

# A PCSD perspective on the European Commission Work Programme 2020 (July 2020)

## Introduction

The need for policy coherence for sustainable development is more evident than ever. The current COVID-19 pandemic is having devastating impacts on people's lives and health. The crisis has also affected people's human rights - economic, social, cultural, civil and political - and has made inequalities within and between countries even more flagrant. CONCORD has pushed for the need for strong international cooperation to address this global challenge and has reminded policy-makers that **Policy Coherence for Sustainable Development (PCSD) must be the key framework within which to address policy challenges caused by COVID-19**. The European Commission must keep their commitment to work with, and support, partner countries in the long-term to achieve a prosperous, just and sustainable future for people and planet, in line with the 2030 Agenda.

In this paper, CONCORD has analysed the European Commission work programme - both the first version released in January 2020<sup>1</sup> as well the version from May 2020<sup>2</sup> (adjusted to the realities of COVID-19) - to provide a few key entry points for the EU as to when and how to apply policy coherence for sustainable development and accelerate progress towards the Sustainable Development Goals.

## PART 1: Our view on “A union that strives for more”

### 1. The 2030 Agenda must guide all policy-making - especially in a time of crisis

CONCORD welcomes the fact that the European Commission 2020 Work Programme states that the United Nations 2030 Agenda for Sustainable Development will be the compass to guide the European Commission throughout the year. Furthermore, we are glad to see that the European Commission commits to putting the United Nations Sustainable Development Goals (SDGs) at the heart of its policy-making. It is key that this will guide the work of the EU across all sectors, both in its internal and external action, and that the EU truly shows its commitment to sustainable development at home and abroad. In this context, we especially look forward to **the Commission's proposal for their approach to the overall governance and implementation of the 2030 Agenda** and its 17 Goals, as well as the principle to reach the furthest behind first. CONCORD, also as part of the Multistakeholder Platform for the SDGs, has urged the Commission to put forward a strategy for the implementation of the 2030 Agenda.<sup>3</sup>

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<sup>1</sup> [European Commission Work Programme 2020](#) (Jan 2020)

<sup>2</sup> [Adjusted European Commission Work Programme](#) (May 2020)

<sup>3</sup> [https://concordeurope.org/wp-content/uploads/2019/12/EU\\_SDG\\_MSP\\_Letter\\_EC\\_President\\_Dec2019.pdf](https://concordeurope.org/wp-content/uploads/2019/12/EU_SDG_MSP_Letter_EC_President_Dec2019.pdf)

In this context, the EU must address the gap between good intentions and committing the means to putting PCSD into practice. CONCORD welcomes the fact that each Commissioner will have to ensure the delivery of the United Nations Sustainable Development Goals within their policy area. However, for the College as a whole to be able to successfully implement the Goals, it must develop a plan of implementation. This plan must also be reflected in the EU budget and be accompanied by a reporting system that takes the economic, social, environmental and governance dimensions of sustainable development into account. In addition, the responsibility for implementing PCSD in practice must go beyond the “PCD” colleagues in DG DEVCO.

The COVID-19 pandemic has considerably changed the plans of the European Commission and a repriorisation of its initiatives for this year is understandable in light of the need to redirect human and financial resources to address the current crisis. However, CONCORD Europe urges the EU to focus on **developing a common strategy to make stronger linkages and ensure policy coherence** between the various levels and spheres of action, starting by bringing together and scaling up the external response. With COVID-19 afflicting all of us, **the 2030 Agenda must guide us through a just recovery**, towards a healthy and equitable future for all. The absence of policy coherence for sustainable development is a significant threat to the successful implementation of the 2030 Agenda and its Sustainable Development Goals. PCSD must therefore be used as a key framework and all EU internal and external policies should be aligned with the SDGs across all sectoral policies and programmes.

## 2. A geopolitical commission - EU interests vs. global sustainability?

The current Commission has the intention to be geopolitical. The 2020 Commission work programme highlights the need for a strong and united European Union. All actions and initiatives planned will have a strong focus on external action. The Commission’s agenda is to “advance our values, promote and protect Europe's interests through open and fair trade and strengthen the links between our internal and external policies”. **While improving internal and external coherence is positive, the EU must do so with the 2030 Agenda as its guiding framework.** When EU interests might go against global sustainability, conflicting interests must be analysed and systematically handled in all decision-making processes. Economic growth should not be the only parameter to guide the decision-making in this context. Specifically, development cooperation should not be instrumentalised as a tool to conduct foreign policy, especially if that is in contradiction with SDGs and multilateralism, or as a tool to deter migration in third countries to prevent migrants from arriving in Europe.

The EU should prioritise policies guided by global sustainable development and human rights over short-term interests. The EU should dare to take this long-term approach to invest in our future. This means that EU interests should not prevail over partner countries’ objectives to achieve Sustainable Development - which is the very principle underpinning PCSD. In order to achieve this, the application of mechanisms to determine possible contradictions and mitigating responses, in EU policy-making, is fundamental. Part of this is also to address the “rules of the game” and to work towards a global system that generates global goods not only based on economic profit but that also brings the well-being of people and planet into the picture.

