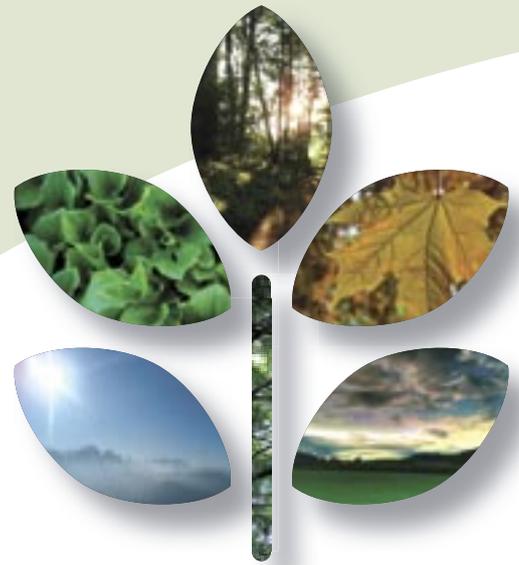




Comhar
Sustainable Development Council



Recommendations on the Review of the National Sustainable Development Strategy



Recommendations on the review of the National Sustainable Development Strategy¹





Table of contents

Key messages and recommendations	X
1 The challenge and promise of sustainable development	X
2 The policy context	X
2.1 The new EUSDS: setting the template for a revised NSDS	X
2.2 The revised Irish National Sustainable Development Strategy (NSDS)	X
2.3 Input by Comhar SDC	X
2.4 Stakeholder consultations	X
2.5 Actors	X
2.6 Comhar recommendations for the NSDS	X
3 Seven key challenges for sustainable development	X
3.1 Climate change	X
3.2 Sustainable Transport	X
3.3 Sustainable consumption and production	X
3.4 Conservation and management of natural resources	X
3.5 Public health	X
3.6 Social inclusion demography and migration	X
3.7 Global Poverty and Sustainable Development Strategies	X
3.8 Spatial planning	X
4 Better policymaking, governance and crosscutting issues	X
4.1 The Irish context	X
4.2 Recommendations for policy integration	X
4.3 Fiscal and macroeconomic measures	X
4.4 Communication, awareness and education for sustainable development	X
4.5 Research for sustainable development	X
5 Monitoring and measuring sustainable development	X
5.1 The Irish context	X
5.2 Recommendations for monitoring and measuring sustainable development	X
Annex 1: Availability of data for EU SDI set	X
Annex 2: Recommendations on issues to be addressed in a national action plan on sustainable consumption and production	X
Annex 3: Findings from Comhar stakeholder events on the NSDS	X

Key messages and recommendations

Ireland's Sustainable Development Strategy is the template for ensuring that our economic and social development can continue into the future in conjunction with the protection and enhancement of the environment. Ireland published its first National Sustainable Development Strategy (NSDS) in 1997 (revised in 2002 in the run-up to the World Summit on Sustainable Development in Johannesburg, South Africa). Following the adoption by the European Union of a revised EU Sustainable Development Strategy (EUSDS) in June 2006, Ireland is currently preparing a revised NSDS and the Government is committed to publishing this in 2007.

This document outlines Comhar SDC's recommendations on the themes and content of Ireland's revised NSDS. The recommendations have been informed by feedback from three workshops (held in Dublin in April 2007 and in Cork & Sligo in July 2007) and have been approved by Comhar Council members.

Sustainable development is both a vision and a process. It rests on the three pillars of environmental protection, economic development and social progress. Effective delivery of the revised NSDS will require this overarching policy framework to be adopted and led at the highest level of government. It is also dependant on effective communication and engagement with key sectoral interests and civil society.

The principal recommendations are:

Climate Change and Clean Energy

- The NSDS should reiterate Ireland's commitment to its target under the Kyoto Protocol and state that Ireland will contribute, through further reductions, to the overall EU target of reducing greenhouse-gas emissions by at least 20% below 1990 levels by 2020.
- The annual review of progress to be undertaken by the Department of the Environment, Heritage and Local Government, in accordance with the commitment in the Programme for Government, should provide an assessment against specified benchmarks (including the annual 3% cut in emissions foreseen in the new Programme for Government), and a clear timetable for policy measures.
- A national strategy for communicating climate change should be put in place to raise awareness and mobilise different societal actors to the problem and their role in addressing it.
- Carbon-proof all new fiscal measures to ensure that they do not drive a rise in greenhouse-gas emissions and other pressures on the environment, but rather encourage emission reductions.
- Identify the key areas where Ireland can provide credible leadership in regard to addressing climate change and low carbon energy, e.g., managing increased wind-energy penetration in the electricity sector, how to maximise energy efficiency performance with a dispersed settlement pattern.



Transport

- The NSDS should help define what sustainable transport means in an Irish context and present a vision of an alternative sustainable transport future to business as usual.
- The shift towards charging all users for the full social, economic and environmental cost of transport infrastructure, including congestion charging, should take into account the availability of public transport options, social justification for public transport, including the need to provide choice of transport mode as a means to more sustainable communities.
- The NSDS should provide a clear signal that land-use planning and transport planning will be fully integrated and propose concrete ways that these policy areas can be integrated.
- Encourage a shift to more environmentally friendly fuels, e.g. biofuels, in public transport, government vehicles and other captive fleets, with full regard to the social and environmental impact of such alternative fuels.

Sustainable Consumption and Production (SCP)

- The NSDS should commit to the adoption of a national Sustainable Consumption and Production action plan within two years of publication of the revised NSDS including the development of clear guidance for the integration of sustainable development criteria into all public procurement decisions.

Conservation and Management of Natural Resources

- The NSDS should commit to the review and strengthening of the National Biodiversity Plan by mid 2008.
- The NSDS should assign responsibility for completion of a national inventory of outstanding landscapes and commit to the preparation and implementation of a national Coastal Zone Management strategy.

Public Health

- Food labelling should be improved to provide consumers with appropriate information on the provenance and nutritional value of food.
- Land-use planning and transport planning at all levels of government should promote walking and cycling as well as a shift to public transport, to encourage a more active lifestyle and the reduction of air pollution.
- Ensure compliance with relevant standards, e.g. for drinking water.

Social Inclusion, Demography and Migration

- The NSDS should reiterate the key commitments in the National Action Plan for Social Inclusion 2007-2016 (NAPSI), and include an ambitious target for reducing the number of people at risk of poverty.
- The NSDS should also place additional emphasis on the problem of adult literacy beyond the NAPSI goal of reducing illiteracy among people of working age from the current 27%-30% to 10%-15% by 2016.

- There is a need to develop comprehensive, coherent and transparent policies on immigration and integration; barriers to integrations relating to lack of access to permanent status, non-recognition of qualifications, delays on family reunification need to be acknowledged and addressed.

Global Poverty and Sustainable Development Strategies

- The NSDS should reaffirm Ireland's commitment to the Millennium Development Goals and to raise its volume of Official Development Assistance (ODA) to 0.7 of Ireland's gross national income by 2012.
- Separate from ODA funding, the Government should investigate the possibility of investing in specific projects under the Kyoto Protocol's Clean Development Mechanism that meet minimum social and environmental standards.

Spatial Planning

- The revised NSDS should commit Ireland to the integration of planning and future transport systems, a fundamental requirement to arrest the negative trends associated with urban sprawl.
- The revised NSDS should give full consideration to reforms of local government funding and taxation particularly the recovery of some element of land value appreciation arising from planning gain.

Better policy-making, governance and crosscutting issues

- The High Level Interdepartmental Group should continue to oversee the delivery of the revised NSDS after its adoption to provide for more integrated policy making and implementation.
- Existing Regulatory Impact Assessment methodologies for policy development should be reviewed in the light of best practice on sustainability impact assessments.
- The government should promote coherence and complementarity between the revised NSDS and other national policy strategies.
- Regional and local authorities should drive the implementation of regional and local sustainability; local structures, such as city and county development boards, city and county partnerships, leader groups and local energy agencies, should be adequately resourced to deliver the local sustainability agenda in partnership with local communities.
- The NSDS should reiterate a general principle of support for macroeconomic and fiscal measures that encourage more sustainable behaviour e.g., through extension of the "polluter pays principle", phasing out of environmentally harmful subsidies and greening of public procurement.
- A specific communications and awareness campaign should be undertaken to support the implementation of the revised NSDS. The campaign should be forward-looking and focus the positive lifestyle choices that are consistent with sustainable development.
- The NSDS should commit to the adoption of a national action plan for education for sustainable development (ESD) within one year of the publication of the revised NSDS.
- Establish a programme of Sustainable Development Research Fellows in government departments that help integration of latest knowledge into departmental decision-making, and its links to the wider strategic challenges of the Agreed Programme. Comhar SDC is willing to act as facilitator of this network.



Monitoring and measuring sustainability

- An appropriate set of sustainable development indicators (SDIs) should be published with the revised NSDS to provide a basis of measuring progress on sustainability and a means to effectively communicate this to the general public.
- A hierarchical approach to SDIs should be used enabling the indicators to inform decision-making, benchmark and measure progress over time and measure the implementation of the strategy.
- The SDI set should incorporate relevant indicators that are already used by the European Union to minimise duplication of effort by statistical agencies in collecting and analysing data; the development of the indicator set should be adequately resourced.



1 The challenge and promise of sustainable development

The establishment of a more sustainable pattern of development for Ireland for the future is one of the key challenges of government. Sustainable development is an open and evolving concept and may be difficult to define; identification of unsustainable trends may be easier to do. However, there is a growing acceptance that economic growth, social cohesion and environmental protection must go hand in hand. Of course, concerns about competitiveness cannot be ignored but it must be remembered that a poor environment may adversely affect competitiveness. Climate change, loss of natural resources, extinction of species and environmental damage caused by emissions and waste are the results of unsustainable patterns of consumption and production. These negative trends have worsened globally in recent decades despite the advances in technological innovation and improvements in the efficient uses of resources. Ireland's development has been characterised by these negative trends despite improvements in living conditions and reductions in some kinds of pollution (e.g. local air pollution).

