

**Coalition 2030 Submission to the Public
Consultation on the draft National
Implementation Plan for the SDGs
2022-2024**



**SUSTAINABLE
DEVELOPMENT GOALS**

14th June 2022

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Preamble

In September 2015, UN Member States adopted the 2030 Agenda for Sustainable Development, 'Agenda 2030'. The 17 goals and 169 targets contained within are integrated, interdependent and indivisible, and balance the economic, social and environmental dimensions of sustainable development. They provide the only universally agreed and universally applicable framework for global evidence-based policy-making in this crucial decade - the Decade of Action. Despite the aforementioned nomenclature, out of the 15 years between 2015 and 2030, we now have not had a plan for approximately 2 of the years of the Decade of Action - representing over 10% of the time we have to achieve the goals, and a fifth of the Decade of Action.

The draft of Ireland's second National Implementation Plan for the SDGs thus comes at a critical juncture in the trajectory of Agenda 2030, in particular because we are almost at the halfway point of implementation. This plan therefore must demonstrate a level of ambition that appropriately matches the urgency demanded by the scale and breadth of intersecting environmental, social and economic crises which we are now facing in Ireland, and globally.

At the outset, we must mention the inadequate timeframe that has been given for public consultation. This draft has significant potential to spark local and national conversation while engaging communities and a range of stakeholders; however the timeframe of one month between publication and consultation deadline hasn't allowed for that level of engagement. This demonstrates a missed opportunity, in particular considering that the SDGs 'belong to everyone' as stated in this draft. A similar approach taken to that of the National Dialogue on Climate Action¹ could have been applicable in this case, and we would urge those with a mandate to produce the next Implementation Plan to emulate the strategy of the NDCA in future phases of plan generation.

Below are a suite of recommendations proffered by the approximately 70 civil society organisations of Coalition 2030, organisations across the international development, domestic anti-poverty and equality, climate and environmental and trade union sectoral pillars of society. We strongly urge the authors of this document to incorporate the following recommendations into the final National Implementation Plan for 2022-2024. We would be happy to speak through any of them for purposes of clarification.

¹ <https://www.gov.ie/en/publication/4bf2c-national-dialogue-on-climate-action-ndca/> "For Ireland to make this transition, we need to make changes in our society and economy, and a collaborative effort is required by government, business, communities, and individuals. Government and the public sector must lead by example, however delivering on this ambition is the responsibility of everyone in society. The National Dialogue on Climate Action (NDCA) will be the primary vehicle through which this will be realised, delivering a systematic means of actively engaging stakeholders and the public with climate action across Ireland enabling and empowering people at a local and national level."

Recommendations

1. Provide a plan and timeline for when the SDG Unit will be housed in the Department of the Taoiseach

We note and welcome the commitment as evidenced by Strategic Objective 1 to further integrate the SDGs into public administration, and for greater policy coherence for sustainable development (PCSD). We also welcome that the draft plan provides for a dedicated lead Department to be held accountable for achieving particular actions contained within the plan, and that each of the 169 SDG targets will be assigned to a department (Section 3.1.1) and look forward to seeing the Annex with this information.

However in order to progress at pace towards Agenda 2030, we need to elevate the status of the Goals nationally at all levels, but firstly at the level of Government commitment. What would significantly strengthen this plan therefore is an outline of how and when ultimate responsibility for overall SDG achievement will rest with the Department of the Taoiseach rather than the Department of the Environment, Climate and Communications (DECC). Housing the SDGs in the Department of the Taoiseach would facilitate stronger political backing, buy-in across all other departments, and increased policy coherence for sustainable development across Government, a key strategic objective of the plan.

We note the language at the National Stakeholder Forum on June 2nd that, ‘with new structures, it won’t matter that we are not in the Department of An Taoiseach’, however this does not provide a reason *why* the SDG Unit is housed in DECC. Indeed, the current positioning risks creating public confusion regarding the purpose of the SDGs which are a cross-cutting developmental agenda encompassing the 5 Ps of “people, planet, prosperity, peace and partnership”. The location within DECC risks creating the impression that these are “sustainability goals” focus solely on climate action which, while an important part of the Agenda, is not the only priority². At the very least, an explanation and rationale for why this ask has not been addressed yet should be offered. Leadership from the highest possible level of government is necessary for this agenda to get the traction needed to accelerate and impact meaningful action.

In terms of progressing this objective, the Irish government might look to Finland for inspiration. In Finland, the Prime Minister’s Office is in charge of coordinating the national sustainable development policy and is also responsible for implementing and drawing up the national

² “All SDGs must be considered a priority in order to deliver a successful achievement of Agenda 2030” - The Sustainable Development Goals in the EU budget (2021)

implementation plan for Agenda 2030³. It is worth noting that the 2022 SDG Index ranks Finland first of all top ten performers⁴.

