



Coalition 2030
MACRO Centre
1 Green Street
Dublin 7

3rd November 2022

Re: National Implementation Plan for the SDGs 2022 - 2024

Dear Deputy O'Reilly,

We wish to draw your attention to the publication of the Government's [second National Implementation Plan for the Sustainable Development Goals \(SDGs\) 2022-2024](#) which was launched in October by eleven Ministers¹, including Taoiseach Mícheál Martin, Tánaiste Leo Varadkar and Green Party leader Minister Eamon Ryan. **The SDGs are in the process of being mainstreamed across Government Departments, State Agencies, and Local Authorities via administrative, planning, and accountability frameworks. This will affect all policies, plans, and programmes.**

In this letter, we wish to provide you with our overarching analysis of the plan and outline developments pertinent to your remit as Dublin Fingal TD and member of the Committee on Enterprise, Trade and Employment.

We also wish to let you know that **we will be in attendance at the upcoming Sinn Féin Ard Fheis** in the RDS on November 5th, and we would welcome the opportunity to speak through these points with you in person.

Upon this plan's publication, we ask the following of you:

- Use the SDGs as your guiding framework or *umbrella lens* as you engage in policy development, **in particular by using the SDGs to frame Sinn Féin's manifesto for Government in advance of the next election.**
- Use the SDGs to inform your engagement and communication with stakeholders and the public.
- Reference the SDGs within your work.
- Link your work to specific SDG goals *and targets*.
- Begin to wear the SDG badge while carrying out your official duties and speaking in the chamber.²
- Familiarise yourself with the [Policy Map](#) which shows which Department is leading on each SDG target so that you are equipped to hold Departments and the responsible Ministers to account.

Regarding your work on the Committee on Enterprise, Trade and Employment, we ask you to

- Map and integrate those SDGs and sub-targets which are relevant to the Committee's remit into its Terms of Reference and the activities in its Work Plan.
- Ensure your Committee addresses SDG implementation, not merely as a one-off meeting/topic, but as *a consistent core benchmark of policy planning and delivery*.
- Ensure the Committee specifically discusses actions being taken by its line Department to support SDG implementation.
- Report at least annually to your Committee's line Department outlining the strengths and weaknesses in SDG implementation which have emerged during deliberations in the preceding months/year.

Background to the SDGs

Sustainable development was defined in the World Commission on Environment and Development's 1987 Brundtland report 'Our Common Future'³ as '*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*'. It seeks to reconcile economic development with the protection of social and environmental balance. Increasingly, culture is being understood as the 'fourth pillar' of sustainable development⁴.

In September 2015, all 193 UN member states agreed to work towards achieving 17 'Sustainable Development Goals' by 2030 (see Annex 2). Ireland, along with Kenya, co-led the negotiations that led to the agreement on these goals. They constitute the bedrock of the 2030 Agenda for Sustainable Development which represents a shared global

vision,⁵ and they are also known as the ‘SDGs’ or the ‘Global Goals’⁶. **The SDGs interact with one another, and the success of one goal is dependent on and affects the success of the others.** In other words, the goals are *interdependent* and have the ability to reinforce or hinder one another mutually. They are also *indivisible*, in that progress in one area cannot and should not be disentangled from progress (or lack thereof) in another. **This framework seeks to acknowledge the intersections between policy areas in order to reduce siloed policy-making** and to shine a light on the trade-offs that emerge in the act of policy-making so that they can be addressed. The SDGs are the only universally agreed framework for implementing a social floor informed by human rights, while also working to prevent ecological overshoot of planetary boundaries⁷, and **it is our strong opinion that the SDGs should be used as the overarching guiding framework for policy development, implementation, and monitoring in Ireland.**

We are almost halfway through the period of time we have to achieve the SDGs. However in Ireland and abroad, we’re facing a complex set of crises that are undoing gains on SDG progress; cost of living, conflict, an acute global hunger crisis, and climate change, not to mention the impacts of Covid-19. In a 2021 Nature study, ‘The social shortfall and ecological overshoot of nations’⁸, it was found that no country currently meets the basic needs of its residents at a level of resource use that could be sustainably extended to all people globally. **Progressing the SDGs has never been more important.**

Coalition 2030 high-level Analysis of the second National Implementation Plan for the SDGs 2022-2024

The National Implementation Plan for the SDGs 2022-2024 is a significant development that, if implemented fully, would without a doubt bring Ireland closer towards achieving the SDGs, in particular since it makes strides towards further embedding the SDG framework across all levels of government. We were particularly pleased to see actions related to departmental Statements of Strategy, Regulatory Impact Assessments, Memoranda to Government, the Consultation Process, and the Budgetary process, as well as the role of Oireachtas Committees. As has been made evident by the national approach to climate action, it is imperative that ambitions related to the ‘whole of government’ are sufficiently integrated into the principal administrative, planning, and accountability frameworks.

