IDEA submission on

Ireland's Second National Implementation Plan (NIP) on the Sustainable Development Goals (SDGs)

2022- 2024

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IDEA, the Irish Development Education Association, is the national network for Development Education in Ireland and a leading voice for the sector. We represent over 80 members involved in the practice, promotion and advancement of Global Citizenship Education (GCE) in formal, non-formal and informal settings. Together we work to strengthen GCE in Ireland and to raise awareness of the crucial it plays in achieving an equal, just and sustainable future.

IDEA welcomes the opportunity to comment on the Draft NIP.

We wish to state at the outset that we strongly support the submissions from the National Youth Council of Ireland (NYCI) and Coalition 2030 to the Sustainable Development Goals National Implementation Plan (2022-24).

General Comments

1. While welcoming the opportunity to contribute to the National Implementation Plan, we wish to voice our concern at the short timescale we had to consult with our members to make this submission. We were also disappointed that the Stakeholder Forum was a virtual event, and that no in-person event was possible prior to the submission deadline.

   We also note that the document circulated was not paginated and we would request that this be considered in future as it would be much easier to reference sections.

2. Ireland has been a global leader in the development of the SDGs, and we believe Ireland must continue this leadership in the implementation of the Goals. Mid-way through the SDG process, we are concerned that Ireland has not made significant progress since the 2018 review. Indeed, many of the recommendations from that Review remain relevant. We understand that the challenges and constraints caused by Covid-19 over the past two years may have hampered our progress, yet progress remains significantly behind where it needs to be in order to achieve the SDGs by 2030. There is a significant risk that the SDGs will fail to be achieved by 2030. Ireland led the UN in establishing the Goals. As a state, we must lead, and be seen to be leading, in implementing ambitious actions to achieve the Goals.

3. There is now a need for a renewed focus on creating a 'Just Recovery' from the effects of Covid-19 and ensuring those hit hardest and those with marginalised voices are recognised and in line with the key message of "Leave no-one behind" which our Ambassador highlighted at the recent Stakeholder Forum was a key request from the Irish Drafting Team.

   Considerable work remains to be done if Ireland is to be viewed as a leader in the implementation of the goals.

4. We welcome the "whole-of -society" approach to the SDGs and also the commitment to a "whole of government approach" outlined in the Plan. However, we believe that the Plan needs to be much more ambitious and action oriented if this is to be realised.

5. While we agree that the lack of awareness of the SDGs among the general public is cause for concern, we are extremely alarmed at the lack of awareness/knowledge of the SDGs in Government Departments, State Agencies and Local Authorities and that high-ranking officials seem oblivious to their responsibility in the delivery/implementation of the SDGs.

Until the official institutions of the State stand up to the plate to take and accept responsibility for implementation and delivery of the SDGs, it is disingenuous to put blame on individuals for their lack of awareness or action.

6. The role of education, and in particular Global Citizenship Education, for a deeper public engagement and participation with the SDGs to achieve the ambition of this plan should be incorporated into the objectives and proposals for implementation of the plan. Awareness alone will not ensure public participation in the SDGs. That requires a comprehensive public education strategy with a focus on SDG action. This needs to be delivered through formal, non-formal and informal education. We would like to see a stronger focus on non-formal education as highlighted in the National Youth Council of Ireland submission.

7. Much of what is in the current plan is descriptive of ongoing activities within Government Departments and State Agencies. The Plan maps SDGs against current policies rather than use the SDGs to shape and inform policy. While the proposal to align Departments' budget spends against the SDGs is a step in the right direction and marks progress, we believe that the SDGs should determine budgetary priorities.

8. There is a need for a clear plan on resourcing the implementation and coordination of this plan. Hence, we believe that there should be a specific commitment to providing additional budget for SDG implementation. There should also be a commitment to prioritising SDG related activity in the annual National Budget as well as in departmental budgets. We note that the SDG unit within DECC is under-resourced and commend the work done by the staff in difficult circumstances. This situation should not be allowed to continue. We further support the Coalition 2030 call for the SDG Implementation Unit to be housed within the Department of the Taoiseach with sufficient resources to carry out its task effectively.