Although not acting now will involve higher future costs, there are real social and economic benefits to be gained from progressive environmental policies. Sustainable development offers a vision of harmonious, integrated and well-balanced pattern of economic development that fully takes into account the social and environmental dimensions and the needs of future generations as well as the present. On one level, sustainable development offers the prospect of economic development that is "decoupled" from resource use and environmental degradation, in other words reducing the relative impact of economic development on our natural resources. But ultimately sustainable development holds up the prospect that economic development can lead to an overall improvement of society and the natural resources – air, water, biodiversity – on which it is based, creating sustainable societies that steward resources and improve conditions for both current and future generations.

The challenge is to integrate sustainable development into a policy framework that is also driven by the discipline of competitiveness. The adoption of the revised National Sustainable Development Strategy provides the opportunity for renewed vigour in the implementation of this vision. Comhar SDC believes that the revised strategy should:

- provide an overarching policy framework adopted and led at the highest level of government,
- highlight positive synergies between environment and competitiveness, (including in the area of environmental technologies),
- recognise the links between the environment and human wellbeing,
- recognise that living within ecological limits must be the basis for social and economic development,
- make clear that there are costs of inaction,
- communicate better what sustainable development involves,
- inspire and engage the interest and commitment of civil society.



2 The policy context

Ireland published its first National Sustainable Development Strategy (NSDS) in 1997 (revised in 2002 in the run-up to the World Summit on Sustainable Development in Johannesburg, South Africa²). Following the adoption by the European Union of a revised EU Sustainable Development Strategy (EUSDS) in June 2006,³ Ireland is currently preparing a revised NSDS and the Government is committed to publishing this in 2007.

2.1 The new EUSDS: setting the template for a revised NSDS

The revised EUSDS sets out a single coherent strategy on how the European Union will live up more effectively to its long-standing commitment to meet the challenges of sustainable development. The key objectives of the revised EUSDS are:

- Environmental protection
- Social equity and cohesion
- Economic prosperity
- Meeting international responsibilities

The EUSDS highlights the synergies with the Lisbon Strategy for growth and jobs; both strategies recognise that economic, social and environmental objectives can reinforce each other and they should therefore advance together. The revised EUSDS, therefore, defines sustainable development more broadly than just the environmental sphere. Comhar SDC supports this wider vision of sustainable development. At the same time, Comhar SDC recognises that the environmental dimension in the revised NSDS must be strong with ambitious but achievable targets.

In this draft position paper, Comhar SDC focuses particular attention on the “gaps”, those elements in the EUSDS template that are not already being addressed, and on helping make partnership a reality. Comhar SDC plans to make the implementation of the revised NSDS the main theme of its annual conference, scheduled for November 2007.

2.2 The revised Irish National Sustainable Development Strategy (NSDS)

The EUSDS includes thematic targets and requires Member States to report on progress meeting these goals. It addresses the governance dimension, including policy coherence and complementarity with national strategies and a framework for reporting on national implementation. This process included a report by the Irish Government to the European Commission in July 2007 (and most likely 2009 too) with a publication of a report by the Commission in September 2007 and consideration by the European

2 DEHLG (1997), “Sustainable Development: A Strategy for Ireland”; DEHLG (2002), “Making Ireland’s Development Sustainable”. Available on <http://www.environ.ie/DOEI/DOEIPol.nsf/wvNavView/Sustainable+Development:+A+Strategy+for+Ireland?OpenDocument&Lang=>

3 http://ec.europa.eu/sustainable/welcome/index_en.htm

Council (the meeting of Heads of State and Government) in December 2007. The partnership agreement between Government and the social partners, *Towards 2016*, commits the Government to a review of Ireland's national sustainable development strategy in 2007.⁴

The revised NSDS will serve as a statement of national policy and a roadmap for future action. The NSDS should be consistent with the EUSDS but should be tailored to Ireland's specific national circumstances. The Department of Environment, Heritage and Local Government (DEHLG) has set up a High Level Steering Group, made up of representatives from all Government Departments, to coordinate input to this renewed strategy from across the Government sector.

2.3 Input by Comhar SDC

The purpose of this document is to provide recommendations to the Government on the themes and content of the NSDS. A primary consideration is to what extent the revised NSDS should be aligned with the EUSDS and whether Irish aspirations should be matched to the same targets. The DEHLG has also invited Comhar SDC to consider the following questions:

- What should be the focus of the renewed National Sustainable Development Strategy? Should it be green/environmental or much broader?
- What is the purpose of a National Sustainable Development Strategy?
- What do Comhar SDC members think that a National Strategy for Sustainable Development should offer – to policy makers? To citizens?
- Should the renewed National Sustainable Development Strategy focus on a review of where we've come to since 1997 and how we've come to that place? Should it be primarily forward-looking with only a very brief look back for the purpose of setting a context?
- What would Comhar SDC members see as being key elements of a renewed National Sustainable Development Strategy?

Comhar SDC also commissioned research on three key topics relevant to the review of the NSDS. These reports are available on the Comhar website (www.comharsdc.ie) and are attached to this report:

- Sustainable Development Indicators,
- Education for Sustainable Development, and
- Sustainable Consumption and Production.

2.4 Stakeholder consultations

In preparation of these recommendations, Comhar SDC sought comments from stakeholders in different ways, particularly through stakeholder meetings in 2007 (18 April in Dublin, 9 July in Cork and 11 July in Sligo). This document attempts to reflect the common threads of the feedback received throughout.

4 Department of the Taoiseach (2006), "Towards 2016, Ten-Year Framework Social Partnership Agreement 2006-2015". Available on <http://www.taoiseach.gov.ie/index.asp?locID=181&docID=2755>



The full reports from the stakeholder events are attached separately. Several key points from these stakeholder meetings are worth emphasising.

Awareness on sustainable-development themes has risen in Ireland over the past decade. This has translated into well-informed opinions about various policy measures. The plastic bag tax, the ban on smoking in the workplace, An Taisce's Green Schools programme and the growth of a multicultural Ireland were all mentioned as positive developments.

On the other hand, many comments reflect a disconnect between what is necessary to make Ireland's development sustainable and what is being done by individual citizens and by government. Although the audience at the stakeholder events might not be a perfect reflection of Irish society as a whole, the fact that participants found many more failures than successes since the adoption of the sustainable development strategy in 1997 are an admonition of attempts to date to make Ireland's development sustainable. Many participants referred to inertia in policymaking, the lack of capacity in different public services, the failure to monitor or meet targets, and major failures to connect different parts of the policy process together, such as transport and land-use planning. Participants also drew attention to the need for better communication and public awareness initiatives to promote more sustainable lifestyles; in particular, some participants mentioned that Government missed the chance to exploit the momentum from the success of the plastic bag levy and smoking ban to bring in other measures. At a fundamental level, participants thought that sustainable development seems to be secondary to the priority of economic development. This is a policy failure of the sustainable development agenda, since its essence is to reconcile economic development with the protection and enhancement of society and the natural environment.

Looking forward, it is possible to discern a latent desire for a stronger approach to sustainable development. Common themes include better communication, education; and empowerment of citizens through information and engagement of citizens, including minority groups. Participants also mentioned specific measures like the improvement of building stock, investing in public transport and renewable energy, and horizontal measures like shifting taxation away from environmentally friendly goods.

Participants felt that government has a leading role to play. This role could range from integrating sustainable development into all government departments (perhaps helped by creating a new minister for sustainable development or other measures for cross-departmental co-ordination), to public procurement, to providing the additional staff and resources to address the key challenges, to leading by example, for instance by providing public sector commuters with appropriate incentives to take public transport to work. Participants had quite strong views on the challenge of implementation, which requires not just strong (sometimes radical) legislation but also education, communication, consultation and persuasion as well as clear strategies for the implementation and delivery of goals. There was some support for measures that would require (rather than just encourage) certain behavioural changes, such as banning incandescent bulbs and non-rechargeable batteries and forcing public bodies to improve their environmental performance.

2.5 Actors

Progress on sustainable development will depend on enabling people to act together and the revised NSDS should create a supportive framework for collective progress.⁵ Government needs to set the framework for a collective approach to change and work with stakeholders and sectoral interests in the implementation of the strategy. Political leadership is needed to tackle difficult issues necessary to move beyond the short-term time horizon and to mobilise support for long term goals. This requires institutional reform as well as the introduction of fiscal measures and incentives to achieve the identified targets and goals. Cross-sector integration must be strengthened as well as the integration of sustainability at the different levels of government from national to local. Everyone in society can make a difference, so key stakeholders including business, community-based organisations and other civil-society groups must be involved in the implementation process.

Comhar SDC is well placed to engage stakeholders in this process. As a multi-stakeholder council, the unique nature and the strength of Comhar SDC is its broad representation which supports the development of informed and balanced perspectives and recommendations. We welcome the extension of our remit in the new Programme for Government and we look forward to facilitating ongoing stakeholder engagement in the implementation of the new NSDS.

2.6 Comhar recommendations for the NSDS

Comhar SDC offers a series of recommendations to the Irish Government on the content and process of the revised National Sustainable Development Strategy. The following sections in this document make specific recommendations on the seven key policy challenges identified by the revised EUSDS. Later on the document addresses crosscutting issues such as governance and better policy-making as well as monitoring and measuring sustainability.



5 This approach is captured in the title of the UK strategy on sustainable consumption and production: "I will if you will. Towards Sustainable Consumption" (2006) UK Sustainable Development Commission and the National Consumer Council



3 Key challenges for sustainable development

The revised EUSDS identifies seven key challenges and corresponding targets, operational objectives and actions. These challenges relate to worsening environmental trends, the European Union's economic and social challenges as well as new competitive pressures and new international commitments. The seven challenges are:

- climate change and clean energy
- sustainable transport
- sustainable consumption and production
- conservation and management of natural resources
- public health
- social inclusion, demography and migration
- global poverty and global sustainable development challenges

Comhar SDC recommends that the NSDS focus on the same seven challenges, all of which are relevant to Ireland. Focusing on these seven challenges will ensure that the NSDS complements the EUSDS. This section sets out Comhar SDC's recommendations for how the NSDS should address each of these seven challenges.

