



Coalition 2030 SDG National Implementation Plan 2020-23 Review Irish Government Consultation Submission

1. Introduction

Coalition 2030 is an alliance of 75 civil society organisations and networks. These organisations come from the international development, environment, social inclusion/anti-poverty, trade union and academic sectors, to ensure Ireland achieves the Sustainable Development Goals (SDGs), both at home and abroad.

The last review of progress made towards the SDGs was the 2018 Coalition 2030 Report¹, that sets out some of the most pressing issues with regard to Ireland's SDG performance from the standpoint of Coalition 2030. The review examined the weaknesses in Ireland's National Implementation Plan and set out recommendations for improvement.

Very limited progress has been made since the 2018 review, and many of the issues identified remain the same, in part due to the challenges and constraints caused by Covid-19. Most recommendations made remain relevant, with a new focus on creating a 'Just Recovery' from the effects of Covid-19 and ensuring those hit hardest and those with marginalised voices are recognised and supported.

This document provides an overview of insights captured in a workshop held with Coalition 2030 members in June 2021, conducted by the former Coalition 2030 Coordinator. The workshop involved a review of the key areas of concern highlighted in the 2018 report on the Government's National Implementation Plan (NIP). Members were asked to identify relevant updates, add any new or emerging concerns and share any new ideas to improve the NIP. The 8 main areas of concern in 2018 were:

1. Responsibility and accountability
2. Education and awareness
3. Structure and detail of the implementation plan
4. 'Leave no one behind' principle
5. Stakeholder analysis
6. National Stakeholder Forum
7. Policy coherence
8. Data and monitoring

In addition to reviewing these areas of concern, this paper provides a high-level 'traffic light' assessment of committed actions under the NIP 2018-2020, which provides useful comments from members about where progress has been hindered.

¹ <https://www.ireland2030.org/report-2018>

Coalition 2030 hopes this consultation exercise provides a useful and unifying move forward for the National Implementation Plan. It is particularly concerned to progress from having effective structures and processes in place, to more of a focus on effective policy development and driving achievement of the SDGs.

2. Workshop Consultation

This section collates members' views about each of the 8 areas of concern that Coalition 2030 has identified in relation to the progress achieved through the National Implementation Plan 2018-20.

2.1. Responsibility and accountability

Coalition 2030 is encouraged by the recent activities of the new DECC team. They have openly identified concerns raised about the NIP, particularly relating to poor joined-up policy development, limited progress to date, the need for improved reporting mechanisms and better engagement with local authorities.

However, it remains unclear who in each Government Department is accountable for the SDGs. There was consensus across members that it is critically important to put robust systems for monitoring and accountability in place at the domestic level. Responsibility for delivery needs to go beyond awareness of relevant SDGs, to genuine understanding, effective communication and implementation of relevant policy development and policy outcomes across Departments. Building upon the momentum created by the new team in DECC, the move/integration of SDG responsibility to the Department of the Taoiseach longer term would facilitate stronger political backing, increased attention and communication cross-Government and should lead to improved policy coherence.

In addition, members highlighted Ireland's 'Roadmap to Social Inclusion 2020-25'² as an example that could be applied to the SDGs where specific Departments are named as responsible leads against each of the targets, with specific timeframes for delivery. The new NIP should include specific names and Departments to reflect the commitment, responsibility and accountability that are required by the SDGs.

Members seek to increase the level of ambition and sense of 'urgency' in Government related to delivering the SDGs, where it appears some targets are based on what 'Departments *think* we can achieve', rather than what we should be working towards.

Some members identified a key focus for work on SDGs as the implementation of effective finance and development models. It was recognised that priorities are changing globally, and Ireland should have ambitious, long-term funding programmes for development, aligning SDG work with the new financial priorities being implemented by other countries.

² <https://assets.gov.ie/46557/bf7011904ede4562b925f98b15c4f1b5.pdf>

2.2. Education and awareness

There was consensus amongst members that the Government needs to build on, and move on from, focussing attention on citizen awareness of the SDGs towards utility - using the SDGs to drive tangible progress against clear targets.