9. We reiterate our call in previous submissions on the need for a strong public education programme to develop awareness and understanding of the SDGs. We support the call in the NYCI Submission for national conversation on what "leave no one behind" actually means to us.

Section Specific Comments

1. Introduction

We welcome the five Strategic Objectives set out in the Plan. The achievement of these objectives would go a long way towards the ultimate delivery and implementation of the goals. We would have some concerns that the actions set out in the plan are not sufficiently robust to deliver these objectives.

In terms of Ireland's international approach to the SDGs (section 1.6) we would like to see the Plan state its commitment to reaching 0.7% of GDP in Overseas Development Aid specifically referenced in the Plan. Given the role of the DFA in the co-ordination and implementation of the plan we believe such a commitment to be a *sine qua non* of Ireland's implementation plan.

2. Implementation

We note a reference to "bespoke engagement mechanisms have been sought specifically from the business, education and youth sectors" (p. 28). These mechanisms not elucidated at this point – nor do they appear to be in the business, education and youth sections of chapter 7. Further information on these mechanisms would be very welcome.

We commend the NIP Team for undertaking the market research which highlights the mammoth task in promoting awareness of the SDGs (Chapter two). However, the focus of this market research on the public's ignorance of the SDGs misses the bigger picture. The more concerning aspect of this research is the lack of knowledge and understanding of the SDGs among senior officials in State Agencies, Government Departments and Local Authorities. What is needed for implementation and delivery of the SDGs is state leadership. Individual action will follow if the leadership and policies create the conditions for this to happen.

3. Governance & Coordination

The commitment at the National Stakeholder Forum on 2nd June to publish the names of all members of the Senior Officials Group (SOG) and Inter-Departmental Working Group (IDWG) is welcome. However, we note that this commitment is not mentioned in the current draft and should be explicitly committed to in the final plan.

Moreover, we would echo the C2030 request that the IDWG's Terms of Reference, be developed with Stakeholders including civil society, business, youth and education.

A number of suggestions are mooted in relation to the establishment of a specific Oireachtas Committee or a commitment to an enhanced role for the Oireachtas regarding reporting, but there are no specific commitments in relation to either of these suggestions. We agree with C2030 that 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.

Furthermore, we believe all policy/legislative proposals to be SDG-proofed before being advanced/enacted. We would support the call from C2030 for a Minister for Policy Coherence in Ireland, something which already exists in Scotland.

4. Embedding SDGs in Government Departments

We welcome the commitment to embedding the SDGs into the work of Government Departments and for greater policy coherence for sustainable development (Chapter 4). It is disappointing that mid-way through the SDG process we are such a long way from this point, notwithstanding the impact the COVID-19 pandemic had on progressing SDG implementation.

We fully support the call by Coalition 2030 for SDG implementation to be brought under the Department of the Taoiseach. The draft plan provides for a dedicated lead Government Department to be held accountable for achieving particular SDG targets and this should be the Department of the Taoiseach. Such a move would ensure greater political backing, buy-in across all other departments, and increased policy coherence for sustainable development across Government.

5. Local Authorities

IDEA believes that Local Authorities play a pivotal role in the implementation of the Goals and the creation of communities of learning for sustainable development. As pointed out in the Coalition 2030 submission, local government is the way forward for up to 60% of the implementation of the SDGs, but local government is not being driven to do the necessary work to progress the SDGs.

In recent months IDEA has been supporting Saolta in their work with PPNs and Councillors on the SDGs and the role of Global Citizenship Education. With Saolta we have provided inputs at Association of Irish Local Government (AILG) training seminars for Councillors on the Sustainable Development Goals. It is disappointing that Chapter 5 makes no reference to the role of the elected Councillors who are responsible for setting Council policy. Moreover, there is no reference to the Councillors' representative body the Association of Irish Local Government which organises training seminars for the elected members. The development of training networks and knowledge shares through the AILG network could be added to Action 27.

