



RESPONSE TO DRAFT NATIONAL REFORM PROGRAMME 2020

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Introduction

The Irish Congress of Trade Unions (ICTU) is the trade union confederation for trade unions in the Republic of Ireland and in Northern Ireland, representing trade unions with over 520,000 members in the Republic of Ireland and approximately 200,000 in Northern Ireland.

This is our response to the government's draft National Reform Programme (NRP), received on 8 April 2020, with a request for comments by 9 April.

It is necessary to begin by addressing the implications of COVID-19 for this year's European Semester *process*.

The European Semester process 2020 and COVID-19

The Irish Congress of Trade Unions is fully committed to playing our part in ensuring that Ireland prevails over COVID-19. We acknowledge the unprecedented challenge that COVID-19 poses for the government and for public administration, including for officials who would normally be involved in the European Semester process but who this year, may be focusing on COVID-19. In view of this evolving crisis, the government will be aware that the European Trade Union Congress (ETUC), on behalf of ICTU and other trade union confederations across Europe, had called on the European Commission in late March to postpone the normal timetable of the European Semester process (ETUC, 2020). Unfortunately, the Commission declined to take up this suggestion.

We do regret however that this year's draft NRP was sent later than usual and with a request for feedback within just over 24 hours. This extremely tight deadline has made it exceptionally difficult to give the draft NRP proper consideration and to comment. This response nevertheless reflects the comments received from affiliated unions within a requested timeframe that enables us to try as best we can to meet the requested deadline for comment. This shorter than usual timeframe also underlines the importance of improving the involvement of stakeholders during the entire European Semester process. As the government will recall, the country report Ireland 2019 stated (p.37) that the social partners 'are rarely involved and consulted in relation to the European Semester process by the government'. It will also recall that in our letter of 30 January 2020, ICTU had asked the government to forward to us the Commission's draft country report 2020, which we understood it had received in late January, i.e. before its finalisation and its publication in late February. Regrettably, this request was refused. We do understand however that the governments of a number of other member states did accede to similar requests from their trade union confederations. The involvement of the stakeholders may not have suffered to the extent it has had there been a 'better starting point'. We would therefore ask the government to give a genuine consideration to how better to involve stakeholders in future years, including by committing to forwarding draft documentation, such as the draft country report and the draft NRP, at earlier stages than has done so far. ICTU is willing to work with government and other stakeholders to improve this involvement.

General comments on the draft NRP

ICTU is strongly of the view that the absence of the sections on COVID-19 and on the macroeconomic context and scenario is entirely unsatisfactory, undermines this consultation process and renders the draft NRP as presented largely irrelevant and meaningless. We would expect to be consulted again when the draft NRP is completed, and to be given enough time to consider it and to respond.

Furthermore, we would query the justification for limiting the NRP to ‘existing policies’. The draft NRP states (p.2) that because the process of forming a new government remains underway, the National Reform Programme 2020 must be based on a “no change policy scenario”, meaning that ‘only existing policies in place and agreed by government are detailed’, and that ‘prospective future policy developments are not addressed, pending the formation of a new government. We would contrast this approach with that set out in the 2016 National Reform Programme which was also presented during an interregnum between a general election (held on 26 February 2016) and the election of a Taoiseach (on 6 May 2016). There was no apparent intention in that year to limit the NRP to ‘no change policy scenario’.

The conservative approach taken this year is all the more regrettable given that due to Covid-19, many existing policies have been revised and that many measures, some of which were previously considered impossible or unfeasible have been introduced in a matter of days and weeks. As the draft NRP states (p.2), COVID-19 ‘will clearly have a substantial and lasting impact across a wide range of policy areas’, it is also regrettable to ask stakeholders to comment on a draft that leaves entirely blank the section on Ireland’s response to COVID-19, particularly as details on many of the measures taken have already been widely circulated.¹

COVID-19 also underlines the importance of ensuring proper access to services that though provided privately, are recognised as essential in the current crisis (e.g. access to a bank or post office etc.). This clearly has implications for guaranteeing universal access to such services for all citizens and people living in Ireland.

Finally, we note that the draft refers throughout to the COVID-19 *emergency*. We believe it is more appropriate and necessary to consider COVID-19 as a *crisis* with profound long-term social, economic and political implications. COVID-19 will require a complete reconsideration and reorientation of many areas of policy and of how policy is made. ICTU will be bringing forward appropriate proposals over the coming weeks and months to contribute to this debate.

