Response ID ANON-JBHM-G44T-4

Submitted to Draft Environmental Principles Policy Statement
Submitted on 2024-10-25 15:00:01

Introduction

1 What is your name?

Name:
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2 What is your email address? (optional)

Email:
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3 Are you responding on behalf of an organisation?

Yes

If "Yes", Name of Organisation:
Sustainable NI

4 If so, which of the following best describes your organisation?

Sector:
Environmental NGO

Background and Purpose of EPPS

5 Do you believe the Introduction, Background and Purpose sections of the draft statement give the reader a good understanding of the aims and objectives of the EPPS?

Yes

Additional Comments:

6 Do you believe the importance of environmental protection and sustainable development is communicated adequately within the EPPS?

No

Additional Comments:

Sustainable Development

On page 4 the consultation says that sustainable development seeks to balance the 3 conceptual pillars of social inclusion, environmental protection and economic growth. This reflects old sustainability thinking that gives the three conceptual pillars equal importance. An argument against the traditional 'three pillars' approach is that it overlooks the foundational role of the environment in sustaining life and human society.

Unlike economic and social systems, which can adapt and recover more readily, environmental degradation often leads to irreversible consequences. Additionally, environmental systems form the base upon which social stability and economic prosperity depend. Therefore, prioritising environmental sustainability ensures that we maintain the natural resources and ecological stability required for future generations to thrive economically and socially. In short, by placing greater importance on environmental considerations, we build a more resilient foundation for sustainable social and economic progress.

Challenging the Growth Ideology

New definitions of sustainability increasingly reject the traditional emphasis on continuous economic growth because of the recognition that the earth's ecosystems and resources are finite. These more recent approaches to sustainability align with development models that acknowledge planetary boundaries, which are limits to the Earth's capacity to sustain human activity without triggering potentially catastrophic environmental changes.

Here are some key reasons why modern sustainability thinking is moving away from traditional economic growth models:

1. Finite Resources and Ecological Limits
• Traditional Growth Models: Economic growth has long been measured by GDP, which assumes that increasing production and consumption is always positive. However, these models often ignore the finite nature of natural resources, such as fossil fuels, water, and minerals, as well as ecosystems like forests and oceans.
• Ecological Reality: New sustainability frameworks recognise that the Earth has ecological limits, including limits on how much carbon dioxide can be

absorbed, how much biodiversity can be lost, and how much water can be extracted without destabilising natural systems. The planetary boundaries framework, introduced by environmental scientists like Johan Rockström, represent the Earth's critical systems. Crossing these boundaries risks triggering irreversible environmental degradation that could compromise life-support systems on Earth. New sustainability definitions argue that development should occur within these planetary boundaries to avoid tipping the Earth into unsustainable states, such as severe climate change or mass biodiversity loss. It challenges the assumption that perpetual economic growth is compatible with these ecological limits.

2. Decoupling Fallacy: Growth and Resource Use
• Decoupling refers to the idea that economic growth can be achieved while reducing environmental impacts, mainly through technological advances and efficiency improvements. However, there is growing scepticism about the feasibility of fully decoupling economic growth from resource use and environmental harm, especially at the global scale.
• Growth Limits: Many believe that even with improved technology, the sheer scale of resource extraction and pollution from continuous growth will eventually exceed Earth's carrying capacity. This has led to calls for "post-growth" or "degrowth" strategies, where well-being is prioritised over GDP growth.

3. Shifting Focus from Growth to Well-Being
• Well-Being Over GDP: Modern sustainability perspectives emphasise well-being, social equity, and quality of life as more meaningful goals than perpetual GDP growth. They argue that growth does not necessarily translate into improvements in health, happiness, or equity—especially if the environment is degraded in the process.
• Redistribution and Equity: A shift from growth to well-being also supports a more equitable distribution of resources, both within and between societies. It challenges the growth-centric model, which can exacerbate inequality by concentrating wealth and resources in the hands of a few while ignoring environmental degradation that disproportionately impacts vulnerable communities.

4. Critique of the Growth Ideology
• Post-Growth and Degrowth: Emerging sustainability schools advocate for economies that prioritise steady-state or well-being economies, which aim to maintain or reduce consumption and production to ecologically sustainable levels.
• Economic Alternatives: These models promote localisation, regenerative agriculture, circular economies, and other practices that respect ecological limits while ensuring human well-being. They challenge the capitalist model, which equates success with continual expansion.

Summary

New definitions of sustainability reject the concept of economic growth because they recognise that endless growth on a finite planet is not feasible. Instead, they promote development models that acknowledge planetary boundaries, focusing on maintaining ecological balance, ensuring long-term well-being, and addressing social equity. This shift is driven by the urgent need to mitigate climate change, prevent biodiversity loss, and live within the Earth's ecological limits while improving the quality of life for all.

Modern sustainability thinking should be reflected in the EPPS, acknowledging that ecological limits should be respected as they are essential for a functioning and healthy economy and society. These new definitions of sustainability call for transformative changes to the economy, recognising that sustainable development cannot occur without confronting the limits imposed by nature and prioritising wellbeing and social equity above growth.

Understanding the Statement and the Due Regard Duty

7 Is there enough information provided on the due regard duty to effectively assistpolicy makers to comply with the statement?

Yes

Additional Comments:

The Environmental Principles

8 Do you believe the descriptions of the 5 principles and advice for policy makers give adequate assistance to policymakers on how the principles should be applied?

No

Additional Comments:

The Department should provide a guide to support the implementation of the EPPS, which provides worked examples of the application of each principle in policy making, highlighting best practice where possible.

Monitoring and Reporting etc.

9 Departments will be required to monitor their compliance of the EPPS – do you believe the guidance given in the ‘Monitoring and Reporting’ section is sufficient?

No

Additional Comments:

We support the introduction of a toolkit for policymakers, including a recording template, to provide consistency across government. We recommend additional guidance on how the principles should be applied to policy making (as suggested in our response to Q8) is included in this toolkit.

We note that in this section of the EPPS, a comparison is drawn with the Equality Impact Assessment and the Rural Needs Assessment. The is a risk of developing too many screening exercises, which could lead to a decline in the quality of assessments. Given that sustainable development is in the scope of this policy statement, and 'People Planet and Prosperity' are the three central missions of the Programme for Government, we suggest that a single statutory impact assessment is created for 'Sustainable Decision-Making' that brings together environmental, climate, social and economic considerations and streamlines existing and future statutory screening requirements. Equality and rural considerations can be included in this assessment.

10 Do you have any other comments on the draft policy statement which are not covered by the previous questions?

No

Comments: