These hopes can only be realised if we stay true to the commitments we made to one another in the last months of 2015. This will require a convergence of vision between the institutions of the United Nations, the Member States, organisations of regional co-operation, and, if we are to be serious about reforming the global economy, the Bretton Woods Institutions, including the World Trade Organisation.

It is authenticity of the word, respect for diversity, gender equality, equality in all its forms - these are the gifts our world needs. (2018)

Michael D. Higgins
President of Ireland

With thanks to members of Coalition2030 for their input into the content and format of this report and a sincere thanks to the author of this report on behalf of the coalition, Luke Holland.
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INTRODUCTION

International solidarity and social justice have long been core elements of Ireland’s national identity. Having taken a leading role in the negotiations of the Sustainable Development Goals (SDGs), the country has a duty to act vigorously and decisively at both the domestic and international levels to ensure the promise of Agenda 2030 is fulfilled.

Ireland has been slow in getting to grips with implementation of the SDGs, however. Having just published its first National Implementation Plan - a two-year interim framework that comes almost three years after the SDGs were agreed - the country must dramatically strengthen its commitment to the Agenda and accelerate progress in implementation.

The first section of this report - ‘General Reflections and Key Concerns’ - sets out some of the most pressing issues with regard to Ireland’s SDG performance from the standpoint of Coalition 2030. Chief among these are the weaknesses in Ireland’s recently-published National Implementation Plan; its poor performance in meeting commitments on overseas development aid (ODA); its continuing facilitation of international tax abuse; and extremely worrying trends in greenhouse gas emissions.

Following this, individual sections on each of the 17 SDGs analyse Ireland’s performance to date. Each of these chapters sets out existing policy commitments corresponding to the Goal in question, along with recent trends in relevant targets and indicators, before providing a set of actionable recommendations that, if implemented, would serve to ensure achievement. Many of the sections also include separate textboxes on international issues where Ireland’s engagement through its bilateral relations and the institutions of international governance may be serving to significantly support or impede progress towards the SDGs in other countries.

Coalition 2030 is an alliance of over 100 civil society organisations working together to ensure Ireland keeps its promise to achieve the SDGs both at home and abroad. The Coalition is made up of both international and domestic NGOs along with youth organisations, environmental groups, academics, and trade unions. Its member organisations work in a broad variety of areas – from humanitarian relief to labour rights and environmental sustainability – in Ireland and in over 50 countries around the world.
IRELAND’S IMPLEMENTATION OF AGENDA 2030: GENERAL REFLECTIONS AND KEY CONCERNS

Ireland as a nation has long prided itself on its commitment to sustainable development and international solidarity. This ethos was reaffirmed in the leadership role Ireland took in co-chairing, with Kenya, the negotiations of Agenda 2030. In recent years, measures deployed to tackle the country’s economic crisis, together with lacklustre implementation of environmental plans and policies, have substantially undermined its faithfulness to these principles, however, fueling a variety of retrogressive trends at both the domestic and international levels.

Coalition 2030, which comprises over 100 civil society organisations advocating for full implementation of the Sustainable Development Goals (SDGs), has identified several key issues that warrant particular attention with regard to Ireland’s implementation of the SDGs. This report is not intended to cover every target and indicator. Rather it reflects the insights and assessments of Coalition 2030 members, working on many of the critical elements of this Agenda 2030.

National Implementation Plan

Ireland’s National Implementation Plan for the SDGs 2018-2020\(^1\) (NIP), released on 26 April 2018, marks a key step in the integration of the SDGs into Irish policy. The emphasis in the NIP on Ireland’s leadership on SDG implementation at home and abroad is to be welcomed, as is the recognition of the key role of government in delivering progress. Also welcome is the NIP’s inclusion of a SDG Policy Map and a Matrix of Lead and Stakeholder Departments. The Plan also includes important actions to embed SDGs into domestic frameworks in a transparent fashion, such as tagging within Irish Aid budget lines, as well as the need for sectoral mainstreaming and integration of SDGs into departmental reporting.

The NIP was published two and a half years after the agreement of Agenda 2030. It is important to note that little time was provided for Irish civil society to fully engage with the plan in advance of Ireland’s first Voluntary National Review before the High-Level Political Forum on Sustainable Development (HLPF). Furthermore, civil society was given limited opportunity to input into the plan during its formulation. While there is much to be welcomed in the NIP, there are also serious deficits that risk undermining Ireland’s achievement of the SDGs at both national and international levels.

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Most of the 19 high-level actions detailed in the NIP do not provide detail on exactly how Ireland will achieve its commitments under the SDGs. The NIP therefore constitutes more a framework for implementation than an implementation plan. Moreover, it is concerning that the plan only covers the period 2018 to 2020, with a promise to deliver another SDG implementation plan by the time this initial one expires. The plan also lacks tangible, time-bound targets based on Ireland’s current situation together with a roadmap for how these targets will be achieved between now and 2030. Given the critical importance of long-term planning to achieve the societal transformation promised in Agenda 2030, this lack of commitment to a long-term vision and a sustained programme of implementation is disappointing.

Furthermore, the key political principle of leaving no one behind is not fully incorporated as an overarching target and ambition. The NIP, despite numerous references to “the most vulnerable”, does not provide any detail on how groups such as lone-parent families, migrants, women, persons with disabilities, young people, Travellers, those experiencing extreme poverty, and members of the LGBTQI+ community will be targeted for prioritisation in order to ensure they are not left behind in development processes.

National Action Plan

Coalition 2030 is also concerned that responsibility for leading the National Action Plan rests solely with the Department of Communications, Climate Action and the Environment, and does not provide for strong political engagement from the Department of the Taoiseach (Prime Minister). As such, the need for cross-departmental ownership is absent. If Ireland is to achieve the ‘whole of government approach’ to the SDGs that will be necessary for successful implementation, it is crucial that the Executive take the lead in ensuring full mainstreaming of SDG plans and policies across all government departments. Such leadership is equally important to foster a ‘whole of society’ approach to the SDGs, which will be necessary to bring Agenda 2030 to fruition. Similarly, strong leadership from the highest level of government is required to ensure Local Authorities across Ireland integrate SDG targets and indicators into city/county wide planning, including in County Development Plans, Local Economic and Community Plans and other strategies and plans in the years ahead.

Voluntary National Review (VNR)

It should likewise be noted that the government’s Voluntary National Review (VNR) report to the HLPF relies on comparisons with the EU28 nations to evaluate SDG progress. Given the significant differences in the economies and contexts of EU countries, it would be far more appropriate to make comparisons with the EU15 grouping only.

Moreover, much of the government’s report focuses on describing policies and plans of relevance to the implementation of the SDGs in Ireland and under many of the Goals, there is a notable lack of detail on the current status of corresponding targets and indicators, and crucially, of trends over time. It is also concerning that, despite several references to the impact of Ireland’s recent economic crisis on SDG targets and indicators, there is no mention of the role austerity policies, which shifted much of the burden of the crisis onto Ireland’s more vulnerable groups, played in exacerbating the effects of the crisis.²

²Center for Economic and Social Rights, 2012, Mauled by the Celtic Tiger: Human rights in Ireland’s economic meltdown.
Policy Coherence – from local to global

Arguably the greatest threat to Ireland’s implementation of the SDGs is a pronounced lack of policy coherence. This issue is particularly manifest in Ireland’s poor performance in reducing greenhouse gas emissions and its continuing role in facilitating aggressive tax planning by multinational companies.

Another area of immediate concern with regard to Ireland’s implementation of the SDGs is the continuing shortfall in budgetary allocations to overseas development aid (ODA). While it must be recognised that Ireland’s strategic prioritisation of Least Developed Countries (LDCs) in this arena coheres well with the promise to ‘leave no-one behind’, its fiscal commitment to ODA stood at just 0.3 percent of GNI in 2017, which is less than half of the 0.7 percent target agreed to by OECD nations in 2000 (see SDG 1, SDG 17).

GHG emissions have been increasing rapidly in Ireland with the economic recovery and the country is forecast to miss all reduction targets committed to under Europe 2020 plans (see SDG13).

Being mindful that the role of international tax avoidance in undermining sustainable development, particularly in the Global South, is widely recognised, Ireland’s fiscal policies are not compatible with its SDG commitments (see SDG13, SDG 17).

Although the government has taken steps to address the ‘Double Irish’ tax avoidance scheme, which facilitated the transfer of intellectual property royalties to tax havens in the Caribbean, this has now been replaced by the ‘Single Malt’, which enables companies to redirect profits to other states with which Ireland has double taxation agreements, but which do not impose any form of corporate tax.

Whole of society participation

Ireland’s SDG implementation is also hindered by a lack of space for meaningful civil society participation. The social partnership model, which underpinned policy design and implementation for decades in Ireland, was discontinued during the country’s economic crisis as a sustained austerity programme was imposed which severely exacerbated levels of inequality, long-term unemployment, and child poverty, reduced environmental protection and fuelled a plethora of other challenges for Irish society (see SDG 1, SDG 3, SDG 5, SDG 8, SDG 10, SDG 17). The National Implementation Plan pledged to establish a National Stakeholder Forum, the first meeting of which was recently held. This is welcome as a means of engaging civil society and other actors more deeply in the SDG process, but its mandate must be clarified, and it must facilitate robust rather than tokenistic participation.

Closely connected to this is the low level of awareness of the SDGs in Ireland. According to the most recent statistics from the European Commission, Ireland has among the lowest levels of awareness of the SDGs in Europe, with only 36 percent of respondents ever having heard of the Goals, as compared to 73 percent in Finland, 62 percent in Luxembourg and 61 percent in the Netherlands. This throws into stark relief the need for vigorous communications and educational efforts to foster awareness and ownership of the SDGs, as will be crucial to their realisation.

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An associated issue is the lack of accountability mechanisms for progress under each of the Goals. Given that international accountability provisions for Agenda 2030 are similarly limited, it is critically important that robust systems for monitoring and accountability are put in place at the domestic level. Ireland’s progress towards full implementation of Agenda 2030 will also be dependent on the provision of better quality, more frequent and fully disaggregated data across all of the SDGs. Although the Central Statistics Office has established a dedicated online portal for data relating to the SDGs, many of the SDG indicators are not covered and much of the information that is available is either out of date or insufficient to identify trends over time. This issue is particularly pronounced with regard to the environmental goals, for which many indicators have never been studied in Ireland. Data availability for the economic goals is somewhat stronger, but under the social goals poor disaggregation for sectors including migrants and the LGBTQI+ community effectively precludes effective civil society monitoring.

**Recommendations**

1. As part of the National SDGs Implementation Plan, the government, in consultation with the National Economic and Social Council, should strengthen a whole-of-government approach to the SDGs. To facilitate this, responsibility for oversight of SDG implementation should be transferred to the Office of the Taoiseach. The government should also take steps to ensure strong horizontal alignment between different levels of policymaking and implementation, vertical alignment with Local and Regional Authorities, and continuous monitoring.

2. A comprehensive education and communications plan is required to maximise awareness, ownership, and engagement by people in Ireland with the SDGs. Setting aside 3 percent of the proposed 0.7 percent GNI budget would facilitate Ireland to actively engage different sectors in society, as envisaged by the Irish Aid Development Education Strategic Plan and assist the Irish Government in delivering its SDG commitments.

3. The second National SDG Implementation Plan should be delivered by the end of 2019 with a longer-term vision extending to the full implementation of Agenda 2030 between 2020 and 2030. This should include ambitious targets, detailed implementation plans and clear timeframes across each of the 17 SDGs, as well as a lead department in relation to each action. Further information on what success would look like should also be provided.
4 The next NIP should also include a full stakeholder analysis, beyond a simple listing of key stakeholders. In this regard, the role of both domestic and international non-governmental organisations, along with union bodies, private sector actors, academic institutions, grassroots organisations and others warrants differentiation.

5 The next NIP should also include detailed plans to ensure that vulnerable groups such as women, young people, children, older persons, persons with disabilities and groups affected by poverty and/or marginalisation such as lone-parent families, Travellers, migrants and asylum-seekers, people facing addiction and/or mental health issues, people in homelessness, and members of the LGBTQI+ community, are targeted and prioritised in SDG implementation as well as in SDG ownership and participation. In order to ensure public participation in the development of the new plan, public scoping should commence at the latest in January 2019. A thoroughgoing cost analysis is also required to determine the levels and timeframes of resources that will be needed for SDG implementation.

6 The mandate of the National Stakeholder Forum on SDG Implementation should facilitate robust participation and bring with it adequate resources to allow it to fulfill this mandate. A full stakeholder analysis should also be undertaken as part of the NIP. Modalities of multi-stakeholder engagement should be detailed so as to ensure that it is timely, regular and meaningful. This should include clear timeframes to ensure recommendations are properly incorporated into government policy and mainstreamed across all relevant departments. Systems should be put in place requiring the government and/or state bodies to provide justification for non-implementation of NSF recommendations where this occurs. The government should also provide adequate resources for education and training around the country to facilitate engagement and participation at local level.

7 Ireland should also develop a transparent, well-resourced Policy Coherence for Development mechanism to identify and tackle inconsistencies such as relevant aspects of the country’s tax regime and greenhouse gas policies. The government, in close consultation with Irish Aid and civil society organisations, should also ensure policy coherence in its international relations, particularly with regard to fiscal policies, climate change policies, migration/refugees, peace, defence and trade.

8 Adequate resources should be provided to both the Central Statistics Office and civil society organisations to ensure frequent, high quality and fully disaggregated data is provided on all SDG indicators in the years ahead. This should include in-depth data on vulnerable groups and sectors that are not currently addressed by CSO statistics, and regularly updated data on relevant environmental indicators. In order to ensure the efficacy of this work, supplementary indicators should also be identified in consultation with civil society organisations.
END POVERTY IN ALL ITS FORMS EVERYWHERE

Ireland through its overseas aid programme has long led the way in supporting sustainable development in some of the poorest countries in the world. Indeed, Irish Aid’s strategic focus on what are termed the ‘Least Developed Countries’ (LDCs) and the most vulnerable populations within those countries has rightly earned praise from the OECD Development Assistance Committee (DAC). Ireland has been a staunch supporter of untied aid and has always had a strong commitment to Official Development Assistance (ODA) that is targeted solely at poverty alleviation and underpinned by respect for good donorship, accountability, human rights and transparency.

Achieving the SDGs requires greater prioritisation of the goals, based on a clear gaps analysis, and funding commitments across all Departments to ensure sufficient investment in the SDG National Implementation Plan. In particular, the Government needs to urgently publish a predictable, multi-year roadmap towards achieving 0.7 percent GNI budgetary allocation to overseas development aid, as this remains a clear gap. Ireland’s budgetary allocation to ODA remains far below the level OECD countries committed to in 2000. In 2017, ODA stood at 0.3 percent of GNI, which is less than half of the 0.7 percent commitment (Target 17.2). This is also significantly below the EU average of 0.5 percent of GNI in 2017.

Irish Aid also needs to set clearer indicators as to how it will succeed in leading on this agenda in its partner countries and on the international stage and as Irish Aid looks to support those who are the furthest left behind, it will be necessary to mindful of those living in Middle Income Countries (MICs) who suffer high levels of inequality and instability.

Ireland needs to urgently develop a transparent, well-resourced Policy Coherence for Sustainable Development mechanism to identify and tackle inconsistencies such as relevant aspects of the country’s tax regime and greenhouse gas policies. Another example would be to ensure policy coherence in its international relations, particularly with regard to fiscal policies, climate change policies, migration/refugees, peace, defence and trade.

Ireland’s approach to poverty reduction is set out in the National Action Plan for Social Inclusion (NAPS Inclusion), which set the target of reducing consistent poverty – meaning those who are both below the poverty line and experiencing material deprivation – to 4 percent by 2016 and 2 percent or less by 2020. A new National Action Plan for Social Inclusion, covering the period from 2018 to 2021 is due to be published later this year.

In 2017, nominal GDP per capita in Ireland was US $62,085, making it the 7th richest country in the world, while GDP at purchasing power parity was $72,529, placing it at number six in the global rankings.\(^6\) Despite this, the most recent data from Ireland’s Central Statistics Office shows that one in every six people in the country is at risk of poverty.\(^8\) This figure – reflecting some 780,000 people or 16.5 percent of the population – has not gone

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\(^{1}\)Target 17.2 Dedicate 0.7 per cent of ODA/GNI to developing countries and 0.15 to 0.20 per cent of ODA/GNI to least developed countries.


\(^{3}\)Poverty line set at 60 percent of median income, Central Statistics Office, 2017, Survey on Income Standards and Living Conditions.
down significantly in recent years despite the country’s economic recovery (Target 1.2).9 While recognising the impact of the recession on poverty levels, the government’s report to the High-Level Political Forum10 fails to acknowledge that this deterioration was largely caused by wide-ranging austerity policies that forced the burden of the downturn onto vulnerable sectors of Irish society that were least able to bear it.11

Rates of material deprivation, defined by the CSO as being forced to go without two or more of 11 basic necessities, stood at 21 percent in 2016 — around one million people. Consistent poverty in 2016 was 8.3 percent — more than double the target set. This corresponds to 393,900 people. Eurostat figures show that, although the proportion of Ireland’s population found to be at risk of poverty or social exclusion has improved from a peak of 30.2 percent in 2012, it remains very high, at 24.2 percent in 2016.12

Being mindful of the promise to “leave no-one behind” in sustainable development, it must also be noted that certain groups within Irish society continue to be particularly affected by high rates of poverty and marginalisation. Moreover, the government’s VNR report fails to address the poverty status of such groups directly in its assessment of SDG1.13

According to CSO data, almost 40 percent of persons unable to work due to illness or disability are at risk of poverty. While this figure is down from the peak of 66.5 percent in 2001, it still remains well above pre-crisis levels.

High levels of child and youth poverty are also a persistent and worsening problem in Ireland. In 2016, 245,000 children lived in households that were living below the poverty line.14 This means that of all children under 17, almost one in five were living in poverty. More worrying still is the fact that this figure

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9 Target 1.2 By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions.
14 Data from Central Statistics Office.
has barely changed in over a decade. The data provided in the same CSO survey showed that 25.2 percent – more than a quarter – of children in Ireland are living in households experiencing deprivation of two or more basic necessities. The figures for children experiencing consistent poverty rose from 107,000 in 2014 to 139,000 in 2016. As such, Ireland is dramatically off course on its target to raise 70,000 children out of consistent poverty by 2020. The consistent poverty rate for young people aged 15-24 years in 2015 was 15.6 percent, which is almost double the overall rate of 8.7 percent and the highest of all age cohorts.

Closely related to Ireland’s high-levels of child poverty are the extremely high rates of poverty experienced by lone-parent households. In 2016, 51 percent of lone parent households with one or more children experienced enforced deprivation. At 50.1 percent, households comprising one adult and one or more children were found to show the highest rates of material deprivation in 2016.

Ireland’s Traveller community suffers multiple forms of discrimination that continue to trap them in situations of poverty and marginalisation. While reliable data on the issue of poverty is not available for this group, a 2017 study by the Economic and Social Research Institute showed that 70 percent of Travellers in Ireland were living in caravans or overcrowded housing while some 82 percent were unemployed.

Asylum seekers in Ireland, who are obliged to live in overcrowded and often unhygienic Direct Provision centres, are forced into poverty by policies directly targeting them. They receive a ‘personal allowance’ welfare payment of €21.60 a week, which places them far below the poverty line (see also SDG 8).

It should also be noted that, although sexual orientation is recognised as a ground of discrimination in Irish law, the government has paid little attention to socioeconomic marginalisation experienced by the LGBTQI+ community. The lack of disaggregated data on LGBTQI+ persons in Ireland precludes effective monitoring of poverty levels experienced by this sector (see also SDG3).

The factors underpinning Ireland’s persistently high poverty levels are manifold, but a number of critical issues should be emphasised. Despite the assertion in the government’s VNR report that Ireland provides comprehensive social protection, social spending in the country is low, standing at 16.1 percent of GDP in 2016 compared to an OECD average of 21 percent. Further, social welfare payments – set at €198 per week in March 2018 – are well below the national poverty line (Target 1.3). A study carried out in 2017 by the Vincentian Partnership for Social Justice found that social welfare did not provide for a minimum essential standard of living in the vast majority of households tested.

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21Target 1.3: Implement nationally appropriate social protection systems and measures for all, including floors, and by 2030 achieve substantial coverage of the poor and the vulnerable.
Young people at the launch of 'Generation for Change: Ireland, young people and the SDGs' report by Ireland’s youth delegates to the UN. Pic: Jason Clarke.
The failure of the economic recovery to deliver quality employment (see also SDG8) has contributed to a persistent trend of low-paid employment and increasing numbers of ‘working poor’. The number of working people experiencing poverty rose from 91,407 in 2009 to 104,011 in 2016. The national minimum wage is set at €9.55 an hour, which falls significantly short of the level needed to provide for a minimum essential standard of living, estimated at €11.70 per hour.

Furthermore, the role of Departmental of Social Inclusion Liaison appointed in a number of government departments, following publication of the National Anti-Poverty Strategy, has become increasingly diluted. Additionally, most departmental business plans or statements of strategies do not include a clear requirement that poverty and social inclusion measures are incorporated into service considerations.

