City Sustainable Development Boards. These SDBs will collate and publicise improvements in resource usage in the own Local Authority operations together with those of the businesses and homes within their jurisdiction from 2013 onwards.

Add:

9a. Resource Management:

Ireland's goal will be to create a waste free society whereby no material is deemed as useless. A plan and policy for the phasing out the residual waste stream (reference achievements in Nova Scotia, Canberra Australia etc) will be developed and rolled out as a priority by 2014. In harmony with current EU and National Policy, investment in waste infrastructure should aim at supporting the highest priority - waste prevention and minimisation measures, followed by waste separation for reuse and recycling.

9b. Legislate for responsible consumption and resource management

Legislation and associated policy will be introduced to ensure collation of the necessary information on consumption and resource usage and to define quantifiable targets to improve resource efficiency and more sustainable consumption patterns.

Add:

9c. Measurements to inform our understanding of resource use:

National resource use will be measured and quantifiable targets developed with regard to improving natural resource efficiency.

Add:

9d: Pricing mechanisms to facilitate sustainable resource management

Resource prices need to reflect resource value in terms of the cost of sustaining and protecting the resources and reflecting ecosystem services, and the cost of pollution. Formal consultation building on TEEB model will be initiated in 2013 with a view to implementing proposals in 2014.

Add:

9d: Incentivise resource efficiency:

Ireland will develop a scheme which gives industry a real incentive to reduce and reuse, through the introduction of taxes on packaging of goods which can be sold loose, legislative and fiscal measures to deal with harmful waste products and inefficient resource usage¹⁷; introduction of disposal of packaging at point of sale; certified and clearly labelled; levies on goods based on ease of reuse/recyclability incentives for industry which reuse and recycle products consumed in Ireland.

¹⁷

Toronto City Council placed a ban on the sale of plastic water bottles within all municipal premises by 2011. In conjunction with this drinking fountains were upgraded to ensure access to clean and safe drinking water. When banning a product it is essential to evaluate the life cycle implications of the alternative proposed.

For example

5.3. Re Draft FSDI Section 2.3: Conservation and Management of Natural Resources

As in the other sectoral sections above - the over-arching comments in Section 3 of our response should be taken as a given – particularly in response to the Conservation & Management of Natural Resources.

Key challenges for the framework here include existing deficits which have to be reversed, issues with quality and availability of underlying baseline data, policy conflict resolution.

The Environmental Pillar welcomes the recognition within the draft FSDI that there are currently information and evidence base knowledge gaps, which make policy development and measurement of environmental outcomes very difficult. This is the necessary challenge the Framework has to address therefore – as such information is critical to inform our understanding of what is and is not sustainable, not just from Ireland's economic perspective but also critically from an ethical and moral motivation and imperative.

Even in the context of the habitats and species Ireland is most bound to protect under the Habitats and Birds Directives – the latest reports provided pursuant to the requirements of Article 17 of the Habitats Directive show that many of our most important habitats and species are in poor conservation status and indeed availability of data for certain species and habitats is in itself an issue further compromising a truly accurate view of the current conservation status.

Fundamentally if Ireland is to deliver on its biodiversity targets – it needs to 'put its money where its mouth is'. The cuts to the agencies and bodies and initiatives which address conservation and protection of our biodiversity were disproportionate with those executed in other sectors. The 2011 budget cuts to the NPWS of 57% and to the Heritage Council of 47% were far in excess of those to other areas such as Tourism, Arts and Sport. These need to be reversed. Ireland has an international obligation in relation to our Natura 2000 network, and yet the conservation status of our sites and indeed protected species and habitats outside the network is poor. Reversal of these trends of biodiversity loss will not happen without the appropriate investment. To those less sympathetic to the moral imperatives, there is a strong economic imperative to protect the ecosystem services necessary to provide for effective nitrogen cycles, pollination services, sustainable fuel and climate change services from effective hedgerow management together with other revenue streams such as ecotourism. These are areas the Environmental Pillar would be happy to further substantiate if Government has difficulty justifying the allocation of resources.

Ireland faces significant fines and has a disturbing record on non-compliance in relation to EU Environmental legislation. A concerted focus is needed to redress this and the impact of same of Irelands biodiversity and habitats.

The issues paper produced to inform the development of a National Landscape Strategy is considered to have failed to identify and characterise the pressures on landscape in Ireland. Techniques such as Landscape Character Assessment which are being positioned as fundamental to the strategy and rolled out across Local Authorities – are fundamentally skewed toward facilitating development and evaluating a landscapes capacity to absorb a development without reference to wider issues of sustainability and other planning guidelines. Additionally there is a complete opposition to any concept of protecting or conserving the landscape for its intrinsic value or biodiversity implications – the whole approach is focused on accommodating human development requirements. Given the fundamental importance of landscape and the management of same for the provision of habitats and ecosystem services – the direction being taken with the landscape strategy is of serious concern and is indicative

of the need to ensure all such strategies are informed by the fundamental principles and requirements to address sustainability as the critical driving objective.

Additionally the Environmental Pillar would like to highlight deficiencies and concerns in relation to the treatment of Marine, Aquaculture and Fisheries not only within the draft FSDI but in wider policy and plan initiatives. The measures associated with Marine are included in this section in the draft FSDI but may in fact warrant a separate section.

The Environmental Pillar would have specific concerns in relation to Aquaculture and Marine the emphasis of the new policy initiative "Our Oceans Wealth"¹⁸ which seems to approach the management of our seas as a logistics exercise to see how much and how many development initiatives can be squeezed in be they resource exploitation or energy generation initiatives or aquaculture farms; rather than a responsible and sustainable approach to the husbandry and stewardship of marine resources.

Further focus is also considered essential in relation to the development and implementation of a sustainable fisheries policy. There is a critical need to specify and act upon a sustainable fisheries policy in Ireland for Ireland, rather than await and defer to the Common Fisheries Policy and the Marine Strategy Framework Directive where lines of jurisdiction and boundaries result in confusion and lack of effective implementation. The fundamental issues with transparent data collation, transparency of data and data sharing have to be addressed in order to provide a clear view of what is happening in Irish waters, and to help explain and understand significant issues such as while 30 year cod recovery programmes would predict cod levels of X – there is an unexplained four-fold mortality/decline in Cod.

The Environmental Pillar welcomes the reforms of the Central Fisheries Policy, and wishes to encourage Ireland to actively engage with Europe to further strengthen this particularly in relation to aquaculture and through greater clarity on boundaries in particular as they extend toward inshore fishing areas.

The issue of fish discard has attracted major publicity in recent months – and a concerted effort has to be to resolve the issues of discard where fish are caught but discarded overboard as it is illegal made to land them; and to mitigate against by-kill where fish are so damaged or compromised by the fishing techniques employed they die, and where it is virtually impossible to account for this mortality rate. Too often the negative impact of 'by-kill' most effect younger fish thus compromising the future generations of fish and marine creatures. In conjunction with seeking technical resolutions to these issues it has to be recognised that between all the differing net solutions there simply is as yet no satisfactory technical solution. Therefore in the interim of an acceptable and viable technical solution a precautionary and responsible approach must be employed to provide for Marine Protected areas, where types of methier/gear should be controlled. This is not necessarily asking for closed areas, but for more strictly controlled practices in sanctuaries, and for the completion of sea areas proposed for designation by the NPWS under the Habitats Directive Natura 2000 network provisions, where the conservation measures necessary to deliver on the conservation objectives for the designated species of these sites will effect a cascade of positive ecosystem impacts.

Additionally perverse subsidies need to be eliminated which while intended to reduce the fleet and its capacity by providing subsidies for the elimination of old boats – merely encourage the elimination of smaller more sustainable fishing operations and the upgrade of boats which can fish at 3 times the level of the smaller eliminated boats. Further perverse subsidies include the lack of tax on diesel for

18. <http://www.ouroceanwealth.ie/Briefing%20Documents/Our%20Ocean%20Wealth%20Briefing%20Documents%20for%20Consultation%20Part%20I%20context.pdf>
[Accessed 20/02/2012]

boats which encourages the use of larger vessels which have the capacity to fish at unsustainable levels.

In relation to aquaculture there is a significant emphasis on salmonids and development of salmon farming. The underlining definition of organic and sustainable are of concern for this sector, as the granularity of data is not currently available to determine that the food sources for the salmon are in turn arising from sustainable fishery activity. The location of salmon farms also needs to be considered in the wider context of our biodiversity and the issues arising from sea lice and the compromise of our genetically unique wild salmon. Formal consultation on the development of the salmon industry and a range of consequential considerations including land based solutions for salmon farms utilising quarries etc should be initiated with a view to informing a plan and policy to manage the positive and negative impacts of such proposals.

Additionally, there has been a singular failure to address the long term sustainability issues arising from the introduction of non-native shell fish in farming; and a failure to address a programme to mitigate against contamination and infestations of harmful water based invasive species even through recreational activities in the water. These are critical matters for a framework for sustainable development and they simply have not been addressed.

Measure need to be taken to recognise and leverage the extensive knowledge and expertise on sustainable fishing practices which many of our small fishers have – for example native oyster fishermen.

Finally the threats posed by invasive species to Ireland's biodiversity needs to be prioritised in terms of data collection and a concerted and informed management response.

5.3.1. Measures proposed in draft FSDI with amendments:

10. Implementation of Actions for Biodiversity 2011 – 2016: Ireland's National Biodiversity Plan

The Government will implement Actions for Biodiversity 2011-2016: Ireland's National

Biodiversity Plan which will co-ordinate actions aimed at progress towards meeting national, EU and Global 2020 biodiversity targets. The Government will also support the integration of biodiversity concerns with climate change, economic and spatial planning policy. This will be taken forward through the governance arrangements outlined in section 3. **Delivery on these targets will be prioritised over other conflicting targets and policies.**

11. Development of a National Habitat Map

A National Habitat Map will be developed by 2016. This will be an important tool underpinning decisions on policies and action to protect biodiversity and a stepping stone to future, long-term measures, such as the development of ecosystem services mapping and a national ecosystem assessment. **This has to be conducted in conjunction with the review of the Natura 2000 sites and the requirement under the habitats directive to list more sites for the species that remain under threat, and will include marine habitats and species in addition to those which are land based.**

12. Development of an integrated approach to Green Infrastructure

The Government will ~~continue to~~ develop **and implement** an integrated approach to Green Infrastructure planning to improve the quality of our natural environment and support biodiversity at the national, regional and local level. This will be carried out in partnership with key stakeholders and will include raising awareness of the associated benefits **both fiscal and intangible.**

13. Effectively communicating the economic rationale for conservation of natural resources

The Government will develop and communicate the economic rationale for investment in protection and enhancement of natural capital, including the economic rationale. This will strengthen the mainstreaming of biodiversity considerations across policy areas.