### 3. Foresight as a tool for PCSD - not to get “EU ahead of the curve” at all costs

CONCORD welcomes the fact that the Work Programme draws on the **use of strategic foresight**. This reflects the need for sharper insights on long-term trends and major shifts that are shaping our lives and the future of our economies, environment and societies, and impacting global power structures. This use of foresight could become an important tool to establish multidirectional links which can be addressed in future policy making. However, **the political ambitions that drive the analysis of the strategic foresight must be anchored in the principles of the 2030 Agenda**. By better understanding and anticipating what is on the horizon, we can design and implement policies that help achieve sustainable development. This must be paired with backcasting where EU policymakers define a desirable future and then works backwards to identify policies and programs that will connect that specified future to the present. The sole purpose of this exercise should not be “to help Europe get ahead of the curve” but to safeguard human rights and Sustainable Development globally.

## PART 2: CONCORD suggestions on PC(S)D<sup>4</sup> priorities for 2020

The European Commission initial work programme for 2020 was adopted before the COVID-19 crisis. In order to respond to the crisis, the Commission has reviewed the timing of some of the proposed actions and consequently adjusted its work programme for 2020.

CONCORD welcomes DEVCO’s established practice to screen the European Commission’s work programme to identify PCD priorities for each year. In the context of the annual PCD priority-setting, however, we believe that it would be important to **allow some flexibility in the areas that will receive special attention from a PCSD perspective** (to go beyond the traditional five strategic PCD challenges). For example, the COVID-19 crisis has made it evident that health is an area that should receive further attention from a PCSD perspective in 2020 (and beyond). The recently announced EU4Health programme, for example, should undergo an impact assessment and inter-service consultation. This would ensure that the EU’s attempt to better equip itself for future health challenges does not carry negative impacts on partner countries. Furthermore, **we recommend a clarification on how the the traditional five strategic PCD challenges, the five “P”s of the 2030 Agenda and the new six headline ambitions of the Commission are linked to each other in a context of guiding PCSD priority-setting, monitoring and reporting.**

With the adjusted work programme for 2020 as the basis, **CONCORD has screened the legislative files that the European Commission intends to put forward this year that might have an impact on partner countries.** These should become PC(S)D priorities in 2020. We would like to highlight that it is not simply the process of making them a PC(S)D priority that counts. It is how they will be addressed through proper Impact Assessments and interservice consultations. In other words, how the European Commission intends to ensure that the EU is not undermining partner countries’ abilities to achieve sustainable development. Following the logic of the five strategic PCD challenges, we propose the following:

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<sup>4</sup> CONCORD advocates for Policy Coherence for Sustainable Development (PCSD) but recognises that the EU institutions have a legal mandate to ensure Policy Coherence for Development (PCD) as reinforced by the **Treaty of Lisbon** (2009) and reiterated in the new **European Consensus on Development** (2017).

## 1. Trade

Trade has a special role in the 2030 Agenda as one of the main sources of financing through the furthering of economic growth. Trade has also a specific role with regard to 10 SDG targets<sup>5</sup>. For some (like 2b and 17.12) the EU has done well, for others not. It is time to assess what the EU could do more and better for those targets for which it is underperforming.

The COVID-19 pandemic has caused a serious decline in the global trade volume, estimated by the WTO as between 13% and 32% for 2020 by comparison with 2019. It remains uncertain to what extent trade will bounce back after the end of the pandemic. The pandemic has at the same time revealed many weaknesses in the global trading system - especially with regard to the social dimension. For example, it has become evident that the pandemic is having devastating effects on employment. ILO recently warned that 1.6 billion workers in the informal economy – which is nearly half of the global workforce – stand in immediate danger of having their livelihoods destroyed as a result of COVID-19.<sup>6</sup> Asia and the Pacific have been especially affected, first through a reduction in production and increased trade barriers, and thereafter via reduced global demand, and finally due to restrictions on movement. In Cambodia, Bangladesh and Myanmar, smaller garment factories have closed down because of the pandemic and, as a consequence, getting rid of jobs that were mostly held by women<sup>7</sup>. In Bangladesh, 45 percent of the population is vulnerable to falling into poverty and these garment factories are crucial for providing incomes. How should the EU ensure that its trade policy is fair and sustainable and that it supports partner countries' ability to build up sustainable and resilient economies as a buffer against other macroeconomic shocks in the future?

