

Executive Summary

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

Our overarching aim is not 'Economic Growth' but 'Wellbeing' that requires a 'Grown-up Economy'. We have also added the challenges of Energy and Food Security and Cultural Diversity to the challenges listed by the EU Sustainable Development Strategy outline in order to signal their importance to the sustainability project.

These ideas and the chapter themes of 'Risk Management and Development of Resilience', 'Protection and Sharing of Commons Property' and 'Information, Communication and Participation Rights' are interlinked with the imperative for human civilisation to make a net contribution to Earth systems and bio diversity, especially through 'Democratised Energy and Carbon Capture'. All these ideas must be taken together for best effect and in a market economy, can only be delivered by the price mechanism balanced by the 'Predistribution' to citizens of their real and virtual inheritance.

Risk Management and Resilience Building

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 pass enabling legislation to appoint a dedicated powerful agency, the Risk Management Agency within the Department of Finance to manage it along the following lines; -

- The Risk Management Agency will provide the risk assessed decision framework within which, the Taoiseach, Minister for Finance and other ministers will select options in full knowledge of the range and probabilities of potential outcomes. The NSDS, Partnership Agreements, NDPs and NSS and all 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

that looks to the past not the future.

- It will oversee the setting up and operation of the ‘Commons Trusts’ (see below) and collate information from their various indicators to give us reliable progress reports.
- It will oversee geographical/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, the 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)

Protection and Sharing of 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 could form the basis of a citizen’s dividend that would decouple income from production (and consumption) and help address inequality and build social capital.

There are broadly two kinds of commons needing different approaches –the real commons of natural resources and eco systems, and the virtual commons of knowledge and culture.

Real Commons

- Proposals include reforming semi-state bodies with essential natural resources in their care, such as Bord na Mona and Coillte, as trusts to reflect the new priority for conservation. Their commercial functions would be outsourced into separate agencies that will have to meet the new trust’s standards and charges for use of the resource.
- New trusts are needed too; the first and most important is the Climate Trust to conserve the climate ecosystem and distribute its use value to its beneficiaries. It would administer the ‘Cap and Share’ emission permit system for transport, expanding to cover other sectors within Ireland, then geographically to the EU, then developing nations, leading eventually a global system.
- River Basin Trusts should be entrusted with the water resource within their catchment areas. A Coastline Trust could protect maritime resources and a Biodiversity Trust would redress the power imbalance that has always lost out against economic and social lobbies.

- 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 land value taxes to be then used to redress the infrastructure shortfall and/or distributed as a citizen dividend. In addition, Community Land Trusts should be fostered to ensure housing affordability and social integration in perpetuity.
- Similarly, the human right to access rural land and coasts for recreation and spiritual renewal should be formally recognised and protected by a special trust.

Virtual Commons

- Scientific knowledge and technology is a commons developed over generations of human endeavour that should not be unduly enclosed or privatised for purely private gain or its value will be diminished for all.
- Culture is included in this set of commons. The State or trustees acting on behalf of its beneficiaries must guarantee effective access to these human-created resources.

Information, 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.

- The Århus convention must be ratified immediately and access to environmental information directives enacted. Abolish pay to participate fees for planning and EIS submissions.
- The environmental/sustainability sector should be brought into full social partnership. Transfer Comhar to the Dept of the Taoiseach to sit with NESAC 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.
- Make necessary legal and legislative changes so that EC Directives inform Irish court judges and that the public has access to the courts to appeal poor or ill-informed decisions covering planning, resource protection and biodiversity conservation.
- Access for self-organised 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. Access to OSi maps and GIS databases must be opened up.
- A cadastre of property ownership and interests should be published and

a landvaluescape created on which to base annual land value taxes.

- Education especially in the sciences, is essential for understanding, effective monitoring and participation. Sustainability education for adult decision-makers and professionals should be prioritised.

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 net 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. Communities must be permitted to make long term investment commitments to local energy service providers (ESCOs).
- A guaranteed price for electricity from renewables i.e feed in tariff has promoted innovation and rapid expansion in other counties and it can also deliver for us.
- Carbon credits should be recognised and paid for Co₂ capture in Ireland in farming practice. A fund should be established for research and demonstration of biochar production by pyrolysis and its potential as a fertiliser and nutrient management. Research into other sustainable 2nd generation biofuels should be accelerated.
- Capital allowances similar to those for property should be given for renewable energy and carbon capture projects subject to an annual cap so that the maximum number of citizens can benefit.
- Shares in energy assets should be reserved for the local community and in larger projects, for a capital lump sum for Irish children on reaching majority. The legal structure of the LLPs should be introduced so that revenue can be allocated in a socially equitable and environmentally acceptable way.
- 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.
- Building professionals should be supported in their initiatives to develop an 'open', robust, efficient and low carbon 'conventional' construction system

Predistribution

Equity replaces charity as the guiding principle for distribution of real and virtual commons wealth. It is the necessary corollary of charging for the use or access to resources that were

previously free. Free in a world of limits is a free-for-all where the weak lose and the powerful gain for awhile, but all perish ultimately. We resolutely reject the old solution to the tragedy of the commons, that of enclosure or privatisation, that impoverished the 'commoners' in Europe that led to the flight to the cities. We regret that our government permitted the partial privatisation of the atmosphere by the Emissions Trading System but we accept that few, including most environmental NGOs, truly comprehended the import and impact of that decision at the time. But we are confident that our government has the courage and insight now to redress that mistake by piloting Cap and Share, a mechanism appropriate to our sense of justice and to the challenge of protecting our most vital commons, the atmosphere. There is no other single policy initiative that this government could adopt of higher importance for the world.

Questions Addressed

The following is a brief synopsis in answer to the specific questions requested by the DoEHLG to be addressed by our submission,

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

The focus should be Human Wellbeing that requires a Grown-up Economy that can maintain stability even in the face of the economic decline that is likely with constraints to fossil fuels.

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?

Risk Management and Resilience Building

Focus on Wellbeing and a Grown-up economy

Recognition of Rights in Commons Property including Predistribution

Information, Communication and Participation Rights

Decentralised and Democratised Energy and Carbon Capture

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. But it has been a new experience for many NGO activists to step back from urgent reactive actions, to consider optimal long term measures from the perspective of the policy maker. This adjustment took some time to carry out, hence this submission is completed rather later than we planned. As many of our member NGOs have expertise in only a very particular area, not all actively support all of the ideas contained in the submission, particularly as they relate to social and economic issues. However, they are not, either, against any of them as they respect the expertise of NGOs with a wider field of interest to contribute their recommendations as part of an overarching strategy. Total consensus in every area of policy is not achievable even for the legendary united Fianna Fail, so it not reasonable in this case, nor is this submission diminished by the fact that it does not make such claims.

We wish to thank the DoEHLG for its financial assistance in preparing the submission.

Finally we trust that if our submission succeeds, as we hope, in sparking a national debate about Ireland's sustainability strategy, the debate will be short and lead immediately to action.