We were also pleased to see the inclusion of a new SDG-target reporting mechanism, which every Department will be required to report on in their Departmental Annual Reports. This level of reporting will ultimately allow for an annual whole-of-government report on targets.

We also welcome the changes between the draft and final plan including the addition of sections on Communications, Persons with Disabilities, and Human Rights, and the significant improvement of the sections on Education and Youth. The inclusion of these changes is a testament to the consultative process.

We strongly welcome the naming of lead Departments for each action, as this is fundamental to ensuring robust governance. However, we were surprised to note that the Department of Environment, Climate, and Communications (DECC) is listed as the lead for 77 actions and co-lead for another 8 of the 118 actions listed (See Annex 1)⁹. This requires further scrutiny, as the SDG Unit within DECC is very small with to our knowledge only two civil servants working full time on SDG governance, accountability, coordination, and communications. Nevertheless, there were no details in the plan as to if and how resourcing of this unit would be increased. This needs to be rectified urgently.

Additionally, we note once again the absence of a commitment to transfer overall responsibility for SDG implementation to the Department of an Taoiseach rather than DECC. Given the multifaceted nature of sustainable development and the fact that responsibility is spread throughout all Government departments, moving responsibility from DECC to the Department of An Taoiseach makes logical sense. This is something that Coalition 2030 has long been calling for and we regret the lack of even an explanation in the plan as to why this has not yet happened.

Moreover, it is not clear if there exists an accountability mechanism for ensuring that the actions listed in the various other plans will be achieved (e.g. on p.21). What matters as we approach the midpoint of SDG implementation is whether or not the policies laid out in each plan *are actually being progressed*; not whether plans exist or not. The SDG Unit does not at present, as far as we are aware, have at its disposal any mechanism which would allow it to hold the department responsible for each listed plan accountable for the policies contained within that are relevant to Ireland’s progress on the SDGs. This loophole and the subsequent inability to enforce SDG-relevant policies must be addressed.

That said, it is indeed very positive to see strides being made towards cohesive policy-making via the mapping of policies in the Policy Map 2022¹⁰. However, it is our view that what is needed is for *all specific indicators that will be*

assessed under these plans to be listed, rather than only the policy overview as is contained in the Policy Map. We appreciate that this strand of work would be cumbersome, but this just further exemplifies the need to increase the resourcing of the SDG unit.

Finally, we note that a large number of the actions listed are vague and general, with phrases such as “assess the potential”, “it is intended to”, and “will be explored” used frequently. Likewise, the sheer amount of actions that are focused on finding baselines is stark when looked at through the lens of a dwindling timeframe for SDG achievement. Finding a baseline does not qualify as a critical and impactful outcome and should not be treated as such. Given that we are nearing the mid-way point of both the SDGs and the lifetime of this Government, this is not demonstrative of the bold, transformation ambition required.

Key Government Commitments

Below are some of the key commitments made in the plan. We will be holding the Government to account for these actions, and we believe that it is incumbent upon the opposition to do the same¹¹. It is worth pointing out also that the Programme for Government includes a commitment to “Continue to work towards the UN’s 17 Sustainable Development Goals”.

- P. 22: “In implementing Ireland’s obligations under UN Human Rights treaties, officials will bring an SDG lens to their work”.
- Section 3.1.4: “Each Department will ensure an SDG point of contact is made publicly available and a list of points of contact for all Departments will be published on www.gov.ie/sdgs”.
- Section 3.3.3.2: A specific policy update will be provided annually by all departments leading on an SDG target on the work that the department is undertaking to achieve the target, any relevant action taken/planned and progress achieved to date. This will be supported by a new SDG-target reporting mechanism, due for release in Q4 2022.

Conclusion

During this effort to move Ireland towards a position whereby national policies are fully informed by Agenda 2030, we wish to express our continued commitment to working with all of Ireland’s policymakers for the purposes of driving the SDGs at home and abroad.