There may be a need to add additional thematic areas to reflect Ireland's specific conditions. Comhar SDC recommends the inclusion of an additional key challenge that is specific to Ireland: spatial planning.

3.1 Climate change and clean energy

EU climate policy is based on the overall target of limiting global temperature increases to no more than 2°C above pre-industrial levels in order to avoid dangerous climate change. The revised National Climate Change Strategy 2007-2012 (NCCS) focuses on meeting Ireland's obligations under the Kyoto Protocol to limit its emissions to 13% above 1990 levels for the period up to 2012. Under current trends, however, Ireland is not on track to meet its emission target through domestic measures alone and compliance with the Kyoto Protocol can only be achieved through the use of the protocol's so-called flexible mechanisms (e.g. by purchasing credits from emission-reducing projects in other countries). Comhar welcomes the commitment in the new Programme for Government to agree an all-party approach to climate change targets and, in the interim, to set an average reduction of 3% per year in emissions. The 2007 White Paper on energy policy sets out a national target of 33% of electricity consumed to be from renewable sources.

3.1.1 Recommendations

- Kyoto Protocol: The NSDS should reiterate Ireland's commitment to its Kyoto target and state that Ireland will contribute, through further reductions, the overall EU target of reducing greenhouse-gas emissions by at least 20% below 1990 levels by 2020.
- Post-2012 commitments: Ireland should adopt ambitious targets that complement the EU targets to 2020 and 2050. The specific target should be defined in full public consultation with all stakeholders and should address all parts of the economy. Development of new climate change targets should be evidence based and enshrined in legislation. This will drive the process of emission reduction and provide a clear long-term framework, which is necessary to provide certainty to investors with a long-term planning horizon, for instance electricity-generation companies.
- The NSDS should also recognise the link between the environment and poverty reduction and impact of climate change on the likelihood of meeting the Millennium Development Goals, underpinning the need for Ireland to take significant action domestically on emissions.
- Identify the key areas where Ireland can provide credible leadership in the European Union in regard to addressing climate change and low carbon energy, and how to exercise such leadership. The areas which should be assessed in this regard include: managing increased wind-energy penetration in the electricity sector, how to maximise energy efficiency performance with a dispersed settlement pattern, intensifying abatement options in agriculture, the role of forestry in sequestration, adaptation to climate change in some particular respect such as land use policy and management.

The NSDS should also set out the following steps that can be taken immediately and will help Ireland to correct its GHG emissions trajectory:

- Carbon-proof all new fiscal measures to ensure that they do not drive a rise in greenhouse gas emissions and other pressures on the environment, but rather encourage emission reductions.
- The annual review of progress (as provided for in the Programme for Government) should provide an assessment against specified benchmarks, including the annual 3% cut in emissions, and provide a clear timetable of policy measures to provide certainty to economic actors.
- A minimum amount of Ireland's emission reductions (e.g. 75%) should be generated through domestic measures rather than flexible mechanisms.
- A summary of the costs and benefits associated with policy options across all sectors in order to assess the best policy options.
- Greater attention to adaptation, which requires more detailed analysis and further policy measures than just protection against flooding.
- Set in place a national strategy for communicating climate change to raise awareness and mobilise different societal actors to the problem and their role in addressing it.



3.2 Sustainable Transport

The Department of Transport is currently working on a Sustainable Transport Action Plan (STAP), to be published by the end of 2007, with the overall goal of achieving a sustainable transport system by 2020.⁶ The scale and complexity of the challenge of achieving sustainable transport is illustrated by the fact that greenhouse-gas emissions from the transport sector grew by 160% since 1990.⁷ The Programme for Government commits to the implementation of *Transport 21* on time and on budget, but additional policies and measures to those foreseen in *Transport 21* will be required to cut travelling times, improve safety, deliver commuting choice, reduce congestion and protect the environment. Comhar particularly welcomes the commitment in the new Programme for Government to introduce a multi-criteria analysis of all transport projects to take into account environmental factors on a whole project basis.

3.2.2 Recommendations

The revised NSDS should provide the broader context for the Sustainable Transport Action Plan; it should help define what sustainable transport means in an Irish context and present a vision of an alternative sustainable transport future to business as usual. This should include indicative targets for various aspects of the transport sector, including the desired profile of journeys by modal shares and the average fuel-intensity of the public and private motor fleet. The revised NSDS should also:

- Provide a commitment to accelerated investment in the public-transport elements of *Transport 21* to deliver an integrated and efficient urban and rural public transport network as a priority
- The shift towards charging all users for the full social, economic and environmental cost of transport infrastructure, including via congestion pricing, should take into account the availability of public transport options, social justification for public transport, including the need to provide choice of transport mode as a means to more sustainable communities
- Provide a clear signal that land-use planning and transport planning will be fully integrated and propose concrete ways that these policy areas can be integrated, e.g. through strong and independent national institutions with an appropriate mandate and research capacity to formulate and implement integrated policies
- Change the growth trajectory of fuel use and carbon emissions in the private transport sector, especially by adjusting taxes to move towards a fuel- and carbon-efficient car fleet
- Encourage a shift to more environmentally friendly fuels, e.g. biofuels, in public transport, government vehicles and other captive fleets, with full regard to the social and environmental impact of such alternative fuels. In this respect Comhar welcomes the commitment in the new Programme for Government on minimum requirement for the use of biofuels in state owned and public transport vehicles but cautions that appropriate measures must be taken to ensure that the biofuels are produced from sustainable sources.⁸

6 DCMNR (2007), White Paper on Irish Energy, 38

7 European Environment Agency (2007), "Transport and environment: on the way to a new common transport policy", 17

8 The Programme for Government commits to working with "EU partners to require biofuels used in transport to comply with an environment certification system which incorporates sustainability criteria in terms of biofuels production"

3.3 Sustainable consumption and production

There is growing interdependence of economies and in Ireland we do not rely just on our own natural resources but also on those of the rest of the world. To sustain the Earth's population at the levels of consumption of the Irish population would take more than three planets' worth of resources. The Johannesburg Plan of Implementation committed to the development of "a 10-year framework of programmes in support of regional and national initiatives to accelerate the shift towards sustainable consumption and production (SCP)", with a focus on policy responses in the EU and OECD countries. The 10-year framework is being developed to strengthen international cooperation and increase exchange of information and best practices to facilitate the implementation of national and regional programmes to promote sustainable consumption and production.

In Europe, Governments are trying to secure more joined-up policy development at EU level, using the concept of SCP – through influence on the Commission's thematic strategies on resource productivity and waste/recycling under 6th Environmental Action Programme; the next steps on Integrated Product Policy (IPP); the Action Plan on Environmental Technology; and the proper linking of the EU Sustainable Development Strategy with the EU "Lisbon agenda" on competitiveness and innovation. The European Commission's communication on a renewed Lisbon Strategy includes a focus on eco-innovation. The OECD has published a number of studies focusing on sustainable consumption and production, with useful material on public procurement, the corporate sector, governance dimensions and clarification of SCP concepts. The OECD studies focus on the effects of the public policy framework on firms, households and the public sector.

Although there is no coordinated national programme in Ireland for sustainable consumption and production, a number of Government policies and programmes are in place to support good practice as well as specific initiatives by other key stakeholders, e.g.:

- The Cleaner Greener Production Programme, a grant programme launched by the Environmental Protection Agency in 2001 to encourage companies to adapt or improving the environmental performance of their production processes and services
- Enterprise Ireland's free environmental information portal for small- and medium-sized enterprises, www.envirocentre.ie; sponsorship of the Environmentally Superior Products initiative, which helps manufacturing companies assess ways to reduce the environmental impact of their products; and grant support for companies to install a certified Environmental Management System
- Business-driven initiatives like Business in the Community Ireland (www.bitc.ie), the Irish Business and Employers Confederation's Environment Awards for Industry, and the Association of Chartered Certified Accountants in Ireland Sustainability Reporting Awards, rewarding corporate environmental and social performance reporting
- Labelling schemes like Fairtrade Mark Ireland, operated by the Irish Fair Trade Network



3.3.1 Recommendations

Comhar SDC recommends that the revised NSDS recognise ecological limits and commit to the adoption of a national action plan for SCP within two years of publication of the revised NSDS. The national action plan for SCP should address:

- The case for prioritisation of sustainable consumption and production, in the domestic and international economy including the linking of sustainable consumption to national consumer policy.
- Intensification of coordination of public sector green public procurement capacity and training.
- Strategic economic recommendations on improving resource productivity, linking business competitiveness with the embrace of environmental technologies.
- A review of Environmental Technologies market/financing opportunities at home and overseas e.g. links to opportunities to be pursued under the Kyoto Protocol's Clean Development Mechanism.
- Measures to promote improved production and services, including the agri-food sector, that reduce the environmental impacts from the use of energy, resources or hazardous substance.
- The factors driving business to take up of measures consistent with sustainable consumption and production and identification of additional measures e.g. product re-design, localization, lean manufacturing, clean production, Corporate Social Responsibility, and labelling of products and services.
- A review of supports for household and consumer/citizen action in support of SCP Communications, Citizenship and Culture.
- Measures to support individual and household decisions to re-articulate the link between consumption and quality of life (e.g. use of the private motor car versus less commuting distance/time).
- Development of recommendations by sector (e.g. energy, food, water, mobility, construction etc.), timelines for action (e.g. short-, medium-, long-term), implementing agencies/delivery mechanisms and opportunities (e.g. enhanced cross-border energy/economic cooperation).

The revised NSDS should set clear guidance for the integration of sustainable development criteria into all public procurement decisions, focusing initially on energy efficiency. Time-bound targets should be established for government departments, semi-state agencies and local authorities. The recommendations on issues to be addressed in a national action plan on sustainable consumption and production are described more fully in Annex 2.

