



[sent via email]

Minister of State Damien English
Leinster House,
Kildare Street,
Dublin 2.

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

17th November 2022

Dear Minister English,

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 recently launched by eleven Ministers, including Taoiseach Mícheál Martin, Tánaiste Leo Varadkar and Green Party leader Minister Eamon Ryan¹.

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. Ireland is now firmly in the period of SDG implementation, and your Department has an important role to play in that effort.

In this letter, we wish to outline developments pertinent to your remit as Minister of State for Business, Employment and Retail at the Department of Enterprise, Trade and Employment.²

We also wish to let you know that **we will be in attendance at the upcoming Fine Gael Ard Fheis**, and we would welcome the opportunity to speak through these points with you in person should you be attending.

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

1. **Work within Fine Gael to ensure that the SDGs frame the 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.

The Department of Enterprise, Trade and Employment'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 date³ (Section 3.3.3.2).
4. Ensure its officials bring an SDG lens to their work (p.22).
5. Action 39(a): Assess existing relevant business sector fora and engagement mechanisms for most appropriate means of continuing SDG engagement with business - **Due Q4 2022**
6. Action 39(b): Based on the outcome of the assessment at [above], integrate SDGs as a fixed agenda item in an existing business forum or through an alternative engagement mechanism - **Due Q3 2023**

¹ See photo on the last page of this letter.

² In Annexes 2 and 3, you will find an overview of the SDGs as well as our analysis of the second National Implementation Plan for the SDGs.

³ This will be supported by a new SDG-target reporting mechanism, due for release in Q4 2022.

The specific SDG targets for your Department listed in the 2022 Policy Map can be found in Annex 1.

Committees

Note that we have emailed your party colleagues in the Committee on Enterprise, Trade and Employment and the Committee Chair, Maurice Quinlivan 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. We have also requested the opportunity to brief the Committee on SDG developments.

Conclusion

In your party leader’s address at the press conference to launch this plan, Tánaiste Leo Varadkar said the following:

“I think it's fair to say that the world has become a very different place since the 17 goals were originally adopted by UN member states back in 2015. But the goals remain just as relevant today as they did then, even if the way we go about achieving them might be different. The 2030 agenda is a compelling call to action, challenging each and every one of us. The goals are interdependent, and we need to ensure that we achieve them across government; here in Ireland but also on a worldwide basis. The problems we face today from climate action to security to inflation, can't be solved by an island acting on its own. ”

This December, the leader of your party will take up the mantle as Taoiseach and will hold that position during a crucial time in the trajectory of the SDGs. 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 while at the same time making sure that we don’t overshoot planetary boundaries⁴. 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 Government 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 you to drive the SDGs at home and abroad.

Is sinne le mórmheas,

Coalition 2030 Steering Committee

Louise Finan	Dóchas (Chair)
Oisín Coghlan	Friends of the Earth
Johnny Sheehan	The Wheel
Laura O’Connor	Concern Worldwide
Karen Ciesielski	The Environmental Pillar
Joan McCrohan	ICTU Global Solidarity Committee
Catherine Carty	UNESCO Chair at Munster Technological University

⁴ 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>

Aidan Kenny	ICTU Global Solidarity Committee
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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 asks here <https://www.ireland2030.org/national>



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 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 Communication

Annex 1: Specific SDG targets for which your Department is lead

The Department of Enterprise, Trade and Employment is the lead for achieving the following SDG targets:

1. Target 8.2: Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors
2. Target 8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services
3. Target 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value
4. Target 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment
5. Target 8.b: By 2020, develop and operationalize a global strategy for youth employment and implement the Global Jobs Pact of the International Labour Organization
6. Target 9.2: Promote inclusive and sustainable industrialization and, by 2030, significantly raise industry's share of employment and gross domestic product, in line with national circumstances, and double its share in least developed countries
7. Target 10.a: Implement the principle of special and differential treatment for developing countries, in particular least developed countries, in accordance with World Trade Organization agreements
8. Target 12.6: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle
9. Target 17.10: Promote a universal, rules-based, open, non-discriminatory and equitable multilateral trading system under the World Trade Organization, including through the conclusion of negotiations under its Doha Development Agenda
10. Target 17.12: Realize timely implementation of duty-free and quota-free market access on a lasting basis for all least developed countries, consistent with World Trade Organization decisions, including by ensuring that preferential rules of origin applicable to imports from least developed countries are transparent and simple, and contribute to facilitating market access
11. Target 17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships⁵

Annex 2: Background to the SDGs

Sustainable development was defined in the World Commission on Environment and Development's 1987 Brundtland report 'Our Common Future' 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 development.

In September 2015, all 193 UN member states agreed to work towards achieving 17 'Sustainable Development Goals' by 2030 (see Annex 4). 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, and they are also known as the 'SDGs' or the 'Global Goals'. 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 boundaries, 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', it was found that no country currently meets the basic needs of its residents at a level

⁵ All departments are the lead for this target.

of resource use that could be sustainably extended to all people globally. Progressing the SDGs has never been more important.

Annex 3: 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 5). 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 2022. 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 4: The 17 Sustainable Development Goals

SUSTAINABLE DEVELOPMENT GOALS



Annex 5: 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