14. Development of Indicators and Accounting Systems (satellite accounts) for natural capital

The Government will develop and strengthen indicators and accounting systems for natural capital building on the environmental and material flow accounts produced by the Central Statistics Office.

15. Development of a National Landscape Strategy

A National Landscape Strategy, which has a major role in mapping out the path to sustainable management of our built and natural resources, is to be adopted. This will require alterations (variations) to all completed County Development plans as well as national spatial plans and regional development plans. The provision of public access to lands (thus creating a valuable green tourism asset) should be a part of this. The Landscape Strategy will be informed by the fundamental principles of sustainable development as the over-arching principle for landscape management, and recognise Ireland's priority and commitment to halting biodiversity loss and redressing the deficits incurred in our ecosystems.

16. Development of an Integrated Approach to Marine and Coastal Planning

The Government will develop an integrated marine and coastal planning process in order to maximise the potential for Ireland's coastline in sustainable fishing, sustainable aquaculture, sustainable ocean energy and sustainable tourism.

A major part of this is to develop a series of research controls so we have a baseline against which we can judge the effectiveness of the protection and the limits of exploitation. To do this we need to maintain a number of areas without any development.

17. Implementation of the EU Marine Strategy Framework Directive

The Government will implement measures under the Marine Strategy Framework Directive to protect and preserve Ireland's marine environment including the completion of an initial assessment of marine waters in 2012.

17a Designation of Marine Areas under the Habitats Directive

The Government will complete the designation of marine protection areas proposed by the NPWS under the Habitats Directive.

17b. Introduction of protection areas to mitigate against the effect of discard and by-kill

Areas will be identified and protections introduced and enforced where the métier and gear permitted will be strictly controlled to mitigate against the effects of by-kill and by-catch until a satisfactory technical solution is proven to avoid these negative consequences.

17c. Sustainable Fisheries policy

Ireland will develop a sustainable fisheries policy and marine protection strategy with clarity on the boundaries and jurisdictions pertaining to overcome the ongoing uncertainties arising from the CFP and MSFD.

17d. Marine Fisheries Baseline Data and Monitoring

Ireland will establish an effective, transparent and open data collection mechanism to establish and monitor the status of our marine fisheries by 2013?

18. Introduction of Domestic Water Charges

The Government will introduce **excess water usage charge domestic water charges** following a programme of water metering (see also Measure 3). This programme will provide for free allocations based on UN calculations for reasonable consumption requirements; and will include support for those less able to pay. It will be accompanied by initiatives to deliver on more efficient management and use of water to include education, efficiency measures, together with initiatives to address correction of failed and leaking systems etc.

Add:

18a Flood Risk Management and Soft Engineering Opportunities

Future strategies for Flood Risk Management will consider as a priority the research on the services provided by wetlands in flood attenuation; and prioritise the incorporation of wetland creation, protection and management into flood risk management plans.

18b National Hedgerow Conservation Plan.

A national hedgerow conservation plan will be developed.

18c. Wider Countryside Measures:

Mechanisms will be implemented to effect and enforce protection of the wider countryside, recognising the importance of natural buffer zones, and the services provided in terms of pollination, flood alleviation etc.

18d. Giving effect to the biodiversity consequences of the action plan on BlueGreen Public Procurement.

There will be prioritisation of the measures within the action plan for BlueGreen Public Procurement which are consistent with positive biodiversity outcomes – for example there will be prioritisation of measures to stop and penalise the import and purchase of illegally felled timber.

18e. Designation of Ireland's Natura 2000 network sites

Ireland will complete the designation and protection of its Natura 2000 network sites by June 2013 including the specification of the additional sites necessary to address outstanding habitat and species provisions, and marine sites.

18f. Site specific conservation objectives and management plans for all Natura 2000 network sites.

Define actual site specific conservation objectives based on the available national and site baseline data by end of 2012. Ensure improved collation of baseline data at site and national levels, and revise site specific conservation objectives annually consequentially. Develop site specific Management Plans and reporting mechanisms by June 2013.

18g. Natural Heritage Areas and proposed Natural Heritage Areas.

Proceed with the final designation of pNHAs commencing with those which do not require further surveys as identified in An Taisce's report "NHAs - The Case for Conservation".¹⁹ Provide and implement detailed action plans to ensure legal protection of Ireland's Natural Heritage Areas and those proposed for designation – in a manner consistent with the protection afforded proposed sites under the Habitats Directive to avoid deterioration prior to designation. Identify buffer requirements to facilitate protection of the pNHAs and NHAs.

¹⁹ <http://www.antisce.ie/LinkClick.aspx?fileticket=a0roZSvXhaM%3D&tabid=633&language=en-US> [Accessed 20/02/2012]

18h. Support for effective implementation of environmental protections

Primary legislation will be used to ensure the effective transposition of EU environmental protection directives. All decision-making powers in relation to Environmental Impact Assessment and Strategic Environmental Assessment will be given to independent bodies. Binding statutory guidelines will be produced for local authorities and other decision making bodies on the protections afforded under the Habitats and Birds Directives for Natura 2000 sites and the strict protection of Annexed species pursuant to Art 12 of the Habitats Directive and specified bird species pursuant to the Birds and Habitats Directives. There will be a requirement for Continuous Professional Development Training in relation to same, and courses will be developed and provided. Decision making bodies will be penalised by Government for non-compliance with the protections in decisions which they make. This is in order to ensure compliance with the directives, avoid fines from Europe for non-compliance and facilitate achievement and or maintenance of 'favourable conservation status' for protected species and habitats.

18g. Pan-European Whale and Dolphin Sanctuary

In 1991, Ireland's waters were declared a Whale and Dolphin Sanctuary in recognition of the importance of Irish waters for these protected species. This statutory declaration was unique in Europe at the time and no other European member state had made such a significant gesture in respect of cetaceans. Since its declaration this action has helped raise awareness and interest in cetaceans, and led to increased research and knowledge, which has yielded more effective conservation actions and environmental benefits, and indeed a added dimension to our eco-tourism portfolio. As part of the 21st anniversary celebrations to commemorate this landmark initiative, in 2012 Ireland will call on its fellow EU members to make unequivocal statements in relation to cetacean protection and to create a pan-European Whale and Dolphin sanctuary, facilitating not only a protection measure but the tabling on the political agenda of additional conservation measures and highlighting the threats to these species.

5.4. Re Draft FSDI Section 2.4: Climate Change and Clean Energy

Climate change is the defining challenge of our age. Yet Ireland has no legislation to underline its commitment to addressing it.

A robust climate bill is an essential mechanism to drive the necessary changes required to address this challenge.

Because of legacy issues with poor insulation and the quality of our national housing stock, the higher levels of energy consumed by one-off houses or free standing houses and the limited capacity to retrofit district housing scheme – Ireland faces particular challenges in reducing the level of greenhouse gas emissions in the domestic heating sector.

Ireland has adopted a 40% renewable power generation target for 2020. This will require significant investment and development work, and significant development in large scale wind turbine and grid connection development is proposed. A strategic approach to grid enforcement and wind energy distribution which recognises Ireland's priority commitment to halting biodiversity loss, its obligations in terms of peatland protection and sensitive landscapes is required as a priority.

It is a challenge and DoECLG and Local Authority policy has proved ineffective in managing this challenge. Planning conflicts have resulted, local authority decisions are being overturned based on conflicts with their own development plans and impacts on nationally sensitive landscapes.

Apparent conflicts between Agricultural Harvest 2020 targets and emission reduction targets remain unresolved within the draft FSDI.

The NESC secretariat study clearly needs extra resources and expertise if it is to deliver on the study proposed in Measure 19.

To have an 80% reasonable chance of avoiding the 2°C rise in global temperatures now agreed at UNFCCC to constitute 'Dangerous Climate Change', concentrations of carbon dioxide would need to stabilise in the long-term at around the current level of approximately 400ppm. Concentrations of the other greenhouse gases (methane, nitrous oxide) would also have to be stabilised. Should concentrations continue to increase to 550ppm a 15% chance of exceeding the much higher temperature, and potentially catastrophic, value of 4.5°C would exist.

In order to stabilise concentrations at about 450 ppm over the next 40 years, global emissions would have to decline by about 60% by 2050. Industrialised countries greenhouse gas emissions would have to decline by about 80% by 2050. For Ireland this means a 2% per year reduction per year from the present for the next 40 years. Existing policies are not going to deliver this.

The proposals for sectoral mitigation progress to be pursued through the Cabinet Committee on Climate Change and the Green Economy are inadequate and will be ineffectual. Inter-Departmental interests will subsume the energies of this body and political short termism will blunt its progress. The following is essential for effective mitigation:

- A strong legislative underpinning of mitigation targets such as has occurred in the UK Climate Law and is being applied in its devolved administrations such as Scotland.
- A science based target in law for 2050, for the reduction of domestic emissions without offsetting. The EU has adopted the IPPC analysis that developed countries will have to reduce emissions by 80-95% by 2050. The all-party Oireachtas Committee Bill produced in the last Dáil had an 80% reduction target.
- The law must provide for the adoption of 3-5 year legally-binding carbon budgets, as is the case in the UK and Scottish laws. A carbon budget is simply the totally allowable emissions in a given period. Ireland's 5-year carbon budget during the current phase of Kyoto is 314mt of CO2 equivalent.
- An independent Climate Change Commission, with the power to publish its own reports, to advise the Taoiseach, the appropriate line Minister, the Oireachtas and the public, on targets, carbon budgets and measures and report annually on progress made in mitigating emissions and achieving adaptation goals.
- Responsibility for achieving national targets must be given to the Department of the Taoiseach's Office. Only if the Taoiseach is responsible for arbitrating between rival departments can progress be expected.
- Strategic Environmental Assessment of Plans, Programmes and Policies is currently required under EU Directives. This should explicitly be required to contain a 'carbon commitment' estimate and justification of how such a commitment assists the achievement of national targets.