Social dialogue and collective bargaining

It is extremely disappointing that this year’s draft NRP, like last year’s, does not address the issue of social dialogue and collective bargaining. The draft in fact attempts to characterise the various bodies that include trade unions and other civil society actors (i.e. as set out in

¹ For example, to the European Commission’s Economic and Financial Affairs DG. See: ‘Policy measures taken against the spread and impact of the coronavirus – 6 April 2020’
https://ec.europa.eu/info/sites/info/files/coronavirus-policy-measures-6-april_en_1.pdf

section 6) as representing genuine social dialogue. This entirely fails to respect the commitments that Ireland has undertaken through the European Pillar of Social Rights and the European Council's new strategic agenda 2019-2024. There is no apparent response to the country report 2020's observation (p.42) that there is scope to improve social dialogue and collective bargaining in Ireland.² Since this issue was discussed at length in our response to the country report 2020 and in view of the short timeframe within which we have been given to respond, we will simply state that this is an **extremely serious omission** as far as ICTU is concerned, and causes us to question the government's commitment and interest in this whole process. The point also needs to be made here that in the limited time we have had to consider the draft NRP, it is difficult to avoid the conclusion that nothing of major significance from our response to the country report 2020 has been included.

The remainder of this response deals with issues in the order in which they are considered in the draft NRP that ICTU wishes to comment on at this stage, based on policy positions adopted by our Executive.³ These comments should be read alongside our response to the country report 2020, previously sent to government.

Macro-economic Context and Scenario

As stated above, it is extremely regrettable that stakeholders are asked to comment on a draft that leaves entirely blank the section on the macro-economic context and scenario.

This section should acknowledge the crucial importance of solidarity in relation to the costs associated with responding to Covid-19 and in relation to a new social contract for the future of the euro and the EU itself.

Main policy responses to main economic challenges and CSRs

Brexit

The draft refers (p.6) to the government continuing to work to ensure that Ireland is prepared for the end of the transition period and that this includes 'strengthening the resilience of the economy and maximising opportunities for *businesses* throughout Ireland.'

We see little or no recognition here of the importance of strengthening the resilience of *workers* in the face of the implications of the UK leaving the EU. This continues to fall short

² The Commission's draft Joint Employment Report (COM(2019) 653 final) defines (p.110) social dialogue as comprising 'all types of negotiations, consultations or simply information sharing between, or among, representatives of governments, employers' and workers' organisations, on issues of common interest relating to economic and social policy'. The draft report was finalised by the Council's Employment Committee on 10 March and has since been forwarded to the Council for formal adoption.

³ The fact that this response does not comment on all parts of the draft NRP should not be taken as acquiescence on content.

of recent OECD policy conclusions and recommendation to member countries, Ireland included. For one, the OECD's 2018 *Jobs Strategy* states that:

[the] 'best way of promoting an inclusive labour market is by addressing problems *before they arise*. This means that a shift in emphasis is required *from remedial to preventive policies*. This enables workers to avoid many of the social and financial costs associated with labour market risks (such as unemployment, sickness and disability), (OECD:2018:16).'⁴ (emphasis added)

While the OECD's 2019 *Skills Strategy* in turn recognises the importance of involving the social partners in such work transitions:

"The reallocation of displaced workers between firms, industries and regions should be supported by early intervention and re-employment measures, including counselling and reskilling. Since successful intervention depends on long lead times, *active engagement with social partners* and the development and use of skills anticipation exercises are needed'.

The draft NRP also states (p.2) that 'the preparedness measures undertaken to date as part of No Deal contingency planning remain valuable'. The government will recall that ICTU made proposals to introduce a European-type short-time work scheme based on best practice schemes in place in other European countries involving genuine social dialogue with the social partners (see ICTU, 2019). It appears to us that while these proposals were being given some consideration by the government when there was a real possibility of a no-deal Brexit, i.e. in September/October 2019, once that possibility abated, these proposals were left aside.