Ireland remains the lowest tax economy in the European Union. While both taxation and social welfare payments play a very significant redistributive role in the country, Ireland’s continued adherence to a low-tax economic model and its relatively low levels of social spending, are key underpinnings of persistent poverty and marginalisation (Target 1A).

In summary, despite a marginal decrease in the overall number of people living below the poverty line between 2014 and 2016, Ireland has fallen far behind its targets for poverty reduction.

**Recommendations**

1. A ‘whole of society’ approach should be taken to eliminating poverty in Ireland. This necessarily requires a ‘whole of government’ approach to the issue, with strong horizontal alignment between different levels of policymaking and implementation, along with continuous monitoring and strong stakeholder participation. This should also include effective poverty impact assessments of all areas of state policy at both the national and local levels.

2. The government should set a new national target to reduce the proportion of the population experiencing consistent poverty to zero by 2025. A comprehensive poverty elimination programme should include specific targets and corresponding policy measures for vulnerable groups including Travellers, migrants, children, young people, lone-parent households, people with disabilities, members of the LGBTQI+ community, and to address urban and rural poverty.

3. The forthcoming 2018-2021 National Action Plan for Social Inclusion should be used as a framework to deliver a robust long-term End Poverty Strategy for the period 2021-2030. This should be led by the office of the Taoiseach.

4. The role of departmental Social Inclusion Liaison officers in all government departments should be enhanced to ensure that anti-poverty measures are embedded in all government policies, mainstreaming of poverty impact assessments is mainstreamed and cross-departmental actions are delivered. Existing supporting mechanisms need to be strengthened and amended, particularly in relation to oversight, implementation and planning, the embedding of social inclusion in departmental operations and strategies, and adequate levels of resourcing to tackle poverty and the disadvantaged at a local level.

\[\begin{align*}
23\text{Data from CSO, calculated by Social Justice Ireland, 2018, Poverty Focus 2018. https://www.socialjustice.ie/sites/default/files/attach/publication/5203/povertyfocus.pdf}\n24\text{Vicentian Partnership, Minimum Essential Standard of Living and the Minimum Wage.}\n25\text{Eurostat, 2017, The tax-to-GDP ratio slightly up in both the EU and the euro area, http://ec.europa.eu/eurostat/documents/2995521/8515992/2-07122017-BP-EN.pdf/0328922-08b-4542-8631-b2a3d78866ab}\n26\text{Target 1.A Ensure significant mobilization of resources from a variety of sources, including through enhanced development cooperation, in order to provide adequate and predictable means for developing countries, in particular least developed countries, to implement programmes and policies to end poverty in all its dimensions.}\n\end{align*}\]
government departments should include measures for addressing poverty and social inclusion.

5. A roadmap towards implementing the living wage should be immediately put in place. The national minimum wage should immediately be increased to €11.70 an hour, so as to ensure it is sufficient to deliver a minimum essential standard of living. This measure should be complemented by the setting of a national target to eliminate poverty among working people.

6. Social welfare payments, including jobseekers allowance, should be benchmarked at a level sufficient to lift people above the poverty line and ensure a minimum essential standard of living. Young people under 26 years in receipt of the lower rate of Jobseekers Allowance should receive the full adult rate.

7. Socioeconomic status should be legally recognised as a ground of discrimination.

8. Poverty and equality impact assessment should be implemented in an effective way across all relevant policy to support delivery on poverty reduction targets.

9. Economic, environmental, social and cultural rights – including the right to an adequate standard of living – should be fully recognised in the Constitution.

10. The 2012 UN Guiding Principles on Extreme Poverty and Human Rights should be fully implemented.

11. The Irish government must set a more ambitious deadline for reaching the target of 0.7 percent GNI allocation to overseas development aid. A comprehensive roadmap and a firm commitment should be delivered to reach 0.7 percent by 2025. Alongside this, Irish Aid should develop a strategy to ensure it is reaching the goal of 'leaving no-one behind' through its programming, including through the redevelopment of the Irish Aid Volunteering Initiative that would take account of trends and developments in good practice in International Volunteering.

12. So as to ensure Ireland's delivery of the promises set out in Agenda 2030, at both the domestic level and internationally, the National Stakeholder Forum on SDG Implementation should have a clear mandate and resource allocations. This should include clear timeframes to ensure its recommendations are properly incorporated into government policy and mainstreamed across all relevant departments. Systems should be put in place requiring the government and/or state bodies to provide justification for non-implementation of NSF recommendations where this occurs. The government should also provide adequate resources and corresponding training and education around the country to facilitate engagement and participation at local level. Particular emphasis should be given to including the voices of people from marginalised sectors in this forum.

13. Ireland should also develop a transparent, well-resourced Policy Coherence for Development mechanism to identify and tackle inconsistencies such as relevant aspects of the country's tax regime and greenhouse gas policies. The government, in close consultation with Irish Aid and civil society organisations, should also ensure policy coherence in its international relations, particularly with regard to fiscal policies, climate change policies, migration/refugees, peace, defence and trade.
The fight against hunger has been core to Ireland’s international development programme for decades, reflecting the country’s famine history and commitment to the very poorest of the world. Ireland has surpassed the commitment to spend 20 percent of ODA on the fight against hunger (Target 2.2).27

The 2010 Hunger Taskforce set out how Ireland could bring added value to the fight against hunger and a series of political, policy and programme investments followed which saw the country become a recognised leader on the issue. This investment, alongside the ‘One World, One Future’ policy has driven a more comprehensive approach to fighting hunger, sustaining investment in critical nutrition specific interventions, prioritising nutrition sensitive approaches across health, education, humanitarian response and resilience building, supporting research in these areas and engaging strategically at EU and UN level, most notably through the ‘Scaling Up Nutrition’ (SUN) movement. Furthermore, Irish Aid has recognised the critical importance of, and prioritised support to, smallholder farmers, drawing on learning from Ireland’s own agricultural development.

At the country programme level, Ireland also supports research to establish ‘what works’ and examine how sustainable agriculture and nutrition can be scaled up in some of the poorest and most vulnerable contexts. Irish Aid provides a level of flexibility that is also commendable (e.g. it is the only donor providing multi-annual funding for Chad) and incentivises innovation (e.g. the RAIN project in Zambia). This is essential to demonstrate solutions to the challenge of hunger which are feasible and scalable.

Ireland’s leadership in international efforts to tackle hunger has waned in recent years, however, and transparency is limited in relation to where Ireland stands on current commitments and how it intends to ensure the considerable investment made will be protected, promoted and acknowledged, with ‘Zero Hunger’ as a priority goal within Ireland’s SDG plans (Target 2.1).28

In light of the new Irish Aid Whitepaper and Ireland’s commitment to growing its global footprint, the country now has a significant opportunity to build on its cumulative credibility and develop a comprehensive Zero Hunger Strategy, supported by renewed political leadership at international level. Such a strategy would confirm a new percentage investment in hunger for the 2020-2030 period, and would build on the Nutrition for Growth commitments (with planned investment in nutrition specific and nutrition sensitive interventions). It would also encompass scaled up efforts in sustainable agriculture and resilience building.

On a final note, it is also expected that Irish Aid will adopt peace and security as one of its strategic foci in the years ahead. Being mindful that 10 of the 13 most severe food crises of recent years have been conflict related,29 this will have important implications for the fight against hunger.
The Healthy Ireland Framework (HIF), launched in 2013, sets out the government's objectives and implementation plans with regard to the country's nutritional wellbeing, along with physical activity and mental health. It is coordinated by the Health and Wellbeing Programme of the Department of Health. The HIF recognises the seriousness of obesity trends in Ireland, and also the extent of health inequalities between different economic deciles and geographic locations. It also affirms the necessity of a 'whole of system' approach in order to address the nutrition crisis. Implementation of the framework has thus far been poor, however; only €5 million was dedicated to the Healthy Ireland Fund in 2017, and implementation of the HIF has been extremely slow.

As a result, Ireland is facing serious challenges with regard to healthy nutrition. The Healthy Ireland Survey reports that less than a third of the population consume the recommended five portions of fruit and vegetables daily. Further, there are pronounced differences in consumption patterns between genders and economic deciles; 33 percent of women consume 'five a day' whereas the figure for men is only 21 percent. Similarly, 30 percent of employed people meet recommended targets, as compared to just 14 percent of those who are unemployed.

In the years ahead, one of the most pressing challenges Ireland is likely to face is an obesity crisis (Indicator 2.2.2). Data from both the World Health Organisation and the Healthy Ireland Survey shows that already 62 percent of those over the age of 20 are overweight, and 25.2 percent are obese.

Irish people are the most overweight in in the WHO's European region, which comprises 53 countries. The WHO forecasting model predicts that, if current trends in Ireland continue, 40 percent of men and 37 percent of women will be obese in 2020, and these figures will rise to 47 percent for both men and women by 2030. These trends indicate that Ireland is on track to become the most obese country in Europe by the SDG deadline in 2030. Further, projections for the proportion of the population being either overweight or obese in 2030 rise to 89 percent for Irish men and 85 percent for Irish women. These facts are notable by their omission from the government's VNR report.

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**Ireland: obesity projections 2008 - 2030**

<table>
<thead>
<tr>
<th>Year</th>
<th>Men</th>
<th>Women</th>
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</thead>
<tbody>
<tr>
<td>2008</td>
<td>25%</td>
<td>35%</td>
</tr>
<tr>
<td>2020</td>
<td>26%</td>
<td>40%</td>
</tr>
<tr>
<td>2030</td>
<td>47%</td>
<td>47%</td>
</tr>
</tbody>
</table>

Source: WHO Europe

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31Ibidem.
32Ibidem.
33Indicator 2.2.2 Prevalence of malnutrition (wasting and overweight).
34Being overweight is defined here as having a Body Mass Index of between 25 and 29.9 percent, while being obese reflects a BMI of 30 or over.
36Ibidem.
37Ibidem.
While current figures for children (0-9 years) and adolescents (10-19 years) are not as alarming, data from the Health Behaviour in School-aged Children Survey shows that among a sample of 11-year-olds, 37 percent of boys and 23 percent of girls were overweight. The WHO European Childhood Obesity Surveillance Unit reports that among seven-year-olds in Ireland, 31.8 percent of boys and 27.3 percent of girls are overweight, while 11.6 percent of boys and 7.7 percent of girls are obese.

An Obesity Policy and Action Plan was launched in 2016. This sets targets to achieve a sustained downward trend (averaging 0.5 percent per annum) in excess weight among both adults and children, and a 10 percent reduction in the gap in obesity levels between the highest and lowest socioeconomic groups within five years. The government has also launched new Nutrition Standards for the state's School Meals Programme, which benefits almost 250,000 children across the country. These standards are not obligatory, however.

It must also be noted that, although Ireland recently overtook the United States as the most food secure nation in the world according to the Economist Intelligence Unit’s Global Food Security Index, hunger too became a significant problem in the wake of the economic crisis, with demand at food banks soaring across the country. It was promised that a “Healthy Ireland Outcomes Framework” would be provided by the end of 2013 and that it would allow for objective assessment of progress.

Five years after the fact, the outcomes framework has not been delivered, and the only criteria for monitoring progress are drawn from other health plans, such as the 2010 National Cardiovascular Health Policy. The latter includes quantitative, time-bound targets, including to “increase by 5 percent the number of adults and by 6 percent the number of children with a healthy weight by 2019” but it is manifestly clear that these targets will not be met.

Also of concern is the fact Ireland has one of the lowest rates of breastfeeding in Europe, especially among rural populations and low-income sectors. Breastmilk is proven to have a positive impact on the health of both mothers and babies, with the World Health Organisation recommending breastfeeding by almost all new mothers. At the international level, meanwhile, Ireland takes a proactive role in the dumping of huge volumes of powdered milk formula and other milk products in Africa.

The most urgent concern with regard to the sustainability of Irish agriculture is undoubtedly the extremely high levels of greenhouse gas emissions (see also SDG 13). Further, there are pronounced problems of overproduction and wasteful practices across the sector (Target 2.4). Agriculture is the largest contributor to water pollution in Ireland. Increased use of pesticides and fertilisers, together with phosphorous losses from agriculture, has been the major driver of a collapse in water quality in the country (see also SDG 6, SDG 14).
Dairy farming accounts for 26 percent of Irish agribusiness, while beef accounts for 14 percent. The sector’s dependence on these two areas – which are inherently wasteful and drive unsustainable levels of GHG emissions – also makes it vulnerable to changes in dietary trends and price volatility. It also requires the production of vast quantities of feed for livestock - with large amounts of nitrates being used to boost grass production - in a highly inefficient approach to land use. Furthermore, European subsidies, known as direct payments, accounted for 65 percent of farm income in 2015. This continued flow of European resources to Irish farmers is particularly marked in dairy farming. In this context, there is an urgent need for a major transformation of the agriculture sector in Ireland, moving away from the dominance of beef and dairy whilst also promoting small-scale agriculture and finding alternatives via the circular and green economies.

In this regard, it is noteworthy that the government’s VNR report, despite acknowledging the environmental harms likely to be caused by plans for agricultural expansion, fails to provide any meaningful detail on how these will be brought into line with environmental objectives.

### Recommendations

1. The Healthy Ireland Framework must be properly resourced and implemented in order to tackle continuing disparities in food poverty, nutritional outcomes, and the impending obesity crisis. The government must also ensure that targets set out in the Obesity Policy and Action Plan are achieved.

2. The government should deliver a wide-ranging national plan to change dietary behaviours, particularly among people in poorer socio-economic circumstances. This should include strong educational supports and sustained public awareness campaigns.

3. Ireland must deliver an ambitious and holistic plan for rapid transformation of the agriculture sector. This must include robust measures to tackle overproduction, and to reduce emissions from the beef and dairy sector. Given that meaningful efficiency gains are not available in this sector, this must necessarily include reducing the size of the ruminant herd, along with incentivizing other forms of agriculture. Plans for the agricultural sector in Ireland should be complemented by robust efforts to tackle climate change at both the national and international levels (see also SDG13). At a minimum, Ireland must ensure EU targets for reduction of GHG emissions are met or exceeded.

4. Ireland’s Health Service Executive (HSE) should implement a dedicated push to improve education and support for breastfeeding across the country.

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International issues

5 Ireland should develop a Zero Hunger Strategy, based on a review of the Hunger Taskforce report and progress since. It should also deliver a clear investment plan extending its EU and ‘Nutrition for Growth’ commitments to 2030 and address the intersectionality of SDGs in its development policy, including the role of indigenous private sector in relation to nutrition. The commitment to allocate 20 percent of ODA to fighting hunger has long since been met and should now be reset at a level which reflects Ireland’s role as a global leader on Zero Hunger.

6 As part of this strategy, Ireland should develop a strategic focus on empowering small-scale farmers in the Global South to become climate resilient. This should include a particular focus on women, who are especially vulnerable to and severely affected by the effects of climate change. Irish Aid should support an enabling policy environment for indigenous smallholders and small agribusinesses to sustainably increase production and achieve greater access to markets.

7 In its international engagements on food, hunger and nutrition, Ireland should look to invest particularly in reducing post-harvest food waste and spoilage. An estimated 25 percent of the world’s food calories and up to 50 percent of total food weight are lost or wasted before people can consume them. Reducing this loss (particularly for small-scale, rain-fed and women farmers) through affordable storage and preservation technologies, but also access to credit and markets, can contribute significantly to supporting Irish Aid’s ambition to tackle hunger and improve nutrition.
Ireland dedicated 7 percent of its ODA budget to Health, HIV and AIDS in 2016. It also provides important supports to health in multi-sector responses along with water, sanitation, nutrition and health interventions in humanitarian emergencies, which are not reflected in its health spending figures.

In 2017, Ireland renewed the partnership between the Health Service Executive (HSE) in Ireland and Irish Aid aimed at enhancing Ireland’s contribution to global health, particularly through partner countries, in the interest of achieving the SDGs. The HSE noted that it shares technical expertise and works to build the capacity of people and institutions in low-income countries, citing efforts to improve the quality of hospital care in Mozambique, support the medical response to the Ebola crisis in West Africa, and provide leadership on human resources for health.

Ireland’s plans for improving health outcomes are set out in the Healthy Ireland Framework 2013 – 2025, which includes goals to reduce health inequalities and to foster a ‘whole of society approach to health. Further, a 2017 Parliamentary Committee on the future of healthcare has set out ambitious proposals for a more integrated approach to health in the country, combining both primary care and social care. Ireland must overcome serious structural challenges if the promise of these plans is to be realised, however, and so far, progress has been limited.

In contrast to most other OECD countries, Ireland does not provide universal primary healthcare (Target 3.8).\(^48\) The country has an atypically complex health system, in which access to basic services is predicated on a variety of factors, including whether individuals have a medical card, a GP visit card, private health insurance and/or personal resources to pay for services. The criteria that must be met to receive a medical card exclude a significant proportion of lower income households, effectively leaving thousands of families without proper health care services because they are not wealthy enough to pay for insurance and not poor enough to be granted a medical card. In 2017, 34.4 percent of the population had a medical card, compared with 30.1 percent in 2008.\(^49\) Co-payments can be prohibitive for some sectors of the community. Visits to accident and emergency carry a €100 charge, while seeing a GP costs, on average, €50 for anyone without a medical card or GP card.\(^50\)

According to OECD data, Ireland has only 2.9 doctors per 1,000 residents, compared to the EU average of 3.6.\(^51\) There is also a stark shortage of hospital beds, the number of which is half the EU average.\(^52\)

\(^{48}\)Target 3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines.
\(^{49}\)Data from Central Statistics Office.
\(^{51}\)Ibidem.
\(^{52}\)Ibidem.
On the issue of accessibility, Ireland ranked last out of 36 countries studied in the 2017 Euro Health Consumer Index. The number of people on waiting lists for outpatient hospital consultations rose from 386,000 in December 2014 to 502,482 in January 2018. Meanwhile, the ambition of targets for reducing waiting lists has been repeatedly reduced since 2001. The current goal of ensuring no-one waits more than 15 months for inpatient or outpatient care is manifestly inadequate.

While expenditure on health rose significantly from 1997 to 2007, bringing the system broadly into line with OECD averages, the country’s health system was subjected to a series of severe spending cuts during the subsequent years of economic crisis. Although Ireland’s expenditure on health has been restored to pre-crisis levels, with some estimates now placing it well above European averages, outcomes remain below EU averages in several key areas.

The government’s VNR report fails to detail worrying trends over time with regard to certain diseases. Incidences of all cancer have been rising since 1994 among both men and women, (Indicator 3.4.1) and it is estimated that by 2020 one in two people will develop cancer during their lifetime. Ireland also has a pronounced and deteriorating problem with respiratory diseases and incidence of all respiratory diseases rose by 15.6 percent between 2006 and 2015, while chronic respiratory disease went up by 24 percent.

In 2014, the overall suicide rate (Indicator 3.4.2) was 11, making it equal to the EU average. However, it should be noted that suicide among teenagers is the fourth highest in the EU/OECD region – a fact that is omitted from the government VNR report. Related to this is the poor state of mental health outcomes among Ireland’s younger people.

Rates of HIV infection – which are also omitted from the government report - have also been rising steadily in recent years, particularly among men who have sex with men (Indicator 3.3.1). The recording of

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54Data from National Treatment Purchase Fund.
57Indicator 3.4.1 Mortality rate attributed to cardiovascular disease, cancer, diabetes or chronic respiratory disease.
58Data from National Cancer Registry Ireland.
59Data from Central Statistics Office, Public Health Information System (PHIS).
60Indicator 3.4.2 Suicide mortality rate.
64Indicator 3.3.1 Number of new HIV infections per 1,000 uninfected population, by sex, age and key populations.
508 new diagnoses in 2016 was the highest since records began. Similarly, rates of Hepatitis B infection, which were decreasing from 2008 to 2011, increased by 24 percent in 2015.

**Diabetes** is also rising in Ireland. The proportion of women with the condition rose from 3.3 percent to 5.1 percent between 1980 and 2016, while the prevalence among men was even more pronounced, increasing from 4.3 percent to 7.3 percent over the same period. Close to 90 percent of this increase is caused by type-2 diabetes (see also SDG 2 on obesity).

Although **alcohol consumption** in Ireland has been decreasing in the recent past, it remains among the highest in Europe and increased in 2016. This fact is overlooked in the government’s VNR report. Per capita alcohol consumption was 11.46 litres in 2016, an increase of 4.8 percent on the previous year. Furthermore, this figure is almost double the global average of 6.13 litres. According to the World Health Organisation, Ireland ranks behind only Austria when it comes to the prevalence of binge drinking.

The most recent All-Ireland Drug Survey shows that **use of illegal drugs** has risen significantly over the past five years (Target 3.5), from 7 percent in 2010/2011 to 8.9 percent in 2014/2015. In July 2017, the government launched a new health-centred drugs strategy entitled ‘Reducing Harm, Supporting Recovery’, though its impact cannot yet be determined.

Marked **inequalities** are manifest in health outcomes among marginalised sectors of Irish society. Members of the Traveller community – who are ignored under SDG3 in the government VNR report - live on average 15 years less than their counterparts in the wider population. The proportion of people experiencing poor health increases among lower social strata, with 2.6 percent of unskilled workers reporting bad or very bad health, as compared to 0.5 percent of professionals. People in disadvantaged areas are three times more likely to experience depression compared to those in affluent areas.