In relation to Proposed Measure No. 20. National Climate Change Adaptation Framework and National Adaptive Capacity Assessment below – namely:

"The Government will publish a National Climate Change Adaptation Framework and a National Adaptive Capacity Assessment, which will identify the strengths and weaknesses

in Ireland's ability to adapt to climate change and highlight areas where early action might be undertaken."

- it is considered that much of the groundwork for a National Adaptive Capacity Assessment still requires to be done. Only a scoping study of vulnerability has thus far been commenced by the EPA and no climate change risk assessment, such as has occurred in Northern Ireland, has yet been initiated in the Republic of Ireland. A meaningful Adaptive Capacity Assessment cannot be determined in the absence of such work.

Considerable adaptation work has been carried out in the water, building, governance and biodiversity sectors, with other research also completed in Tourism and Planning. These require to be further progressed to activate adaptation policies. In particular the following aspects require attention to ensure sustainable development strategies are achieved in the adaptation area:

- Identification of critical infrastructure
- Identification of population exposure levels to climate hazards such as flooding, landslides, drought and wind storm
- Integration of biodiversity concerns into adaptation policies. As a non-economic variable, ecosystem goods and services require to be quantitatively incorporated into adaptation strategy
- Communication of uncertainty and the importance of a 'no regrets' approach to climate change adaptation as part of a concerted outreach plan for public awareness.

Adaptation ultimately requires a rethink on governance and the role of local authorities in implementing national policy in this area. Without adequate resourcing and direction from central government many adaptation policies will not be implemented on the ground.

Peak Oil

The FSDI mentions Peak Oil as a challenge, we would submit that Peak Oil is a major challenge facing Ireland and that it should be considered on its own and not just under a few measures under Climate Change and Energy.

Peak Oil will have severe repercussions not just in Transport and Home Heating but across all aspects including Agriculture, Water, Waste and Sewage Treatment.

Recommendations re Measures Proposed:

~~19. Review of National Climate Policy~~

~~The outcome of the Review will underpin the development of future climate policy in support of achieving existing and national greenhouse gas mitigation targets for the period to 2020. It involves a three-pronged approach:~~

- ~~• an independent study to be carried out by the Secretariat of the National, Economic and Social Council (NESC);~~
- ~~• a public stakeholder consultation to be undertaken in 2012, and (including the environment sector)~~
- ~~• sectoral mitigation progress to be pursued through the Cabinet Committee on Climate Change and the Green Economy.~~

Replace with:

19. Implementation of Climate Legislation and establishment of Independent Expert Advisory Panel

A strong legislative basis to deliver on climate change obligations will be introduced and implemented; including underpinning of mitigation targets such as has occurred in UK Climate Law and is being applied in its devolved administrations such as Scotland. The law will have sectoral targets which are binding on an annual basis.

An independent Climate Change Commission to advise the Minister for the Environment, Community and Local Government on emissions targets and to report to the Taoiseach annually on progress made in mitigating emissions and achieving adaptation goals will be established by Q2 2012.

Responsibility for achieving national targets will be given to the Department of the Taoiseach's Office. Only if the Taoiseach is responsible for arbitrating between rival departments can progress be expected.

Strategic Environmental Assessment of Plans, Programmes and Policies is currently required under EU Directives. This will be explicitly required to contain a 'carbon commitment' estimate and justification of how such a commitment assists the achievement of national targets.

Insert a new 19a

19a. Undertake a Risk Management Strategy for Peak Oil

Replace 22 with:

22. The Government is committed in the Programme for Government to the introduction of climate change legislation.

The Minister for the Environment has published a Roadmap which commits to the publication of Heads of Bill approved by Cabinet in the fourth quarter of 2012.

The Oireachtas environment committee will consider the Heads of Bill in the first part of 2013 and, taking into account the report from the Committee, the Government introduce a full Bill to the Oireachtas in the fourth quarter of 2013.

Modify:

20. National Climate Change Adaptation Framework and National Adaptive Capacity Assessment

A climate change risk assessment, such as has occurred in Northern Ireland, will be initiated in the Republic of Ireland. A meaningful Adaptive Capacity Assessment cannot be determined in the absence of such work.

Considerable adaptation work has been carried out in the water, building, governance and biodiversity sectors, with other research also completed in Tourism and Planning. These require to be further progressed to activate adaptation policies. In particular the following aspects require attention to ensure that sustainable development strategies are achieved in the adaptation area and will be prioritised:

- Identification of critical infrastructure
- Identification of population exposure levels to climate hazards such as flooding, landslides, drought and wind storm
- Integration of biodiversity concerns into adaptation policies. As a non-economic variable, ecosystem goods and services require to be quantitatively incorporated into adaptation strategy
- Communication of uncertainty and the importance of a 'no regrets' approach to climate change adaptation as part of a concerted outreach plan for public awareness.

Adaptation ultimately requires a rethink on governance and the role of local authorities in implementing national policy in this area. Adequate resourcing and direction from central government will be provided to ensure adaptation policies will be implemented on the ground.

Following the above necessary preparatory input steps the Government will publish a National Climate Change Adaptation Framework and a National Adaptive Capacity Assessment, which will identify the strengths and weaknesses in Ireland's ability to adapt to climate change and highlight areas where early action might be undertaken. This will be done in conjunction with a review of European sites and the further designation of sites for species at risk to address the impact on the Natura 2000 network obligations.

Modify:

21. Ensure that critical infrastructure is climate resilient

As infrastructure plays a key role in the effective functioning of a society and economy and has long life-spans, efforts should be made in the context of sectoral adaptation measures to ensure that such critical infrastructure, whether in public or private ownership, is climate resilient, but such resilience needs to be designed in a sustainable and ecologically appropriate way, and should seek to leverage the possibilities afforded by soft engineering solutions such as wetland development for flood management.

Modify

22. Publish appropriate legislative instruments

~~Appropriate legislative instruments will be published to underpin progressive national policy positions on mitigation and adaptation in the context for the transition to a low carbon, climate resilient future.~~

A robust Climate bill will be introduced in 2012 and passed into law in Q1 2013, accompanied by a suite of policy solutions on mitigation and adaptation to address biodiversity and lower carbon and lower emissions targets.

23. Emissions Trading

Ireland will continue to play an active role in the EU Emissions Trading Regime for greenhouse gas emissions.

Modify:

24. Review of Irish Energy Policy

Ireland's energy policy is subject to peer review by the International Energy Agency in 2011. The lessons learned from this review process with regard to sustainable development will be identified and ~~given full consideration~~ implemented

Modify:

25. Implementation of National Energy Action Plans

Comprehensive National Energy Efficiency and Renewable Energy Action Plans and Affordable Energy Strategy are now in place. As part of the delivery of the Framework for Sustainable Development, the Government will maintain its commitment to the implementation of these plans with a view to achieving the targets which have been set, and without compromising Ireland's overriding commitment to halt biodiversity loss.

Modify

26. Develop a communication and research plan

There is a need to educate society about the implications of meeting the required greenhouse gas emissions reductions and the role all individuals have to play. A societal change will have to occur and people should be helped to understand the different impacts of their lifestyle choices. Ireland has already funded a public awareness campaign and so a Communication Plan will be developed that is focused on key stakeholders and outlines the scale of the change that must take place, costs of inaction and the benefits and opportunities of transition. This will be linked to the development of Resource Efficiency policies and strategies (including Sustainable Consumption and Production) and the encouragement of behavioural change (see measures 7 and 44). Communities will be facilitated in measuring and monitoring their emissions and reductions.

Add:

26a Domestic Energy Emissions:

Target national energy refit/insulation programme using Government bonds with householder loan scheme based on a pay as you save scheme and provide a scalable programme which does not exclude householders who have already undertaken insulation or energy efficiency measures. Support re-training of personnel to provide re-fit services.

Add:

26b: Phase out mechanised domestic peat extraction:

Phase out the use of domestic peat combustion from mechanised extraction of peat by 2020, with incentives for energy insulation, alternative biomass or other renewable sources as appropriate.

5.5. Re draft FSDI Section 2.5 Agriculture

Agriculture is an area which presents an incredible range of opportunities in relation to truly sustainable management of our environment and our economic recovery – and such matters have been alluded to in Section 3 of our response.

Agriculture is the heart of our rural economy, one of the largest employment sectors, the driving force of rural Ireland, arguably the only aspect of Irish society that has come through the crash with its international reputation intact, yet the draft FSDI only proposes two measures to support it.

In order to ensure we create a sustainable model for the on-going management of the Agri-sector, the framework should include measures based on the underlining principles for all development in Ireland in the future. Additionally the challenges arising from potentially conflicting targets such as production targets in Harvest 2020 such as the objective to increase beef and milk production by 50%. No assessment has been done on the impact of this target on climate emissions reduction obligations, biodiversity, fertilizer or energy use. This is the job of the framework, namely to provide clarity on the necessary priorities in terms of what is required to achieve sustainable development – and it fails to do so.

The draft FSDI fails to address the consideration of food security a critical consideration for the agricultural sector in particular. This vital aspect of sustainable agriculture needs to be discussed in the document and objectives set of how we are to achieve food security.

There are many agricultural models in other countries that have run successfully, putting the emphasis back on local produce and creating wealth within local economies. There is a need here to identify those opportunities and develop a strategy for nurturing them. This would create a web of sustainable local economies, that could be linked to a national framework, and provide a robust sustainable foundation for a new type of growth.