Climate Action

It is disappointing that the draft NRP does not effectively address the point made in the country report 2020 (p.61) that, 'recent trends in emissions and their sectoral composition point to *insufficient mitigation efforts made so far and major challenges ahead*.' The only apparent discussion of sectoral targets in the draft NRP is the reference in the summary of the June 2019 Climate Action Plan (p.8) to 'establishing in law a system of five-year carbon budgets and sectoral targets, with penalties for non-delivery'. While the Action Plan does refer (p.39) to the proposed new Climate Action Act, intended to make the adoption of carbon budgets a 'legal requirement', it should be noted that the Action Plan also states that the Climate Action Act would 'require the Government to *set a decarbonisation target range for each sector, with the Minister with primary responsibility for the sector being accountable for delivering the relevant actions to meet the sectoral target*'. It does not necessarily follow that sectoral targets would be 'established in law' with penalties for non-delivery as suggested by

⁴ The OECD's 'dimensions' of labour market inclusiveness are: 'i) the share of the working-age population with disposable income substantially below that of a typical working-age person; ii) the gender gap in labour income per capita; and iii) the gap in employment rates between prime-age men and selected disadvantaged groups – youth, older workers, mothers with children, people with disabilities and migrants (i.e. the foreign-born)'. Source: OECD (2018) *Good Jobs for All in a Changing World of Work THE OECD JOBS STRATEGY*, p.58

the draft NRP. Nor is there any indication as to when the Climate Action Act will be proposed, as would be expected for an 'existing policy', as discussed in the draft NRP (p.2).

Furthermore, the draft NRP does not address the point in the county report (p.67) that 'a vision for a 'carbon neutral' agriculture and land sectors still needs to be spelled out'. The draft NRP apparently only refers back (i.e. pages 6-7 & 41-42) to the June 2019 Climate Action Plan as including 'initiatives' in every relevant sector (agriculture included).

It is regrettable that the discussion of a Just Transition in the draft NRP does not acknowledge the importance of social dialogue with the social partners and other stakeholders in the decarbonisation of the economy, across *all* sectors. It should be recalled that the 2015 Paris Agreement called precisely for such a social dialogue based on International Labour Organisation guidelines. The draft NRP discusses the Commission's January 2020 proposal for a Just Transition Fund, but it should be pointed out that that this proposal does acknowledge the need for social dialogue,⁵ as does the Commission's January 2020 Communication, *A Strong Social Europe for Just Transitions*,⁶ issued at the same time, as well as in NESCC's March 2020 report, *Addressing Employment Vulnerability as Part of a Just Transition in Ireland*.⁷ There is no acknowledgement in the draft NRP of the role of social dialogue, trade unions and the participation of workers in the development of a response to climate chaos. Nor is there any consideration of the need to protect workers' incomes in the event of climate change-related job losses, to the participation of employees in strategic planning at firm level (in particular, in public enterprises), or to a partnership approach at national, regional or local, involving workers.

In the Bord na Móna case, the continuing failure to plan and manage the process in accordance with the principles of a Just Transition have created fear, uncertainty and anxiety among the company's remaining workforce. There have been only piecemeal efforts on reskilling and retraining to date, no plans for replacement jobs, industries and investment in the region as well as insufficient funding. Through inaction, the government and the company management have squandered the goodwill of workers and local communities, who had signed up to a 2016 plan for a gradual, managed wind down over a 10-year period. While the transition has been accelerated rapidly, no corresponding measures or supports have been put in place. The Bord na Móna example contrasts sharply with more successful examples of transitions in other countries.

⁵ For example, the draft Just Transition Fund regulation states (p.7) that under the EU coal regions in transition initiative, 'multi-stakeholder dialogue and knowledge sharing *proved to be essential* to ensure collective progress, transparency and mobilisation of the most effective means for addressing the socioeconomic impacts of the transition.

⁶ This states (p.13) that the 'key to success often lies in the hands of national, regional and local authorities, as well as social partners and relevant stakeholders at all levels, working together with the EU level to make it work.'

⁷ Which describes (p.56) social dialogue as 'an *effective* mechanism for fostering trust and adopting a problem-solving approach to transition'.

Future Jobs Ireland

There is no apparent response in the draft NRP to the country report's call (p.38) for an integrated strategy to promote equal opportunities for all; to its comments (p.37) concerning the emergence of a higher gender pay gap over the past decade, which will require the adoption of gender pay legislation amongst other measures. The section on progress towards achieving the UN Sustainable Development Goals (see below also) does state that 'specific challenges exist' in relation to a number of areas including 'mainstreaming a gender perspective into policy' but does not follow through on this. These inequalities exist due to a range of barriers that exist to their full participation in the workplace – including a lack of affordable childcare and an absence of the real flexibility in many organisations that would enable women to realise their professional potential. The Citizens Assembly, to which ICTU is contributing, will bring forward recommendations in this area during 2020 which the government will need to take on board in moving forward on gender equality.

