

Promoting Sustainable Living: A response from Friends of the Earth



Promoting Sustainable Living is a welcome starting point for the implementation of Sustainable Development in Northern Ireland. It must be noted, however, that this level of discussion was reached some years ago in other parts of the United Kingdom. We have a great deal of catching up to do – the Scottish Executive published *Meeting the Needs...priorities, actions and targets for Sustainable Development in Scotland* in April this year. Friends of the Earth hopes that the comments below will help accelerate the pace.

We note that in contrast to equivalent UK consultations (on *Opportunities for Change*, for example) this paper comes from a single government department rather than the Executive. If sustainable development is to become a reality, leadership from the centre will be essential.

It has to be said that the paper is something of a blank canvas – an invitation to write a book on the subject. This is disappointing given that so much work has been done by governments, NGOs and think-tanks on this subject. We have resisted the temptation to reply with a book-length response and would instead refer the Department to two publications which we are pleased to be able to make available:

- Tomorrow's World, McLaren, Bullock, Yousuf, (Earthscan, 1998)
- More from less, (Friends of the Earth, 2001)

We would also emphasise the importance of ensuring that the strategy is in line with and incorporates current EU policy and anticipates future EU policy.

Do you find the Brundtland definition helpful?

Although there is broad consensus around the Brundtland definition of sustainable development, that definition is too vague for practical use in policy-making. The translation of that definition into clear **objectives and targets** (see below) which can be used in practice is a necessary, and challenging step.

Do you agree that the objectives from the UK Strategy are appropriate for Northern Ireland? Do you think our objectives could be framed in a more relevant way?

There is widespread agreement on the overall goal of sustainable development, and on its broad definition, but this masks intense debate and controversy as to the more practical implementation of the principle. Thus it is important that the Executive sets out its objectives clearly and transparently. These objectives should address the failings of the existing model of development - pressure on environmental limits, increasing inequity, and declining quality of life for many. Moreover it is implicit in the concept of sustainable development that these objectives are fully integrated and mutually compatible. If the objectives are such that the result is the trading-off of one against the other, then a sub-optimal outcome will be the result. In this light, the objectives proposed in *Promoting Sustainable Living* are welcome, but still

inadequate. They should be clarified, and the economic objective needs revision. At present this objective still reflects the conventional view that economic growth provides financial wealth which can then be used to help tackle inequality and environmental degradation, rather than the sustainable development view that increased equality and inclusion in society, and better environmental protection will increase peoples' quality of life directly, and incidentally may generate increased economic wealth. This is not just a semantic distinction, as the conventional view effectively authorises the pursuit of economic growth as an overriding objective, regardless of its potential negative impacts on quality of life, equity and the environment. In practice such an authorisation is disastrous, because there are still many other incentives for the pursuit of economic growth through the conventional development model, regardless of its likely impacts. We recommend the following objectives be adopted:

- Inclusive social progress, which increases equity, recognises needs, provides opportunities and improves health for all, both within the UK and elsewhere on the planet;
- Effective protection, restoration and enhancement of the global and local environmental quality and biodiversity, on which we all depend, alongside prudent and efficient use of natural resources within environmental limits;
- Sustaining and improving human well-being through the development and maintenance of a high-quality, competitive and environmentally efficient economy which provides high and stable levels of employment allowing people to lead full and productive lives.

Such fundamental objectives should then be reflected in clear and measurable targets which can be used to guide the formulation of policies across government. It is possible to establish simple targets for sustainability through the application of the 'Environmental Space' methodology. Such targets reflect both environmental limits and equity, the key needs to reduce the rate humankind extracts resources from, or dumps wastes into, the environment; and to distribute access to those resources fairly between people and nations. At present, with just 1% of the planet's population, the UK currently takes 5% of the sustainable global capacity for carbon dioxide absorption; over 2% of the planet's sustainable timber yield, and 5% of the sustainable production of aluminium. The Environmental Space approach builds on the work and advice of the IPCC on climate targets to help policy makers set comprehensive sustainability targets using a framework of a range of key resources. The methodology and reasons for setting such targets are explained at length in our recent book 'Tomorrow's World'. Table 1 sets out our calculations of what targets apply in the UK. We have not produced separate figures for Northern Ireland. Many will apply pro rata but others will differ significantly such as construction aggregates which we consume at three times the Great Britain rate.