Measures Proposed in draft FSDI:

27. Continued support for sustainable agricultural development in Ireland

- The Government will actively pursue the implementation of environmental policies under *Food Harvest 2020* by: promoting sustainable pasture-based farming and soil management; contributing to sustainable energy requirements; contributing to the protection of biodiversity and ensuring environmentally sustainable production practices for seafood and aquaculture. **The impact of targets proposed under Harvest 2020 will be assessed and Ireland's ability to deliver on these targets while maintaining and delivering on other commitments in particular GHG emissions reductions across all sectors will be assessed and sectoral plans adjusted to ensure our international GHG commitments are not compromised.**
- The Government will ban the importation, use and sowing of all Genetically Modified Organisms and plants and products (in conjunction with the NI Government) to preserve our Island's GMO free image – this is a unique competitive advantage for Ireland within Europe. It is not sufficient to limit growth of GMO – as much of our dairy feed now contains GMO product which compromises the overall milk and associated agri-food industry image.
- A focus on and support for farmers to remain in farming and to increase productivity.
- A focus on maintaining the maximum number of active farmers in rural areas engaged in food production by ensuring that the necessary ingredients for the development and maintenance of sustainable communities are in place.
- The Government will identify measures to reduce food waste, including associated consumer awareness measures.

28. Research

The Government will identify research measures to ensure a focused approach in the agricultural sector nationally that:

- ensures environmental research relating to climate change and water quality is undertaken;
- includes public/private partnerships in carrying out required research;
- recognises the need for pure research and the requirement for state-funding for this. Ireland has a unique environment, climate and culture so it is necessary that Irish directed research is funded and undergone.
- ensures research bodies in food production will have a role to play in developing
- agri-food business opportunities and focusing measures to reduce GHG emissions from agriculture.

5.6. Re draft FSDI: 2.6 Sustainable Transport.

We refer to our comments in section 3 regarding the lack of effect policies such as Smarter Travel have given the lack of a hierarchy and integration of plans and policies; regardless of how worthwhile the aspirations and proposals are within them.

There is a need to recognise the on-going emphasis on car-based travel and motorway development at the cost of public transport initiatives – which has only been forestalled because of fiscal constraints. Commitment to sustainable transport needs to be supported by commitment to complimentary planning initiatives. The on-going proliferation of large out of town supermarkets and shopping centres perpetuate the demand for cars. A coherent and integrated approach is required. The transition to public transport solutions and walking and cycling needs to be supported by Government. The latter to providing not only emissions based benefits but wider health based benefits also. To achieve the current targets for non-car based transport would require a significant shift to public transport given a realistic view of what is feasible from walking and cycling particularly given Ireland's climate, topography and lack of cycle ways. However budget 2011 resulted in increases in the cost of bus and rail to commuters, which not only renders the networks less attractive, but undermines the capacity of the networks themselves. This is again an area where follow-through is required on the fiscal approach with the policy and targets proposed. Short term fiscal management requirements – are undermining the targets and sustainable policy intent of this sector.

29. Ensure continued implementation of Smarter Travel

Smarter Travel puts forward a set of overarching and complementary actions for delivering a more sustainable transport system by 2020. These cover the areas of land use and planning, use of fiscal measures, alternative travel modes such as public transport, improvement in vehicle fuel efficiency and strengthening of institutional arrangements. As a critical element in the delivery of a sustainable development strategy the Government will maintain its commitment and support the continued implementation of *Smarter Travel*. Specifically, *Smarter Travel* commits to implementing 49 actions grouped under the following overarching goals:

- Actions to reduce distance travelled by private car and encourage smarter travel, including focusing population growth in areas of employment, encouraging people to live in close

proximity to places of employment and the use of pricing mechanisms or fiscal measures to encourage behaviour change.

- Actions aimed at ensuring that alternatives to the car are more widely available mainly through a radically improved public transport service and investment in cycling and walking.
- Actions aimed at improving the fuel efficiency of motorised transport through improved fleet structure, energy efficient driving and alternative driving.
- Actions aimed at strengthening institutional arrangements to deliver the targets.
- Integration with land use and planning and planning decision making.
- Inventivise use of public transport over car based transport by commuters.

30. Examine feasibility of retrofitting gross polluter vehicles with NOx abatement technology

In addition to the measures proposed under *Smarter Travel*, assessing the feasibility and effectiveness of introducing a scheme to retro-fit gross polluter vehicles, e.g. heavy goods vehicles and buses, with NO_x abatement technology will also be considered.

5.7. Re draft FSDI: 2.7 Social Inclusion, Sustainable Communities and Spatial Planning.

Measures proposed in draft FSDI:

31. Developing sustainable communities

- ❖ **Effective implementation of the *National Spatial Strategy and the Planning and Development (Amendment) Act 2010* which will support the achievement of sustainable land-use and the development of sustainable communities.**
- ❖ **The implementation of Core Strategies in local planning. Zoning on a quantifiable consistent needs based approach (nationally and regionally) and a focus on resolving the difficulties with a stock of unfinished housing developments coupled to fiscal and taxation treatment of property and property related incomes.**
- ❖ **The tracking of local authority development plans, regional level monitoring through effective GIS systems and integrating the evidence from the national housing development survey**
- ❖ **The introduction of site and land value taxes**
- ❖ **The introduction of pricing mechanisms to protect 'the commons', air, marine resources, freshwater etc, and to provide free allocations for private members of society and support for those who need assistance, and a pricing mechanism for externalities**
- ❖ **The oversight by the National Co-ordination Committee on Unfinished Housing**
- ❖ **Developments of the implementation of the *Report of the Advisory Group on***
- ❖ **Unfinished Housing Developments, Resolving Ireland's Unfinished Housing**
- ❖ ***Developments* together with the Government's response to the recommendations,**
- ❖ **Resolving Unfinished Housing Developments**
- ❖ **The development of an integrated approach to Green Infrastructure as outlined in Measure 12. The Strategic Environmental Assessment (SEA) and Appropriate**

- ❖ **Assessment processes under EU SEA and Habitats Directives will assist spatial planning processes integrate green infrastructure into the policy making and implementation processes. The *Planning System and Flood Risk Management guidelines* which are aimed at ensuring a more consistent, rigorous and systematic approach to flood risk identification, assessment and management within the planning system will be also implemented. The efficacy and impact of these measures needs to be supported through the provision of training for staff, standards and enforcement.**
- ❖ **The further development and support of the Greening Irish Communities Network aimed at improving quality of life in communities.**

32. Social inclusion: Key National and EU Strategies.

The Government reiterates the key commitments in the *National Action Plan for Social*

Inclusion (2007-2016) and will work towards the elimination of consistent poverty in the population by 2016 and contribute to the attainment of the Europe-wide target in the *Europe 2020 Strategy to lift at least 20 million people out of risk of poverty and exclusion by 2020*. Ireland's contribution to this target is to lift 186,000 out of the risk of poverty and exclusion by 2016. The Government is undertaking a comprehensive review of the national poverty target, which was originally set out in the *National Action Plan for Social Inclusion* and further elaborated upon in *Ireland's National Reform programme under the Europe 2020 Strategy (2011)*. The purpose of the review is to enable the Government to adopt appropriate and achievable national poverty targets to meet Ireland's contribution to Europe 2020 and the commitments in the Programme for Government 2011.

33. Social inclusion: Housing

The Government will invest in the renewal, maintenance and management of social housing estates, including capital investment under traditional cyclical and planned maintenance programmes, as well as under the dedicated funding programme for retrofitting works to the existing local authority stock. A benchmark audit of the social housing stock will be undertaken to determine environmental sustainability and enable monitoring of quality.

Measures will be introduced to improve housing for vulnerable groups. Systematic procedures for the management and maintenance of Traveller specific accommodation by local authorities will be supported. Working through the National Traveller Consultative Committee, priority will be given to determining how Travellers can develop self-supporting approaches to meet their own needs. The Senior Alert Scheme will continue to provide enhanced home security. Additional measures will be implemented to address energy conservation and other measures for vulnerable older people. The Housing Strategy for people with a disability, 2011- 2016 published in October 2011 will be followed by a detailed implementation plan.

34. Social Inclusion: Support for Local and Community Engagement

The Government will continue to support local and community engagement in tackling poverty and social exclusion, including greater alignment between local government and the wider public service to enable more integrated and cost effective responses to target the needs of communities, in particular the most vulnerable.

35. Social Inclusion: Guidance on Disability Impact Assessment

The Department of Justice and Equality will undertake a pilot project to develop guidelines to consider the impact on people with disabilities of all significant proposals submitted to Government.

36. Social inclusion: Migrant integration

The Government will continue to develop comprehensive, coherent and transparent policies on migrant integration issues.

5.8. Re draft FSDI: 2.8 Public Health.

It is acknowledged that many of our systems of production and consumption present risks to human health (page 4 and 6 draft FSDI). There is also acknowledgement arising from Rio 1992 that polluters must pay, and the draft FSDI on page 10 proposes this in particular in relation to human health. However, in many cases we do not have the means by which we can detect the impact of pollution on health. Apart from cancer, and motor neurone disease, we do not have systematic disease registers for any other chronic illness. Further, the Irish Cancer Register does not systematically document exposure to pollutants; for example, information on past residence near a landfill, incinerator, industrial area, mobile telephone transmitter or other possible hazard is not obtained. Neither is the use of a mobile telephone, use of household chemicals, diet, alcohol, tobacco and other drugs recorded. There is a need for systematic surveillance mechanisms for diseases. There is at present a surveillance system for selected infectious diseases this needs to be extended to all chronic illnesses. We welcome the establishment of other disease registers, but these registers must also include exposure to risk factors along with basic demographic data (page 58). There is a need to collate this data on environmental factors, both positive and negative and correlate it with disease occurrence and severity, in order to determine potential risk factors and to facilitate appropriate actions; and/or to eliminate unnecessary worry based on what can be scientifically proven to be unfounded concerns. Objective data collation and analysis is the key. Additionally there is a need to finally address baseline data in relation to health of the Irish population.

37. Review of Policy Framework for a Sustainable Public Health System

To complete a review of public health policy with the aim of developing a policy framework for public health for the period 2012 to 2020.

