

Submission to the UN Committee on Economic, Social and Cultural Rights

A submission from the Northwest Human Rights Advocacy
Network, Ireland

Introduction

The Northwest region of Ireland includes the counties of Sligo, Leitrim and Donegal.

We have written this submission out of hope and concern for our region in the Northwest of Ireland. We do not claim to speak for our whole region but are expressing our views on our Government's implementation of the Convention based on our accumulated observations, data, and research relevant to our region. We hope our submission is fair, authoritative, and an authentic reflection of our regional needs and aspirations for our rights to be respected, protected and fulfilled under the Convention on Economic, Social and Cultural rights.

We have emphasised some rights that are of particular concern to us in this region, in the hope that others will present the wider national picture to the Committee. While it has been beyond the scope of this submission to address our concerns for our coastal fishing communities, for our unique artistic and religious culture, and for the vibrancy of our language, all specific to the Northwest region, we acknowledge their importance to the economic, social and cultural contribution to the Northwest population.

We are concerned that previous reports from the Irish government have neglected to detail progress on the need of our region for fairer regional development, to re-imagining life beyond the large urban centres, our cultural requirements, and the regional concerns for climate justice and mitigation of climate change for those of us from coastal and rural communities. We hope this Submission begins to reflect a more complete picture.

Structure of this Submission

This submission addresses the Convention in a sequential way, by engaging with each treaty article, in a case-by-case bases. In some instances, we have combined articles thematically.

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General Observations

Consultation with Civil Society in the Northwest Region.

We have observed that civil society in the Northwest region have not been engaged with in the formation of the Irish Government Report to the Committee. Prior to the Covid pandemic there was an emerging practice to ensure regional voices are included through various forums and through contact with regional universities in preparation of the Governments submission to the Committee.

We recommend that the Irish Government restores the practice of consultation with regional stakeholders, including rural and community representative bodies and organisations, prior to the drafting of their Irish Government submission to this committee and other treaty reports. We encourage the Irish Government, in line with their OECD commitments on Regional Development Policy to creating an enabling environment for participatory and deliberative processes involving all stakeholders and regional and local communities, including citizens, civil society, the private sector, labour groups, financial and educational institutions, and social partners, with adequate capacity and resources.¹

We recommend the Committee asks the Irish Government:

- a) What measures will the Irish Government take to improve consultation with regional, rural and coastal communities in the drafting of the next submission to the ESCR Committee?
- b) How will the Irish Government ensure that best practice in community engagement, including that technical support is made available in the drafting of Irish Government submissions to the ESCR Committee, and this is implemented across various international treaty reporting obligations?

Article 2 – Maximum Available Resources

Lagging behind: the impact of Unequal Regional Development on the Northwest Region

The recent European Commission (2021) Quarterly Report on the Euro Area detailed that ‘the duality of the Irish economy also results in strong regional disparities’, in Ireland and stated this inequality is ‘predominantly rural and remote regions, in the north, the west or along the border with Northern Ireland, are lagging behind. Without action this trend is likely to continue, as the Northern and Western region’s innovation system is only considered ‘moderate’ – the second lowest ranking for European regions’.² Furthermore, the European Commission (2021) Quarterly Report observed that this ‘regional dimension is an important factor’.³ Of real concern to us is the statement by the European Commission that ‘regional disparities are likely to continue growing in Ireland’. One remedy to this process is to provide clear disaggregated data that identifies disparities affecting the Northwest region, with progressive plans to address the gaps.

¹ OECD Recommendation of the Council on Regional Development Policy. OECD/LEGAL/0492. Adopted on: 08/06/2023. <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0492>. OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework," (Paris 2023). 43.

² European Commission, "2022 Country Report - Ireland,," in *Recommendation for a COUNCIL RECOMMENDATION on the 2022 National Reform Programme of Ireland and delivering a Council opinion on the 2022 Stability Programme of Ireland*. (Brussels 2022). 14

³ Ibid. 54. Annex 15.

A more recent OECD Report (2023) has again highlighted the Border and Northwest region ‘lags behind other European regions in many other dimensions’, and observes that ‘while showing strength in innovation and social cohesion, faces challenges with its economic results, education, and infrastructure, including digitalization and transport’.⁴ Furthermore the OECD Report (2023) detailed the Northwest, ‘demonstrate untapped potential for sustainable development’.⁵ In addition, the OECD Report (2023) has highlighted that Ireland is currently highly centralised institutionally, with regional policy in Ireland ‘currently operating in siloes’.⁶ The Report recommends initiatives to address issues related to infrastructure, utilities, and local and regional development, and further development in regional government and policy making.⁷ Finally, the Report recommends ‘the empowerment of actors across levels of government, civil society and the private sector to be involved in policy design’.⁸

We recommend the Committee asks the Irish Government:

- a) To demonstrate a commitment to addressing regional disparities in economic, social and cultural development in the Northwest region?
- b) Can the Irish Government make available to the ESCR Committee relevant data that is clearly disaggregated on the Northwest region to support initiatives to increase balanced regional development?
- c) How is the Irish Government engaging actively with regional and local communities and stakeholders throughout the policy-making cycle to gather and co-produce the knowledge needed to identify the Northwest region’s needs and build capacity?

Article 3 – Equal Rights of Men and Women to enjoy ESCR.

The States Parties to the present Covenant undertake to ensure the equal right of men and women to the enjoyment of all economic, social and cultural rights set forth in the present Covenant.

Gender Work And Wage Gap

Internationally the gender work and wage gap, which result in gender income gaps, are recognised as primary indicators of gender inequality (Doorley and Keane, 2022) (Gov, 2022). At an EU level progress can be seen through the commencement of Gender Pay Gap Reporting. Nationally, the Irish Government have made efforts to mitigate these inequalities through female focused initiatives including, but not limited to, adopting the National Strategy for Women and Girls (2017 -2020), establishing the Balance for Better Business Review Group and promoting high level government objectives regarding early learning and childcare funded programmes. A referendum to amend Article 41.2 from Bunreacht na hÉireann (Constitution of Ireland) which upholds that the state will ‘endeavour to ensure that mothers shall not be obliged by economic necessity to engage in labour to the neglect of their duties in the home’ is scheduled for March 2024. While these initiatives signify debate and recognition of these economic, social and cultural inequalities, they also highlight the inequality which continues to prevail.

⁴ OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework." 22.

⁵ Ibid. 22.

⁶ Ibid. 9, 25.

⁷ Ibid. 10.

⁸ Ibid.

