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## **Sustaining Sustainability**

a benchmark study on national strategies towards  
sustainable development and the impact of councils  
in nine EU member states



**EEAC**  
the network of  
European Environment and  
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Advisory Councils

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## 5 Ireland

RELATIVELY EARLY SDS WITH FOCUS ON ENVIRONMENTAL INTEGRATION, CONTINUED IN UPDATE 2002 AS ENVIRONMENTAL PROBLEMS REMAIN CHALLENGING (IMPACTS OF THE “CELTIC TIGER”)

- Ireland prepared a SD strategy relatively early (1997) with a focus on environmental integration, which was continued in the 2002 update document: the environmental impacts of the strong economic growth of the 1990s need ongoing emphasis.
- The architecture of the SDS is not fully clear and partly appears as a compilation of ongoing policies. Quantitative objectives are largely missing, as is a review mechanism.
- The current lead of the Ministry of Environment is mainly not questioned, due to the environmental focus, but commitment of some key Ministries remains limited.
- Linking to the (regional and) local level does not function well, and reveals some difficulties and deficits in the (spatial, development, local) planning system. Recent reform of local government structures has facilitated some progress in advancing local sustainability but a stronger emphasis on integrated thinking and enhanced public participation will be required to underpin and sustain progress.
- The EU SDS is referred to, but not systematically linked; instead the 6th EAP was used for structuring the 2002 update. Targets at EU level would be useful for Ireland.
- With a corporatist background of the country, wider stakeholder consultation has become more common over time, and is also reflected in the establishment of the SD council. But SD principles are not yet embedded in some key policy areas (e.g budget and transport), which do not see such a broader consultation.
- The SD council is considered a good mechanism, and welcomed as a driver for SD policies.



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ABBREVIATIONS

<i>PM</i>	<i>Prime Minister (the position of Head of Government is called Prime Minister, in Gaelic "Taoiseach")</i>
<i>Ministries</i>	<i>In Ireland all Ministries are called "Departments"; in this chapter the more common term "Ministry" is used, unless otherwise specified.</i>
<i>MinE</i>	<i>In Ireland it is the Department (Ministry) of the Environment, Heritage and Local Governments (DOEHLG).</i>

## A Actors and Process

### 1 GOVERNMENT: SDS PROCESS, GOVERNMENT COORDINATION AND REVIEW

#### 1.1 SD STRATEGIES' DEVELOPMENT

##### *Phase of Environmental Policy*

- 1990 Environmental Action Program, followed by numerous environmental strategies and legislation
- 1993 Creation of the Environmental Protection Agency  
Green 2000 Advisory Group<sup>1</sup> stresses the relationship between environmental protection and economic and social development
- 1994 National Development Plan 1994 – 1999 (includes commitments for investments in water and waste water services)
- 1995 Review of recent environmental policy and developments (“Moving towards Sustainability”<sup>2</sup>) by the Ministry of Environment and Local Government - a preparation document for the SDS, which has also seen some consultation.

##### *SDS development*

##### *1994 Change of government*

- April 1997 Adoption of the national SDS, followed by several sectoral policies, strategies and measures as outlined in the SDS
- later in 1997 Elections
- 1999 Comhar – the National Sustainable Development Partnership (SD council) established
- 1999 National Development Plan 2000 – 2006 (boosting investment in infrastructure, including environment related)  
Guidelines on “eco-auditing” on plans and programmes (MinE)  
“Ireland’s Environment – A Millennium Report” (EPA)
- 2001 Revised guidelines on Local Agenda 21 (“Towards Sustainable Local Communities”) by Ministry of Environment and Local Government
- 2002 Progress report and update of the SDS “Making Ireland’s Development Sustainable”, as Irish contribution to the WSSD  
National Spatial Strategy (MinE)
- 2004 Kinsale Conference “Challenges and Opportunities for SD in an enlarged EU”<sup>3</sup> as part of Irish EU Presidency programme

##### *Assessment:*

Preparing the SD strategy in 1997 was largely triggered by the need for a national response to Agenda 21 and national preparations in the run-up to Rio+5. Also, a new centre-left coalition government came into office in 1994

<sup>1</sup> A stakeholder group, since long disbanded.

<sup>2</sup> Key findings in DOELG, 2002, p. 33.

<sup>3</sup> [www.comharconference2004.ie](http://www.comharconference2004.ie)

and committed itself in the government program to prepare a SD strategy.<sup>4</sup> Largely because of a historical lack of heavy industry, Ireland maintained a relatively pristine environment until well into the 20th century. However, environmental quality has deteriorated over the last 25 to 30 years, and continues to face pressure under the impact of strong economic growth and changing population and settlement patterns. While progress has been made in decoupling energy and materials intensity from economic growth, and in reducing emissions from industry, absolute pressures on the environment have continued to increase. Despite a buoyant economy, and relatively low levels of unemployment, there is still significant poverty. Levels of homelessness, social exclusion and inequality are also increasing, notwithstanding the high levels of economic growth.

Hence the 1997 SDS is primarily focused on policy areas that affect the environment; this provided a rebalancing of the previous situation where environment was not generally integrated into national policy. Many economic and social policy elements, as well as socio-economic stakeholder fora (cf. ch. A.2 below), were already in place prior to the strategy and have been further developed in parallel. The strategy's focus on integrating environment into the various policy sectors was very important, giving a new priority to environment.

Ireland has seen rapid changes during the 1990s in many respects, mainly associated with the nature and extent of economic growth (the "Celtic tiger"). The implications of these developments for the natural resource base (actual or potential) had not become fully evident in 1997, and hence the 2002 update focuses primarily on the environment–economy link, with emphasis inter alia on eco-efficiency, recent developments in social policies, promoting greater participation in, and ownership of, SD on the part of stakeholders, including as part of Local Agenda 21.<sup>5</sup>

The (still) relative focus on environmental integration is seen as necessary, given the state of environment in the country. The 1997 SDS gave the framework for more strategic environmental policy, which still faced cleaning-up challenges and prevention of further pollution. The latter, and particularly the impact of the "Celtic tiger", was first underestimated, and hence the 2002 update was meant to tackle this. With slowing down of the economic boom around 2001, a greater emphasis on issues like competitiveness has now become more evident.

It is however a weakness of the SDS and the update document 2002 that both do not have many quantified objectives in sectoral policy areas that have negative impacts on the environment (cf. ch. A.1.3). It might also be in some ways impractical that the 1997 SDS remains in place: for the user it is difficult to identify what exactly remains in place, as the 2002 document is more than a progress report because it partly sets new priorities (cf. ch. A.1.3).

