

# ***Comhar* – the National Sustainable Development Partnership**

## **Comments on cross-cutting issues relating to the Operational Programmes, 2000-2006**

### **Introduction**

*Comhar* welcomes the opportunity to comment on the draft Operational Programmes for the period 2000-2006. Given the short time which has been available to us for consideration of the draft OPs, it has not been possible to be as comprehensive as we might have wished. We have therefore focused on identifying major issues, including textual comments, in the drafts provided to us. Those comments are being directed to the relevant OP Managing Authorities. However, we believe that there are also a number of important issues which are relevant to all of the OPs, and some comments on these are included in this general paper, which is being sent to all of the Managing Authorities.

### **Issues relating to Monitoring Committees**

#### Membership

We welcome the decision to appoint *Comhar* to all monitoring committees. However, this should not be seen as substituting for the need to have representation of environmental interests (both NGOs and authorities) on the Monitoring Committees. *Comhar*'s remit is sustainable development, which is broader than purely environmental issues. As such, we regard this inclusion as broadening the range of the committees to include sustainability issues. However, it does not replace the need

for environmental representation, particularly in view of the Government commitment to eco-auditing of policies and programmes. We would also like to see the role of the Environmental Protection Agency enhanced, particularly in view of its function as an important provider of environmental information and a contributor to both environmental and sustainability indicators; this is especially relevant to monitoring.

#### Criteria for the work of Monitoring Committees

We feel it is important that monitoring/evaluation criteria should be clearly set out at the beginning of the process. Proper monitoring, by definition, requires that such be done. However, this does not appear to be the case in the draft OPs which have been supplied to us. One model that might be useful for the Monitoring Committees is LogFrame Analysis (Logical Framework Analysis), such as is used by the Department of Foreign Affairs in its ODA projects.

#### Role of Monitoring Committees

We are aware that, in the past, the role of the Monitoring Committees has been limited in the main to financial monitoring. It is our view that this is inadequate, and needs to be changed for the new Programme period. The monitoring and evaluation of broad progress under the OPs, rather than solely progress in expenditure, should be part of the functions of the Committees. Given that the Monitoring Committees bring together a broad range of sectors/interests, with their own experience and expertise, it should be expected that these would be used in a proper evaluation of whether each OP is meeting its objectives and targets. This expertise would also be useful in allowing the Committee to evaluate the proper integration of policies within, and between, Operational Programmes, and also their integration with broader national policy.

## **Eco-audits**

We welcome the Government commitment to the eco-auditing of policies, including Operational Programmes, and the introduction of a pilot scheme to this effect. However, we are concerned that this commitment does not appear to be reflected in all of the draft OPs. For example, we have noted the lack of any overall eco-audit in the two regional Programmes.

It is also important that eco-audits should be carried out fully and effectively. While accepting that this policy is at an early stage and requires further development, we are not happy, from the evidence in the draft Operational Programmes, that the principle of eco-auditing is fully understood or accepted. For example, the pilot eco-audit included in the draft Employment and Human Resources Development OP indicates that there will be no potential impacts on the environment whatsoever, either positive or negative. This is not a realistic assessment, and we would be concerned that it may indicate an inadequate appreciation of eco-auditing.

Our consideration of this issue has raised a further, broader point. This is that, while eco-auditing of a particular policy or programme may, of necessity, concentrate on the direct impacts or consequences of specific measures, the potential indirect impacts should not be overlooked. Using the example again of the draft Employment and Human Resources Development OP, such indirect impacts include the consequences of the increased incomes, and hence purchasing power, which may be expected to result from enhanced employability and skill levels. These consequences include increased consumption of goods (household and consumer items), services (including travel and holidays), energy and natural resources, as well as increased waste production and air pollution. We recognise that this is a far broader issue than any individual OP can address, but one which requires attention in the arena of wider national policy, *inter alia*, through structural changes in the economy and society. However, it cannot be ignored in the process of eco-auditing, if that is to be a tool for achieving sustainable development.

## **Integration**

A crucial point which must be taken into account across all Operational Programmes is the need for proper integration of the various policies proposed. This is particularly important given the amount of overlap between the various programmes. We have noted elsewhere the overlap between the two Regional OPs; other areas where such overlap may occur include tourism (regional OPs and Productive Sector OP), agriculture (CAP Rural Development Plan and regional OPs) and forestry (Productive Sector OP and CAP Rural Development Plan). We have noted above the potential for this issue to be part of an expanded role for the Monitoring Committees, and recommend that provision be made for necessary liaison between them in relation to areas where overlap occurs.

It will also be necessary to ensure that the measures carried out under the various OPs are integrated with all relevant national policies and strategies to avoid any contradiction. Two areas which particularly come to mind in this regard are the forthcoming National Greenhouse Gas Abatement Strategy and the National Spatial Strategy. The former will have implications for a wide range of sectors and policy areas, including transport, energy and agriculture; it will be crucial for the success of the Strategy that measures in these individual policy areas, including relevant measures in the Operational Programmes, take account of and are implemented in support of the national policy. With regard to the National Spatial Strategy, which is to be completed by the end of next year, this will also have relevance for a number of OPs, particularly in relation to issues of regional development.