

EENGO National Sustainable Development Strategy

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Topic: **Ecological Environmental Non
Government Organizations Network**
Submission to inform the **National
Sustainable Development Strategy**
Draft Approach Overview

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The EENGO secretariat was asked by the Department of the Environment, Heritage and Local Government to provide recommendations for Ireland's National Sustainable Development Strategy, specifically to reflect the input of member organizations. The DoE offered to provide a grant to support a process of consultation amongst the member organizations to provide an environmental NGO perspective on a renewed National Sustainable Development Strategy.

The Editorial Committee comprises five people, who are members of EENGO member organizations: Frank Corcoran of An Taisce, David Healy of Friends of the Irish Environment, Anthony Keane of Gluaiseacht, David Korowicz of Feasta, and Emer O'Siochrú of Feasta. Their role is to guide the development of the recommendations and to ensure that the voices of the EENGO membership are heard. Assisting them is an Editorial Coordinator, Devyn Olson-Sawyer, who coordinates the review process, including the online forum and workshops.

The review process:

During April and May, the Editorial Committee worked with experts in the various topics to develop a first draft document, which was submitted to the Department of the Environment for review and feedback. We have also held two meetings with contributors to discuss drafts and allocation of further input. This process is still at an early stage.

The document that was submitted to the DoE is available for review by member organizations and their individual members through a number of methods. There is an online forum on AirSet.com where each section is posted. This forum requires an invitation to sign up for a free membership. Once signed up, the EENGO member will be able to read and comment on sections via a blog. A pdf version is also available to download on AirSet or can be requested via email to Devyn. Comments can then be emailed back to Devyn.

At least one workshop is scheduled for June in the South West, where participants will be able to discuss the recommendations in a group setting, and share their comments and stories. Other workshops/meetings are being planned in the West and in Dublin. Workshop dates and times depend on the feedback of those interested in attending. For those who may not be able to attend a workshop or comment via blog or email, we also plan one-on-one interviews.

To request access to the blog or for further information about how to get your voice heard, email Devyn at EENGO.NSP@gmail.com.

The approach:

This EENGO submission to inform a National Sustainable Development Strategy will go beyond a reiteration of global objectives under the Rio and Johannesburg summits and European Directives accompanied by a list of Ireland's failures to deliver, although they will set the context of the submission. Instead we interrogate the forces and/or entrenched ideas that stymie progress so effectively and investigate new structures and mechanisms to engage our considerable human ingenuity and drive to secure the future for our children and ourselves.

The next National Sustainable Development Strategy will cover the short - approximately 10 year - window before our options close down alarmingly as climate change reaches irreversible thresholds. There is literally no time to lose and everything to gain, not least national competitive advantage, were we to make the changes now, before they force themselves on us along with the rest of the world.

The EENGO network is comprised of 26 constituent groups, operating at national level, well informed from years of monitoring, commenting and campaigning on these issues. We offer this our considered advice for what should be done, and trust that if it succeeds in sparking a national debate, it will be short and lead immediately to action.

Our overarching aim is not 'Economic Growth' but '**Human Well Being**' that requires a '**Healthy Earth**' and a '**Grown-up Economy**' that can maintain stability.

These are our main organising ideas:

- 1) **Future Risk Management**
- 2) **Recognition of Rights in Commons Property**
- 3) **Communication and Participation Rights**
- 4) **Decentralised and Democratised Energy and Carbon Capture**

They are interlinked and must be taken together for best effect.

Future Risk Management: We tend to treat the future as if it will be a continuation of the present but with more of everything. This is in spite of historical evidence that major changes of direction inevitably disturb well-established trajectories. We even know what those major changes are likely to be – fossil fuel peak, global warming, water and soil degradation, irreversible biodiversity loss, new diseases against which we have few defences and increasing financial global interdependence and instability (in no particular order). The first thing to do is to name the problem – Future Risk – then appoint a department and Minister to manage it along the following lines; -

- The Department will provide the risk assessed decision framework within which, the Taoiseach and other ministers will select options in full knowledge of the range and probabilities of potential outcomes. The national spatial strategy and related development guidelines should be re-evaluated under this framework.
- It will manage the National Investment Funds with a wide input from future thinkers to redress our current over-reliance on market wisdom.
- It will oversee the setting up and operation of the 'Commons Trusts' (see below) and collate information from their various indicators to give us a reliable progress reports.
- It will oversee geographica/spatial information gathering and collation so that all environmental, social and economic data is up-to-date, inter-compatible and freely accessible to government agencies, private sector and especially to civil society.
- It will ensure that the communication technology and channels are reserved for all voices and the arenas for participation welcome the environmental /sustainability sector at all levels of governance. (See below)

Recognition of Rights in Commons Property:

Enabling legislation is urgently needed to protect commons property from being expropriated by public and private agents. The difference between public property and the property of the commons is poorly recognised and this has led to either 'enclosure' for private gain or 'tragedy' from overuse. Governments have proved to be poor trustees of commons resources because of short political horizons and pressure from vested interests. As with the setting of interest rates, far-sighted governments would serve their electorate better by delegating to specialised agencies, Commons

Trusts, to manage commons assets at arms length. Commons trustees would develop appropriate indicators to measure their success in conserving and improving their trust assets. Public and private developers would pay the relevant trusts to comment on impacts of proposed development in their EIS and SIAs. Beneficiary representatives would monitor the indicators and remunerate trustees on the results. The receipts for use of Commons Trust assets can form the basis of a citizen's dividend that would decouple income from production (and consumption) and help address inequality and build social capital. The following are indicative examples of commons needing action; -