That said, remaining education and awareness activity needs to be recognised as a whole of Government responsibility, not just to be owned and delivered through development education funding. SDG target 4.7³, creating a society of active global citizens, is an enabler to achieving the full 2030 agenda - and is identified as critical to the fulfilment of the 17 SDGs.

A whole of Government responsibility for education and awareness should be underpinned by the SDGs framing all strategies and plans produced through Government, and adequate resources should be allocated to related activities. For example, the new Education for Sustainable Development Strategy requires appropriate allocation of resources to ensure effective delivery, and should ensure education is life-long and life-wide - ensuring learning takes place in real contexts and authentic settings, not just in schools. Irish Development Education Association (IDEA)'s 'Vision 2025' sets out their position that investment and funding for development education should be increased from approximately 0.6% of ODA to reach the European benchmark of 3% of ODA by 2025.

Members highlighted that the new Irish Aid for Development Education and Global Citizenship Education Strategy 2021-24 (forthcoming) needs to focus on SDGs, ensuring they are threaded throughout, in particular target 4.7 as noted above.

Related to issues of coherence described later, it is important that approaches, policies and resources related to education and awareness demonstrate coherence with human rights, for example, balancing finance and development models.

2.3. Structure and detail of National Implementation Plan (NIP)

There was consensus that the actions detailed in the NIP do not provide enough detail about how Ireland will achieve its commitments under the SDGs. The plan is perceived to lack tangible, time-bound targets which relate to issues of responsibility, accountability, coherence and effective delivery.

The next NIP should be a new comprehensive cross-Government plan, which clearly sets out actions across all relevant sectors to meet the SDGs based on input from all stakeholders, particularly marginalised groups and individuals.

³ Target 4.7 - By 2030 ensure all learners acquire knowledge and skills needed to promote sustainable development, including among others through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship, and appreciation of cultural diversity and of culture's contribution to sustainable development.

Members believe the NIP should have a longer-term vision to 2030. This should include ambitious targets, clear timeframes across each of the SDGs and, as noted earlier, a dedicated lead Department in relation to each action.

Members shared a perception that the Government believes that it cannot push for further action and progress related to the SDGs due to the impact and fatigue created by Covid, particularly for civil society. However, there was consensus that now is the time to build upon momentum, and to continue encouraging frontline and local community organisations to continue being creative and adaptive to meeting the needs of communities - for example supporting circular economy initiatives at the community level.

Members identified several recently published strategies and policies that make only one or two references to the SDGs, for example the new housing strategy, and underline the importance of all new strategy and policy development processes using the SDGs as a framework. It appears there are challenges in achieving this both horizontally across Government and virtually, down to Local Authorities, for example.

There is a perception that the NIP has taken a 'cost-neutral' approach to driving delivery of the SDGs, 'retro-fitting' approaches and activities to align with the SDGs at a surface level. Government needs to provide sufficient resources and develop appropriate capacity in order to ensure delivery of SDGs.

2.4. 'Leave No One Behind' principle

The NIP does not provide any detail about how groups will be targeted for prioritisation within the '*Leave No One Behind*'⁴ principle. Members felt that the next NIP should include plans to ensure that marginalised and under-represented groups or communities are targeted and prioritised in their participation and ownership of SDG implementation.

There is a need to align language and phrases, recognising that some organisations use '*targeting the furthest behind first*' and others '*Leave No One Behind*' - it is unclear if there are perceived differences in what these phrases mean and how to implement them in practice. In addition, many people and agencies continue to use the term 'vulnerable', which is viewed as outdated by many across disciplines and sectors, recognising that this places emphasis on the individual, group or community - whereas 'marginalised' places the emphasis (and power to address) on the structures and processes that seek to access and engage.

There is also a need to be clear who are 'marginalised and under-represented groups'. These groups should go beyond the protected characteristics, to include displacement, political and social discrimination, economic marginalisation and poverty - to ensure groups such as travellers and Roma are represented.

