



Stronger Charities.
Stronger Communities.

DEPARTMENT OF HOUSING, LOCAL GOVERNMENT & HERITAGE: STATEMENT OF STRATEGY 2024–2025

Submission by The Wheel

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About the Charity, Community and Voluntary and Social Enterprise Sector

The community, voluntary, charity, and social enterprise sector is involved in every community in the country, providing health and social supports, services, and advocacy on behalf of people with disabilities, older people, young people, children, people experiencing poverty and disadvantage, and people at every stage of their lives.

In addition to its societal contribution, the sector makes a major contribution to the economy. It comprises approximately 35,000 organisations, involves almost 76,500 volunteer trustees, directly employs 281,250 people in charities alone (1 in every 8 employed people), and manages income of €25 billion per year. These organisations raise almost half of this income themselves, majorly subsidising the cost of public services in Ireland. When direct, indirect, and induced impact is considered, the sector had €32.1 billion in expenditure in 2022, and supported 321,000 jobs.¹

The breadth of the community and voluntary sector in Ireland is far reaching. Organisations provide vital services and supports in areas such as health and social care, community development, children and family services, and integration. They are at the forefront of the work to address the climate crisis and to advocate for human rights. The sector is integral to meeting the most important societal challenges and providing essential public services. For example, nearly 70% of all disability services are provided by voluntary organisations funded under Section 38 or Section 39 of the Health Act 2004.²

Housing, Local Government & Heritage

The community and voluntary sector works in many of the areas under the Department of Housing, Local Government and Heritage's remit. The ambitious goals outlined in the Statement of Strategy will not be possible to achieve without effective partnership working and engagement between Government and the sector.

Sector organisations provide social housing (through Approved Housing Bodies (AHBs)), tenancy protection and sustainment supports, and homelessness supports. They also provide dedicated supports and advocacy for those with specific accommodation needs, including older people, people with disabilities, Travellers, people seeking international protection, victims of domestic violence and LGBTQ+ people.

Community and voluntary organisations work closely with local government, providing vital community infrastructure, facilitating social inclusion through dialogue and restorative justice programmes, and increasing civic participation among young people and others.

Sector organisations have also been central to the protection of our built and cultural heritage, as well as leading on environmental advocacy and biodiversity initiatives.

¹ <https://www.charitiesregulator.ie/media/eqvh32ky/what-is-a-charity-rev-001.pdf>

² <https://www.gov.ie/pdf/?file=https://assets.gov.ie/154163/8fe32ca7-2154-4fb0-8a41-6931c5f15471.pdf#page=1>

Comments on the Department of Housing, Local Government and Heritage Statement of Strategy 2024–2025

Strategic Goal A: To provide a framework that ensures a sustainable housing system in Ireland with a supply of good quality housing to match the needs of all our people.

Ireland is continuing to experience a significant housing and homelessness crisis. In June 2024, for example, 11,992 people accessed homeless accommodation.³ In addition, since 2020 Ireland has seen a sharp rise, along with many other countries, in the cost of living. Increased energy costs and higher food prices across Europe and continue to have an impact on many people. **More than 560,000 people are at risk of poverty and more than 900,000 are living in enforced deprivation**, according to the latest figures released by the CSO. This represents a worrying rise of over 200,000 people going without basic necessities (enforced deprivation) since 2021.

These dual crises are having a combined impact that disproportionately effects specific cohorts of people. Lone parents with children younger than 25 and people unable to work due to long-standing health problems are most likely to be living in enforced deprivation (45.6% and 44.7% respectively). **Tenants are also more than four times as likely to be going without than people in households where the home is owned.**⁴ Charities, community and voluntary organisations, and social enterprises are at the coalface of supporting people who are most impacted by the housing crisis. **One in twelve charities has the specific charitable purpose of the relief of poverty or economic hardship.**⁵

However, persistent underfunding of the sector has led to frontline services being asked to do more with less. Many are experiencing a recruitment and retention crisis as salaries fail to keep pace with public sector operators. **These services provide a lifeline to those on the margins and should be adequately resourced to do this vital work in the face of increasing demand.** In a 2022 Pobal report, 29% of Pobal-funded organisations said that staff left because of salary levels, lack of development opportunities (21%), or preferred private or public sector employment (17%).⁶ This poses a significant risk to the continuation of these vital services.

