

DoEHLG Statement of Strategy reflections

Comhar Sustainable Development Council welcomes the opportunity to give feedback to the Department of Environment, Heritage and Local Government (DoEHLG) on the Statement of Strategy for the period 2008-2010. We find it positive that the DoEHLG sets out in a public document the objectives and strategies for the next three years.

Sustainable development means organising our affairs such that our economy continues to compete successfully in global markets and gives employment to all who seek it, our pressure on the environment diminishes over time, and our social and family life is fulfilling and quality of life generally rises. It is the brief of Comhar Sustainable Development Council to advise government on policy.

In general Comhar SDC values the fact that the Statement of Strategy has been aligned with the Programme for Government, as this gives the strategy a particular relevance and emphasis. The consultation document provides an overview of the elements of the Statement of Strategy. One of these, "Environmental Analysis", is not described in detail in the document. This would need to be carried out in more depth or perhaps the section heading should be changed to "context". However an overview of the environmental situation could be provided using the EPA indicators, for example. Overall we find that the Strategy could be more forward thinking with vision for future society (i.w. post 2010) and including a strategy of how to get there

We have endeavoured to provide responses to the following questions included in the consultation document:

- Are there any new directions/themes from your organisation's perspective, which should be emphasised/prioritised in the Department's new Statement of Strategy?

No, the main themes have been included.

- Should any of the issue/themes identified be particularly prioritised or emphasised, and are there other issues/themes that should be addressed in the Environmental Analysis?

The Programme for Government agreed in June 2007 identified three key priorities for this term of government.

"Areas of particular importance include:

- *Rolling out infrastructure nationwide,*
- *Combating climate change, and*
- *Delivering a fully modern, patient-centred health service."*

As a result climate change mitigation and adaptation will need to be given particular emphasis in the Department's work programme from 2008-2012, since DoEHLG is the Department responsible for climate change. Policy design and implementation in this area will be very important in light of the statement that "the Government will set a target for this administration of a reduction of 3% per year on average in our greenhouse gas emissions". This will mean that all investment in infrastructure and other programmes will need to be carefully carbon-proofed before implementation.

Comhar SDC has made recommendations to the OECD review of the Irish public sector on programme design and implementation.

In terms of programme design Comhar SDC recommends that:

- Identify key priorities
- Mobilise and manage technical skills (engineering, ecology etc) in the relevant programme area, together with skills in economics, law, administration and management.
- Identify the broad public interest to be served, including the market failures to be addressed.
- Marshall evidence nationally and internationally to map out options and their implications in terms of capital and operating costs, the incentives the policy provides to key stakeholders, expected outcomes, sustainability, implementation mechanisms.
- Understand how the various policy instruments – information and education, regulation (command and control), direct investment, subsidies, market based (levies charge and taxes, trading), research and development – can be mobilised and what their effects are likely to be singly and in combination.
- Where the involvement and commitment of more than one government department is desirable and necessary, to have clear and effective mechanisms for interaction and decision. Identifying and evaluating the "spillover" effects – e.g. greenhouse gas emissions – associated with policy choices is important if these external effects are to be systematically reflected in discussion of options.
- Engage with the political leadership, key stakeholders and – crucially – the general public in identifying the feasibility and attractiveness and support for alternatives.
- Identify the optimum delivery agency (ies) and modalities.
- Secure a decision by government

Recommendations

Identify cases of excellence in Irish policy design (Examples in the sustainability area include the plastics bag levy, and Greener Homes) and the converse, and what lessons can be yielded from national experience.

Identify best practise internationally as regards optimal skill base for policy formulation, and how it should be recruited, how to understand and mobilise policy instruments, achieve effective governance across government departments, and communicate in a coherent and timely fashion and what changes are needed in the Irish system to meet these standards.

Programme implementation: Performance in Ireland is very uneven, ranging from excellent to the opposite.

- Public infrastructure delivery: An important positive initiative has been the creation of an envelope for large-scale investment, where unexpended funds can be carried forward, and vice versa. In some areas, e.g. national roads construction, this has allowed such a widening of the scope and scale on investment that international competition has been facilitated and unit costs have been controlled. In other areas – perhaps provision of wastewater infrastructure – the same economies of scope and scale are not evident.

