A TEST OF THE EU'S INTEGRITY TOWARDS THE 2030 AGENDA:

THE STATUS OF POLICY COHERENCE FOR SUSTAINABLE DEVELOPMENT

CONCORD
European NGO confederation for relief and development

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We are the main interlocutor with the EU institutions on development policy. We are a member-led organisation, which means that the Confederation's strategic direction is determined by our members.

VISION
We envision a world in which people live free from poverty and exploitation. This must be achieved by a people-led transformative agenda based on social justice and gender equality, one that respects diversity and the limits of what our planet can sustain.

MISSION
We work together to ensure that EU policies promote sustainable economic, social and human development, that they address the root causes of poverty, and are based on human rights, gender equality, justice and democracy.

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INTRODUCTION

Thanks to the adoption of the United Nations 2030 Agenda for Sustainable Development (hereafter, the 2030 Agenda), the world now has a global framework for achieving sustainable development and equality for all. Both the principles enshrined in the 2030 Agenda and the Sustainable Development Goals (SDGs) themselves are universal, which means that all countries are expected to achieve them, not only at home but also without impacting negatively either on other countries or on future generations. The latter impacts are often the most neglected as, unfortunately all too often, national and EU policies do have negative repercussions on people's well-being and on the environment in third countries, especially in the Global South.

The 2030 Agenda has 17 Goals, 169 targets and 232 unique indicators. Using the 2030 Agenda indicators can seem quite straightforward, for example when measuring how gender equality or food security is progressing within the EU, but it is much harder to measure the impact (negative or positive) of our energy and food consumption on countries outside the EU. For example, in "going green", EU countries might opt for sources of energy that make them dependent on minerals from unsustainable mining sites (e.g. lithium to make batteries for electric cars). However, what is clear and measurable is that the ecological or material footprint of the EU is far higher than its global "fair share", which indicates that it is taking too many natural resources from elsewhere. Furthermore, Europe often pays too low a price for the commodity or labour involved. This can affect exporting countries in their efforts to implement their SDG agenda, as it results in the exploitation of cheap labour, inequality, less productive land being available for these countries' own food security, the degradation of soils and ground water, deforestation and so on.

That is why Policy Coherence for Sustainable Development (PCSD) is so important and why it is crucial that it be high on every government's or institution's agenda at all levels of decision-making, and that the instruments and mechanisms to monitor progress be institutionalised. For CONCORD, the main objectives for PCSD are:

- ☑ **To foster synergies across policy areas and between sectors**
- ☑ **To ensure that today's policies do not undermine the well-being or sustainable development of future generations**
- ☑ **To identify and address trade-offs, or negative spillovers, both between domestic policies and in domestic policies that affect other countries**

PCSD is an underestimated – even ignored – but very crucial element in achieving the 2030 Agenda worldwide. The 2030 Agenda is by its very nature interlinked and integrated, so its objectives cannot be achieved in isolation. Actions on one objective can have positive or negative impacts in other areas. It is thus vital to respect the interlinkages between different sectors, and between internal and external dimensions. To look at policy-making through the lens of sustainable development requires a new form of governance: one that addresses the root causes of today's challenges and that focuses on a long-term vision and overall system change.

It is important to stress that the concept of Policy Coherence for Development (PCD) has been current in Europe for almost four decades. It is now rooted in Article 208 of the Lisbon Treaty (2009) and was reiterated in the European Consensus on Development (2017). CONCORD acknowledges that, as a result, PCD now gets considerable attention, both at EU level and in most EU Member States. Policy Coherence for Development means that the "EU shall take account of the objectives of development cooperation in the policies that it implements which are likely to affect developing countries". It requires

policies to be coherent with the objectives of a country's development policy, which in the EU and many Member States is narrowly defined as "poverty reduction".

The newer concept of Policy Coherence for Sustainable Development (PCSD) is more complex and comprehensive and *includes all national or EU (domestic) policies in the exercise of policy coherence* concerning sustainable development in the Global South. PCSD requires coherence between the social, environmental and economic dimensions of all policies and related governance issues. Monitoring PCSD calls for concrete objectives and strong multi-sectoral coordination, a means of implementation, a mandate to adjust policies to avoid incoherencies, and accountability mechanisms. It would therefore be appropriate for PCSD to be integrated into an overall sustainable development strategy involving sectoral plans (e.g. on climate, energy, ecological transition, a green deal, recovery plans, industrial policies, agriculture/the CAP, trade, foreign affairs and development cooperation, migration and military operations), and for targets to be clearly defined so that concrete results can be monitored.

Achieving PCSD also requires an institutional framework for effective stakeholder engagement beyond organisations whose focus is international cooperation. To reflect the breadth of the SDGs, communication and coordination beyond this sector should be encouraged, and with organisations targeting marginalised groups such as women and girls. Likewise, PCSD also requires more intersectoral strategising, an overarching systemic analysis and long-term, coherent political messaging.

This study pays special attention to the objective of addressing trade-offs or negative spillover effects of domestic policies in the EU or its Member States, on the Global South. This is not an easy task, but with the right insights, data, institutions and monitoring tools it is possible, and it would bring concrete benefits by supporting progress in achieving the 2030 Agenda around the world.

THE MAIN OBJECTIVES OF THIS STUDY ARE TO:

1. Encourage Member States and all the EU institutions and services to commit to, implement and report on PCSD by reinforcing or creating functioning mechanisms for it, and ensure that **the focus on partner countries in the Global South is not lost,** especially in times of COVID recovery.

2. Advocate for a balanced, comprehensive and integrated approach to sustainable development in EU policy-making (by taking all the dimensions into account) so that the social and environmental dimensions are not undermined by economic priorities or vested interests.

3. Create a positive narrative around PCSD by emphasising the great leverage PCSD can have for sustainable development and by showcasing transferable **promising practices.**

4. Create effective spaces for participation in PCSD discussions by **civil society organisations,** also ensuring relevant connections with local communities in the Global South.

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SDG 17 aims to strengthen the means of implementation and revitalise partnerships for sustainable development. This SDG sets many targets, such as increasing development aid and sustainable finance, increasing trade, capacity-building, policy and institutional coherence, multi-stakeholder partnerships and data monitoring. CONCORD's report looks only at target 17.14: "enhance policy coherence for sustainable development", together with indicator 17.14.1: "mechanisms in place to enhance policy coherence for sustainable development".

The indicator that the United Nations Environment Programme developed to monitor SDG target 17.14 is considered the most comprehensive, and has recently been added to the official set of indicators for the 2030 Agenda. It focuses on eight mechanisms that are key to ensuring policy coherence and which provide long-term leverage for PCSD.

A government would be expected to put in place the following mechanisms if it intended to achieve policy coherence for sustainable development:

1. Institutionalised political commitment[1]
2. Long-term considerations in decision-making
3. Inter-ministerial and cross-sectoral coordination
4. Participatory processes
5. Policy linkages
6. Alignment across government levels
7. Monitoring and reporting for policy coherence
8. Financing for policy coherence

The indicator is quite comprehensive in measuring internal policy coherence, covering as it does both vertical and horizontal levels of policy- and decision-making. But it has considerable shortcomings when it comes to measuring the policy coherence between domestic policies and external trade-offs. It may not easily detect, for instance, the (negative) effects that an agricultural policy in an EU country may have on food security in the Global South. In 2019, CONCORD already voiced its concerns in the *"Spotlight Report on Sustainability in Europe – Who is paying the bill? – (Negative) impacts of EU policies and practices in the world"*, in which it reviews a list of domestic EU policies and shows what negative effects they can have on the Global South.

