



[sent via email]

Minister Malcolm Noonan TD
Leinster House,
Kildare Street,
Dublin 2.

Coalition 2030
Macro Centre,
1 Green Street,
Dublin 7.

23rd November 2022

Dear Minister Noonan,

We wish to extend our gratitude to you for co-launching the Government's [second National Implementation Plan for the Sustainable Development Goals \(SDGs\) 2022-2024](#) in October¹. As you are aware, we are now firmly in the period of SDG implementation and delivery and so 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.

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In this letter, we wish to outline developments pertinent to your remit as Carlow-Kilkenny TD and Minister of State with responsibility for Heritage and Electoral Reform. We also provide you with a brief background on the SDGs. Our high-level analysis of the plan's strengths and weaknesses can be found in Annex 1.

We also wish to let you know that **we will have a stall at the upcoming Green Party Annual Convention** in Athlone on November 26th, 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:

1. Work within the Green Party to **ensure that the SDGs frame the Green Party's next election manifesto**, in particular considering that the next Government will likely be in power for the majority of the final five years of the SDGs.
2. Use the SDGs as your guiding framework as you engage in policy development.
3. Use the SDGs to inform your engagement and communication with stakeholders and the public.
4. Reference the SDGs within your work, linking your work to specific SDG goals **and targets**.
5. Wear the SDG badge while carrying out your official duties and speaking in the chamber.²
6. 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.

The Department of Housing, Local Government and Heritage's Responsibility

As per the SDG National Implementation Plan, your Department must:

1. Include a commitment to Agenda 2030 in any new Statements of Strategy (Action 11a).
2. Ensure an SDG point of contact for the Department is made publicly available (Section 3.1.4).
3. Provide a specific policy update annually on the SDG targets for your Department including the work that is being undertaken to achieve the targets, any relevant action taken/planned, and progress to date¹ (Section 3.3.3.2).
4. Ensure its officials bring an SDG lens to their work (p.22).
5. Liaise with the LGMA to review existing Local Authority Networks to determine if SDGs can be incorporated or whether an SDG specific Network is required - **this was due in Q3 2022**
6. Based on the outcome of this assessment, liaise with the LGMA to implement Local Authority mechanism for SDG knowledge sharing - **due Q4 2022**
7. Liaise with the LGMA to consider where the role of SDG point of contact would best sit and at what level, and to identify the profiles and responsibilities attached to the Role - **due Q4 2022**

¹ This will be supported by a new SDG-target reporting mechanism, due for release in Q4 2022.

8. Liaise with the LGMA to review existing annual Local Authority reporting mechanisms across each Local Authority to assess solutions for the inclusion of the SDGs into the process - **due Q2 2023**

The specific targets for your Department as listed in the 2022 Policy Map can be found in Annex 4.

Committees

Note that we have emailed your party colleagues in the Committee of Housing, Local Government and Heritage, and the Committee Chair, Steven Matthews TD. We have stressed to them the importance of the Committee reporting to your Department at least annually in order to outline the strengths and weaknesses identified in SDG implementation. Additionally, we have requested that the Committee discuss actions being taken by your Department to support SDG implementation and that they map and integrate those SDGs and sub-targets which are relevant to your Department into the Committee's Terms of Reference and Work Plan. **Note we have also requested the opportunity to brief the Committee on SDG developments.**

Key Government Commitments

Below are cross-Departmental actions in the SDG National Implementation Plan which are critical for enabling the implementation of the SDGs. All Departments including yours must¹¹:

1. Include a commitment to Agenda 2030 in your Department's new Statements of Strategy (Action 11a).
2. Ensure an SDG point of contact for your Department is made publicly available (Section 3.1.4).
3. Provide a specific policy update annually on the SDG targets for which your Department is responsible including the work that is being undertaken to achieve the targets, any relevant action taken/planned, and progress to date (Section 3.3.3.2). This will be supported by a new SDG-target reporting mechanism, due for release in Q4 2022.
4. Ensure your Department's officials bring an SDG lens to their work (p.22).
5. 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".

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.** 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.**

Conclusion

In your party leader's address at the press conference to launch this plan, Minister Eamon Ryan stated that:

"The Sustainable Development Goals offer a blueprint to forge a more united and coherent way forward. They provide us with a framework to tackle the interlinked crises facing society today...the Goals represent the international community's collective roadmap, a roadmap which leads towards a safer, fairer, more prosperous, and sustainable world. A world capable of meeting our needs today and the needs of future generations to come. A key aim of ours, as set out in the plan, is to embed the framework provided by the Sustainable

Development Goals, into national and local government work and to ensure a coherent system-wide approach which allows for greater communication and joined-up thinking between policymakers across sectors...the SDGs must be achieved for everyone if they are to be achieved at all [emphasis added]. We intend to open a collaborative and inclusive dialogue to explore the concept of leaving no one behind, a key principle of the 2030 Agenda, and to understand what that means in an Irish context.”