38. Implement preventative interventions

The Government will implement an evidence-based programme of ill-health preventive interventions that are effective across the social gradient as follows:

- Continuing to tackle the harm caused to individuals and society by the misuse of drugs, the Department of Health will prepare the Report of the National Substance misuse strategy, including alcohol.
- The Department of Health will complete a policy to reduce tobacco consumption across the population.
- The Department of Health will publish revised healthy eating guidelines.
- The Department of Health will review a requirement for lifestyle surveys and develop proposals to progress these in the adult and childhood populations.
- The Special Action Group on Obesity established by the Department of Health will continue to focus on introducing a range of measures to tackle the issues.
- Meeting all commitments in terms of water, soil, hazardous chemicals and air quality, as well as additional measures outlined in this Framework within the specified timelines.

39. Improve availability of information on health inequalities

The availability of information on health inequalities and the health of vulnerable and socially excluded groups will be improved. A key deliverable is the establishment of indicators to monitor the effectiveness of existing policies in terms of access to healthcare and health services. The Department

of Health will develop further indicators relating to lifestyle including alcohol, tobacco, diet and physical activity.

40. Health Information Bill

When will the Department of Health will prepare legislation for the Health Information Bill?

41. Disease Modelling

Building on the work of the National Cancer Registry, national registers of other diseases will be created and developed. The Department of Health will continue to revise the list of notifiable diseases and consolidate infectious disease regulations.

Registries will be created to collate, track and examine possible causes of clusters of certain diseases or conditions, (eg. cancers, neurological disorders, endocrine/immune disorders...) as well as areas of particular well-being (transferring knowledge). Data collection could use bio-monitoring systems on individuals, assess locations for common possible stress-creating and polluting factors, as well as common social and ecological conditions that impact on communities. Additionally information on healthy communities should be collated including how they deal with stresses and adversity so this information and the benefits can be shared.

Add:

41a: Baseline information on the health of the Irish population.

Finally collation of baseline information on a range of critical factors indicating the health of the Irish Population will be initiated in Q1 2013, further to consultation with medical professionals on the information required. This information will be anonymous and made available from 2013 onwards and its collation and maintenance will be viewed as a priority as a critical indicator of sustainability and as a duty of care to Irish citizens.

5.9. Re draft FSDI: 2.9 Education, Communication and Behaviour Change

The Environmental Pillar welcomes a focus on education, communication and behaviour change and sees it as a fundamental requirement in the transition to sustainable development.

Education for Sustainable Development, ESD, involves the development of knowledge, skills and values for a sustainable world and covers areas of development, environmental protection, poverty reduction, good governance and decision making, equality, citizenship and social inclusion among others. Hence people need basic knowledge from the natural sciences, social sciences and humanities to understand the principles of sustainable development, how they can be implemented, the values involved and ramifications of their implementation. It is based on traditional disciplines of humanities & sciences; both natural & social. However, ESD is essentially interdisciplinary, which remains a major challenge for integration into formal, non-formal & informal education.

This section of the draft FSDI needs to make it clear that ESD needs underpin everything, and do so in an integrated and complimentary fashion. For example it makes no sense if a university is delivering a sustainable education course and running a Green Campus Programme – but at the same time delivers courses on farming, economics and engineering promoting unsustainable development or practices. In brief Sustainable Development needs to infiltrate everything we do therefore it must underpin and overarch all other activities not just run parallel to other activities. Therefore it's not just about promoting sustainable development, it's about making sure that all education is for sustainable development. The draft FSDI fails to address this.

Additionally despite mentioning the informal education sector in the first paragraph of the challenges none of the measures mention the informal sector. By focusing on the formal education sector it

totally misses all people outside of this very narrow sector ie anyone who is not in school or college. All citizens need to be supported and support the transition to sustainable development.

A Research Project on ESD in Ireland commissioned by COMHAR SDC and undertaken by ECO-UNESCO 2007 outlined the following recommendations for the future of ESD in Ireland:

- **ESD be given priority in all levels and forms of education – formal and non-formal.**
- Open and effective consultation mechanisms be used in the development and
- implementation of ESD at all levels to include children, young people and the interests
- of future generations.
- A National Strategy on ESD be developed and implemented with consultation from all
- relevant stakeholders.
- A National ESD forum and network be established to assist in the development of
- partnerships and dialogue in Ireland.
- Appropriate and adequate funds be made available to implement the National
- Strategy in all areas.
- Education for Sustainable Development principles and approaches be embedded in
- the formal curriculum in a cross-cutting, holistic way.
- Promote and support ESD in teacher training and in all professional development.
- A 'Whole Schools Approach' to ESD be encouraged and that the learning community be engaged in planning and decision-making to achieve a sustainable educational environment. Schools should take part in the Green Schools programme and develop sustainable policies and practices.

Similarly in 2011 the Convergence Sustainable Living Festival in Tipperary Institute was convened. This conference brought together educators passionate about sustainability from across Ireland to challenge the dominant educational paradigm and ask... "What role does third level and adult education have in progressing green jobs, sustainable development and resilient communities? The Declaration for Sustainable Education which arose proposes some very practical actions aimed at enhancing our education system such as:

- That all teacher education programmes include training in the principles of sustainable living
- That Institutes involved in teacher education and training develop methods of enhancing the knowledge, skills and understanding of teachers regarding sustainable living
- The inclusion of education in sustainable living in all formal and informal programmes of study funded by the Irish State
- The inclusion of the principles of sustainable living throughout the second-level curriculum and at primary level
- That civil society organisations, would be provided with supports to devise and implement a programme of practical behaviour change within local communities

That the Government facilitate the application of the principles of sustainable development by all state organisations throughout their activities including those relating to procurement, recruitment travel and other communication methods, bonus and rewards systems

There is also a need for vocational training and to foster life long learning around the themes of sustainable development.

The Irish approach to managing behavior change has been characterized as running an expensive advertising campaign. Best practice and successful achievements in behavior change need to be identified with a view to harnessing and leveraging such learning in Ireland. People respond to both positive and negative rewards 'carrot and stick'– both need to be used to motivate change toward more sustainable behaviors and choices.

Finally, In relation to Measure 42 - the outlined measures proposed are made in relation to another document "*A Strategy on Education for Sustainable Development*" which has not been published. Therefore it is not feasible to make comments on what is proposed within the draft FSDI given its reliance on this document when it is not clear what it proposes.

Measures Proposed in Draft FSDI:

42. Strategy on Education for Sustainable Development

A *Strategy on Education for Sustainable Development* developed under the direction of the Department of Education and Skills will be published in 2012. This strategy will provide the policy framework for the development of knowledge skills and values to encourage individuals, businesses and organisations to take action in support of a sustainable and just society, care for the environment, and responsible global citizenship. The Education for Sustainable Development Strategy will have four key objectives:

- Embed Education for Sustainable Development at every level of the education system.
- Promote public awareness of Education for Sustainable Development.
- Promote capacity building in support of Education for Sustainable Development.
- Promote high standards of environmental management in education institutions.

Specific actions in the Education for Sustainable Development Strategy will include:

Integrate ESD into all areas of the curriculum in schools and encourage cross curricular learning.

- Support national media and awareness campaigns on sustainable development.
- Promote research in 3rd level institutions and encourage collaborative working and industry links.
- Enhance the work of the Department of Education and Skills' Building Unit to promote low energy sustainable buildings.

The University of Limerick together with other key stakeholders, will continue to provide logistical support for, and participate in, the work of the Regional Centre for Expertise on

Education for Sustainable Development as a focal point for identifying research needs and best practice on Education for Sustainable Development

As stated above: The outlined measures here are made in relation to another document (*A Strategy on Education for Sustainable Development*) that we have not seen and which is in fact not completed. Therefore it is not feasible to make comments on what is proposed when it is not clear what is proposed

Add:

As noted already it is difficult to comment on the actions proposed as the underlining document has not been published – the following considerations for ESD are proposed however:

42a

- ESD be given priority in all levels and forms of education – formal and non-formal.
- Open and effective consultation mechanisms will be used in the development and implementation of ESD at all levels to include children, young people and the interests of future generations.
- A National Strategy on ESD will be developed and implemented with consultation from all relevant stakeholders.
- A National ESD forum and network will be established to assist in the development of partnerships and dialogue in Ireland.
- Appropriate and adequate funds will be made available to implement the National Strategy in all areas.
- Education for Sustainable Development principles and approaches will be embedded in the formal curriculum in a cross-cutting, holistic way.
- Government will promote and support ESD in teacher training and in all professional development.
- A 'Whole Schools Approach' to ESD will be encouraged and that the learning community be engaged in planning and decision-making to achieve a sustainable educational environment. Schools will take part in the Green Schools programme and develop sustainable policies and practices.

42b: Development and Implementation of appropriately targeted and configured ESD:

Government will support education for sustainable development throughout the informal education system by resourcing organizations and communities to deliver a full spectrum of educational possibilities'. These will range from ESD as delivered within the formal system to hands on learning via practical conservation and sustainability projects. A programme to address this will be devised further to consultation and implemented in Q3 2013???

Ireland recognises that ESD has to be delivered in situation and culturally specific ways so as to make it relevant and accessible all sectors of society by recognizing and catering for their specific situations, needs and abilities A programme to address this will be devised further to consultation and implemented in Q3 2013??

Ireland will support 'embedded' education for sustainable development by requiring institutions to implement sustainable behaviors thus educating workers/ pupils etc during normal functioning of the institutions (EG Green Schools Programme etc)

43. Communicating progress on sustainable development

The CSO and Sustainable EPA in line with it revised remit to protect a sustainable environment will provide on-going reporting on progress towards sustainable development ~~will take place~~ including progress on implementation of this Framework for Sustainable Development for Ireland, and be delivered on a quarterly basis in the Dáil by the Taoiseach, and commented on by the newly reconvened NSDC (formerly NESC)

Add:

43a: Sustainability in National Broadcasting:

The national broadcasting service RTE, both radio and television has not re-appointed an environmental correspondent further to the move of Paul Cunningham to the European Desk. In order to ensure a focus within the national broadcasting service, an appointment to this role will be made by end of Q2 2012, and the remit of RTE will be revised to prioritise focus on and programming on sustainability.

44. Encouraging Behavioural Change

Altering behaviour is essential to promoting sustainable development and will require a coherent approach in devising suitable policies and strategies to address this issue.