Another of the indicator's weaknesses is that, while it requires a government to have mechanisms for PCSD in place, it does not measure how well those mechanisms actually function, or what outcomes they produce.

A WORD IN ADVANCE

To understand the results of the review, it is important to bear in mind that the origins of existing instruments for measuring PCSD may be quite different, which will impact on those used today.

Some countries use the Policy Coherence for Development (PCD) instrument, and some of them, in turn, aim to broaden it to PCSD. Other countries are establishing a new structure for PCSD in their governance system, now that they have signed up to the 2030 Agenda. Still other countries are integrating PCSD into their existing mechanisms which originated from commitments they made in Rio de Janeiro in 1992, after the United Nations Conference on Environment and Development (UNCED), when Agenda 21 was agreed. It is noteworthy that those countries that began implementation in 1992 were expected to develop national plans and/or strategies for sustainable development. That in turn produced an overarching, integrated, long-term vision, and forced all ministries, public administrations and civil society groups to communicate across sectors and to find mutual points of leverage in order to achieve sustainable development. This often went hand-in-hand with the establishment of National Advisory Councils, in which all stakeholders participated, to guide and advise the ministries on reforming existing public policies. These elements have proven useful for implementing the 2030 Agenda, including SDG 17.14, on PCSD.

PCSD mechanisms thus have their origins in different places, which are not mutually exclusive:

1. a sustainable development focus (whether based on the Agenda 21 mechanisms or new ones for the 2030 Agenda) for detecting PCSD in line with SDG target 17.14, or
2. the PCD mechanism, with an ambition to evolve towards sustainable development (PCSD), or
3. a new mechanism for PCSD.

The following table summarises where the reviewed Member States are at in terms of their commitment to PC(S)D according to a number of factors which are key to making PCSD a reality. It is important to bear in mind that an overarching commitment to the SDGs implicitly entails a commitment to PCSD.

1 *Since political commitment is regarded as an endorsement at the highest level, and since it would not be a long-term commitment if it depended on any one political figure, or changed with every election cycle, we have interpreted this as being enshrined in law.*

Table 1: An overview of countries and of the three possible routes to achieving PCSD

Country	Commitment to the Sustainable Development Goals (SDGs)			Commitment to PCD			Commitment to PCSD		
	In law	Long-term plan or strategy	Coordination between	In law	Long-term plan or strategy	Coordination between	In law	Long-term plan or strategy	Coordination between
Austria	no	no	all ministries	yes	no	no	no	no	no
Belgium	yes	yes	all ministries	yes	yes	several ministries	no	yes	all ministries
Czech Republic	no	yes	all ministries	no	yes	all ministries	no	yes	all ministries
Germany	no	yes	all ministries	no	yes	all ministries	no	yes	all ministries
Italy	no	yes	several ministries	yes	no	several ministries	no	no	several ministries
Netherlands	no	no	all ministries	no	yes	all ministries	no	yes	all ministries
Slovenia	yes	yes	all ministries	No	yes	several ministries	no	no	no
Spain	no	yes	all ministries	Yes	yes	all ministries	no	yes	15 ministries
Sweden	yes	yes	all ministries	Yes	yes	all ministries	no	yes	all ministries

COUNTRY RESULTS PER MECHANISM UNDER SDG INDICATOR 17.14.1:

Institutionalisation of political commitment: Sweden, Belgium and Slovenia have enshrined their commitment to implementing sustainable development in law. Austria, Belgium, Italy, Spain and Sweden have commitments to policy coherence for development in their laws. Germany, the Netherlands and the Czech Republic do not. No country has committed explicitly to PCSD, which was the requirement for a more favourable review.

Reflection: A political commitment to Policy Coherence for Sustainable Development implies a governmental duty that goes beyond the period of a government's mandate. This means that it should be written into law, to avoid it having to be renegotiated by every legislature. Even if not enshrined in law, however, most countries do have some kind of political commitment to PCSD, usually mentioned in other existing processes on PCD or sustainable development in general. Far rarer is an explicit mention of preventing external trade-offs, in all national policies, from negatively affecting sustainable development in the Global South.

Long-term considerations in decision-making: Belgium, the Czech Republic, Germany, Slovenia, Spain and Sweden have a national plan or strategy for sustainable development, which incorporates PCD or PCSD. The Netherlands and Slovenia have an action plan for Policy Coherence for Development specifically. Belgium is working on a plan for PCD. Italy is working on a plan for PCSD. Austria has no strategy or action plan on PC(S)D.

Reflection: This mechanism is closely linked to the first one: once a government shows political commitment, it is also expected to develop a long-term plan with concrete actions, division of tasks, mandates and means of implementation for measuring PCSD. That also entails having goals, targets and a timeline to make it possible to evaluate and measure progress. This can be done either under an overall strategy or plan for sustainable development, or under specific plans for PCD or PCSD.

Inter-ministerial and cross-sectoral coordination: Austria, Belgium, the Czech Republic, Germany, Italy, the Netherlands, Slovenia, Spain and Sweden do have coordination between all ministries on sustainable development or PC(S)D. However, coordination on PC(S)D is mostly perceived as merely an information exchange between focal points from the ministries involved, which are often represented by less senior public servants. In no country is the power to influence or change policy specified in the mandate of this coordination and/or information exchange mechanism.

Reflection: Having no specific mandate to adjust policies when incoherencies are detected goes against the spirit of the 2030 Agenda. This therefore makes it difficult to guarantee Policy Coherence for Sustainable Development and to avoid negative spillovers. Without a mandate for adjusting policies, coordination is too voluntary and is not effective.

What has also been noted is that the focus of coordination for sustainable development is set up with the aim of making internal policies coherent, but seldom is the external dimension included. Only when coordination is expressly set up for PC(S)D, and the Ministry of Foreign Affairs/ Development Cooperation is involved, is a focus on external impacts integrated – if poorly acted upon in practice.

Participatory processes: several mechanisms for consultation on the implementation of the SDGs, or on policy coherence, are in place. In Belgium, the Czech Republic, Germany, Italy and Spain there is a national council or forum for sustainable development in which civil society groups, trade unions and the private sector all participate. In Austria, Germany, Italy, the Netherlands, Spain and Sweden, consultation mechanisms are in place on sectoral policies, for instance on development cooperation, but not specifically on PCSD. However, there is never full transparency as to why inputs given by civil society are or are not included in the policies proposed.

Reflection: In most of the cases, unfortunately, not enough time is devoted to participation by civil society, nor is it as inclusive as it should be. It is quite often perceived as a 'tick-the-box' exercise, as the input is not used, is sought very late in the process or is given using online tools. While online consultation does have the advantage of reaching more people, a proper dialogue is not possible and input is generally focused on the questions asked, rather than on what people may consider important. Here again, we note that the external dimension and potential negative impacts on the Global South are very seldom examined in consultations. This is a missed opportunity, because civil society organisations are often very aware of incoherencies in policies and their impacts in EU partner countries. They are in close contact with their local partners, and can easily detect and monitor the impact of EU policies on gender equality, food security, environmental degradation, market distortion, waste dumping, climate change and so on.