Community and voluntary organisations also play an important role in producing research around housing and homelessness in Ireland. This is vital in understanding the true impact of the housing crisis on vulnerable people in both the short and long term, and in working towards solutions.

Below are recommendations that we believe are vital to ensuring a that a sustainable housing system in Ireland is achieved and that it matches the needs of all people. The Strategy should include commitments to:

- Implement the recommendations of the *Report of the Housing Commission 2024*⁷.
- Increase funding for organisations supporting tenancy sustainment and homelessness prevention.

³ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/300587/3e69c000-f06a-4759-83ce-16eff115779d.pdf#page=null>

⁴ Enforced Deprivation Survey on Income and Living Conditions (SILC): Enforced Deprivation 2023 - Central Statistics Office.

⁵ <https://www.charitiesregulator.ie/media/4733/crar2022.pdf>.)

⁶ <https://www.pobal.ie/research-analysis/early-years/>

⁷ <https://www.gov.ie/en/publication/f3551-report-of-the-housing-commission/>

- Provide access to diversified funding streams for AHBs, reducing reliance on debt funding for long-term sustainability.
- Deliver sustainable funding for organisations providing accommodation and supports to people on low incomes/the most marginalised.
- Provide ongoing support for regeneration schemes.
- Develop a roadmap for the delivery of affordable housing for all, to support both workers in the community and voluntary sector and the people they serve.
- Increase funding to organisations supporting older people and people with disabilities to live independently.
- Provide refuge and safe housing options for victims, providing them with secure, good quality step-down housing and necessary support.
- Develop inclusive housing solutions and dedicated emergency accommodation for LGBTQ_ people.
- Support organisations working with marginalised communities (for example, Travellers and LGBTQ+ people) to secure appropriate, safe accommodation.

Social Housing and Homelessness Supports

Key supports provided by the sector have targeted low-income households, with the provision of social housing (AHBs), tenancy protection and sustainment supports, and homelessness supports. This is increasingly challenging as more people find themselves in need of these supports. In 2023, 58,824 households were on local authority waiting lists for social housing, with 12,626 households, more than 1 in 5 of the total, waiting more than 7 years.⁸

23,500 households are living in the Private Rented Sector (PRS), which is unsuitable as a long-term solution to a social housing need. Of 12,000 households headed by lone parents, **8,000 have a housing need due to homelessness, an increase of 18.6% on the previous year**. This need should be addressed through an increase in capital supports for AHBs.

Currently AHBs primarily rely on debt finance to develop new homes, using state-backed as well as commercial finance. This is 100% debt financing, which is not sustainable in the medium to long term. It also makes Ireland an outlier in European housing systems. Where the not-for-profit sector provides a significant share of housing, part-funding via grants is common practice. Increased funding will improve AHBs ability to deliver lifetime social and affordable tenancies and thus reduce the State's reliance on the Housing Assistance Payment and other leasing schemes. Such funding security will also provide a stable base for those in the building sector, thereby supporting the continued economic recovery of the building industry whilst simultaneously delivering greater numbers of social and affordable homes. There is a need for AHBs to access diversified funding streams. Greater grant financing for deep energy retrofits and upgrades for AHB homes is also needed.

Additionally, the Strategy contains an aim to utilise existing heritage stock. To achieve this, we recommend continued support for regeneration schemes such as the Urban Regeneration and Renewal Fund, the Rural Regeneration and Development Fund and Town Centre First as well as programmes such as the Vacant Property Refurbishment Grant, the Built Heritage Investment Scheme and the Historic Structures Fund.

⁸ <https://www.gov.ie/en/publication/Odad4-summary-of-social-housing-assessments-2023-key-findings/>.