⁴ ODI Report 'Leave No One Behind - Five Years In to Agenda 2030' may be useful: <https://odi.org/en/publications/leave-no-one-behind-five-years-into-agenda-2030-guidelines-for-turning-the-concept-into-action/>

Members want greater visibility about how the needs and perspectives of marginalised groups influence policy development, how this is reflected in equality and related monitoring exercises, and how this is reported upon to bring attention to policy impacts for those individuals and groups.

Covid-19 has raised awareness of the inequalities in our systems and communities, and our health sector members emphasise the opportunity presented by the response to Covid to focus on those left behind and reset our health system to focus on the Prevention and Promotion aspects of Universal Health Coverage.

Our members underline the importance of using this consultation as an opportunity to enhance and align economic, social and environmental policies and legislation such that the most marginalised groups, communities and workers are better able to recover the impacts of the pandemic and withstand other external shocks into the future.

2.5. Stakeholder analysis

In alignment with the values outlined in the previous section - *'targeting the furthest behind first'* and *'Leave No One Behind'*, members reiterate the importance of the NIP including a full stakeholder analysis. This needs to move beyond a simple listing of key stakeholders and ensure differentiation between iNGOs, domestic NGOs, union bodies, private sector actors, academic institutions, grassroots organisations and others. Stakeholder identification and analysis should include marginalised and under-represented voices, including developing understanding of intersectionality related to needs and outcomes, recognising that there are no clear plans or targets to address disparities in policy outcomes affecting the poorest and marginalised groups.

This is required to ensure meaningful participation and representation of needs in SDG policy development, policy coherence and assessment of policy outcomes.

The SDG Champions Programme is linked to some of these issues, and good models elsewhere demonstrate the role of Champions in giving voice and improving meaningful dialogue across large networks of stakeholders. However, the objectives of Ireland's SDG Champion Programme were not very clear, and the process for implementation and recruitment lacked accountability and transparency. Members recognise the potential of the programme, but in its current form it is failing to make a positive contribution to dialogue, engagement and driving delivery of the SDGs.

To be effective, the SDG Champions need robust mechanisms for accountability and feedback, and they need to move beyond awareness raising towards focussing on driving implementation and achieving policy outcomes. Recruiting a wide range of Champions, demonstrating reach across the network, including civil society actors and for example including a Minister as a Champion, would bring significant credibility to the programme and support cross-Departmental working. In addition, providing the programme with resources to facilitate impactful delivery of work, beyond awareness efforts, would make an important contribution to achieving policy outcomes.

2.6. National Stakeholder Forum

In relation to the need for improved understanding of, and engagement with, stakeholders connected to effective delivery of the SDGs, the National Stakeholder Forum was viewed as an opportunity to facilitate timely, regular and meaningful participation, and this has not been achieved. The Forum was not equally accessible across sectors and an over-reliance on digital access and Zoom meetings risks further marginalising already under-represented voices.

Coalition 2030 members want to see a clear project plan prepared with the Forum, that includes a commonly agreed work programme, clear stage and joint, participatory working relations. This requires for the Forum to be adequately resourced and set up to support robust multi-stakeholder engagement that can drive policy development and accelerate progress to achieving the SDGs.

2.7. Policy coherence

The lack of integration and balance in how social, environmental and economic policy is developed is a key risk to the successful delivery of the SDGs. Members feel this lack of structure and process for policy coherence for development remains a priority for improvement in the National Implementation Plan. This should be a transparent, well-resourced mechanism to identify and tackle inconsistencies in policy development, for example relevant aspects of the country's tax regime and GHG policies. The Government's current approach demonstrates a lack of visibility of the SDGs in the framing of policies, caused by siloed working across Departments and leading to inconsistency and inefficiency in the policy development process. Improved integration across the goals would lead to balanced implementation, ensuring that progress in one area does not undermine progress in another.

Coalition 2030 members raised concerns about the continuing shortfall in budgetary allocations to overseas development aid, and lack of policy coherence in its international relations. There is a need to balance domestic policy with global sustainable development, addressing specific issues related to development mechanisms, and international relations, for example measures to address climate that may have negative impacts for poverty, migration or local trade.

Members indicate the need for guidance to support local authorities to embed SDGs in city/county development plan processes, and in developing new Local Economic and Community Plans. In addition, health sector members underline the importance of aligning and clearly committing to policy outcomes in all action plans, including for example the commitment to 'do no harm through mitigation of GHGs to net zero by the mid 2040s'.