The targets for 2010 are based on a rule-of-thumb of achieving one quarter of the necessary reduction by then, although in several cases – CO₂, wood and water there are strong reasons for making more rapid progress. We are confident that these targets indicate the right direction, scale and speed of change necessary to achieve sustainable development in the UK. Whether such targets are set as firm policy or used to illustrate and guide policy, they demonstrate the scale of the sustainability crisis we face and the urgency of an effective response. However, there are many and sufficient policies and practices which can contribute to progress towards these targets whilst increasing quality of life for all. We have also estimated the extent to which the sustainability gap can be closed with existing and easily foreseeable technical and lifestyle measures of this type (see *Tomorrow's World*, Chapters 5-9).

Table 1: Environmental space targets for the UK			
Resource	Environmental Space (per person per year)	Reduction required (per cent) - by 2050	2010 target - (per cent reduction)
Aluminium	1 kg	88	22
Carbon dioxide (emissions)	1.1 tonnes	88	30
Cement	59 kg	72	18
Chlorine	0 kg	100	25
Construction aggregates	2.3 tonnes	50	12.5
Land (UK average quality)	0.26 hectares	27	7
Steel	26 kg	83	21
Water	187 Ml	15	15
Wood (Wood Raw Material Equivalent)	0.24 m ³	73	65

We consider that it is inadequate to consider developing sustainability indicators without targets. Some indicators can be useful without associated targets, by indicating whether change is in the right direction. These directional indicators can partially help overcome the inertia amongst policy makers and the public to recognise the scale and urgency of the challenge of sustainable development, but only ‘distance-to target’ indicators can convey whether change is of the right rate or magnitude. Such indicators and associated targets are urgently needed. The strategy should set targets in place, along with appropriate indicators and mechanisms to monitor progress and to ensure effective reviews of policies and practices where progress is inadequate. Monitoring of progress against such targets is likely to require new data gathering (see answer to question on indicators on page 8, below). This should not be treated as a reason to reject particular types of indicator or target.

Are these the right principles for Northern Ireland? Are there other principles which you think should be included?

One of the principles: ‘*Creating an open and supportive economic system*’ sounds uncontroversial until the explanatory note is taken into account: ‘*Sustainable development*’, it reads ‘*requires a global economic system which supports economic growth in all countries. We need to create the conditions in which trade can flourish and competitiveness can act as a stimulus for growth and greater resource efficiency.*’

Phrased in this way, this principle ignores the goal of improving quality of life; the importance of fair trade; and the critical role which local economies have to play in sustainable development, economies which are being undermined by the current emphasis on global free trade as exemplified by the agenda of the World Trade Organisation. A more balanced and effective explanation of this principle would be:

- *Creating an open and supportive economic system*: Sustainable development requires a global economic system which supports and helps deliver increased quality of life for all. We need to create the conditions in which fair trade can flourish, strong dynamic local economies can develop and markets properly reflect environmental and social costs as a stimulus for quality growth and greater resource efficiency.

We recommend the replacement of the existing explanation with this one.

Do you think the approach to sustainable development described here is the right way to go about delivering our vision of the future?

The pursuit of sustainable development requires a synergy, rather than a balance, between the economic, the social and the environmental. Analysis of the issues should aim to prioritise spending which can address all three of these simultaneously. The policy framework for financial allocations should lead to the prioritisation of *...policies which meet objectives across more than one Department or PFG Priority, [and which are] in conformity with sustainable development principles....*

Achieving sustainable development promises a decent quality of life for all, both now and in the future. For this to happen requires a fundamental paradigm shift. The integration of social, economic and environmental objectives so that each is mutually supportive is what will deliver successful economies, social justice and a stable environment. No one of these is possible without the other two. Jonathan Porritt, chair of the UK Sustainable Development Commission inspired his Belfast audience on this subject earlier this year. He made the fundamental point that sustainable development is not a theme within government but a framework *for* government.