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71 Target 3.5 Prevention and treatment of substance abuse, including narcotic drug abuse and harmful use of alcohol.
75 Data from Central Statistics Office.
Research carried out in the development of Ireland’s LGBTQI+ National Youth Strategy meanwhile identified serious shortfalls in health services for this community, particularly among those who identify as transgender.\(^76\) The LGBTQI+ community also experiences significantly poorer mental health outcomes, with twice the level of self-harm and three times the level of suicide as the general population.\(^77\)

While overall life expectancy is marginally above EU averages, there are marked differentials between different socio-economic deciles, with men from deprived areas living to 73.6 years on average, as compared to 78 years among the more affluent.\(^78\) Women from poorer communities live to 80 years on average, with women in better-off areas living 2.7 years longer.\(^79\)

It must also be noted that demographic trends, most notably Ireland’s ageing population, will further fuel pressures on the country’s health system in the years ahead.

**Recommendations**

1. Ireland should transition to universal free primary healthcare, in line with the recommendations of the Joint Parliamentary Committee on the Future of Healthcare. It should commit to promotion of, and investment in, the Right to Health for all. This will require a long-term planning and investment in the sector.

2. A ‘whole of government’ approach should be taken to health care. This will require strong horizontal alignment between different levels of policymaking and implementation, along with continuous monitoring and strong stakeholder participation. Education on SDG indicators and timelines concerning healthcare provision should be delivered across all relevant government departments. Medical Card coverage should be guaranteed to all persons in situations of vulnerability. The government’s healthcare plans should also include ‘whole of society’ health policies, including appropriate resources and support to community health schemes and local authority health initiatives across the country.

3. The government should set clear targets for reducing health inequalities in accordance with the Healthy Ireland Strategy, including health and equality proofing of policies. This should include targeted measures to tackle the severe health inequalities experienced by members of the Traveller community and the LGBTQI+ community in particular. Policies and programs must also explicitly recognise the social determinants of health outcomes in order to foster connection across all areas of policy.

\(^78\)Data from Central Statistics Office.
\(^79\)Ibidem.
4 Sufficient resources should be allocated to the health service to bring the number of hospital beds into line with standards set by the Health Information and Quality Authority (HIQA).

5 The government should enact the Public Health (Alcohol) Bill 2015 without further delay and ensure the swift implementation of the measures in the legislation to address the price, availability and advertising and marketing of alcohol, in particular as it impacts on vulnerable people such as children and young people.

6 Sustained public awareness campaigns should be delivered to incentivise behavioural changes reducing incidence of cancer, heart disease and respiratory conditions, and all preventable illnesses and infections.

7 The government should recognise that individual health is largely influenced by both individual and community social, environmental and economic wellbeing, and in this context should provide the resources that are required to enable communities to develop a vision for the wellbeing of their communities for this and future generations.

8 Being mindful of demographic trends in Ireland, most notably the country's ageing population, a statutory entitlement to home care should be created, along with corresponding policies and resources to ensure home care services around the country. Additional respite care and long-stay care facilities for older people and people with disabilities must be delivered. This will require significant capital investment to build additional community nursing facilities.

9 Sexual and reproductive health education should become an obligatory part of Ireland's education curriculum. This should be part of a comprehensive sexual and reproductive health policy for adolescents and LGBTQI+ awareness and understanding programmes. Child and Adolescent Mental Health Services must be fully resourced and provided nationwide in accordance with AAAQ criteria (Availability, Accessibility, Acceptability and Quality).

10 The Department of Health should ensure 10 percent of the national health budget is allocated to mental health by 2025.

11 Irish Aid should maintain its commitment to strategic prioritisation of HIV/Aids, tuberculosis and malaria targets within Agenda 2030, including through transparent, accountable funding support to the WHO, UNAIDS and the Global Fund to Fights AIDS, TB and Malaria.

12 Ireland should promote increased resources, along with enhanced policies, institutions and processes, for health care staff, systems and infrastructure, as well as for related systems (water, sanitation, hygiene, nutrition, social protection), to improve the availability, accessibility, affordability and acceptability of services especially for poor, marginalised and vulnerable groups, and countries ranked as having Low Human Development. Complementing this, it should support and invest in international health surveillance to help prevent epidemics, pandemics and application of WHO International Health Regulations.
ENSURE HEALTHY LIVES AND PROMOTE WELL-BEING FOR ALL AT ALL AGES

The SDGs will not be achieved without support for Development Education and Global Citizenship Education. Target 4.7 calls on countries to ensure that all learners acquire the 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 nonviolence, global citizenship and appreciation of cultural diversity and of culture’s contribution to sustainable development.

Despite the assertion of “significant” investment in the government’s VNR report, the level of financial investment by Irish Aid – 0.57 percent of ODA – is manifestly insufficient to support the full and successful implementation of its new Development Education Strategy – particularly with regard to the creation of new strategic partnerships in the non-formal sector and the move towards multi-annual funding.

On a more positive note, Irish Aid must be commended for the sustained nature of its engagement with the Global Partnership for Education and the increase in funding it has pledged to support the work of the Partnership. Being mindful of the GPE’s focus on girls’ education - which is widely recognised to have important and transformative impacts in the short and long terms - this is very welcome. In this area, Ireland should redouble its commitment to ending gender-based violence in education, which remains a major barrier to girls’ education in many countries. The support of the Irish Government for the Safe Schools Initiative is also welcome.

Ireland prides itself on being one of the best-educated countries in the world. Its plans for improvement of the education system are set out in the Action Plan for Education 2016-2019, while commitments regarding education for sustainable development are detailed in the National Strategy on Education for Sustainable Development 2014 – 2020.

Serious problems of discrimination exist in the education system, however, and it has not recovered from eight successive austerity budgets that caused a huge increase in child poverty and exacerbated inequalities in education. Furthermore, there are concerns as to whether current commitments to mainstreaming sustainable development education are sufficient to deliver meaningful awareness and ownership of Agenda 2030.

Ireland’s spending on education - at 4.8 percent of GDP - remains lower than the OECD average of 5.2 percent.83

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81http://www.protectingeducation.org
The country’s scant investment in early childhood education (Target 4.2)\(^8^4\) is particularly concerning. It devotes just 0.5 percent to early childhood education and care compared to an OECD average of 0.7 percent.\(^8^5\) This is half the UNICEF target of 1 percent. In this area and Ireland ranks last in the EU.\(^8^6\)

Given that this has been a key concern of civil society in Ireland for some years, it is disappointing that it is not examined in more detail in the government’s VNR report. Spending per student from primary to third level has decreased by 15 percent since 2010.\(^8^7\)

This pattern feeds into the stark socioeconomic inequalities at work in the Irish education system (Target 4.1).\(^8^8\) Children from affluent areas are twice as likely to attend university as those from poorer areas.\(^8^9\) The Delivering Equality of Opportunity In Schools (DEIS) programme - the government’s principal mechanism for addressing educational disadvantage in the school system - provides targeted support to schools attended by significant numbers of children from poorer households. While retention rates in schools covered by the DEIS programme have improved, and the gap between these and non-DEIS schools has narrowed significantly, completion rates in DEIS schools remain far behind the average. In 2017, retention in DEIS schools stood at 82.7 percent, compared to a national average of 90.2 percent.\(^9^0\) Focusing on DEIS schools only is problematic as it misses out on pockets of deprivation and need in what might be seen as more affluent areas.

The results of Census 2016 confirmed that Ireland has one of the youngest populations in Europe with one-third aged under 25 years.\(^9^1\) The latest census results also show that the number of young people aged 10-24 will increase by 11.6 percent between 2015 and 2025 and will be just over one million by 2025. While it is true that Ireland, in line with most countries in the Western World, has a growing older population, these figures confirm that Ireland is also unusual in that it has a large and growing youth population.

With adequate resources the youth work sector is well placed to support young people to reach their potential and make Ireland the best country in the world in which to be a young person. In 2008, the investment in youth work services was €76 per young person. By 2014, this had fallen to €58 per young person. While there has been some increase in funding more recently, the youth population is also growing significantly, and, as a result, the actual investment in 2017 amounted to €59.50 per young person. As such, it is urgent that investment in young people and youth work be increased significantly.

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\(^{84}\) Target 4.2 By 2030, ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education.


\(^{87}\) Data from Department of Education and Skills.

\(^{88}\) Target 4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes.

\(^{89}\) Op cit, 81.

The government’s VNR report fails to address continuing problems in overall **adult literacy** in Ireland. In 2012, the OECD\(^92\) found that 18 percent of Irish adults were at or below level 1 on a five-level literacy scale, meaning that they have difficulty with basic reading **(Target 4.6).**\(^93\) This means that 521,550 Irish adults (aged 16–64) find reading and understanding everyday texts, such as reading a leaflet, bus timetable or medicine instructions difficult. Ireland also has a serious adult numeracy and digital skills issue. One in four - 754,000 people - has difficulties in real world maths, including basic addition and subtraction to calculating averages.\(^94\)

The adult literacy budget is approximately €30 million and has been static for the last number of years – this is 0.03 percent of the total education budget.\(^95\) In 2006 the Joint Oireachtas Committee on Education and Science produced an Adult Literacy report advising a quadrupling of the adult literacy tuition budget from €25 million to about €100 million by 2013 with an additional €25 million for improving ancillary and support services. This recommendation was never implemented. Ireland’s **National Skills Strategy 2025** has a target of upskilling 165,000 people from PIAAC Level 1 in literacy and 256,000 people from PIAAC Level 1 in numeracy by 2025. However, previous targets relating to the low-skilled have not been met.

Of particular concern in the Irish context is the severe and continuing marginalisation experienced by the **Traveller community**, which was formally recognised as an ethnic minority in 2017. The declaration in the government VNR report that Traveller education provisions have been “mainstreamed” belies the fact that some 91 percent of Travellers leave school by the age of 16, with 28 percent leaving by 13.\(^96\) Only 1 percent of Travellers hold a university degree.
while 25 percent receive no formal education whatsoever.\textsuperscript{97} The National Traveller and Roma Inclusion Strategy 2017 -2021 sets out plans to improve educational outcomes among this community, including through early intervention welfare supports and programs to celebrate Traveller culture and identity in primary and secondary schools. Importantly, provisions for specialised resource teachers for Traveller children, which were discontinued in 2011, have not been restored. There is a pressing need for an ethnic identifier to be included in educational data gathering systems.

Lone parent participation in education in Ireland has decreased by approximately 20 percent between 2011 and 2016.\textsuperscript{98} The lack of accessible, affordable childcare, secure housing tenure and supported pathways presents significant barriers to all levels of education for lone parents.

Asylum seekers and undocumented young people – who are ignored under SDG4 in the government VNR report - also face tremendous barriers, including prohibitive fees, in accessing third-level education in Ireland (Target 4.3).\textsuperscript{100} Last year, only two asylum seekers were granted third-level grant support under a government scheme for young people in the protection system. There is also a pronounced lack of English language support for refugees and those in Ireland’s Direct Provision system (see also SDG1), many of whom have already missed multiple years of education.

In Ireland, children with \textbf{special educational needs} attend mainstream schools and are provided with additional supports. Though funding allocations for special needs educational supports and training has been increased in recent years, the country has still not enacted the 2004 Education for Persons with Special Educational Needs Act, and, as such, new resource flows are subject to policy change.

Another critically important issue not addressed in the government VNR report is the fact that, although all children are legally entitled to free primary and secondary education, Ireland’s school system is almost entirely run by religious institutions, with 96 percent of schools being denominational. Given that many schools are legally entitled to give preference to students from certain religious backgrounds in their admissions practices, this leads to ‘baptism barrier’ whereby children from other religions are at risk of being denied entry to certain schools (Target 4.1).\textsuperscript{101} The government is close to enacting legislation - The Education (Admissions to Schools) Bill – which will prohibit schools from denying admission to children on religious grounds, but there are continuing concerns that the legislation allows exceptions for minority religion schools in order to allow them to ‘protect their ethos’.

\begin{itemize}
\item \textsuperscript{97}Ibidem.
\item \textsuperscript{98}Census 2016. http://www.cso.ie/en/census/
\item \textsuperscript{100}Target 4.3 By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university.
\item \textsuperscript{101}Target 4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes.
\end{itemize}
Provisions for sex education in Ireland’s school system remain extremely limited and subject to compliance with the school’s religious ethos. (see also SDG5). There is an urgent need for better provisions to support the LGBTQI+ community in Irish schools. Research carried out in the development of Ireland’s forthcoming LGBTQI+ National Youth Strategy found that one in five members of this community experience bullying. The same research showed that provisions in the education system to promote understanding and awareness of LGBTQI+ issues were largely absent and, in some cases, actively regressive. The decision by the Minister for Education and Skills to review the Relationships and Sexuality Education programme with a view to including issues such as consent, LBGTQI+ issues, contraception, social media usage, is a positive development.

Progress in mainstreaming sustainable development education (Target 4.7) into school curricula has been limited. This is particularly concerning in light of the extremely low levels of awareness of the SDGs in Ireland. Given the importance of a ‘whole of society’ approach to delivering Agenda 2030, it is crucial that the Department of Education and Skills fully resources the aforementioned Strategy on Educational for Sustainable Development.

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105 Target 4.7 By 2030, ensure that all learners acquire the 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 Teaching Council, as the professional regulatory body, has a particular role to play in ensuring that the teachers’ professional learning, from initial teacher education to continuing professional development, includes education for sustainability, as is the case in Scotland. Current plans make only passing references to the role of non-formal and informal education initiatives – crucial to ensuring broad ownership of the SDGs – in promoting broad societal uptake of sustainable development issues. There are no strategic partnerships between Irish Aid and non-formal sectors as promised in Irish Aid’s Development Education Strategy. This is holding back progress of organisations supporting the achievement of the SDGs. There must be greater efforts to document development education work to highlight just how civil society and government in Ireland are achieving the SDGs at personal, local, national, and global levels.

**Recommendations**

1. Ireland must significantly increase its investment in education, bringing it into line with the OECD average of 5.2 percent. This should include an allocation of at least €50 million to early childhood education and care, and after school care. Free third level education should be guaranteed for all people living in Ireland. A human rights-based approach to education provision in Ireland should be adopted, placing children’s rights at the centre of policy development.

2. The government should carry out a participative national review of Irish curriculums and standardised educational evaluations systems in order to provide greater emphasis on civic engagement and the attainment of equality, inclusion and environmental and planetary stewardship.

3. Resource allocation to the Delivering Equality of Opportunity In Schools (DEIS) programme should be significantly increased to guarantee rapid progress towards substantive equality of outcomes across education provision in Ireland. This should be complemented by targeted measures and supports for members of marginalised groups, such as the Traveller community, lone-parent families, persons with disabilities, and programs to celebrate diversity and eliminate prejudice in the school system.

4. Religious discrimination in all forms should be eliminated from admissions policies in all Irish schools. The government must ensure that no child is turned away from state-funded schools on grounds of their religious background, irrespective of whether schools are oversubscribed. If necessary, the Education (Admissions to Schools) Bill should be amended or replaced, and additional resources provided to oversubscribed schools.

5. Investment in youth work services should be increased to €81 per young person by 2020, which represents €76.5 million in total. In order to achieve this, the government must allocate an additional €22.5 million in the next budgets to 2020.

6. The Irish government should ensure that young people in Ireland have access to comprehensive, rights-based age-appropriate sexuality education consistently throughout their schooling. This should be built upon the solid foundation of the current review of sexual health education at both primary and post-primary level.

7. Curriculums in Irish schools should be reviewed to ensure consistent delivery of LGBTQI+ awareness and understanding, along with targeted psychoemotional and learning supports for members of this community. The recently published LGBTQI+ National Youth Strategy must be fully resourced and implemented.
The Education for Persons with Special Educational Needs Act should be immediately implemented and fully resourced.

Specific supports must be provided to ensure that children living in direct provision, asylum seekers and undocumented children are not at risk of educational disadvantage, including a guarantee of free primary, secondary and third-level education for all asylum-seekers and undocumented young people living in Ireland. Barriers to access to financial support for further and higher education must be removed.

Greatly increased investment should be provided for adults with low skills and in particular with low literacy and numeracy and digital skills. All adults with literacy, numeracy and digital needs and less than a QQI Level 4 qualification should be offered a high quality and relevant learning programme with a local education and training provider. An increased investment in the Skills for Work programme could specifically target employees with literacy and numeracy needs in particular sectors and could be funded through the National Training Fund (NTF). The government should introduce a targeted paid learning leave programme for employees in work with less than a level 4 qualification to develop their basic literacy and numeracy skills. This intervention would be for a maximum time period and funded through the social insurance (PRSI) system.

The government should appoint a Junior Minister for lifelong learning and literacy and set up a cross departmental co-ordination group to develop, implement and evaluate a national plan for improving adult, young people and children’s literacy, numeracy and digital skills. This should include community, cultural, digital, family, financial, health, media, sport and workplace literacies.

The Irish government should ensure that the Central Statistics Office delivers fully disaggregated data, including on ethnicity, at all levels and stages of Ireland’s education system.

In order to engender a ‘whole of government’ approach to the SDGs, Ireland should ensure all relevant government departments and agencies – especially the Department of Education and Skills, the Department of Children and Youth Affairs, the Department of Communications, Climate Action and Environment, the Department of Foreign Affairs and Trade, and Irish Aid – mainstream development education and education for sustainable development. Investment in SDG 4.7 should be significantly increased, and strategic multi-annual funding modalities put in place. At least three percent of ODA should be allocated to the Development Education. In addition, the DES must fund the implementation of the Education for Sustainable Development Strategy. Irish Aid, the DES and the Irish Government, through the National SDG Implementation Plan should develop an indicator on SDG Target 4.7 specifically for the non-formal sector. Currently work undertaken in the non-formal sector is not being documented as per global indicators. In order to deliver a ‘whole of society’ approach to the SDGs, sufficient institutional support should be provided to integrate development education across life-long learning.
International issues

14 Ireland should increase its investment in education in the developing world from 4 percent of ODA to 15 percent as recommended by UNESCO. It should ensure it meets commitments made to the Global Partnership for Education to provide €4 million per annum up to 2020; support the Education Cannot Wait Fund and International Financing Facility for Education; and also deploy other modalities to invest in education including CSOs, who frequently work in hard to reach locations and particularly target marginalised populations.

15 In order to operationalise the commitment to ‘Leave No-One Behind’, Irish Aid should prioritise the ‘hard to reach’ particularly promoting girls’ education, education for children with disabilities.

16 Education for people, especially children, affected and displaced by emergencies and protracted crises must continue to be supported by the Irish government. Specifically, Irish Aid must continue to provide financial and other assistance to current projects involving UNICEF’s No Lost Generation, the UN OCHA and UNWRR programmes.

17 Ireland should promote education as a human right and a common good. It must push for international embrace of the core responsibility to provide universal and publicly funded education together with proper regulation of other providers.

18 Alongside access and equity, Ireland should promote a redoubled international focus on educational quality, through modalities including pre-deployment and in-service teacher training, coherent curriculum and teaching/learning outcomes, school leadership development, a supportive culture for teaching and learning, and ensuring that schools are child-friendly and rights-respecting environments.

19 Also in keeping with the ‘Leave No-One Behind’ principle, Ireland must dynamically balance its focus on value for money with recognition of the additional difficulty, energy, costs and time involved in reaching particularly poor, marginalised and vulnerable population cohorts in developing countries, such as girls, refugees, migrants, internally displaced people, people with disabilities, and women.
ACHIEVE GENDER EQUALITY AND EMPOWER ALL WOMEN AND GIRLS

Over 46 per cent of Ireland’s bilateral ODA is focused on addressing gender equality and women’s empowerment. Ireland supports the participation of women in peace processes and security decisions, in line with UN Security Council Resolution 1325, and has also shown leadership in chairing the 62nd Commission on the Status of Women, supporting the Gender Action Plan of the UN Framework Convention on Climate Change and pushing for a commitment to increase gender capacity in the Secretariat of the UNFCCC.

Irish Aid’s spend on gender equality and women and girl’s empowerment needs to be better disaggregated, however. This should have been provided for in accordance with the recommendations of a 2010 internal review which called for a new action plan and results framework on Irish Aid’s gender equality work.

One area of particular concern is funding to sexual and reproductive health (SRH), which is not disaggregated or reported on separately from general health and HIV related funding. Core funding to the UN Population Fund has been reduced in recent years, and there is little consistency or predictability in funding to UNFPA thematic funds. Moreover, the 2004 Irish Aid gender equality policy has not been reviewed to reflect the stronger focus on sexual and reproductive health. There is no sexual and reproductive health policy that might form the basis of an accountability framework to ensure that funding is aligned to policy commitments.

Also, the government’s VNR report omits the fact that Ireland is among a group of countries upholding reservations to the Convention on the Elimination of Discrimination Against Women, notably with respect to reproductive rights. These issues should be addressed as a matter of priority in order for Ireland to legitimately champion the rights of women and girls globally.