Policy linkages: mechanisms are needed for ex-ante and ex-post impact assessments for sustainability. No such mechanism has been established in Austria, while in the Netherlands and Sweden there is one, but it lacks incentives to prompt decision-makers to deal with incoherencies. The impact of new policies on developing countries has been identified in the Netherlands since 2019. Reference has been made in Belgium, the Czech Republic, Germany, Slovenia and Spain to the Regulatory Impact Analysis (RIA), an OECD tool for measuring the negative and positive impacts of new regulations. Germany and the Czech Republic commented that externalities for the Global South are not integrated in that tool, while in Belgium they are. The Austrian government uses a tool called "effect-oriented administration": each ministry must define indicators to show what effect it wants to produce with its budget. Impacts on sustainable development in the Global South, however, are not considered. The work that Eurostat is doing on measuring the spillovers of overconsumption has inspired the Italian Statistical Office (ISTAT).

Reflection: This mechanism is crucial for making Policy Coherence for Sustainable Development concrete and actionable. It is also vital that it should include an assessment of the impacts of existing and new domestic policies on third countries. As the results show, however, there is still a good deal of research and other work to do: currently this is still quite ad hoc. It is a good sign that Eurostat is working on an indicator that measures the impact of EU consumption (see promising practices) in the Global South since this could inspire more countries than just Italy.

Alignment across government levels: most countries have coordination mechanisms across governmental levels. Less clear and concrete is their alignment with 2030 Agenda objectives and how PCSD is handled. In Austria, Belgium, Germany, the Netherlands, Spain and Italy, responsibilities are well-defined and regional political responsibilities are also respected in the mechanisms. Alignment is mainly seen as an exchange of information rather than a mechanism to adjust policies when gaps or incoherencies are discovered. In Italy, the national government has started to work with the lower levels of government, and has identified that when it comes to monitoring there are difficulties with data collection and joint definitions of the indicators. In Sweden, local government bodies have full self-determination, and coordination is limited to (voluntary) guidance, so – as in the Czech Republic, Slovenia and the Netherlands – there is no structural coordination on PCSD with lower governance levels.

Reflection: Even in the countries where there is political alignment across government levels, policy coherence is not assessed specifically. Coordination here mainly relates to the official mandates of the subnational governments and the relevant information exchanges. There is no mechanism in place to detect incoherencies in policies and externalities affecting the Global South, and to adjust policies when needed. This is sorely needed.

Monitoring and reporting for policy coherence: Austria, Belgium, the Czech Republic, Germany, Italy, the Netherlands, Spain and Sweden do collect and report data on sustainable development, such as the data they send to Eurostat or use in Voluntary National Review (VNR) reporting during the UN High-level Political Forum (HLPF), where PCSD should be included. The Czech Republic has already reported specifically on the SDG indicator 17.14.1, while PCD reporting exists in Italy, the Netherlands, Spain and Belgium. But no country reports on PCSD based on existing plans with targets or ambitions (Mechanism 2), so none is measuring real progress or adjusting policies on the basis of possible outcomes.

Reflection: For the countries that do have (implicit) reporting on PCSD, only in a very few, such as the Netherlands, do policy adjustments take many SDG areas into account simultaneously or consider future impacts as well as those outside Europe. There is still no indicator relating to the externalities of domestic policies, i.e., to measure their impact on the Global South, and reliance is generally on stories coming from the South, without concrete figures. Monitoring progress is therefore also a difficult exercise. Another finding is that the existing reporting, whether VNR or PCD reporting (OECD), is based on self-assessment, carrying the danger that it is often self-congratulatory.

Financing for Policy Coherence: none of the countries has a specific budget for monitoring PCSD. The activities and instruments described above are part and parcel of officials' daily work, which CONCORD does not interpret as "having a budget". The lack of a specific budget means that policy coherence work is mainly voluntary (information exchange). It is worthwhile mentioning, however, that Sweden plans to have a supplementary budget once in every government term: "In order to increase transparency and promote implementation … which contains an analysis of the current situation, analysis of coherence and a comprehensive account of the government's work with [the] 2030 Agenda". This decision was made in 2020, but has not yet been implemented.

Reflection: It is telling that none of the countries has a specific budget for achieving policy coherence for sustainable development: this shows how low a priority achieving policy coherence is for countries. To date, no country's administration has the core task of detecting policy incoherencies or a mandate to adjust policies to make them coherent.

RECOMMENDATIONS FOR MEMBER STATES

1. EUMS should make their commitment to achieve **PCSD a core policy objective,** and the instruments for attaining it should be embedded in a national governance structure that is also responsible for achieving sustainable development (the 2030 Agenda).

2. PCSD must be implemented by the whole government, with **all ministries involved.**

3. EUMS should ensure that achieving sustainable development is their **highest overall ambition,** not undermined by other plans more focused on economic growth, with PCSD as a **key element.** The newly compulsory National Recovery and Resilience Plans must also be fully in line with 2030 Agenda objectives.

4. Implementing the 2030 Agenda should be planned as part of an overall strategy for sustainable development and should include an action plan, targets, timetables and a division of tasks. It should set clear **PCSD targets.**

5. Having clear coordination between all governance levels is necessary, as is a **mandate to adjust policies** at (sub)national levels when incoherencies are detected. For this purpose, a special multi-sectoral body within the government should be established and given a mandate to lead in policy arbitration processes.

6. Effective, inclusive and meaningful **civil society participation,** including by **partners from the Global South,** is an absolute precondition for creating ownership and improving the implementation of PCSD.

7. EUMS should not put a burden on the Global South when achieving their own sustainable development, so the **impacts of all domestic policies should be assessed and measured to minimise negative impacts.** Where impact studies of the transboundary effects of national policies (such as policies on climate, tax, agriculture, energy or migration, or the arms trade) on the Global South are unavailable, funds from applied research agencies should be earmarked for putting together facts and figures on the existing trade-offs and potential win-wins. If a government has not adopted another mechanism, the OECD RIA tool would be useful for measuring negative impacts.

8. Far more research and data are needed for measuring the spillovers of domestic policies. **Quantitative and qualitative indicators** should be developed and used in PCSD reporting.

9. **A mandatory monitoring scheme for measuring progress** on the implementation of the (sub)national 2030 Agenda, including reporting on PCSD (SDG 17.14), should be put in place.

10. **A cost** for establishing the necessary mechanisms for achieving PCSD should be part of the national budget.

EUROPEAN COMMISSION RESULTS PER MECHANISM UNDER SDG INDICATOR 17.14.1

INSTITUTIONALISATION OF POLITICAL COMMITMENT

In 2015, the European Union adopted the 2030 Agenda, under the previous Commission led by former President Juncker. Several initiatives were taken to discuss the implementation of the 2030 Agenda, but only a few have been institutionalised in the EC's structures.[2]

The European Commission has committed to PCSD, both in the European Consensus for Development (2017) and now, more recently, in the 2020 Staff Working Document, "Delivering on UN's Sustainable Development Goals – a comprehensive approach". However, while the Commission President, Ursula von der Leyen, asked all the Commissioners to be responsible for implementing the SDGs in her personalised mission letters, there is no mention of collective responsibility at the highest level. Making the individual Commissioners responsible for their part of the 2030 Agenda goes against the spirit of the SDGs, which are indivisible. Furthermore, PCSD is not covered in those letters, and nor is the task to coordinate policy coherence with all Commissioners.