Achieving a socially just, economically vibrant and environmentally responsible society is not a matter of proofing policies for their sustainability content (adding to equality, rural, health etc). Nor can we pursue health objectives in isolation from air quality objectives. We cannot target social need without controlling pollution which usually affects the poorest and most vulnerable the greatest. We cannot measure our economic success by GDP growth alone if there are no new jobs to go with it.

Rather we need to find a way of prioritising policies which will deliver sustainable development, policies which bring about gains simultaneously for the economy, the environment and society. Examples of such **win-win-win policies** are legion. A comprehensive programme of home insulation would eliminate fuel poverty, create hundreds of jobs and reduce greenhouse gas emissions. Investment in public transport would reduce road accidents; provide access for those without cars; circulate expenditure more effectively in the local economy; and improve air quality and therefore health. Supporting the production of food for local consumption could be the basis of a revitalised rural economy creating new jobs in horticulture and strengthening local retailers.

On a global scale, the OECD estimate that there is a world market for environmental technologies of £200 billion annually and growing at 5% a year. But in order to take advantage of such a market a little domestic stimulation in the form of environmental regulation is critical. Northern Ireland's *laissez faire* attitude to pollution leaves us ill equipped to participate in this huge opportunity. The integration of industrial policy and environmental policy at this point could produce mutual benefits.

For this paradigm shift to occur will require fundamental changes, the most important of which will be for sustainable development to become a framework for government rather than a theme within it, of which more below. The approach outlined in *Promoting Sustainable Living* is in danger of failing to achieve the necessary shift. The challenge is not so much how to *reflect sustainable development objectives in departmental, agency and other public sector business plans, priorities and resource allocations* but how to **align departments plans and resources behind agreed sustainable development goals which provide the over-arching direction for the Programme for Government.**

Do you agree that policies and programmes should be subject to more integrated appraisal? If so, how do you think this should be done? Are you aware of any approaches used elsewhere that could be usefully applied?

It is important to establish the difference between ‘proofing’ and ‘appraisal’. The former is designed to check a policy for specific impacts. It can be characterised as a test, or less charitably, an exercise in ticking boxes. Appraisal is more of an iterative process designed to improve the quality of a policy. It is not really an *assessment of the impact of policies* but a means of designing the best policy to achieve agreed goals.

This is a complex area but fortunately one in which expertise is available. Forum for the Future has done some valuable work on sustainability appraisal and could provide valuable assistance in helping Northern Ireland to address this issue.

A properly appraised sustainable development policy could potentially meet objectives in all the areas which are currently proofed and appraised - equality, social need, economy, health, environment etc. One might argue that sustainable development appraisal *is* the integrated appraisal method which OFMDFM seeks.

Do you agree that there is scope for business plans of Departments, agencies, etc, to reflect more fully sustainable development principles? Are you aware of any examples of business plans that do so?

Clearly there is enormous scope. An interesting example is the UK Department of Trade and Industry’s Sustainable Development Strategy (DTI, Oct 2000). The strategy has placed resource efficiency on a par with competitiveness and has been influential in informing the Department’s strategic direction and priorities.

Do you have any suggestions for how to ensure that policies which meet objectives across more than one Department or PfG priority receive commensurate priority in resource allocation?

For this essential task to be achieved the Executive should commit to establishing sustainable development as the *framework for* government rather than a theme within government. From such a commitment, actively pursued, would flow social, economic and environmental benefits for all. Departmental budgets must depend on delivering on cross-departmental goals, goals previously agreed by the Executive as delivering a sustainable Northern Ireland.

A first step would be to bring the issue of Sustainable Development into OFMDFM. Currently it resides with the Department of the Environment even though it is the Departments of Enterprise, Trade and Investment; Social Development; Regional Development; Agriculture and Rural Development; and Health who can actually deliver.

It has been argued elsewhere that effective government depends on departments being ‘brigaded’ in pursuit of policy goals and resourced accordingly. There is, of course, deep institutional resistance to such ways of working but this is surely a *sine qua non* of the required paradigm shift. **The question is not how departmental policies contribute to sustainable development but how agreed sustainable development policies can be implemented via the departmental apparatus.**

Do you think these policies are helping or will help to deliver the integrated objectives of sustainable development? If you do not think so, what are your reasons? Where do the weaknesses lie?