Article 41.2.1 of the Irish Constitution declares “the State recognises that by her life within the home, woman gives to the State a support without which the common good cannot be achieved. The State shall, therefore, endeavour to ensure that mothers shall not be obliged by economic necessity to engage in labour to the neglect of their duties in the home.” Despite both a constitutional convention and the UN Committee on the Elimination of Discrimination Against Women calling for this article to be removed or altered to gender-neutral language, no change has taken place as yet (Indicator 5.1.1).108 The government has set an indicative timetable to hold a referendum on the matter in October of this year.

The Employment Equality Act 1998 outlaws discrimination on grounds of gender, family status, marital status, age, disability status, sexual orientation, religion, race or membership of the Traveller community. This is complemented by the 2000 Equal Status Act, which prohibits discrimination in the provision of services, education and accommodation, whilst also banning sexual and other forms of harassment.

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108Indicator 5.1.1 Whether or not legal frameworks are in place to promote, enforce and monitor equality and non-discrimination on the basis of sex.
government’s plans for tackling gender inequality in the country are set out in the National Strategy for Women and Girls, which was launched in May 2017. Women’s groups have welcomed the signing of the Council of Europe Convention on preventing and combating violence against women and domestic violence, along with the drafting of a new Domestic Violence Bill. However, Ireland has yet to ratify the Istanbul Convention on preventing and combating violence against women and domestic violence.

A lack of quality data on gender-based violence in Ireland – in itself a significant barrier to tackling the issue – makes it difficult to assess trends over time (Indicator 5.2.2). However, a Europe-wide survey carried out by the European Fundamental Rights Agency showed that 26 percent of Irish women had experienced physical and/or sexual violence by a partner, while 31 percent had been subjected to psychological violence.

Irish women are pronouncedly underrepresented in the upper echelons of both political and economic life (Target 5.4), accounting, for example, for just 17 percent of Chief Executive Officers in Irish companies. While their presence in both senior and middle management positions has been increasing incrementally in recent years, progress remains slow. In politics, women account for 22 percent of members of Dáil Eireann, Ireland’s lower house and principal chamber of parliament (Indicator 5.5.1).

Women continue to face a disproportionate burden of responsibility for unpaid care work, which in turn limits their ability to participate in all areas of life on an equal footing with men. In 2016, 84 percent of lone-parents were female. The most recent data from the Central Statistics Office shows that women provide two thirds of all unpaid care work. More strikingly, in the 2016 census, 98 percent of those who identified as being responsible for looking after the home and family were women, while just 9,200 of the country’s 2.3 million men made the same statement. Data from the OECD indicates that women in Ireland spend almost 5 hours a day on unpaid work, compared to 2 hours and 9 minutes for men. It is surprising that the government VNR report fails to address this issue beyond acknowledging that many women are unable to work due to caring responsibilities and recognising the “important and valuable contribution that carers make to society”.

Ireland is also slipping down global rankings with regard to the gender pay gap. Last year, the World Economic Forum’s global gender gap index showed that Ireland has fallen from fifth place in 2015 to eighth in 2017. According to Price Waterhouse Coopers’ Women in Work Index, Ireland now ranks 25 out of 33 OECD countries.

In a country with one of the highest rates of low pay in the world, women are also starkly overrepresented in low-paid employment (see also SDG 8). Research by the Low Pay

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110Indicator 5.2.2 Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation.
112Target 5.4 Recognize and value unpaid care and domestic work through the provision of public services, infrastructure and social protection policies and the promotion of shared responsibility within the household and the family as nationally appropriate.
114Indicator 5.5.1 Proportion of seats held by women in national parliaments and local governments.
117PwC Women In Work Index: Closing the gender pay gap, February 2017.
Commission shows that while 2.7 percent of men were earning minimum wage, the corresponding figure for women was more than double, at 7.1 percent. Occupational segregation is also a significant problem, with women making up the majority of workers in those sectors — such as hospitality and retail — that were hardest hit by the economic crisis. In the public sector, where they make up the majority of workers, women are crowded into the middle and lower pay grades and are severely underrepresented in more senior levels. The gender pay gap is further exacerbated by women’s disproportionate reliance on part-time work. Almost 35 percent of Irish women work on a part-time basis compared to 13.3 percent of men. These factors, combined with the increasing casualisation of Ireland’s labour market, conspire to create a gendered economic stratification of work in Ireland.

In the 2017 Budget the government introduced an Affordable Childcare Scheme (see also SDG 1) in an effort to tackle one of the longest-standing and most pernicious impediments to women’s equality in both the workplace and in economic standing. It is disappointing that the government’s VNR report fails to make this link under SDG5. The 2016 introduction of paid paternity leave – albeit at only two weeks – was also a welcome step in creating an enabling environment for more meaningful gender equality.

These recent measures notwithstanding, the challenges that lie ahead are huge. For example, single-parent families – over 90 percent of which are headed by women – face a consistent poverty rate of 24.6 percent - the highest rates of any cohort in the EUSILC (see also SDG1).

An historic referendum on 25 May 2018 has paved the way for Ireland’s provision of reproductive healthcare, which remains among the most restrictive in the world, to be changed. The Eighth Amendment to the Irish Constitution that makes the ‘right to life of the unborn’ of equal value to the right to life of the pregnant woman, (Target 5.6) will now be repealed in accordance with the democratic mandate and the repeated calls of international and regional human rights oversight bodies. Under the Amendment, women were forced to travel abroad to access abortion services or to import abortion pills illegally. It is estimated that close to 4,000 women each year – a total of 177,000 since 1971 - were forced to travel abroad to access healthcare due to Ireland’s regressive laws in this area. Ireland’s Parliament will now debate new legislation to regulate the provision of abortion care in Ireland.

Young women and girls face a number of pressing obstacles to meaningful equality in Ireland. Among these are the poor provision of sexual and reproductive health education and prevention services (see SDG4) and legal barriers to accessing modern forms of contraception. Neither of these issues is addressed in the government’s assessment of SDG5. It must also be noted that there is growing concern over female genital mutilation in Ireland (Indicator 5.3.2). It is estimated that since 2011, 3,780 women and girls in Ireland have suffered FGM and the figures continue to rise. The Taoiseach has called on the Minister for Health to produce a report on the matter.
Average hours dedicated to unpaid care work each day

Women: 5 hours

Men: 2.9 hours

Recommendations

1. The recommendation of the Constitutional Convention and various international human rights oversight bodies that Article 41.2.1 of the Constitution be either removed or altered to make it gender neutral should be implemented.

2. Following repeal of the Eight Amendment to the Irish Constitution, legislation to provide for abortion care in Ireland should be enacted in full compliance with the recommendations and guidelines of international human rights bodies. Corresponding services must be rolled out promptly across the country in accordance with AAAQ criteria.

3. The Istanbul Convention on preventing and combating violence against women and domestic violence must be ratified promptly.

4. An updated national survey on sexual and domestic violence must be carried out immediately.

5. The Irish government should implement policies to tackle the pervasiveness of low-pay in the Irish economy. The national minimum wage should immediately be increased to €11.70 an hour, so as to ensure it is sufficient to deliver a minimum essential standard of living. Furthermore, labour and minimum wage policies should seek to address the disproportionate representation of women in low-paid sectors. The government should enact legislation to ensure better availability of flexible work organisation and statutory protections for leave entitlements.

6. The government should provide legal recognition to the fundamental economic role of unpaid care work. It should further design and implement robust legal protections and social protection measures to ensure women involved in such work do not suffer economic or other penalties as a result. Sustained awareness and promotional campaigns should be undertaken to ensure men take responsibility for at least 50 percent of unpaid care work.
7 The Gender Equality Unit of the Department of Justice should be fully resourced and supported to effectively address all forms of violence and discrimination against women in Ireland, and to address all aspects of gender equality in a robust and comprehensive manner.

8 Plans to deliver affordable childcare services across Ireland should be implemented rapidly and in a fully transparent manner in close consultation with women’s groups.

9 Clear, time-bound targets should be established for women’s (and women’s groups’) participation in political structures at all levels. Employer organisations and trade unions should be required to develop sectoral collective agreements and develop regulations customised to their sectors to confront gender inequality and discrimination in the workplace. The UN Guiding Principles on Business and Human Rights should be fully implemented, with a strong gender focus, and mechanisms put in place for consistent national monitoring.

10 A comprehensive sexual and reproductive health policy for adolescents should be developed and implemented. The provision of sexual and reproductive health education should be guaranteed in all Irish schools as part of an obligatory national curriculum. Economic and legal barriers to accessing modern forms of contraception should be eliminated promptly.

11 A National Action Plan for eliminating female genital mutilation in Ireland should be developed and implemented.

International issues

12 Ireland should continue to pursue an active international agenda on gender equality, in close association with UN Women and civil society organisations, especially with regard to equitable access to quality education and essential healthcare, decent work, safety from violence (including sexual and gender-based violence), social participation and public representation, peace and security. Irish Aid should maintain its priority focus on women and girls’ empowerment and political participation, along with the prevention of sexual and gender-based violence, as set out in the White Paper on Irish Aid. Irish Aid’s Gender Policy should be reviewed and updated, with a strong focus on sexual and reproductive health and rights, in consultation with civil society.

13 Ireland should support women’s empowerment and leadership while also paying special attention to gendered dimensions of poverty, exclusion and vulnerability within its international affairs, including but not limited to development cooperation, humanitarian response, human rights, climate change policies, migration/refugees, peace, security, defence, and trade.
The global implications of Ireland's achievement of SDG6 are, apart from the elimination of threats to human health such as cryptosporidium, largely tied up with biodiversity issues, as hitherto Ireland's historic high water quality enabled the sustainability of significant and globally important (many of which are transboundary-migratory) species including Atlantic salmon, which are now facing substantial problems in both freshwater and marine environments, and other migratory fish including European Eel and Lamprey.

Ireland is the last significant Western European habitat for populations of Freshwater Pearl Mussel and is also home to numerous species designated under the EU Habitats Directive such as the European Otter. As such, Ireland has an international responsibility to ensure the maintenance and improvement of water quality on and around the island.

Ireland possesses some of the most pristine waters and related biodiversity remaining in Western Europe, but these are disappearing at a fast rate. An expanding economy and population presents an increasingly urgent threat of widespread further deterioration of water quality in the country. In addition, the persistent release of raw untreated sewage into rivers lakes and the sea from 45 locations including several large towns is a cause for concern.

The key legal instrument for the protection of the aquatic environment in Ireland is the EU Water Framework Directive which requires the achievement of the minimum ‘good status’ for all waterbodies by 2021. Steps to be taken to ensure Irish waterbodies meet related targets on water quality as well as the physical state of water bodies are set out in the River Basin Management Plan (RBMP) 2018–2021.

The government’s VNR report provides an overview of various plans and policies to improve water quality in Ireland but fails to give any meaningful detail on just how serious the current situation is. It also avoids discussion of the principle causes driving the decline in water quality in the country. Furthermore, the report states that water quality in Ireland has “stood still” for the past 10 years, whereas in reality it has deteriorated significantly (Indicator 6.3.2.).

Principle issues affecting the status of Ireland's waters, as set out in the RBMP, are in order of impact:

- pollution from agriculture - 53 percent;
- hydromorphological (physical) alterations - 24 percent;
- urban wastewater discharges - 20 percent;
- forestry impacts - 16 percent;
- pollution from unsewered domestic wastewater - 11 percent; and
- peat extraction - 8 percent.

Environmental groups are extremely concerned by the RBMP's failure to address issues affecting the status of coastal waters (see also SDG14), despite only 37 percent of estuaries and 76 percent of wider coastal waters achieving quality benchmarks.
According to the data provided in the RBMP, the percentage of water bodies at good or high status are as follows: 57 percent of rivers, 46 percent of lakes, 31 percent of estuaries, 76 percent of coastal waters, and 91 percent of groundwater. There is a worrying trend in the decrease in the number of vulnerable ‘high status’ sites. In 2015, only 21 sites (0.7 percent of the total) met these criteria, as compared to 575 in 1990 and 82 in 2003. The greatest threats to these come from forestry, hydromorphological (physical) changes, and agriculture. Widespread eutrophication (nutrient enrichment leading to oxygen loss), which leads to excessive growth of algae and plants, is caused by discharges of phosphorous and nitrogen into the water system.

Another key pressure on Ireland’s water quality is the discharge of untreated sewage (Target 6.3). This urgent issue is ignored in the government’s VNR report. The EPA has highlighted that raw sewage was discharged from 45 urban areas in 2014. The same year, 12 large urban areas were found to be in violation of the EU Urban Waste Water Directive. The proportion of wastewater discharged into sensitive areas that violates EU nutrient quality standards rose from 17.5 percent in 2013 to 24 percent the following year. The EU average for compliance on this indicator is 88 percent.

The most recent Water Services Strategic Plan only proposes to bring 90 percent of wastewater discharges into compliance with the most basic requirements of the 1991 Urban Waste Water Treatment Directive by 2021. This translates to only 40 percent compliance with the more stringent Water Framework Directive specification by the same date.

Meanwhile, Ireland’s peatlands, which are home to unique ecosystems, are being rapidly impacted by intensive industrial and artisanal peat extraction (Target 6.6). There is a pressing need to provide stronger protections for these important wetland habitats.

The government’s plans for imminent expansion in agriculture, marine and forestry development (see also SDG13, SDG 15) pose a significant further risk of deterioration to the water environment due to the increased inputs of fertiliser, slurry, pesticides, and suspended solids. Although the government’s VNR report highlights a new Agricultural Sustainability Support and Advisory Programme that will “encourage behavioral change” in the sector, environmental groups warn that expansion plans are manifestly incompatible with environmental goals and targets.

It must also be noted that policies concerning water bodies and water management have important social and economic implications. The proposal to privatise Ireland’s water system and policies to impose household water charges during the country’s economic crisis led to mass public protests in 2013 and 2014, eventually leading to the government abandoning the plans. As data from the Central Statistics Office reveals high rates of water waste in domestic usage, there is a growing need for more effective public awareness campaigns regarding water conservation as well as the need to propagate knowledge of ‘best-practices’ to

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128Target 6.3 By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.
130Ibidem.
133Target 6.6 By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes.
achieve water quality objectives. In this context, broad public participation in both the provision of water services and in the conservation of Ireland’s water bodies are necessary to the sustainable management and conservation of Ireland’s water resources (Target 6b).

**Recommendations**

1. The government should make a clear commitment to achieve good status for all water bodies by 2021 seeking exemptions only in limited cases and on the basis of adequate justification. This will require resourcing and implementation of timebound and target-based measures to meet WFD targets. Plans for river basin management should be fully integrated with the National Climate Adaptation and Mitigation Plans provided under the Climate Action and Low Carbon Development Act 2015.

2. The government should immediately halt river dredging, clearance programmes, channelisation, arterial drainage schemes and provision of other works including rock armouring until it is demonstrated on a case-by-case basis that no more environmentally-friendly alternative is available.

3. The government should provide greater investment to wastewater treatment and put an end to the discharge of raw and poorly treated sewage.

4. The government should implement policies ensuring that all new buildings be required to include rainwater harvesting and storage engineered for use in flushing of toilets and washing.

5. The level of investment capacity necessary for Irish Water to achieve WFD targets needs to be identified and resourced. This requires targeting and resourcing the optimum amelioration impact that can be achieved by 2021 and identifying and justifying all derogations on a catchment-by-catchment basis.

6. Ireland’s agricultural expansion programme under the Food Wise 2025 plan should be paused until it has been demonstrated that it is consistent with meeting all relevant EU obligations. This measure should be complemented by the government leading a push to review and reform the EU Common Agricultural Policy so as to ensure policy coherence with environmental goals and targets. All policy and fiscal support measures for agriculture, forestry and aquaculture should be integrated with meeting WFD targets and objectives.

7. Peat harvesting should be halted by 2021 and strict regulation should be enforced until then. The recommendations of the 2011 Environmental Protection Agency’s 'Bogland' study should be used as the basis for the management of peatland areas with an amended National Peatland Strategy supported by adequate resources and timetabled actions. This should include targeted measures for the particular water bodies at risk for peat extraction.

8. In order to guarantee achievement of WFD targets, the government should ensure broad public awareness and participation in water planning, management and conservation at national, regional and local levels. This should include sustained public awareness campaigns. Existing stakeholder participation though RBD Management Groups and the Irish Water Stakeholder Forum should be strengthened in line with recent recommendations from the Sustainable Water Network (SWAN).
ENSURE ACCESS TO AFFORDABLE, RELIABLE, SUSTAINABLE AND MODERN ENERGY FOR ALL

At European negotiations, Ireland is known for consistently pushing to reduce ambition in overall climate and energy policy and targets and to reduce its own contribution to overall EU targets. This has led to a reputation as a ‘laggard’ on climate and energy policy at European level. Furthermore, due to its poor performance in meeting renewable energy targets, Ireland is now facing a likelihood of significant EU fines for non-compliance in the near future.

On a more positive note, pioneering legislation in 2017 banned the extraction of fossil fuels by means of hydraulic fracturing. Ireland became the fourth European nation to enact such legislation and joined only a handful of states and countries around the world with legislation preventing extraction of fossil fuels.

Under the National Renewable Energy Action Plan (NREAP), and in accordance with the Euro 2020 renewable energy goals, Ireland is committed to achieving 16 percent of its energy from wind, solar, biomass and other renewable sources by 2020. The White Paper ‘Ireland’s transition to a low carbon energy future 2015-2030’ sets out a framework to guide energy policy with the aim of reducing carbon emissions from the energy sector by 80-95 percent by 2050 (relative to 1990 levels).

As things currently stand, however, some 92 percent of Ireland’s energy is derived from fossil fuel sources, of which oil dominates the mix (48 percent) followed by gas (29 percent), coal and peat. Indigenous sources of energy are derived from peat harvesting, mostly from the midlands, gas from the Corrib Gas field, and renewable sources, mostly wind, with small amounts of hydro, biomass and waste recovery.

Ireland is far from achieving its renewable energy targets. The European Commission has highlighted that Ireland ranks 23 out of 28 countries in its progress towards renewable energy targets. Just 9.5 percent of Ireland’s energy came from renewables in 2016. The EC has also indicated that Ireland is among only four European countries not expected to meet its 2020 targets. If the current trend continues, only 13 percent of Ireland’s energy will be produced from renewables by 2020, as compared to the target of 16 percent (Indicator 7.2.1). It is noteworthy that, although the government’s VNR report recognises Ireland’s “mixed” progress towards EU 2020 targets, it provides limited detail on just how poorly Ireland is performing.

Ireland has also committed to delivering 40 percent of electricity from renewables by 2020. Similarly, it is bound to provide 12 percent of energy for heating and 10 percent of energy for transport, from renewables.

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137 Data from Sustainable Energy Authority of Ireland.
140 Indicator 7.2.1 Renewable energy share in the total final energy consumption.
by the same deadline. The most recent data show that, if current trends continue, it will miss all these targets. According to the Sustainable Energy Authority of Ireland (SEAI), the country’s current trajectory will see 37 percent of electricity and only 4.6 percent of transport energy coming from renewables in 2020.\textsuperscript{141} Although Ireland announced, in late 2017, its intention to launch a new Renewable Heating Support Scheme – including grants and operational support for transition away from fossil fuel heat systems - it is forecast that this will bring the share of heat energy produced from renewables to 9 percent by 2020, which is still well short of the EU target.

Ireland also set a target to end the sale of non-zero-emission cars after 2030, but progress thus far in this regard has been minimal, with electric vehicles accounting for only 0.5 percent of new sales in 2016 (see also SDG 9, SDG 11). Moreover, the country’s transport strategy does not cohere with its energy targets and is likely to impede progress in this regard.

\textbf{Wind} is Ireland’s largest source of renewable energy – accounting for 85 percent of renewable production in 2016 - and it also offers the greatest potential for further expansion. The government supports wind energy production through the Renewable Energy Feed in Tariff (REFIT), which provides a 15-year price guarantee for wind energy. While this scheme has now closed to new applications, the government is expected to unveil a replacement scheme in the near future. According to the SEAI, Ireland has the potential to generate enough electricity from wind to exceed domestic demand by 2030.\textsuperscript{142} Nonetheless, the country still relies overwhelmingly on imported fossil fuels for energy production.

Ireland has made moderate progress in improving \textbf{energy efficiency (Target 7.3)}.\textsuperscript{143} Losses in electricity generation and transmission stand at 17 percent.\textsuperscript{144} In accordance with the European Energy Efficiency Directive, Ireland set the target of improving energy efficiency by 20 percent (over 2009 levels) by 2020. At the end of 2016, just 12 percent of the target had been achieved, indicating that Ireland is unlikely to meet this target.\textsuperscript{145} A more ambitious target of 33 percent was adopted for the public sector, though progress had only reached 21 percent at the end of 2015.\textsuperscript{146} Reflecting improving energy productivity, the \textbf{intensity} of primary and final energy and of electricity requirements has been falling since 1990 (Indicator 7.3.1.).\textsuperscript{147} In 2016 it stood at 52 goe/€, 62 percent lower than 1990 levels, reflecting the increasing growth in high value added sectors such as pharmaceuticals, electronics and services.

Grant schemes supported 22,000 homes to undertake efficiency measures in 2016. However, between 80,000 and 100,000 buildings a year would need to be upgraded to meet the EU 2020 target and Ireland is projected to fall short of the target by four percent.