LONG-TERM CONSIDERATIONS IN DECISION-MAKING

The Commission also did some retrofitting of the new work programme 2019-2024, with the Six Priorities, in the context of the 2030 Agenda. In the Commission Staff Working Document "Delivering on UN's Sustainable Development Goals – a Comprehensive Approach" the 6 priorities are linked to the achievement of several individual SDGs, visualised in figure 1. SDG 17.14 is part of the priority entitled "Stronger Europe in the World". The EC also described the 8 strands they are going to work on. As figure 2 shows PCSD is one of them.

However, in reality this does not equate to a clear roadmap or strategy which gives an indication of how the 2030 Agenda as a whole will be translated into practice, how the issues will be linked and concretely monitored, or how the EC will avoid any negative impacts on partner countries caused by domestic EU policies. To date, therefore, the continued commitment to PC(S)D is primarily on paper.

Figure 1: How the six priorities of the European Commission's work programme 2019-2024 relate to the 2030 Agenda

2 *Two main mechanisms adopted by the European Commission are the integration of the SDGs into the European Semester (COM(2019) 650 final: Annual Sustainable Growth Strategy 2020) and the decision to integrate the SDGs into all Commission Impact Assessments and evaluations (COM(2021) 219 final).*

Figure 2: Eight strands of European Commission's work programme 2014 - 2024

The European Green Deal (EGD), now being put forward as a transformative agenda to achieve a green and fair Europe, is considered the most important priority of the six. The EGD is presented as Europe's new growth strategy and – although the first sentence of the Annual Sustainable Growth Strategy 2020 sounds promising ("[e]conomic growth is not an end in itself. An economy must work for the people and the planet") - the EGD is undermining the ambition of the 2030 Agenda, as it has predominantly economic aspirations, with environmental ambitions coming second and social ones barely apparent. The EGD certainly does not contribute to PCSD. For example, the EGD is gender blind. Furthermore, the external dimension of the EGD is not addressed at all – how will the green transition for the EU impact on countries in the Global South? A discussion paper on spillovers of the NextGenerationEU was published in 2021, but contained no reference to sustainability or policy coherence. These questions must be thoroughly addressed in the long-term strategies of the EC.

INTER-MINISTERIAL AND CROSS-SECTORAL COORDINATION

There are many structural coordination mechanisms within the European Commission. However, none of them appears to have a clear mandate to guarantee PCSD, decide on trade-offs and align external and internal policies in the framework of the 2030 Agenda.

At a technical level there are interservice consultations between different Directorate Generals. The European Commission's Secretariat General has considerable influence in deciding which DGs should be consulted, while the mandate to decide on trade-offs lies with the DG leading on the policy initiative. However, such trade-offs are not decided on within the comprehensive framework of the SDGs, but rather based on the political priorities set out for each specific EU policy area and DG.

At the political level, there are several coordination mechanisms between DGs. For example:

- The Interservice Steering Group on the UN SDGs: chaired by the Secretary-General with all DGs present. PCD is a standing point on the agenda. But the group has not met in person since the start of the Von der Leyen Commission, exchanging only by mail.
- The EXCO (External Relations Committee): all cabinets are involved at Head of Cabinet level to ensure coherence between internal and external policies, but this is not based on coherence with the 2030 Agenda.
- Commissioner Gentiloni is responsible for coordinating the implementation of the SDGs in the context of the European Semester cycle of economic governance, but PCSD does not play a specific role in this mechanism.
- The regular coordination meetings of the College of Commissioners, but no particular references are made to the implementation of the 2030 Agenda or PCSD.

In principle, as mentioned above, all Commissioners and their DGs are responsible for implementing the SDGs, which include PCSD. In practice, however, PCSD is not obviously addressed, other than by a very limited number of Commissioners (such as Commissioners Gentiloni, Urpilainen and Dalli) who respect the political guidelines and screen policy initiatives against the SDGs to flag inconsistencies at coordination level between cabinets or Commissioners. In general, when trade-offs are being discussed, the guiding compass nowadays appears to be the European Green Deal and the other five EC priorities through which the EU's own interests are prioritised.

PARTICIPATORY PROCESSES

Although the Multi-Stakeholder Platform (MSP) on the SDGs under the Juncker Commission had enabled good collaboration between stakeholders representing different interests, the von der Leyen Commission decided not to renew the Platform. This means that there is now no participatory process on the implementation of the SDGs. The MSP had limitations, but it provided an opportunity to discuss with a diversity of stakeholders the best way to achieve an effective implementation of the SDGs, including PCSD. The members of the MSP brought different expertise and were able to discuss trade-offs for the EC to consider. It could have been an important participatory mechanism for delivering on PCSD. There are many sectoral or policy-specific consultations with civil society, but none offer the possibility of conducting PCSD assessments or ensuring that PCSD is an integral part of the policy process. Stakeholders from the Global South are seldom invited to participate. Furthermore, owing to the very nature of such one-off consultations, this results in a fragmented approach and goes against the spirit of the 2030 Agenda and PCSD.

POLICY LINKAGES

The European Commission has a strong commitment to PCD as it is enshrined in the EU Treaty on the Functioning of the European Union (TFEU). However, in reality, PCD is rarely enforced owing to weak political will and weak tools to ensure development objectives are prioritised in other areas of EU policy-making. In the Commission Staff Working Document, a good case is made for the importance of linking all policies and delivering on PCSD. In that document two instruments are considered to be effective:

- Better Regulation is one of the mechanisms through which the European Commission plans to integrate PCSD and the SDGs into EU policy-making processes. In the updated Better Regulation package there is an Impact Assessment tool (#35) to measure impacts on partner countries and there is a new tool on SDG integration. But the Better Regulation package is not a neutral tool to evaluate impacts and does not have a comprehensive sustainable development focus – the economic impact assessment tools far outweigh the social or environmental ones. The latest Communication on Better Regulation promises integration of the SDGs in Impact Assessments and evaluation, but whether and how this will work in practice is yet to be seen.

- The European Commission also implies that its Strategic Foresight Report is an important mechanism to ensure policy coherence as it can "anticipate developments and prepare for new opportunities and challenges earlier and more effectively". This report does not, however, use the 2030 Agenda as its guiding framework and is therefore not a tool that will ensure PCSD.

ALIGNMENT ACROSS GOVERNMENT LEVELS

There is no mechanism at all which covers different levels of governance in the EU. DG Regio, which is responsible for connecting with the regions and the cities, does not mention PCSD in its Strategic Plan 2020-2024. The Committee of the Regions, another coordination body serving the regions and lower level governance institutions, also fails to mention PCSD in its Political Priorities for 2020-2025.

MONITORING AND REPORTING FOR POLICY COHERENCE

Reporting on PCD exists, and in the last report published in 2019, an effort was made to include more chapters related to the 2030 Agenda. In 2015, with the adoption of the 2030 Agenda, the Council of the EU "invited the Commission (...) to present concrete proposals on how to better integrate PCD into the EU approach to implementing the 2030 Agenda". It will be key to adapt monitoring and reporting to the new political framework so that PCD is no longer perceived as being a stand-alone policy initiative specific to development cooperation but rather a key element in the EU's efforts to implement the 2030 Agenda and the SDGs as a whole. The Commission believes that PCD reporting is better integrated in EU reporting on the SDGs, and hence this work is now closely linked to the Reflection Paper, "Towards a sustainable Europe by 2030".

The main issue is that - just as in Member States - real quantitative indicators are missing; it is a narrative report. Monitoring progress is very difficult without having facts and figures. Eurostat, which reported in 2021 on the progress of the SDGs, including SDG17.14, presented an interesting attempt to measure the spillover effects linked to EU trade and global supply chains. It was especially welcome that the focus shifted from production to consumption. See promising practice.