Time does not permit an analysis of all these policies but some deserve comment.

- The Regional Development Strategy has much potential but the test will be in its interpretation and implementation.
- Investing for Health broke new ground in this field but it is not so clear whether other Departments are fully on board in delivering on its aims.
- DETI's account of its activities (save the reference to 'Growing the Green Economy') is very much business as usual.
- Human rights is an important area but there has been little response to calls for environmental rights to be afforded to citizens, as is the case in many other jurisdictions.
- In agriculture, the Vision Group Report, focuses almost entirely on competing in the global economy and shows little understanding of the many opportunities to be found in growing the local food economy.
- The Regional Transportation Strategy fails to establish a 'sustainable transportation framework' as claimed, directing, as it does, two thirds of resources to roads and only one third to public transport – a uniquely unsustainable approach within the UK and most of Europe.
- Waste management plans remain unimplemented 2½ years after the NI Waste Management Strategy was published.

While the concept of sustainable development has clearly informed some of these policies, the valiant attempt to portray them as *a substantial platform of existing and developing strategic policies which reflect Sustainable Development principles and take an integrated approach to tackling issues* is not credible. Indeed this exercise demonstrates the danger of appraising Departmental policies for their sustainable development content rather than asking how departments can contribute to agreed sustainable development goals. We should not pretend that we are already on a sustainable path – to do so undermines our chances of finding the path, much less make any progress along it.

What other policy initiatives should the Executive be taking to promote sustainable development?

Programme for Government: The Executive should commit to establishing sustainable development as the *framework* for Government with agreed cross-departmental goals. From such a commitment, actively pursued, would flow social, economic and environmental benefits for all.

Departmental initiatives: At Departmental level, the scope for such initiatives is enormous. Examples include: assisting indigenous companies to compete in the world market for environmental goods and services; a comprehensive programme of home insulation; transport policies which deliver, over time, a reduction in costs to the health service through a decrease in road accidents and improved air quality; planning and industrial policies which encourage the co-location of businesses which use each other's waste products as resources; and local food procurement policies for hospitals and schools which support local agriculture.

Environmental regulation – driver for sustainable development: There is one particular area of spending, however, without which the pursuit of sustainable development will be an essentially futile exercise unless it is given considerable priority. One of the key drivers for

sustainable development is a comprehensive and fully functioning system of environmental regulation. Without such a system there is little incentive for business, individuals, or the public sector to act in a sustainable manner. There is ample evidence from countries such as Germany that strong environmental regulation has been economically beneficial. We also know that lack of environmental regulation visits pollution primarily on the socially disadvantaged – those who live down hill, down wind and down stream of pollution sources.

Northern Ireland's backlog of transposition of EU environmental directives is well known. The Executive should give a very high priority to ensuring that the DOE is adequately resourced not just to clear the backlog but also to stay ahead of the increasing volume of environmental legislation emanating from Europe. This means securing properly experienced and qualified staff in sufficient numbers.

Need for an independent Environmental Protection Agency: Environmental legislation, however, is of little value unless it is enforced. Northern Ireland's record of enforcement is not a proud one. The culture is one of minimal compliance rather than the beacon of best practice which we should aim to be. In the short term progress can be made by identifying and implementing reform within the Environment and Heritage Service and allocating significant new resources. In the medium term effective regulation can only be achieved by introducing a fundamental reform to bring Northern Ireland into line with all its neighbouring jurisdictions – the establishment of an independent and properly resourced Environmental Protection Agency.

Public procurement in support of Departmental policies: It should be remembered that public procurement can be a valuable tool in securing the success of a number of Departmental policies. For example the purchase of recycled paper by all Departments would create a significant market and may give business the confidence to invest in much needed paper recycling plant in Northern Ireland. A commitment to purchase renewable energy across the entire public sector would greatly assist the development of the renewable energy industry and bring prices of renewables down. The purchase of local food by schools and hospitals would provide much needed markets for local agriculture and give farmers the confidence to diversify into horticulture, for example. Roads Service could assist the legitimate aggregates industry by ensuring that its contractors supply only legitimately extracted and taxed aggregates.