The next eight years offer the leaders of our country an opportunity to demonstrate their commitment to protecting those who are vulnerable and marginalised from being left further behind. The country’s policymakers have an opportunity to set in stone a social threshold informed by human rights below which nobody must fall, while at the same time making sure that we don’t overshoot the nine critical planetary boundaries, at least six of which are already overshoot as of the 2022 assessment¹². This is the challenge of policymakers in Ireland, and so **it has never been so crucial that we act to ensure that the interconnected policy framework that Agenda 2030 provides is integrated across Oireachtas planning and decision-making**. We are facing a complex interaction of multiple and cascading crises, and it remains that the SDGs are the only universally agreed framework to end poverty, reduce inequality, halt climate change and reverse biodiversity loss as we continue through what is already emerging as a pivotal decade for humanity, the ‘Decade of Action’. **Our decisions over the next ten years are likely to significantly shape the next thousand**, and it is crucial that nobody is left behind and that we reach the furthest behind first as political choices are made going forward.

We look forward to working with you in order to make that vision a reality.

Is sinne le mórmheas,

Coalition 2030

Coalition 2030 is an alliance of civil society organisations across the international, environmental, anti-poverty, and trade union sectors committed to upholding Ireland’s commitment to achieving the Sustainable Development Goals at home in Ireland and in over 50 countries by 2030 www.ireland2030.org

You can read more about our specific campaign demands here <https://www.ireland2030.org/national>

Annex 1: Lead Departments for each action in the second National Implementation Plan for the SDGs 2022-2024

Department of Environment, Climate and Communications	77
Central Statistics Office	8
All Government Departments	5
Department of Housing, Local Government and Heritage	4
Department of Rural and Community Development & Local Government Management Agency	3
Department of Enterprise, Trade and Employment	2
All libraries	2
Department of Environment, Climate and Communications & Department of Children, Equality, Disability, Integration and Youth	2
Department of Children, Equality, Disability, Integration and Youth	2
Department of Rural and Community Development & Department of Environment, Climate and Communications	2
Department of Environment, Climate and Communications & Local Government Management Agency	1
Department of Environment, Climate and Communications, Department of Rural and Community Development & Local Government Management Agency	1
Department of Public Expenditure and Reform, Department of Environment, Climate and Communications & Department of Finance	1
Department of Further and Higher Education, Research, Innovation and Science	1
Office of the Government Chief Information Officer	1
Department of Environment, Climate and Communications & Department of Public Expenditure and Reform	1
Local Authorities	1
Interdepartmental Working Group	1
Department of Environment, Climate and Communications & Interdepartmental Working Group	1
Department of Public Expenditure and Reform	1
Sport Ireland	1

Annex 2: The 17 Sustainable Development Goals

SUSTAINABLE DEVELOPMENT GOALS



Endnotes

1. The plan was launched by: Taoiseach Mícheál Martin, Tánaiste Leo Varadkar, Minister Eamon Ryan TD, Minister Charlie McConalogue TD, Minister Roderic O’Gorman TD, Minister Norma Foley TD, Minister of State Ossian Smyth TD, Minister of State Colm Brophy TD, Minister of State Frank Feighan TD, & Minister of State Malcolm Noonan TD, Minister of State Seán Fleming TD.
2. The Department of Environment, Climate and Communications can provide you and your colleagues with badges.
3. <https://sustainabledevelopment.un.org/content/documents/5987our-common-future.pdf>
4. <https://en.unesco.org/culture-development>
5. <https://www.unfpa.org/resources/transforming-our-world-2030-agenda-sustainable-development>
6. See Annex 2.
7. See Rockström, J., Steffen, W., Noone, K. *et al.* A safe operating space for humanity. *Nature* 461, 472–475 (2009). <https://doi.org/10.1038/461472a>
8. Fanning, Andrew L., et al. “The Social Shortfall and Ecological Overshoot of Nations.” *Nature Sustainability*, vol. 5, no. 1, 2021, pp. 26–36., <https://doi.org/10.1038/s41893-021-00799-z>.
9. See Annex 1 for a breakdown of ‘lead Departments’.
10. The Policy Map lists the Departments and the SDG target(s) for which they are responsible <https://www.gov.ie/pdf/238375/?page=null>
11. This is a small sample of what we believe to be some of the most crucial actions, however, you can find a list of all actions in the plan [here](#).
12. Wang-Erlandsson, L., Tobian, A., van der Ent, R.J. *et al.* A planetary boundary for green water. *Nat Rev Earth Environ* 3, 380–392 (2022). <https://doi.org/10.1038/s43017-022-00287-8>