- Government agencies: Where agencies have clarity about what they have to deliver, understand the purpose and importance of mission in regard to meeting the public interest, and where they can mobilise the necessary skills and other resources to do the job, and operate without political or administrative interference, they tend to deliver. Where any of these conditions do not apply, they do not. There is also an issue of governance as regards the boards of agencies – what should be their responsibilities in the context of their ‘parent’ department, the public interest, the Minister, and the Oireachtas?
- Cross-agency and cross-departmental linkages: When a policy initiative involves two or more departments and/or agencies, it is important that it is clearly decided who pays, who decides, and who is responsible etc. There are interesting and positive examples of bottom up inter-agency collaboration, e.g. in research between EPA, Marine Institute and Sustainable Energy Ireland, which are especially important and notable for advancing the sustainability agenda.
- Integration between different programmes: One example of non-integration in this area: The National Spatial Strategy is an important first step towards the development of a long-term framework for balanced regional development, but the alignment between investment priorities, e.g. under the National Development Plan, with implementation of the National Spatial Strategy, is opaque.
- How can cross-cutting issues, such as those outlined below, be best addressed by all key stakeholders in the public and private sectors?
 - environmental sustainability (in particular our response to climate change; strengthened environmental services such as water/wastewater and waste management infrastructure);
 - regional development (in particular delivery of National Spatial Strategy and NDP commitments);
 - social inclusion and building of sustainable communities;
 - local government reform.

Sustainable development is a multi-dimensional process incorporating economic, social and environmental objectives and can only be successfully delivered through direct participative governance and cross-sectoral partnerships. Irish policymaking seems to struggle with finding the balance between talk and action, ranging between endless discussion and no action, to action with limited or no participation or discussion. It is a defensible hypothesis that in Ireland – and probably elsewhere – interdepartmental committees are the graveyard for policy. To the extent that this is true, it is a huge challenge for the sustainability agenda, which involves many different departments and agencies; working effectively to a shared agenda is crucial to success. There are initiatives to address this problem, including creation of cabinet sub committees, the identification of ‘lead departments’ and the linkage of objective achievement with national policy. However, these initiatives are embryonic, without a clear and agreed national policy as to how interdepartmental conflicts will be resolved, and the tendency still to give veto power to all parties in the interdepartmental committee. It would be a very useful exercise for DoEHLG to identify cases of success and failure in this domain, and to identify best practise internationally in moving forward.

Effective communication, including the gathering and dissemination of information, is crucial. Two situations are evident. First, some data are gathered at taxpayer expense but are not readily accessible for analysis. Second, in many areas gaps exist and it is therefore difficult to carry out the ex-ante and ex-post analyses needed to implement evidence-based policy. Another dimension of information is its dissemination so that consumers and businesses can make informed and rational choices.

The interface between national and local government is also crucial for the sustainability agenda. Local government (authorities) in the Irish system have central responsibilities for delivery of water supply and waste water and solid waste infrastructure and management – but with a high degree of central government control on capital funding – and land use planning and associated permission to develop. These are all crucial responsibilities are regards advancing a sustainability agenda. The Environment Fund could support additional staffing resources in the Local Agenda service, e.g. biodiversity officers and Local Agenda 21/ local sustainability officers supporting the delivery of sustainable development at local and regional level.

There following issues are germane:

When local government are given tasks by national government, failure to deliver is inevitably justified on the basis that the resources were not delivered to do the job. There appear to be no sanctions to punish lack of performance, or rewards to encourage and incentivise those who do deliver excellence.

There is also the issue of scale and scope – does local government have the technical and managerial capacities to deliver on both its own agenda, and that delegated by the national government, and does this vary across local authorities? If there is a skill deficit at national government, we would expect this problem to be compounded at local level.

The role of regional authorities – which have close to zero resources or executive authority - and whether or not they could overcome the scale and scope challenges?

River basins are *a priori* an obvious institutional template for addressing the challenges of water management and adjusting to more intense weather events and associated flooding and drought periods associated with climate change. There are pilot schemes focused on river basins, but no move towards delegation of decisions to this level.

Overall the mandate of local government in Ireland needs to be examined as to whether it has the structures, scale and scope to deliver, and what changes, including regionalisation, clustering, etc - if any would be necessary in this regard. In particular, the pre-requisites in this regard needed to deliver the sustainability agenda should be identified.

Mission Statement

The main objective is to be leader for sustainable development in government - this could mean the coordination of activities where relevant across departments and provide expert advice on sustainable development initiatives for other departments (unless Dept of Taoiseach or finance takes this role).

Some specific points on the Appendix:

1. Environment and climate change
 - High level objective – more than “promote” protection of the environment, “ensure”; mention SEAs?
 - Key strategies: more than “promote” integration of sustainable dev in sectoral policies – would “oversee” be better?
 - Mention monitoring role of department
 - Describe process needed to work with other departments? At least mention other departments.

2. Water
 - Include climate change issue and plan for adaptation for water.

3. Built heritage and planning
 - Rearrange priorities- 1. good planning, i.e. land use/ transport (DoT)/ local government; 2. good quality buildings (work with DCNR); 3. archaeology and heritage

4. Local government
 - key is to implement national policy in coordinated manner
 - make sure resources are available for sustainability issues, i.e. the Environment Fund could support additional staffing resources in the Local Agenda service, e.g. biodiversity officers and Local Agenda 21/ local sustainability officers supporting the delivery of sustainable development at local and regional level.

5. Housing
 - lead by example in provision of social and affordable housing- sustainable buildings, good planning, coordinated l.g.

6. Resourcing and modernising the department
 - More radical ideas needed?