2. Indicate, through a detailed logframe, how this plan will be implemented, coordinated and resourced

Government urgently needs to build both human and financial capacity in order to implement this plan. In terms of human resources, we note the size of the SDG Unit and commend the excellent work the civil servants within have done to develop and publish this draft, and indeed their work to progress the SDGs in general since they came into their roles in May 2021. However, the remit of the Principal Officer (PO) in the Unit is extensive, spanning Citizen Engagement, Climate Adaptation, the Aarhus Convention as well as the SDGs⁵. Given that there appear to be only two other people who work in this unit, it is our view that this unit is wholly under-resourced. In particular, in order to effectively coordinate the National Stakeholder Forums (NSFs) and the envisaged NSF Steering Committee, and to allow Ireland to develop a credible and accurate Voluntary National Review (VNR) for 2023 in genuine partnership with civil society - the unit needs more hands on deck. We are concerned that too much responsibility is being placed on this small (albeit evidently very dedicated unit), and the criticism that will follow is unfair to the individuals involved. Adequately resourcing the unit would go some way towards repositioning Agenda 2030 as central to our political system, but failure to act in this regard would continue to demonstrate a bald lack of political will. We therefore recommend that a plan is developed to resource the SDG Unit, in order to enable it to deliver its significant remit, and that this plan is included in the final implementation document for 2022-2024.

In terms of the financial resourcing required to ensure effective implementation of this plan, it is somewhat alarming that responding to the clearly identified need for capacity building at departmental level partly hinges on accessing funding in a competitive funding round for training from the OECD (action 23). Adequate funding underpins transformative policies⁶ and Agenda 2030 is no different. This weak commitment does not go far enough and we want to see an explicit commitment that this training will go ahead, despite the cost.

4.2: We welcome the commitment to include training and guidance for the Civil Service and State Agencies as a key priority of this Implementation Plan. However, in terms of the development of the 'bespoke' training, we query the absence in Actions 16 and 17 of any commitment to engage stakeholders in the development of the course and materials. It is

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https://www.esdn.eu/country-profiles/detail?tx_countryprofile_countryprofile%5Baction%5D=show&tx_countryprofile_countryprofile%5Bcontroller%5D=Country&tx_countryprofile_countryprofile%5Bcountry%5D=9&cHash=57727b611e5e4b5b1b521ca5a75cbd57

⁴ <https://dashboards.sdgindex.org/rankings>

⁵ As mentioned at the SDG NSF, 2nd June 2022.

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https://sdgfinance.undp.org/sites/default/files/UNDP%20Budgeting%20for%20the%20SDGs%20-%20Guidebook_Nov%202020.pdf

crucial that the expertise of civil society and business informs the development of any materials that will be employed as foundational capacity-building materials in the Civil Service and State Agencies.

4.2: Regarding Action 19, we query whether this circular will be regular, and how it will be ensured that those recently recruited to the Civil Service and State Agencies will be onboarded regarding their role's relationship to national implementation of the SDGs. We also have a query regarding the use of the term 'bespoke' to reference what appears to be a 'one-size-fits-all' training course, and would welcome increased elaboration on if and how courses will be tailored to each Department or Agency.

3. Elaborate on how local and national budgets will be SDG-proofed & expand upon the ongoing relations and progress to date with the Department of Public Expenditure and Reform (DPER)

We note the recommendation arising from the last consultation of 'Incorporation of a tracking or tagging system for the SDGs in the Budget and funding streams', and note that this was also mentioned at the NSF on June 2nd 2022. However, there appears to be an absence of a clear action related to this in the draft plan.

We note too that in section 4.1, there appears to be a disconnect between the powerful paragraph from UNDP Budgeting for the SDGs, and the subsequent intention by the plan authors to 'determine the benefit of including the SDGs as an additional layer of budgeting'. This appears to be contradictory, as if UNDP's advice is taken on board, it would follow that SDG budgeting is indeed essential in order to avoid 'disconnects between the strategic planning frameworks that have made commitments to the 2030 Agenda on the one hand, and public budgets that remain driven by "business as usual" on the other'. We recognise the value of green budgeting, equality and wellbeing budgeting, but given the 'integrated and indivisible' nature of the SDGs and their use as a 'safeguard against incoherent and unequal progress' (section 4.3), valuable time required for implementation could be lost in the process of researching something which we already know to be true, i.e. the value of SDG budgeting. Therefore we would recommend increased elaboration on how the SDGs will be used to inform the process of national budgeting demonstrated in the final plan.