Affordable Housing

The average cost of purchasing a new home rose by 4.4% in the year to December 2023 and now stands almost 4% higher than the previous peak in 2007. Standardised average rents increased by 11% nationally, and 10% in Dublin in the year to Q3 2023.⁹ These increases in rent payments have not been matched with increased security of tenure for tenants, which has been called for by organisations supporting tenants.

Between 2013 and 2022, wages increased by 27% while house prices increased by 75% and rents increased by over 90%.¹⁰ **It is no longer affordable to live in the private rental sector for someone on an average wage.**

Lack of affordability is having an impact on all areas of social and economic life. In addition to an increase in demand for the supports offered by sector organisations working in the housing and homelessness sector, many organisations are experiencing difficulty recruiting and retaining staff due to lack of affordable accommodation in their area. Increasing the provision of affordable housing for all should be a priority for Government, to support both workers in the sector and the people they serve.

Accommodation for older people and people with disabilities

Accommodation in the housing market is often unsuitable for older people and people with disabilities who may need specific adaptations and supports. While the aim is to support people within their communities, this often requires investment in adaptations and the availability of additional services to ensure independence and a quality of living. While the number of, and expenditure on, housing adaptation grants for older people, people with disabilities, and mobility aids grants have returned to 2010 levels,¹¹ the shortfall in the intervening years is yet to be addressed. This means that many organisations supporting older people and people with disabilities are using their own resources to fund minor adaptations, where possible. With an increasing and ageing population, it is likely that this need will increase and should be resourced. Sector organisations require additional funding to support older people and people with disabilities to live independently.

Refuges and Safe Housing

In alignment with the government's commitment to a sustainable housing system in Ireland, and with the *Third National Domestic, Sexual and Gender-Based Violence Strategy*, it is essential to prioritise the safety and well-being of victims of domestic abuse. Sector organisations working at the coalface of gender-based violence have emphasised the need for development and maintenance of refuge and safe housing options for victims, providing them with secure, good quality step-down housing and necessary support upon leaving a violent relationship. Geographically distributed housing is needed to provide access for urban, suburban and rural victims, with design standards that guarantee all residents' safety, privacy and comfort.

Inclusive Housing for LGBTQ+ individuals

LGBTQ+ individuals in Ireland face significant challenges related to housing and homelessness. Data shows that 24% of LGBTQ+ people have experienced housing difficulties, with the figure rising to 46%

⁹ <https://www.rtb.ie/about-rtb/data-insights/data-hub/the-rtb-q3-2023-new-and-existing-tenancies-rent-index>.

¹⁰ https://data.oireachtas.ie/ie/oireachtas/parliamentaryBudgetOffice/2023/2023-10-05_housing-affordability-for-private-household-buyers-in-ireland_en.pdf

¹¹ <https://www.gov.ie/en/collection/0906a-other-local-authority-housing-scheme-statistics/#housing-adaptation-grants-for-older-people-and-people-with-a-disability-private-houses>.

among Trans and Intersex individuals. **LGBTQ+ individuals are less likely to own their homes and often struggle more to make ends meet, with financial problems affecting 40% of LGBTQ+ people and 60% of Trans and Intersex individuals.** The fear of discrimination and violence in emergency accommodations exacerbates the situation, making many hesitant to seek help. This vulnerability is underscored by Ireland's ranking as 23rd out of 28 EU countries for LGBTQ+ housing difficulties¹², highlighting the urgent need for targeted support and inclusive housing policies.

Addressing the intersecting needs of the LGBTQ+ community requires a multi-dimensional approach. The Department of Housing, Local Government, and Heritage has a significant role in developing and implementing inclusive strategies and fostering collaboration to build a more equitable, inclusive, and supportive society for everyone.