3.4 Conservation and management of natural resources

Strong economic performance must go hand in hand with the sustainable use of natural resources, the prevention and minimisation of waste, maintaining biodiversity and the protection of ecosystems. The Millennium Ecosystem Assessment focused on the link between ecosystems and human wellbeing and concluded that approximately 60% of the ecosystem services examined are being degraded or used unsustainably. The European Union aims to halt biodiversity loss within the Union by 2010 and to restore habitats and natural ecosystems. EU initiatives supporting the achievement of this target include the

decoupling of income from agricultural production under the reform of the Common Agricultural Policy (CAP); addressing unsafe fish stock levels in the reform of the Common Fishery Policy (CFP), the creation of the NATURA 2000 network, as well as initiatives encouraging and promoting sustainable tourism.

In Ireland, as elsewhere, economic sectors such as agriculture, forestry, marine and tourism are reliant on the effective conservation and management of natural resources. While some progress has been made, significant challenges lie ahead:

- Farming and forestry occupy 70% of Ireland's land area (predominantly grassland and animal production). There are areas where farming contributes significantly to distinct cultural landscapes and sustains a human population that might otherwise have long migrated elsewhere, while also contributing to many important semi-natural habitats such as bogs, fens and upland grasslands. Farming also leads to significant environmental problems such as the overloading of water bodies with phosphates and nitrates, however. The decoupling of subsidies from agricultural production may change the pattern of land use: intensification of farming practices will lead to increased use of fertilisers and chemicals, whereas the abandonment of other land may result in the loss of biodiversity.⁹
- Despite a policy-driven increase in afforested land to over 10% of the total land area, Ireland's forest cover is well below the European average (almost 40%), and maintaining the target of 30% broadleaf as a proportion of all new afforestation will be difficult.
- Many plants and animals remain under threat because they are unable to adopt changes in environment brought about by human activities. Local authorities and government departments have been slow to finalise their own biodiversity action plans.
- Over 75% of marine fish stocks in Irish waters are outside safe biological limits.
- Tourism, an increasingly vital industry (employing 150,000 people), depends on the preservation and conservation of environmental capital and the potential impacts of tourism activity. A large influx of visitors can have negative effects on sensitive ecological areas.
- Despite improvements in recycling rates for municipal waste, meeting Ireland's target for the recycling of biodegradable waste under the EU Landfill Directive poses a significant challenge.

3.4.1 Recommendations

Comhar SDC recommends that the revised NSDS should:

- Commit to the completion of designation of NATURA 2000 sites as envisaged in the National Biodiversity Plan and to review and strengthen that plan of the by mid-2008.
- Commit to the resourcing and implementation of management plans for Special Areas of Conservation.
- Commit to the integration of ecosystem management goals in not only in economic sectors such as agriculture and forestry, but also finance, trade and broader development planning.

9 Sustainability of the Irish Agricultural Sector -Comhar Briefing Paper 2006 – David Styles and Craig Bullock



- Commit to the extension of the Rural Environmental Protection Scheme (REPS) to include positive habitat management/creation measures for more commercial farmers, integrated with Local Authority habitat management practices, e.g. hedgerow maintenance, and inclusion of more such measures within REPS.
- Commit to the completion of a National Inventory of Outstanding Landscapes, an update of the inventory last compiled by An Foras Forbatha in 1977.
- Commit to the preparation and implementation of a national Coastal Zone Management strategy – as a key priority to protect the assets of the sector and to meet many other objectives.
- Reiterate the commitment in the 2007 Programme for Government to the targets and implementation of measures in the National Strategy for Biodegradable Waste, which aim to divert 80% of biodegradable waste from landfill.

3.5 Public health

The promotion of public health is an essential goal for society. A poor-quality environment can pose a threat to public health, but more generally lifestyle-related and chronic diseases, particularly among socioeconomically disadvantaged groups and areas, undermine sustainable development. Comhar welcomes commitments in the Programme for Government to ensure that public water supplies be 100% compliant with drinking-water standards and for continued investment in wastewater schemes to ensure that discharges into our rivers, lakes and coastal water meet the highest international standards.

3.5.1 Recommendations

The revised NSDS should contain a commitment to allow every citizen to enjoy a healthy lifestyle. This ranges from protecting the right of people to live away from hazardous pollution in the air, water and food to encouraging more active lifestyles.

In the short term, the NSDS should contain the following steps:

- Food labelling should be improved to provide consumers with appropriate information on the provenance and nutritional value of food
- Ensure compliance with relevant standards, e.g. for drinking water
- Continue investment in the necessary infrastructure for water supply and wastewater treatment systems
- Land-use planning and transport planning at all levels of government should promote walking and cycling as well as a shift to public transport, to encourage a more active lifestyle and the reduction of air pollution.

3.6 Social inclusion demography and migration

An overall objective of sustainable development should be a socially inclusive society that is free from poverty and provides a minimum quality of life for residents. The National Action Plan for Social Inclusion 2007-2016 (NAPSI), which was published in February 2007, provides a new strategic framework for addressing poverty and social exclusion. It commits to reduce the number of those experiencing consistent poverty to between 2% and 4% by 2012 with the aim of eliminating consistent poverty by 2016. The plan identifies a number of high-level strategic goals in key priority areas – education, employment and participation, income supports for disadvantaged groups.

3.6.1 Recommendations

- The revised NSDS should reiterate the key commitments in the NAPSI but it should also include targets for reducing those at risk of poverty (also known as “relative poverty”) – defined as having an income below 60% of the median income threshold for society as a whole. The number of people at risk of poverty in Ireland fell from 21.9% in 2001 to 18.5 per cent in 2005, compared to 10-11% in the Netherlands, Germany and the Nordic countries. While the NAPSI pledges to eliminate consistent poverty by 2016, it does not set targets for reducing the number of people at risk of poverty.
- The NSDS should place additional emphasis on the problem of adult literacy beyond the NAPSI goal of reducing illiteracy among people of working age from the current 27%-30% to 10%-15% by 2016.
- There is a need to develop comprehensive, coherent and transparent policies on immigration and integration issues. Planning and development on the issues must be long term and take place in the context of other social, infrastructural and economic planning. Legal restraints, such as lack of access to permanency, non-recognition of qualifications, family reunification rules and restricted access to employment, can place barriers on integration and need to be recognised and overcome. In line with the Programme for Government and the recent appointment of a Minister of State for Integration, integration policy should be based on equality principles with a revised and broader view of social inclusion that builds on the experience of other countries. The development of integration policy should include consultation and the active involvement of minority-led groups.

3.7 Global Poverty and Sustainable Development Strategies

Ireland has traditionally played a leadership role in the fight against global poverty and supporting multilateral environmental agreements. The 2007 White Paper on Irish Aid commits Ireland to increasing its official development assistance to 0.7% of Gross National Income by 2012. The White Paper also calls for the “mainstreaming” of four priority issues into the work of Irish Aid.¹⁰ These four areas, gender equality, environmental sustainability, HIV/AIDS and governance, are fundamental to sustainable development and cut across and inform all of the work of Irish Aid. The White Paper outlines the particular relationship between poverty and environmental degradation in developing countries, which often feed into each other in a vicious circle.

10 Government of Ireland (2007), White Paper on Irish Aid, 15



Comhar welcomed Irish Aid's Environment Policy for Sustainable Development, launched in 2007, which reiterates the principle that sustainable development in the context of official development assistance is based on the economic, social and environmental pillars.

The language of sustainable development is widely used in relation to trade policy but is not being actively implemented. Trade agreements need to be focused on achieving this objective (of which poverty eradication is an integral part) and should respect the Rio Principles such as common but differentiated responsibility, the polluter pays principle and the precautionary principle. These principles should be core to Ireland's trade policy, which should aim at limiting environmental degradation as a result of trade policies and influence the EU position in international negotiations.

3.7.1 Recommendations

- The revised NSDS should reaffirm Ireland's commitment to the Millennium Development Goals and to the outcomes of the 2002 World Summit on Sustainable Development, and recognise the need for aid and trade policies to work in a complementary way. The NSDS could reiterate Ireland's commitment to raise its volume of aid to 0.7 of Ireland's gross national income by 2012 as well as full integration of sustainable development principles in the Irish Aid Programme, primarily through the implementation of the Environment Policy for Sustainable Development and Environment Mainstreaming.
- Irish Aid, working together with other donors, should assist developing countries to integrate sustainable development across their national development and poverty reduction plans including through support for the UNEP/UNDP Poverty Environment Initiative in Africa.
- Use of the Kyoto Protocol's Clean Development (CDM) Mechanism should be consistent with Irish Aid policy and should aim for the highest standards of environmental and social integrity. Any use of the CDM should not be with Irish Aid funding, however, as this would constitute a form of tied aid. Any CDM projects should be funded through other government channels (in Ireland's case this is via the Carbon Fund managed by the Treasury Management Agency) or the private sector. Moreover, due to low levels of capacity Ireland does not set up and manage JI and CDM projects itself but rather invests in funds that do this on our behalf (Ireland invests in several multilateral funds ¹¹) As a result, Ireland does not have control over the portion of CDM to JI projects supported or where these projects are located. At present there are few CDM projects being implemented in Africa – the majority are in China and other more developed developing nations. Africa is struggling to take up the opportunities presented by CDM due to the lack of an enabling environment and weak capacity. Therefore, Comhar SDC recommends that the Government investigate the possibility of a more targeted CDM policy that allows Ireland to invest in specific projects according to geographical location and minimum social and environmental standards.

11 <http://carbonfinance.org/Router.cfm?Page=Funds&ItemID=24670>

3.8 Spatial planning

Spatial planning covers land use, settlement patterns, the built environment and the provision of transport infrastructure, among other policy areas. Spatial planning is an essential part of sustainable development because it is a key determinant of the kind of economic development that Ireland will see as well as the extent to which that development enhances or undermines Ireland's environmental and social resources. According to the National Spatial Strategy, sustainable development in this context means maximising access to and encouraging use of public transport, cycling and walking; developing urban and rural communities and settlement patterns to reduce distance from employment and services; and minimising the consumption of non-renewable resources (e.g. soils, groundwater and agricultural land), among other priorities. This agenda faces serious challenges given the negative trends in Ireland's spatial development in recent decades. For example, Ireland's pattern of dispersed settlement is one of the underlying drivers of the increased use of private car in Ireland, the destruction of important habitats for biodiversity, and social problems like fragmented communities. Urban sprawl is itself a product of rapid growth in population and incomes, the search for affordable housing, the absence of affordable clusters of housing or sites available adjacent to schools, and public transport, and lifestyle preferences. Ireland has seen substantial green-field development far from urban areas without the development of associated transport systems to facilitate commuting to employment centres and associated social, health and education services.