Other national parliaments could provide input regarding the most effective mechanisms for ensuring budgetary alignment with SDG policy objectives. For example, in Finland sustainable development has been integrated into the state budget since 2018⁷. On page 9 of their 2020 VNR it is stated that "policy planning should guide the preparation of the budget, and reporting

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<https://www.eea.europa.eu/themes/sustainability-transitions/sustainable-development-goals-and-the/country-profiles/finland-country-profile-sdgs-and#:~:text=Sustainable%20development%20has%20also%20been.s%20Office%20Finland%2C%202020>).

should clearly indicate how the Government has succeeded in the allocation of resources into policy areas that promote sustainable development in a desired manner”.⁸

Finally it is our view that an annual report on the progression of the SDGs should be made, and so we welcome Action 8(c). However in addition we would like to see a commitment to report on national implementation to both houses of the Oireachtas, as even if this is implicit, it would be beneficial to make this explicit.

It is our recommendation also that this report should also include a commitment towards reporting on the national annual *spend* on the SDGs; again to both houses of the Oireachtas and annually until 2030.

4. Explain how local authorities will be held accountable to the aims of the plan

Local government is hugely important for successful implementation of the SDGs⁹. However, although this plan goes some way towards improving the mechanisms for ensuring local authorities are facilitated to drive the SDGs, there is significantly more that could be done to strengthen this part of the plan.

We note the 6 recommendations from local authority respondents for better incorporation of the SDGs into their work, and welcome the corresponding actions. However in Chapter 5 and in particular in 5.3.3, there is a dearth of explanation regarding how exactly local authorities will be held accountable in terms of using the SDGs as a tool for policy-making in Corporate and County Development Plans. For example, we are aware that Dublin City Council has included the SDGs in its 2020-2024 Corporate Plan but it has used this as justification for excluding the SDGs meaningfully from its City Plan. The response from the manager when questioned as to why the SDGs were not meaningfully included in the Dublin City Development Plan is that, “The UN Sustainable Development Goals are set out in Section 1.9.2 of the Draft Plan and are embedded in DCC’s Corporate Plan 2020-2024. The goals and priority objectives of DCC’s Corporate Plan 2020-2024 are linked to the UN Sustainable Development Goals and the issues raised in the submission are more appropriately addressed through the corporate plan¹⁰.” While we would welcome the alignment of the objectives of the SDGs with the policy objectives in the Corporate Plan, this should not be a reason to omit policy objectives on the SDGs from the Development Plan, which is the blueprint and vision for the City.

It is imperative that the National SDG Implementation Plan commits to ensuring each development plan contains a policy objective to achieve the SDGs. We would therefore like to see in the final National Implementation Plan a commitment that each County Development

⁸ https://sustainabledevelopment.un.org/content/documents/26265VNR_Report_Finland_2020.pdf

⁹ <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=754&menu=3170>

¹⁰

<https://www.dublincity.ie/sites/default/files/2022-05/ce-report-no-119-2022-draft-development-plan-public-submission.pdf>

Plan and the associated local area plans must include a policy objective to work towards the achievement of the SDGs, for example that of the Cork City Draft Development Plan 2022 - 2028 which lists Objective 2.1 on page 62 as “To integrate the UN SDGs and the NPF’s National Strategic Outcomes into land use planning and management of Cork City through specific development objectives that will be monitored and reviewed”¹¹. It also states on page 26 that, “This Plan is designed to ensure Cork City can play its role in supporting the delivery of the SDGs”¹². The Cork Plan also links the objectives in the National Planning Framework and the City Development Plan with the relevant SDGs at the outset. At minimum, we would also like to see a policy objective for each Council to promote the SDGs through the PPN and other community networks.

We would also like clarification on how local authorities (staff and politicians) will be facilitated to progress the SDGs during this period even though many county and city development plans have already been finalised, containing only tokenistic or minimalist reference to the SDGs. Development plans being adopted this year take us up to 2028, by which time it will be too late to authentically begin to take action. We would like the final National Implementation Plan for 2022-2024 to include details of the mechanisms that will be leveraged to ensure retrofitting of Agenda 2030 priorities into County and Local Area development plans.

What’s more, an annual report on the progression of and spending on the SDGs in each local authority should be produced and published by the County/City Manager each year up to 2030. This report would feed into the overall report presented to both houses of the Oireachtas annually.

5.3.2: With regards to the training, we would like to see a commitment that all of the training materials will be open source, and we would like to see more information regarding who will be managing what is surely going to be a significant capacity-building endeavour. We would also like to see information on how LA workers will be incentivised to take up any training. Will completing at least an initial training be mandatory for all staff? Just the scoping for this training is due for Q3 2023 which seems very far away considering this is evidently an important piece of work, and we would like to see this progressed much sooner.