We welcome the proposal to ensure that Local Authorities have the SDGs embedded in all significant programmes and policies including Development Plans, Corporate Plans, Local Community Development Plans and foresee a role for PPNs. We note that it is already too late for many County and City Development Plans which have been adopted over the past year and will run from 2022 to 2028 (with just two years to 2030). Surprisingly few of the recently adopted Development Plans make commitments to work towards the implementation of the SDGs or contain more than a passing reference to the SDGs. We would support Coalition 2030's call for a mechanism to hold Local Authorities accountable for incorporating the SDGs in terms of using the SDGs as a tool for policy-making in Corporate and County Development Plans.

We would like to see in the final National Implementation Plan, a commitment that each City/County Development Plan will include policy objectives to work towards the achievement of the SDGs and for each Council to work Public Participation Networks in educating and communicating how local businesses, communities and individuals can work towards the achievement of the UN Sustainable Development Goals by 2030 and in supporting initiatives on education for sustainable development.

We note that the Dublin City Corporate Plan is cited as an example of Good Practice and we welcome the comprehensive commitments to the SDGs in this Plan. IDEA had made a submission requesting the City Council to make a commitment to work towards the attainment of the SDGs and to have a policy of engagement with the PPNs for education programmes on the SDGs. The Chief Executive's response was that the SDGs are dealt with adequately in the Corporate Plan which is disappointing. We would also point out that the Cork City Development Plan which has been adopted is another example of good practice where the SDGs have been embedded into each chapter of the Plan.

We welcome the proposal to support Local Voluntary Reviews. We point to the example of Bristol as an example of good practice of Local Voluntary Reviews and note that this review was done in partnership with Bristol University[1]. This section would benefit from action points committing to a process of VLRs with a number of Local Authorities.

6. National Stakeholder Engagement

We believe this section needs to include a reference to the role education, and in particular Global Citizenship Education, for a deeper public engagement and participation with the SDGs to achieve the ambition of this plan. To ensure public participation, activities outlined in this section must go beyond the national SDG Champions, the online platform, Geohive, and SDG newsletter, to include a comprehensive over-arching public education and engagement strategy with corresponding actions focussing on public education and public participation in the SDGs. Awareness alone will not ensure public participation in the SDGs. It requires public education and a comprehensive public education strategy with a focus on SDG action

The need to improve stakeholder engagement is acknowledged. However, there is no indication as to why that conclusion has been drawn and no concrete examples as to how it will be addressed going forward. We agree with Coalition 2030's call for a clear map of plans for engaging the nine major groups should be included in the report. Active outreach and funding to enable marginalised groups to participate is essential.

7. Sectoral Stakeholder Engagement

Section 7.1: Business

SDG 8 is for "Decent Work and Economic Growth". Yet in this section there is an over-emphasis on business and economic growth and little attention is given to Decent Work. The role of the trade union movement has been largely ignored (there is no reference to Trade Unions in this section at all). Trade unions play a hugely important role in education and training activities for their members and should be harnessed to support a broad SDG education campaign (as we have highlighted in previous chapters – a public education rather than a just communications campaign is necessary).

7.2 Civil Society

The section on civil society has a strong focus on Local Community Development Committees and the PPNs. While these are important civil society actors, there is little reference to many other civil society groups and networks working in this space. Much of what has been outlined

[1] Bristol Voluntary Local Review

in this section describes activities currently taking place and the actions proposed are either for the development toolkits or to measure activities. The actions lack clear recommendations/indicators.

7.3 – Libraries

The inclusion of public libraries as a key stakeholder is particularly welcome. Libraries are referenced only in terms of SDG16.10 (access to information). We believe that libraries play a key role in SDG 4, particularly SDG 4.7:

"By 2030 ensure all learners acquire knowledge and skills needed to promote sustainable development, including among others through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship, and appreciation of cultural diversity and of culture's contribution to sustainable development"

Dublin Cork and Limerick are UNESCO Learning Cities, and the libraries play a seminal role in creating learning communities. We would recommend referencing the UNESCO learning cities in Ireland in this section.

