

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

**Comments on the draft Employment and Human Resources
Development Operational Programme, 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, these comments are not as comprehensive as we might have wished. However, we feel that a number of important issues need to be raised at this point.

Before commenting on specific aspects of this OP for Employment and Human Resources Development, there are a number of general comments which we wish to make. We have identified a number of general cross-cutting issues, common to all of the OPs, and have prepared a separate paper on these. The comments on this particular OP should be read on conjunction with those on the more general issues.

Owing to the short time available to us for consideration of the draft OPs, we have focused to a considerable degree on trying to identify major issues – including gaps or omissions – which need to be addressed in finalising this Programme. In some cases, it has only been possible to draw attention to general concerns, without time for elaboration. Were more time available, we might wish to draw attention to other issues also. If possible, we may address these at a later stage.

Some specific comments on the draft, and issues arising from it, are set out below.

Section 1.2.4 Rural development

It would be useful to refer in this section to the National Spatial Strategy (NSS) which is currently being developed. The first consultation paper on the NSS, issued by the Department of the Environment & Local Government, notes that one of the key challenges to be addressed by the Strategy will be *“to identify ways in which deficiencies, including accessibility, in terms of social inclusion and knowledge-based human resources and their spatial spread might be addressed in the process of balanced regional development.”* This is relevant to this OP; Employment and Human Resources development must recognise and support policies such as developing new urban gateways while taking account of the employment and training needs of populations outside these centres. We suggest that the OP should make some reference as to how it will relate to the development of the NSS, which is to be completed within two years.

Section 1.2.5 Environment

General

We believe it would be useful to include some reference here to sustainable development – especially as the section starts by referring to *“ensuring that development is sustainable ...”*. A suitable reference might take the form of recognising that attention also needs to be given to the inter-relationships between environmental, social and economic issues, which are at the heart of sustainable development.

On a specific example, we believe that, in exploring the scope for an environmental module in certain training and education courses, consideration should also be given to including a sustainable development module in relevant training courses. Training and education in many fields, including agriculture, forestry, fisheries, tourism and many industry-related apprenticeships, can have serious environmental/sustainable development impacts if sustainable development is not an intrinsic part of the course. Conversely, the inclusion of environment and sustainable development modules may

have positive and beneficial environmental effects. We therefore recommend changing the text from “*explore the scope for an environmental module in certain training and education courses*” to “*develop and deliver sustainable development modules in all training and education courses, particularly in agriculture and fisheries*”.

Also on the subject of training, we further recommend that some programme be developed around sectoral training for Sustainable Development. This would include topics such as alternative energy, recycling, etc., and should be seen as an investment in the future, developing Irish expertise in technologies which will be of increasing importance. We would also suggest specific training around the Social Economy.

Eco-auditing

Comhar welcomes the introduction of a pilot scheme for the eco-auditing of policies. However, we believe that the eco-audit should be included in the Operational Programme itself, rather than in the Programme Complement as suggested in section 1.2.5 and Appendix X.

We are further concerned that this OP places a lot of emphasis on the fact that it is primarily concerned with “soft” investment measures having limited environmental effect. In this regard, the pilot eco-audit included in Appendix X does not reflect potential impacts on the environment. Although these may be difficult to quantify in advance of specific projects/measures, to indicate in the table in the Appendix that there will be no impacts at all is totally unrealistic. Apart from not dealing with potential negative impacts, the eco-audit should include references to planned training/education modules on the environment and sustainable development, which might be expected to have positive environmental impacts.

In making these comments, we are particularly conscious of the need for the eco-audit to address the indirect effects of proposed measures. We have dealt with this point in our paper on issues relevant to all OPs, which should be read in connection with these comments. We would reiterate here that this is a particularly important issue in this

OP, which is concerned less with physical changes (e.g. building and infrastructure development) than with measures which, by improving potential earning capacity, may ultimately have very serious impacts in terms of consumption and production.

Section 2.1 OP objectives

Comhar welcomes the objectives of the OP as largely supporting the social aspects of sustainable development, e.g. by promoting improvements in employment, education, equal opportunities and social inclusion. We welcome the focus on addressing social exclusion, equality and the development of the Social Economy. In this regard, we believe that the social economy initiatives taken to date need to be thoroughly examined and reviewed, and a distinction drawn between viable community enterprises and social economy initiatives that provide a service to low-income populations and which will always need long-term support and funding. In other words, projects which have a social or environmental value should not be judged solely on whether or not they are economically viable. We believe there is a need for a definition of Social Economy to take account of this point, as at present there are widely differing views among State agencies in this regard.

Section 2.3.3 Adaptability

We would prefer to see the reference to the need to “*meet the current and emerging skill needs of the economy*” changed to refer to the “*needs of society*”, which would be more in keeping with sustainable development. However, even in terms of the “needs of the economy”, there is a need to look to the future and not focus entirely on the ITC sector. Sustainable development is undoubtedly going to become more and more important into the future for the EU, and the world. Therefore it would make strategic sense for Ireland to invest in developing skills and expertise in these areas.

Section 5.1.2 Establishment and composition of the OP Monitoring Committee

Comhar welcomes the commitment (made in section 1.2.5) to have environmental representation on the OP Monitoring Committee. In our general comments on the structure and functions of Monitoring Committees for all OPs, we have pointed out that *Comhar*'s brief relates to sustainable development, and not solely to the environment. The composition of the Committee as set out in section 5.1.2 does not, we feel, fully reflect the commitment in section 1.2.5.