FINANCING FOR POLICY COHERENCE

There is no specific budget to achieve PCSD.

RECOMMENDATIONS FOR THE EC

1. The European Commission should develop a Sustainable Europe 2030 Strategy and an overarching Implementation Plan for the Sustainable Development Goals. It should include a mechanism for guaranteeing PCSD (SDG 17.14) for all EU policies. The strategy should include impact assessments and tools which could be replicated in national implementation and monitoring. This strategy would therefore act as a driver for PCSD. European Commission President, Ursula von der Leyen, should take the leadership and overall responsibility for Policy Coherence for Sustainable Development in the European Commission and each Commissioner should set out a roadmap for how they intend to achieve the SDGs and PCSD.

2. The Impact Assessment framework, under the Better Regulation package, must fully integrate the SDGs – rather than simply taking them into account – so as to acknowledge the SDGs as the overarching framework for EU policy-making. This means that interlinkages, synergies and trade-offs between all the dimensions of sustainable development should be systematically considered in impact assessments, as well as the impacts of EU policies on the Global South. This would ensure that EU policies help to achieve the Sustainable Development Goals, both in Europe and globally.

3. A PCSD assessment should be included in all European consultations on new policies, and relevant stakeholders from Europe and the Global South should be systematically and meaningfully consulted.

4. The European Commission must strengthen its policies for effective civil society engagement to ensure systematic and meaningful participation and consultations. At EU level, the multi-stakeholder platform could be re-installed, after an evaluation of the former one, and with an enhanced focus on PCSD.

5. The European Commission should work together with the European Parliament to ensure that PCSD is integrated into all legislative and policy processes.

6. Where a negative impact on developing countries is likely, it is crucial that mitigating action is taken. This should be done early in the process in collaboration with DG INTPA.

7. The Strategic Foresight Report should embed the 2030 Agenda and the achievement of the SDGs at its core – demonstrating how future trends could positively or negatively impact the EU's and its partner countries' achievement of the 2030 Agenda.

8. The EU should encourage all Member States to report on the SDG indicator 17.14.1 as part of their national reporting towards Eurostat, to be included in the annual Sustainable Development Report. This could be complemented by EU-funded civil society shadow reports in Member States, focusing on the (negative) impacts of domestic policies and practices on the Global South.

9. The EU (and its Member States) should consider developing more evidence-based indicators, like the consumption-based spillover indicator included in the latest Eurostat report. Current proposals are overly simplistic and require a more comprehensive and critical approach.

GENERAL CONCLUSIONS

The reviews give a wealth of useful information about how countries deal in different ways with achieving PC(S)D. As with many qualitative indicators, however, the outcomes are influenced by how the reviewers in the different countries interpret particular definitions and ambitions.

PCSD is undoubtedly key to achieving the 2030 Agenda. It is unfortunate, therefore, that it is just one in the list of 169 targets (SDG 17.14). In this report it became clear that the pilot countries and the EC do recognise the importance of PCSD. But since their governance structures are different in set-up, in history and in culture, how they deal with PCSD is also quite different. Mechanisms for measuring PCSD can be found in many different places in the various governance structures. One way is not necessarily better than another, provided all eight mechanisms of SDG indicator 17.14.1 are included. There is no one-size-fits-all approach, and sometimes it is better to have an imperfect structure that works than one that is perfectly described on paper, in national plans and strategies, but is not actually used. Of course, this is very complex: linking policies is already too difficult for most governments, conducting comprehensive impact assessments is time-consuming, and deciding on priorities causes endless discussions and power games between (vested) interests. Ultimately, it all comes down to political decisions, and not just policy tools.

Several initiatives have been set up to improve understanding, develop tools and exchange information on how best to measure, monitor and push for progress on PCSD. This research, using the SDG indicator 17.14.1, also has this aim. As mentioned, PCSD has three objectives:

- ☑ To foster synergies across policy areas and between sectors
- ☑ To ensure that today's policies do not undermine the well-being or sustainable development of future generations
- ☑ To identify and address trade-offs, or negative spillovers, both between domestic policies and in domestic policies that affect other countries

This study made it very clear that the first objective is becoming mainstreamed into policy-making. No government is today working in clearly separated silos, except perhaps for defence ministries. The second objective is implied in work on sustainable development, but more explicitly addressed in work on the environment and climate change. Lastly, the third objective of PCSD – which is the main focus of this report - is starting to receive more recognition, and in some countries more than others, but almost nothing is done to address spillovers. There is a huge gap in research, data collecting and, most importantly, in the ability of governance structures to adjust policies when they prove to have negative effects on the achievement of the 2030 Agenda in the Global South. This is precisely where civil society organisations can play an important role.

PART II
COUNTRY PAGES
9 Member State Examples

AUSTRIA

In Austria, a general political commitment to the 2030 Agenda and to PCD is endorsed at a high level: PCD has been integrated into both the law on development cooperation and the government's work programme (2020-2024), and there has been a ministerial decision to implement the 2030 Agenda, for which Austria adopts a mainstreaming approach. Each ministry is responsible for implementing the 2030 Agenda, but there is no overall long-term strategy at the federal level. Several ministries do have SDG action plans, however, and in the inter-ministerial working group (IMAG) on them they exchange information on implementation. The IMAG is led jointly by the Chancellery and the Ministry of Foreign Affairs, and each federal state is represented by its SDG focal point.
Despite the political commitment to PCD, there is a lack of structure for implementing PCD across ministries and ensuring that all policies are coherent with sustainable development. Moreover, the government has given no institution a political mandate at the highest political level to adapt policies when practices are incoherent.

Indeed, the OECD DAC Peer Review of 2020 found that Austria lacked the systems and structures needed to achieve PCD in practice. It recommended that Austria "should empower and resource a focal point or institution to lead on policy coherence for development, including responsibility for developing an action plan to address key areas of incoherence". The IMAG could in the future become such an institution, to foster PCSD (including decisions on trade-offs), but for this purpose it would have to be given a clear political mandate. No other effective monitoring mechanism exists for PCSD.

The IMAG's current mandate is to exchange information on activities undertaken to implement the 2030 Agenda – which is not enough to achieve PCSD. This shows a lack of political will when it comes to PCSD in practice, especially in terms of possible trade-offs and (negative) effects on countries in the Global South.

The quality of consultations with civil society varies from one meeting to the next, as no common rules are applied. Generally speaking, the quality of these consultations should be improved.

Austria could improve the existing IMAG through the participation of high-level representatives from all ministries to discuss the interlinkages, impacts and trade-offs of their domestic policies as they affect the Global South, and by giving these ministries a clear political mandate to adjust policies where they find incoherent practices. Austria should also ensure that civil society can participate fully, as civil society organisations are often well informed of the impact national policies are having on countries in the Global South.

BELGIUM

Belgium is a small but complex country, with governments and parliaments at the federal level, the regional level (Flanders, Wallonia and Brussels) and the community level (Dutch-speaking, French-speaking and German-speaking), each having executive and law-making powers without any hierarchy between them. Each of these governments is a coalition of parties representing a variety of political hues.

The pursuit of sustainable development is enshrined in the constitution, but focuses on its achievement within Belgium. A broad, ambitious approach to PCD is written into the law on development cooperation. In 2014, the then federal government and governments of the federated entities made a joint political commitment to PCD, but this has not been reaffirmed since. The current federal government has renewed its commitment to PCD, however, and is working on a PCD plan to achieve practical progress in several policy domains. After an interval of almost 12 years, it has also adopted a new Federal Plan for Sustainable Development.