With \textbf{all the most important 2020 targets unlikely to be met}, attention is now shifting to new European and Irish targets for 2030 and beyond. Negotiations over individual country targets are ongoing at European level, but an EU target of 30 percent improvement in energy efficiency has been proposed.

In summary, despite adopting an ostensibly ambitious and progressive approach to sustainable energy, Ireland’s progress to

\begin{footnotesize}
\begin{enumerate}
\item \textsuperscript{143} Target 7.3 By 2030, double the global rate of improvement in energy efficiency.
\item \textsuperscript{144} Data from SEAI.
\item \textsuperscript{146} Ibidem.
\item \textsuperscript{147} Target 7.3.1 Energy intensity measured in terms of primary energy and GDP.
\end{enumerate}
\end{footnotesize}
binding targets and implementation of non-binding policy recommendations has been poor and there is a lack of political support to prioritise sustainable energy projects. This is particularly true in relation to support for sustainable travel measures (see SDG 11), which have been under-funded in repeated budgets, and outside of the capital, cycling and public transport options are extremely poor in general (see also SDG 9). The government’s VNR report offers wide-ranging affirmations about a forthcoming transformation of Ireland’s energy sector but gives almost no detail on how this will happen. At present there is virtually no state support for micro-generation technologies. The VNR report states that “community-based energy initiatives will emerge to facilitate and drive the energy transition” but gives no information about what will bring this welcome development about.

### Recommendations

1. The Office of the Taoiseach should lead a determined push to foster political will at all levels of government to transform Ireland’s energy sector and ensure all national, EU and SDG targets in the areas of renewable energy and energy efficiency, but most especially in the rapid elimination of CO2 emissions, are met. A timetable should be specified to achieve zero CO2 emissions in the energy system, within a stated maximum net cumulative CO2 budget, which is demonstrated to be consistent with Paris Agreement goals. Delivering on this CO2 mitigation requirement must be the overriding priority in all energy system policy measures.

2. The government should enact the Fossil Fuel Divestment Bill and ban future exploration for fossil fuels in Ireland, including in its territorial waters. It should immediately decrease domestic dependency on fossil fuels, phase out fossil fuel subsidies, and develop plans for replacing jobs and transitioning to a clean energy industry.
In accordance with the recommendations of the Citizens Assembly on Climate Change, the government should end all subsidies for peat extraction and instead invest in peat bog restoration and proper provision for the protection of the rights of impacted workers (see also SDG 15).

The government should implement robust and ambitious measures to incentivise a much more rapid transition to electric vehicles. Measures should include, but not be limited to, targeted help-to-buy schemes, reductions in motor tax for electric vehicles and lower or free motorway tolls. This should be supported by a nationwide investment in complementary infrastructure, including an expanded national network of fast charging points (see also SDG9).

The government should prioritise the expansion of public transport spending over new road infrastructure spending at a ratio of no less than 2-to-1 to facilitate the broader availability and uptake of public transport options with special attention to rural areas. The number of bus lanes, cycling lanes and park and ride facilities should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use (see also SDG9).

In accordance with the recommendations of the Citizens Assembly on Climate Change, the government should enable, through legislation, the selling back to the grid of electricity from micro-generation by private citizens generating electricity from solar panels or wind turbines on people’s homes or land at a price that is at least equivalent to the wholesale price. Where a developer is proposing a renewable energy project, they should be obliged to offer 20 percent of ownership to the local community through reasonably priced shares.
PROMOTE SUSTAINED, INCLUSIVE AND SUSTAINABLE ECONOMIC GROWTH, FULL AND PRODUCTIVE EMPLOYMENT AND DECENT WORK FOR ALL

The Irish Government currently occupies a Titular seat on the Governing Body of the International Labour Organisation. Being mindful of the leading role that the ILO plays in matters of decent work on the global stage, and Ireland’s repeatedly affirmed commitment to the SDGs, the government’s SDG implementation plan should include a commitment to champion the ILO’s work in tackling decent work deficits internationally.

Furthermore, there is a pressing need to ensure greater policy coherence between Ireland’s trade policies, its influence on global trade through its membership of the institutions of international governance, and its commitments under SDG8. In order to foster economic development in poorer countries, it must also, as a matter of urgency, take robust steps to reform Irish tax policies that facilitate tax abuse by multinational companies (see also SDG10, SDG17).

Ireland has ratified both ILO Convention 87 on Freedom of Association and Protection of the Right to Organise (1948) and ILO Convention 98 on the Right to Organise and Collective Bargaining. The rights to freedom of association and collective bargaining are also enshrined in Article 40 of the Irish Constitution, though there is no specific right to join a union. Other important provisions regarding labour and employment are contained in The Employment Equality Acts 1998 - 2015.

The country’s long-standing social partnership model – through which government, unions, the private sector and civil society had for decades taken a consensual approach to social and economic policy – was effectively dismantled during Ireland’s economic crisis.148 Despite the favourable assessment of Ireland’s labour market provided in the government’s VNR report, it must be emphasized that employment in the country was decimated by the crisis, with the unemployment rate soaring from 4.2 percent in January 2005 to over 14 percent in January 2011. The rate of long-term unemployment – meaning those unable to find work for over a year – doubled between 2009 and 2010. Those aged under-25 were particularly hard hit, with joblessness among this cohort peaking at 32 percent in early 2012.149 In 2016, one in six people - 15.9 percent - between the ages of 18 and 24 were NEET, neither in employment nor in education and training.

While the country’s economy has recovered, and unemployment levels have fallen back to 6.1 percent in January 2018, precarious

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149 All data from Central Statistics Office.
work has now become pervasive in the economy. It is very disappointing that the government’s VNR report fails to meaningfully address this issue, which has become a crisis within Ireland’s superficial economic recovery. A recent study carried out by the Irish Congress of Trade Unions found that in 2016, 7 percent of the workforce was in precarious employment, while 8 percent faced significant variations in their hours of work from week to week or month to month.\textsuperscript{150} Since 2008, the number of workers identifying as “part-time self-employed without employees” has risen by 34 percent. Meanwhile, the number of people in permanent full-time employment has not returned to pre-crisis levels. Further, more than half of those in temporary employment indicated that the reason they were not in a permanent job was because they could not find one.\textsuperscript{151} The Employment (Miscellaneous Provisions) Bill 2017, which is still making its way through parliament, contains limited provisions to tackle zero-hour contracts, but ignores the far more pervasive problem of ‘if and when’ contracts. This important fact is also omitted from the government’s VNR report. As highlighted by union and civil society organisations, and the National Human Rights and Equality Commission,\textsuperscript{152} it also contains significant legal loopholes.\textsuperscript{153}

Ireland also has one of the highest rates of low-pay in the developed world, and the level of ‘working poor’ – 5.2 percent in 2016 – has barely changed in recent years. Again, this issue is notable by its absence from the government’s VNR report. The most recent data from the OECD shows 24 percent of workers in Ireland experience low pay, meaning that, among industrialised nations, it is second only to the United States and Israel.\textsuperscript{154} Furthermore, this figure has been rising since 2004 when it stood at 17.6 percent.\textsuperscript{155} It must be noted that young people are particularly affected by the dynamics of both low-pay and precarious work in the Irish economy. A Red C poll commissioned by the National Youth Council in 2017 found that 47 percent of people aged 18-29 had employment contracts that did not provide full-time week-to-week hours, and 38 percent of young people were on temporary contracts. Research from the Nevin Economic Research Institute showed that almost 40 percent of young people were being paid rates at or below the minimum wage, which is not sufficient to ensure a minimum essential standard of living (see also SDG5).\textsuperscript{156}

While the rate of unemployment is lower among women than men, limited progress has been made on the gender pay gap (see also SDG5). On average, women are paid 14.4 percent less than men (Indicator 8.5.1).\textsuperscript{157} This pay gap is more severe than the OECD average of 14.1 percent.\textsuperscript{158} It also represents a pronounced rise on the gap of 8.5 percent recorded in 2012. The most recent Women in Work Index from Price Waterhouse Coopers, which analyses relative levels of unemployment, labour market participation and remuneration, ranked Ireland 25 out of 33 developed countries.\textsuperscript{159} This reality is exacerbated by occupational segregation, with women disproportionately represented in low-paid sectors such as personal services, accommodation and clerical roles.\textsuperscript{160} The European Commission has warned that Ireland is one of the few countries among

\begin{itemize}
\item \textsuperscript{151} Ibidem.
\item \textsuperscript{154} OECD database. Wage Levels. https://data.oecd.org/earnwage/wage-levels.htm
\item \textsuperscript{155} Ibidem.
\item \textsuperscript{156} Nevin Economic Research Institute, 2015, A Profile of Those on the Minimum Wage, NERI Working Paper, 2015/ No. 27.
\item \textsuperscript{157} Indicator 8.5.1 Average hourly earnings of female and male employees, by occupation, age and persons with disabilities.
\item \textsuperscript{158} OECD; Gender database.
\item \textsuperscript{159} Price Waterhouse Cooper, 2017, Women in Work Index. https://www.pwc.co.uk/economic-services/WWI/women-in-work-index-2018.pdf
\end{itemize}
its membership where the workforce is ‘re-segregating’. The exorbitant costs of childcare in Ireland – among the highest in the developed world – also contribute to women’s overrepresentation in part-time and precarious work (see also SDG5).

**Lone parents** are particularly exposed to precarious employment and working conditions because of the nature of their caring responsibilities. Their need for flexibility exposes them to ‘flexibilisation’, with traditional part-time and flexible work being replaced by precarious zero-hour, roll-over or exploitative self-employment contracts.

**People with disabilities** meanwhile face severe inequities in Ireland’s employment market (Target 8.5). A recent study by the Economic and Social Research Institute found that less than a third of those with disabilities are employed (Indicator 8.5.2) as compared to nearly 70 percent of people without disabilities. The same report found that, when other factors such as education and age were excluded, people with a disability were half as likely to enter employment as those without a disability. The Comprehensive Employment Strategy for People with a Disability sets the target of ensuring those with disabilities account for 6 percent of the labour market by 2024. The current level is 3.4 percent.

Meanwhile, a staggering 82 percent of Ireland’s **Traveller community** is unemployed. The severe discrimination experienced by this community in all areas of Irish life is explored further under SDG1, SDG2, SDG3, SDG4 and SDG10.

**Migrants** in Ireland are likewise met with pronounced impediments to equal participation in the workforce. Undocumented
migrants – estimated to be between 20,000 and 26,000 – are dramatically overrepresented in low-paid sectors and are subject to widespread discrimination and exploitation. Research by the Migrants Rights Centre has shown that, despite an extremely high rate of employment, almost half of participants were paid below the €300 per week threshold of low pay.167

The continuing discrimination visited on asylum seekers in this area is particularly urgent (Target 8.8).168 In January this year, Ireland’s Supreme Court ruled that the blanket ban on asylum seekers taking employment was unconstitutional. Following this ruling, and the government’s decision to opt into the EU Reception Conditions Directive, which ostensibly allows asylum seekers to find employment, highly-restrictive criteria on their access were implemented. These include that the position must pay over €30,000 per annum, and that it cannot be in one of 70 identified sectors, including retail, hospitality and social care. In June, these restrictions were lifted for those who have been in the State for nine months or more and have not had a first decision made on their refugee status. However, this means many asylum seekers who are appealing decisions on their status will not be eligible to seek work. Being mindful of the indivisibility of the right to work from other human rights such as health, education and minimum essential standards of living, current government policy in this area represents a broad attack on the human rights of asylum seekers. Given the continuing public controversy surrounding this issue in Ireland, it is worrying that it is not addressed in the government’s assessment of SDG8.

According to the most recent data from the European Union Statistics Agency, Ireland’s spending on social protection is among the lowest in Europe, with just 9.9 percent of GDP devoted to this area (Target 8B.1).169 This compares to an EU average of 19.1 percent.170

### Recommendations

1. Strong and effective legislation should immediately be passed and enforced to tackle ‘zero hour’ and ‘if and when’ contracts and reduce the impact of precarious employment on workers. If these issues are to be effectively provided for under the Employment (Miscellaneous Provisions) Act 2017, the act will have to be amended in line with the recommendations of trade unions and the Irish Human Rights and Equality Commission.

2. The Irish government should implement policies to tackle the pervasiveness of low-pay in the Irish economy. The national minimum wage should immediately be increased to €11.70 an hour, to ensure it is sufficient to deliver a minimum essential standard of living. Furthermore, wage and labour policies should seek to address the disproportionate representation of women in low-paid sectors. The sub-minimum rate of the minimum wage which particularly impacts on young people and new entrants to the labour market should be abolished. Targeted employment measures and increased investment in training and education programmes should be provided for young people.

3. Employer organisations and trade unions should be required to develop sectoral collective agreements and develop regulations customised to their sectors to confront gender inequality and discrimination in the workplace. The UN Guiding Principles on Business and Human Rights should be fully implemented, with a strong gender focus, and mechanisms put in place for consistent national monitoring.

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168 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.

169 Indicator 8B.1 Total government spending in social protection and employment programmes as a proportion of the national budgets and GDP.

170 Data for 2016, from Eurostat.
A robust and thorough implementation plan for the Comprehensive Employment Strategy for People with Disabilities should be designed and implemented in close consultation with disability rights groups. This should be led by the Department of Jobs, Enterprise and Innovation, and should include detailed provisions for supports targeting those with high support needs. It should be complemented by a sustained public awareness campaign on the importance of equal employment for persons with disabilities.

The right to work of asylum seekers and migrants should be immediately recognised and the draconian employment criteria attached to the EU Reception Conditions Directive removed without reservations.

The government should resource special initiatives for Traveller and Roma training and employment. This should be complemented by adequate allocations for gender-specific employment and training opportunities for women from socially excluded groups, including Traveller and Roma women.

The government’s long-term employment strategies must be future-proofed with a strong focus on green jobs and the circular economy. This will require broad and consistent engagement with the public to support the changes required for Ireland to become a more sustainable country across all SDGs.
BUILD RESILIENT INFRASTRUCTURE, PROMOTE INCLUSIVE AND SUSTAINABLE INDUSTRIALIZATION AND FOSTER INNOVATION

Over the past 20 years, Ireland has successfully established itself as a centre of high-tech industry and innovation. However, after years of austerity-driven spending cuts that saw much of Ireland’s infrastructure fall into disrepair, the country is facing an increasingly serious infrastructure deficit. Ireland’s long-term plans for infrastructural development are detailed in the recently-published Ireland 2040 strategy.

While the government’s VNR report provides detail on Ireland’s support to innovation, research and development, it largely avoids addressing the severe infrastructural deficits being seen in the country. Despite promising that the recently launched National Development Plan for the next decade takes account of social, environmental and economic needs, it does not give any detail on how this will be achieved.

As things currently stand, water infrastructure needs massive levels of investment if Ireland is to both meet its commitments under the EU Water Framework Directive and at the same time provide good quality drinking water to all its citizens.

Transport infrastructure is also a particularly pressing issue (Target 9.1). Capital investment in transport infrastructure peaked at 1.9 percent of GDP in 2008 before falling to half this amount in 2016. Ireland’s investment in this area over the long-term has averaged 1.13 percent of GDP, which is well below most other EU countries. Given that the cost of maintaining existing road and rail networks alone is estimated at €1.6 billion, it is crucial that plans to increase investment in transport are fully implemented in the years ahead. With the economy growing and the population expanding, the pressure on Ireland’s roads is rapidly becoming a crisis.

With Dublin now ranked as the fifth most congested city in the world by GPS firm TomTom, years of underinvestment in the capital city’s cycling network is also contributing to a ‘congestion crisis’. It is estimated that investment of €120 million per annum is needed for the roll-out of the Greater Dublin Area Cycle Network Plan between now and 2025, but so far budgetary allocations have been a fraction of this. Years of austerity have simultaneously hampered Ireland’s progress in transitioning to electric vehicles (see also SDG7, SDG 11, SDG 13).

Ireland’s waste infrastructure has also fallen victim to years of underinvestment and the pressure of a burgeoning economy and population (see also SDG12). Ireland found itself confronted with a residual waste crisis in 2016, and emergency regulatory measures had to be implemented to allow

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171 Target 9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.
173 Op cit 170.
for intensification at landfills. In this area, Ireland has failed to embrace the principles of a ‘circular economy’ with huge amounts of waste being exported for treatment abroad rather than being treated as a potential resource at home.\textsuperscript{175} \textbf{Energy infrastructure} is likewise outdated and in poor repair, a factor which contributes to Ireland’s poor performance on clean energy targets (see SDG7).

With regard to \textbf{communications infrastructure}, a marked divide in broadband coverage has emerged between rural and urban areas (Target 9.C).\textsuperscript{178} Having invested heavily in infrastructure targeted at bolstering the country’s flourishing tech sector, Ireland leads Europe in the integration of digital technology for business. It lags behind many other European nations when it comes to broadband provision to the wider population, however, ranking eighth on the European Commission’s Digital Economy and Society Index.\textsuperscript{177} This has led to an ongoing controversy over a ‘two-speed Ireland’. Given the growing importance of high-speed internet to modern farming, tourism and small and medium-sized enterprises, this deficit represents an impediment to broader economic progress as well as a frustration for those living outside the country’s five major urban areas.\textsuperscript{178}

\textsuperscript{175} Op cit 170.
\textsuperscript{176} Target 9C Significantly increase access to information and communications technology and strive to provide universal and affordable access to the Internet in least developed countries by 2020.
\textsuperscript{178} Op cit 170.
**Recommendations**

1. The government should increase investment in public transport to double the level spent on new road infrastructure to facilitate the broader availability and uptake of public transport options, with particular attention to rural areas. The number of bus lanes, cycling lanes and park and ride facilities should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use.

2. Investment in cycle paths should immediately be raised to €120 million per year in order to increase cycle networks nationally and ensure delivery of the Greater Dublin Area Cycle Network Plan and achieve a modal share of at least 10 percent by 2020.

3. The government should implement robust measures to incentivise a rapid transition to electric vehicles. Measures should include, but not be limited to, targeted help-to-buy schemes, reductions in motor tax for electric vehicles and lower or free motorway tolls. This should be complemented by nationwide investment in complementary infrastructure, including an expanded national network of charging points. The government should also set an ambitious target for transitioning public transport systems and the state’s vehicle fleet to full electrification by 2025.

4. Ireland should seek to rapidly decrease Ireland’s dependence on exporting residual and hazardous waste for treatment in other European countries through the development of indigenous waste treatment facilities. It should review existing policies and programmes, in close consultation with civil society, in order to ensure waste is treated as a resource in keeping with ‘circular economy’ principles. It should also vigorously promote the more effective collection and segregation of waste (see also SDG 12).

5. The government should prioritise the delivery of high-speed internet connection to all homes outside Ireland’s five major urban areas. Special measures should also be implemented to ensure the agriculture sector and rural businesses, especially small and medium-sized enterprises, are fully integrated into the digital economy.
While Ireland has been commended by the OECD and international NGOs for the poverty reduction focus of its overseas development aid, it simultaneously impedes the progress of many developing countries through its facilitation of aggressive tax planning by multinational companies (Target 10.B.1).\(^{179}\) In so doing, Ireland exacerbates inequality between countries even as its aid programme seeks to narrow the gap.

For example, Zambia – one of Irish Aid’s seven strategic partner countries – is estimated to have lost tax revenues equivalent to 40 percent of the aid it receives from Ireland thanks to the current tax treaty between the two nations.\(^{180}\)

Ireland also formed part of the European grouping that blocked the establishment of a global tax body under the auspices of the UN – one of the key objectives of developing countries – at the Addis Ababa Financing for Development negotiations in 2015. And despite acting in collaboration with its EU partners on that occasion, the country has consistently opposed European efforts to harmonise tax laws and improve tax transparency in the Union itself. It has also opposed European efforts to introduce a Financial Transactions Tax, a measure that has been repeatedly called for by development organisations and which could significantly bolster revenues for sustainable development.

Moreover, research by Christian Aid has shown that an international spillover analysis of Ireland’s tax policies carried out by the Irish government was fundamentally flawed, and its finding that Irish tax policies had little impact on developing countries was erroneous.\(^{181}\) Ireland’s facilitation of abusive international tax planning results in billions of dollars, which might otherwise be used to fund sustainable development, being funnelled away from state Treasuries in those countries.

These facts do not cohere well with the assertion in the government’s VNR report that it is committed to the Base Erosion and Profit Shifting (BEPS) project, along with country-by-country reporting and automatic exchange of tax information.

The 2014 report of the then UN Special Rapporteur on Extreme Poverty and Human Rights, Magdalena Sepúlveda, on taxation and human rights found that abusive international tax practices were a major determinant of inequality – both within and between countries – and a key impediment to sustainable development, particularly in the Global South.\(^{182}\) More recently, the current UN Special Rapporteur on Extreme Poverty and Human Rights, Philip Alston, emphasized that Ireland’s taxation policies undermine economic and social rights both within Ireland and internationally. With these facts in mind, the Irish government has a fundamental duty to reform tax policies that facilitate abusive practices and to champion international efforts to bring them to an end.

\(^{179}\) Target 10.B.1 Total resource flows for development, by recipient and donor countries and type of flow (e.g. official development assistance, foreign direct investment and other flows).

\(^{180}\) Christian Aid Ireland, 2018, Not Without Cost: The Impact of Ireland’s Tax Code on Developing Countries. https://www.christianaid.ie/news/tax-justice-1

\(^{181}\) Ibidem.