These negative trends have worsened in part because of a lack of coordination between different relevant policy areas. Although the 2004 National Spatial Strategy provides an overarching policy framework, it does not seem to be aligned with other major policy initiatives such as *Transport 21*, the Government's spending programme for transport infrastructure, or decentralisation, the Government's policy of dispersing the staff of Government Departments and Agencies around the country. Ireland's current approach to transport and land-use planning is a combination of *laissez-faire* and "predict-and-provide", wherein roads are built in an attempt to alleviate current and anticipated congestion but without the appropriate land-use controls. This has allowed new roads to lead to increased urban sprawl and ever-increased demand for road-based motor transport.

Urban-generated housing in rural areas may bring benefits not to the local economy but rather to the urban economy of the nearest big town or city. Comhar SDC recognises that the provision of affordable rural housing is necessary to maintain and support rural communities but is concerned at the proliferation of one-off housing in the countryside, which we consider to be contrary to Comhar SDC's Principles of Sustainable Development.¹²

12 Comhar's recommendations DOEHLG on the Draft Guidelines on Sustainable Rural Housing, April 2004



3.8.1 Recommendations

- **Policy integration:** The revised NSDS should commit Ireland to the integration of planning and future transport systems, a fundamental requirement to arrest the negative trends associated with urban sprawl. The revised NSDS should call for an assessment of the National Spatial Strategy to determine the successes or limitations in its implementation to date and its ability to meet future key challenges of sustainable development.
- **Governance:** The revised NSDS should give full consideration to reforms of local government such as introducing local taxation. The planning system in Ireland suffers from the lack of local taxation, which would create a linkage between the costs and benefits of the services that local authorities provide. One important reform would be to allow local authorities to capture some of the increase in value of land that results from the provision of public infrastructure and services or the granting of planning permission.¹³
- **Public participation:** The participation of civil society in decision-making leads to greater awareness and eventually, changed behaviour. Such participation can itself pre-empt delays and prevent cost overruns if concerns expressed are taken into account at an early stage in the process. The revised NSDS should commit Ireland to the ratification of the Aarhus Convention (as foreseen in the Programme for Government) and the full transposition of related EU Directives, particularly on public participation and access to Justice.



13 Sections 48 and 49 of the 2000 Planning Act provide for the levying of development charges with the granting of planning permission. These development levies should take into account such increases in the market value added to land as a result of public policy. See "Comhar Recommendations for Small Village Development", based on a study by Emer O'Siochru (Feasta) and Billy Murphy (County Wexford Partnership), February 2004

4 Better policymaking, governance and crosscutting issues

The revised EUSDS sets out an approach for better policymaking based on better regulation and on the principle that sustainable development should be integrated into policy making at all levels. It advocates the use of tools for better policy-making including ex-post assessment of policy impacts and public and stakeholder participation. The EUSDS outlines a series of “Policy Guiding Principles” (in many cases these principles reflect Comhar SDC’s own *Principles for Sustainable Development*):¹⁴

- Promotion and protection of human rights
- Solidarity between generations
- Open and democratic society
- Involvement of citizens
- Business and social partners
- Policy coherence between local, regional, national global levels
- Policy integration
- Best available knowledge
- Precautionary principle
- Polluter pays.

The EUSDS also advocates the application of a number of economic ideas. These include:

- Cost-effectiveness
- Polluter pays – getting prices right – smart growth
- Infrastructure and congestion charging (transport) – new satellite technologies
- Green Public Procurement
- Stock and flow concepts in national income accounting
- Human, social and environmental capital
- Tax shift from labour to energy and resources
- Reduction of subsidies
- Emissions Trading.

The revised NSDS should likewise place special focus on the mechanisms for realising sustainable development.

14 Comhar SDC (2003), *Principles for Sustainable Development*, July 2003



4.1 The Irish context

4.1.1 Governance and sustainability: horizontal integration

Good environmental governance requires a combination of political leadership, effective mechanisms and public participation. The focus of the 1997 NSDS on integrating environment into the various policy sectors was an important step at the time as it provided a rebalancing of the previous neglect of the environment into many policy areas. A weakness of the 1997 NSDS was that it did not have many quantified objectives in the economic policy areas that undermine the environment nor clear indicators to measure progress. The Environmental Network of Government Departments was established to coordinate environmental integration and implementation of the NSDS commitments across all sectors. The network lapsed after a number of years but has now been re-established as the High Level Interdepartmental Group to steer the review of the NSDS in 2007.

Considerable resources were made available for the implementation of the NSDS measures through the National Development Plan (NDP) 2000-2006 and the programmes of the various government departments and agencies. At a more fundamental level, however, the 2000-2006 NDP did not fully reflect the NSDS. Several NSDS measures, particularly in relation to transport and energy, were overtaken by economic growth. Comhar SDC drew attention to the significance of monitoring and reporting of horizontal principles, especially the environment, rural development and social inclusion, during the mid-term review of the NDP and Operational Programmes in November 2003.¹⁵ This was reiterated in the Comhar SDC 2006 submission to the Department of Finance during the consultation on the preparation of the NDP 2007-2013.¹⁶

4.1.2 Governance and sustainability: vertical integration (Local Agenda 21)

The NSDS, together with the local government reform process (commenced in 1997), provided a platform for public participation and involvement at local level through both the process of Local Agenda 21 and new structures established under the local government reform process. Guidelines on Local Agenda 21 issued to local authorities in 2001 addressed the delivery of Local Agenda 21 by encouraging high levels of participation and partnership with the public generally and also with local enterprise and community groups. New structures established under local government reform offered the potential for a mutually reinforcing overall framework for local government and Local Agenda 21 through the operation of the County and City Development Boards and other structures.

The local government reform process, based on principles of inclusion, participation, thematic and area-based approaches, integration and value for money, derives largely from sustainable development principles. The transfer of the social partnership model to county level is compatible with sustainability principles. However, while progress has been made, local empowerment has not been fully realised, with

15 "The Mid-Term Evaluation of the National Development Plan (NDP) AND Community Support Framework (CSF) for Ireland, 2000 to 2006. Comhar Comments", Comhar SDC, November 2003

16 "Sustainability in the National Development Plan 2007-13. Recommendations from Comhar – the Sustainable Development Council (SDC)", 20 September 2006

some groups still excluded from decision-making processes despite the new structures and processes.¹⁷ This is particularly due to the lack of resources allocated to communities to participate, which effectively excludes some groups. More needs to be done to improve uptake and implementation, of Local Agenda 21.

The 1997 NSDS also identified a role for Regional Authorities in the delivery of the strategy at regional level in defining regional sustainability priorities, implementation mechanisms, and regional indicators. However, these objectives were not met. Comhar SDC considers this a missed opportunity as it would have better supported the regional implementation of the subsequently adopted National Spatial Strategy.

Comhar SDC welcomes the commitment in the Programme for Government to increase the resources available to Comhar and enhance its capacity undertake analysis of policy issues and policy performance.

4.2 Recommendations for policy integration

The revised NSDS should address the governance dimensions of sustainability and reiterate a general principle of support for macroeconomic and fiscal measures. The revised NSDS should:

- Focus on better policy making and policy integration. Sustainable development requires that government policies be formulated not in isolation but with regard to other policies and priorities. This is essential to avoid duplication of effort or even policies that are contradictory. Integration allows the synergies between policies to be realised, for instance by developing transport policy and land-use planning in tandem. The High Level Interdepartmental Group should continue to oversee the delivery of the revised NSDS after its adoption.
- Commit to the development and refinement of Impact Assessments for policies and programmes in order to assess in a balanced way the social, environmental and economic dimensions of sustainable development including costs of inaction, and ex post analysis. Existing Regulatory Impact Assessment methodologies should be reviewed in the light of best practice on sustainability impact assessments. Similarly, the Department of Finance *Guidelines for Appraisal and Management of Capital Expenditure Proposals in the Public Sector* should address the broader sustainability dimensions beyond value for money for the Exchequer.
- Be coherent with and complementary to existing and future policies and strategies across a range of areas, including *National Development Plan 2007-13 Transforming Ireland A Better Quality of Life for All*; *NESC Strategy 2006 – People Productivity Purpose*; *Implementation of the Climate Change Strategy Progress Report, 2006 and the revised National Climate Change Strategy, 2007*; *National Action Plan for Social Inclusion*; the revised *National Biodiversity Plan* (pending); *National Spatial Strategy, 2004*; rural development strategy; *Transport 21*; and others. The NSDS could identify major contradictions between existing strategies and suggest ways that they could be resolved. Sustainability impact assessments should be used to identify preferred policy options and trade-offs.

17 See *Towards a Green Isle — Local Sustainable Development on the Island of Ireland*, Centre for Cross Border Studies, 2004



- Put in place the necessary supports and mechanisms to provide for effective delivery of the strategy at local and regional level and alignment and complementarity with the National Spatial Strategy. Regional and local authorities should drive the implementation of regional and local sustainability. Local structures, such as city and county development boards, city and county partnerships, leader groups and local energy agencies, should be adequately resourced to deliver the local sustainability agenda in partnership with local communities.

4.3 Fiscal and macroeconomic measures

In the Irish context a major shift in our economic model will be necessary to realise sustainable development. For example, meeting the challenge of climate change will require fundamental change in the way we live and work. This is necessarily a transformative project, but it need not be disruptive, as long as the targets are set well in advance and strong and unambiguous signals are given to guide the individual actions of all members of society. The guiding principle is that environmentally or socially friendly activities should be rewarded, whereas environmentally or socially destructive activities should be made more costly.