The Balance for Better Business Review Group (2022) Annual Report sets progressive and measurable goals to address workplace inequalities, highlighting the importance of gender balance on board and leadership teams. Ireland has progressed into the top 10 EU member states for gender representation in board and leadership teams moving forward 21 percentage points in 5 years (Gov, 2023). Although these figures are generally promising, figures show that for large Irish-owned private companies and multinationals, the levels of female representation have stagnated.

Additionally, the firms considered in the review are primarily ISEQ20 and large private listed companies of which few to none have headquarters in the Northwest region. The reported statistics for Multinationals and Irish owned private companies, which may have a regional spread, show missed targets of percentage of women in leadership. Even the Financial sector, which displays gender balance at third level and early career stage, is underrepresented at senior levels highlighting the need to address inequalities in the pipeline to leadership within organisations and representation at C-suite and board level.

At a regional level the Western Development Commission report that 2022 Census figures reveal over 50% of the population of Western Ireland is female. In the Northwest population growth from census 2016 to census 2022 figures reveal growth from 5% in Donegal to 9.8% in Leitrim (1.4% above national average), with most people in each county living in rural areas, 84.1% in Leitrim compared to a national average of 36.3%. Coupled with this percentage of rural dwellers, Leitrim has the fourth highest average age population nationally while all three report above-average age and unemployment rates with Donegal reporting the highest long term unemployment rates at 64%. Similarly, the female labour force participation rate for Sligo, Leitrim and Donegal is below state average for each county (WDC, 2022).

Reports such as the CSO Survey on Income and Living Conditions (SILC) 2022 and the Gender Balance in Business Survey 2023 further highlight inequalities in our country but are not reported at a regional or county basis. The Commission for the Economic Development of Rural Areas (CEDRA), which was established in 2012, published a report in 2019 with over thirty recommendations on the economic development of Rural Ireland. While this report and its recommendations are welcomed no specific reference to the gender issues in the region are addressed, nor are any specific references made to the Northwest region. Current research by the ESRI is exploring gendered patterns in employment, care and job characteristics in Ireland and Northern Ireland. While this is a welcome research focus the non-regional specific nature of such research limits the relevance to the Northwest. Additionally, the Northwest Regional Enterprise plan to 2024, which is focused on innovation growth, sustainability, capital investment and tourism development among others has a strong regional focus but lacks a reference to gender balance and equality across these thematic areas.

We recommend the Committee asks the Irish Government:

- a) To prioritise the need for a national and regional plan to support a gender balanced workforce, including succession planning skills for large and small businesses at board and executive level sustained by a gender balanced pipeline plan.
- b) Provide structural support to women in Northwest Ireland to assist in full involvement in the workforce, including flexible working practices, supports to female entrepreneurs and women in STEM, and childcare costs.
- c) Monitor and compare regional and national progress in relation to gender inequalities.
- d) Prioritise regional supports, including training and mentoring, to enhance and develop workforce skills for both men and women.

- e) Mandate public body reports to provide disaggregated data to address regional and gender considerations.

Article 6 – the Right to Work.

‘everyone to the opportunity to gain his living by work which he freely chooses or accepts, and will take appropriate steps to safeguard this right’.

Work in Rural and Coastal Regions

The Northwest region has an aging population, this is further impacted by a decline in the age range from 20 – 44 years due to emigration and migration to larger centres of employment (NwRA, 2020). Added to the issue of outward migration from the region, a significant issue is sustainable job creation and talent retention.⁹ The OECD (2023) has recommended going beyond the Business-as-usual model that is solely employment-led, to policies that can rethink regional attractiveness for inclusive and sustainable development.¹⁰ With the majority of the population for each county of Sligo, Donegal and Leitrim living in rural areas specific supports are required for rural towns in the North-West region to address rural decline.¹¹ These supports include, but are not limited to, access to local employment, transport, education and training.¹²

Recent research in rural Ireland has highlighted incidents of possible forced car ownership.¹³ Forced car ownership occurs for those who experience low public transport accessibility and low income. While this is not uncommon in many regions, there is evidence that rural regions, particularly in the Northwest of Ireland are reliant on higher levels of car dependency. The intersection of high social deprivation, transport disadvantage leading to high share of single car ownership is highlighted in the Northwest region.¹⁴ The results have shown the need for investment in rural public transport.¹⁵

In addition, 2023 figures indicate Sligo, one of the main regional cities, has the highest commercial vacancy rate in the state at 19.9% (5.8% higher than the national average of 14.1%). Further to the Northwest, Donegal has the 3rd highest vacancy rate at 17.9% and Leitrim also above average at 16.8%.¹⁶ In order for the region to meet growth and population targets planning and delivery of increased job creation and employment are required, through new investment, supporting existing businesses and fostering entrepreneurship. To support this goal all members of the community require access to necessary skills to meet current and future employers’ needs.¹⁷

We recommend the Committee asks the Irish Government:

- a) To prioritise the need for sustainable economic development in the Northwest region to encourage the development of regional jobs with a focus on high value and future focused employment,

⁹ Ibid.

¹⁰ Ibid. 54.

¹¹ NwRA. *Regional Spatial and Economic Strategy 2020 -2032 (RSES)*. Northern & Western Regional Assembly (Roscommon, Ireland January 2020).

¹² KPMG. *Sligo 2030 One Voice One Vision*. (Dublin, Ireland 2023).

¹³ P Carroll, R Benevenuto, and B Caulfield, "Identifying Hotspots of Transport Disadvantage and Car Dependency in Rural Ireland," *Transport Policy* 101 (2021). 46-56.

¹⁴ Ibid. 46-56.

¹⁵ OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework."

¹⁶ ESRI. *Annual Report on Migration and Asylum 2022*. Dublin, Ireland The Economic and Social Research Institute., 2023.

¹⁷ KPMG. *Sligo 2030 One Voice One Vision*. (Dublin, Ireland 2023).

thereby supporting the retention and return of workers and addressing the aging population problem.

- b) Increase public transport and connectivity in the Northwest region to ensure access to employment and education or training for all members of society.
- Prioritise identification and engagement with vacant property owners in the Northwest region with a vision to identify redevelopment and repurposing opportunities to address above average commercial vacancy rates in the region.

Article 6, 7, 8, 12 - Business and Human Rights

[Article 6 – the right to work; Article 7 - just and favourable conditions of work; Article 8 - join a trade union; Article 12 - the highest attainable standard of physical and mental health.]