Nor is there any apparent response to the country report's comments regarding the quality of platform work in Ireland (p.38); and on the employment status of platform workers (p.41). Nor is there any apparent consideration of the issue of low pay, which was at least acknowledged albeit inadequately in the country report 2020, nor of the problem of precarious work, which was raised in the country report 2019, though not in this year's report.

The only apparent consideration of the issue of quality jobs and quality employment is the statement that nine Regional Enterprise Plans, that were 'developed by regional stakeholders' and launched 'in early 2019' covering the period 'to 2020', aim to 'strengthen the regional enterprise ecosystem while driving sustainable and quality job creation in the regions'. It should be pointed out that these plans consider quality jobs only as jobs that 'ensure a good living standard for all'. We also need to make the point that workers and unions were not involved in the development of these plans.

The draft NRP only appears to consider decent work in the context of the country report's Annex E, on progress towards the Sustainable Development Goals. Even so, it does not appear to have taken any account of the points ICTU made in our response to the country report 2020 regarding the Commission's limited consideration of decent work (i.e. only considering indicators on the number of workers killed through accidents at work and the 'in-work at-risk-of-poverty rate').

Nor is it possible to claim (p.57) that the country report's findings in relation to decent work are 'consistent with the results of Ireland's 2018 VNR which highlighted that Ireland was performing well on SGD8: Decent Work and Economic Growth'. The 2018 Voluntary National Review points out that the 'relevant national policy' for SDG 8.5⁸ is the Action Plan for Jobs, describing it as a 'whole-of-Government initiative under which Government Departments and Agencies work to support job *creation*.' There was in fact *no* consideration of decent work in the *Action Plan for Jobs 2018*, nor is it addressed in *Future Jobs Ireland 2019*. (See also section on the Sustainable Development Goals below).

⁸ To achieve by 2030 'full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.'

Though not addressed in the draft NRP, Future Jobs Ireland 2019 does refer (p. i) to promoting remote and flexible working. In this regard, it is vital to ensure employee-led flexibility at work and flexible working options that work for all, including legislation guaranteeing the right to disconnect.

The employment of people with disabilities is not apparently discussed in the draft NRP, which does not respond to the country report's statement that the impact of the Comprehensive Employment Strategy for People with Disabilities", launched in 2015, 'is still to be seen'.

Similar to the points made in our response to the country report 2020 regarding social dialogue and collective bargaining and made above in relation to climate change, there no consideration in the section on Future Jobs Ireland of the role of social dialogue, trade unions and worker participation in responding to the challenges of technological change, automation, workplace productivity, and demographics, and the impact of these issues on employment. This is all the more inexplicable given that a stated thrust of Future Jobs Ireland is to shift towards the creation of 'quality' and 'sustainable' jobs. This not only marginalises a major stakeholder but also undermines overall strategy. While considerable attention is paid to productivity in the domestic enterprise base (SMEs), there is no consideration of worker participation, which has been shown to boost productivity. It is difficult to avoid the conclusion that the exclusion of labour, workers and the trade union movement from participation in strategy development, monitoring and implementation is informed not by a pragmatic decision but by ideological inclination.

Childcare

We regret that the draft NRP continues in the same vein as the country report 2020 in referring to affordable *and* quality childcare. As stated in our response to the country report, this is a retrograde step compared to the 2018/2019 country specific recommendations to Ireland, which emphasised affordable quality childcare. It also falls short of the European Pillar of Social Rights which through principle 11 provides that 'children have the right to affordable early childhood education and care of good quality.'

The draft NRP does not address the issue of the need to improve the terms and conditions of early childhood care and education workers, not just for the workers themselves but also in order to ensure the provision of quality services to children.