The 1997 SDS is also criticised for lack of a vision that brings together the strategy and other policies<sup>6</sup>. This was improved with the update 2002: By

<sup>4</sup> Mullally, 2004, p. 6.

<sup>5</sup> DOELG, 2002, p. 7.

<sup>6</sup> Comhar, 2001.

then the National Climate Change Strategy had been adopted as had the National Anti-Poverty Strategy, National Biodiversity and National Heritage Plans; and the adoption of the National Spatial Strategy was pending; all were cross-referenced under this over-arching framework of the SDS. Putting environment policies in the wider framework of SD altogether is still more in the starting phase. Environmental policy and integration seems to be taken seriously, as numerous activities (strategies, legislation, investments) indicate. Although considerable resources for the implementation of the Strategy measures have been made available through the National Development Plan 2000-2006 and the programmes of the various government departments and agencies, at a more fundamental level the National Development Plan (NDP) does not fully reflect the SDS. As a result, there is a need to reinforce the Strategy objectives and measures and ensure that they are more closely adhered to in the implementation of the NDP. Several Strategy measures, particularly in relation to transport and energy, have been overtaken by economic growth. A fully implemented Sustainable Development Strategy, at the centre of national policy, would ensure that sustainability was not compromised by such pressures. Meanwhile the mid-term review of the operational programmes under the NDP identified the need for more systematic sustainability appraisals, e.g. in the transport sector, and also some horizontal issues are partly being addressed in the monitoring and implementation of these operational programmes. The political commitments of successive governments since 1994 have contributed significantly to the preparation and implementation of the SDS and, overall, changes in government coalitions (1997, 2002) seem not to have had an unduly negative influence on the SD processes in the political context.

## 1.2 LEAD RESPONSIBILITY AND HORIZONTAL COORDINATION MECHANISMS

The 1997 SDS was prepared under the direction of a cabinet committee, chaired by the Ministry of Environment and Local Government, which also has the lead responsibility, and was adopted by the cabinet. The 2002 update was prepared by the MinE. Institutional mechanisms established to advance the legislative framework which support the SDS include an “environmental network of government departments”, in which the environmental units of the relevant Ministries participate<sup>7</sup>, as well as the parliamentary sub-committee on sustainable development<sup>8</sup>.

The lead responsibility of the MinE is mainly not questioned (yet), which in large part goes back to the predominant environmental focus of the strategy, though the Ministry of Environment reflects on the appropriate lead, particularly when the definition of SD becomes more overarching. It is appreciated that previously not included Ministries like the one for education are now also part of the “environment network”. Because of the small country (and

7 Comprising the following Departments: Environment and Local Government, Taoiseach's (Prime Minister's Office), Finance, Agriculture, Enterprise, Trade and Employment, Communications, Marine and Natural Resources, Transport, Education at the senior level (#Directors of Policy Units).

8 Retitled the Joint Committee on Environment and Local Government after the 2002 General Election (cf. ch. A.1.3.2).

administration), the government departments are relatively ‘close’ to each other, and there are many inter-departmental committees across all sectors. It was also assessed as positive for integration that the environment portfolio used to be combined with the Ministry of Transport until Ministries were reorganised following the 2002 General Election.

On the other hand difficulties within Ministries are identified, such as deficient links between the environment policy division and the planning division within the MinE.

A lead from the PM office is partly seen as critical for moving the process forward. The PM office so far has become involved in some work on social and environment indicators, and it participates in the “social partnerships” (cf. ch. A.2 below).

*Assessment:*

Involving other Ministries, and getting them committed to the SD agenda, will most likely remain a challenge not easy to meet in the current structure. Particularly in the situation that the Prime Minister (Taoiseach) has its own ‘Ministry’, which plays a key role in driving Irish policy-making across many fields and the PM having a strong position<sup>9</sup>, could make it plausible if this “Department of the Taoiseach” took the lead for SD policies. The other key player is the Ministry of Finance, which covers much of financial and economic policies and for the National Development Plan. On the other hand government decisions are made by the cabinet only, which is typically positive for cross-cutting demands.

Launched as a management initiative by the PM, each government department is required to prepare its own “statement of strategy”, covering policy issues, which was supposedly followed by all. The impact of these strategies is though questionable. The MinE is currently working on its new strategy for beyond 2005.<sup>10</sup>

### 1.3 MONITORING, REGULAR REVIEWING AND LONG-TERM PERSPECTIVE

The 1st SDS adopted in 1997 had no fixed term, but was updated as a contribution for the WSSD. This 2002 document was meant to be a progress report and an overall update (partly reviewing priorities), seeking to build on the strategy, by “placing it more fully in the context of environmental challenges associated with the stage of economic development which Ireland has now reached...”<sup>11</sup>.

The 1997 strategy remains in place as the “pre-eminent statement of SD policies in Ireland”<sup>12</sup>. There is no systematic monitoring process foreseen. Whilst the former might have some benefits for the long-term perspective (cf. below), the latter is rather deficient. At least from a practical point of view it is unfortunate that the 2002 update did not lead to a revised, and hence 2nd SDS, which from then on could be referred to. As things stand, it remains

<sup>9</sup> Elvert, 2003, p. 272.

<sup>10</sup> *The previous was in place for 2001 – 2004 (DOELG, 2001).*

<sup>11</sup> DOELG, 2002, p. 7.

<sup>12</sup> DOELG, 2002, p. 90.

unclear what stays in place, and what is new after 2002.

Switching from the sectoral approach in 1997 to one with priorities and objectives is probably favourable, but falls short in clarity and cross-reference (cf. B).

Besides the above mentioned coordination mechanism, and the role that the SD council (Comhar, cf. ch. A.3) and the parliamentary sub-committee on environment and local government (cf. ch. A.1.3.2 below) play in monitoring, there is no specific and/or cross-sectoral monitoring unit within government.

### 1.3.1 Indicators, targets and timetables

It is stated that the 1997 SDS focuses more on actions, without setting targets. For the 2002 update some indicators were used to measure progress in certain priority fields (the ones of the EU 6th EAP where chosen). They had not been fixed in the 1997 strategy, but were chosen by the MinE on the basis of most appropriateness.

