

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

### **Response to the Department of the Environment & Local Government's paper "Key Sustainable Development Indicators"**

#### **Introduction**

1. COMHAR agrees that a set of sustainable development indicators is needed in order to measure progress, but is uncertain as to whether the proposed indicators identified in the paper are the best for this purpose. Much of the paper seems to have been written from the perspective of what data was already available, and it does not adequately identify gaps in data which must be filled to facilitate the long-term development of indicators. We also feel that the range of agencies involved in the development of sustainable development indicators needs to be broadened.
  
2. COMHAR sees the purpose of the proposed set of headline indicators as two-fold:
  - Firstly, the indicators should measure progress towards sustainable development;
  - Secondly, they should highlight issues and objectives so as to increase general understanding.
  
3. We understand that the proposed indicators document is to be aimed at the general public. It will be important to give thought to how the indicators are presented, so as to make clear to the intended audience what is involved. We recommend that a graphic/pictorial form be used, showing trends over time

where possible, accompanied by a short and clear commentary (as in the EPA publication on environmental indicators, *Environment in Focus*). Particular attention should be paid to the content of this commentary, so that the message is easily understood and properly interpreted. This text will be crucial, in that it needs to not only explain the indicator chosen, and the implications of the trend, but also indicate the linkages between various indicators and with policy objectives. In this regard, we also propose that the presentation should include a summary table which clearly shows these linkages (see paragraph 11) and which can serve as a useful introduction to the set of indicators.

### **Data limitations**

4. We accept that there are limitations to the data available in some areas, and this will, to some extent, constrain development of indicators in these particular areas in the short term. However, this should not mean that indicators should be totally conditioned by the availability of data, but rather that steps must be taken to fill important gaps in data for the longer-term development and refinement of suitable/necessary indicators.
  
5. It is also important that, even where data is available, attention needs to be paid to the choice of what is included in measuring the indicator, so that it illustrates progress on sustainable development. Available data also needs to be connected in order to provide indicators – an example would be in relation to wetland loss, where it would be possible to show this from satellite photographs. It will also be important to consider anecdotal evidence, particularly when disaggregating data to local levels, rather than simply including only those statistics which are easily available.

**Need for further work**

6. There is a need both for a short-term publication as currently envisaged, and for the development of longer term work in relation to indicators. More detailed work will be required in particular for policy makers; one opportunity which might be taken in this regard is the project on national progress indicators which is being undertaken by NESC under the PPF. We also wish to flag the need for more work in the longer-term on disaggregation of indicators in respect of different groups within society, in order to highlight specific problems not shown by averaged or higher-scale indicators.
  
7. Another area where further work may be done at a later stage is the development of local versions of the national indicators, e.g. at local, county or city level, on an appropriate participative basis, which would increase the relevance of the indicators to the public.
  
8. Further work should also be done on developing green national accounting. The EU has developed various initiatives towards a common mode of green accounting, recognising that measuring the national income without taking account of the environmental implications of economic activity cannot show whether or not economic growth is sustainable. We recommend that green national accounts be developed for Ireland, following on from the Pilot Environmental Accounts published by the Central Statistics Office in May 1999, and taking account of the EU work in this area.

**Review**

9. We recommend that the initial indicators chosen should be reviewed after a period of three years, both for their continued relevance and to see whether

they need to be refined, added to, or even replaced. Such review should also take account of changed circumstances and new issues arising.

**Comments on the key indicators proposed**

10. We recommend that the indicators should not be divided into the three headings used in the paper (economy, society and environment), as this does not give a proper picture of the complex inter-linkages which are a feature of sustainable development. There are several areas of overlap – for example, the paper considers unemployment under both the headings of economy and society, yet in the end recommends employment as an economic indicator and unemployment as a social one. Apart from the presentation, there also needs to be a better balance between the different areas covered – at present, the indicators proposed under the heading “environment” far outweigh the other two types.
  
11. Our working group looked at refining the specific indicators proposed from a range of perspectives; however, having considered these issues, we now propose an alternative approach, which we feel would more usefully meet the Department’s objectives of public communication/understanding of indicators and encouraging behavioural change. Our proposed reformatting of the indicators into a table (as referred to in paragraph 3) will help to illustrate the linkages between and across indicators and with policy objectives and specific targets, where these exist. The proposed structure of the table is included in **Annex 1**; we have partially completed it to illustrate how the various indicators might be linked to objectives, and have also used as examples some of the areas which we considered (recognising that further work is necessary in some cases). We recommend that the Department should reformat its proposed headline indicators using this table structure to enhance their presentation and understanding.

12. For the record, the areas/amendments considered in regard to the Department's proposed set of headline indicators are reproduced in **Annex 2**, and we would ask that they be taken into consideration in future work on further developing sustainable development indicators.

**Communication and dissemination**

13. We suggest that in addition to the actual publication, the Department should seriously consider using radio and television as a means of communicating and disseminating the indicators. One suggestion within this overall media framework would be to arrange/support an annual programme – perhaps including a debate – which would highlight the trends in the indicators, their implications, the extent to which progress was being made towards sustainable development, and the links with behavioural change.