Childcare in Ireland is facing a three-fold crisis: affordability, low-pay and sustainability (due to its inability to recruit and retain staff). The *National Childcare Scheme* relies on a means-tested, demand-side subsidy which will exclude most households (from the subsidy), while fuelling inflation in prices (due to the subsidisation of demand). Childcare in Ireland is not viewed as a public service; rather, it is treated as a market commodity. The use of market-based strategies is reflective of a wider approach to economic and social policy and a continued failure to understand the nature of public services. Until this is addressed the crisis in the childcare sector will continue.

Housing

The slightly self-praising tone of the draft NRP, i.e. the references (p.14) to ‘exceeding’ delivery targets in 2016-2018 and probably again in 2019, sidesteps the implicit criticism (p.72) of the country report that questions the *effectiveness* of policy measures to increase the supply of social housing. There is no apparent response to the country report’s observation that ‘if implementation continues according to plans, Rebuilding Ireland will provide social housing to [just] over 73% of households on the current waiting list’.

The draft NRP does not address the gap between current levels of supply and equilibrium demand – the 21,241 new dwelling completions in 2019 is just over half of long-term equilibrium demand, while the focus on acquisitions and leasing sidesteps the fact that these do not increase overall stock, and have been questioned by the Department of Public Expenditure and Reform itself, as outlined in our response to the country report.

The simple fact is that Rebuilding Ireland is not working. Three years after its publication, there is no credible agency, expert or academic who believes the plan has the faintest hope of delivering a resolution to the current housing emergency. As stated in our response to the country report, the recent general election saw voters deliver an emphatic rejection to government policy in this field. The government needs to embark on a major programme of public housing construction on public land and put in place a new legal right to housing to underpin all future policy in this area.

Rising homelessness, rising private sector rents, and unaffordable house prices all point to manifest shortcomings in policy. As outlined above in relation to the childcare crisis, these are due to a continuing preference for market-based solutions, driven by private sector interests. Subsidies to landlords in the form of the Housing Assistance Payment, which were criticised in the country report (p.46) remain at the core of government policy in the private rental sector, while public land is being sold off to private developers in order to provide ‘affordable’ housing. The continued bias towards market-based ‘solutions’ undermines the goal of increasing social housing supply and housing affordability.

It is deeply ironic that it has taken the COVID-19 crisis to lead government to enact critical measures in the housing market, such as a rent freeze, and a halt to evictions, that it hitherto claimed were unconstitutional. These measures should not be abandoned once the current crisis ends.

Finally, we do acknowledge that the draft NRP does address the issue of cost-rental, albeit in the context of the limited pilot projects currently being developed in Dublin. In this regard, we would again refer to NERI’s comprehensive policy proposals to introduce cost-rental in Ireland (Healy and Goldrick-Kelly, 2017).

Public finances including CSR1

The draft NRP refers to the government’s intention to use NAMA receipts to pay down debt. Clearly, these receipts as well as the country’s cash reserves and the Rainy Day Fund etc. should be used to meet the enormous social and economic challenges posed by COVID-19.

ICTU also believes that a new Commission on Taxation should be established to come forward with ways to eliminate tax expenditures and to broaden the tax base.

With regard to health, it is to be regretted that stakeholders were asked to comment on a draft NRP that does not address the impact of COVID-19, nor its implications for current policy initiatives.

Furthermore, the government will appreciate that due to the current crisis and to the very short timeframe for comments, some affiliated unions with members working in the health sector have been unable to comment on the draft NRP at this point in time. For this reason, ICTU underlines the importance of being re-consulted when the full draft NRP is finalised in order to give these unions who represent essential workers an opportunity to express their views.

With regard to pensions, the ending of the State Pension (Transition) in 2014 and the planned increase in the qualifying age for the State Pension (Contributory) from 66 today to 67 in January 2021 and to 68 in 2028 is a matter of grave concern to ICTU. This amounts to the biggest ever cut to the social safety net for working people. ICTU has been very vocal bringing public awareness to this injustice, raising it repeatedly in regular meetings with government since 2011 when the Pension Act which provides for the changes came into effect. We have called for the Transition Pension to be returned and a reversal in the planned increases in all of our pre-Budget submissions since, and raise the issue repeatedly in the media. The planned increase in the pension was one of the main issues in the recent general election with most parties pledging to re-examine or reverse the pension age increase.

[Upskilling, access to childcare, including CSR 2](#)

ICTU welcomes the fact that, according to the country report 2020 (p.42), Ireland's education system delivers one of the lowest shares of 'low-performers' among students from disadvantaged backgrounds (21% versus 35% in the EU) and among students with a migrant background (14% versus 35% in the EU).