As the SDS does not have a systematic monitoring system, there are no general timetables. Strategies and policies developed in the framework of the SDS<sup>13</sup> typically have qualitative objectives, but rather few national quantitative targets (some in social policy, some for waste, one for water metering by 2006<sup>14</sup>). These targets are set and monitored by the respective Ministries, which is not documented in the SDS (update document). In relevant policy fields the SDS (here: the 2002 update document) refers to EU or international targets<sup>15</sup>.

The lack of quantitative targets is criticised as a deficiency of the 1997 SDS and the 2002 update. Setting national targets is considered as rather difficult, and EU targets in place make it easier to secure acceptance at a national level, which also would apply to an EU SDS with targets and timetables (even if not legally binding).

### 1.3.2 Review terms, long-term perspective and role of the Parliament

As elsewhere it is also stated in Ireland that a long-term perspective is difficult to achieve, because not only politicians strongly tend to remain bound to the short-term, but also civil servants tend to be caught in day-to-day business.

The structural situation though might be relatively favourable, as there have been typically coalition governments, and also minority governments, since the 1980s with one party always being the largest fraction.<sup>16</sup> On the other hand the election system causes politicians to be strongly bound to the local level<sup>17</sup> and hence fosters a certain clientele attitude<sup>18</sup>, which hampers a long-term orientation and affects inter alia attempts for improving housing and planning guidelines (cf. ch. A.1.4 and D.2).

13 or in reality independent from it, but referred to in the 2002 update document

14 DOELG, 2002, p. 92 – 97.

15 Kyoto Protocol, Phosphorous Regulation, EU National Emissions Ceilings Directive.

16 Elvert, 2003, p. 267 and 271.

17 E.g. national politicians hold 'clinics' (office hours) in their local areas.

18 Elvert, 2003, p. 287/288.

There used to be a Joint Parliamentary Sub-committee on SD (a standing committee)<sup>19</sup>, which dealt with the SDS 1997. This sub-committee was not re-established following the 2002 General Election, but was succeeded by a Joint Committee on Environment and Local Government, which in 2002 agreed the “Government’s Review, Assessment and Future Action” in the run up to Johannesburg. The reasons for this change are not fully clear. The first committee seemed to have a more overarching ambition, but in reality dealt mainly with environment policies (given the focus of the SDS). With this situation and the responsibility of the MinE for the SDS the Parliament apparently ‘re-sectoralized’ SD policies.

Long-term objectives are not in place, as setting targets is considered in general as difficult. As the SDS does not have a ‘term’, there are no conflicts with government terms. The relation of the SDS and government programs or coalition agreements does not seem to play a role (yet), as the SDS has not yet reached an overarching character.

### 1.3.3 Approach for a SD strategy

There are no signs of a too rigid “planning” approach in Ireland, maybe even the opposite applies: In classical planning domains like land use planning the notion of “freedom” still dominates the need for a more regulative or stricter planning approach, which causes problems regarding SD objectives (cf. ch. A.1.4 and D.2). Overall, for the country it is stated that a regulatory approach does not work well, due to historical roots.<sup>20</sup> Also the lack of a systematic monitoring system, and only few quantitative targets in place, suggests that the approach is rather too loose. Existing targets and their monitoring should be reflected in one single document (the SDS (progress report) for example). The priority fields are not yet structured with a convincing architecture, though this exercise is a bit easier in the case of a strong environment focus.

## 1.4 VERTICAL COORDINATION: LINK TO THE REGIONAL AND LOCAL LEVEL

The sub-national level of Ireland is made up of 29 County Councils and five City Councils (elected councillors) operating under the coordination and supervision of the Department of the Environment (since 2003: the Department of the Environment, Heritage and Local Government). In 1994 eight regional administrations were established, covering in each case several counties, which was mainly driven by EU Structural Funds Regulations. They do not have any executive responsibility, but their principal mandate is to promote the co-ordination of public services at the regional level.<sup>21</sup>

In general Ireland is characterised as being rather centralised. Local authorities though have an independent power with the competence to adopt local

19 “Joint” meaning that the committee is ‘cross-party’ with members from the Upper and Lower House (i.e. “Dail” and “Seanad”).

20 Having been under English rule for long limes has caused opposition to authorities. Also, the attachment to (own) land is very strong. As key issue it is stated how to balance the constitutional “right to private property” with “the common good”.

21 Mullaly, 2004, p. 4.

development plans, and there is no regular system of checks or approval by a higher level, which has caused problems of implementing national (planning) strategies and its SD elements. Some corruption scandals in planning in recent years, though being a much wider societal and governance issue, partly reveal this problem.

The 1997 SDS already said that there should be further streamlining of the planning system, and the “introduction of accelerated planning procedures for major projects involving significant employment and added value”<sup>22</sup>.

This finally took place with the Planning Act of 2000, which consolidated previous legislation and introduced “proper planning and sustainable development” as well as Strategic Environmental Assessment for all plans on country, regional and local level; these are regarded as positive developments.

The National Spatial Strategy of 2002 is criticised though for lack of consistency with the SDS, for example with identifying too many growth centres, a lack of priority for public transport, and ambiguity on one-off rural housing; and overall for not being based on the principles of SD (cf. lacking links within the MinE, ch. A.1.2). One of the greatest concerns, reflected in much divisive public debate and comment, is the issue of new housing in the countryside. “Sustainable Rural Housing” Guidelines were published in draft format in early 2004 and have received some public criticism for a perceived relaxation of planning controls for housing in the countryside.

For some time environmental/nature NGOs<sup>23</sup> have opposed new building developments in the countryside (“urban generated one-off housing”). They have been accused of having an ‘urban’ view only, “not understanding the concerns of those who make their living in the countryside”. There are significant challenges to be addressed in the implementation of a more sustainable policy on rural housing, not only in the physical planning context, e.g. design, sites and location, but also the broader socio-economic concerns such as rural depopulation, land affordability, land tenure, accessibility and infrastructure provision.