5.3.2: We also note that even though a quarter of LA respondents were interested in the establishment of an SDG network, the language around this is weak as it is stated that ‘consideration will be given’ to this. Why doesn’t this go further? A number of the issues identified in the report i.e. engagement, communication, uptake seem to point to the existence of this network as a viable solution. This seems a watery commitment to the local groups as it is vague on detail. We would therefore like to see significantly more information and detail on this action.

¹¹ <https://publications.corkcity.ie/view/228805973/>

¹² <https://publications.corkcity.ie/view/228805973/>

This point should be read in context with section 7.1 where business groups have requested a Government Business focused stakeholder group led by the Department of Enterprise, as well as the commitment to “explore the most suitable mechanism or forum to better facilitate business sector input on the SDGs”. We would like to see a firmer commitment to the establishment of an SDG LA network as there is no transformation without localization¹³.

5.3.2: In terms of capacity building, there is no reference to The Association of Irish Local Government (AILG) or to councillors in terms of upskilling. This we believe is a major oversight and something which should be remedied in the final plan.

5.3.3: The importance of capturing LA data centrally and reporting on it is mentioned, but there is an absence of any reference regarding exactly where this data will be captured and shared. We believe that it would make sense to use the Geohive for this purpose and would like to see a corresponding action on this point. We suggest also the inclusion of local authority figures on the SDG-Data Governance Board, for example a member of the AILG, in order to integrate the committed-to local authority reporting mechanism into national data representations.

5.3.3: We note and welcome the stated importance of ensuring that the SDGs and Ireland’s commitment to Agenda 2030 are incorporated into the guidelines for the new Corporate Plans, amending them from their previous iteration which excluded explicit mention of the SDGs. However, despite the stated importance, there is no explanation regarding how Councils will be *held accountable* to incorporating the SDGs and Agenda 2030 into new Corporate Plans. There is currently no mechanism for ensuring consistency between development plans; as the stark discrepancy between those for Cork and Dublin demonstrates.

5.3.4: We welcome that the Department of Housing, Local Government and Heritage (DHLGH) is currently finalising planning guidelines to assist LAs in the preparation of CCDPs. However, it is unclear if and how LAs will be held accountable in terms of integrating the SDGs into CCDPs and we would like to see this clarified in the final plan.

5.3.5: We strongly welcome the inclusion of Voluntary Local Reviews (VLRs) into the narrative of this draft but regret the absence of corresponding actions on VLRs. It is noted that the 2023 HLPF would “be a good opportunity for Ireland to undertake its first VLR”, but nowhere is this committed to. Therefore we would like to see a firm commitment to Ireland presenting its first VLR in 2023.

The Collaborative Town Centre Health Check case study is innovative and interesting, but there are no corresponding actions from the government regarding how this model will be supported or scaled up. We also note the URBACT Project but regret that inclusion in this project and

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<https://www.uncdf.org/remarks-of-uncdf-executive-secretary-on-the-occasion-of-the-no-transformation-without-localization-side-event>

access to subsequent funding is competitive. It is our view that funding for every County Council to progress the SDGs should be made readily available, and this should be explicit in the final plan.

What's more, despite the obvious and important role local authorities must play in relation to the SDGs there is little commitment by way of engaging LAs as workers. The report should move beyond considering local authorities as conduits for implementation of the SDGs and engage the workers ultimately responsible in a meaningful way.

Finally, the final report should consider our recommendation that more localised oversight groups that mirror national and regional groups be established, drawing their membership from the key stakeholders and major groups.

5. Strengthen mechanisms for PCSD and use the language of 'unifying lens' or 'umbrella lens' when communicating how the SDGs will be used as a tool for ensuring policy coherence between and across all government departments

One of the overall objectives of the plan is to move Ireland towards a position where national policies are fully informed by Agenda 2030, leading to improved policy coherence for sustainable development (PCSD). We welcome the inclusion of proposed changes to Statements of Strategy, Annual Departmental Reports, Memoranda to Government, Regulatory Impact Assessments, the Budgeting Process and the Consultation Process (Chapter 4). It is our suggestion that the language of the SDGs as a unifying lens or umbrella lens is employed for consistency.

Additionally we note that the plan does not fully commit to using the SDGs as a framework to develop and advise policy measures, despite this being articulated by civil service members as an important use of the SDGs at the National Stakeholder Forum on June 2nd 2022. 'Integration of the SDGs into public administration, including incorporation into administrative, planning and accountability frameworks' is a move in the right direction though it's still non committal.

What's more, we note that the plan lists myriad strategies as examples of Ireland's domestic SDG implementation which will have impact during the lifetime of this Implementation Plan. However, mapping existing policies does not amount to a plan, nor does it evidence how the SDGs will inform strategies going forward. We would like to see a clear mechanism included in the final document which would ensure that all new policies are informed by the SDGs.