Key legal provisions to combat discrimination in Ireland are set out in the **Employment Equality Acts 2000-2015** and the **Equal Status Acts 2000-2004**. The former outlaws discrimination on nine grounds, whilst also prohibiting harassment, sexual harassment, and requiring appropriate measures for people with disabilities in relation to access, participation and training in employment. It further allows for positive action measures to promote equal opportunities on gender grounds, people over the age of 50, those with disabilities and members of the Traveller community. The Equal Status Acts 2000-2004 address discrimination outside the workplace in areas such as access to services and amenities. Socio-economic status is currently not recognised as a ground for discrimination in Irish equality legislation.

**Gross income inequality** – before taxes and social transfers are taken into consideration – is higher in Ireland than in any other EU country. While net income inequality stands close to the EU average, Ireland’s low-tax economy, together with the large impact of social transfers in reducing economic equality, makes it problematic to rely on simple measures of economic inequality.

It is notable that the government’s VNR report provides no specific data on recent trends in economic inequality in Ireland, nor the impact of austerity programs, relying instead on selected EU comparisons. The bottom 50 percent of people in Ireland saw their share of gross income fall by 2 percent between 2015 and 2017, while the top 1 percent saw their share increase by 27 percent. Average household expenditure among the bottom 40 percent went from €447.82 to €452.80 - a rise of barely 1.1 percent - between 2010 and 2015, while overall household expenditure rose by 3.3 percent over the same period. As such, Ireland is currently moving backwards on **Target 10.1**. Further, given that price levels increased by 6.3 percent over the same period, there was in real terms a decrease of 3 percent in average household consumption. In 2015-2016, the tenth decile enjoyed an average weekly spend of €1,700, as compared to €304 for the first decile and €396 for the second. Five years earlier, in 2009-2010, the figures were €1,716 (top decile), €354 (first decile) and €384 (second decile).

Also of note is the marked differential between expenditure among homeowners and those in public housing. Households in homes owned with a mortgage spent, on average, €1,157 per week, while those rented from local authorities spent only €411.14 per week. While some of this difference is accounted for by the larger size of mortgage-owned households, families in public housing are clearly being left behind. In 94 percent of households owned with a mortgage, at least one person is employed, while the figure for local authority households is just 34 percent.

Despite the existence of the equality legislation cited above, **discrimination** remains a pervasive and persistent problem in Ireland. Details regarding this continuing problem are absent from the government VNR report’s treatment of SDG10. Almost one in eight people in the country report having experienced some form of discrimination in the last two years (**Indicator 10.3.1**). Members of the **Traveller community** are ten times more likely to suffer discrimination while seeking work, and 22 times more likely to face such injustice when trying to access private services, than people who identify as ‘white Irish’.

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184 Ibidem.
185 Indicator 10.1.1. Growth rates of household expenditure or income per capita among the bottom 40 per cent of the population and the total population.
187 Data from Central Statistics Office.
188 All data from CSO.
189 Indicator 10.3.1: Proportion of the population reporting having personally felt discriminated against or harassed within the previous 12 months on the basis of a ground of discrimination prohibited under international human rights law.
According to a recent ESRI study, women are twice as likely as men to face discrimination at work. Similarly, persons with disabilities are twice as likely as those without to experience discrimination at work or when accessing private or public services. People who identified as black in the study face widespread discrimination. They are three times more likely than ‘white Irish’ people to experience it at work and in accessing private services, and four times more likely in public services. It also appears that the country’s economic crisis has fuelled a surge in employment discrimination, with the proportion of people experiencing discrimination while seeking work jumping from 5.9 percent in 2010 to 7.4 percent in 2014. Asylum seekers and refugees meanwhile live in a state of enforced poverty thanks to Ireland’s deeply regressive reception and support structures (see also SDG1, SDG 4, SDG 5).

Another important omission under SDG10 of the government’s VNR report is the fact that Ireland is a low-wage economy. The incidence of low-pay – defined as earnings for full-time employment that are below two-thirds of the median – has been rising since 2004 (see also SDG 5, SDG 8). Ireland’s rate of low-paid employment has now overtaken that of the UK. While a minimum wage of €9.25 per hour is protected by law, this is significantly below the rate of €11.70 needed to ensure a minimum essential standard of living according to the Living Wage Technical Group.

The proportion of GDP flowing to Labour has been declining in Ireland since the 1980s (Indicator 10.3.1). Although it improved in the immediate wake of the economic crisis as many companies saw their profits fall significantly, it has now resumed its downward trend and, while other sectors of the economy have rebounded, the recovery in wages has been very limited (see also SDG8). In 2016, labour’s share of GDP stood at 37.4 percent, as compared to 52.9 percent in 2009 and 46.5 percent in 2005. Indeed, when considered as a share of GDP, wages in Ireland are among the lowest in the developed world (see also SDG8). In 2015, Ireland ranked third from the bottom among 41 countries reported in the AMECO database, with wages accounting for just 44 percent of GDP, as compared to an EU average of 56 percent. This has been a long-running trend in Ireland – in 1980 wages accounted for 68 percent of Ireland’s GDP.

There is also a pressing need for more ambitious reforms of the state pension system in Ireland. With an ageing population and some 70 percent of those over 66 dependent on the state pension as their main source of income, the recently announced Pensions Roadmap Ireland represents a missed opportunity to meaningfully transform the current contributory system which reified inequalities in the country.

191 Ibidem.  
192 Ibidem.  
193 The categorisations used in the ESRI study were white Irish, white non-Irish, black, Asian, other, and Irish Traveller.  
194 Op cit 188.  
195 Op cit 188.  
197 Indicator 10.4.1 Labour share of GDP, comprising wages and social protection transfers.  
198 Data from UN Statistics.  
Recommendations

1. The Irish government should benchmark social welfare payments at a level adequate to both lift people above the poverty line and provide a minimum essential standard of living.

2. The government should review the current pensions roadmap and consider reorienting long-term plans to the provision of a universal state pension as a basic human right for all. It should implement the proposals of Social Justice Ireland regarding the national pension system in order to better ensure equality and sustainability of Irish pensions.

3. The government should ensure future budgets are fully gender-proofed and equality proofed. It should progressively increase Ireland’s tax take as a share of GDP and ensure additional revenues are channelled into employment programs, housing supports, increased social welfare and pension payments, so as to intensify the redistributive role of taxation in the Irish economy.

4. The government should strengthen asylum and immigration systems, protections and supports to ensure fair and efficient procedures. It should introduce a regularisation scheme for undocumented migrants, similar to the scheme that Ireland has called for in the US. It should ensure the extension of the Migrant Integration Strategy to all migrants, in order to provide basic supports including accommodation, health, education and welfare for all, regardless of people’s method of arrival or status in Ireland.

5. In its fiscal, employment and investment policies, the government should ensure better-paid work. The national minimum wage should immediately be increased to €11.70 an hour to ensure it is sufficient to deliver a minimum essential standard of living. Furthermore, labour and wage policies should seek to address the disproportionate representation of women in low-paid sectors.

6. Stronger enforcement of equality legislation should be prioritised, and broader access to free legal support delivered, so as to ensure anti-discrimination legislation is fully and robustly implemented.
Targeted legislation and complementary state programmes should be delivered to address the workplace inequalities and discrimination experienced by women, persons with disabilities, Travellers, members of ethnic minorities, migrants, older persons, and members of the LGBTQI+ community.

Adequate resources and supports should be provided to ensure compliance with the public sector positive duty to eliminate discrimination and promote equality at all levels.

Socioeconomic status should be legally recognised as a ground of discrimination.

Economic, social and cultural rights – including the right to an adequate standard of living – should be fully recognised in the Constitution.

International issues

Ireland should develop a transparent, well-resourced Policy Coherence for Development mechanism to identify and tackle inconsistencies such as relevant aspects of the country’s tax regime and greenhouse gas policies. The government, in close consultation with Irish Aid and civil society organisations, should also ensure policy coherence in its international relations, particularly with regard to fiscal policies, climate change policies, migration/refugees, peace, security, defence, and trade.

Ireland should act to ensure that the final Global Compacts on Migration protect existing rights, laws and practice within the EU and EU states, promote the explicit inclusion of the non-refoulement principle within the Global Compact on Migration, urge an end to the EU’s use of ODA for migration control purposes, and address the root causes of displacement and migration, including conflict, climate change, trade, financial and tax policies, in line with EU policy coherence for development commitments.

Ireland should support more democratic and transparent regulation and accountability mechanisms with regard to representation of developing countries in global economic and financial institutions, investment and financial flows, preferential trade arrangements for least developed countries, and regulation of global financial markets and institutions.
While the roots of Ireland’s recent economic crisis were multi-factorial, it is widely accepted that an unsustainable bubble in the housing market, fuelled by poor implementation of planning law, and financialisation and commodification of the housing sector, was a key driver. In its response to the crisis, the Irish government doubled down on further financialisation and commodification, however, by inviting private equity funds to buy up billions of euros worth of distressed mortgages at radically reduced rates through government-sponsored structures. Funding for social housing was simultaneously cut by 88 percent between 2008 and 2014. With these facts in mind, Coalition 2030 disagrees with the assertion in the government VNR report that Ireland’s performance under SDG11 can be considered favourable.

Rebuilding Ireland, the government’s strategy for addressing the housing crisis, depends almost entirely on the private sector to tackle problems in the provision of housing, in particular by privatising social housing and selling off public land for development. This combination of policies has led to the second housing crisis, in which the country now finds itself. Vulture funds have taken over some 90,000 properties in Ireland, equating to over €10 billion in assets, and a huge ‘build-to-rent’ industry has emerged. The government’s continuing reluctance to take a more state-driven approach, and thereby place human needs rather than the profit motive at the centre of its housing policies, has led to a situation in which many thousands of Irish families can no longer afford adequate housing (Target 11.1). Under the Rebuilding Ireland plan, most of the 134,000 social housing units to be delivered between 2016 and 2021 are to come from the private rental sector. Only 21,300 will actually be built by the state for social housing. This pattern reflects the state’s long-standing reluctance to have public ownership of adequate levels of social housing. This critically important reality, which is not directly addressed in the government’s VNR report, lies at the core of Ireland’s continuing failure to make meaningful progress on SDG11. In 2016, only 650 new homes were built, despite a pledge to deliver 2,200. In December 2017, it was revealed that only 809 of a promised 2,054 social housing units had been completed. As such, there is a pressing need for the Irish government to deliver affordable public housing. Just nine percent of Ireland’s housing stock is public social housing, as compared 32 percent in the Netherlands, 24 percent in Austria and 19 percent in Denmark. Overcrowding soared by 28 percent between 2011 and 2016, with 10 percent of the population now living in homes with more people than rooms (Indicator 11.1.1).
The problem is most acute in the capital city Dublin, where rents have gone up 65 percent since 2010.\textsuperscript{206} Underpinning this trend is a market in which demand is growing but very few new homes are being built. The country’s total housing stock grew by just 8,800 units – 0.4 percent – between 2011 and 2016.

Social welfare payments intended to support those on lower incomes in paying rent have strict limits which have not kept pace with the cost of renting in Ireland. As a result, just 12 percent of residential properties available for rent are accessible to people dependent on rent supplement or housing assistance payment.\textsuperscript{207} Similar obstacles face those who want to buy a home. The average price of a home in Ireland has gone up by 50 percent since 2013, with the cost of a home in Dublin soaring by just over 60 percent over the same period.\textsuperscript{208} Predictably, poorer households are impacted most by the lack of affordable housing. The poorest quintile of the population faces a housing cost overburden rate – defined as having to pay more than 40 percent of disposable income for accommodation – 20 times higher than that of the wealthiest quintile.\textsuperscript{209} While the overall proportion of mortgages in arrears has been declining slowly, 10 percent of residential mortgages in Ireland are still in arrears.\textsuperscript{210} Worthy of note is the contribution that is being made to the housing crisis by landlords taking buy-to-let properties back from tenants in order to sell or for family use, often at the behest of banks.

The most egregious manifestation of Ireland’s ‘new’ housing crisis is the soaring levels of homelessness being seen around the country. The latest data from the Department of Housing Planning, Community and Local Government show that there are now 10,000 homeless people in Ireland. This is more than three times the figure recorded in July 2014. The vast majority of households accessing emergency accommodation are lone-parent families – overwhelmingly headed by women – with the result that women and children are being disproportionately impacted (see also SDG 5). Many of Ireland’s homeless families are forced to live in commercial hotels, often

\textsuperscript{206} DAFT, Irish Rental Price Price Report Q1 2018.
\textsuperscript{209} TASC, 2017, A Home or a Wealth Generator: Inequality, financialisation and the Irish housing crisis. Calculated from data from Eurostat.
\textsuperscript{210} Data from Central Bank.
with entire families sharing a single room in squalid conditions.

Meanwhile, the number of **people sleeping rough** on the streets of Ireland reached record levels in 2017. In November, the Dublin Region Homeless Executive, which carries out a count of people sleeping in the streets of the capital every six months, found 184 people sleeping rough in Dublin. This figure rose from 142 in 2016 and 91 in 2015. By Spring of 2018 a decrease to 110 rough sleepers was recorded in Dublin, largely thanks to increased efforts and vigilance of those involved in the homelessness sector. At national level, in February 2018, 938 people between the ages of 18 and 24 were homeless in Ireland - this represents an increase of 94 percent in three years. It should also be noted that Ireland’s homelessness figures do not include the estimated 1,600 women and over 2,000 children who, over the course of 2016, stayed in **refuge facilities for victims of domestic violence**.

Similarly, the official statistics on homelessness exclude the 4,700 refugees and asylum seekers – including approximately 1,600 children – who are forced to live in Direct Provision centres where they are denied a variety of basic human rights (see also SDG1, SDG5, SDG10). Ireland’s Traveller community – long subject to severe discrimination in all areas of Irish society and life – are likewise excluded from homelessness figures. Data from the National Traveller Accommodation Consultative Committee shows that 5,500 members of this community - close to 20 percent of the total - are denied proper accommodation. It is disappointing that the government VNR report fails to address this situation under SDG11, despite it being a long-running and high-profile controversy.

Inadequate investment, together with increased economic pressure driving people to distant suburbs, is undermining quality of life in Ireland’s cities, particularly in Dublin (see also SDG9, SDG12, SDG13, SDG15). Longer commutes and increased car dependency are thus resulting in high levels of air pollution, particularly nitrogen oxide and particulate matter, with adverse health impacts. One of the key drivers of this problem – which is omitted from the government’s VNR report – is Ireland’s extremely high level of car dependency. Research by Eurobarometer shows that Ireland still has the second highest rate of car usage in Europe, with 73 percent of those surveyed using a car on a typical day. Only Cyprus, at 83 percent, shows higher car dependency. Despite the commitment in the Department of Transport’s ‘Smarter Travel – A Sustainable Transport Future’ plan to reduce work-related commuting in private vehicles to 45 percent by 2020, some 65 percent of commuters still travel to work by car and the figure continues to rise. The proportion travelling to work by foot or by bus has meanwhile fallen from 18 percent and 13 percent respectively in 1986 to 10 percent and 6 percent in 2016.

Thus, inadequate investment in public transport and green transport options is severely undermining the liveability of major cities, whilst also contributing to greenhouse gas emissions (see SDG9, SDG 13). Meanwhile, housing pressure together with poor planning is also exacerbating the lack of green spaces in Irish cities, which is particularly pronounced in lower-income areas in Dublin (Target 11.7). In this context, there is an urgent need for higher-density housing solutions in urban areas.

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212 Ibidem.
213 Data from Department of Housing, Planning and Local Government.
214 Department of Housing data from 2016.
217 Ibidem.
219 Ibidem.
220 Target 11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.
Recommendations

1. The government should introduce measures to increase the supply of new social housing stock – substantially beyond the level currently envisioned in Rebuilding Ireland - on the scale required to eliminate the current waiting list and meet the needs of lower-income sectors. As a precursor to this, it should explore all funding options and financing structures to generate sufficient capital to adequately finance the social housing need.

2. The government should ensure that the current commitments in the Rebuilding Ireland Action Plan are achieved at a minimum, and that more ambitious targets are set.

3. Targeted supports to vulnerable groups, including rental supports and anti-discrimination structures, should be strengthened with a strong focus on youth homelessness. Sustainable measures for the immediate elimination of homelessness should be designed and implemented in consultation with homelessness charities.

4. The government should prioritise the expansion of public transport spending over new road infrastructure spending at a ratio of 2 to 1. The number of bus lanes, cycling lanes and park and ride facilities should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use. The state should also take comprehensive steps to intensify the transition to electric vehicles.

5. The government should ensure adequate green spaces are protected or created within short walking distance of all homes in urban areas. Housing policy and systems for zoning decisions should be reviewed to promote a focus on higher-density accommodation provisions in urban areas so as to limit urban sprawl.

6. The Right to Housing should be explicitly protected in the Constitution or via adequate legislation.
ENSURE SUSTAINABLE CONSUMPTION AND PRODUCTION PATTERNS

Britain’s withdrawal from the European Union may have important ramifications for waste management in Ireland. The Environmental Protection Agency has warned that any changes to legislation and the border with Northern Ireland will significantly impact Ireland’s waste management systems and may impede progress towards targets.

This is largely due to Ireland’s high level of dependence on UK waste processing facilities, particularly for recycling glass and metal. Cross-border systems for oils, dry recyclables, electrical, electronic, and organic wastes are also likely to be affected. It is, therefore, crucial that the government prioritise the harmonisation of waste policies between Ireland and Northern Ireland in Brexit negotiations.

The current government waste policy – detailed in A Resource Opportunity: Waste Management Policy in Ireland - aims to achieve a recycling rate of 50 percent of managed municipal waste by 2020. This is complemented by a variety of waste prevention programmes, including Green Business, Green Health Care, Smart Farming, the Local Authority Prevention Network, and the Green Enterprise Grant Programme.

These programmes promote numerous local projects and businesses to support sustainable production and consumption. However, funding is limited and often on a year-to-year basis, which makes it difficult to plan for sustainable change. Additionally, the waste prevention office is not adequately resourced.

On a more positive note, the government has established Public Participation Networks in every local authority area to develop closer links between local decision-making and groups/organisations in the community, voluntary and environmental sectors. This has provided a useful forum to share experiences and activities promoting sustainable production and consumption.

It is disappointing that the government’s VNR report fails to recognise the profound problems that exist in waste management in the country. Ireland’s economic recovery, and the concomitant increase in economic activity, have fuelled increases in municipal and construction waste and with the country’s population expected to increase by over a million (from 4.8 million) by 2030, robust measures are needed to ensure EU and national targets of waste recovery and management are achieved.

Extremely high levels of domestic material consumption represent a serious threat to Ireland’s progress on SDG12 (Indicator 12.2.2). At the height of the economic boom in 2007, over 50 tonnes of material

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221 To find out more about Ireland’s Public Participation Networks, see: http://drcd.gov.ie/community/public-participation-networks/
222 Environmental Protection Agency, National Waste Statistics. Available at: http://www.epa.ie/nationalwastestatistics/
223 Indicator 12.2.2 Domestic material consumption, domestic material consumption per capita, and domestic material consumption per GDP.
(DMC) was being consumed per capita in Ireland – over three times the EU average and by far the largest of any country in the Union.\(^\text{224}\) Although the economic downturn significantly reduced this figure, in 2010 it was still the third highest per capita consumer of raw materials in the EU, consuming 25.5 tonnes per person as compared to an EU average of 16.5 tonnes.\(^\text{225}\) Levels of domestic material consumption have begun to rise again with the economic recovery.\(^\text{226}\) After six years of consecutive declines, household waste per capita grew from 315 kilos in 2013 to 331 kilos in 2014. This reality is omitted from the government report’s assessment of progress under SDG12.

Household recycling rates have remained static since 2012 (Indicator 12.5.1).\(^\text{227}\) If this trend doesn’t change, recycling targets for 2020 set out in the EU Waste Framework Directive may not be met.\(^\text{228}\) Similarly, litter and fly-tipping remains widespread, and current enforcement and sanctions appear to be ineffective. Further, Ireland is at risk of missing EU targets on recovery of end of life vehicles and tyres in particular.\(^\text{229}\)

**Food waste** continues to be a major concern in Ireland. According to the Department of Communications, Climate Action and the Environment, Ireland generates over one million tonnes of food waste each year, most of which is avoidable\(^\text{230}\) (Target 12.3).\(^\text{231}\) This implies a loss of €700 per household each year. While the number of households with a separate organic bin service has risen to 43 percent, behavioural issues in waste separation continue to impede effectiveness. The Stop Food Waste campaign has sought to change citizen behaviour in this arena through promotion and peer example, but there is a clear need for stronger incentivisation.

Production of **hazardous waste**, most of which is exported for treatment, is also rising significantly in Ireland. According to EPA statistics, the amount of hazardous waste produced in Ireland went up by 18 percent in 2016,\(^\text{232}\) due to a significant increase in contaminated soils (See also SDG 15).


\(^\text{225}\) Ibidem.


\(^\text{227}\) Indicator 12.5.1. National recycling rate, tons of material recycled.