Do you have any other ideas on how strategic policies can be developed in a way that supports the achievement of sustainable development?

Please see *Tomorrow's World* and *More from less* (pp39-42).

How relevant do you think the above list of 'headline indicators is to us? If you think that others are needed, what subjects, in general terms, do you think they should cover?

It is widely accepted that GDP is not a measure of social progress, or of economic welfare. Yet it remains the *de facto* headline indicator for progress in the Northern Ireland. We accept that there are perceived and actual difficulties with alternative measures which do attempt to measure sustainable economic welfare. We understand that at present the view is that alternative aggregated indicators (such as the Index of Sustainable Economic Welfare) are not far enough developed. However, we feel that this is not a reason to ignore these alternatives. These problems can be solved, and what is required now is for Government to put some effort into helping to develop better versions of these indicators. Alternative aggregated measures of welfare need to be taken from academic circles and debated more widely - this is how they can be improved. We do not feel that the alternatives to doing this are adequate. Currently it appears that it is felt within Government that if GDP is presented alongside a sufficiently

broad range of environmental and social indicators as a package of sustainability indicators, then the faults of GDP will not matter - for if progress is made towards the other indicators then there is little problem. This is not a view we share. Even if all of these indicators had equal weight, then the continued use of GDP would mean that Government policies would still be trying to make progress towards conflicting goals. It is critical that an economic indicator is developed, to be displayed instead of, or alongside GDP, which measures “quality” economic activity that meets needs and increases welfare and quality of life - the main aims of economic policy.

Also we feel that the choice of sustainable development indicators should not be dependent on the existing availability of data - some critical indicators will require additional data collection, for example, for pollution inventories, calculating ecological footprints, and measuring access to services.

We recommend the use of the ‘mass balance’ methodology for the collection of data which can then be used to calculate several measurements of resource use.

The national accounts describe the flows of money through a national economy. Associated with the great majority of such flows, and all money flows related to the flow of goods and services there is a flow of materials. Knowledge on the size and nature of these flows are fundamental to an understanding of the resource requirements of the economy, and the impacts of resource use on the environment. Moving towards sustainable development will require a management of materials and resources that is informed by a knowledge and understanding of resource flows that is as detailed and comprehensive as that deriving from the national accounts in respect of money flows.

The mass balance concept is based on the fundamental physical principle that matter can neither be created or destroyed. Therefore the mass of inputs to a process, industry or region equals the mass of outputs as products, emissions and wastes, plus any change in stocks. When applied in a systematic manner this simple and straightforward concept of balancing resource use with outputs can provide a robust methodology for analysing resource flows.

The basis of the mass balance framework is a set of conventions for classifying materials, products, geographical regions and industries. A lack of consistent classification of data has frequently been a major barrier to the amalgamation of datasets and therefore a series of widely applied classification schemes have been suggested as a standard for mass balance data. The classification schemes and methodologies are outlined in Linstead and Ekins¹. The data collected using mass balance methodology can be used to summarise the resource flows of industries, geographical regions, materials and products and how these resource flows change over time. The mass balance framework also integrates with other resource flow methodologies such as environmental space, ecological footprinting and total materials requirement (TMR). Resource flow analyses of this type are key to understanding the flows of materials through the economy and to identify where the necessary resource efficiencies can be made to work towards the Factor 4 or Factor 10 improvement required for sustainability. This information is also crucial to the development of indicators to monitor the resource efficiency of Northern Ireland and to inform policy making designed to move to a more sustainable society.

¹ Linstead, C. & Ekins, P. (2001) Mass Balance UK. Mapping UK resource and material flows. Royal Society for Nature Conservation.

How should we report on whether we are progressing to a more sustainable way of living?