3.1.2: We welcome the commitment in the National Stakeholder Forum on June 2nd to publish the names of all members of the Senior Officials Group (SOG) and the Interdepartmental Working Group (IDWG), however we note that this commitment is not mentioned in the current draft. This needs to be explicitly committed to in the final plan.

3.1.3: In terms of the IDWG's Terms of Reference, we request that this be developed with Stakeholders including civil society, business, youth and education.

3.1.4: Increased information on the linkages between the SDG-Data Governance Board (DGB) and the communications plan on the SDGs would be welcome. In order to course correct in real time to ensure constant progress in achieving the SDGs, disaggregated and up-to-date data needs to be readily available to the public. We would also like to see a publicly available and up-to-date list of the members of the SDG-DGB. We note in action 2(c) that data is due to be published annually and we would like to see a commitment to more regular data provision, given the limited time left before 2030.

3.1.5: We firstly note the similarities between (i) and (iii) in this section and suggest this is remedied.

3.1.5: Secondly we note the inclusion of suggestions regarding the establishing of a specific Oireachtas Committee or a commitment to an enhanced role for the Oireachtas regarding reporting, but we do not see an action committed to regarding either of these suggestions. The action to 'engage' with the Oireachtas Committees is too vague and broad and instead this engagement should be framed in terms of the desired outcome as determined by the IDWG, the SOG and DECC.

4.1.3. We welcome this section and the idea to allow the public to search consultations by SDG is innovative. However we note, despite the strong language of 'will' and 'must', an absence of a clear corresponding action related to the statement that 'Government Departments and Local Authorities must identify and tag which SDGs their consultation relates to', and so we suggest an addition of an action 14 (b) to remedy this.

Finally, we would welcome a commitment to and timeline for a Policy Coherence Ministerial group or Committee, as is being progressed in Scotland.¹⁴

6. Incorporate the crucial role of workers into the plan

In general, the voice of workers and trade unions, one of our four sectoral pillars, is lacking or absent from most sections of the plan. The draft does not go far enough in terms of inclusion of the nine major groups and there is an unbalanced focus on some groups over others. For example there is a subsection on business (7.1) but no corresponding subsection on workers and trade unions; something which we would recommend is remedied for the final plan. Below

¹⁴ In September 2019, Ben Macpherson MSP, Scottish Government Minister for Europe, Migration and International Development announced that a new Inter-Ministerial Group will take forward the Scottish Government's commitment to policy coherence for sustainable development (PCSD) <https://www.intdevalliance.scot/how-we-help/policy-and-advocacy/policy-coherence-sustainable-development>

are a number of points spanning the document that should be strengthened by an attention to the role of workers.

1.4: The report references an economic recovery plan that provides “productive, innovative and resilient jobs.” In line with the SDGs and in particular SDG 8 this should also include a commitment to *decent* jobs in those plans. In fact, the report makes scant enough commitment to decent work. This section of the report should at least give equal footing to the ‘decent work’.

1.4: The draft references “the green transition.” This should be called ‘The Just transition.’ Such a change would closer match the aims and objectives of the report itself.

2.1.3: The draft makes a number of references to the need to improve stakeholder engagement without listing too many concrete examples for how to do so nor acknowledging where it fell down in the first place. A clear map of plans for engaging the nine major groups should be included in the report.

2.1.3.i and Chapter 5: A reference to the inconsistent implementation of objectives across departments/local authorities etc. is made, a point reiterated on numerous occasions across the report. However there is inadequate elaboration of how this will be ameliorated.

7.1: We would query as to whether there is an intention to include the results of similar surveys for the trade union group as per 7.1? If not, we would like to see an explanation for this. Is it the case that Trade Unions have not been included due to the need to undertake this consultation?

7.2: This section is weak by comparison to 7.1. and lacks clear recommendations for improvement, although we welcome the inclusion of civil society in the process of VNR generation. In particular we would like to see firmer commitments and timelines regarding ensuring genuine and meaningful partnership in the preparation of Ireland’s 2023 VNR.

7. Meaningfully include the voices of those left behind & use adequate data to inform practice

It is our view that this plan should consider the areas in society where we are actually furthest behind given the data. Chapter 8 maps the current strategies and policies that go some way to ensuring ‘nobody is left behind’ however it falls short of committing to improved policies, actions, interventions and targets that will ensure this. A focus on ‘Leave No One Behind’ is critical, but referencing other strategies is not enough. It must ensure these strategies are adequate and effective. For example, the draft mentions the Roadmap for Social Inclusion but there are problems with roadmaps such as these in terms of implementation, and so this chapter needs to be more ambitious and more focused on genuine implementation.

Chapter 8 could give consideration to the overlap between the SDGs which take a rights-based approach, and Ireland's international human rights commitments. Several of the UN human rights treaties which Ireland has ratified (CRC, CRPD, CERD, CEDAW) create a legal impetus for the State to consider the views of rights holders in decision making and policy discussions which affect them.