\(^\text{228}\) Environmental Protection Agency, National Waste Statistics. Available at: http://www.epa.ie/nationalwastestatistics/


\(^\text{231}\) Target 12.3 halve per capita global food waste.

Recommendations

1. The government should significantly increase investment in waste infrastructure in Ireland (see also SDG9). As a matter of priority, the government should seek to rapidly decrease Ireland’s dependence on exporting residual and hazardous waste for treatment in other European countries. It should also ensure that the waste prevention office is properly resourced.

2. The government should promote the more effective collection and segregation of waste through the adoption of a deposit/refund scheme for drinks containers and through policy initiatives to curb the consumption of single-use unsustainable take away items and packaging, either through outright bans or through levies and other economic incentives.

3. The government should ensure full national provision of adequate street bins to collect recyclables. This should go hand-in-hand with the vigorous promotion of compostable packaging in order to keep waste streams uncontaminated. As a complementary measure, sustained investment in public education, awareness and engagement with new waste management systems is also needed.

4. Robust monitoring is required at all stages of the market chain, and in recycling, to tackle high levels of food waste. The government should ensure the target of reducing food waste by 50 percent by 2030, as set out in the Stop Food Waste programme, is achieved. Producers and retailers should be appropriately sanctioned for failing to meet targets set in the government’s Food Waste Charter.

5. The government should also increase funding, especially multi-year funding, for waste prevention actions and properly finance local community and business initiatives, drawing on the model of the Zero Waste Scotland programme. Sustained support is also required to reduce domestic material consumption rates, including through public awareness campaigns and educational programs.

6. The government should reform relevant tax policies to offer lower VAT rates for reusable items and items made with recycled content. A recycled content requirement should also be put in place for certain items to encourage uptake of secondary raw materials.

7. The government should enforce the "Polluter Pays Principle" with regard to all material cycles.

International issues

8. Ireland should seek synergies and complementarities between learning and experience in sustainable production and consumption at domestic level and Irish Aid’s continuing commitment to promoting sustainable production in smallholder agriculture in the developing world (see also SDG 2).
TAKE URGENT ACTION TO COMBAT CLIMATE CHANGE AND ITS IMPACTS

Ireland’s approach to combating human-induced climate change is set out in the 2015 National Policy Position on Climate Change and the Climate Action and Low Carbon Development Act (CALCD) 2015. Despite the affirmation in the government’s VNR report that the new National Planning Framework provides for coordination between areas such as housing, jobs, transport, energy and communications, it fails to recognise the manifest incoherence and incompatibility between current plans for agriculture and energy, on one hand, and environmental objectives, on the other.

On almost every criterion, the Irish government is thus far failing to deliver coordinated and coherent action commensurate with the scale of the climate change challenge. This is all the more concerning given that extreme weather events are already causing significant local impacts in terms of flooding, coastal erosion and storm damage in the country. Greater recognition by public agencies of the role climate change is playing in these extreme events does not appear to be informing strategic policy development (Target 13.2).  

Ireland’s consistent efforts to weaken its EU commitments on greenhouse gas emissions (GHGs) mitigation contribute to undermining ambition across the EU and beyond. It validates special pleading for reduced targets by other states. In its interactions with the EU, Ireland argues that increasing agricultural emissions are justified by greater efficiency per unit of food produced (beef and dairy), carbon leakage (import substitution) and the need to feed a growing global population. These arguments are all seriously flawed, being based solely on the short-term bottom line and ignoring ‘externalised’ social and environmental impacts globally. They only serve to protect the Irish agricultural sector’s overreliance on beef and dairy farming, which is highly-polluting and inherently inefficient.

Meanwhile, Ireland makes an extremely small contribution of US $5.4 million to the UN Green Climate Fund. At 60c per capita this is an order of magnitude less than comparable developed countries. Given Ireland’s status as a wealthy high-emitter, its responsibilities in terms of international solidarity are not being met. Development NGOs have been highly vocal in their criticism of this, especially given Ireland’s long-standing record in the field of humanitarian relief and assistance to developing countries.

It is widely acknowledged that no developed country has yet put in place policies that are commensurate with meeting the Paris Agreement temperature targets. As a small wealthy country, Ireland should show courage and leadership and push for greater ambition at the EU level, as well implementing much stronger national ambition. The Citizens’ Assembly (addressed below) has demonstrated that there is a popular mandate for such policies.

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Target 13.2 Integrate climate change measures into national policies, strategies and planning.
As part of its EU Effort Sharing responsibilities, Ireland undertook to reduce its 2005 greenhouse gas emissions by 20 percent by 2020. Insufficient action has been taken towards this target. While the government’s VNR report affirms that a reduction of 4 percent to 6 percent should be achieved, this data is outdated, and the most recent data shows that the reduction will be between 0 percent and 1 percent. Moreover, greenhouse gas emissions have been rapidly increasing since the end of the economic downturn (Indicator 13.2.1); and in the last two years, national total emissions have increased by 7.4 percent.

Ireland is judged to be the worst performing country in Europe on the Climate Change Performance Index. Fossil fuel combustion remains the principal source of GHG emissions in Ireland. In 2014, fossil fuels accounted for over 60 percent of emissions, with agriculture causing 32 percent and industrial processes just over 5 percent. While GHG emissions fell during the economic crisis – which devastated the construction sector in particular – they have been rising again with the recovery. Ireland’s current rising GHG emissions stand at 12.6t CO2 equivalent per person in 2014, with 8t CO2e coming from carbon dioxide. This means Ireland is lagging behind many other European countries, such as the UK, Denmark, Italy, Spain and France in terms of per capita GHG emissions. Ireland is one of only four EU member states not expected to meet its 2020 targets.

Ireland’s expected failure to meet these targets is driven by a projected rise of 6-7 percent in agricultural emissions from 2014 to 2020, and a 10-16 percent rise in transport emissions over the same period. These projections show that the gap between targets and actual greenhouse gas emissions will widen between now and 2020, and will continue to deteriorate thereafter. The management of peatlands in Ireland is also a major concern with regard to carbon emissions, as peat extraction and the change of peatlands to grasslands and forestry is fuelling significant rates of carbon loss (see also SDG7, SDG15).

The recently launched National Adaptation Framework (Target 13.1) sets out plans to identify vulnerable infrastructure, build new flood defences, make more efficient use of water resources and impose stricter regulations on building in flood-risk areas. The government estimates that it will need to spend €1 billion over the next decade to provide adequate flood defences.

Ireland’s National Mitigation Plan (NMP), launched last year, has meanwhile been criticised for its lack of clear targets or specifications of how greenhouse gas emissions will be managed or removed in order to meet national and international targets. Similarly, it fails to provide a timeline for phasing out of peat and coal use in electricity generation. Biomass including wood pellets can have very high carbon emissions, but Ireland is taking advantage of EU rules which falsely assume biomass is carbon neutral. This enables the continued use of peat in electricity generation by avoiding the carbon tax that would be due if full land use carbon accounting were undertaken. The NMP likewise ignores the need to change the structure of the Irish agricultural sector away from its dependence on beef and dairy, which are distinguished among food types as having the highest GHG intensity relative to nutritional value.

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235 Indicator 13.2.1 Foster climate resilience and low greenhouse gas emissions.
238 All data from Environmental Protection Agency.
240 Ibidem.
241 Target 13.1 Strengthen resilience and adaptive capacity.
While overall greenhouse gas emissions have been declining in recent years in the European Union, Ireland has resumed its pre-crisis trend of increasing GHG emissions.

The Irish government’s plans to radically expand agricultural production, particularly in beef and dairy, do not cohere with its stated commitment to reducing GHG emissions.

The Citizens’ Assembly addressed the topic of how to make Ireland a leader in tackling climate change. This government-sponsored Assembly, comprising 100 randomly selected citizens, delivered a list of well-formulated recommendations for mitigation, adaptation and fiscal measures to tackle climate change in the short and long term. The extent to which these recommendations - currently being considered by parliament - are implemented will provide a measure of national political will to tackle climate change.

**Recommendations**

1. The recommendations of the Citizens’ Assembly on how to make Ireland a leader in tackling climate change should be implemented in full.

2. An ambitious commitment to tackling transport and agricultural emissions is essential to achieving required emissions reductions. To this end, the Polluter Pays Principle must be applied to all sectors equally. The government must also design and enact timebound plans for the progressive reduction of the ruminant herd, promoting alternative agricultural practices with production of much lower GHG-intensity food types, along with complementary incentives and supports.

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3 The government should prioritise the expansion of public transport spending over new road infrastructure spending at a ratio of 2 to 1. The number of bus lanes and cycling lanes and park and ride facilities should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use. The rail network needs comprehensive upgrades with twin track lines on all intercity routes as a minimum, and electrification of all services. The state should also take comprehensive steps to greatly accelerate the transition to electric vehicles (see also SDG 9, SDG 11).

4 Future exploration for fossil fuels in Ireland, including offshore, should be banned. This should be accompanied by an immediate cessation of the burning of peat for electricity generation. As part of this rapid decarbonisation of the energy sector, a programme of retraining for workers currently engaged in highly carbon-intensive industries should be undertaken, thus ensuring a just transition. Passage of the Divestment Bill currently being evaluated in the Irish Parliament should be prioritised.

5 Current commitments under the 2030 EU Climate and Energy Framework are inadequate and must be reviewed, with a special focus on excessive flexibilities. Were Ireland to achieve its pledge of a 20 percent reduction by 2020, for example, the additional burden for 2020-2030 would, with forest and ETS credits on offer, amount to 0.6 percent. This is manifestly insufficient and unjust in a developed country with a long history of relatively high per capita emissions.

The most recent study from the Environmental Protection Agency shows that 79 percent of Irish coastal water bodies are of either ‘good’ or ‘high’ status (Target 14.1). For estuaries, however, this figure is only 31 percent. Chemical pollutants from land and sea-based human activities are driving this continuing deterioration (see also SDG 6, SDG12). Of 21 coastal or marine habitats designated under Annex I of the EU’s Habitats Directive (Target 14.2) only one - sandbanks - is assessed as ‘favourable’.

The government’s VNR report fails to address the serious levels of overfishing and destructive practices that are widespread in Ireland’s fishing industry. A report published by the New Economics Foundation has shown that Ireland has the worst record of overfishing (Target 14.4) in the European Union, Ireland has topped this table in both 2016 and 2018. The number of species being overfished has been going up consistently since 2012 – now standing at 23 percent - and the status of 38 percent of fish stocks remains unknown.

Fishing quotas for each country – called Total Allowable Catch (TAC) – are determined at the Agricultural and Fisheries configuration of the European Union. These negotiations happen behind closed doors and consistently allow quotas that far exceed scientific recommendations on levels conducive to the sustainability of stocks.

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245 Target 14.1 By 2025, prevent and significantly reduce marine pollution of all kinds.
247 Target 14.2 By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts.
248 Ibidem.
250 Target 14.4 By 2020, effectively regulate harvesting and end overfishing, illegal, unreported and unregulated fishing and destructive fishing practices.
252 Ibidem.
Ireland’s TAC for 2018 was 18 percent over the level that would be conducive to maintaining a maximum sustainable yield. This reflects over 31,000 tonnes of excess catch. It should also be noted that, at the EU level, the estimated overall TAC had been falling from 2015 to 2017 but rose again this year. In this context, there is an urgent need not only to reduce TAC quotas to sustainable levels, but also to democratise the process through which quotas are agreed. As things currently stand, the opaque nature of TAC negotiations leads inevitably to overfishing and will soon cause a collapse in fish stocks with concomitant socioeconomic ramifications. The assertion made in the government’s VNR report that fish populations are “generally improving” belies this reality. Article 2.2 of the European Common Fisheries Policy requires that fish stocks be restored to levels that will deliver the maximum sustainable yield by 2020. If the current trend continues, however, this goal will not be met by several EU nations, and Ireland is likely to be the worst offender.

Bottom trawling and dredging, which are associated with habitat loss and large quantities of unwanted by-catch, occur across most of the sea around Ireland. Sometimes these destructive actions are imposed on the marine biosphere more than once a year. It is therefore unsurprising that, of 74 fish populations studied in 2017, only 29 species were judged to be fished at sustainable levels.

While Ireland’s two seal species, five dolphin types as well as Harbour Porpoise and Long-finned Pilot Whale are listed as ‘favourable’, the status of other whale and dolphin species is unknown. Of the eight species of cartilaginous fish regularly occurring in Irish waters, six are ‘critically endangered’, five are ‘endangered’, six are ‘vulnerable’ and a further 19 are ‘near threatened’.

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252 Ibidem.
254 National Parks and Wildlife Service, 2016, Ireland Red List No. 11: Cartilaginous fish [sharks, skates, rays and chimaeras], Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
1. Targets to end overfishing, rebuild fish populations and properly protect marine ecosystems, as set out in the EU Marine Strategy Framework Directive and the Common Fisheries Policy, must be met. This will require effective regulation and enforcement of corresponding standards and guidelines. EU regulations concerning bycatch must be properly enforced with independent observers deployed to monitor large factory vessels.

2. Ireland should lead efforts to reform CFP negotiation processes, ensuring that they are democratised and adhere to transparency standards.

3. Harmful fishing practices, such as bottom trawling and the towing of small mesh nets in estuaries, should be radically curtailed or prohibited. Similarly, seismic blasting at sea, which is carried out in the search for fossil fuels, should be prohibited.

4. Provisions for Special Areas of Conservation and Special Protected Areas should be reviewed to ensure holistic protection of ecosystems. Furthermore, Ireland should immediately commence the process for Designating Marine Protected Areas (MPAs). In this regard, special attention should be given to ensuring MPAs are designated and protected to ensure biodiversity.

5. Rare and threatened species, such as sharks and rays, that are not currently listed in the EU Habitats Directive should be recognised and given proper legal safeguards. Similarly, the Wildlife Act 1976 (Amended 2000) should be reviewed and augmented to provide protection to threatened marine fish and invertebrate species.

6. The Irish government should make a clear commitment to achieve good status for all water bodies by 2021 seeking exemptions only in limited cases and on the basis of adequate justification. This will require resourcing and implementation of timebound and target-based measures to meet WFD targets. All policy and fiscal support measures for agriculture, forestry and aquaculture should be integrated with meeting WFD targets and objectives. (see also SDG6).
Although Ireland has a low level of biodiversity from a comparative biogeographic standpoint, it has globally significant populations of many species, including Leisler’s Bat, Greenland White-fronted Goose, and the Roseate Tern. Ireland also plays a significant role in supporting populations of migratory species in the North Atlantic region, such as wetland and wading birds which spend the winter in Ireland, and migratory fish including Lampreys, Atlantic Salmon and the European Eel, all of which spend part of their life cycle in Irish rivers. As such, Ireland has an international duty to significantly strengthen efforts – which have until now been weak – in protecting biodiversity and natural habitats under its jurisdiction.

Ireland’s principal provisions for the protection of ecosystems and biodiversity are set out in the Wildlife Act 1976 (Amended 2000) and the EU Habitats Directive. The former provides statutory protection for designated areas of high biodiversity, while the latter provides for the establishment of a network of Special Areas of Conservation (SACs) and the protection of specific species. The country’s 3rd National Biodiversity Action Plan was launched in 2017 for the period 2017-2021.

The main pressures driving this loss of biodiversity come from pollution and habitat loss due to agricultural expansion (see also SDG7, SDG13), forestry and fishing, mining, urban sprawl (see SDG11), climate change (see SDG13) and invasive foreign species. Of great concern to environmental groups is the fact that some 70 percent of the habitats and species recognised in the aforementioned EU provisions have been seriously impacted by agriculture. Pollution from agriculture and forestry-related activities is the largest threat to protected habitats and species.

256 Ibidem.
257 Ibidem.
Idea Mapping at ECO-UNESCO’s ‘Youth for the Future Summit’ October/November 2017. The Summit focused on how young people can help work towards achievement of the SDG’s.
The government’s current approach to forestry is a key concern with regard to biodiversity in Ireland (Target 15.2). Despite the assertion in the government’s VNR report that Ireland has seen a large increase in forest cover as a proportion of total land area, it remains very low - at 10.5 percent - when compared to other European countries. On average, forest cover in other EU states is three times greater, at 33.5 percent. Most importantly in the context of SDG15, forest cover in Ireland has barely changed in recent years. The rate of afforestation has fallen from 20,000 hectares per annum in the late 1990s to approximately 6,000 hectares at present. As such, afforestation in Ireland is now weaker than it has been in some decades. Research by the National Council for Forest Research and Development indicates that afforestation will have to more than double - to 15,000 hectares per annum - until 2030 to maintain the carbon sink function of Irish forests (see also SDG13). Unfortunately, the Irish government has a long record of falling short on afforestation targets. The long-term plan for forestry - Growing for the Future - set the target of planting 25,000 hectares per annum from 1996 to 2000 and 20,000 hectares thereafter until 2030.261

There is also a pressing need to move away from mass plantation of non-native commercial conifers such as Sitka spruce - which are generally intended for clear fell - and towards continuous cover practices using native broadleaf species. The analysis offered in the government VNR report, which promises “higher support for broadleaf planting”, neglects to mention the worrying trends of recent years. A study by the Environmental Protection Agency found that from 2000 to 2012, the rate of deforestation of broadleaf forests was considerably higher than in mixed and conifer-dominated forests. This pattern is concerning given that broadleaf forests now account for only 25 percent of national forest cover.262 The conservation of old-growth forests plays an essential role in maintaining biodiversity and, thanks to the greater levels of carbon they store in soils, in achieving targets on climate change mitigation.263

Another area of major concern in Ireland is the continued destruction of environmentally important peatlands. It is disappointing that this issue is not meaningfully addressed in the government’s VNR report, save for a cursory reference to plans “outlining a way forward”. This essential environmental resource, which covers 15 percent of the country, underpins unique wetland ecosystems (Target 15.1)264 and stores up to 30 percent of total soil carbon. It is estimated that only 21 percent of Ireland’s peatlands remain intact, as turf cutting, industrial peat extraction, commercial afforestation and urban sprawl eat away at what remains. The Irish Peatland Conservation Council reports that 40 percent

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259 Target 15.2 By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.
263 Open letter from 190 scientists to EU Parliament regarding EU Climate Policy on Forests, 2017. https://drive.google.com/file/d/0B9HP_R4_eH0UHd2UltZEBgQW/view
264 Target 15.1 By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.
of the country’s peatland resources have already been lost to turf cutting for domestic use.\textsuperscript{265} Despite this being arguably the single greatest loss of natural habitat in the country, management plans have only been prepared for 6 percent of sites considered to be of conservation value.\textsuperscript{266}

The NPWS also notes that \textit{invasive and non-native species} are increasing in all environments (\textbf{Target 15.8}).\textsuperscript{267} Species such as the Grey Squirrel, American Mink and Black Rat are among 48 invasive species considered to be posing a high risk to terrestrial ecosystems in Ireland.\textsuperscript{268} It must also be emphasized that \textit{climate change} is having an increasingly serious impact on biodiversity and natural habitats in Ireland (\textbf{see also SDG13}). This is particularly pronounced in coastal and upland habitats.\textsuperscript{269}

\section*{Recommendations}

\textbf{1} The Irish government should ensure all provisions set out in the Wildlife Act 1976 (Amended 2000), the EU’s Birds and Habitats Directives and the EU Water Framework Directive are fully and consistently implemented and enforced. This will require significantly increased resource allocations to the National Parks and Wildlife Service, which is currently funded at a level far below that needed to deliver broad compliance.

\textbf{2} The government should, in close consultation with the environmental sector, design and implement robust policies for the protection of natural parks and other ecosystems that fall outside of the EU’s Natura 2000 Network.

\textbf{3} The Irish government should provide greater investment to wastewater treatment and put an end to the discharge of raw and poorly treated sewage (\textbf{see also SDG6}).

\textbf{4} Ireland’s agricultural expansion programme under the Food Wise 2025 plan should be paused until it has been demonstrated that it is consistent with meeting all relevant EU obligations. This measure should be complemented by the Irish government leading a push to review and reform the EU Common Agricultural Policy so as to ensure policy coherence with environmental goals and targets (\textbf{see also SDG6}).

\textbf{5} Ireland should review current forestry policy and transition from an approach based on monoculture plantations to one with much greater focus on native woodlands and continuous tree cover.

\textbf{6} Peat harvesting should be halted by 2021 and strict regulation should be enforced until then. The recommendations of the 2011 Environmental Protection Agency’s ‘Bogland’ study should be used as the basis for management of peatland areas with an amended National Peatland Strategy supported by adequate resources and timetabled actions. This should include targeted measures for the particular water bodies at risk from peat extraction (\textbf{see also SDG7, SDG13}).

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{266} The government has moved to protect and better manage Ireland’s peatlands though the 2015 National Peatlands Strategy and the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022, but progress to date has been limited.
\item \textsuperscript{267} Target 15.8 By 2020, introduce measures to prevent the introduction and significantly reduce the impact of invasive alien species on land and water ecosystems and control or eradicate the priority species.
\item \textsuperscript{268} O’Flynn, C., Kelly, J., Lyons, L., 2014. Ireland’s Invasive and Non-Native Species: Trends in Introductions.
\item \textsuperscript{269} Gleeson, E., McGrath, R., Treanor, M., 2013, Ireland’s Climate: The Road Ahead. Dublin.
\end{itemize}
\end{footnotesize}
PEACEFUL AND INCLUSIVE SOCIETIES, ACCESS TO JUSTICE FOR ALL

In an increasingly insecure world, in which basic human rights principles that once enjoyed broad international consensus are under siege, it is critically important that Ireland redouble its commitment to peace, security and human rights. Of particular concern to Coalition 2030 are the retrogressive trends unfolding with regard to prevention of gender-based violence, private sector accountability, and protection of civil society space.