SME's and Human Rights

Unlike other European countries, Ireland currently has no legislation to address business and human rights.¹⁸ The first National Action Plan for Business and Human Rights was developed and spanned from 2017 to 2020, based on the United Nation, based on the United Nations Guiding Principles for Business and Human Rights.¹⁹ Recently, the Department of Foreign Affairs has called for interested stakeholders to submit their views on a proposed second National Action Plan for Business and Human Rights.²⁰

In the interim European Union has brought forward new Directives about Corporate Sustainability Reporting and Due Diligence in the value chain.²¹ The Implementation of the Corporate Sustainability Directives will begin next year. While the Northwest region is predominantly made up of SMEs and micro-businesses and will consequently bear no direct obligation under the due diligence directive, they will likely be compelled by their larger buyers that are subject to these regulations to provide due diligence data.²²

As is commonly observed, the financial and resource burden of providing this data is often borne by the supplier.²³ Although some of the more major auditing firms provide these services, they will be expensive, and many SMEs will lack the in-house resources to gather or monitor this data

¹⁸ Lise Smit et al., *Study on Due Diligence Requirements through the Supply Chain* (Publications Office of the European Union Luxembourg, 2020).

¹⁹ Department of Foreign Affairs, "National Plan on Business and Human Rights (2017- 2020)," news release, 2023, <https://www.gov.ie/en/publication/5bf5e-national-plan-on-business-and-human-rights-2017-2020/>. See also Shane Darcy, "Embedding Business & Human Rights in Ireland: Legislating for Human Rights Due Diligence," *Available at SSRN 3506384* (2019).

²⁰ Department of Foreign Affairs, "National Plan on Business and Human Rights," news release, 2023, <https://www.gov.ie/en/publication/ed78a-national-plan-on-business-and-human-rights/>.

²¹ European Union, "Corporate Sustainability Due Diligence Directive," in *Directive (EU) 2022/0051* (European Union 2022). "Corporate Sustainability Reporting Directive," in *Directive (EU) 2022/2464* (Brussels: European Union, 2022).

²² European Commission, "Corporate Sustainability Due Diligence," news release, 2022, https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en.

²³ Martin C. Schleper et al., "When It's the Slaves That Pay: In Search of a Fair Due Diligence Cost Distribution in Conflict Mineral Supply Chains," *Transportation Research Part E: Logistics and Transportation Review* 164 (2022). Vivek Soundararajan, "The Dark Side of the Cascading Compliance Model in Global Value Chains," *Journal of Industrial and Business Economics* 50, no. 1 (2023).

themselves, inducing a greater financial strain.²⁴ This has naturally raised concerns regarding the economic livelihoods of SMEs, and their respective employees, across the European Union.²⁵

The Northwest, as a geographic area primarily composed of small businesses, may be particularly at risk of economic hardships without adequate government guidance and support.²⁶ Currently, the government recommends availing of the Green Transition Fund and utilising the Climate Toolkit 4 Business for carbon-related sustainable development and impact assessments.²⁷ On the other hand, there is currently no guidance provided on the Corporate Sustainability Due Diligence from statutory agencies.

We recommend the Committee asks the Irish Government:

- a) How will the National Action Plan on Business and Human Rights align itself with the incoming EU Directives on Corporate Sustainability?
- b) What supports will be in place to protect and guide small businesses, and the reliant economic livelihoods of their employees in the Northwest of Ireland under these changing regulatory environments?
- c) With the ultimate goal of comparable and homogenous data flows across the EU, what initiatives and frameworks does the State intend to develop to ease the transition burden for Irish businesses, and particularly SMEs, under these sustainability reporting and due diligence requirements?

Modern Slavery

[article 7 – recognition of a constitutional right to a safe, clean, healthy, and sustainable working environment; article 10 – protection of children; article 11 – right to adequate standards of living; Article 12 – right to physical and mental health]

It is understood that modern slavery exists in every supply chain and country on the planet, with 50 million people estimated to be living in modern slavery.²⁸ There is no universally agreed-upon definition of modern slavery, however almost every definition includes elements of control and exploitation. Consequently, it shares much in common with the concept of worker exploitation, with elements including below minimum wage, excessive working hours, and often dangerous working conditions in which inadequate training and equipment have been provided.²⁹ Roughly a quarter of all victims of modern slavery are children according to the Walk Free Foundation and International Labour Organisation (ILO), therefore also constituting child labour issues.³⁰

²⁴ Peter Wollmert and Andrew Hobbs, "How the Eu's New Sustainability Directive Is Becoming a Game Changer," news release, 2022, https://www.ey.com/en_ie/assurance/how-the-eu-s-new-sustainability-directive-is-becoming-a-game-changer.

²⁵ Silvia Ellena, "Eu Countries Divided over Proposed Corporate Accountability Rules," Euractiv, <https://www.edie.net/eu-countries-divided-over-proposed-corporate-accountability-rules/>.

²⁶ Department of Enterprise Trade and Employment, "Regional Enterprise Plan to 2024: North West," (Dublin 2022).

²⁷ Government of Ireland, "Climate Toolkit 4 Business: Start Your Zero Carbon Journey," Government of Ireland,, <https://www.climatetoolkit4business.gov.ie/>.

²⁸ Anti-Slavery International, "What Is Modern Slavery?," <https://www.antislavery.org/slavery-today/modern-slavery/>. International Labour Organisation, Walk Free, and International Organisation for Migration, "Global Estimates of Modern Slavery: Forced Labour and Forced Marriage,," (Geneva 2022).

²⁹ International Labour Organisation, Walk Free, and International Organisation for Migration, "Global Estimates of Modern Slavery: Forced Labour and Forced Marriage."

³⁰ Ibid.

Contrary to popular belief, this violation of the most fundamental of human rights is not limited to the developing world, with instances being detected in the USA and UK.³¹ In Ireland, it has been estimated that there are (at least) 8,000 victims of modern slavery.³² In response, the UK and Australia have introduced Modern Slavery Acts, to improve transparency and tackle the issue.³³ Given the absence of existing Irish regulation, this submission highlights concern of the likelihood and growth of modern slavery in Ireland, and particularly in the Northwest as an economically disadvantaged area. This is an issue that spans across many rights, such as the rights of the child through to child labour, the psychological and physical detriment of poor and slave-like working conditions modern slavery can induct, and the dangerous and poor living conditions that victims of this must experience. As evidence emerges of human (and child) trafficking to the country, for both labour and sexual purposes, there are fears this is just the tip of the iceberg.³⁴

We recommend the Committee asks the Irish Government:

- a) Does the State believe its current stance on modern slavery and labour exploitation is sufficiently robust?
- b) What measures will the Irish Government take to protect the socio-economically vulnerable members of society, particularly refugees and migrants from those who would take advantage and exploit them for financial gain?
- c) What judicial and non-judicial mechanisms will the state develop to provide remedies for victims of modern slavery?
- d) What supports will be made available to SME's in the Northwest region that may indirectly fall under the scope of the Directives because they are part of the supply chain for the in-scope businesses.