- A Sky Trust is urgently required to hold and protect the atmospheric ecosystem property. The Trust would initially administer the Cap and Share emission permit system for transport and expand to cover other sectors as opportunities arise within the EU.
- The value added to land by public and private investment is a commons wealth that is currently captured almost entirely by the landowner. Local authorities should act as trustees for their community and recoup this value through annual levies or land value taxes to be used for infrastructure and services or redistributed as a citizen dividend; failing that, Community Land Trusts should be set up to do so.
- Water is a commons resource not a public good. People who live within a catchment area are beneficiaries of a water commons with a right to an equal sustainable share. Either the local authority acts as trustee to protect and conserve the resource, or a dedicated trust should be given the role.
- Biodiversity is commons that needs urgent protection. Who owns the land or water body that contains the biodiversity is immaterial: the property of biodiversity belongs both to the Irish people and wider humanity and should be managed independently by a dedicated trust. Loss of income from restrictions on farming practice should be compensated through reductions in land value taxes or annual grant aid as appropriate.
- Scientific and cultural knowledge is a commons developed over generations that should not be enclosed or privatised for purely private gain or its value will be diminished for all. The State or trustees acting on behalf of its beneficiaries must guarantee effective broad access to these resources.

Communication and Participation Rights:

New technologies have the potential to transform a public good into a commons. Such a transformation has occurred to the public good of free speech. Free speech is meaningless where some can communicate by high-speed modems and satellite television and others are limited to face-to-face conversation. When communication is compromised, access to knowledge and information is restricted. When access to information is restricted, participation by all sectors on an equivalent basis is impossible.

- Access for civil society to up-to date communication mediums and platforms must be prioritised by the BCC and other responsible agencies.
- Strict non-extendable time limits to restrictive copyright and patents must be enforced to encourage creativity and the knowledge-based economy. Open up access to OS maps and GIS databases.
- Ratify the Aarhus convention and access to environmental information directives. Abolish pay to participate fees for planning and EIS submissions.
- Bring the environmental/sustainability sector into full social partnership. Transfer Comhar to the Dept of the Taoiseach to sit with NESC and NCC. Increase independent representation of environmental NGOs. Resource national NGOs properly without intrusive oversight.
- Reform the CDBs and Local authority structures to conform to Agenda 21 principles – with environmental remit and environmental platform. Resource local NGOs properly without intrusive oversight.
- Education is also essential for effective communication and participation.

Decentralised and Democratised Energy and Carbon Capture:

Ireland's dependence on imported fossil fuels exposes us to completely unacceptable risks of interruption to supply and/or escalating and uncompetitive costs. Energy generation once a public monopoly, is in danger of evolving into a private cartel of a few very large-scale producers to the ultimate disbenefit of consumers and our democracy. Only a vibrant market of many producers (and prosumers) can deliver the flexibility, efficiency, robustness and spread of asset ownership that will ensure our future security. Accurate pricing of energy relative to CO₂ production is vital, as is energy return on energy invested (ROI).

- The distributed grid as well as the transmission grid must be separated from ESB control into a trust even if this means facing blackouts – national interest must prevail over sectoral.
- A guaranteed price for electricity from renewables has promoted innovation and rapid expansion in other counties and it can also deliver for us.
- Carbon credits should be paid for Co₂ sequestration or capture in Ireland, particularly in farming practice. A fund should be established for research and demonstration into biochar production by pyrolysis and its potential as a fertiliser and nutrient management. The Sky Trust should oversee and record carbon capture.
- Capital allowances similar to those for property should be given for renewable energy and carbon capture projects subject to an upper limit cap so that the maximum number of citizens can benefit. Shares should be reserved for the local community and to build a capital lump sum for Irish children on reaching majority.
- Immediate acceleration to second-generation cellulosic technologies for biofuel production is imperative to benefit from our natural biomass advantage. Resources should be prioritised for RTD and demonstration notwithstanding the priorities of the 7th Framework Programme.

Finally, we have added the challenges of Energy and Food Security and Cultural Protection and Diversity to those highlighted in the EU Sustainable Development Strategy.

Questions requested by the DoEHLG to be addressed by our submission - with draft answers following; -

1) What should be the focus of a renewed Sustainable Development Strategy?

The focus should be Human Well Being that requires a Healthy Earth and a Grown-up Economy that can maintain stability.

2) What in their view is the purpose of a National Sustainable Development Strategy?

The NSDS should comprise the overarching reference for other plans such as Social Partnership Agreements, the National Development Plan, the Spatial Strategy and linked Guidelines, all other Department Plans such as for transport and energy, and Regional and Local Government forward planning, control and appeals, as well as informing decisions in the Law Courts. Existing plans should be modified to conform with the renewed Strategy – not the reverse.

3) What does the ENGO sector think that a National Strategy for Sustainable Development should offer to citizens?

It should reassure citizens that the Irish Government has advanced beyond reactive management where 'nothing is a problem until it is a crisis' to realistically and contingently planning for an uncertain future. It should protect their commons assets by recognising them in law and appointing champions to monitor and manage them. It should create the conditions for citizen involvement through free communication, full participation and real shares in existing natural and new energy resources.

- 4) *Should the renewed SDS focus on a review of where we have come to since 1997 and how we've come to that place. Should it be primarily forward looking with only a brief look back for the purpose of setting a context?*

A look back is useful only if it interrogates why so little real progress has been made. A list of misguided agencies (such as the CDBs) and plans honoured in the breach (such as the National Spatial Strategy) that simply notes Government outputs bearing no relation to outcomes would not be acceptable.

- 5) *What would the ENGO sector see as being key elements of a renewed National Sustainable Development Strategy?*

Future Risk Management

Recognition of Rights in Commons Property

Communication and Participation Rights

Decentralised and Democratised Energy and Carbon Capture