Inter-ministerial coordination does exist but it is not particularly geared towards PC(S)D, even though there is an interdepartmental commission on sustainable development with representatives from both the federal and federated administrations.

There are federal advisory bodies for PCD and PCSD, and both are quite productive. Consultation of the latter is sometimes compulsory. Whether their recommendations have any actual impact, however, is unclear. Federal reports on sustainable development are published by the sustainable development task force of the Federal Planning Bureau, while the federal advisory bodies also produce their own reports or opinions. There are no specific budgets for PC(S)D other than for the functioning of the administrative and advisory bodies.

All in all, Belgium has some good instruments in place for sustainable development and policy coherence, but its policies are still driven far more by political compromises than by the Sustainable Development Goals.

Sustainable development, and PCSD, are already quite well established in Belgium's institutions, at several levels of governance. In parallel, there is a mechanism for PCD – which is promising, because it focuses on externalities, which are generally overlooked in the institutionalisation of sustainable development. Some improvements are still necessary, however: for example, the PCD Action Plan currently being developed by the Minister for Development Cooperation is a positive step and should be finalised, in consultation with the PCD Advisory Council. Furthermore, the inter-ministerial conference on sustainable development should be revived and should systematically consider external impacts, as this is not only implied in the notion of policy coherence for sustainable development but is also required under

the Belgian law on development cooperation. Such initiatives should include paying close attention to the external impacts of Belgian policies at all governance levels, including the federated ones. Close monitoring of progress would hopefully stop long-term ambitions from being overruled by short-term, day-to-day, political pragmatism.

CZECH REPUBLIC

Political commitment to policy coherence for both development and sustainable development is enshrined not in law, but in a long-term government strategy, Czech Republic 2030, that is regularly updated and has thus been re-confirmed by successive governments. However, both awareness of PC(S)D and top decision-makers' political will to implement it remain very limited, and the coherence agenda is advanced chiefly by the Ministry of the Environment, which oversees the broader sustainable development agenda.

PCSD in general, and PCD in particular, have been translated into specific targets in the Czech Republic 2030 strategy, but little progress has been made. The current revision contains a draft proposal to conduct impact studies on two selected areas of PCD in the medium term.

While the institutional setup looks largely adequate on paper, neither the Council on Sustainable Development (responsible for PCSD and chaired by the PM) and its subsidiary bodies, nor the Council for Foreign Development Cooperation (responsible for PCD and chaired by the MFA), meets frequently enough to go beyond mere information exchange and coordination, while the sustainable development focal points at different ministries do not have enough capacity to do so.

The Ministry of the Environment (MoE) envisages improving (rather than amending) the existing Regulatory Impact Assessment to reflect the SDGs in its daily decision-making, taking impacts on the Global South into account. While this is a promising path, in practice the sustainable development focal points in the Ministry of Foreign Affairs and other ministries are already entitled to participate in the process of commenting on laws and government bills that may affect the Global South, which is a sign that they lack the capacity to do so. On the other hand, the MoE does have enough monitoring capacity to oversee general progress on PCSD/PCD, and the Czech Republic was among the first countries to report on SDG indicator 17.14.1.

Policy coherence is recognised as being important, but the mechanism for taking it into account in day-to-day decisions is still very weak. Sustainable development, and actions to achieve PCSD, should be raised up to a higher level in the governmental hierarchy and require the active participation of all ministries. Civil society participation does exist, but more transparency is needed on how civil society's input is used. Funds should be allocated to collect evidence on existing incoherencies and to raise awareness of PCD and PCSD.

GERMANY

The German government has committed itself to implementing the 2030 Agenda goals and targets coherently. It plans to achieve sustainable development through a "triple approach" consisting of implementation in, with and through Germany. The government iterates this commitment regularly, especially with regard to policies aimed at partner countries in the Global South.

Sustainable development has been on the agenda of German governments since before the adoption of the 2030 Agenda: back in 2002, the government developed a sustainability strategy, which was comprehensively revised in 2016 to incorporate the 2030 Agenda commitments. However, the external dimension, concerning trade-offs and spillover effects that affect the poorest countries, is insufficiently covered by the strategy and its few international indicators. Conflicts between individual goals and spillover effects were addressed for the first time when the strategy was updated in 2021. It now also identifies overarching areas for transformation that can or should contribute to greater coherence.

The implementation of the German Sustainable Development Strategy is supported by an elaborate governance structure which includes different levels of government ranging from inter-ministerial coordination to collaboration between the national government and the Bundesländer governments, coordinated by the Chancellery. The Sustainability Council provides the government with scientific and stakeholder advice. There is no specific workistream on PCSD.

There is no dedicated budget for achieving the 2030 Agenda, so none for PCSD either.

Germany has institutionalised sustainable development very well and is using the 2030 Agenda as its compass. Unfortunately, there is no special mechanism, or budget, for fully monitoring policy coherence for sustainable development, although it is recognised that monitoring is very important, as demonstrated by the "triple approach". As Germany wants to deliver on all SDGs, and they include SDG 17.14, it should also report and monitor on that.

ITALY

The Italian government, with technical assistance from the OECD, is in the process of drafting its Coherence Plan for Sustainable Development in the context of its revision of the National Strategy for Sustainable Development, which is due to be adopted in 2021/22. Until now, there have been no visions, tools, indicators, analysis or assessments relating to PCSD in Italy. In particular, coherence between the internal and external dimensions – or, spillover effects – has not been considered: a shortcoming that was also pointed out in the last DAC/OECD Peer Review. A long-term vision capable of better integrating the economic, social and environmental dimensions is yet to be developed, with the social dimension particularly lacking. There are imbalances and plans that proceed separately, but no unified governance.

Nevertheless, in recent years there has been a growing institutional – and even political – awareness of the need to define and apply PCSD. A technical committee has been set up to try to bolster the competencies of ministries. Work is underway on tools and indicators. Consultation bodies have been created which include civil society, and the work being done with the regions and metropolitan municipalities is very promising. A number of local governments have drawn up their own strategies, improving internal coordination and devising ways for civil society to participate. Some are also examining the external dimensions of their policies, strengthening decentralised and territorial cooperation.

Italy recognises policy coherence for sustainable development at a high level, although so far, the framework has barely been applied to concrete policy-making processes. The forthcoming plan on PCSD should be integrated in the revised strategy on sustainable development, adopting SDG Indicator 17.14.1. Inter-ministerial committees should be better coordinated and should share a single vision based on the 2030 Agenda. It is interesting that Italy, together with Eurostat, is developing an indicator to measure spillover effects relating to consumption, which could then be shared with other EU countries. Civil society should be included in this process, including for data collection. However, far more effective mechanisms are needed to take the views of CSOs on board. Lastly, if policy coherence is to be taken seriously and mainstreamed by Italy's institutions, a dedicated budget will be needed.

