

# Response to the Draft Sustainable Development Strategy for Northern Ireland

Issued 15<sup>th</sup> September 2009 by OFMDFM Sustainable Development Unit

15th January 2009

# The Chartered Institute of Environmental Health

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## 1.0 Summary

- 1.1 Sustainable development, as a philosophy and concept should be, we believe, the key overarching objective of any government. In the context of Northern Ireland it should be, we believe the strategy from which the Programme for Government flows. It recognises and integrates three fundamental pillars of society by recognising the links and interdependencies between environmental, social and economic concerns.
- 1.2 We therefore welcome this draft Sustainable Development Strategy (SDS) and the opportunity to comment upon it. However we feel we must express our concern about the gulf that now exists between Northern Ireland (NI) and the rest of the United Kingdom in terms of leadership on sustainable development. We are, once again, at a draft strategy stage having jettisoned the previous strategy for NI only launched in May 2006, whilst by comparison England had its first SD strategy in 1999.
- 1.3 As a member of Northern Ireland Environment Link (NIEL), we have contributed to the submission that they have provided and would wholly support and endorse the content of that document. It is not therefore our intent to re emphasise the detail of those comments in this document but rather to simply summarise some of the fundamental issues within this draft strategy.
- 1.4 As the title of the document suggests, and we would wholeheartedly agree, everyone needs to be involved. Sustainable development requires the input of virtually every government department not to mention the absolutely critical role that local government, NGOs, the community and voluntary sector and the business sector have to play if it is to become truly and substantively mainstreamed and realise the potential that the concept offers for a safer, healthier, more equitable and more secure future for all in society. It is disappointing therefore to note the lack of engagement thus far in the development of this draft strategy.
- 1.5 That being said, we trust that, given the previous point that the views of stakeholders will be taken on board during this consultation. Despite our misgivings and concerns about the detail in the current draft strategy we believe that it is vital that the revisions we would suggest it requires does not impact on and delay the commencement of considerations regarding implementation.
- 1.6 We do also fully acknowledge that the document suggests that the development of the forthcoming implementation plan will involve a wider engagement. We welcome that – indeed would suggest that it is absolutely vital if the strategy and plan is to have any real chance of achieving results. Ownership by all stakeholders is vital for success.
- 1.7 It is vital in our view that this strategy provides a strong foundation for action and in its current form it does not do so for at least 2 key reasons. Firstly it is not balanced and leans far too much towards economic development rather than balancing the 3 pillars of SD and secondly the language used within it, particularly in terms of the stated commitments is language in itself that fails to communicate real commitment.

## 2.0 Suggestions for improvement

- 2.1 Whilst we accept that this is a strategy for NI, nonetheless it is very important in our view that the principles and priorities are closely aligned with the rest of the United Kingdom. The priority areas differ significantly from those adopted by the UK, Scotland and Wales, and indeed from those at EU level. In particular the priority area of sustainable consumption and production has been left out. This is not acceptable in our view and must be reinstated.
- 2.2 The strategy needs to be better balanced between economy, society and environment. Given that all credible evidence currently suggests that environmental concerns, specifically global warming as a result primarily of unsustainable development, now potentially threaten future human life on the planet, it is unacceptable that the strategy contains little reference to this and specifically makes no commitment to measurable, quantifiable reductions in overall greenhouse gas emissions for NI. This needs to be addressed.
- 2.3 The strategy should contain other high level, measurable, quantified targets. Whilst we totally accept that further targets are appropriate for an implementation plan and would hope to contribute towards the development of the same, nonetheless this strategy requires some broad targets if it is to be taken seriously by other departments. We would suggest that these targets could include for example improvements in resource efficiency; reducing gap in life expectancy; reducing proportion of households living in poverty; Increasing economic prosperity; etc.
- 2.4 These targets should, where at all possible be aligned with and linked to the relevant high level targets in daughter strategies where they exist. For example, Investing for Health (and its successor); Neighbourhood Renewal; Regional development etc. By doing so would greatly assist in building the complementarity and synergy between the SDS as an overarching strategy and other key strategies that are linked to it. That would in turn assist with building ownership and commitment to delivery.
- 2.5 The language currently used within the document, particularly relating to the objectives, is too weak and sometimes ambiguous. The use of phrases such as "explore the means by which" or "continue to further develop" lack sufficient commitment. The commitments and objectives need to be strengthened through the use of much more definitive (and accountable) statements. We believe this, whilst perhaps seeming quite a minor, easily achievable change, would give a much stronger sense of ownership and priority by government and assist with subsequent buy in from the huge array of stakeholders that will be needed to deliver.
- 2.6 Mechanisms for monitoring and reporting on progress against objectives and targets must be developed. The existing Statutory Duty for sustainable development has potential to be a real driver for action. But in the absence of any monitoring and reporting mechanisms (as is the case at present) it is effectively impotent. This must be addressed and should be committed to within the strategy.
- 2.7 Whilst the strategy implies through its title (and also details more specifically in chapter 3) that everyone needs to be involved, it is in essence very focused on central government. While central government clearly has a significant role to play, it is absolutely vital to recognise that it cannot by itself deliver. This fact, coupled to the lack of wider engagement in the development of the strategy to date and the weaknesses of the current priorities and commitments referred to above leaves a real

question mark in our view as to what level of contribution, commitment and direction the strategy will, in its current form, stimulate from others. Apart from the amendments suggested above, it is absolutely vital that there is full, inclusive, comprehensive, cross-sectoral engagement with stakeholders in the development of the forthcoming implementation plans. There are valuable lessons to be learned from previous policy development processes, also demanding this kind of level of engagement, that have done so very successfully, and in particular we would commend the previous processes and approach used in the development of the Investing for Health Strategy.

- 2.8 Serious consideration needs to be given to assigning clear ministerial responsibility and accountability for sustainable development. This strategy should be the framework for all other government policies and plans (including the programme for government). As such that responsibility should be overt, cogent and vested at the very highest level i.e. First or Deputy First Minister.