



Environmental Pillar Submission on the Draft EPA Strategic Plan 2013-2015

November 2012

The Environmental Pillar welcomes the opportunity to comment on the Draft EPA Strategic Plan 2013-2015.

Recognising that this is an outline plan, and that the devil may well be in the detail of implementation, the members of the Environmental Pillar make the recommendations below in the context of the Pillar's fundamental position that:

The continuing success of human society and social systems depends fundamentally on the preservation of the overall productivity, health, and long term sustainability of the ecosystems and environmental services that underpin and supply many of the most basic components of human welfare such as healthy soils, clean water, and clean air.

There is a great deal in the EPA Draft Strategic Plan that reflects this understanding and the Pillar welcomes this. However in order to promote this in full, the Plan needs to be strengthened and broadened in the ways outlined below. The commentary below follows the structure of the Draft Plan.

Draft EPA Strategic Plan 2013-2015

Our Mission:

Existing Text: *To protect and improve the environment as a valuable asset for the people of Ireland.*

Recommended Text: *To protect, restore and improve the environment in its own right and as a fundamental resource for human wellbeing.*

Reasoning:

- It is important for the Mission to reflect the need to reinstate and repair, as far as is possible the historical damage done through the years of neglect.
- It is important to recognise, as it is elsewhere in the Strategy, that the environment existed before the evolution of mankind, and that we are in the



midst of the 6th mass extinction. This 6th mass extinction has been triggered by human activity and appears to be accelerating for the same reasons. This is a global issue, and whilst the EPA's role is focussed in Ireland, many of its activities have consequences for the global biosphere.

Our Values:

The Pillar welcomes the expressed values but would add the following:

- We encourage and enable the public to embrace their rights of access to information, of participation in decision-making and of access to justice in environmental matters.

Reasoning:

- In order to fulfil the Mission, as expressed, it is necessary to encourage public participation in decision-making processes that impact on the environment. To this end the EPA should seek to develop best practice tools and mechanisms that will enable effective and meaningful public participation. These will serve the EPA's own processes and provide blueprints for the public engagement that is essential for the development of a sustainable future for Ireland. The ratification of the Aarhus Convention is an added driver here.

Introduction from Director General

There is one statement in the introduction which is repeated and reflected elsewhere in the document, and which the Pillar members recommend should be amended, viz.

Existing Text:

In this new Strategy we believe that a clean, healthy and well protected environment lies at the heart of economic recovery. Our over-riding priority for the next three years is to keep the environment centre-stage and support sustainable economic recovery.

Recommended text:

In this new Strategy we believe that a clean, healthy and well protected environment lies at the heart of social and economic wellbeing. Our over-riding priority for the next three years is to keep the environment centre-stage and support the sustainable development of social and economic wellbeing.

Reasoning:

- The current drive for growth in the economy goes counter to the expressed Mission. It is clear that continued growth in GDP cannot be sustained given



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the many limits to growth, and because of the dire consequences for humanity and the rest of the biosphere of continuing down that road. *Economic recovery* cannot by definition be sustainable if it means going down a different but parallel road to the one we have just abandoned.

- What is not measured does not get done. Ireland must establish a new tool for measuring the success of our society which unlike GDP, does not include for example: the numbers of people in prison, illness, premature death, pollution and treatment of same, as amongst its drivers. This new yardstick should include all the metrics that contribute to social and human wellbeing,
- To *support the sustainable development of social and economic wellbeing* clarifies what we believe the EPA mean by economic recovery and is a better fit with the six broad environmental goals in the EPA's *2020 Vision*

Challenges & Opportunities

Existing text:

Environmental Protection

Recommended text:

Environmental Protection, Restoration and Improvement

Reasoning:

This is needed to be consistent with the revised Mission statement.

Also for consistency two new bullet points are needed:

- Ensuring that damage done to the environment is repaired and that the polluter pays
- Working with other interested persons to enhance the quality of the natural environment

Existing Text:

Economic Recovery:

Recommended text

Sustainable development of social and economic wellbeing:

Reasoning:

This is needed to be consistent with the revised Introduction.



Society:

Existing text:

- *Mobilising all citizens to engage in a more environmentally responsible way in areas such as energy consumption, water usage and waste reduction.*

Recommended text:

- *Mobilising society -including all citizens, public bodies, financial institutions and the social partners - to engage in a more environmentally responsible way in areas such as: development of industrial and economic policies, transport planning, energy consumption, water usage and waste reduction.*

Reasoning:

Whilst it is probably not intended, as written the text appears to apply only to the private citizen, when clearly responsibility for the environment lies with all public and private persons, including the EPA. The existing conflict of drivers within the EPA, between enabling GDP growth on the one hand and protecting the environment on the other, is a case in point. Unless the EPA can be freed from the former and re-directed to the *sustainable development of social and economic wellbeing*, then it cannot hope to be effective in doing the latter.

Strategic Outcomes

Existing text:

A clean, productive and well protected environment supporting a sustainable society and economy

Recommended text:

A clean, productive and well protected environment supporting a sustainable society and economy within quantifiable parameters such as the Planetary Boundaries:

<http://www.stockholmresilience.org/planetary-boundaries>

Reasoning:

The strategy needs a context that is based on good science and a broad understanding which identifies and quantifies planetary boundaries that must not be transgressed.

Environmental Goals

Existing text:

Limiting and Adapting to Climate Change

Recommended text:



Working to Prevent Climate Change, and to Reduce its Impacts

Reasoning:

Whilst the existing text is an agreed goal in the EPA's 2020 vision, it is clearly nowhere near ambitious enough, particularly in the light of the recent report by PWC¹, and the UNFCCC's ultimate objective is "stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system."

Priorities/Intermediate Outcomes

Knowledge:

Accessible Information: Provide timely and easily available environmental information to all our stakeholders.

New EPA website with more user friendly, timely and local environmental information available and accessed on line

Comment:

Whilst the EPA has made great strides in making information and meta-data available, there remains a real issue with availability of documents regarding licensing. Making information only available in paper format during office hours at particular locations is not compatible with the Aarhus Convention or with Directive 2003/4/EC, the AIE Directive. The resolution of this longstanding problem needs to be a part of the Strategy. We recommend that as a minimum the Strategic Plan commits the EPA to making all information which it has in electronic format available online.