Traveller-specific Accommodation

Organisations working with local authorities to deliver Traveller-specific accommodation are in the unusual position that allocations are being made, but are not being drawn down, resulting in **persistent underfunding of accommodation and additional supports to Traveller communities**. A review by IHREC found that, between 2008 and 2018, €168.8 million was allocated for Traveller accommodation, with just €110.6 million (66%) being drawn down.¹³ In 2020, the system of allocating funding per local authority was replaced by a disbursement process whereby local authorities can apply for allocations for Traveller accommodation. In 2020 and 2021 the full central allocation was drawn down, but not every local authority utilised it.¹⁴

Organisations working within Traveller communities have a keen insight into the issues that affect the people they serve. Working together with local authorities to build strong, respectful relationships, together with adequate resourcing, will facilitate them to support the provision of this basic necessity. This process of engagement should be fully resourced and measures introduced to address the lack of accommodation support in local authority areas.

Housing for International Protection Applicants

21 years after the introduction of Direct Provision in Ireland, and heeding the concerns of civil society organisations, the Government published a White Paper on ending it.¹⁵ Shortly following its publication, however, Russia invaded Ukraine and the international protection landscape in Ireland changed with the introduction of the Temporary Protection Directive.¹⁶ While the measures initially provided for under the Temporary Protection Directive have largely been reduced, it was initially welcomed by organisations working in the international protection space as providing a blueprint for a new approach to international protection.¹⁷ Organisations working with marginalised communities require increased support to secure appropriate, safe accommodation.

¹² Source: [EU-LGBTI II Survey in All EU Member States](#)

¹³ <https://www.ihrec.ie/our-work/equality-review/>.

¹⁴ <https://www.oireachtas.ie/en/debates/question/2022-09-15/212/?highlight%5B0%5D=traveller>.

¹⁵ <https://www.gov.ie/en/publication/7aad0-minister-ogorman-publishes-the-white-paper-on-ending-direct-provision/>.

¹⁶ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:32001L0055>.

¹⁷ <https://www.socialjustice.ie/article/irelands-response-ukrainian-crisis-blueprint-better-future>.

Strategic Goal B: To provide a framework for the sustainable management of water resources from source to sea and for the provision of effective and efficient water services.

Water resources are an essential component of health, wellbeing and sustainability, as acknowledged by both the UN Sustainable Development Goals and Ireland's Well-being Framework¹⁸. We welcome the publication of the *Water Action Plan 2024* and the enhanced roles for the Environmental Protection Agency (EPA), Local Authority Water Programme (LAWPRO) and the National Parks and Wildlife Service.

Water body quality is an important sustainability indicator and access to clean water is vital for improving equality and achieving climate justice. It is also intrinsically linked to environmental protection and biodiversity issues. It is essential that marine and environmental protection groups are involved in the co-design of policy going forward.

We recommend:

- Engagement/co-design with environmental organisations on water resource management.
- Inclusive public consultation to ensure that equal access to high quality water resources.

¹⁸ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/301084/be52296f-93d8-40cb-ae99-aaa863e303fb.pdf#page=null>

Strategic Goal C: Recognising the large numbers of public bodies that local authorities now provide services on behalf of, work with and through policy and programme leaders across national and local Government to enable independent, democratic, responsive, innovative and effective local government. Ensure effective electoral management and high quality fire services and emergency management.

Mechanisms for meaningful engagement in local decision-making exist in every local authority area. The Public Participation Networks (PPNs) were established in 2014 to provide such a mechanism, and to move local decision making from purely representative democracy towards deliberative democracy.

A 2021 report by Social Justice Ireland captured how the various stakeholders, including local government, engaged in the participation process.¹⁹ The author noted the disparity between how the local authorities and other PPN stakeholders viewed participation, with local authorities having a much more positive impression of the relationships. **A key recommendation of the report, therefore, was to create a dialogue between the local authorities and the other PPN stakeholders to establish practical, best-practice approaches to implementing the principles of participation and working towards increasing partnership across all stages of the decision-making process.**

In 2022, the Department for Rural and Community Development published its *Values and Principles for Collaboration and Partnership*,²⁰ which copper-fastened the relationship and partnership between Government and the community and voluntary sector, highlighting its centrality in addressing the crises of recent times. Developed by the sector, in partnership with Government, the aim is to support values such as social justice and active participation along with principles like respect, collaboration, and value for money.