We would like to see more information on the forthcoming National Action Plan Against Racism with specific commitments around implementation, oversight, budget, NGO/Government engagement, and reporting.

We would also like to see detailed information on how women and families will not be left behind in the workforce due to childcare costs.

Additionally, the plan highlights and discusses existing pilot studies and strategies that have included marginalised groups in decision making processes and community planning, however it does not itself address a plan on how to engage marginalised groups with the SDGs or what it will do with this input.

We also wish to note that we welcome the focus on young people, but how do we truly engage the other groups in society - older voices, social enterprises? We would like to see an elaboration in this point in the final plan.

We would like too to see Government hold a national conversation about what 'Leave No One Behind' means to us as a nation and provide guidance notes and a framework of how this focus underpins all of Ireland's SDG work domestically and internationally. Alignment with human rights legal commitments need to be made more explicit, and duties and responsibilities of the public sector and businesses with respect to their obligations needs to be highlighted.

Finally, we recommend that as data on disability, and intersectional inclusion, is scarce, both at domestic and international levels, the actors/authorities tasked with producing improved plans are hindered in doing so. We therefore recommend an investment in inclusive and disability disaggregated data to help governments plan better.

8. Strengthen the chapter on education, in particular by recognising the importance of Adult and Community Education in formal and non formal educational settings, as well as ESD at all levels of education

In general, the view of education in this section is very narrow and focused on formal education which is somewhat disappointing. Not to see adult, community and further education as education is a mistaken view of SDG 4, Quality Education. UNESCO take the view that learning is

lifelong and lifewide¹⁵ and so the Implementation plan needs to reflect SDG 4 and in particular 4.7 in this regard.

This chapter is extremely light on explicit commitments regarding improving education in all its forms as a reflection of the SDGs and as a tool to progress the SDGs. It instead lays out strategies and so does not read like a plan. What's more, all actions are placeholders, which demonstrates that a relative lack of consideration has been put into this chapter.

Additionally, the Education and Training Boards and Solas which are the main providers of Adult, Further and Vocational Education will need to be centrally involved as major stakeholders in the SDG process, particularly in view of the role and contribution vocational education makes to the delivery of so many of the SDGs, and so we would like to see this reflected in the final plan.

Youth work is also not specifically mentioned in this chapter, which is a significant oversight. Education and Training Boards (ETBs) have a legislative responsibility in relation to youth work in Ireland. This is set out in the Education and Training Boards Act, 2013¹⁶, which states that the functions of ETBs with regard to youth work are to: Support the provision, coordination, administration and assessment of youth work services in its functional area and provide such information as may be requested by the Minister for Children and Youth Affairs in relation to such support; and assess whether the manner in which it performs its functions is economical, efficient and effective (Education and Training Boards Act, Section 10(1)(j,k)). ETBs will need to be centrally involved in the SDGs rollout, monitoring and evaluation. We would welcome recognition of this in the final plan.

7.5.2: This section mentions further education in passing but deigns to elaborate upon the crucial role further education provides in terms of SDG progression while simultaneously emphasising the role of higher education. This risks producing a situation whereby higher education is perceived as more important than further, adult and community education in the mind of readers of the plan, and so in the final version we would expect an increased elaboration and emphasis on the importance of adult, community and further education.

7.5.2.1: The aforementioned prioritisation of higher education above other forms of education is paralleled here.

7.5.2.1: (ii) This subsection is numbered incorrectly. There is a statement that "it is envisaged that a higher education section will be developed" on the Geohive, but this is not made an explicit commitment in the related actions, and we would like to see this clearly committed to in the final plan.

¹⁵ <https://www.uil.unesco.org/en>

¹⁶ <https://www.irishstatutebook.ie/eli/2013/act/11/enacted/en/html>

In terms of the case study from UCC, we would like to see a government commitment to supporting the improvement and roll-out of this toolkit, as well as a link to the toolkit included in the case study.

9. Leverage our leadership and reputation at EU and international levels

Ireland has a significant and positive reputation on the European and international stages regarding human rights, our official development assistance (ODA), not to mention our role in co-negotiating the SDGs in 2015. It is our view that the final National Implementation Plan on the SDGs should make use of Ireland's international and EU clout to encourage other countries to keep on track with reporting, and ensure the SDGs are not ignored because of other issues on the international agenda.

Ireland's whole-of-Government approach to Agenda 2030 should welcome the inter-departmental coordination to ensure that the state's commitments to the international communities are equally reflected into the National Implemental Plan, as they are not mutually exclusive to each other. A siloed approach to addressing international development risks hindering the greater objective of Global Citizenship Education (GCE) as well as it would further compartmentalise Ireland's role in international development.