Article 11 – right to adequate standards of living

[everyone to the opportunity to gain his living by work which he freely chooses or accepts, and will take appropriate steps to safeguard this right]

Homelessness and housing in the Northwest region.³⁵

Ireland is experiencing a housing crisis with key performance indicators for the sector indicating little improvement. In 2014 the Department of Environment, Community and Local Government recorded 2,858 homeless people in the country this has risen to a reported 9188 adults homeless in October 2023.³⁶ The number of families recorded in 2014 was 407 with 880 dependent children living in emergency accommodation which has risen to 1,939 with 3,911 dependent children out of home in Oct 23. All regions have recorded an increase in homelessness during this period

³¹ Hannah Dreier, "As Migrant Children Were Put to Work, U.S. Ignored Warnings," *The New York Times* 2023; Holly Bancroft, "UK's Modern Slavery Programme at 'Breaking Point' as Demand from Victims Soars," *The Independent (UK)* 2023.

³² Chartered Accountants Ireland, "Modern Slavery," News Release, (2022)
<https://www.charteredaccountants.ie/sustainability-centre/resources/modern-slavery>.

³³ *Modern Slavery Act 2015, 30 (UK Parliament 2015); Modern Slavery Act 2018, C2018A00153 (Australian Government 2018)*.

³⁴ IHREC, "Irish Human Rights and Equality Commission (IHREC)," (Dublin 2023).

³⁵ Morley Economic Consulting and Sligo Social Services, "Homelessness in Sligo. Identifying the Pathways into Homelessness, and the Strengths, Weaknesses, Opportunities and Threats to Homeless Service Provision.," (Dublin/Sligo 2022).

³⁶ See Homeless Data, Department of Housing, Local Government and Heritage.
<https://www.gov.ie/en/collection/80ea8-homelessness-data/>

including the North-West region with the number of homeless adults increasing from 31 to 130; the number of homeless families has risen from 1 to 13, and the number of homeless dependent children has gone from 1 to 29 children. These homeless figures reflect only those living in emergency accommodation and do not capture those who may for example, be sleeping rough, 'couch-surfing', living in overcrowded or unfit accommodation, in women's shelters, etc. Including all of these categories in official numbers the level of emergency would likely be many factors worse.

The challenges for people in homelessness, and those facing the threat of homelessness, have broadened over the past decade. While relationship and personal factors, such as marital/family breakdown and substance misuse still play a significant role for a large cohort of homeless individuals, structural factors e.g., housing supply and affordability, have become a much greater issue.³⁷ For many years there has been an over reliance on the Private Rented sector to meet the needs of those who qualify for social housing through rent supplement and Housing Assistant Payments (HAP). This, combined with a lack of home-building in the private market from 2008 and increased demand from a growing population, has led to record increases in rents. However, the private rented sector is also undergoing a seismic shift with the numbers of private rented properties available to rent steadily declining since 2016 as small and medium landlords leave the market.

Between 2016 and 2022 there has been a 23% decrease in the number of private rented tenancies registered with the Residential Tenancies Board (RTB).³⁸ Rents during this period have escalated as supply has reduced. While 2023 data from Daft.ie shows that there has been some improvement in the availability of rental homes in recent months, they also point to two important qualifications regarding this improvement.³⁹ The first being that the April 2022 Census shows that in the 2016 to 2022 period, the number of occupied dwellings rented from a private landlord increased by 9% to over 330,000, and as such the availability of 1800 homes on the rental market is nowhere near sufficient.⁴⁰ The Daft report estimates that the supply should be closer to 6,000.

The other issue of note is that the improvement in supply is concentrated in Dublin, with more homes available to rent which puts less upward pressure on rents there. Given that the market improvement is Dublin centred and not distributed regionally the ease-off in rental inflation is also concentrated in the Dublin area whereas compared to a year ago, market rents in Connacht-Ulster are 16.1% higher with Donegal showing the highest increase at 20.2%.⁴¹ With such significant increases in monthly rent levels, current and future tenants are facing ever deteriorating affordability.

Social Justice Ireland in their Housing and Poverty (2022) Report show that one-third of private renters living without housing supports are at risk of poverty once their rent is paid.⁴² Even starker is the situation for renters in receipt of a social housing support – more than half of whom are at risk of poverty after their monthly rent commitment is met. Not only does the analysis show the dysfunction and inequality in the private rental market, but it also portrays the failure of housing

³⁷ Morley Economic Consulting and Sligo Social Services, "Homelessness in Sligo. Identifying the Pathways into Homelessness, and the Strengths, Weaknesses, Opportunities and Threats to Homeless Service Provision.."

³⁸ RTB Private Tenancy Registration Statistics. <https://www.rtb.ie/data-hub/rtb-private-tenancy-registration-statistics>

³⁹ Ronan Lyons, Daft.ie, Irish Rental Report Q3 2023.

⁴⁰ Census of Population 2022 Profile 2 - Housing in Ireland

⁴¹ Ronan Lyons, Daft.ie, Irish Rental Report Q3 2023.

⁴² Social Justice Ireland, "Housing and Poverty 2022," (Dublin, January 2022).

supports as a long-term housing solution. The Irish housing market is in crisis and the knock-on consequences on private renters, and the most vulnerable in society, are stark. The Northwest continues to be severely affected by lack of housing supply and escalating rents.

We recommend the Committee asks the Irish Government:

- a) Conduct a State-level revision of HAP rent limits in line with market rents, for all cohorts, and a review of the HAP scheme more generally to ensure it is fit for purpose.
- b) At a national level, develop a consistent and comprehensive definition of homelessness such as ETHOS - European Typology of Homelessness and housing exclusion, and gather timely data on this basis.
- c) We recommend that the government provide a regional breakdown with clear disaggregated data of the intersection of poverty and housing to enable informed regional planning and budgeting for future housing provision.