Overall, there is a certain hierarchy in the planning system, with the National Development Plan (NDP: infrastructure, investment for sectors, prepared by the Ministry of Finance), broken down to the local level through “Community Support Frameworks (CSF)”. For spatial planning there is the National Spatial Strategy (NSS, prepared by the MinE), Regional Planning Guidelines (currently under consultation) are meant to reflect national legislation and principles, and local planning authorities having had a statutory responsibility to prepare and review City and County Development Plans<sup>24</sup> (since the 1960s). The NSS and Regional Planning Guidelines provide the framework for current and future Development Plans. Both the regional guidelines and the city and county development plans (and local area plans sub-ordinate to them) though are approved by local authorities at the county or regional

<sup>22</sup> *Government of Ireland, 1997, p. 12.*

<sup>23</sup> *primarily led by An Taisce the oldest environmental and conservation NGO in Ireland*

<sup>24</sup> *Smaller urban authorities; Town Councils also prepare development plans – for the most part prepared by the relevant County Council on their behalf.*

level, i.e. in this case by the *elected* local representatives, who have quite possibly certain local interests. The MinE may intervene in relation to adoption or review of development plans but these powers have been rarely exercised. Local planning authorities (i.e. the executive public service) also exercise a development control function, because they decide on applications for planning permission. In addition to this system, following a process of local government reform, in 2000 County Development Boards were established ('partnership approach', i.e. a councillors and stakeholder composition) and required to produce 10-year strategies for the economic and social development for the county. As local government reform is apparently still ongoing there is no coordination yet with the City and County Development Plans and their Boards and the planning authority of a county.<sup>25</sup> But the MinE issued guidelines (to be reviewed in 2005), and studies have been commissioned, inter alia on the operation of the Boards.

In the 1997 SDS the government requests all local authorities to complete a Local Agenda 21 (LA 21) for their areas by 1998<sup>26</sup>. An Environmental Partnership Fund was established by the MinE to support the implementation of the SDS at local level, which has enabled a wide range of on-the-ground projects to be undertaken by local authorities and NGOs in partnership at local level, with or without a LA 21 approach.<sup>27</sup> Nevertheless, specific implementation of the strategy at local authority level was first poorly resourced, and formal adoption of the LA21 process has been considerably delayed by the ongoing process of local government reform.<sup>28</sup> Revised LA 21 guidelines, issued by MinE in 2001, pointed to new opportunities to underpin LA 21 processes within the new institutional structures, e.g. County and City Development Boards and Strategic Policy Committees, and while there has been progress in some areas, problems of fragmentation in others, and disparate patterns of public participation persist.

## 2 NON-GOVERNMENTAL ACTORS

Ireland is characterised by a basically corporatist structure, and at the same time 'alternative' forms of non-governmental organisations have not yet played a relevant role in policy-making, though this has started to change in recent years.<sup>29</sup>

The MinE supports environmental NGOs, which are still relatively weak, underdeveloped and low in membership. The 1997 SDS emphasises the need for a partnership approach between government, socio-economic partners and NGOs, both on national and local level, as an underlying paradigm.<sup>30</sup>

Both the employers' federation (and bodies that represent SMEs) and trade unions have been influential players with strong lobbying lines into govern-

25 *On local sustainability and planning cf.: Centre of Cross Border Studies (2004): Towards a Green Isle Local Sustainable Development in the Island of Ireland, published June 2004. www.crossborder.ie.*

26 *Government of Ireland, 1997, p. 197.*

27 *Comhar, 2001, p. 5.*

28 *Comhar, 2001, p. 5 and 8.*

29 *Elvert, 2003, p. 281 and 288.*

30 *Government of Ireland, 1997.*

ment. There are institutionalised mechanisms like the National Partnership Committee, succeeding the National Wage Agreement of the 1980s, which is a social partnership of business, trade unions, government and other stakeholder groups, both negotiating on wages for the private and public sector and for about the past 10 years also dealing with social and economic policies. The PM office participates in this partnership, which hence acts at the highest level.

Another institutionalised stakeholder body is the National Economic and Social Council (established 1973), which prepares reports that form the framework for negotiation of the national agreements.<sup>31</sup> It has no environmental membership, but has been involved in work on an approach to national progress indicators for sustainable economic, social and environmental development. A third body, also without members from the environment side, is the National Economic and Social Forum (established 1993), which is meant to reach “wider national consensus” on social policy initiatives with a special focus on unemployment.<sup>32</sup>

Farmers’ associations and the catholic church are also traditionally influential, though the role of the latter has decreased during recent years.<sup>33</sup>

The relatively strong stakeholder approach in Ireland is for example also reflected at the local level with County Development Boards composed of local councillors and stakeholder groups as an attempt to achieve a consensus view for the long-term development of a county.

## 2.1 CORPORATE SOCIAL RESPONSIBILITY (CSR)

Increasingly, companies in Ireland are reporting on Corporate Social Responsibility. A specialist organisation has recently been established in Dublin that supports companies to integrate socially responsible business practices into the mainstream of their business practice. *Business in the Community - Ireland* is a non-profit organisation and its services to business include CSR Policy & Practice Development, Employer Supported Volunteering and Educational Partnerships. *Business in the Community* is so far supported by 21 major companies who are committed to driving forward the movement of corporate social responsibility in Ireland.<sup>34</sup>

These initiatives, and the approach to CSR in general, are more focused on social aspects and not necessarily identified as an SD initiative, although many of the companies would also have environmental instruments like ISO 14001 in place.

## 2.2 STAKEHOLDER CONSULTATION

Wider consultation with interest groups has increased for many government strategies, and was further developed for the consultation process that was

<sup>31</sup> [www.nesc.ie](http://www.nesc.ie)

<sup>32</sup> [www.nesf.ie](http://www.nesf.ie)

<sup>33</sup> Elvert, 2003, p. 284 – 287.

<sup>34</sup> To date, the Founder Members of the organisation are: Aer Rianta, Allied Irish Bank, Anglo Irish Bank, An Post, Bank of Ireland, Cantrell & Cochrane Group, Cap Gemini Ernst & Young, Coillte, Eagle Star Life Assurance of Ireland, Eircom, Ericsson, Esat, ESB, Green Isle Foods, Guinness, IBM, Johnson & Johnson, KPMG, Marks & Spencer, Penneys & Tesco Ireland. (NB: This initiative looks similar to “Econsense” in Germany).

undertaken in the preparation of the SD strategy. A major consultative process was involved in determining the structure and terms of reference of the SD council Comhar (cf. ch. A.3 below). However, broader participation and consultation is still deficient in some major policy areas. For example, despite the implications of the National Development Plan for sustainable development, the SD council was not consulted on its preparation.

The form of the consultation process for the SDS (and update) is not criticised: a national conference had been organised prior to the adoption of SDS in 1997, and interested parties were invited to attend and contribute. For the 2002 update, SDS stakeholder involvement was carried out via the SDC only, mainly due to the time constraints in the run up to the WSSD.