The *Values and Principles* apply to both central and local government, as well as state bodies, as a basis for their interactions with the community and voluntary sector in pursuit of the best outcomes for all communities. They provide a basis for respectful, inclusive engagement to reach our common goals. It is important that local government fully commit to social and community dialogue in line with the *Values and Principles*.

To enable independent, democratic, responsive, innovative and effective local government, we recommend:

- Dialogue between local authorities and the other PPN stakeholders to establish practical, best-practice approaches to implementing the *Values and Principles*, and working towards increasing partnership across all stages of the decision-making process.
- Sustainable funding for community organisations that work at a local level and provide vital infrastructure and supports.

¹⁹ <https://www.socialjustice.ie/content/publications/delivering-deliberative-democracy-participation-public-participation-networks>

²⁰ <https://www.gov.ie/en/publication/d4445-values-and-principles-for-collaboration-and-partnership-working/>

Strategic Goal D: To ensure that planning and building in our regions, communities and maritime area contributes to the delivery of sustainable and balanced development.

Sustainable and balanced development of our communities is essential to the wellbeing of everyone living in Ireland, as evidenced in the Well-Being Framework 2024. Access to green space, community facilities, and opportunities for civic participation for marginalised groups are just some of the essential elements of this strategic goal. Community organisations already play a key role in this, providing vital infrastructure at community level, fostering social dialogue, and leading climate action and sustainability efforts at grassroots level.

Community centres, local clubs, and volunteering opportunities create shared spaces where people from all backgrounds can come together. **These spaces provide opportunities for social interaction, networking, and mutual support, fostering a sense of belonging and solidarity among community members.**

Co-design of policy with community organisations is crucial for achieving balanced development as well as ensuring that Ireland meets EU Directives, UN obligations and planning legislation. Many advocacy organisations are also experts on human rights obligations in their particular areas, producing valuable research and holding key learnings about how these can be achieved in a local context.

To ensure delivery of sustainable and balanced development, the strategic plan should include:

- Planning sustainable and people-centred urban and rural communities.
- Investment in infrastructure to develop community spaces.
- Increased funding for services supporting marginalised communities.
- Co-design with community organisations to ensure a human-rights-based approach to planning, as well as equality and inclusion reviews for development projects.

Strategic Goal E: In the context of climate change and the impact of weather on Ireland, serve the whole of society through the production and communication of reliable weather and climate information to protect life and property and to further enhance Met Éireann's role as the authoritative voice on meteorology and climatology in Ireland.

We support the objective to produce reliable climate information, which is an important basis for addressing the climate emergency. The ambitions of this strategic goal should go further to include research on the impacts of changing weather and climate patterns. Protection of life and property will require a climate-justice approach, ensuring that resources and supports are fairly allocated and that no one is left behind. Planning and housing policies have a significant role to play in this and they are also central to ensuring Ireland's emissions reductions and other environmental goals.

We recommend:

- Research on the impact of climate change to ensure that a climate-justice approach to policy is taken by Government.

Strategic Goal F: To conserve, protect, manage and present our built, natural and archaeological heritage, and our biodiversity, for its intrinsic value and cultural identity, including to the environment as well as a support to local communities, regional economic development and sustainable employment.

Strategic Goal F covers extremely important areas of policy: biodiversity and heritage. Organisations in the community sector have been instrumental in advocating for protection of Ireland’s built, archaeological and cultural heritage for many years, and remain at the forefront of work to prevent the rapid loss of our biodiversity.

Ireland’s *Fourth National Biodiversity Action Plan 2023–2030* emphasises the urgency with which we must address widespread biodiversity in Ireland and the importance of a whole-of-government approach²¹, while the 2024 report on the Well-being Framework notes that “Only one of the eleven well-being dimensions shows a negative performance over time and in comparison internationally and this is the Environment, Climate and Biodiversity”.²² This department has an important role to play in local area-based conservation measures and ensuring that planning and development align with the Department’s obligations under the *Biodiversity Action Plan*.

We also believe that the objectives under Strategic Goal F on heritage should go further, reflecting commitments across Government to protect our cultural as well as built heritage. It is also important that heritage programmes highlight and preserve the contributions of marginalised and minority groups to Ireland’s cultural and historical heritage.