THE NETHERLANDS

The Netherlands is committed to PC(S)D and supports the Sustainable Development Goals. The National Action Plan for PCD was reviewed in 2018, and focuses on the following thematic areas: development-friendly trade agreements, the prevention of tax avoidance and evasion, a development-friendly investment regime, making production and trade more sustainable, and combatting climate change. A yearly report (the coherence report) discusses the progress of the action plan. Furthermore, the Impact Assessment Framework studies the effects of new policies on citizens, business, government, ICT, the environment, national borders, gender equality and partner countries, and is in line with the Sustainable Development Goals. Impacts of policies on future generations are not specifically taken into account. There is inter-ministerial coordination on PCD, and SDG focal points in every ministry, which are coordinated by the Minister for Trade and Foreign Affairs. While there is no specific consultation on PCSD, it is implicitly included in the consultation which occurs for every policy and law. An annual report gives updates on the actions taken in line with the SDG action plan, while the statistical bureau of the Netherlands now reports yearly on the effects of Dutch policies, showing the progress made on the SDGs and focusing on the policies' effects now, in the future and elsewhere. There is no separate budget for PCSD or PCD.

Implementing and reporting on PCSD is nonetheless limited at present, so it is crucial to involve all ministries, not just the Ministry of Foreign Affairs and Trade. If reporting is coordinated, progress and gaps can be monitored more easily and all spillovers can be covered, not only those that the government regards as important. Despite the existence of a mechanism to monitor impacts of domestic policies, such as agriculture, on the Global South, in reality it is not clear how or even whether it is applied to those policies. Research and reporting on the spillovers of domestic policies are crucial It is also important for the coordinating body to be mandated to recommend adjustments to policies where it finds incoherencies. Civil society groups should be better involved, given their knowledge of the situation in the Global South, and there should be transparency on what is done with the input they offer to decision-makers.

SLOVENIA

In 2017, Slovenia adopted a National Development Strategy (Strategija razvoja Slovenije, SRS), a document that addresses "the implementation of the global development plan of the United Nations – the 2030 Agenda for Sustainable Development". Valid until 2030, the SRS identifies "coherence of development policies" as the key factor in horizontal and multilevel cooperation on attaining the SDGs. Unfortunately, the next steps in the implementation of the SRS have been either delayed or halted owing to changes of government and the COVID-19 situation. In its audit published in 2021, the Court of Auditors identified a series of actions needed to improve the implementation of the SRS and the 2030 Agenda, which would also improve the implementation of PCD and PCSD at government level.

The new national strategy for development cooperation and humanitarian aid (2018-2030) includes a PCD implementation plan. It states that by 2021 the relevant ministries, in cooperation with the Ministry of Foreign Affairs as the National Coordinator for Development Cooperation, will prepare a review of their current practices on each of the European Union's priorities for PCD. It also envisages that PCD will be incorporated into the national systems for monitoring PCSD. An evaluation of how the Strategy – including the PCD-related measures – has been implemented is planned for 2023.

The second Voluntary National Report (VNR, 2020) explicitly recognises PCSD as the approach that will best maximise potential and capacity in the field of sustainable development. Membership of the inter-ministerial working group on development cooperation (renamed the Permanent Coordination Group for Development Cooperation) was renewed in 2021, and the group was given the additional task of monitoring PCD at government level. It involves all the ministries and government services that either undertake or finance international development cooperation activities.

A National Network on PC(S)D was set up in 2017, thanks to a three-year project entitled "Developing capacities together: European CSO-university networks for global learning on migration, security and sustainable development in an interdependent world" (InterCAP). It represented NGOs, academics and administrative bodies working on international cooperation and trade. In this network, steps were taken to make progress in setting up the PC(S)D system.

In 2021, the Ministry of Foreign Affairs had intended to begin a so-called targeted research project *(Ciljni Raziskovalni Projekt, CRP)* entitled "Policy coherence and (sustainable) development – assessment of the impact of Slovene national policies on developing countries and on sustainable development". A separate budget was reserved for it, but in the end, unfortunately, the project was not supported owing to budgetary constraints.

Slovenia has been setting up interesting initiatives to achieve and monitor PCSD, but it has still not been institutionsalised in government structures, which do not have a clear mandate to adjust policies found to be incoherent. The authorities apparently intend to involve civil society groups, but it is too soon yet to see what this will lead to. There is still no monitoring system to measure any progress made, especially on the impact of domestic policies on the Global South.

PROMISING PRACTICES

EUROSTAT: Eurostat has developed an indicator for spillover effects on consumption patterns in the EU, which it presented in its 2021 Report. This is very promising. For several years now, Eurostat, a supra-national statistical office, has invested heavily in tracking transboundary environmental impacts by modelling footprint indicators based on official statistics. It now calculates three types of environmental spillovers: the material footprint, the carbon and CO2 emissions footprint and the air pollution footprint. It also measures a social spillover (employment) and an economic spillover (income).

It has become clear that the EU's material footprint is far too high in relation to its 'fair share'. Eurostat claims that EU imports have positive social and economic spillover effects, because these imports have provided employment for 69 million people and have generated EUR 500 billion of income in the rest of the world. However, there are no data on how decent those jobs are (for instance in the mining sector, in fast-fashion factories or on banana plantations). The fact that Eurostat is making an effort to develop an indicator for the spillover effects of consumption within the EU is promising, but there is still a good deal of research to do to measure other (negative) impacts of domestic policies, such as the impact of the Common Agricultural Policy, with its heavily subsidised food products, on local markets in the Global South.

SPAIN

In Spain, there is a traditional PCD mechanism embedded in the cooperation system. It used to produce reports every two years, based on information provided by several focal points from within all ministries and the ex-post assessment of a committee in the Cooperation Council. This mechanism, which dates back approximately 15 years, has not had sufficient impact on governmental practice. In 2021, at the High-level Political Forum on Sustainable Development, the government presented "A Sustainable Development Agenda: Towards 2030" and the third "Progress on SDGs" report, which contained a commitment to develop a PCSD system in consultation with all stakeholders over the next few years; in the autumn of 2021 a dialogue was started. Although there is no single PCSD mechanism, or any specific reporting system, some initiatives have emerged: a) both the Cooperation Council and the Sustainable Development Council have made recommendations, with civil society's input, for how to move forward and develop concrete mechanisms with which to fulfil the commitment to improving PCSD practices, and b) there is a 2030 Agenda architecture involving a ministerial committee composed of representatives of 15 ministries, a sustainable development council and a parliamentary committee with the potential to handle the PCSD monitoring framework, although this has not been done so far. In addition, there have been some hints about a dedicated budget for organising some PCSD activities, but no amount has been clearly specified as yet. However, when announcing the 2021 national budget the government released a parallel report showing the budgetary contribution to the SDGs.

Spain has begun a promising process for delivering PCSD, whereby the government intends to discuss and coordinate policy coherence for sustainable development with all 2030 Agenda stakeholders. A fundamental transformation of public policies must be considered so as to prevent overlaps and incoherencies, including spillover effects. Effective civil society participation and involvement in the decision-making and reporting system is key to this.

PROMISING PRACTICES

SPAIN: The Spanish government has shown remarkable leadership on the SDGs and the Paris Agreement, pushing transformative positions on systemic challenges, in the EU and in multilateral fora, on issues such as a green transition, inequalities and taxation, women and labour rights, civic and democratic space, etc. Huge contradictions between policies still remain, however. Spain is far from fulfilling the Paris Agreement; it is the seventh-largest global seller of weapons to conflict areas; Spanish multinational companies are failing to comply with human rights obligations, and so on.

Subsequent to the 2021 HLPF, the government, the new 2030 architecture provides an opportunity to amplify the political space for PCSD. Civil society is included in a meaningful, overarching and inclusive PCSD system through the Sustainable Development Council.