7.4 Youth

We fully support the submission by the National Youth Council of Ireland on the Youth section of the Plan and believe that this should be considerably strengthened. We fully agree that the important role youth organisations play in educating and empowering young people to take action is missing from the current text.

We are concerned that young people are not being recognised as an equal stakeholder in this plan. The development of strong partnerships between national and local government and young people is pivotal to ensuring young people have meaningful participation to effect the kind of change required to achieve the ambitions of this plan and the implementation of Agenda 2030.

We believe that the plan should contain more concrete commitments. We note that the expression "it is intended" is used in relation to youth actions (7.4.3) and would ask that the language be more definite. We support the NYCI's call for guidance on youth engagement practices in the SDG training courses/toolkits for civil servants and Local Authority officials in the final plan.

We would also point out that 'young people' as listed in the related actions in this subsection are not a homogeneous grouping which should be recognised in the final plan.

7.5 Education

IDEA believes that to achieve the level of public engagement and involvement in the SDGs envisaged by the NIP, a broader public education and outreach plan is essential. This needs to be delivered through formal, non-formal and informal education. Ireland has a very strong track record in this area, and IDEA's work in Global Citizenship Education has been acknowledged internationally. This gives Ireland an untapped strength to enable us to make the SDGs a whole of society achievement.

There should be an emphasis on public understanding of the SDGs and engagement with the

SDGs. For example, all references to raising public awareness should also include education, public participation, understanding and engagement. There should be a refocusing from communications only to a 'public awareness, education and engagement strategy'.

The section on education needs further attention and to be strengthened considerably. Education is not only an SDG in its own right – SDG4 Quality Education- but is an enabler of all other SDGs. In that context it is disappointing that there is no specific reference to SDG4.7:

"By 2030 ensure all learners acquire knowledge and skills needed to promote sustainable development, including among others through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship, and appreciation of cultural diversity and of culture's contribution to sustainable development"

The section on Education has just two sections: 1) Collaboration for SDGs through the National Strategy for Education for Sustainable Development (which has yet to be published) and the Global Citizenship Education Strategy and 2) Further and Higher Education.

We welcome the inclusion of the Education for Sustainable Development and Global Citizenship Education strategies and the recognition of the contribution they make to the implementation of the SDGs. However, we believe that the SDG National Implementation Plan needs to be more ambitious than just referencing plans that are already in place. In addition, there are no actions associated with this section of the Education chapter which is not acceptable and will need to be remedied. Moreover, we understand that the National Strategy for Education for Sustainable Development will not attract any new funding but will rather be dependent on existing funding to be channelled into the proposed activities. If that is the case, then depending on the National Strategy for Education for Sustainable Development to deliver the education objectives for the SDGs seems overly ambitious.

There is a strong focus on the formal education sector in this chapter – each of the case studies represents a formal education institution. Even where environmental and youth organisations are referenced it is only in the context of work they are doing with schools and higher education organisations. Public Education through formal, non-formal and informal education is essential to the achievement of the SDGs. The NIPs education must go beyond formal education to include non-formal and informal education.

A serious omission in the Education section is the absence of any reference to Adult and Community Education.

The Section entitled Higher and Further Education references only Higher Education in the body of the text. There is no reference to further Education and Training. There is no reference to the role of the ETBs or Solas in the way that the HEIs are referenced. Yet Further Education and Training will be central to the delivery of many aspects of the SDGs, particularly in terms of skills development and upskilling in various aspects of the "green economy" e.g. retrofitting. We would welcome recognition of this in the final plan.

The actions in the Higher Education section are currently "placeholders" until the National Strategy for Education for Sustainable Development is published.

Conclusion

Coming towards the mid-way point of the SDGs (2015-2030) there is need for renewed sense of urgency in the achievement of Agenda 2030. We believe that education must be at the heart of the plan.

The Global Citizenship Education Sector is ready to step up to the plate and play our part in achieving the ambitious targets of the Sustainable Development Goals.

We hope that the National Implementation Plan will reflect and facilitate the ideas and energy we can bring to the table on this and request that you take our submission into consideration.