The 1997 SDS emphasised that governments alone cannot guarantee the achievement of sustainable development, but need the support of all sections of society, including individual citizens. Consistent with this, the Minister for Environment and Local Government launched an environmental awareness campaign in December 1999. Under the theme of “*The Environment: It’s Easy to Make a Difference*”, the overall aim is to encourage people to identify and pursue more environmentally sustainable behaviour. The campaign was considered as successful, and the Environmental Information Service (ENFO), placed in the centre of Dublin, has also attracted public interest.

### 3 SD COUNCIL (COMHAR)

Comhar, the national sustainable development partnership (SD council), was established in 1999 as a forum for national consultation and dialogue on all issues surrounding Ireland’s pursuit of SD. Such a creation was foreseen indirectly in the 1997 SDS, which emphasises a partnership approach and intends to establish a “foundation for good partnerships with non-governmental interests”<sup>35</sup>.

Comhar’s terms of reference are to advance the national agenda for sustainable development, to evaluate progress in this regard, to assist in devising suitable mechanisms and advising on their implementation, and to contribute to the formation of a national consensus in these regards.

Its 25 members are drawn from five nominating panels, comprising 59 relevant national organisations from: (i) the State sector, (ii) economic sectors, (iii) environmental NGOs, (iv) social/community NGOs and (v) the professional/academic sector. In addition, the Chairman of the Parliamentary Committee on Environment and Local Government is an *ex-officio* member of Comhar.<sup>36</sup> It acts as a think-tank from a civil society and stakeholder point of view.

Comhar’s terms of reference allow it to address issues and make recommendations either on its own initiative or at the request of any government Minister. The latter is perceived as a matter of recognition, and not as a means for influencing the council’s agenda. It may address its recommendations to any Minister, sector or the general public. Its own initiatives and agenda dominate (e.g. it agrees on a three year work plan). With its link to

<sup>35</sup> Government of Ireland, 1997, p. 192.

<sup>36</sup> The possibility of attending SDC’s meetings has not yet been taken up.

the MinE, and also the lead responsibility of this Ministry for the SDS, this relationship is the closest within government. It faces the challenge to become acknowledged as overarching, in a situation where there are (other) traditional stakeholder institutions, which mainly involve only the social partners.

### 3.1 ROLE AND FUNCTIONS OF THE SD COUNCIL

#### *Role vis-à-vis the SDS:*

As the SDC was only established in 1999, its input to the SDS started with the 2002 update document, for which the government had asked for input. The council is regularly asked for advice and comments on significant policy proposals, mainly by the MinE. It has a monitoring role vis-à-vis the SDS. Recent key recommendations and advice on SD-related policies include<sup>37</sup>:

- Recommendations on proposals for carbon energy taxation, October 2003 (sent to the Ministry of Finance);
- Comments on the Draft Guidelines for Regional and Planning Authorities on Strategic Environmental Assessment, April 2004 (sent to the MinE);
- Recommendations on Draft Guidelines to Planning Authorities on Sustainable Rural Housing, April 2004 (sent to the Environment Minister);
- Recommendations on the Review of Local Government Financing, October 2004 (sent to the MinE);
- Recommendations on the Implementation and Review of the National Biodiversity Plan, November 2004 (sent to MinE).

#### *General functions, - views are shared by the council and government:*

- Advisory board to the government: challenging from an independent civil society point of view;
- reminder/watchdog for the holistic/integrated and long-term view: monitoring progress under the SDS and reviewing relevant policy proposals;
- think-tank;
- stakeholder/expert dialogue ‘among each other’; consensus building among the members is desirable (and takes place) and is important for a consensus-based country, and at the same time helps clarify the areas of disagreement (to the government); trying to break down barriers between different stakeholders;
- stakeholder members to take the views into their organisations (which is not requested, but happens in most cases);
- agenda setting and tackling difficult policy issues (“communicate to government which difficult decisions have to be taken”);
- encourage and stimulate good practice;
- increase awareness of SD (e.g. current pilot projects on SD awareness and education).

The council is represented on 8 monitoring committees for the National Development Plan and Operational Programmes for EU funding, to provide an integrated assessment.

### 3.2 INTERNAL ASPECTS OF OPERATION

#### *Council members operate on an equal footing:*

- The council has a cooperative approach with consensus aimed at - there is no majority voting. The atmosphere ranges between open and informal brainstorming on themes and strategic issues, to some combating of the stakeholder groups.
- It has an independent status, with some members from the state/public sector (local municipalities, county councils, EPA, and one from the MinE).
- “Double-hat” of council members: The council is in an in-between situation, moving from the representational type to the more deliberative type. There are different opinions and often strongly held views, but no conflicts have arisen from the “double-hat” situation: As council members had asked about their role, a “Members Handbook” was issued, which addresses the need for members to make a distinction between their own organisations view and that of the SDC. This issue occurs particularly for those members who are members of monitoring committees for the Operational Programmes (cf. above).
- Council members coming from NGOs tend to feel less strong than those from other, more traditional stakeholder organisations. Partly there is the function allocated to the SD council to giving environmental NGOs a platform for expressing their views; for reasons of ‘equal footing’ this appears as not very favourable. The business community was asked by government to participate in the SD council (as “obligation”), in addition to their other opportunities for influencing policies, which might be an indicator of the traditionally strong links to government. The benefit for business lies in gathering information on environment policy, and to get its voice heard.

#### *Relation to and role of socio-economic partners:*

The role of the above mentioned National Economic and Social Council regarding influence on policy-making is assessed differently, ranging from a low role as being only a research institution to having a powerful role and “competing” with the SD council. Particularly the environmental NGOs feel that way, as they are only represented in the SD council, which still has to earn its reputation and become influential, whereas the other bodies have a long tradition. The National Economic and Social Forum supposedly has become more visible recently, and the SD council has started to establish contacts with it.

#### *Relation to government departments:*

There is a close relationship to the MinE, to which the SD council is linked, and it has one member (out of 25). Only very few links to other Ministries exist (e.g. agriculture, enterprise, trade and employment). The council is consulted by the MinE on any new significant policy initiative, and receives drafts for comments under rules of confidentiality. The MinE would like to

see colleagues in other government departments consult more with the SD council.

### 3.3 ACHIEVEMENTS OF THE COUNCIL

#### 1 Government's view

- Valued as a stakeholder advisory body with high quality work; independent input is appreciated;
- it is beneficial that the SDC may address issues that are difficult for the government, and that it is
- working on consensus building among stakeholders.