There is a concern that Ireland's Economic Recovery Plan adds to the existing primary focus of the 'economic lens' on sustainability, that prioritises building economic activity and getting people back to work without balancing development in relation to culture, environment, politics and so on.

Culture in particular is increasingly recognised as an opportunity to drive inclusive and equitable policy development, demonstrated by UNESCO’s recent work⁵ on the role of culture in SDGs, establishing an international precedent in the field. The UNESCO approach places emphasis on the role of the SDGs in thinking about development beyond economic growth.

2.8. Data and monitoring

Members identified that some data on national level progress is available through Ireland’s SDG Data Hub and the Central Statistics Office (CSO) SDGs page⁶, but there remains room for improvement, including a more consistent approach to data collection.

It was agreed that the focus on data should be about collecting and sharing fully disaggregated data. Adequate resources should be provided to both the Central Statistics Office (CSO) and civil society organisations to ensure frequent, high quality and fully disaggregated data is provided across all SDG indicators. Disaggregated data should include ethnicity and gender across relevant administrative systems in line with human rights standards, and this data should inform Ethnic Equality Monitoring and equality proof state policies, budgets and programming.

The Government’s introduction of a Well-Being Framework⁷ (NESC, July 2021) was noted as positive progress, but there remains a need for the development of well-being indicators (beyond GDP) as promised in Ireland’s Programme for Government.

Some members felt that awareness, knowledge and perceptions of the SDGs across Ireland should be captured and reported on within Ireland, beyond only using the Eurobarometer⁸.

3. Traffic Light Assessment

At a recent members workshop, participants reviewed progress on commitments made under the SDG Implementation Plan 2018-2020. Their shared views are presented below using a ‘traffic light assessment’:

- Green - progress has been made/ action completed/ positive move forward
- Orange- unclear or mixed whether action is complete
- Red - no progress has been made/ action incomplete/ negative move backwards

⁵ <https://en.unesco.org/themes/culture-sustainable-development>

⁶ <https://www.cso.ie/en/statistics/unsustainabledevelopmentgoals/>

⁷ <https://www.nesc.ie/work-programme/well-being-framework/>

⁸ <https://europa.eu/eurobarometer/about/eurobarometer>

#	Government Commitment	Member traffic light assessment and comments
1.	<i>Prepare Ireland's first Voluntary National Review for delivery at the UN High-Level Political Forum at its next session in the summer of 2018.</i>	It was delivered, but note: <ul style="list-style-type: none"> - Process was non-participatory. - It was run as a government consultation on an already prepared document. - It was a poor and rushed process with a weak report.
2.	<i>During the lifetime of this first SDG National Implementation Plan, prepare a new Sustainable Development Strategy, taking Ireland's SDG commitments directly into account.</i>	No Sustainable Development Strategy has been produced.
3.	<i>In order to promote transparency and accountability, publish the SDG Policy Map on www.dccae.gov.ie/SustainableDevelopmentGoals, and update as necessary.</i>	<ul style="list-style-type: none"> - The policy exists but with little promotion or transparency. - Senior level support not in place. - Lack of resources to promote the policy map and provide transparency. - It is the 'bare bones', buried on CSO website...not accessible or revealing for wider public (or implementation not clear). - A policy map was created but not updated. The whole approach and emphasis on policy mapping is also concerning.
4	<i>Beginning in 2018, include reference in all new Statements of Strategy to all SDG targets for which a Department has lead responsibility.</i>	<ul style="list-style-type: none"> - Weak delivery, tokenistic in practice, 'lip service' - Waiting for update on documents - Mixed progress - not 'all' include references - some have.
5	<i>Departments will consider options available to identify those items of departmental expenditure which support specific SDGs.</i>	<ul style="list-style-type: none"> - Government views SDGs are a reporting mechanism, rather than a guiding document. (almost no mention of SDGs in HSE documents, for instance) - Unclear if this is happening - Consideration doesn't seem to have resulted in any outputs or results which is poor.
6	<i>In order to promote transparency and accountability, publish details of lead and stakeholder Departments for each SDG target on www.dccae.gov.ie/</i>	If this is happening, it is not very clear, and not transparent.