Finally, we recommend that the Strategy be more specific in encouraging traditional building skills, devising an apprenticeship programme with the sustainable construction sector. This would have the dual effect of helping to utilise existing heritage housing stock and conserving traditional building skills, which are under threat. Support for community organisations already leading this work is essential. We recommend:

- More significant engagement with the heritage agenda and the wide-ranging objectives in *Heritage Ireland 2030*, including objectives on cultural heritage.
- A shared-Island approach to all aspects of heritage and action on biodiversity.
- Preservation and protection of Ireland’s built and cultural heritage – going beyond awareness and appreciation.
- Investment in local action on climate and biodiversity, including funding for organisations working in this space.
- Investment in a “community connector” programme to develop an information and shared-learning space for organisations working to support biodiversity and tackle climate change.

²¹ https://www.npws.ie/sites/default/files/publications/pdf/4th_National_Biodiversity_Action_Plan.pdf

²² <https://www.gov.ie/pdf/?file=https://assets.gov.ie/301084/be52296f-93d8-40cb-ae99-aaa863e303fb.pdf#page=null>

Strategic Goal G: To provide a framework that assists the Department, local authorities and agencies to enhance digital services and accelerate, alongside our partners, the implementation of the United Nations Sustainable Development Goals (SDGs) through the use of data and digital technologies.

In pursuing our mission and goals, we will contribute to the implementation of the UN Sustainable Development Goals (SDGs), with the National Implementation Plan for Sustainable Development Goals 2022-2024 alongside our partners in central and local government.

The Wheel is a member of Coalition 2030, an alliance of over 60 civil society organisations working together to ensure Ireland keeps its promise to achieve the SDGs.²³ According to Social Justice Ireland's Sustainable Progress Index 2024, Ireland currently ranks 8th out of the EU14 countries in terms of progress towards the Goals.

The Department of Housing, Local Government and Heritage has a significant role to play in improving Ireland's progress towards achieving the SDGs. These include sustainable planning that incorporates heritage and biodiversity protection, inclusive and affordable housing solutions for all, conservation and maintenance of essential resources such as water, and effective and engaged local government.

The sector is also key to achieving greater progress, but **organisations need investment to support full implementation of Ireland's commitments to the Sustainable Development Goals to reach the furthest behind first**. Facing the climate crisis head on will continue to be a ground-up movement led by communities who understand the necessity of drastically changing the way our economy and societal structures work. To affect a just transition, change will require active public participation, belief in the rationale of the transition, and, moreover, the skills and capacity to engage with the process. The European commission suggests that meeting targets will require a mix of technology and societal changes, and 16% will come largely from behaviour change.²⁴

Developing green skills is fundamental to stimulating this behavioural change within communities and fully utilising digital technologies to meet climate goals. Sector organisations have a pivotal role to play and a responsibility to ensure that the transition to net zero is a just one. Government should therefore support improved climate literacy within organisations to develop an understanding of the impact of their work on the environment, and to be conscious of the responsibility that they have for a sustainable future, beginning with an increased investment for specific literacy programmes and community engagement specialists. **This is an important part of the move to digital technologies as a way to mitigate climate change.**

There is enormous potential for communities to drive this agenda at a local level, by **nurturing what is working already and growing new ideas** through innovation.

²³ <https://sdgs.un.org/goals>.

²⁴ https://cordis.europa.eu/programme/id/H2020_LC-GD-10-2-2020.

We recommend:

- Recognise the role of this Department in improving Ireland's progress towards the SDGs.
- Invest in the capacity of sector organisations to support the full implementation of Ireland's commitments to the Sustainable Development Goals to reach the furthest behind first.
- Developing awareness-raising initiatives for the SDGs at local level.
- Developing initiatives that enhance the resilience of vulnerable and marginalised communities to climate impacts, including community-based adaptation projects and support networks.
- Investing in social enterprises working in the circular economy.
- Legislating for sustainable business practices in areas under this Department's remit.

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