Clear economic signals can often lead to a change in behaviour at less cost and with fewer rules than standard regulation. Economic and fiscal measures often allow more flexibility to businesses and individuals in deciding how to reduce their environmental impact, which also lowers costs. Fiscal and macroeconomic measures in Ireland include the recently launched EU Emissions Trading Scheme, which requires large electricity generators and industrial energy users to reduce their greenhouse-gas emissions or buy permits on a market. Similar trading schemes could be introduced to other sectors. The example of the plastic bag levy, which was introduced in 2002 and has led to an estimated 90% reduction in the number of plastic bags purchased in Ireland, shows the potential of even a small price signal to influence behaviour.¹⁸ Environmental tax reform provides many opportunities for improving the environment without damaging the economy: several EU member states have reduced taxes on labour while increasing them on pollution and energy consumption in a fiscally neutral way and without harming their overall economic competitiveness.

4.3.1 Recommendations for fiscal and macroeconomic measures

The NSDS should reiterate a general principle of support for macroeconomic and fiscal measures. Specific recommendations could be made with regard to:

- **Pricing:** Extension of the principle of “making the polluter pay”, through the use of price signals could, for example, encourage all users to pay for different kinds of infrastructure (e.g. roads, water, waste disposal) to reflect at least part of the environmental cost of their use. Pricing should be designed to encourage a less environmentally damaging behaviour, e.g. water conservation or car-pooling. Comhar acknowledges, however, that timing and targeting of such pricing mechanisms is an issue, e.g., availability of adequate public transport options in the case of congestions charges. Where mandatory charging is seen as politically impossible, voluntary charging could be introduced

18 <http://www.environ.ie/DOEI/DOEIPol.nsf/wvNavView/Plastic+Bags?OpenDocument>

on a pilot basis. Charging must be done in a socially equitable way, e.g. accompanied by rebates for those who cannot afford to pay.

- **Subsidies:** subsidies should serve a clearly defined set of environmental and social criteria. Environmentally damaging subsidies should be phased out. A range of direct and indirect subsidies including state aid and tax exemptions which incentivise greenhouse gas emissions.¹⁹
- **Smart economic growth:** economic growth should focus on the long term and pays greater attention to principles of sustainable development such as environmental stewardship, cost-effectiveness and efficiency. One example is the concept in urban planning and transportation of “smart growth”, which seeks to avoid urban sprawl and advocates compact, land use planned around public transport and mixed-use development that is friendly to pedestrians and cyclists as well as motorists and provides a mix of housing choice.
- **Green public procurement:** Public procurement accounts for a large share of national consumption. If the Government integrates principles of sustainable development into its purchasing decisions, this will at once create a market for sustainable products and help Government to align its operations with the principles of sustainable development. This provides a practical way for the Government to practice integration and thereby to lead by example. The revised NSDS should set clear guidance for the integration of sustainable-development criteria into all public procurement decisions, focusing initially on energy efficiency.
- **Competitiveness:** The use of fiscal and macroeconomic measures such as a carbon tax need not undermine Ireland’s international economic competitiveness, if appropriately designed. Nevertheless, Ireland could take a proactive role in negotiations with other international partners, especially other EU member states, in promoting a general EU-wide shift towards a system of taxation that supports sustainable development. Ireland should support efforts to promote tax harmonisation at EU level that support such a shift.

4.4 Communication, awareness and education for sustainable development

Public communication is vital in making sustainable development more accessible and better understood. The need for effective communication and awareness-raising was highlighted at each of the three Comhar SDC sponsored stakeholder consultation events on the review of the NSDS. Communicating effectively about sustainable lifestyles is a challenge. Expert analysis, such as that undertaken by UNEP recommends that communication style must be positive and tailored to different circumstances and cultural contexts.²⁰ Messages should not be patronising, guilt-laden or disapproving.

The revised EUSDS acknowledges that success in reversing unsustainable trends will to a large extent depend on high quality education for sustainable development (ESD) at all levels of education. The revised EUSDS encourages member states to develop national action plans for ESD in the implementation of the UNECE Strategy for ESD. Comhar SDC welcomes the commitment of the Department of Education and Science to coordinate the preparation of a national action plan for ESD in 2007.

19 Subsidies and Emissions of Greenhouse gases from Fossil Fuels – David Healy & Richard Douthwaite, 2005

20 Communicating Sustainability – How to produce effective public campaigns – UNEP/Futerra Communications, 2005



4.4.1 Recommendations for communications awareness and education for sustainable development

Comhar recommends that a specific communications and awareness campaign should be undertaken to support the implementation of the revised NSDS. The campaign should be and forward-looking and focus the positive lifestyle choices that are consistent with sustainable development.

Comhar SDC recommends that the revised NSDS should commit to the adoption of a national action plan for ESD within one year of the publication of the revised NSDS. Specific recommendations, informed by the Comhar-sponsored research, are:²¹

- The national action plan for ESD should be developed and implemented in consultation with all the relevant stakeholders; adequate funding should be made available to implement the national action plan in all areas.
- Open and effective consultation mechanisms should be used in the development and implementation of ESD at all levels. A national ESD platform could be established to assist in the development of partnerships and dialogue in Ireland; Comhar SDC is prepared to assist in this regard.
- ESD principles and approaches should be embedded in a crosscutting way in formal education curricula at all levels. Appropriate supports should be made available to integrate ESD into training of teachers and educators and into continuing professional development.

4.5 Research for sustainable development

The National Development Plan 2007-2013 foresees a large increase in research and development, with an overall investment of €8.2 billion foreseen under the NDP's Science, Technology and Innovation Programme. This funding is additional to that available to Irish researchers under the European Union's Seventh Framework Programme for research. Sustainable development policy depends on many forms of knowledge from different fields of research and disciplines and, crucially, linking different disciplines. The application of knowledge ranges from providing an evidence base upon which to build policy to providing insights from research about complex problems to policymakers. Research should cross different disciplines to link up the three pillars of sustainable development.

The revised NSDS could play a positive role in bringing together research efforts in Ireland:

- Government departments and agencies (e.g. Sustainable Energy Ireland, Environmental Protection Agency) already commission much research directly, but there may be a need to coordinate these ongoing research programmes to provide overall strategic direction²². A **research coordinating body** at the centre of Government could provide this overall direction, although care will be needed to ensure that this does not lead to another layer of bureaucracy.

²¹ Research Project on Education for sustainable Development in Ireland – Eco-Unesco April 2007

²² The EPA coordinates environmental research in Ireland, liaising with other bodies such as Marine Institute and SEI.

- Establish a programme of **Sustainable Development Research Fellows** in government departments that help integration of latest knowledge into departmental decision-making, and its links to the wider strategic challenges of the Agreed Programme and sustainable development. Numbers will depend on interest of relevant departments and support from relevant agencies. Comhar SDC is willing to act as facilitator of this network
- **Third- and fourth-level research councils:** The Higher Education Authority and the three Irish research councils – Irish Research Council for Science, Engineering and Technology, Irish Research Council for the Humanities and Social Sciences and the Irish Energy Research Council – already work together to encourage the development and training of postgraduate students and researchers in all areas of science, engineering, technology, arts and the humanities. This cooperation should be enhanced to promote further interdisciplinary research and training. Specifically, there is the need for the development of more university programmes that focus directly on sustainable development or are at least informed by the key challenges of sustainable development.
- **Sector-specific research programmes:** the revised NSDS should ensure that the research questions posed by sustainable-development policy are fully integrated into specific programmes like the Enterprise and Agri-Food research sub-programmes of the National Development Plan.



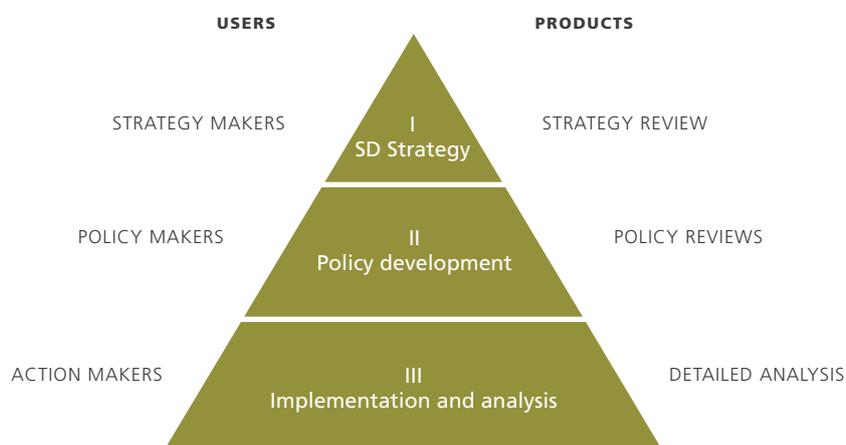


5 Monitoring, measuring and reporting sustainable development

The revised EUSDS provides a reporting framework for Member States on the implementation of the EUSDS. There is a commitment to develop indicators “at the appropriate level of detail” to ensure proper assessment of each particular challenge. There is a commitment to further develop and review indicators to increase their quality and comparability as well as their relevance.

In September 2001, the European Commission Statistical Programme Committee established a Task Force ‘to develop a common response from the European Statistical System to the need for indicators on Sustainable Development (SD)’. The Task Force organised the selected SDI using an indicator pyramid, which enabled the prioritisation of the use of the indicators according to their use, as set out below in Figure 1.

Figure 1. Indicator pyramid



5.1 The Irish context

Comhar SDC has commissioned research on sustainable development indicators²³ and concurs with the recommendation in the research report by EnviroCentre, *Counting What Counts*, that the ongoing work programme of EuroStat can inform Ireland’s review of the NSDS and development of an appropriate set of sustainable development indicators (SDI). It will be vital to develop the revised NSDS in tandem with the selection of the SDI set.

23 *Counting What Counts – A review of sustainable development indicators for Ireland* – Dr. Cathy Maguire & Dr. Robin Curry, EnviroCentre, 2007

This research highlighted the experience of EU member states to initially produce a very large SDI set, in some cases as many as several hundred indicators, and then reduce the number on the grounds of both relevance to the national situation and data availability. There has also been a move away from the three-pillar approach to a more integrated and holistic approach with the identification of sustainable-development themes and selection of SDIs that reflect these. This is reflected in the EU SDI set, which has ten themes.

Denmark, Sweden, Germany and the UK have all produced 'headline' datasets of 15-20 SDIs that are usually widely disseminated.