#### 2 SDC's view

- Significant contributions to the 2002 update of the SDS;
- it stimulated the 'pillars' and gave feed back from the council's point of view;
- the council triggered the government to commission a study to evaluate the consequences of introducing new levies on certain types of waste and litter (chewing gum, ATM receipts and fast food packaging);
- work on biodiversity: a successful "pamphlet" was issued (a booklet written in provocative style by a well-known author, advocating action<sup>38</sup>); a new working group was formed in 2004 which has made recommendations on the mid-term review of the National Biodiversity Plan;
- advice on economic instruments for waste (cf. above, proposals are currently with government);
- two pilot projects on awareness of and education for sustainable development: one programme for schools, and one for civil society groups, both of which include demonstration actions helping to mobilise support for SD "on the ground".

The council's current priority fields, for which it has established Working Groups, mainly reflect what turned out to be 'difficult' fields (cf. ch. D.2):

- biodiversity,
- climate change,
- housing and spatial planning,
- waste,
- awareness and education,
- international issues.

Working Groups meet on an ad-hoc basis and as often as is necessary to deliver the task at hand. For example, the Climate Change Working Group met frequently in order to prepare a submission for the Minister for the Environment on the review of the National Climate Change Strategy and a subsequent submission to the Minister of Finance on the issue of carbon taxation. In the initial submission to the Minister for the Environment in 2002, two different views on emission trading and carbon tax were put

38 "A Living Island – Ireland's Responsibility to Nature" (2002).

forward, while in the subsequent submission to the Ministry of Finance there was agreement on the issue of carbon taxation (after the government had given signals for moving towards a carbon tax). Similarly, other working groups meet more frequently as time-frame for the task demands – the Biodiversity Working Group has met at approximately 3 week intervals over the period of May to September 2004 in order to prepare recommendations on the review of the National Biodiversity Plan.

Overall the council received quite some credit for its work from all interviewees. It is still seen to be in an experimental phase, particularly in the relationship to other stakeholder bodies in the socio-economic field, and to working on an 'esprit de corps'.

The council sees it as a future challenge that its principles for SD should be developed into a policy framework. It is also stated that it should try to focus more on strategic issues, instead of getting dissipated in local problems, mainly because it is difficult to build up momentum on the local level, which is too fragmented.

#### *Success-factors of a SD council*

- Independence: members should not represent their organisation but act as individuals with the experience of their organisation as background;
- Try to develop an attitude of experimentation with open dialogue and enthusiasm;
- Gaining acknowledgement of the government and other stakeholder partnerships through quality of work, and getting to agreements between stakeholders;
- Strong chair and well-acknowledged personalities as council members<sup>39</sup>;
- Good links into government.

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<sup>39</sup> The situation of the council up to mid 2004 was favourable in that its chairman was a well-known TV-personality with his own program/talk-show, sometimes addressing issues of SD.

## B Themes and scope

The 1997 SDS has in principle a comprehensive aspiration, but it focuses on environmental integration in

- strategic sectors (agriculture, forestry, marine resources, energy, industry, transport, tourism and trade), and
- supporting sectors (environmental quality, spatial planning and land use, the built environment, public action and awareness, and Ireland's international role).<sup>40</sup>

The update document of 2002 includes the social dimension a bit more, but mainly emphasises the environment–economy link, given the pressures on the environment due to the economic boost in the 1990s, whose effects on the environment were only then fully realised.

The 2002 update takes up seven themes with 12 connected principles as proposed by Comhar.<sup>41</sup> Government commits it self to pursue SD over the next decade, and sets out five key objectives:<sup>42</sup>

- keeping the economy competitive in a rapidly changing world, including the pursuit of greater eco-efficiency,
- providing a stronger basis for further economic prosperity,
- bringing about a fairer and more inclusive Ireland,
- promoting and securing a high quality environment,
- contributing well to sustainable development at the global level.

These objectives do not fully fit with the subsequent sub-chapters:

- eco-efficiency,
- quality of life, covering awareness-raising for more sustainable consumption,
- social policy: implementing the revised National Anti Poverty Strategy (NAPS), which sets partly quantitative targets (e.g. for poverty reduction, level of social welfare, education, gaps in premature mortality between the lowest and highest socio-economic groups).

The following policy priorities are then stated (covering largely the environment dimension):

- climate change: meet the commitments of the Kyoto protocol (currently exceeded), further implementation of the National Climate Change Strategy (2000) and intensify work in the sectors concerned (energy, transport, industry/commercial/services, agriculture, forestry, housing); also, the groundwork will be laid to meet more stringent commitments in the post 2008–2012 period;
- nature, biodiversity and heritage: implement the National Biodiversity Plan of 2002 and the National Heritage Plan of 2002;

<sup>40</sup> Comhar, 2001, p. 3.

<sup>41</sup> From a comparative point of view the 'themes' rather appear to be 'principles', and the 'principles' are rather qualitative objectives.

<sup>42</sup> DOELG, 2002, p. 92 – 98.

- environment and health: improve river water quality (reference to the EU Water Framework Directive), major investments in wastewater treatment (funds allocated by the National Development Plan and the Water Services Investment Program), increase efforts to reduce nutrients input from agriculture, improve air quality (reference to the EU National Emissions Ceilings Directive);
- waste management: as the government policy states (“Preventing and recycling waste: delivering change” of 2002) a dramatic change is needed from reliance on landfill in favour of an integrated waste management policy which prioritises minimisation. This document includes quantitative targets, which are repeated in the SDS.

Several cross-sectoral priorities are included in addition, such as:

- the National Spatial Strategy: will have a 20-year time frame and will set out for the first time a long-term national framework to achieve a more balanced regional development in Ireland;
- “working with the market”;
- regulatory reform;
- Strategic Environmental Assessment (principles of the EU SEA Directive have already been incorporated in the Planning and Development Act of 2000; the EU Directive was transposed in July 2004 and will be applied to all sectors according to the Directive);
- Local Agenda 21 (revised guidelines on LA 21, cf. ch. A.1.4);
- non-governmental organisations (maximise participation through fora such as the SD council);
- research: EPA to produce a comprehensive assessment of the state of environment in Ireland;
- continue the work on indicators.

Altogether, as already stated above, the architecture for priority fields, principles, objectives and targets (only stemming from other strategies), and the relation of the different government strategies with each other and to the SDS, are not fully plausible. Preparing the strategy is seen as a process of mutual influence: policies already in place feed into the strategy, which is then meant to set an overall context and other policies fill in. Nevertheless the impression prevails, that the SDS update rather compiles what is already going on, without scrutinising or reflecting on priorities.