Article 12 – Right to Physical and Mental Health

Youth Mental Health Services and the NW Region

By the age of 13 years, 1 in 3 young people are likely to have experienced some type of mental disorder and by 24, that rate will have increased to over 1 in 2 according to Leahy et al, (2013). McGorry et al., (2014) assert that mental ill-health contributes 45% of the overall burden of disease for young people aged 10-24 years, with Vyas, Birchwood & Singh, (2015) who believe that the focus on youth mental health is crucial given their findings that 50% of all adult mental disorders begin before the age of 16 and 75% before the age of 25 years.⁴³

In 2012 The European Psychiatric Association (EPA) guidance on the prevention of mental disorders outlined that various psychiatric conditions can be prevented through effective early interventions and promotion of mental wellbeing.⁴⁴ These interventions which can be placed within the community are particularly important in childhood and adolescence. In Ireland the National Youth Mental Health Task Force *Report*, (2017) advocated for the establishment or enhancement of Primary Care delivered early intervention youth mental health services.⁴⁵

The Sligo/ Leitrim/ West Cavan children and young people's psychology service consists of Primary Care Psychology (lifespan), Child and Adolescent Mental Health Services (under 18), Adult Mental Health Services (over 18), Children's Disability Services (0-18) and Adult Disability Services (over 18). There continues to be substantial waiting lists in HSE psychology services – CAMHS, Primary Care Psychology and the Children's Disability Psychology Services. There are

⁴³ Dorothy Leahy et al., "Primary Care and Youth Mental Health in Ireland: Qualitative Study in Deprived Urban Areas," *BMC Family Practice* 14, no. 1 (2013). See McGorry, P., Goldstone, S., Parker, A., Rickwood, D., & Hickie, I. (2014). Patrick D McGorry et al., "Cultures for Mental Health Care of Young People: An Australian Blueprint for Reform," *The Lancet* 1, no. 7 (2014). See also N. S. Vyas, M. J. Birchwood, and Swaran P. Singh, "Youth Services: Meeting the Mental Health Needs of Adolescents," *Irish Journal of Psychology* 32, no. 1 (2015).

⁴⁴ J. J. Campion, K. Bhui, and D. Bhugra, "European Psychiatric Association (EPA) Guidance on Prevention of Mental Disorders," *Eur Psychiatry* 27, no. 2 (2012).

⁴⁵ Department of Health. (2017). The National Youth Mental Health Task Force Report. <https://assets.gov.ie/16035/e2b9a4c9d9c44719bc4edcccb0fe9e5e.pdf>

currently 194 young people on the CAMHs waiting list and should a consultant psychiatrist position be vacated as anticipated this number will undoubtedly increase.⁴⁶

The YMHI Mind Your Head study (2014) clearly set out the mental health needs of young people in Sligo/ Leitrim and reviewed the related statutory and community and voluntary resources.⁴⁷ A need for a brief intervention service was identified, and the YMHI submitted a Business Case to the HSE in 2015 for additional services to support the mental health and wellbeing needs of young people in Sligo/Leitrim/West Cavan. In the intervening years, anxiety and depression in young people has increased, with more than four in ten adolescents and more than one in two young adults in Ireland experiencing anxiety and depression outside of the normal range.⁴⁸ Despite all efforts Sligo/Leitrim/West Cavan still do not have an Early Intervention Youth Mental Health Service.

We recommend the Committee asks the Irish Government:

1. What is the government going to do to address the long waiting lists for youth mental health care in the Northwest?
2. How will the government address the need for Early Intervention Youth Service for Sligo/Leitrim/West Cavan?

Addiction Treatment Services and the Northwest Region.

The European Monitoring Centre for Drugs and Drug Addiction reports reveal Ireland, along with Sweden, holds the highest drug-related death rate in Europe.⁴⁹ Ireland's high death rate is partly linked to the neglect of human rights standards in drug policy, such as the right to health.⁵⁰ Alcohol is the most widely abused drug in rural communities.⁵¹ Furthermore, research indicates a significant level of unmet treatment for alcohol consumption in Ireland.⁵² Communities in the Northwest face distinct barriers to access addiction treatment, including transportation, anonymity, and fewer treatment facilities.⁵³ There is an expressed concern about the government's commitment to quality treatment, coupled a concern regarding an overreliance on faith-based treatment, which may result in creating a barrier to treatment. Those concerns

⁴⁶ Community Healthcare Organisation 1 (CHO 1) Child and Adolescent Mental Health Services Report 2022 – 2023 <https://www.mhcirl.ie/sites/default/files/2023-08/CHO%201%20Report%20FINAL.pdf>

⁴⁷ Michele Glacken et al., "Mind Your Head. Study of Youth Mental Health in Sligo, Leitrim and West Cavan.," in *Strategic Planning Process: Part 1 of 2 Youth Mental Health Initiative*, (Sligo, October 2014,).

⁴⁸ Dooley, B, O'Connor, C, Fitzgerald, A, & O'Reilly, A. (2019). My world survey 2: national study of youth mental health in Ireland <http://www.myworldsurvey.ie/download.php>

⁴⁹ European Monitoring centre for drugs and drug addiction (2022) European Drug report trends and developments. Lisbon: Publisher or Available at: https://www.emcdda.europa.eu/publications/edr/trends-developments/2022_en (Accessed: 3/12/23).

⁵⁰ ICCL (2015) Submission to the House of the Oireachtas joint committee on justice, defence and equality on the review to Ireland's approach to the possession of limited quantities of certain drugs. Available at: <https://www.drugsandalcohol.ie/25444/1/ICCL%20Submission%20to%20Oireachtas%20JCJED.pdf> (Accessed: 3/12/23).

⁵¹ Keane, M (2015) Urban and rural youth attending a treatment centre. *Drugnet Ireland*, Issue 52, Winter 2014, pp. 11-12.

⁵² Health Research Board (2019) *National Drug Treatment Reporting System, 2013-2019, Alcohol Data*. Available at: https://www.hrb.ie/fileadmin/2_Plugin_related_files/Publications/2020_publication-related_files/2020_HIE/NDTRS/Alcohol_bulletin/Alcohol_treatment_in_Ireland_2013_to_2019.pdf (Accessed: 3/12/23). See also, Carew, A., O'Neill, D., Lyons, S. et al. Estimating need for alcohol treatment in Ireland using national treatment surveillance data. *Ir J Med Sci* **191**, 1521–1529 (2022). <https://doi.org/10.1007/s11845-021-02788-9>.

⁵³ Pullen, E. and Oser, C. (2014) 'Barriers to Substance Abuse Treatment in Rural and Urban Communities: councillor perspectives', *Substance Use and Misuse*, Available at: DOI 10.3109/10826084.2014.891615.

include moral judgements, lack of expert knowledge, safeguarding, and staff training.⁵⁴ These concerns are further compounded by recent changes in demographics that have shown in the census 2022, a 187% increase in the number of people with no religion compared with the census in 2011.⁵⁵ In our view, HIQA oversight of all treatment services nationally is required to establish standards, inspections, and regulations for these facilities and ensure they align with modern human rights-based services.⁵⁶

We recommend the Committee asks the Irish Government:

- a) Does the government believe there are sufficient resources for substance misuse treatment in the Northwest region?
- b) How do current treatment facilities provide non-denominational treatment services in the Northwest region of Ireland?