ICTU welcomes the fact that the rate of early-school leavers from education and training was reduced further to 5% in 2018, well below Ireland's Europe 2020 target of 8%. However, certain groups including travellers still face higher rates of early school leaving, and while the early leaving rate gap between young people with and without disabilities has narrowed, from nearly 23% in 2016 to 18% in 2017. We acknowledge that some of these challenges are addressed in the draft NRP.

ICTU also welcomes the fact that the share of the population aged 3-34 that have completed tertiary or equivalent education (56% in 2018) is well above the EU average (40%) but we do note that it is still below Ireland's Europe 2020 national target (60%). The draft NRP does not appear to respond to the country's report's comments (p.42) that potential funding constraints may act as a barrier for higher quality education and that no formal proposals to reform the funding model for higher education have yet been put forward.

ICTU has advocated and supported the expansion of the apprenticeship system over recent years. The Action Plan to Expand Apprenticeship and Traineeship in Ireland 2016-2020 aims to increase apprenticeship places (from 12,000 to 31,000) and apprenticeship programmes (from 27 to more than 70) by 2020. We note however that the draft NRP indicates (p.26) that there was a total of 6,177 registrations in 2019. While this was an increase of over 61% since 2016, it does appear to cast doubt on progress towards the target for 2020.

While public investment in education has increased over recent years, up 7% between 2018 and 2019, as pointed out in our response to the country report 2020, Ireland spends well below the *per-pupil* norm for advanced high-income economies. The country report stated (p.54) that public capital investment, including in education, is on an upward path, though from low levels, and that it will take a considerable effort to address the investment gaps that have accrued over the sustained period of low investment (2011-2017). It also referred (p.56) to the need for [increased] investments in education, particularly linked to pupil-to-teacher ratio (primary education) and development of critical thinking.

(Childcare discussed above).

[Climate, Future Jobs Ireland, Irish SMEs, including CSR 3](#)
(See relevant sections above)

[Progress towards UN Sustainable Development Goals](#)

ICTU believes that a comprehensive assessment of Ireland's progress in achieving the Sustainable Development Goals is set out in Social Justice Ireland's Measuring Progress: The Sustainable Progress Index 2020 (Social Justice Ireland, 2020).

In this report, Ireland's overall SDG performance is ranked 13th out of the EU-28, with an index score of 68.2. It concludes that Ireland faces 'challenges' in 6 SDGs, 'significant challenges' in 7, and 4 'major challenges', including identifying that Ireland has "challenges remaining" for Goal 8 on decent work (also discussed above under Future Jobs). We would highlight the following findings in particular.

With regard to SDG 4 (quality education), Ireland is ranked in 2nd place overall.

With regard to SDG 5 (gender equality), scores for the gender pay gap and the gender employment gap put Ireland in the middle ranking, below the EU average, and Ireland is placed in 10th place overall on SDG 5.

With regard to SDG 8 (Decent Work and Economic Growth), in order to capture more components, including the theme of 'decent work', the Sustainable Progress Index includes four additional indicators: the employment rate, the NEET rate, accidents at work, and average wages, and Ireland is ranked in 8th place overall on SDG 8.

With regard to SDG 10 (reduced inequalities), Ireland is ranked 9th.

ICTU strongly agrees with the conclusions of the Sustainable Progress Index 2020 that an effective Sustainable Development Framework must be integrated into economic policy, including into the European Semester process, as initiated this year.

EU Funds

It is disappointing that the draft NRP only considers the European Pillar of Social Rights under the heading of 'EU funds'. This fails to live up to the commitments that the Government has undertaken under this initiative, as outlined in our response to the country report 2020, and leads us to question its commitment to implementing the Pillar of Social Rights.

Institutional Issues and the role of stakeholders

(See section on social dialogue and collective bargaining above).

Conclusion

ICTU is will to engage on any of the above with government prior to the publication of the final NRP and with the Commission prior to the publication of the draft Country Specific Recommendations in May.

Despite the requested timetable, and the currently extremely challenging circumstances, we would appreciate government making every possible effort to ensure that ICTU and other civil society organisations have can make a meaningful contribution to this year's process.

Patricia King

General-Secretary of the Irish Congress of Trade Unions

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