44a: Adopt best practice to effect necessary behavioural changes:

Best practice and successful achievements in behavior change need to be identified with a view to harnessing and leveraging such learning in Ireland. Ireland will actively pursue such a study in order to develop and implement a ongoing and appropriate change management approach from Q1. 2013 onwards.

Modify:

45. Aarhus Convention

Ireland will ratify the Aarhus Convention **by the end of Q1 2012** and incorporate the spirit of the Convention in the development and implementation of sustainable development policy to ensure the necessary buy-in from stakeholders and the general public in the transition to a sustainable economy and society. **Ireland will, in recognition of the importance of this measure and its delay in implementation, waive the 12 month grace period for access to the Compliance Committee of the Convention .**

5.10. Re draft FSDI: 2.10 Innovation, Research and Development.

We refer to our comments earlier in Section 3 on the failure of Government initiatives such as the Innovation Task Force to even consider the impact of the strategy or on the innovations encouraged on the environment. Such a silo based mentality is highly problematic. Equally comments earlier above in relation to the need to concepts and understanding of sustainable development to infiltrate every aspect of our educational system are critical to the success of delivering on a transition to Sustainable Development.

There is a need to research what isn't sustainable and to conduct a complete audit of our policies, processes, practices, operations, and all systems to see where they are incompatible with the ethos and requirements necessary to deliver on sustainable development.

A further concern pertains to the variation in the levels of funding proposed within the draft FSDI for Innovation, Research & Development as percentage equivalents.

Measures in the draft FSDI:

46. Deliver the right investment framework

To underpin the Framework for Sustainable Development for Ireland, appropriate levels of funding should be made available for research areas which are key to delivering sustainable development, such as in the energy agri-food and environment fields, as set out in the National Reform Programme. This includes improving the conditions for research and development, in particular with the aim of raising the combined public and private levels of investment in Research and Development to 2.5% of GNP (approx equivalent to 2% of GDP) maintaining designated environmental, policy-supporting research funding (e.g. the EPA's STRIVE programme and the Department of Agriculture, Food and the

Marine's Research Stimulus Fund) which identify solutions to tackle key environmental challenges and promote job creation and investment in the green economy.

Modify:

47. Bridge the gap in linking R&D to sustainable commercialisation and policy development

The Government will put in place measures to bridge the gap in terms of linking R&D and emerging technologies to commercialisation, by ensuring that the majority share of public funding supports R&D in the key areas identified in the National Research Prioritisation Report. As also identified in that report, research to support policy development and essential 'public good' research should also continue to be prioritised by Government, as a minority share of overall public R&D funding. Relevant Government Departments, Forfás, Teagasc, Enterprise Ireland, Science Foundation Ireland, the Environmental Protection Agency and other State agencies have a key role to play to ensure that research supported by public funds has an impact on the marketplace. Collaboration should be fostered between the funding agencies and between the business and research communities in Ireland, to the benefit of the economy as a whole.

Note : The insistence on commercialisation of research is flawed. We need to have pure research that takes a long view. Research has to be allowed to fail too and often it has been what has been pursued as the purest research that has yielded the greatest commercial results.

48. Focused research on sustainable development

Although some Government Departments and agencies already commission much research directly, there may be scope for more explicit alignment between such research and the policy goals of sustainable development. To support this process a R&D strategy for sustainable development will be developed by the EPA which coordinates the work of existing research programmes and funders in the area. Where possible it will be important to enhance the knowledge transfer dimension of such research programmes so that research drives changes in practice.

Add:

48b Audit and programme change in all areas which are contrary to Sustainable Development.

Ireland recognises there is a need to research what isn't sustainable and to conduct a complete audit of our policies, processes, practices, operations, and all systems to see where they are incompatible with the ethos and requirements necessary to deliver on sustainable development, and to consult and develop programmes to eliminate and/or rehabilitate/reform such conflicts.

Add:

48c Research into participatory and partnership models

Involvement of the public will be fundamental to the success of this Strategy, and research into best practice in public participation techniques and partnership models will be prioritised.

49. Postgraduate Training

The further development of university programmes that focus directly on sustainable development or are at least informed by the key sustainable development challenges will be encouraged. The Higher Education Authority, Teagasc and the two Irish research councils – Irish Research Council for Science, Engineering and Technology and the Irish Research Council for the Humanities and Social Sciences – already work together to encourage the development and training of postgraduate students and researchers in all areas of science, engineering, technology, humanities and the social sciences.

Teagasc work closely with third level institutes in the training and development of postgraduate students in the sustainable agriculture and food fields and the EPA provide scholarships to students to support the conduct of post graduate research (mainly at PhD level) in the environment field. Outputs from the EPA programme are used to inform decisions on environmental issues and also provide a valuable source of scientific information. This cooperation will be enhanced to promote further interdisciplinary research and training in sustainable-development themes.

50. Develop Ireland's green economy

Ireland's Green Economy should continue to be developed under the auspices of the Cabinet Committee on Climate Change and the Green Economy. A coordinated approach is required across Departments and Agencies in order to provide the right policy framework to take advantage of Ireland's exceptional resources in terms of natural and human capital. This should include the development of a clear vision, supported by research, of how Ireland can become a leader in the transition to becoming a low carbon, resource efficient and climate resilient economy.

Add

50a. Develop Ireland's BlueGreen economy

51. Ensure education and training provision is aligned with the skills requirements of the green economy

Education and training providers will seek to respond to the findings of the Expert Group on Future Skills Needs in relation to the skills requirements associated with the green economy, including putting in place measures to overcome potential key skills gaps identified for the sector.

52. Industry training networks for sustainability

Industry training networks will be supported where appropriate in order to deliver the required courses and skill sets needed for a resource efficient and low-carbon economy.

The decision to provide resources to a network should be based on the need for training in the industry sector to progress the transition to sustainability in Ireland, and on the capability of the proposed network to deliver on meeting this need.

53. Public service training

The public service will be encouraged and facilitated to deliver and provide new key skill sets in areas such as consultation, participatory processes and partnership, green procurement, carbon accounting, carbon management and energy management. How this should be achieved, and what bodies should take the lead in specifying, designing and organising the delivery of appropriate training will be considered by the Government following consultation across the key relevant Departments.

54. Graduate placements

Graduate placements will be made available for the unemployed to work in sustainability-focused roles in industry. Relevant government bodies will work with business representative organisations to develop a programme of graduate placements focused on sustainability and environmental management.

55. Role of Civil Society Organisations

Civil society organisations concerned with sustainability and the environment will be encouraged to continue to play an active role in education, training and informing the Government and the public on sustainable development issues. Agenda 21 will be placed back full and centre stage. Public

Participation will be seen as an essential priority in enabling the transition to a sustainable development model.

5.11. Re draft FSDI: 2.12 Global Poverty and Sustainable Development

There can be no greater commitment to resolving global poverty than to transition to a truly sustainable development model which recognises the shared and finite nature of the planet's resources and our management of our just and equitable share.

The Europe 2020 target of 20m fewer people at risk of Poverty in 750m population is not considered appropriate - where conservatively 20% are already in poverty. The definition of Poverty requires further defining and immediate updating.

56. Official Development Assistance

Under the Framework for Sustainable Development for Ireland, the Government reaffirms its commitment to the Millennium Development Goals and the outcomes of the 2002 World Summit on Sustainable Development. We have committed to the 0.7% of GNP target for Overseas Development Aid.

57. Address hunger and food insecurity in the world's poorest and most vulnerable households

Ireland will continue in its efforts to combat global hunger, and food and nutrition insecurity, and to further enhance its hunger reduction policies and programmes including by:

- Prioritising support for hunger reduction activities in Irish Aid's programme countries.
- Continuing to support initiatives focussed on sustainably boosting the agricultural productivity of poor smallholder and women farmers in sub-Saharan Africa.
- Continuing to support nutrition specific interventions that combat the irreversible effects of chronic under nutrition in early childhood, and scaling up a nutrition sensitive approach to food security
- Developing and supporting multi-sectoral national nutrition plans in developing
- countries, as outlined in the UN-led Scaling Up Nutrition (SUN) Framework and Road Map, and encouraging the integration of nutrition across all sectors – agriculture, health, water and sanitation, social protection and education – to ensure improved nutrition outcomes.
- Supporting capacity building within local Agriculture Ministries in Irish Aid's programme countries.
- Prioritising support for in-country agricultural research and knowledge and technology transfer focusing on reducing food and nutrition insecurity and improving the resilience of local food systems, and working to ensure that poor smallholder and women farmers have access to and can benefit from such research, knowledge and technologies to help them to grow nutritious foods for their families.
- Providing leadership through the ongoing development of and improving the resilience of Ireland's food production systems.
- Ireland will work to improve research in the area of global food security,

58. Financing climate change actions in developing countries

Ireland has signed up to the UN Framework Convention on Climate Change (UNFCCC) and is required to help more vulnerable countries with the costs of addressing climate change in accordance with the Copenhagen Accord 2009 and the Cancun Agreement 2010. Ireland is committed to meeting its responsibilities as a Party to the Convention, and will support a global and comprehensive post-2012 agreement that includes, inter alia, the objective of providing sufficient, accessible and predictable financing for climate change adaptation and mitigation actions in developing countries.

59. Trade

Ireland will seek to ensure that the EU position in relation to trade is supportive of a rules based trading system to underpin economic, environmental and social development in developing countries and which recognises the need for special and differential treatment of Least Developed Countries and some developing countries. Ireland will oppose and actively seek to ensure that exploitative initiatives characterised as 'resource grab' initiatives and exploitative trade agreements are not implemented by Europe.

60. *Mainstreaming environment and sustainable development*

The Irish Aid Programme will continue to integrate the principles of sustainable development into its activities. This will be done primarily through the existing *Environment Policy for Sustainable Development and Environment Mainstreaming* the performance of which will be reviewed and revised if necessary. Ireland will maintain its strong commitment to mainstreaming environmental concerns in ODA, including supporting developing countries to advance low carbon and climate resilient development plans, including in the agriculture sector.