	<i>SustainableDevelopmentGoals, and update as necessary, taking into account any changes in departmental configurations.</i>	
7	<i>In order to promote transparency, publish on www.dccae.gov.ie/ SustainableDevelopmentGoals regular updates on the work of the SDG Interdepartmental Working Group.</i>	As above.
8	<i>Establish in H1 2018, a national SDG Stakeholder Forum.</i>	It has been put in place, but note: <ul style="list-style-type: none"> - The Forum has not met for over a year - It has not met during the pandemic - Prior to this, the meetings have been perceived as tokenistic and/ or a frustrating exercise.
9	<i>In order to promote transparency, publish on website details of the membership of the national SDG Stakeholder Forum, and the Forum’s Terms of Reference. In addition, publish the agenda and minutes of Forum meetings.</i>	Unknown whether this has been completed.
10	<i>The SDG Interdepartmental Working Group will develop a strategy around communicating Ireland’s key SDG priorities to national and international audiences.</i>	Unknown whether this has been completed.
11	<i>Develop an online SDG platform as a one-stop-shop for SDG information and learning.</i>	A platform has been created, but there are gaps.
12	<i>Select a limited number of national organisations to act as ‘SDG Champions’, who can leverage their public profile to raise awareness of the SDGs. SDG Champions will be selected following input from the SDG Stakeholder Forum.</i>	Champions have been recruited, but note: <ul style="list-style-type: none"> - Recruited champions but gave no resources to them to implement anything meaningful to raise awareness of the SDGs. - Poor implementation of a good idea. - The process for deciding the champions left a lot to be desired. The process also stopped.

4. Summary of Recommendations

Based on the limited progress made since our 2018 review of the NIP and SDG performance, our recommendations in the 2018 report remain relevant. Aligning with the feedback collated from our consultation workshop in 2021, this is a summary of our recommendations for the new National Implementation Plan 2021-23:

- 4.1. Strengthen a whole-of-government approach to delivering of the SDGs, both horizontally and vertically aligning policymaking at all levels, led by the Department of the Taoiseach.
- 4.2. Ensure a comprehensive education, awareness and communications plan to maximise awareness, ownership and engagement of SDGs.
- 4.3. The NIP requires a longer-term vision, including ambitious targets, detailed implementation plans and clear timeframes across each of the 17 SDGs.
- 4.4. A Lead Department is required for each action, including a full and inclusive stakeholder analysis.
- 4.5. The NIP should include detailed plans to ensure that marginalised groups are prioritised in SDG implementation as well as in SDG ownership and participation.
- 4.6. The National Stakeholder Forum should be improved to facilitate robust participation and provided with adequate resources to allow it to fulfill its mandate. Clear timeframes are required to ensure recommendations are properly incorporated into Government policy and mainstreamed across all relevant Departments.
- 4.7. Develop a transparent and well-resourced Policy Coherence for Development mechanism.
- 4.8. Facilitate and resource frequent, high quality and fully disaggregated data collection and sharing, across Departments and civil society organisations.

5. Conclusions

Coalition 2030 represents 75 civil society organisations and networks and recognises that not all were able to contribute to this consultation process, likely in part due to workload pressures and the consultation opportunity falling over the summer holiday period.

Further opportunities to inform and shape the Government's development of the National Implementation Plan and associated work is welcomed, in particular strengthening the whole-of-Government approach to delivering the SDGs.

Whilst this document presents several issues and blockers to progress of the National Implementation Plan, the promising areas of progress and the energy and ambition behind the recommendations generate a real drive for Ireland's success as a global leader in achieving equality and justice.

There is an opportunity to move the needle further to refresh the lacklustre progress to date and move in the direction of making a significant and cohesive impact on achieving our SDGs. We believe our recommendations, falling out of our breadth of experience working towards the SDGs provide a clear blueprint for action and tangible steps that must be taken if we are to seriously commit to a vision we helped to shape in 2016.