Climate Mitigation and the NW Region

The Human Rights Council has recently recognised that all people everywhere have the right to clean, healthy, and a sustainable environment in resolution 48/13 (2021),⁵⁷ and the General Assembly in its resolution 76/300 (2022) confirmed that the right to a clean, healthy and sustainable environment is a human right.⁵⁸ The resolution further recognised that sustainable development, in its three dimensions (social, economic and environmental), and the protection of the environment, including ecosystems, contributes to and promote human well-being and the full enjoyment of all human rights, for present and future generations. Similarly, the right to a healthy environment has been progressively recognised by states.⁵⁹

As a remote and rural and coastal community in the Northwest of Ireland, we are deeply aware of the impact of climate change, and the wider shared responsibilities for mitigation efforts.⁶⁰ The Northwest region of Ireland, along with the rest of country, could be exposed to 1 metre of sea-level rise and 1.9 degrees Celsius warmer temperatures in the Irish Sea, by 2100.⁶¹ We are concerned that current adaptation plans and climate action strategies do not incorporate plans for long-term climate planning and adaptation. The counties in the Northwest have also been increasingly facing more frequent and intense climate hazards, such as windstorms, riverine and coastal flood events, heatwaves and droughts, coastal erosion, and snowfall events as well as changes in temperature (up to 1.6 degrees warmer by 2050 and 0.7 degrees warmer in 1981-2010 compared to 1961-1990) and precipitation patterns (up to 17% reduction in precipitation in summer and 19% increase in precipitation in winter). Ireland has also experienced extreme

⁵⁴ Alcohol Action Ireland (2021) *Alcohol treatment services: A snapshot survey 2021*. Available at: https://alcoholireland.ie/download/reports/AAI_AlcoholTreatmentServices_A-Snapshot-Survey-2021.pdf (Accessed: 4/12/23).

⁵⁵ Central Statistics Office (2023) *Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travelers and Religion*. Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/religion/> (Accessed: 12/12/23).

⁵⁶ Alcohol Action Ireland (2021) *Alcohol treatment services: A snapshot survey 2021*.

⁵⁷ Human Rights Council, *The human right to a clean, healthy and sustainable environment* A/HRC/RES/48/13 58 UN. General Assembly (76th sess.: 2021-2022). The human right to a clean, healthy and sustainable environment: resolution / adopted by the General Assembly A/RES/76/300. [New York]: UN, 1 Aug. 2022, GAOR, 76th sess., Suppl. no. 49.

⁵⁹ Committee on Economic, Social and Cultural Rights, general comment No. 14 (2000) On the right to the highest attainable standard of health, para. 33.

⁶⁰ The Citizens' Assembly, "Report of the Citizens' Assembly on Biodiversity Loss," (Dublin, 2023).

⁶¹ KPMG, "Sligo County Council. Climate Change Risk Assessment," in *KPMG Sustainable Futures*, (Dublin/ Sligo, 2023).

droughts in 1803–1806, 1854–1859, 1933–1935, 1944–1945, 1953–1954, and 1975–1977.⁶² These have impact on local infrastructure, for example:

- (1) River and pluvial flooding led in 2020 and 2021 in Sligo County led to damage to residential properties, closure of businesses (Mowlam Nursing Home) and transport networks, and disruption of public services. Projected increases in storms will expose Sligo to more riverine and pluvial flooding events.
- (2) Sea-level rise of up to 3mm since 1990 as well as coastal flooding and erosion pose a significant risk to the northwest of Ireland, in terms of disruption of coastal habitats, infrastructure, and transport networks. This will increase with increasing projected sea-level rise.
- (3) Severe windstorms already affect energy supply and transportation networks in Sligo, Donegal and Leitrim. These are projected to increase in frequency and intensity. Assets in Sligo are under major threat from windstorms, according to a KPMG report.
- (4) Heatwaves and droughts have caused restricted water supply, damage to roads (for example, N15 in 2018), and increased demand in recreational areas in Sligo County.
- (5) Four of the wettest years on record since 1954, have occurred in Sligo since 2000. Storm Clara caused 63mm of precipitation in one day, causing a major landslide in Castlebaldwin and flooding on the R293.

These challenges could be addressed through effective adaptation strategies, based in efficient data-monitoring and projections, cost-benefit analysis of ecosystem-based approaches, stakeholder engagement with adaptation strategies, an effective storm surge model coupled with a network of low-cost sensing technologies and more.

Nature Based Solutions.

Recent research has found that nature-based solutions can not only increase climate resilience to natural hazards, specifically coastal natural hazards such as storms, floods, coastal erosion, sea-level rise, but also offer co-benefits for social, economic, cultural and environmental well-being. Nature-based solutions can help engage the community in climate adaptation actions, and thus enable community empowerment (Tiwari et al., 2022).⁶³

In the Northwest region, the Coastal City Living Lab (CCLL) was established as part of an EU funded SCORE project to effectively monitor climate risks through smart technology such as sensors, satellite imaging, digital twin, early warning systems, etc and implement climate adaptation strategies involving ecosystem-based adaptation, citizen science, and stakeholder engagement. Results of the project have been incorporated in the CARO (Climate Action Regional Office) Report published in February 2022. The highest ranked ecosystem-based adaptation approaches in the region were wetland restoration, peatland restoration, and reforestation (through multi-criteria analysis voting done by stakeholders part of the CCLL).⁶⁴

However, climate change is challenging for Irish agriculture both in the context of greenhouse gas emissions and the need for adaptation of farming practices to be more resilient to the impacts of climate change.⁶⁵ Cattle rearing farms in the northern and western region tend to be smaller and

⁶² Paul O'Connor et al., "Relating Drought Indices to Impacts Reported in Newspaper Articles," *International Journal of Climatology* 43, no. 4 (2023).

⁶³ Ananya Tiwari et al., "Building Climate Resilience in Coastal City Living Labs Using Ecosystem-Based Adaptation: A Systematic Review," *Sustainability* 14, no. 17 (2022).

⁶⁴ Ibid. See further <https://www.caro.ie/>

⁶⁵ The Citizens' Assembly, "Report of the Citizens' Assembly on Biodiversity Loss." 7.

less intensively stocked. Only 16% operate on very good soils, compared to half of the farms across the other regions.⁶⁶

A further concern is the conflict that arises between windfarm developments and blanket bog habitat (a key climate mitigation tool). County Donegal is particularly impacted by this development, experiencing the greatest extent of this conflict.⁶⁷ We would recommend further engagement with the Aarhus Convention so that Irish Government continues to promote public participation in decision-making within our region, and provide access to justice, including judicial and non-judicial mechanisms on environmental matters that have a regional impact.⁶⁸

We recommend the Committee asks the Irish Government:

- a) How is the government prioritizing regional considerations tailored to the unique biodiversity and climate change impacts in the Northwest of Ireland?
- b) How will Government future planning to reduce carbon emissions includes measures to guarantee adequate food provision and support the livelihoods of farmers?