61. *United Nations Conference on Sustainable Development*

Ireland will participate at EU level to ensure a successful outcome to the United Nations Conference on Sustainable Development to be held in Rio de Janeiro in 2012. Ireland will encourage participation of all relevant stakeholders and major groups to contribute as appropriate, through relevant fora, to the national preparatory process for the UNCS

2012. Ireland will be honest about its status and the extent of work it has to undertake and the revisions necessary to the draft FSDI, and work outstanding to complete a credible framework for Sustainable Development and commit to updating same as a completed framework by end of 2012

62. *Monitor implementation of the Framework for Sustainable Development for Ireland*

Progress on implementation of this Framework for Sustainable Development for Ireland will be monitored regularly and reported on – all reports will be independently verified and published on the department's website within 3 weeks of receipt by the Taoiseach and appropriate Cabinet Committee (see also Measure 63).

63. *Reporting on the Framework for Sustainable Development for Ireland*

Annex 2 identifies a lead Department and other Departments and agencies for each measure. It also identifies responsibilities and a timeline for delivery. Each Department will be required to report on the delivery of these measures and this process should be affirmed by relevant Departments in their Statements of Strategy. The Department of the Taoiseach will take the overall lead role to facilitate effective co-ordination and mandate across all Departments and state agencies. Progress reports will be delivered to the Oireachtas on an annual basis by An Taoiseach as described above as a part of the PDCA cycle.

64. *Training programmes for local authority staff and elected representatives and other relevant public bodies*

Sustainable development should be integrated into the training programmes for all deputies, civil and public servants, local authorities and other relevant public bodies, including in relation to financing and procurement.

65. Sustainability Assessment

The synergies between sustainability assessment and regulatory impact assessment will be examined.

66. Stakeholder Engagement for Sustainable Development

The Government will continue to support stakeholder dialogue and engagement. The

National Economic and Social Council will be renamed the National Sustainable Development Council, as part of the review of the NESDO Act, and will develop in a way that integrates all its work within the context of the FSDI. As outlined elsewhere, the involvement of the public in all decision-making is essential to the success of this Strategy. To this end research, training and the structures of governance must all be directed to the development and implementation of the tools necessary to create the maximum engagement of the Public in its further development and implementation, and the building of a national consensus on the sustainable future for Ireland beyond the life of this Strategy.

67. Sustainable development indicator set

The Government in conjunction with the wider public and on the basis of best international practices, will develop and adopt a sustainable development indicator set aimed at national policy making and the general public based on the conceptual framework at figure 21, in addition to a localised planetary boundary indicator set to assist in our understanding of our anthropogenic effects and the tolerance thresholds which we cannot exceed.

Headline indicators are a concise set of key indicators and will form part of a national set which is to be developed through a process of public participation by the CSO in consultation with the NSDC and the EPA, and building on work undertaken by Comhar SDC in this area. The development of the indicators should also reflect the evolution of EU productivity and key natural resources indicators, envisaged by the European Commission up to the period 2013. The CSO will collate and publish the agreed national and headline SDI set on a biennial basis with support from others such as the EPA, SEAI, ESRI, Forfás and NESC. Similarly a local indicator set will be developed in consultation with the Local Government Management Services Board and the County/City Managers Association.

68. Further development of the indicators

Over the course of the strategy, further research should be undertaken to further develop and improve the SDI sets. This should be led by the CSO, in consultation with the Department of Public Expenditure and Reform, with the support of key stakeholders referred to in Measure 67. The CSO will oversee the specifications for the indicators and any revisions to the indicator sets.

5.12. Requirement for a further section on the Forestry Sector in the draft FSDI.

A sustainable forestry program for Ireland will require the revision of the Code of Best Forest Practice, in consultation with relevant stakeholders, and the provision of associated national training, review processes in the whole chain of the forest industry, and the establishment of suitable monitoring of the implementation of this new standard.

A sustainable forestry program can deliver results under the headings of:

- Energy Security – Estonia derives 90% of its energy from wood.

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- Climate Change – carbon sequestration potential is negatively affected by large monocultures, and by clear-felling practices.
- AgroForestry – can help satisfy the greening component comprising 30% of CAP funding in most recent draft.
- Flood Prevention – a riparian planting program can form part of an integrated flood prevention strategy, with multiple ancillary benefits for tourism and biodiversity.

In order to assist in achieving a sustainable forestry program in Ireland there must be a commitment to:

1. Recognise the value of tree cover in Ireland in terms of inter alia; biodiversity, ecosystem services, soil improvement, climate change adaption, flood control and prevention.
2. Ensuring that the Forest Service monitor Irish forests and make their comprehensive reports easily available to the public.
3. Cease importing illegal timber
4. Police the widespread practice of deliberate scrub burning

6. Specific textual adjustments proposed

6.1. Context for this section:

Notwithstanding the overarching commentaries provided in Section 4 and 5 of this consultation response – certain specific sentences of the draft FSDI are commented upon here. However, this should in no way be taken as an indication that a list of small edits will suffice in addressing the significant deficits already outlined for the draft FSDI above.

6.2. Specific commentaries:

Note: The page number of the draft FSDI document is referenced, with proposed additions highlighted in green, and deletions signaled by a double-strikethrough.

Page 1 paragraph 1.1

Comment: The definition of Sustainable Development is uninspiring, fails to recognize the all-important context of the environment as the cocoon in which society and economics operate and without which they cannot exist, and assumes all is subordinated to the interest of human beings.

_____ 1.1 Sustainable Development: What does it mean?

The most widely used term in attempting to define sustainable development is “*development which meets the needs of the present without compromising the ability of future generations to meet their own needs.*”¹ Sustainable development is a continuous, guided process of economic, environmental and social change aimed at promoting well-being of ~~citizens~~ **humanity and the biosphere** now and in the future. To realise this requires creating a sustainable and resource efficient economy founded on a fair and just society, which respects the ecological limits and carrying capacity of the natural environment. **This strategy is based in the recognition: that the current economic system is a human construct and is consequently malleable but is at present driving a wide range of negative and in many cases irreversible changes to the natural environment; that human society evolved out of and is entirely reliant on the natural environment; and and that at present Ireland and the “developed world” are on a clear trajectory to destroy the very systems that support the diversity of life on earth and humanity itself.**

Comment: Failure to leverage the toolset of environmental law and policies, including should be included in the factors which led to the unsustainable trend

1.2 Sustainable Development is a priority for Ireland

In 2011, the economic situation in Ireland is dramatically different to the earlier part of the last decade. Measured against the standard indicators of GDP, GNP, trends for economic development, new housing output, tax revenues, and employment levels dropped sharply. We have also seen rising unemployment, a banking crisis and a collapse in the property market after a sustained, if unsustainable, boom in the property market. A number of factors drove these unsustainable trends, including: rapid growth in employment, large scale inward migration (annual immigration rose sharply from 52,600 persons in 2000 to peak at 109,500 in 2007), rapid natural population growth, fiscal incentives for the construction sector, **failure to effectively implement and enforce European Environmental Law, failure to adhere to the principles and policies laid out in the 1997 strategy for Sustainable Development – particularly in relation to over-zoning, failure to identify and manage**

within the context of resource constraints, effective rising car ownership and weakness in the strategic approach to spatial planning. At a time of rapidly rising prosperity and development, the existing structures and controls were insufficiently robust to withstand the pressures that inevitably arose.

Comment: In brief the paragraph below demonstrates a failure to understand what sustainable development is about and needs to be modified if it is to be maintained in the final document.

Despite the challenges, ~~much~~ some progress has been achieved in embedding the principles of sustainable development across all policy areas in the years since the publication in 1997 of *Sustainable Development: a Strategy for Ireland* ~~progress which was facilitated and assisted~~ This was accompanied by a prolonged period of economic growth which commenced in the 1990s and continued up to 2007. GDP growth averaged nearly 6% annually, well above the OECD and euro area rates over the period. This economic context has changed dramatically since 2007. On the one hand this has helped to ease some environmental pressures (e.g. traffic congestion, greenhouse gas emissions and waste management pressures), but this lessening of impact should not be equated with a sustainable approach to development. However, the very challenging economic outlook for Ireland also means that there is greater pressure on public resources. Protecting employment and enhancing competitiveness are vital priorities, particularly in the short to medium term, in line with current efforts to achieve economic recovery. There is a need to achieve positive economic, environmental and social outputs while at the same time ensuring equality and appropriate balance between the three pillars of sustainability.

Comment: This following comment is misleading and fails to identify the displacement of energy usage in component development, and also the impact of high value product development on the energy/GDP ratio.

The impression created here is completely contrary to other measures of Ireland's per capita footprint and resource efficiencies, and is inappropriate in the context of its position in the document and the incorrect perspective it creates of the challenges to be overcome. It should be corrected

Page 2

As a result, Ireland generally has good air and water quality. In addition, energy intensity, or energy use per unit of GDP, is also the lowest among OECD countries. **However this measure fails to identify the displacement of energy usage in component development, and also the impact of high value product development on the energy/GDP ratio. The reality is Ireland has the 10th highest global ecological footprint in the world according to WWF and Global Footprint Network 2010 Living Planet Report, and the 2010 EEA report on Sustainable Resource Consumption shows Ireland at three times the EU 27 average.**

Comment: the impression created here is of a greater level of advancement than is the reality. There is a need to be frank about the distance yet to be traveled.

To meet these challenges, Ireland will need to begin to strengthen its environmental management efforts; further integrate environmental concerns into economic decisions. Make economic decisions in the context of their real short and long-term social and environmental impacts; and reinforce international co-operation on environmental issues.

Comment: There is a need to be frank about the distance yet to be traveled.

Ireland's population is projected to increase further which will bring additional challenges and there is still a **long** distance to go before the aim of decoupling economic development from increased consumption of natural resources and environmental impact can truly be accomplished.

Page 3:

Comment: The statement below is disputed. The economic prosperity of the Celtic Tiger years did little to address investment in the infrastructure of our health services or any investment in prophylactic health management. The current focus on obesity in the midst of the downturn– is an adequate testament to this later point. There was a failure to leverage economic growth to provide for affordable and social housing and care facilities for the homeless. There is no resilience in our educational facilities to provide for additional staffing and special needs requirements for the most vulnerable children. Furthermore Ireland's track record on environmental non-compliance with European Law soared during the Celtic Tiger years. Therefore to say that it is acknowledged that economic growth, social cohesion and environmental protection go hand in hand just doesn't add up.