We would welcome regular reporting by all departments on progress towards the objectives and targets described above. Such reports could be reviewed by a new Assembly Committee performing a role similar to that of the House of Commons Environmental Audit Committee. The Assembly may consider establishing a Sustainable Development Committee. To ensure full and thorough accountability to the Assembly, there should also be annual reporting to it by the First and Deputy First Ministers on overall progress towards the Executive's sustainable development objectives and targets. *If* sustainable development becomes the framework for government and if the Programme for Government becomes a sustainable development strategy, there will be no need for separate reporting.

How best might we deliver on effective high level coordination?

Given that sustainable development is an over-arching commitment of Government and that it can only be achieved through close cross-departmental working, this issue would seem an appropriate one around which an Executive sub-committee could be formed. In theory, due to the nature of the subject, all Ministers should participate but the core could usefully comprise: social development; health; enterprise, trade & investment; environment; regional development; and agriculture & rural development. In such a forum Ministers could consider policies brought to the table by colleagues which meet objectives across more than one Department or Executive priority area and which conform to sustainable development principles. Such policies and actions could be approved for (i) privileged status for bids within the annual budget round; (ii) joint or Executive recommended funding bids outside the formal annual spending allocations; and (iii) bids to the Executive Programme funds. This could go some way to addressing the dearth of joint bids submitted to the Finance Minister by the spending Departments.

In Scotland the First Minister chairs a cabinet sub-committee which comprises key ministers and three members from outside government (including the Chief Executive of Friends of the Earth Scotland). An "inter-departmental group chaired by the Environment Minister or a senior DOE official" would not be an adequate means of maintaining a focus on sustainable development across government. It is essential that political and administrative leadership comes from the centre.

What is the role for other sectors – the business and farming communities, the private and voluntary sectors – in delivering sustainable development.

For business sector see *More from less* (pp31-37 and 42-45)

Do you agree with the idea of a "Forum" for sustainable development?

The term "Forum" is probably not the most appropriate – suggesting a large group of people talking. The parallel with the UK Sustainable Development Commission, however, is a valuable one. What is needed is a body with 'clout' rather than a marketplace for information although one of its roles may be to facilitate the exchange of information.

We recommend that a small cross-sectoral working group is asked to engage with the UK Commission to draw up a proposal for a Northern Ireland Commission including secretariat and research budget.

If so, what do you think its objectives should be and who do you think should be on it?

Similar objectives to the UK Commission would be appropriate. The Commission's role is to advocate sustainable development across all sectors in the UK, review progress towards it, and build consensus on the actions needed if further progress is to be achieved. Specific objectives include to: review how far sustainable development is being achieved in the UK and to identify processes or policies undermining this; identify important unsustainable trends which will not be reversed on the basis of current or planned action, and recommend action to reverse the trends; deepen understanding of the concept of sustainable development, increase awareness of the issues it raises, and build agreement on them; and encourage and stimulate good practice.

The membership should be cross sectoral of, say, 10-12 people with appropriate experience, chaired by a person with a track record in sustainable development. It is significant that Tony Blair chose Britain's best known environmental campaigner, Jonathan Porritt, as the chair of the UK Commission.

Should it be independent of the Executive and the Assembly?

The UK Commission reports to the Prime Minister and the heads of the devolved administrations - in our case the First and Deputy First Minister. The NI Commission should be appointed by the First and Deputy First Minister and should report to them.

If so, how should it relate to them and to government departments, agencies, other sectors etc?

The precise form of these relationships would need some discussion but the key would be that they were constructive, open and cooperative. We would envisage that government departments would view the Commission as having a legitimate interest in their affairs and would be able to assist them in contributing to the Executive's sustainable development goals.

The NI Commission should actively pursue cross-border co-operation with a view to contributing to a coherent all-island approach to sustainable development.

Finally, as a cautionary note, we would add that sustainable development will make no real progress in Northern Ireland unless the basic building blocks are in place. An essential driver of sustainable development is an effective environmental protection regime. As long as we lack key environmental legislation and as long as we fail to enforce it, sustainable development will remain a distant dream. Put bluntly, as long as it is cheaper and easier to pollute than not pollute, businesses, public bodies and individuals will lack a crucial incentive to adopt sustainable practices.

Friends of the Earth (Northern Ireland)

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