1.6: Ireland's leadership at the Security Council is commendable. This could be continued even beyond its term, due to the country's lived experience in peace building and its commitment towards promoting the rights of people with disabilities, especially in the context of war and conflict. Resolution 2475¹⁷ (protection of people with disabilities in conflict) has been one of the top outcomes of Ireland's leadership. Ireland has ratified Convention on the Rights of Persons with Disabilities (CPRD)¹⁸ and Article 11 of the CRPD, which has been further extended as UN Security Council Resolution 2475 re-emphasising the need for the states to ensure the protection of people with disabilities in war and conflict. Ireland should invest in the areas of training UN peacekeepers, to ensure inclusive peacekeeping and influence its allies and counterparts, and this should be demonstrated in the final plan.

We would also welcome greater engagement with UN Security Resolution 2250¹⁹ and related resolutions on Youth, Peace and Security.

1.6: The draft Plan did not mention UNCRPD. Article 32 of the treaty is about International Development and Article 11 calls for inclusive humanitarian action. Inclusion of persons with disabilities and their organisations (OPDs) is a mandate of the government in pre-during-post

¹⁷ <https://www.un.org/press/en/2019/sc13851.doc.htm>

¹⁸

<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>

¹⁹ <https://www.un.org/youthenvoy/tag/resolution-2250/>

humanitarian situations, while the government responds to both domestic and international actions. This should be remedied in the final plan given the unequivocal human rights foundations of the SDGs.

In general, methods for greater engagement should consider engagements with the organisations of people with disabilities (OPDs), which requires a strategy and action plan to engage with the organisations in both domestic and international contexts. What's more, we would like to see a commitment to greater and targeted participation of persons with disabilities in climate action e.g. National Youth Assembly on Climate, EU Youth Dialogue (Young Voices), etc. must be considered not just as a ritual, but as a mandate of the government.

In terms of future policies (Chapter 9), a successor Youth policy framework following on from Better Outcomes Brighter Futures should include a focus on the SDGs as well as on youth affairs and participatory approach ensuring the voice, opinions, experience and meaningful engagement of children and youth with disabilities and other minority groups are reflected into the policy.

10. Include specific details of the communications plan which will be employed to tell the public about the plan, and the data collection which will inform it

In order for the public to get behind this plan, it requires a well resourced communications and marketing plan. We note that currently, the Minister for the Department which houses the SDG Unit is also the Minister for Communications and we would strongly suggest that this advantage is exploited fully. A public awareness campaign through media channels at local and national level – on and offline – outlining the benefits, challenges, and opportunities of achieving the SDGs at personal, local, national, and global levels, should be included in the final plan. What's more, a specific youth awareness and online social media campaign should be put in place.

The SDG data geohive remains the best way for the public to obtain data; however this resource is unknown by many. This ties into point 2 above on resourcing. In order to communicate this plan and progress, an SDG Communications team is required at the very least. Additionally a commitment to public communication on the SDGs, informed by timely and comprehensive data collection is compromised and unlikely when indicators remain outdated and officials and local authorities are uninformed in the area of SDGs so clarity around the role of the CSO and the SDG-DGB would be welcome.

Linking into point 7 above, we strongly suggest that information on the SDGs is made accessible and easy-to use by diverse communities of persons with disabilities.

Additionally, we would like clarity regarding the frequency of market research which should be conducted regularly to assess impact of work. We would also like to see more details on how this research was conducted; sample size, gender breakdown, age breakdown, the company tasked with carrying out the data etc. as currently there is no source associated with the data.

Finally, further elaboration of the roles and responsibilities of all stakeholders around implementation is needed. A targeted campaign that sets out the vision and value of an SDG approach for all sectors needs to be rolled out as a matter of urgency.

11. Strengthen the section on Youth

7.4: Young people should be recognised as an equal stakeholder in the report. In that vein 7.4 should be enhanced from its current draft. This could include recommendations for future work such as surveys similar to what was undertaken in 2018 which was followed by a report on young people and the SDGs - Generation For Change UN Youth Delegates Report - National Youth Council of Ireland²⁰.

The role that youth organisations are playing in terms of educating about and empowering young people to take action on the SDGs is missing from the current text. There is an online map of SDG and Global Youth Work provision by youth organisations and higher education institutions that provides a good example of work already underway²¹ - Interactive map: Global Youth Work and the SDGs in the Irish Youth Sector - National Youth Council of Ireland - which could be included in the final plan .

7.4.2: In terms of the youth strategies that will inform work on SDGs in youth, we request that in addition to the EU Youth Strategy 2019-2027 and the Council of Europe Youth Sector Strategy, that the EU Youth Dialogue and the Reinforced Youth Guarantee - The reinforced Youth Guarantee - Employment, Social Affairs & Inclusion - European Commission (europa.eu)²² - be also included in the relevant paragraph.