## C Relation to the EU (SDS) and other international strategies

### 1 CONSIDERATION AND IMPACT OF THE EU SDS

The 1997 SDS was influenced by a wider range of documents including Agenda 21, the 5th EAP and the 1996 State of Environment Report.

The 2002 SDS (update) also refers to international policy frameworks and measures national progress for the priority fields of the 6th EAP (climate change, nature and biodiversity, environment and health, resource efficiency and waste management) with related indicators.<sup>43</sup>

Within the Ministry of Environment there is both a unit for the national SDS, which is also responsible for the EU SDS, and a unit 'environment international' (including overall EU policy coordination), with close relationships between the two. Overall, it is stated that in a small country responsibilities tend to be overlapping, and the links are short within and between Ministries. Hence the institutional situation for linking the national and the EU SDS is favourable.

Nevertheless the 2002 SDS (update) refers to the EU SDS, and explains its content, but does not explicitly reflect the national priorities on the basis of the EU ones, though it is stated that the strategy "requested the Council of Ministers to develop arrangements for implementing the EU SDS"<sup>44</sup>. EU targets in place improve acceptance on the national level, which would also apply to the EU SDS even if not legally binding, enhanced by the fact that it is endorsed by the European Council (Heads of Government).

The 6th EAP provided a more appropriate framework for the priorities of the Irish SDS.

The overall attitude towards the EU tends to be positive, with EU legislation as a driving force for moving forward in environment policies, and structural funds having supported the boosting of economic development in the country. Ireland considers itself as playing an active role at EU level and not being a passive recipient.

### 2 SD COUNCIL (COMHAR): EUROPEAN AND INTERNATIONAL DIMENSION

The SDC has been involved in European co-operation through EEAC since 2002<sup>45</sup>, given an earlier domestic focus including some internal restructuring of the council. It was very active in the course of the Irish EU Presidency, including co-organising the conference on *Challenges and Opportunities for Sustainable Development in an Enlarged EU* (April 2004)<sup>46</sup>, and gave recommendations on the review of the EU SDS (October 2004).

Other international activities of the SDC included:

- Bi-lateral meeting with UK SDC in February 2004;

<sup>43</sup> DOELG, 2002, chapter 5.

<sup>44</sup> DOELG, 2002, p. 86.

<sup>45</sup> One council member of Comhar has been on the Steering Committee of EEAC since 2004.

<sup>46</sup> [www.comharconference2004.ie](http://www.comharconference2004.ie)

- Promotion of UNEP activities, together with ENFO (the information service of the MinE) and representation on UNEP's network on National Committees;
- Representation (as rapporteur) at UNEP's Global Civil Society Forum in Korea in March 2004;
- Presentation to UN CSD 12 in New York in April 2004;
- Representation at Learning to Change our World, an international consultation on education for sustainable development held in Göteborg, Sweden, May 2004.

The SDC has considered the EU SDS in its advice for the 2002 national SDS update.

### **3 LISBON PROCESS: PREPARATION OF SPRING SUMMITS**

The Lisbon process and Spring Summits are coordinated by the PM Office, which leads a so-called Lisbon group of senior officials. The Director General for Environment (as well as other relevant Ministries) is a member of this group, and tries to ensure that the environmental dimension is taken on board. Overall, the EU SDS is considered as adding the environmental dimension to the Lisbon process.

The input to the Spring Summits is prepared by the above mentioned unit in the Ministry of Environment that is responsible both for the national and EU SDS. The SD council has not dealt with Spring Summits so far.

### **4 POLICY FIELDS UPSTREAM AND DOWNSTREAM**

*Upstream action - EU activity is desired/required*

- climate change: carbon energy taxation; policy commitments for post 2012;
- chemicals;
- harmonised taxation would be desirable (Ireland is arguing for it at EU level), but is considered as difficult because of unanimity; the government had intended to introduce a national carbon tax with effect from 1st January 2005, but abandoned this plan.

It is stated that any policy touching upon competitiveness is currently problematic not only in Ireland, but across Europe.

The open method of coordination is favoured to be used as a stepping stone in policy fields in which the EU is not competent, in order to exchange best practice. A better system for sharing experiences should be established (like the OECD peer review system).

*Downstream impact - EU policies hampering national SD processes*

Besides CAP, which also causes constraints for Ireland, nothing is addressed (as EU policies are, the other way round, favourable for the national agenda).

*Conditional targets and implementation*

Do not exist in Ireland.

## D Achievements and shortcomings in the national SD agenda

### 1 SUCCESSES AND SHORTCOMINGS

Overall the SD strategy is seen in the light that there is no panacea, and that conflicts are endemic, as part of normal “give and take” between government departments, and also between stakeholders.

- The SDS has increased awareness of the need for environmental policy integration. At the same time a more overarching approach is not yet in place.
- Some progress has been made in sectoral policy fields, which were partly triggered by the SDS and its review in 2002.
- Getting other Ministries committed remains a challenge.
- The National Development Plan has to be put in the light of SD: some progress has been made, but it remains quite challenging.

Achievements and failures in policy fields include:

- The review National Climate Change Strategy has been delayed (a revised document is still awaited). Following a public consultation process, the government has abandoned plans to introduce carbon taxation from 1st January 2005.
- Inclusion in the Planning and Development Act 2000, of sustainable development as a yardstick against which development proposals are to be evaluated, is a positive development; but the failure adequately to address the proliferation of one-off housing in the countryside remains a serious concern. The draft Rural Housing Guidelines raise serious questions on principles of SD for government policy as continued since the 1997 SDS.
- The National Biodiversity Plan and the National Heritage Plan (both of 2002) and the establishment of extensive conservation areas for biodiversity are positive, but prioritised targets and timescales for species and habitat protection and conservation are missing, and there is a need to develop indicators to measure progress of conservation measures.
- The Waste Strategy of 2002, the establishment of a waste prevention programme, the introduction of a plastic bag levy and the landfill levy, as well as the establishment of the Office of Environmental Enforcement, are all achievements. Ongoing commitment is required to further develop recycling infrastructure and promote education, awareness and behaviour change.
- Agriculture: Concerted efforts by government and stakeholders are required to meet the challenge of implementing the Water Framework Directive; there has been significant investment in water services to meet development needs, tackle water quality problems and upgrade rural water supplies; adoption of water catchment strategies is an important step in protecting and improving water quality in rivers and lakes. The delayed implementation of the Nitrates Directive remains a concern.