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 floor 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 wish to express our continued commitment to working with the Green Party to drive the SDGs forward both at home and abroad. Please don’t hesitate to get in touch with us with any queries regarding the above.

Is sinne le mórmheas,

Coalition 2030 Steering Committee

Louise Finan	Head of Policy, Dóchas (Chair)
Oisín Coghlan	CEO, Friends of the Earth
Johnny Sheehan	Membership and Regional Manager, The Wheel
Laura O’Connor	Political Engagement and Campaigns Manager, Concern Worldwide
Karen Ciesielski	Coordinator, The Environmental Pillar
Joan McCrohan	Fórsa & ICTU Global Solidarity Committee, Trade Union Pillar nominee
Catherine Carty	UNESCO Chair at Munster Technological University
Aidan Kenny	TUI & ICTU Global Solidarity Committee, Trade Union Pillar nominee
Dearbháil Lawless	CEO of AONTAS

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 asks here <https://www.ireland2030.org/national>

Contact:

Meaghan Carmody
 Coordinator
meaghan@coalition2030.ie



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 with stakeholders from the Coalition 2030 steering committee, Coalition 2030 member Development Perspectives, Coalition 2030 member National Youth Council of Ireland, Croke Park representatives and other stakeholders at the launch of Ireland’s second National Implementation Plan for the SDGs 2022-2024, October 5th 2022.

Photo Credit: Department of Environment, Climate and Communications



Minister Ryan with the SDG team and stakeholders at the launch of the second National Implementation Plan for the SDGs 2022-2024

Photo Credit: Department of Environment, Climate and Communications

Annex 1: 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 to 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 3)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 unclear 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.

Annex 2: The 17 Sustainable Development Goals

SUSTAINABLE DEVELOPMENT GOALS



Annex 3: 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 4: Specific SDG targets for which your Department is lead

The Department of Housing, Local Government and Heritage is the lead for achieving the following SDG targets as outlined in the 2022 SDG [Policy Map](#).

1. Target 1.5: By 2030, build the resilience of the poor and those in vulnerable situations and reduce their exposure and vulnerability to climate- related extreme events and other economic, social and environmental shocks and disasters
2. Target 6.1: By 2030, achieve universal and equitable access to safe and affordable drinking water for all
3. Target 6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally
4. Target 6.4: By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity
5. Target 6.5: By 2030, implement integrated water resources management at all levels, including through transboundary cooperation as appropriate
6. Target 6.6: By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes
7. Target 11.1: By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums
8. Target 11.3: By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management in all countries
9. Target 11.7: By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities
10. Target 11.a: Support positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning
11. Target 11.b: By 2020, substantially increase the number of cities and human settlements adopting and implementing integrated policies and plans towards inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters, and develop and implement, in line with the Sendai Framework for Disaster Risk Reduction 2015-2030, holistic disaster risk management at all levels
12. Target 14.1: By 2025, prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution
13. Target 14.2: By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive oceans
14. Target 14.3: Minimize and address the impacts of ocean acidification, including through enhanced scientific cooperation at all levels
15. Target 14.4: By 2020, conserve at least 10 per cent of coastal and marine areas, consistent with national and international law and based on the best available scientific information

16. Target 15.3: By 2030, combat desertification, restore degraded land and soil, including land affected by desertification, drought and floods, and strive to achieve a land degradation-neutral world
17. Target 15.4: By 2030, ensure the conservation of mountain ecosystems, including their biodiversity, in order to enhance their capacity to provide benefits that are essential for sustainable development
18. Target 15.5: Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species
19. Target 15.6: Promote fair and equitable sharing of the benefits arising from the utilization of genetic resources and promote appropriate access to such resources, as internationally agreed
20. Target 15.7: Take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products
21. Target 15.8: By 2020, introduce measures to prevent the introduction and significantly reduce the impact of invasive alien species on land and water ecosystems and control or eradicate the priority species
22. Target 15.9: By 2020, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts
23. Target 15.a: Mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems
24. Target 15.c: Enhance global support for efforts to combat poaching and trafficking of protected species, including by increasing the capacity of local communities to pursue sustainable livelihood opportunities
25. Target 17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships

Endnotes

1. The plan was launched by: Taoiseach Micheál 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 and we will also have some at the Convention on November 26th.
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 1.
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 2 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>