Towards 2016 commits the Government to examine the application of satellite accounts in the area of environmental sustainability and the NSDS should also look at complementary measures of *wellbeing* to GDP such as the United Nations' Human Development Index.

5.2 Recommendations for monitoring and measuring sustainable development

Comhar SDC considers that the indicator set contained in the final report of the EUSDI Task Force would be a useful starting point.²⁴ Data exist for many of these indicators. Not all the SDIs identified in the list will be relevant in the context of the revised NSDS as the themes have not yet been identified. However, the list can be used as a basis from which to prioritise indicators in relation to national goals using criteria such as robustness, practicality, usefulness to policy makers, integration and data availability and quality. Data are available for most of the relevant "best-available" indicators from the EUSDI set for Ireland. EnviroCentre reviewed statistics published by EuroStat and identified data gaps for Ireland (see Annex 1). It is also necessary to put in place the right framework for measuring indicators. The development of an integrated system of economic and environmental accounting is the foundation needed to measure Ireland's environmental performance now and in the future. The revised NSDS should commit Ireland to the development of an integrated system from the beginning as this will permit a consistent analysis of the contribution of the environment to the economy and the impact of the economy on the environment. Nations monitor their financial performance, trade and debt and in the same way Ireland needs to measure its physical and ecological performance and balance of trade through natural resource accounting.

Comhar SDC makes the following specific recommendations on SDIs:

- The NSDS should take an integrated and holistic approach to policy development with the identification of SD themes and the indicators set should reflect this.
- The SDI set should be developed in parallel with the NSDS enabling integration of the strategy and indicators and a public consultation period to be undertaken for both at the same time. Consideration should be given to the development of a web-discussion portal. In Germany this has been effective in getting input from the public and academia to the debate.

24 Final Report of the Task force on Sustainable Development Indicators – November 2005 <http://epp.eurostat.ec.europa.eu/portal/>



- A hierarchical approach to SDIs should be used enabling the SDI set to inform decision-making, benchmark and measure progress over time and measure the implementation of the strategy. The SDI set should contain three levels of indicators:
 - A core set of “headline indicators” which monitor top-level objectives and are accessible to decision makers and the general public (level 1 indicators).
 - A set of indicators that address the themes of the SDS and evaluate and monitor progress towards the headline policy objectives (level 2 indicators).
 - A set of indicators that correspond to the implementation of specific policy objectives identified in the SDS (level 3 indicators) and can be used for more detailed analysis.
- The SDI set should incorporate relevant SDIs which are already used by the EU to minimise duplication of effort by statistical agencies in collecting and analysing data and to enable methodological and data improvements being carried out by EuroStat and these to be incorporated into improving Ireland’s SDIs.
- It is equally important that the development of an indicator set is resourced and coordinated properly and the appropriate structures put in place to support this. The Central Statistics Office, National Statistics Board, EPA, SEI, ESRI and NESC should be resourced to carry out the development of SDIs, including development of regional indicators (where appropriate).
- The High Level Interdepartmental steering group on the NSDS should quickly identify and resource one Government agency or Department to take on a coordination role between data providers. The model currently being taken forward for reporting on the Kyoto Protocol could be considered.
- The headline indicator set should be published annually and disseminated widely.
- Comhar SDC is well placed to provide an independent assessment of the implementation of the NSDS through the level 2 and level 3 indicators and should be resourced to do so as it can play a key role in communication and engagement of a wide range of stakeholders.
- The revised NSDS should commit Ireland to providing the resources for the development of integrated environmental and economic accounting and the institutionalisation and prioritisation of material-flow accounting.

Annex 1 – Availability of data for EU SDI set²⁵

Theme 1 – Economic Development

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Growth rate of GDP per capita	Y
Investment	2	Total investment by institutional sector	Y
	3	Real GDP growth rate	Y
	3	GDP per capita in PPS	Y
	3	Regional breakdown of GDP per capita	Y
	3	Total consumption expenditure	Forecast since 2001
	3	Net national income	Y
	3	Inflation rate	Y
	3	Total net saving by institutional sector	N
Competitiveness	2	Labour productivity per hour worked	Y
	2	Real effective exchange rate	Y
	3	Unit labour cost growth, for total and industry	Y
	3	Life long learning: total	Y
	3	Turnover from innovation by economic sector	N
	3	Gross domestic R&D expenditure	Estimated and provisional data
	3	Total public expenditure on education	Y
Employment	2	Total employment rate	Y
	3	Total employment growth	Y
	3	Total employment rate by gender & by highest level of educational attained	Y
	3	Total unemployment rate by gender, age group & by highest level of educational attained	Y
	3	Regional breakdown of employment rate	Y

25 Counting What Counts A Review of Sustainable Development Indicators for Ireland – Dr. Cathy Maguire & Dr. Robin Curry 2007



Theme 2 – Poverty and Social Exclusion

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Total at-risk-of-poverty rate after social transfers	Y
Monetary poverty	2	Total at-persistent-risk-of-poverty rate	Y
	3	At-risk-of-poverty rate after social transfers by gender, age group, highest level of education attained and by household type	Not by education
	3	Relative at-risk-of-poverty gap	Y
	3	Inequality of income distribution (Income quintile share ratio)	Y
	3	<i>Poverty Mobility</i>	N
Access to labour markets	2	Total long-term unemployment rate	Y
	3	Gender pay gap in unadjusted form	Provisional data since 2003
	3	Total very long-term unemployment rate	Y
	3	People aged 0-59 living in jobless households, by age group	Y
	3	At-risk-of-poverty rate after social transfers by most frequent activity	Y
Other aspects of social exclusion	2	Early school leavers: total	Y
	3	Persons with low educational attainment by age group	Y
	3	<i>Adequacy of housing conditions</i>	N

Theme 3 – Ageing Society

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Current and projected old age dependency ratio	Y
Pensions Adequacy	2	<i>Projected theoretical replacement rate</i>	N
	2	Relative mean income ratio	For 2001 only
	3	At-risk-of-poverty rate after social transfers for persons aged 65 years and over	Y
Demographic change	2	Life expectancy at age 65 by gender	Y
	3	Total fertility rate	Y
	3	Net inwards migration by age group	Total only
Public finance stability	2	General government debt	Y
	3	Current and <i>projected</i> public pensions expenditure	Current only
	3	Total employment rate by age group	Y
	3	Average exit age from the labour market by gender	Y
	3	Current and <i>projected</i> public expenditure on care for the elderly	Current only

Theme 4 – Public Health

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Healthy life years at birth by gender	Estimated from 2002
Human health protection and lifestyles	2	Percentage of overweight people	Y
	2	Resistance to antibiotics	Y
	3	Healthy life years at age 65 by gender	Estimated from 2002
	3	Health care expenditure	Y
	3	Cancer incidence rate by gender and type	Y
	3	Suicide death rate by gender and age group	Y
	3	Percentage of present smokers by gender and age group	Y
	3	<i>Work with high levels of job stress</i>	N
	3	Total serious accidents at work	Data not compatible from 1998-2002
	Food safety and quality	2	<i>Deaths due to infectious food-bourne diseases</i>
2		Salmonellosis incidence rate	Y
3		<i>Dioxins and PCBs in food and feed</i>	N
3		<i>Heavy metals in fish and shellfish</i>	N
3		<i>Pesticides residues in food</i>	N
Chemicals management	2	<i>Index of apparent consumption of chemicals by toxicity class</i>	N
	2	Index of production of chemicals by toxicity class	N – could calculate from ProdCom
	3	<i>Population exposure to air pollution by particulate matters</i>	Y
	3	<i>Population exposure to air pollution by ozone</i>	N
	3	Proportion of population living in households considering that they suffer from noise and from pollution	Up to 2000
	3	<i>Monetary damage of air pollution</i>	N

Theme 5 –Climate change and energy

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Total Greenhouse Gas Emissions	Y
	2	GHG emissions by sector	Y
	3	CO ₂ intensity of energy consumption	Y
	3	CO ₂ removed by sinks	Y
	1	Gross inland energy consumption by fuel	Y (SEI)
	2	Energy intensity of the economy	Y



	2	Final energy consumption by sector	Y
	2	Gross electricity generation by fuel used in power stations	N
	3	Share of electricity from renewable energy to gross electricity generation by source	Y
	3	Combined heat and power generation	Y
	3	Energy intensity of manufacturing industry	N
	3	Consumption of biofuels	N
	3	<i>External costs of energy use</i>	N
	3	Energy tax revenue	N
	3	High-level radioactive waste and spent nuclear fuel awaiting permanent disposal	Y

Theme 6 – Production and Consumption Patterns

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	<i>Total Material Consumption</i>	N
	1	Domestic material consumption	To 2001
Eco-efficiency	2	Emissions of aggregated acidifying substances and ozone precursors by sector	N
	2	<i>Generation of waste by all economic activities and by households</i>	N
	2	Municipal waste collected	Y
	3	Components of DMC	N
	3	DMC by material	N
	3	Municipal waste treatment by type of treatment method	Y
	3	<i>Generation of hazardous waste by economic activity</i>	Y
Consumption patterns	2	Electricity consumption per dwelling	Y
	2	<i>Green public procurement</i>	N
	3	Household number and size	Y
	3	Meat consumption per capita	Y
	3	<i>Share of consumption of products with an EU or national eco-label</i>	N
Agriculture	2	Share of area under agri-environmental support	Y
	2	Livestock density index	Y
	3	Nitrogen surplus	Y
	3	Share of area occupied by organic farming	Y
	3	<i>Use of selected pesticides</i>	N
Corporate responsibility	3	<i>Share of production from enterprises with a sustainable management system</i>	N
	3	Enterprises with an environmental management system	Y
	3	<i>Ethical financing</i>	N
	3	Eco-label awards by country and product group	Y