- The draft Rural Housing Guidelines raise serious questions on principles of SD for government policy as continued since the 1997 SDS.
- Energy efficiency has increased significantly and increased funding for investments in renewable energy is now coming on-stream.

## 2 MOST DIFFICULT POLICY FIELDS

Significant environmental challenges remain in the areas of water (eutrophication) and air quality, ensuring protection of habitats and species, and deterioration of the urban environment. In addition, Ireland is experiencing growing problems associated with changes in consumption patterns linked to recent increases in per capita incomes, notably waste generation, transport and urban sprawl, the latter two also arising from dispersed population. These problems are seen as a product of increased economic activity of the last 30 years, mirroring similar, but earlier, changes in other countries. Policies preventing these developments earlier were not in place, so now a catching-up is going on.

The main difficulties hence are:

### *Climate change/energy:*

The burden sharing agreement levels are currently exceeded. Overall energy consumption levels with a low share in renewables outweigh relatively good figures in energy intensity. The abandonment of proposals for carbon taxation narrows the options for mechanisms in Ireland for encouraging reductions in greenhouse gases to meet its Kyoto obligations.

### *Waste management:*

The policy field faces a serious backlog, as there was no legislation until 10 years ago, and there are management and service problems. Business considers progress as possible, as there are win-win situations. There is a strong resistance in the population against waste charges; recycling targets are not met – recent trends in recycling of municipal waste are more encouraging but there remains a significant challenge to meet the national target of 35% by 2013.

### *Agriculture:*

Heavy nutrient input and delay in implementing the Nitrates Directive has exposed rivers and lakes to ongoing pollution threats; after protracted consultation and negotiation with relevant interests, the government intends to apply an Action Plan to Ireland as a whole and this should lead to reductions in phosphorous and nitrate loadings from spreading of organic manures. Decoupling, a single payment system and cross compliance under reformed CAP, should also bring benefits. The implementation of the Habitats Directive will be a major challenge.

*Transport:*

The previous phase, when the environment portfolio was together with road transport in one Ministry up to 2002, is considered as having been beneficial for environmental integration. Nowadays there is strong political consensus to continue giving priority to road infrastructure; this outweighs the institutional advantage that road and rail is now in one Ministry. In the five year period up to 2003 there was a 127% increase in greenhouse gases in the transport sector.

*Air quality:*

Inter alia difficulties with meeting the EU National Emission Ceilings.

*Planning and housing*

This is another field with structural difficulties, which lacks streamlining and control of the planning system throughout the levels in general, and the implementation of the SD principles of the national planning legislation in local planning guidelines in particular. Local Development Plans are adopted by local councils without a systematic check by an upper level.

**3 IMPROVEMENT POTENTIALS FOR THE NATIONAL SDS**

Procedural: set quantitative targets and introduce a monitoring system; improve the vertical link; lead responsibility might be reconsidered;  
Content: work on progress in environmental integration, but strive for a more overarching strategy as soon as possible; try to better integrate the economic benefits of environmental policy;  
Overall: better harmonisation, and having measureable targets in a single document with appropriate time-frames.

**4 NATIONAL SDS: ACHIEVEMENTS AND CHALLENGES**

Achievements and challenges are assessed in a summarised way as follows<sup>47</sup>:

- + The SDS put issues on the agenda that had not been there before, and addressed others differently than before; some progress has been made in key policies like the National Development Plan;
- +/(◆) Ireland seems to take seriously the need to tackle the backlog of environmental problems; the state of environment at the same time reveals that environmental policy was neglected during the 1990s; there are still challenges in pollution reduction and prevention;
- +/(◆) References to the EU SDS are not “linked” enough; national coordination mechanisms are favourable for a better linkage;

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<sup>47</sup> + achievement  
 (+) partial achievement  
 +/◆ mixed: achievement and challenge  
 (◆) partial challenge  
 ◆ challenge

- +/(◆) Stakeholder consultation has faced the challenge of opening up towards interest groups that were not part of previous corporatist arrangements; though wider consultation is now taken rather seriously, the traditionally strong groups still prevail; the SD council has played an increasing role in giving advice from an overall stakeholders point of view;
- +/◆ The SDS is still focusing on environmental integration, which is crucial for the country and hence so far appropriate; getting other Ministries committed though will remain a challenge and joined-up thinking is still lacking; the concept of SD in this situation might face the problem of remaining environmentally biased; the lead of the Ministry of Environment will have to be reflected upon, at least when the SD agenda is moving towards a more overarching stage;
- (+)/◆ Vertical coordination is meeting challenges, particularly facing the somehow weakly co-ordinated and controlled planning system for land use and economic development;
- ◆ Lack of (quantitative) targets and systematic monitoring for the SDS.

## E Recommendations for the EU SDS review

The SDC recommends:

- The revised SDS should refocus on the imperative of greater environmental integration, notably in the transport and energy sectors, including through the development of overall and sectoral objectives as well as of effective monitoring mechanisms, and review and promote progress towards agreed targets.
- There is a need to identify delivery gaps, intensify implementation measures, and foster better links with national sustainable strategies. A stronger political commitment and willingness to tackle difficult issues is required.
- A clear commitment is required to move away from unsustainable patterns of production and consumption to a new pattern of responsible competitiveness with a lighter environmental footprint, greater social justice and investment in recovery of biodiversity and environmental quality.
- The EU SDS is remote from the people; communication of sustainable development in a more accessible way is necessary as well as the integration of sustainable development principles into the formal education system at all levels.
- More progress is needed to shift the tax burden from employment and labour to activities, such as in the transport sector, which gives rise to environmental pollution. It would be desirable to put in place a general framework for transport infrastructure pricing.
- Overall a more ambitious SDS would support domestic processes, and setting EU targets would be desirable, as well as a proper system of SD indicators.
- Further work is necessary to put in place a comprehensive impact assessment and reporting system for sustainable development purposes; the application of sustainability impact assessments should be extended to external as well as internal impacts of EU policy proposals, e.g., in the area of trade. Analysis of policy proposals should quantify the costs of not taking action in terms of their impacts on human health and the environment and set it out alongside the benefits of taking action.
- The Commission, together with the Member States, should examine the extent to which the open method of co-ordination could be used to spread best practice and achieve greater convergence towards the main EU sustainable development goals.

MinE mentions:

- Introduce a better mechanism for applying the open method of coordination to policy fields where the EU is not competent;
- probably a longer digestion and negotiation on the level of Heads of Government is needed.

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## INTERVIEWEES

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