Article 13 - Right to education

Barriers to Education

The OECD (2023) has highlighted that ‘the lack of regional and local competences with respect to higher education institutions create a roadblock for education-based attraction initiatives’.⁶⁹ The Report has observed that ‘there is significant room for increased funding and devolution of responsibilities to the recently established Technological Universities’.⁷⁰ To address the issues of talent acquisition and retention, and devolution of research responsibilities, the OECD recommend the Government ‘invest substantially in regional universities to develop internationalization programs, R&D initiatives and in international student attraction and retention’.⁷¹ However, there are other notable concerns we wish to highlight.

A recent Spatial & Socio-Economic Profile of Higher Education Institutions (2019) revealed some notable statistics about access to higher education in the Northwest Region, and the profile of students who attend.⁷² The Northwest region has a high proportion of young people entering third level as first-in-family university students, which includes both university and apprenticeship courses. Enrolment data reveals that the further to the Northwest the higher education institution is, the greater likelihood students come from disadvantaged communities, and will travel approximately double the national average to attend college.⁷³ For example, 19% of students attending in Sligo ATU Campus are from disadvantaged backgrounds, with a mean distance travelled for college of 81km. Furthermore, 24% of students attending at Letterkenny ATU

⁶⁶ Emma Dillon et al., "Teagasc National Farm Survey. 2018 Results," in Agricultural Economics and Farm Surveys Department, Rural Economy Development Programme (Dublin, 2018).

⁶⁷ Guaduneth Chico et al., "The Extent of Windfarm Infrastructures on Recognised European Blanket Bogs," *Scientific Reports* 13, no. 1 (2023). See also Committee on Economic Social and Cultural Rights, "General Comment No. 26 (2022) on Land and Economic, Social and Cultural Rights," (Geneva: United Nations, 24 January, 2023). §40.

⁶⁸ United Nations, "Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention)," Treaty Series, (Geneva: United Nations, 25 June 1998).

⁶⁹ OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework." 27.

⁷⁰ Ibid. 27.

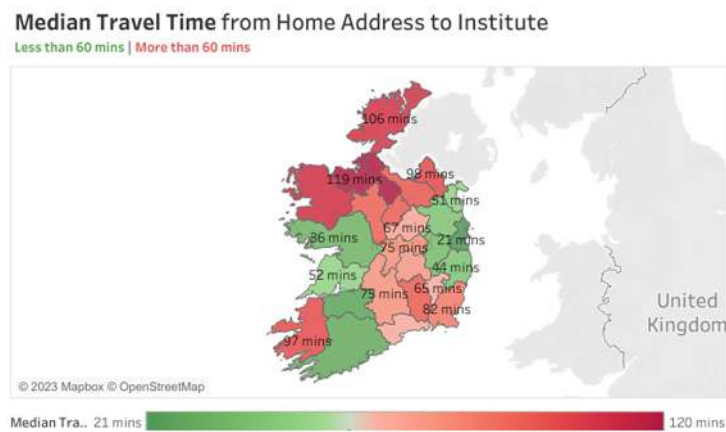
⁷¹ Ibid. 53, 56.

⁷² Higher Education Authority, "Higher Education Spatial & Socio-Economic Profile 2017/18,," (Dublin, October 2019).

⁷³ Ibid.

Campus are from disadvantaged backgrounds with mean distance travelled for college as 82km. In Galway-Mayo ATU Campus 12% of students are disadvantaged, with the mean distanced travelled for college is 90km. These are the highest nationally and are approximately double in terms of disadvantage and distance travelled to college that the national average.⁷⁴ In fact, transport infrastructure to facilitate students attending university has been highlighted by Student Union bodies in the region, and this is verified by available data. Furthermore, the OECD (2023) have commented that transport 'is one of the most urgent development priorities across the Irish regions'.⁷⁵

In particular, the issue of transportation for students is compounded by socio-economic factors that inhibit opportunities for further education as a means of exiting poverty. HEA Reports have consistently identified that access to higher education can improve outcomes for students, but regional factors remain influential on earning and mobility prospects for young people in this region.⁷⁶



Source: HEA (2020/21) Socio-Economic Profiles

Access to professional programmes, including for example, pharmacy, medicine, dentistry, are all frequently determined by social location and socio-economic status but are unavailable in the region. It is notable that professional programmes including medicine, business, finance and engineering have higher proportions of affluent students while agricultural, environmental, social work and childcare programmes have higher proportions of students from “disadvantaged” backgrounds.⁷⁷ Therefore, these regional disparities and geographical access to education has been a crucial consideration and influencer for many students and their families in deciding where and what to study. These determining factors reveal impacts on their outcomes, and the potential to exit disadvantaged circumstances. Regional investment in higher education to improve educational options, with regard to factors of disadvantage, including socio-economic and transport issues for students from rural and coastal communities in the Northwest region, is consistently highlighted in available research.⁷⁸ Furthermore, the European Commission has highlighted that legislation to reform and develop universities in the Northwest region has the

⁷⁴ Ibid.

⁷⁵ OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework." 53, 55.

⁷⁶ Higher Education Authority, "Higher Education Spatial & Socio-Economic Profile 2017/18,."42

⁷⁷ Ibid.

⁷⁸ OECD, "Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework." 53.

potential 'to improve the quality, efficiency and the innovation capacity of the higher education sector and to help regional innovation ecosystems that do not perform as well'.⁷⁹ Additionally, it has been recommended that access to education is essential for continued skills retention and development and inward investment in the region and to mitigate and reverse decline (NWRA, 2020).

We recommend the Committee asks the Irish Government:

- a) Detail the initiatives the Irish Government has developed to address socio-economic barriers in the Northwest region to access further education and reduce disparities in further education?
- b) What measures will the Irish Government undertake to address transportation issues for students accessing further education in the Northwest region?
- c) How will the Irish Government support first-in-family university and higher education students from rural and coastal communities to access higher education?

Article 15 – Cultural Rights

We wish to highlight a number of issues related to the Right to Culture, including the right to enjoy the benefits of scientific progress and its applications, the relationship between natural capital and the right to culture, and the Neolithic Passage Tomb Landscape in our region.