Theme 7 – Management of Natural Resources

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	<i>Biodiversity Index</i>	N
	1	Population trends of farmland birds	Y
	1	Fish catches from stocks outside safe biological limits	N
	2	<i>Sufficiency of member states proposals for protected sites under the Habitats Directive</i>	N
	3	<i>Change in status of threatened and/or protected species</i>	N
	2	<i>Trends of spawning biomass of protected fish stocks</i>	N
	3	<i>Effective fishing capacity and quotas by specific fisheries</i>	N
	3	Size of fishing fleet	Y
	3	<i>Share of structural support to fisheries allocated to promote environmentally-friendly practises</i>	N
	2	Groundwater abstraction	N
	3	Population connected to waste water treatment services	Patchy data
	3	<i>Emissions of organic matters as biochemical oxygen demand to rivers</i>	N
	3	<i>Index of toxic chemical risk to the aquatic environment</i>	N
	2	<i>Land use changes by category</i>	N
	2	Built up areas	Y
	2	<i>Exceedance of critical loads of acidifying substances and nitrogen in environmentally sensitive areas</i>	N
	3	<i>Share of total land area at risk of soil erosion</i>	N
	3	<i>Share of total land area at risk of soil contamination</i>	N
	3	Forest trees damaged by defoliation	Y
	3	<i>Fragmentation of habitats due to transportation</i>	N

Theme 8 – Transport

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	<i>Vehicle-km index</i>	N
	1	Total energy consumption of transport	Y
Transport growth	2	Car share of inland passenger transport	Estimated only
	2	Road share of inland freight transport	Y
	3	Modal split of passenger transport	Y
	3	Modal split of freight transport	Y
	3	Volume of freight transport	Y
	3	Energy consumption by transport mode	Y
	3	<i>Access to public transport</i>	N
	2	<i>External costs of transport activities</i>	N
	3	<i>Freight transport prices by mode</i>	N
	3	<i>Investment of transport infrastructure by mode</i>	N



Social & environmental impact of transport	2	Emissions of air pollutants from transport activities	Ozone only
	2	GHG emissions from transport activities	Y
	3	People killed in road accidents <i>by road group</i>	To 2002
	3	Emissions of NOx from road vehicles	Y

Theme 9 – Good Governance

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Level of citizens confidence in EU institutions	n/a
Policy coherence	2	<i>Proportion of environmentally harmful subsidies</i>	N
	2	Number of infringement cases by policy area	By country
	2	<i>Administrative costs imposed by legislation</i>	N
	3	<i>Share of major proposals with impact assessment</i>	N
	3	Transposition of community law by policy area	n/a
Public participation	2	Voter turnout in national Parliamentary elections	Y
	2	<i>Responses to EU internet public consultations</i>	n/a
	3	Voter turnout in EU Parliamentary elections	Y
	3	E-government on-line availability	Y
	3	Total E-government usage by individuals	Y

Theme 10 – Global Partnership

SUB THEME	LEVEL	INDICATOR	IRELAND DATA
	1	Official development assistance	Y
Globalisation of trade	2	EU imports from developing countries, total and agricultural products	n/a
	2	Sales of selected fair-trade labelled products	n/a
	3	Total EU imports from developing countries by income group	n/a
	3	Total EU imports from developing countries by product group	n/a
Financing for SD	2	Bilateral ODA by category	n/a
	3	Total EU financing for development by type	n/a
	3	ODA and FDI to developing countries by income group and geographical area	n/a
	3	Share of untied ODA in total bilateral ODA commitments	Y
	3	ODA per capita in EU-15 donors and recipient countries	Y
Resource management	2	EU imports of materials from developing countries by group of products	n/a
	3	<i>Contribution to the Clean Development Mechanism</i>	N
	3	CO ₂ emissions per capita in the EU and developing countries	n/a

Many of the indicators unavailable for Ireland relate to the 'best-needed' indicators, however, there are significant data gaps relating to the themes of 'production and consumption patterns', 'management of natural resources', 'transport' and 'public health' where it relates to environmental factors.





Annex 2 – Recommendations on issues to be addressed in a national action plan on sustainable consumption and production

Comhar recommends that the revised NSDS should commit to the adoption, with the participation of stakeholders, of a national action plan for SCP within two years of publication of the revised NSDS.

The national action plan for SCP should address:

Prioritisation

- The case for prioritisation of sustainable consumption and production, in the domestic and international economy, with an examination of available evidence addressing the whole life cycle of goods, services and materials, including the socio-economic impacts both inside and outside Ireland. Also, the contribution of SCP to national priorities e.g. waste reduction, sustainable waste management, and climate change.
- Linking sustainable consumption to national consumer policy and activity, including the identification of a champion such as the new National Consumer Agency.
- International activity: engagement in the work of the Marrakech Task Forces on sustainable consumption and production e.g. tourism, construction, to ensure early adoption of best practice and ensure prospects for benchmarking of our performance with other EU Member States.

Greening Public Procurement

- Intensification and coordination of public sector green procurement capacity and training. A review of existing current Government initiatives on Greening Public Procurement and setting of new targets for Government Departments, Local Authorities and State Agencies; exploring synergies for public procurement, health promotion (schools and hospitals), and rural communities.
- Leadership by the public sector in stimulating sustainable consumption and production in the context of climate change and the creation of a low carbon economy; the Public Sector Energy Efficiency Programme; promotion of biomass, energy efficient street lighting, and the conversion of vehicle fleets to biofuel blends²⁶.
- An increase in levels of public procurement together with capacity building initiatives and staff training.
- Greater collaboration between the National Public Procurement Policy Unit and DEHLG to increase the level of GPP.

26 See revised National Climate Strategy 2007-2012

- Sustainability aspects to be a requirement for inclusion in the (mandatory) Corporate Procurement Plans that each public body must produce.
- Whole life costing to be implemented and training for this to be put in place.
- Government-approved targets for certain products.
- Auditing for sustainability to be part of the Comptroller and Auditor General's and of the Local Government Audit Service's remit.

Economic Competitiveness

- Strategic economic recommendations on improving resource productivity, linking business competitiveness with the embrace of environmental technologies and other initiatives, and decoupling economic growth and environmental degradation.
- Improvement in consumer and business awareness of environmental claims, including specific information and awareness campaigns for Irish consumers on environmental claims and labels.

Clean Technology, Innovation, Competitiveness

- A review of the implementation of the ETAP Roadmap, coordination mechanisms and resources committed to research, development and roll out, to be conducted immediately after the launch of the European Action Plan (2007) on Sustainable Consumption and Production. Enhanced cooperation with business and industry representative organisations (e.g. IBEC, ISME etc.).
- Effective integration of ETAP activities into national strategies for innovation, technology development, competitiveness and R&D.
- A review of Environmental Technologies market/financing opportunities at home and overseas e.g. links to opportunities to be pursued under the UNFCCC Clean Development Mechanism.
- Measures to promote improved production and services, including the agri-food sector, that reduce the environmental impacts from the use of energy, resource or hazardous substances; and cleaner more efficient production processes that strengthen competitiveness and shifts in consumption towards goods and services with lower impacts.
- Greening private sector procurement and take up of environmental management systems, notably in the SME sector.
- The factors driving business to take up measures consistent with sustainable consumption and production and identification of additional measures e.g. product re-design, localization, lean manufacturing, clean production, Corporate Social Responsibility, and labelling of products and services.

Information & Awareness

- A review of supports for household and consumer/citizen action in support of SCP Communications, Citizenship and Culture and additional measures required to enhance effective communication and stakeholder participation in sustainable consumption and production.



- The development of an environmental product information strategy. Gaps in non-statutory control, namely section 11 of the ASAI Code of Advertising Standards which specifically excludes on-pack environmental claims, while an EU guidance document on making and assessing environmental claims appears not to be promoted or in use in Ireland.
- Consumer awareness and education in the form of clear and credible environmental information on products and services, and labelling. Attention should be given to the control and regulation of environmental claims.
- Measures to support individual and household decisions to re-articulate the link between consumption and quality of life (e.g. use of the private motor car versus less commuting distance/time).

Delivery

- Leadership and responsibility for sustainable consumption and environmental claims policy within one Government department or agency. The fragmentation of consumer production, sustainable consumption and environmental claims across various Government departments and agencies; and the need to organise overall responsibility and policy initiatives, notably in the area of environmental claims.
- A role for the National Consumer Agency in, inter alia, promoting reliable environmental labelling and information & public education; and a role in monitoring the incidence of complaints regarding misleading environmental claims; ensuring that self-declared factual and qualitative environmental claims meet minimum standards for good environmental claims.
- Development and recommendations by sector (e.g. energy, food, water, mobility, construction etc.), timelines for action (e.g. short-, medium-, and long-term), implementing agencies/delivery mechanisms and opportunities (e.g. enhanced cross-border energy/economic cooperation).
- A review of the adequacy of existing consumer Acts in dealing with certain types of environmental claims.

Measuring Progress

- In the context of sustainable development in general, and sustainable consumption and production in particular, the CSO should engage with the OECD and related research in exploring the practical application of research into the limitations of GDP as a measure of human welfare, and offer alternative or complementary indicators.
- In the context of its work on *'Measuring Ireland's Progress'*, a programme of work – in cooperation with other SD stakeholders who take an interest in the economics of sustainable development (e.g. Comhar, Feasta, New Economics Foundation), and working closely with the OECD, to explore complementary measures of human welfare in Ireland, commencing with attempts to address the following questions:
 - What can economic measures such as GDP do best and where other measures of wellbeing needed?

- Which other issues (e.g. ecosystems and their goods and services; social and human capital) need to be taken into account for a more complete account of human wellbeing?
- What measures could influence decision-making as useful and viable complements to GDP? (For example, Ecological Footprinting²⁷, the Human Development Index, Happy Planet Index, and the Genuine Savings Approach could be examined)?
- What would the implications be of a GDP measure corrected for loss of ecological or human capital?

Short-term steps

- The revised NSDS should set clear guidance for the integration of sustainable development criteria into all public procurement decisions, focusing initially on energy efficiency. Time-bound targets should be established for government departments, semi-state agencies and local authorities.





Annex 3: Findings from Comhar stakeholder events on the NSDS

[to be inserted]









Comhar

Sustainable Development Council

17 St. Andrew Street,
Dublin 2,
Ireland.

Email: comhar@environ.ie

Tel: 00 3531 888 3990
Fax: 00 3531 888 3999