The forthcoming Irish Aid White Paper is expected to include a new focus on peace and security and this is welcome. Irish Aid has also committed to increasing its funding to the protection of women and girls in emergency and post-crisis contexts. That said, funding to combat gender-based violence remains meagre, particularly in humanitarian crises. In 2015, just 0.5 percent of Ireland’s humanitarian funding was spent on addressing gender-based violence. In this regard, Ireland must meet commitments made regarding violence against women at the World Humanitarian Summit and in the European Union’s Call to Action on Protection from Gender-based Violence in Emergencies.

On a related note, impunity for human rights violations by governments and corporate actors have become more prevalent on a global scale. In this context, it is critically important that the UN Guiding Principles on Business and Human Rights be fully implemented in all countries. Given that Ireland has a strong record as an international champion for civil society space and the protection of human rights defenders, it is well-placed to take a leadership role in promoting strong human rights accountability for the private sector.

Furthermore, if Ireland is to engage meaningfully with peace, SDG16 should not be seen in isolation. It has strong links with other goals, in line with the integrated and indivisible nature of the agenda. Ireland needs to clearly articulate its contribution to peace in its White Paper and work with bilateral and civil society partners to ensure all targets are implemented to ensure peaceful, inclusive and just societies.

In this regard, it is also noteworthy that Ireland is currently bidding for a seat on the UN Security Council. Should it be successful in this endeavour, it should make reform of the Security Council, to make it more democratic and representative of developing countries in particular, a key policy priority (Target 16.8).

Ireland is a relatively safe country, with low levels of homicide and assault (Indicator 16.1.1). Perceptions of crime, violence and vandalism are all below EU averages. That said, it should be noted that while incidence of homicide and most other violent offences have been falling, there has been a consistent increase in sexual offences in recent years.

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271 Target 16.8 Broaden and strengthen the participation of developing countries in the institutions of global governance.
272 Indicator 16.1.1: Victims of intentional homicide per 100,000 population, by sex and age
of systemic corruption, it ranks behind many other advanced economies in this regard **(Indicator 16.6)**. Its failure to police financial institutions - which significantly contributed to the collapse of the country's banking sector – along with persistent controversies over corruption in national planning, have damaged public perceptions of related state structures and institutions. Access to justice in Ireland was severely undermined by successive cuts to legal aid services during the economic crisis. In the context of increasing demand for such services in areas such as debt, housing, social welfare and employment, this had a deeply retrogressive impact on many of Ireland's most vulnerable households. Waiting lists for appointments for Legal Aid Board Centres rose sharply throughout the period. Between 2007 and 2011, the number of applications for legal services from these centres increased by 84 percent, from 10,164 applications to 18,657. As a direct result, waiting times for consultations increased exponentially, with many applicants being forced to wait over six months for a consultation. While these waiting times have abated somewhat in recent years, they have not yet been restored to pre-crisis levels. As such, access to justice was one of the biggest victims of Ireland's austerity measures. Furthermore, groups suffering discrimination, such as Travellers and those living in Direct Provision face additional obstacles in accessing justice, which further compounds their marginalisation (see also **SDG10**). Aside from a promised review of the administration of civil justice in Ireland, there is no mention of access to justice under SDG16 of the government's VNR report. Of particular concern in Ireland is the narrowing of space for **civil society participation** in the country's political and economic life. In keeping with worrying global trends in this regard, Ireland has seen a sustained attack on civil society's crucial role in the flourishing of healthy democracy **(Target 16.7)**. As explained in **SDG8**, the country's social partnership model was dismantled during the economic crisis. Added to this, over the past 10 years support to programmes and infrastructure for political participation by communities and groups, particularly at local level, has been decimated. Public funding to non-governmental organisations fell by 41 percent in the period from 2008 to 2014, with the total employment in civil society organisations falling 31 percent by the end of 2015. This crucial issue is not addressed under SDG16 in the government's VNR report, despite affirmations in both that document and the SDG National Implementation Plan stating the government's commitment to proactively fostering such engagement. In its evaluation of Ireland's international efforts to support SDG16, the government VNR report further recognises that "civil society space has come under increasing pressure in many parts of the world" and declares that "protection of civil society space is amongst Ireland's foreign policy priorities". **Public Participation in environmental decision-making** is provided for under the Aarhus Convention and corresponding EU legislation but is poorly implemented in many cases, with the government frequently ignoring its own clear guidelines. This greatly hinders civil society participation. Moreover, public **access to information** is key to.
the functioning of a democratic society, but despite the existence of legislation, access to environmental information under the Access to Information on the Environment Regulations (AIE)\(^{284}\) is often fraught with delays and failures within public authorities. Delays in appeals to the Office of the Commissioner for Environmental Information means that information requested may take more than a year to access.

The provision of quality, regularly updated and **fully disaggregated data** is crucial to the functioning of a healthy democracy and to the delivery of Agenda 2030. While Ireland’s Central Statistics Office carries out regular surveys on a broad spectrum of social, economic and environmental themes, this is not sufficiently disaggregated according to age, gender, ethnicity, disability, sexual orientation, socio-economic status, and religion. Furthermore, data is not provided in a sufficiently timely manner, with the latest available data for many SDG-relevant indicators dating from 2012 or 2013.\(^{285}\) Civil society therefore faces marked limitations in evaluating progress over time. In this context, delivery of the pledges on open and timely data set out in the government’s VNR report are particularly urgent.

Another factor impeding the work of civil society is the **2001 Electoral Act**, which imposes strictures on ‘third parties’ accepting donations of over €100 for ‘political purposes’ (Target 16.10).\(^{286}\) The vague wording of the law means it can be applied to a wide range of civil society organisations and effectively results in a blanket ban on foreign funding in a country where, thanks to the economic crisis, the vast majority of independent human rights funding comes from abroad. The European Fundamental Rights Agency is among the bodies that have decried the expansive manner in which this law has been deployed.\(^{287}\) As investigations under the Electoral Act can be triggered by complaints to the corresponding regulatory body,
there are also concerns that it can be used nefariously to target specific organisations. Further, members of Coalition 2030 report that consultations with civil society on key policy issues have become largely formulaic and have little meaningful impact.

With regard to Ireland’s performance under SDG16, it must also be noted that discrimination in various forms remains a persistent problem and that women are underrepresented in political life at all levels (see also SDG5, SDG10). Being mindful of the demographic changes that have taken place in the country in recent years, it is also concerning that migrant communities are not better represented in politics and decision-making (Target 16.7).288 Twelve percent of people living in Ireland are now of non-Irish background, but of the 949 Councillors spread across the country’s 31 local authorities, only two are migrants. There is only one member of parliament – a naturalized Irish citizen – who comes from a non-Irish background.289 While a new programme to support better political integration of Ireland’s large migrant community into the political life of the country was recently announced, impact cannot be determined as yet.

**Trafficking of human beings** is also a growing concern in Ireland (Target 16.2).290 In 2016 the Gardaí (Ireland’s police force) reported 95 cases of human trafficking, compared to 78 in 2015 and 46 in 2014.291 The Council of Europe reports that the majority of these victims were trafficked for sexual exploitation. Between 2012 and 2016, 63 percent of identified victims – reflecting 197 individuals - were female and 94 were children.292 While the government has been commended for updating and amending relevant legislation, there is a pressing need for more robust enforcement and victim support measures to confront this growing problem.

It would be remiss not to note that continuing difficulties in the negotiations over **Great Britain’s exit from the European Union** have raised significant concerns over the return of a ‘hard border’ between Northern Ireland and the Republic of Ireland. Should Britain, the EU, Ireland and the various Northern Irish parties fail to find an effective solution to this challenge, there is a real danger that political violence may return to Northern Ireland. As things currently stand, tensions in Northern Ireland are rising, in part thanks to the ongoing failure to restore the power-sharing Executive in Stormont which collapsed in January 2017.

### Recommendations

1. **Access to justice for all people living in Ireland, particularly those from marginalised sectors, should be guaranteed.** To this end, sufficient resources should be provided to Legal Aid Board Centres to eliminate waiting lists and provide prompt consultations and support to all applications.

2. **The Department of Justice must take robust steps to identify the causes of rising rates of sexual violence in Ireland.** The Criminal Law (Sexual Offences) Bill 2015 should be strengthened and the Council of Europe Convention on Combating Violence against Women, which Ireland signed in 2015, should be promptly ratified. The proposed national network of contact centres for victims of sexual and domestic violence should be fully resourced.

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288 Target 16.7 Ensure responsive, inclusive, participatory and representative decision-making at all levels.


290 Target 16.2 End abuse, exploitation, trafficking and all forms of violence against and torture of children.


292 Ibidem.
3. The government should restore domestic funding to non-governmental organisations and local community organisations to pre-crisis levels and rebuild a national partnership approach to policy development and implementation, effectively dismantled during the economic crisis. It should redevelop the independent community development infrastructure, also dismantled during the crisis, and implement a multi-annual funding approach as the standard for all independent community development and community and voluntary programmes. State-funded projects and programmes implemented by community, voluntary and local development organisations should include a model for full cost recovery, including the cost of compliance and relevant overheads and administration costs.

4. The government should adopt an agreed set of values and principles for collaboration and partnership at national and local levels. It should also develop values and principles to support implementation of best practice guidelines, protocols and benchmarks for engagement, participation and consultation, including review and redevelopment of these guidelines and principles. The government should develop and implement a Framework for Participatory Governance across all departments and agencies.

5. The government should ensure that supports available to business start-ups and other supports are extended to social and community enterprises, community organisations and voluntary organisations that are appropriate to their mission, and develop, resource and implement a plan to deliver governance and capacity building for community groups and organisations.

6. The government should conduct a review of the appropriateness of regulatory compliance requirements facing civil society organisations and develop and implement a process for reducing, streamlining and standardising of all regulatory reporting, monitoring and compliance requirements for statutory funded programmes. The 2001 Electoral Act should be reviewed and guidance on implementation and enforcement provided so as to prevent it being misused or applied in a manner that impedes the necessary work of civil society organisations.

7. Increased resources should be allocated to community development programmes, especially resources for autonomous organisations representing people experiencing poverty and social exclusion, to ensure their participation in decision-making. The government should further invest in young people’s capacities, agency and leadership through substantial funding support, network-building, training and education.

8. The Gardaí, under the guidance of the Department of Justice, should vigorously investigate and prosecute suspected offenders of both sex and labour trafficking. Mechanisms to improve victim identification and referral should be strengthened, especially with regard to children and asylum-seekers. Victims should be exempted from penalisation for crimes committed as a result of being subjected to trafficking and specialised accommodation, particularly for women and children, should be established as a matter of priority.
Ireland should fully implement the Irish National Action Plan (NAP) on Business and Human Rights. A roadmap and timeframe for implementation should be committed to immediately.

Ireland’s Central Statistics Office should be resourced and mandated to ensure all relevant data collection is fully disaggregated according to age, ethnicity, gender, disability, sexual orientation, socio-economic status, and religion, and is provided in a timely and fully transparent manner.

The government should fully implement the provisions of the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

International issues

Ireland should continue its promotion of peace, security and human rights through active and sustained support to international human rights bodies and bilateral and multilateral peacebuilding efforts. It should prioritise leading by example in the implementation of related benchmarks and guidelines, including the UN Guiding Principles of Business and Human Rights. Should the country prove successful in winning a seat on the UN Security Council, it should make reform of the Council to make it more democratic and representative of developing countries a key policy priority. It should also act through its membership of the institutions of international governance to advance the democratisation of these to better represent and support developing countries.


Through its membership of the institutions of international governance, including the UN, EU, World Bank, International Monetary Fund and World Trade Organisation, Ireland should champion stronger participation of civil society in all levels of political decision-making. It should also push for robust protection of human rights defenders in national contexts.
Despite the consistent high-quality programming and engagement in international fora facilitated by Irish Aid, Overseas Development Assistance to developing countries stood at only 0.3 percent of GNI in 2017, which is less than half of the 0.7 percent commitment agreed to by OECD member states in 2000 (Target 17.2). This level of commitment is significantly below the EU average of 0.5 percent of GNI in 2017. A number of countries including the UK have already reached the 0.7 percent target and are maintaining it year on year (see also SDG1). Resource allocation to ODA were severely reduced during the country’s economic crisis. From a peak of 0.59 percent in 2008, it was slashed by nearly 20 percent in 2009 and, following three more years of successive cuts, it stood at just 0.24 percent in 2012. The Irish Aid programme needs to grow in quantity, but also maintain its quality and integrity. While ODA alone will not solve the complex set of issues outlined in Agenda 2030, it is a vital lever for reaching the poorest of the poor.

To achieve the SDGs, Irish Aid’s programme needs to continue to strengthen its relationship with, and support to, civil society, including Irish development NGOs, and to ensure an enabling environment to allow civil society to flourish. Civil society is under attack in many of countries but continues to have an important advocacy role to hold duty bearers to account and to enable pro-poor sustainable policies that allow people and the planet to flourish. It also continues to play a vital role in ensuring good governance.

Another critical area where Ireland is failing with regard to SDG17 is policy coherence (Target 17.14) particularly in the fields of greenhouse gas emissions (see SDG13) and tax policy (see SDG10).

Ireland needs to urgently develop a transparent, well-resourced Policy Coherence for Sustainable Development mechanism to identify and tackle inconsistencies such as relevant aspects of the country’s tax regime and greenhouse gas policies. Another example would be to ensure policy coherence in its international relations, particularly with regard to fiscal policies, climate change policies, migration/refugees, peace, defence and trade.

Although Ireland has engaged with the international tax reform agenda at the OECD and taken steps to address some of its most egregious tax avoidance schemes such as the ‘Double Irish’, which facilitated the transfer of intellectual property royalties to tax havens in the Caribbean, it continues to facilitate aggressive tax avoidance by multinational companies. Crucially, the ‘Double Irish’ has been effectively replaced by the ‘Single Malt’, which enables companies to redirect profits to other states with which Ireland has double taxation agreements, but which do not have any corporate tax. Furthermore, tax incentives on intellectual property provided to multinational companies, together with the poor application of withholding tax on royalty payments leaving Ireland, facilitates international firms in avoiding contributing to public funds. A spillover analysis of the international impacts of Ireland’s tax policies has meanwhile been shown to be significantly flawed.

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293 Target 17.2: Dedicate 0.7 per cent of ODA/GNI to developing countries and 0.15 to 0.20 per cent of ODA/GNI to least developed countries.
294 Target 17.14 Enhance Policy Coherence for Development.
It must also be emphasised that, despite assertions in the government’s VNR report that Ireland “strongly supports the OECD’s role in strengthening intergovernmental efforts to develop global norms on taxation”, the Irish government has in reality taken a proactive role in impeding international efforts to tackle tax avoidance (Target 17.16).\(^{297}\) Ireland has been a long-standing opponent of EU efforts to require multinational companies to make country-by-country reports public available. Despite its stated commitment to ensure tax reforms benefit developing countries,\(^{298}\) it has also opposed the establishment of a global tax cooperation body under the auspices of the United Nations. Such a body would enable developing countries to engage with wealthier nations on an equal footing, and could play a critical role in delivering sufficient resources for the implementation of Agenda 2030 to the countries where such resources are most needed. Closely related to this is the continuing problem of Illicit Financial Flows (IFFs), which syphon resources away from development efforts in many countries. The lack of an internationally agreed definition of IFFs inevitably impedes progress towards Target 16.4,\(^{299}\) Target 16.5,\(^{300}\) and Target 17.1.\(^{301}\)

Ireland is also falling short in provisions for meaningful partnership for the SDGs at the domestic level. The National Implementation Plan\(^ {302}\) (NIP) for the SDGs included a provision to establish a national stakeholder forum including civil society and community groups, the private sector, trade unions, the agriculture sector, youth, academia, the education sector, and local and national government bodies (Target 17.17).\(^ {303}\) While the first meeting of the Forum has taken place, details regarding the mandate and authority have yet to become clear. It is also concerning that national implementation of the SDGs remains under the auspices of the Department of Communications, Climate Action and the Environment, rather than the Office of the Taoiseach (Prime Minister).

\(^{297}\) Target 17.16 Enhance the global partnership for sustainable development.


\(^{299}\) Target 16.4 By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime

\(^{300}\) Target 16.5 Substantially reduce corruption and bribery in all their forms

\(^{301}\) Target 17.17 Encourage and promote effective public, public private and civil society partnerships, building on the experience and resourcing strategies of partnerships


\(^{303}\) Target 17.17 Strengthen domestic resource mobilisation, including through international support to developing countries, to improve domestic capacity for tax and other revenue collection.
While the NIP includes commitments to document the SDG to which each government policy relates, along with a matrix of lead and stakeholder departments, it is weak on specific details or a meaningful roadmap for implementation. Its commitment to deliver a new Sustainable Development Strategy within two years suggests that the NIP is in essence a ‘plan to make a plan’. Three years on from the agreement of Agenda 2030, such slow progress in developing a clear time-bound programme for SDG implementation along with targets and meaningful systems for accountability and review, is disappointing.

**Recommendations**

1. The government should establish a predictable, multi-year roadmap towards achieving 0.7 percent GNI budgetary allocation to overseas development aid. It should further reaffirm that Ireland’s ODA remains fully grant based, untied and focused on ‘leaving no-one behind’. Increases in aid must also be matched by a strong commitment to a definition of ODA that ensures that it is targeted solely at poverty alleviation and underpinned by respect for good donorship, accountability, human rights and transparency. As such, Ireland will need to remain staunch in the defence of this definition and to continue to target its funding accordingly.

2. As part of the National SDGs Implementation plan, the government should strengthen a ‘whole-of-government’ approach to the SDGs. Responsibility for oversight of SDG implementation should transferred to the Office of the Taoiseach. The government should also take steps to ensure strong horizontal alignment between different levels of policymaking and implementation, vertical alignment with Local Authorities, and continuous monitoring.

3. The National Stakeholder Forum on SDG Implementation should clarify its mandate and adequate resourcing must be guaranteed. It should include clear timeframes to ensure recommendations are properly incorporated into government policy and mainstreamed across all relevant departments. Systems should be put in place requiring the government and/or state bodies to provide justification for non-implementation of NSF recommendations where this occurs. The government should also provide adequate resources for training and education around the country to facilitate engagement and participation at local level.

4. Ireland should also rapidly develop a transparent, well-resourced Policy Coherence for Development mechanism to identify and tackle inconsistencies that undermine Ireland’s commitment to Agenda 2030, including, for example, energy, climate change and tax policy issues, as well as global governance, partnership, and policies in the fields of peace, security, defence and trade.
5 The government should carry out a thoroughgoing review of its current international tax policies to ensure they serve to advance rather than impede progress towards the SDGs. This should include a follow-up spillover analysis of Ireland’s corporate tax regime addressing gaps in the previous analysis. The government should also commit to supporting the establishment of an inclusive intergovernmental UN Global Tax Body and provide backing for the EU Parliament position on the introduction of public country-by-country reporting for multinational companies. It should also introduce a publicly held register of beneficial owners of all companies and trusts and support efforts to introduce similar registers across the EU.

6 In addition, Ireland should, through its membership of the institutions of international governance, support developing countries’ fair representation in a transformation of the global tax system that would serve to advance progress in achievement of Agenda 2030. It should also support developing countries to inform and frame the discourse around the issue of Illicit Financial Flows and push for clear leadership of developing countries’ experiences and concerns in delivering an internationally agreed definition of IFFs. Ireland should further advocate for both the SDGs and the Financing for Development (FfD) frameworks to ensure the scope and definition of IFFs include legally ambiguous yet abusive tax practices.

7 Through its membership of institutions of international governance, Ireland should vigorously promote an approach to global trade that takes human rights and sustainable development as its key objectives. It should ensure that trade and investment agreements do not prioritise liberalisation and cost reduction over public interest objectives such as tackling climate change, securing decent jobs, protecting citizens’ health, ensuring tax justice and securing financial stability. Ireland’s international trade policies, and its advocacy in international governance, should cohere with its commitments under Agenda 2030, the Paris Climate Accord, standards and guidelines set by the International Labour Office, and the Convention on Biological Diversity.
Coalition 2030 is an alliance of over 100 civil society organisations working together to ensure Ireland keeps its promise to achieve the Sustainable Development Goals (SDGs), both at home and abroad.

The coalition is made up of both international and domestic NGOs along with youth organisations, environmental groups, academics, and trade unions. Its member organisations work in a broad variety of areas – from humanitarian relief to labour rights and environmental sustainability – in Ireland and in over 50 countries around the world. This diverse partnership has come together in the belief that Agenda 2030 – the global development plan agreed in September 2015 at the United Nations – must be fully implemented and its promises kept.

Together, we collaborate in advocacy for effective implementation of the SDGs and to monitor the Irish government’s compliance with its responsibilities as a signatory to the plan.