We welcome the impetus to situate the work of the Youth Assemblies within the framework of Agenda 2030 but we would like to see a clear commitment and mechanism to employ Agenda 2030 as a *framework* for the Youth Assemblies, rather than Agenda 2030 being mapped onto the work on the Youth Assemblies post idea-generation.

7.4.3: We remark that in this section, twice the phrase “it is intended to” is used, however only once there is a corresponding commitment to related actions. To remedy this, we would like to see a commitment to incorporate guidance on effective youth engagement practices into the SDG training courses and toolkits for civil servants. Local politicians and LA officers should be reflected in the related actions in the final plan.

On a general point, we wish to note that ‘young people’ as listed in the related actions in this subsection are not a homogeneous grouping and so targeted strategies for engagement in the

²⁰ <https://www.youth.ie/documents/generatioforchange-un-dels-report/>

²¹ <https://www.youth.ie/articles/interactive-map-of-development-education-and-the-sdgs-in-the-irish-youth-sector/>

²² <https://ec.europa.eu/social/main.jsp?catId=1079&langId=en>

final plan should recognise this reality which would reflect the narrative in 7.4.4. We would suggest working in partnership with youth organisations and the National Youth Council of Ireland who all have experience of working with different and targeted groups of young people.

12. Integrate our ODA commitments

We note that at no point in the draft is our commitment to reaching the target of a 0.7% Gross National Income (GNI) spend on Official Development Assistance (ODA) by 2030 referenced, even though it is a Programme for Government commitment, and the Minister for Foreign Affairs and the Minister for Overseas Aid has a significant role regarding SDG implementation.

Nor is our role on the Security Council mentioned. There is a dearth of integration between our actions in this plan and with legislation to which we are bound; for example human rights and environmental legislation regarding water quality.

We would also welcome more in depth discussion in the plan as to how Ireland's International Development Programme will support its partner countries to implement the SDGs and how it plans to reach the furthest behind first through its programming.

13. Link the actions to specific outcomes, and work backwards from 2030 and then 2024

Plans have outcomes, outputs, actors, targets and indicators; and they all need to be logically connected in a viable theory of change. The plan should begin with setting out where we want to be at the end of 2024, it should then work backwards to build the actions to bring us closer towards this vision (i.e. will awareness-raising actually bring us to where we need to be?). The actions listed should be tied to clear desired outcomes, and the monitoring and evaluation mechanisms that will be used to track progress should be evident.

This document, as a National Implementation Plan, should read like a plan of action for how we collectively get from A to B. For that to happen, B needs to be laid out clearly at the outset as a broad vision, and each action should have a very clear desired outcome attached to it, all of which feed upwards to help us reach B.

Conclusion

We were disappointed, albeit not surprised at the market research results laid out in this plan. Knowledge at the local leadership level is very poor; but this is a reflection on how seriously government is taking the SDGs. However despite low levels of understanding, there is complacency that results in the term SDG being included in policy and practice without an appreciation of the full and effective purpose and ambition of Agenda 2030 and its implementation; a situation that has been termed 'SDG-washing'.

However, halfway in, it's likely almost too late for some in local leadership to acknowledge they are still unsure as to the principles, targets and goals of the SDGs. We are aware that there is an acute need to continue to socialise the concept of Agenda 2030 at all levels - national, regional and local - but at the same time, this shouldn't come at the expense of progress on implementation, especially given we are almost at the halfway mark between agreement and achievement of the SDGs.

Our members welcome a draft, but are concerned at the lack of ambition. It is scant on detail, there are many placeholders, and it's not clear when the specific targets will come. Too many actions are at a baseline and it's replete with self-imposed roadblocks. Ambition without the framework for achievement is just setting up for failure and disappointment.

Overarchingly, we believe that this plan offers an opportunity to be bold, to be visionary, and to inspire. Ireland co-led the negotiation of Agenda 2030 along with Kenya, and the SDGs provide the only universally agreed and universally applicable framework for global evidence-based policy-making in this crucial decade - the Decade of Action. This document needs to demonstrate that boldness and that vision, as well as robust accountability measures in order to inspire all stakeholders to row in behind it over the next 8 years.

Coalition 2030 members are passionate and pragmatic about the capacity of Agenda 2030 to simultaneously address multiple convergent challenges if a unified, effectively resourced and coherent whole of government approach is embraced. A call to action, driven from the top and supported at all levels, is needed to ensure this opportunity is not missed and the benefits are realised across society, the economy and the environment. Now is the time for urgent accelerated action and meaningful authentic engagement with Agenda 2030, an Agenda for which we can have much national pride.