Connectivity and remote working

The European Commission has highlighted issues related to the distribution of access to connectivity where the Northern & Western region has only a moderately innovative ecosystem, even though its performance has been increasing.⁸⁰ This has led to a concern about the impact of just transition which may imply for many in rural areas who will be left behind by many 'challenges posed to employment and economic diversification stemming from this transition'.⁸¹

An additional concern when addressing connectivity is the availability of remote working, which will in our view encourage fairer regional development, including an effort to re-imagining life for rural and remote coastal communities and beyond large urban centres.⁸²

Natural and Social Capital and the Right to Culture

In the Northwest region we have a profound relationship with our land, lakes and as a coastal community to the ocean, which is integrated into our regional culture.⁸³ Our conception of capital must be 'broadened beyond physical capital (machines and infrastructure) to include human capital (education and skills), natural capital (clean air, natural resources) and social/institutional capital (culture and trust)'.⁸⁴ These additional forms of capital are deeply

⁷⁹ European Commission, "2022 Country Report – Ireland," 14

⁸⁰ Ibid. 54

⁸¹ Ibid. See also Committee on Economic Social and Cultural Rights, "General Comment No. 25 (2020) on Science and Economic, Social and Cultural Rights (Article 15 (1) (B), (2), (3) and (4) of the International Covenant on Economic, Social and Cultural Rights)," (Geneva: United Nations, 30 April 2020). § 17, § 86. The Committee stated, 'everyone should have the open opportunity to participate in scientific progress, without discrimination'.

⁸² European Commission, "2022 Country Report - Ireland,." See also Committee on Economic Social and Cultural Rights, "General Comment No. 25 (2020) on Science and Economic, Social and Cultural Rights (Article 15 (1) (B), (2), (3) and (4) of the International Covenant on Economic, Social and Cultural Rights)." § 36, 'Economic inequality hinders equal access to scientific education and to the benefits of scientific progress for low-income households and especially for persons living in poverty'.

⁸³ The Citizens' Assembly, "Report of the Citizens' Assembly on Biodiversity Loss." 91.

⁸⁴ Luke McGrath and Stephen Hynes, "Approaches to Accounting for Our Natural Capital: Applications across Ireland," *Biology and Environment: Proceedings of the Royal Irish Academy* 120B, no. 2 (2020).

connected into our self-understanding and identity in the Northwest region. The impact of climate change threatens to break the link we have between the natural environment and our rich regional and coastal culture. We believe that the natural and social capital of this region has shaped our human, social and religious culture including our music, dance, theatre, poetry, and various forms of artistic expression. Our natural and social capital in the Northwest region is part of the cultural value of this region.

We therefore encourage our Government to strive to ensure economic and environmental measure do not damage these forms of capital, and view them as fragile assets that belong to our nation. We are concern that environmental impacts particularly for our coastal communities who may face threats in the decades to come, and who may be left behind or be unheard by economic and environmental solutions. We have reflected advocacy by Small Island Nations, and echo their concerns about their vulnerability and forewarned future concerns regarding climate change to coastal communities.⁸⁵ We are concerned that there are risks for the loss of cultural and social heritage for coastal communities in our region in particular. We note that Ireland is a signatory of United Nations Framework Convention On Climate Change (UNFCCC), which specifically references concern for ‘the possible adverse effects of sea-level rise on islands and coastal areas’.⁸⁶ We emphasise that our government needs to respond to these issues as profound concerns for our culture in a changing environmental and economic landscape. In line with the UNFCCC, we encourage the gathering of research and insight on the impacts of climate change and economic transitions on rural and coastal communities cultural life, their sense of belonging, and the natural and social capital of the region, as various future risks are identified.⁸⁷

Northwest Region’s Neolithic Passage Tomb Landscape

The landscape of the Northwest region is in a location that is shaped by deep cultural, symbolic and religious significance that includes megalithic tombs, passage tombs constructed in stages, beginning in around 3,500 BC, and other artefacts are that are of regional, national and international significance. We welcome the fact that the Northwest regions neolithic passage tomb landscape of Co Sligo has been included on tentative listing in July 2022 for proposed World Heritage site status.⁸⁸

However, it is notable that the Special Rapporteur on Cultural Rights has observed that many world heritage sites are threatened by rising sea levels and other environmental threats and described this as a “threat multiplier” that magnified the risks to our heritage.⁸⁹ Several of the cultural heritage and archaeological sites are located near river systems and are particularly exposed to river flooding.⁹⁰ Consequently, numerous of Ireland’s cultural heritage and archaeological sites, which bear diverse traces of human activity, are at risk of damage and/or loss due to the impacts of accelerated climate change.⁹¹ We call on the Government to increase

⁸⁵ UN News, "Sink or Swim: Can Island States Survive the Climate Crisis?," (New York: UN News, 31 July 2021). See also UNFCCC, "Enhancing Resilience of Oceans, Coastal Areas and Ecosystems through Collaborative Partnerships.," in *Nairobi Work Programme*. (Bonn 2021).

⁸⁶ United Nations, "United Nations Framework Convention on Climate Change," *UN Treaty Series* 1771 (1992). Ireland ratified this Convention on 19th July 1994. See the Preamble, and Article 4.1 (d)(e), and Article 4. 8 (b).

⁸⁷ *Ibid*. See Article 5. Research and Systematic Observation.

⁸⁸ RTE News, "Three Irish Sites Closer to Receiving Unesco World Heritage Status," (Dublin: RTE News, 2022). See also KPMG, "Sligo 2030 One Voice One Vision," ed. KPMG (Dublin, Ireland2023). 26.

⁸⁹ Special Rapporteur on Cultural Rights (A/HRC/40/53, para. 70).

⁹⁰ Sligo County Council Climate Change Risk Assessment, 2023

⁹¹ Jones, J.E., Pollard, E., Craven, K. et al. Understanding Pressures to Archaeological Heritage in the Face of Climate Change: An Integrated Approach to Coastal-Zone Assessments in Ireland. *Hist Arch* 57, 566–588 (2023).

<https://doi.org/10.1007/s41636-023-00421-3>

their efforts to preserve our national heritage in the Northwest region, and secure their locations for future generations. We also express our concern over the vandalism of the Carrowkeel site in Co. Sligo recently and are concerned about the protection of our regional heritage, which is of great value to the region, and holds such international significance.⁹² We call on our government to engage with local communities, provide further long-term strategic dialogue and investment, maintain their support, and increase their efforts to secure World Heritage status for these regional and international treasures.

We recommend the Committee asks the Irish Government:

- a) What steps will the government take to secure the natural capital of our region, to ensure this is included in national priorities, that respects and protects our regional, cultural and environmental value and contribution to our country?
- b) How will the state guarantee the future of our regional cultural heritage in light of the effects of climate change on our cultural heritage?

⁹² Sarah Slater, "Shocking' Vandalism of Megalithic Tomb Site in Co Sligo Being Investigated," *The Irish Times*, Monday October 16 2023.

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