## Annex 1

*Note: The examples shown in this table are not intended to be an exhaustive list of objectives or indicators. Rather, the intention is to recommend an approach to be followed and the format of a table for use by the Department in its work on an initial set of key headline indicators. However, COMHAR acknowledges that further details need to be developed in the medium-term work which we intend to undertake, and we reserve the right to make recommendations for a better set of key headline indicators arising from that work.*

<b>OBJECTIVES</b>	<b>EXAMPLE OF KEY INDICATOR</b>	<b>COMMENT</b>
<b>Sustainable Economy</b>		
Improving resource efficiency	Energy consumption per unit of output; Recycling rates	
Economic stability & competitiveness	GDP/GNP; Rate of inflation; Investment (Total; social, i.e. health & education; environmental)	
Maintaining high levels of employment	Participation rates (including gender breakdown)	
Developing skills	Education participation rates (including adult and continuing education); drop-out rates	Graph depicting participation rates for primary, secondary & third level (including vocational/technical)
Sustainable consumption (households)	Energy & water consumption per capita (per household?); % of goods (e.g. food) sold in Ireland which are produced in Ireland	
<b>Building sustainable communities</b>		
Tackling social exclusion & poverty	Long Term Unemployment rate; Poverty? (Child poverty?); income gap	Poverty measure from NAPS Need for later work on disaggregation by group.
Better health	Life expectancy rates	Need for later disaggregation by groups within society
Access to housing/ accommodation	Housing stock - %unfit Numbers on housing list Homelessness	Trends if available

	Household formation Affordability of rent (% of disposable income)	
Promoting sustainable travel	Length of journeys undertaken by car per household Modal split	Or journeys to work/school by mode
Sustaining the quality of the built environment	Listed buildings?	
Cultural heritage	Irish speakers?	
Natural areas	Land designated as SAC, NHA Bird population Biodiversity	
Participation	Election turnout (national and local)	Other indicators to be developed
Crime	Juvenile crime; racially motivated incidents	
<b>Managing the Environment &amp; Resources</b>		
Access to clean water	Drinking water quality Surface water quality Pollution data	
Maintaining & improving air quality	Greenhouse gas emissions; other pollutants	Link between air quality and health (e.g. asthma)
Sustainable waste management	Proportions of waste recovered, recycled, sent to landfill, etc.	
Sustainable land use management	Forestry: % land covered by forestry; % broadleaves/evergreens Agriculture: % full-time/part-time employment; % land used for organic agriculture	
Sustainable fisheries and aquaculture	Fish stocks statistics	
<b>International co-operation &amp; Development</b>	ODA trends Party to international agreements	Include global dimension Rio, Kyoto, etc.

## **Annex 2**

*Note: notwithstanding the point made in paragraph 10 above, for ease of reference, the headings given below are those used in the Department's draft document.*

### **Economic**

Other indicators which could be considered here include:

- capital investment, savings, R&D expenditure
- both GNP and GDP should be used, as they are easily available
- participation rates - e.g. gender breakdown – might be more focused than simply “employment” (see general comment in paragraph 9 of this paper)

### **Social**

Poverty must be included as an indicator; surely there are already suitable indicators developed, e.g. under the National Anti-Poverty Strategy? Other aspects which should be included are:

- long-term unemployment is the crucial measure
- health; also, mortality rates of age cohorts might be more significant than life expectancy
- Housing – more than a single indicator is needed here. We feel that more appropriate indicators would be the numbers on housing lists, and also new household formation trends, if possible to measure.
- Crime – possibly broken down to show, e.g., juvenile crime.

Some measure of participation rates in community/society activity should be included; this might measure issues such as access to decision-making and the operation of partnerships (not necessarily formal). While much participation is a local issue, the national indicator would be made up of local participation. Pending further work on devising some indicators, perhaps election turnout rates might be used in the short-term.

### **Environment**

We feel it would be more appropriate to follow the sectoral example (energy, transport) by including the economic sectors set out in *Sustainable Development: A Strategy for Ireland* – i.e. agriculture, tourism, etc. This would also help to illustrate linkages with policy objectives, and to measure progress in implementing policies.

A number of areas are totally missing, i.e. built environment, landscape, heritage and culture, and noise. In addition, we believe that additional indicators need to be included in some areas, as follows:

- Energy – should include measures of percentage derived from renewable sources, and of carbon intensity
- Transport – should include air transport, and some measure/proportion for public transport (not just passenger numbers or journey numbers)
- Waste – should include packaging, litter, hazardous waste
- Nature – better measures should be found for biodiversity and landscape; examples might be the proportion of forestry/broadleaves, or of land covered by REPS
- Water – artificial fertiliser sales are not an adequate indicator, as this is not the sole source of phosphorus/nitrate enrichment. We also feel that drinking water should be included, with breakdowns to show different categories such as group water schemes.