President Sanchez is pushing for a revision of the concept of progress, especially as regards spillover effects and systemic challenges, as he stressed in the UN General Assembly in 2020: "We can't continue to nurture a fake concept of progress that implies more poverty and injustice for millions of human beings." In this context, the government has endorsed some transformative initiatives such as supporting a waiver on intellectual property rights and for the IMF's allocation of special drawing rights for overcoming the economic downturn in the Global South. This context therefore provides an opportunity to reinforce the current PCD mechanism for addressing negative spillover effects in a meaningful PCSD system that will further the achievement of the 2030 Agenda.

A positive dynamic has been created by the leadership of civil society pushing political space for PCSD forward with two initiatives:

- A comprehensive proposal for a PCSD system presented by the cross-sectoral platform Futuro en Comun, which was embraced by the government and is now being discussed in the Sustainable Development Council.

- A contribution to the policy analysis around PCSD with an overarching indicator: the Policy Coherence for Sustainable Development Index (PCSDI) (PCSDI Report 2019) measures, evaluates and compares countries' commitments to sustainable, fair and equitable development. The Spanish Development NGO umbrella group, in cooperation with the Spanish Network of Development Studies, is currently developing the third version of the index.

SWEDEN

Sweden has a long history of working for policy coherence. However, despite high ambitions, challenges remain. In 2003, there was a unanimous parliamentary decision that sustainable development should be the goal of Sweden's Policy on Global Development (PGD) and that it should be integrated into all policies. However, subsequent monitoring, undertaken to determine the degree to which Sweden's policies respect policy coherence for sustainable development, has shown that, regardless of the government in place, the promised policy coherence is lacking in several policy areas. Moreover, the handling of conflicts of interests has been unclear, as has the rationale behind various decisions made by the government.

In 2020, the Swedish Parliament adopted a bill on Sweden's national implementation of the 2030 Agenda with an overall goal including PCSD. In the bill the Government presents the future direction for the work of implementing the 2030 Agenda and the SDGs by integrating the 2030 Agenda into ordinary governance processes and procedures. The PGD is seen as an integral part of and a tool for the achievement of the SDGs and thanks to the bill it has been integrated into the work on the 2030 Agenda. How efficient the new approach will be remains to be seen as many of the mechanisms have yet to be implemented.

The Swedish government should put in place an effective mechanism to measure and monitor Policy Coherence for Sustainable Development. This should include collecting and reporting on data on the potential impacts of domestic policies for the Global South. Coordination across all ministries will be key, including mandating a body to adjust policies if necessary. An advisory group from civil society should give input and create ownership and understanding of the above-mentioned mechanism for PCSD, while also guiding and follow up on its findings.

ANNEX 1: ON THE METHODOLOGY

To examine implementation of the SDG Indicator 17.14.1 in practice, CONCORD selected nine pilot EU Member States. The nine countries are a sample from across the EU regions (North, South, East and West), taking into account their size and their level of experience of PC(S)D monitoring. They are: Austria, Belgium, the Czech Republic, Germany, Italy, Netherlands, Slovenia, Spain and Sweden. The European Commission was also reviewed, as it has announced high ambitions for policy coherence for sustainable development.

CONCORD's National Platforms each assessed their own pilot country, using official reporting (desk review) and/or interviews with relevant decision-makers, while the CONCORD Secretariat reviewed the European Commission.

The results were based mainly on national and narrative reviews of the eight mechanisms described in SDG indicator 17.14.1, although points were allocated per country per mechanism, and were discussed by CONCORD members and the Secretariat. It became clear, however, that the scores given per country per mechanism were too subjective, so it was decided to omit them from the report.

Analysing, but above all comparing, the outcomes of the reviews was problematic, as it was not always clear where a distinction had been made between PCD and PCSD, or how. In some countries the existing PCD mechanism was broadened to include sustainability issues, or trade-offs of national policies, whereas other countries introduced new mechanisms for PCSD. In another set of countries, references were made to mechanisms that had been embedded since an earlier institutionalisation of sustainable development (as required by United Nations Agenda 21, adopted in 1992) as a means to implement PCSD. Owing to the difficulty in comparing the results of the reviews, CONCORD decided not to rank the countries on performance. Instead, we clarified which existing or new governance structure the PCSD mechanism was integrated into.

It was also difficult to compare the reviews on Mechanism 4 relating to participatory processes: reviewers' appreciation of the present situation can depend on a country's general level of governmental transparency and of civil society participation in decision-making. In countries with a long track record of public consultation the scores were lower, because the partners conducting the review had higher ambitions; whereas in those where public consultation is traditionally rather limited, and an advisory council involving civil society had been established for the first time, the appreciation (score) was far higher. When too much participation was required of civil society, but its input was given little heed, participation was regarded as symbolic, and "consultation fatigue" was also mentioned as an issue. This too resulted in a lower score.

The report, based on all the information supplied by the reviewers, gives an overview of the results per mechanism, per country and for the European Commission, together with reflections and recommendations. It highlights some promising practices. As SDG indicator 17.14.1 is quite new and a 'work in progress', CONCORD offers some proposals to improve further the usefulness of this indicator.

ANNEX 2: SOME COMMENTS ON THE USE OF SDG INDICATOR 17.14.1

SDG indicator 17.14.1 focuses on mechanisms established to coordinate and monitor policy coherence for sustainable development, and is quite comprehensive. Those who designed it intended that it should be changed in response to people's experiences of using it.

Introducing the eight mechanisms described in SDG indicator 17.14.1 is a step in the right direction. To achieve PCSD, however, all of the mechanisms – not just a few – need to be in place: they are closely linked, and to be missing even one of them can undermine efforts on the others. This is not clearly acknowledged in the indicator itself.

This report shows that using SDG indicator 17.14.1 is less straightforward than one might expect. The indicator focuses on whether a mechanism is in place: there is no requirement to check *how well it is functioning.*

It is also clear from the research, that it is difficult to compare the reviews by the different countries. They all have different starting points, administrative bodies, and different historical traditions of governance – all of which affects where PCSD mechanisms would fit best in a given country.

When reviewing inter-ministerial and cross-sectoral coordination, the indicator does not prescribe whether all ministries are required to be involved, or whether two, for instance, would suffice. However, a higher score should be given if all ministries are involved in achieving PCSD.

As we saw from the results, cross-sectoral coordination is often limited to an *information exchange* and the coordination body never has a *real mandate to adjust policies* where incoherencies are found – so it is not very effective. A mandate to adjust policies on trade-offs is worth only 2 points (out of a total of 80), even though, in CONCORD's opinion, this is the most crucial precondition for really delivering on PCSD.

The EU and its Member States are also a special case in this exercise, as PCD mechanisms have been in place for many years at both the national and EU levels. The research shows that, when reviewing PCSD using SDG indicator 17.14.1, the results are quite diverse and sometimes confusing, as different countries refer to different processes: sustainable development, PCD or PCSD.

Another problem is the fact that detecting the effects of domestic policies on the Global South is explicitly mentioned only in the review of Mechanism 5 (policy linkages between the different dimensions of sustainable development). For the EU region, however, this assessment (as part of PCSD) is very important, as many domestic policies of the Global North are having a negative impact on the sustainable development of the Global South.

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PLAN INTERNATIONAL

Save the Children

Sightsavers

solidar

SOS CHILDREN'S VILLAGES INTERNATIONAL

Terre des Hommes
International Federation

wecf

Wetlands INTERNATIONAL

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EUROPEAN ASSOCIATION FOR THE EDUCATION OF ADULTS

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