"It is widely accepted that economic growth, social cohesion and environmental protection **should** go hand in hand to meet the overarching goal of delivering wellbeing in a pluralistic society that promotes participation, a society in which everyone takes responsibility for the environment. However, despite the aspirations of the 1997 NSDS, this clearly was not the case, particularly during the so-called boom of the Celtic tiger years"

Comment: This sentence needs to be highlighted and also caveated to reflect the actuality by the additional phrase in green.

"There is a clear consensus at international, EU and national levels that a return to 'business as usual' is not an option, **but the commitment to the necessary changes remains an issue, and without that clear and widespread commitment this Strategy like its predecessor will largely fail to deliver.**

Comment: Re section on A resource-efficient Europe – Flagship initiative under the Europe 2020 Strategy.

Add: While the focus on resource efficiency in Europe 2020 is welcome, there remains a fundamental failure in this strategy to address the fact that resources are limited. Furthermore it should be noted there is no legislative basis to the framework, and Ireland is exempt from reporting on its Europe 2020 targets because of the Troika agreement. Therefore Ireland needs to establish a robust legislative basis for its own FSDI.

Comments: The following sentences as they stand are misleading and need to be at the very least caveated to acknowledge that while there is a growing awareness of limited resources there remains a fundamental failure in responding to that reality in a responsible, fair and sustainable manner. The consistent failure to broker binding agreements in relation to climate change even in the face of the publicity that one issue has got – is a salutary lesson on the challenges that pertain to managing sustainably our other resources:

This EU process is linked in with a world wide effort to promote the concept of 'green growth' and the 'green economy'. There is a growing consensus even in wealthier countries that our systems of production and consumption cannot be sustained without posing a huge threat to the environment and to human health. Whilst there is a limited if growing awareness of the limits to growth there remains a fundamental failure in responding to that reality in a responsible, fair and sustainable manner. The consistent failure to broker binding agreements in relation to climate change even in the face of the publicity that one issue has got – is a salutary lesson on the challenges that pertain to managing sustainably and our other resources:

Comment: This type of statement should be in the first paragraphs of page 1, not down in page 4.

"...our systems of production and consumption cannot be sustained without posing a huge threat to the environment and to human health. Water scarcity, air and water pollution, climate change, resource depletion and irreversible biodiversity loss are problems that have to be tackled as a matter of priority.

page 6

Comments: Further to the issues with an FSDI based on Europe 2020 above – the following addition is proposed to this section:

The EU adopted its first Sustainable Development Strategy in 2001 with revisions in 2006 and 2009. The strategy provides the overarching policy framework for all EU policies and strategies. The 2009 strategy recognises that significant additional efforts are needed in a number of areas, particularly in the effort to address and adapt to climate change, to decrease high energy consumption in the transport sector and to reverse the current loss of biodiversity and natural resources. This EU SDS is a more appropriate base for Ireland's FSDI than Europe 2020.

Page 7

Comment re Figure 1: Current and Projected Population for Ireland (Source: CSO) . It is considered that this scenario and upward trend at this level is most unlikely given the level of emigration of Irish Nationals and exodus of foreign workers and their families to their home countries or other countries with better employment prospects.

Comment: Where is the objective, empirical evidence for this statement:

"At national level, the publication in 1997 of *Sustainable Development: a Strategy for Ireland* led to significant progress in the development and implementation of policies and action across most sectors.

In the absence of same – and based on the experience and issues experienced within Ireland's environment, economy and society, the Environmental Pillar proposes the sentence be modified.

"At national level, the publication in 1997 of *Sustainable Development: a Strategy for Ireland* led to some development of policies but very little in the way of effective implementation or real impact of policies and action across most sectors.

Page 9

Comment: The following needs to reference the EU NGO doc on EU Budgets and relate this to Ireland

A central plank of Ireland's economic recovery will centre on the development of a green economy that recognises:

- the opportunities for investment and employment creation in emerging sectors such as renewable energy, energy efficiency and waste and water management, and
- that this sustainable approach to economic development complements the core strength of our economy in the use of natural resources in the agriculture, forestry, fisheries, tourism and energy sectors.

Comment: This is the type of comment that should be on page 1 – not buried on page 9!

The OECD Strategy *Towards Green Growth* indicates that green growth is needed because risks to development are rising as growth continues to erode natural capital. If left unchecked, this would mean increased water scarcity, worsening resource bottlenecks, greater pollution, climate change, and irreversible biodiversity loss. If we want to ensure that the improvement in living standards over the past fifty years is maintained, we have to find new ways of production and consumption, and even redefine what we mean by progress and how we measure it.

Page 10

Comment: Section 1.4 should be section 1.2– not buried on page 10!

Comment: The following provides no clarity on how sustainable development is to be promoted, what the governance process and structure is and how it will be effected:

1.5 A framework for sustainable development

While a wide range of initiatives fall within the scope of sustainable development, this

Framework for Sustainable Development for Ireland should not be seen as the sum of all relevant actions across Government. This Framework will be most effective by deepening and widening sustainable development through focusing on key challenges, identifying the gaps and committing to the actions that are needed to mainstream and deliver sustainable development.

page 13:

Comment: *The bullets under the sentence "This Framework for Sustainable Development contains a range of measures to address the key challenges and priorities which will deliver change, and support the delivery of a sustainable development agenda."* -new bullet point - need to include and integrate and adjust traditional measures of progress to go beyond growth indicators and include measures of well-being and ecological integrity as concluded in Rio 1992 – which some 20 years on we still have not done.

Page 14

Comment – this is the sort of material which needs to be in the initial first pages of the document

The importance of integrating social and environmental dimensions into measures of sustainable economic performance is now well recognised internationally. Current economic indicators such as GDP were never designed to be comprehensive measures of societal well-

being. Therefore, complementary indicators are also needed that are more inclusive of other dimensions of progress.

page 21:

Comment under the section Pressures and Possibilities – An important caveat and priority requirement needs to be included to state: Europe's policies on ring fencing the resources of less developed nations needs to be challenged, So the following addition is proposed highlighted in green:

While recognizing that **Europe's** policies on ring fencing the resources of less developed nations needs to be challenged as a priority, ~~using~~ **Using** natural resources more efficiently will allow Europe to achieve objectives set out in EU 2020. It will:

- be key to making progress to reducing greenhouse gas emissions by 80-95% by 2050;
- assist in preserving natural capital and the services that it provides;
- ensure that agriculture and fisheries sectors remain strong and sustainable;
- make Europe more resilient to future increases in global energy and commodity prices;
- contribute to the security of supply of food, energy and raw material supplies;
- contribute to food security in the developing world; and
- improve quality of life and well being for citizens.

Page 26:

Comment it is hard to be convincing and convert people if you don't believe yourself - and in providing a drive for the transition to sustainable development – the credibility of the document is never more at issue than on page 1 with the priority focus on economics and in the comment below. It is not that the Environmental Pillar does not understand the importance of economic systems – but they are artifices of human construction – and not ends in themselves, and can be, and indeed need to be restructured. In brief the most compelling reasons for the protection of ecosystems, habitats and species is the ability to maintain the essential elements for life. A document advocating sustainable development should reflect that. So the following modification is proposed to sentences below.

According to the United Nations Food and Agriculture Organisation, 40% of the world's economy is based directly and indirectly on the use of biological resources. This provides one of the most compelling reasons for the protection of ecosystems, habitats and species.

According to the United Nations Food and Agriculture Organisation, 40% of the world's economy is based directly and indirectly on the use of biological resources. While **the most compelling reasons for the protection of ecosystems, habitats and species is the ability to maintain the essential elements for life,** ~~This provides one of the most~~ **this** ~~also~~ provides a compelling reasons for the protection of ecosystems, habitats and species.

Page 27:

Comment: This material should be on page 1/ initial pages of the document.

The UN Millennium Ecosystem Assessment focused on the link between ecosystems

and human wellbeing and concluded that approximately 60% of the Earth's ecosystem services examined are being degraded or used in an unsustainable way.

Together with the following:

Ireland's economic and social development is dependent on a healthy natural environment; therefore, resources must only be used at a rate which allows them to be replenished and must be preserved to ensure their long term use and survival.

Note: Further changes are of course provided for in the context of Section 5 of our response in relation to the sectoral measures:

Page 73

Comment: The importance of the role of the citizen in environmental monitoring needs to not only be recognized but actively supported, and measures should include privacy and confidentiality, as neighbours and work colleagues and employees can be very compromised in reporting environmental breaches. Therefore the following addition is proposed:

...broader commitment to environmental monitoring and up-to-date reporting of environmental pollutants and wastes, using the best available information and technologies, **and including and actively providing for the citizen as monitor -** will make environmental governance more effective. This includes reducing long-term remediation costs through early action.

Page 74

Comment: CDB's need to be given a priority Sustainability remit in addition to their existing roles, therefore the following addition is proposed:

CDB strategies have a strong social emphasis and many have identified sustainable development actions for implementation. **CDB's need to be given a priority Sustainability remit in addition to their existing roles, and accordingly renamed City/County Sustainable Development Boards:**

Comment: This type of acknowledgement needs to be repeated throughout the document – and needs to be extended to all sectors of society and education including the judiciary.

However, there is still a need for improved awareness, training and capacity building on sustainable development within local authorities, ~~and~~ other relevant public bodies operating locally, **the judiciary, as well as all sectors of society and educational systems both formal and informal.**

Comment: The following needs to be governed by a reality-check in light of the undermining of the C&V sector, and should include an articulation and associated commitment to effect or realize what is required :

CDBs and local Community and Voluntary (C&V) Fora therefore **should** play an important role in advancing Local Agenda 21. **However this role needs to be strengthened and facilitated.**

Comment: The true context needs to be provided for RIA – which is rarely utilized, therefore

Ireland also has a system of Regulatory Impact Analysis (RIA) which involves a detailed assessment of the impacts of regulation and should involve consultation with

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stakeholders and citizens. Its purpose is not to substitute decision-making, but to help inform policy decisions. While this tool is rarely used currently, more effective use of this tool will be made in the future, and integrated with other environmental assessment techniques to facilitate informed decision-making.