### - **Trade policy review, including WTO reform initiative (non-legislative Q4 2020)**

In view of the pandemic, Commissioner Hogan has announced that he will review the EU's trade strategy already this year. He has also stated that the world needs more free trade agreements. To make the EU trade policy more sustainable development oriented, the European Commission should start by reforming the trade policy decision-making process through providing more openness, transparency and inclusiveness at all stages of the EU's trade negotiations. In particular the EU should enable/allow more involvement of other stakeholders, including CSOs, also in partner countries, in negotiations. A PCSD assessment of the current trade policy would contribute to a trade strategy that pays more attention to the social impact of trade and trade liberalisation. In view of the protests against the EU-Mercosur agreement such an assessment would also inform an EU trade policy that delivers more on the environmental dimension of PCSD. A sustainable development aligned trade policy should not prioritise the economic dimension over the social and environmental dimension. Instead, sustainable development impact assessments of trade initiatives must better assess possible negative impacts on human rights, social development and the environment. This includes examining what provisions need to be changed in EU trade and investment agreements to build societies that protect

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<sup>5</sup> The concerned SDG targets are: 2b, 2c, 3b, 10b, 14c, 15c, 17.10, 17.11, 17.12

<sup>6</sup> [https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_743036/lang--en/index.htm](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_743036/lang--en/index.htm)

<sup>7</sup> See for example the position note by UNDP "The Social and Economic Impact of COVID-19 in the Asia Pacific region"

human rights, contribute to achieving gender equality, and provide sustainable development, livelihoods and the environment.

The EU must do more to ensure that trade does not contribute to or consolidate practices that have negative social and environmental impacts, including human rights violations, social dumping, child labour, deforestation, environmental degradation, greenhouse emissions, etc.

- **Signature and conclusion of the Agreement between the EU and the countries of Africa, the Caribbean and the Pacific (legislative, Q3 2020)**

The new EU-ACP agreement must clearly set out that social and economic rights, the environment and the climate will take precedence over economic gain, not the other way around. Including language on the promotion of trade in sustainable products and of responsible business conduct does not suffice. Furthermore, the EU must ensure that large companies and economic and social elites in Europe and Africa are not the main beneficiaries of future trade agreements, while informal workers and small producers with inadequate protection of their fundamental rights and weak or inexistent social protection face unfair competition and are unable to make a decent living. The COVID-19 pandemic shows that supporting local food production for local consumption must also be prioritised – while trade deals should not further encourage global value chains for raw commodities, but encourage and enable local transformation instead.

In the context of the EU-Africa strategy, the EU should recognise that the EU and AU have key conflicting interests. For example, it is not clear how Africa can build local, domestic and regional markets and a continental market while EPAs and FTAs have already opened the door for European duty free and quota free imports. The EU must acknowledge that its trade agreements with African countries and regions can stand in the way of enhancing African economic integration and intra-African trade. The EU must therefore not pursue the broadening and deepening of its FTAs and EPAs with Africa without aligning them to the African regional and continental plans. Similarly, the EU-Africa cooperation on trade and investment must aim to increase the industrialisation and diversification of African economies and support the regulatory space of African countries to develop their economic policies and protect and support their small-scale entrepreneurs and farmers. In supporting the African regional and continental trade ambitions, the EU should not lose sight of the social and environmental dimensions and should therefore direct more financial means (including access to credit) to prepare for the increase in competition that Africa's trade liberalisation will inevitably bring.

## 2. Climate Change

CONCORD Europe welcomes the fact that the EU prioritises action to respond to climate change and environmental degradation. We however encourage the EU to continue broadening its narratives and approaches and **adopt a more holistic context analysis and response to climate change and environmental degradation** that integrates strong social and human perspectives and dimensions. The European Green Deal's potential to become truly transformative, for example, depends on whether or not it takes a systemic approach. This means that it needs to be aware of the global context in which it will be implemented. Therefore, any initiative that is put forward as part of the European Green

Deal package must take into account the impact it might have on our partner countries. This is not the same as making sure that the European Green Deal is coherent with other political initiatives within the EU. All European Green Deal initiatives and legislation should therefore undergo impact assessments and inter-service consultations **with a special focus on the potential impact these initiatives might have on partner countries**, in order to respect the PCD commitment. This includes, for example, the implementation of the EU's Communication on Stepping up EU Action to Protect and Restore the World's Forests and the possible carbon border adjustment tax, which could impact domestic resources and exports in the Global South.

In the context of designing EU development cooperation projects and programmes under the EU's single external instrument (NDICI), the EU must conduct environmental and climate screenings (encompassing mitigation and adaptation) and a rights-based assessment for any programmes financed under NDICI in order to avoid any harmful activities such as fossil fuel production, overfishing, unsustainable animal farming, industrial agribusiness, or commodity production/imports which cause deforestation, biodiversity loss or land and water grabs. This is needed to respect the 100% climate-proofed commitment and the 'do no harm' principle.

### 3. Food Security

On 20 May, the European Commission adopted its Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system to enable the transition to a EU food system that is aligned with sustainable development and that safeguards food security and ensures access to healthy diets. The EU Green Deal and the Farm to Fork Strategy must, however, take serious steps towards full policy coherence for sustainable development covering trade, agriculture, food, environment and climate policies and laws. It must take into account its impact on partner countries, especially on small-scale farmers, of whom women are the majority. The challenge is also to ensure that commitments taken in the Green Deal, Farm to Fork and Biodiversity Strategy are translated into enforceable targets in the National Strategic Plans of the Common Agricultural Policy.

#### - [Signature and conclusion of the Agreement between the EU and the countries of Africa, the Caribbean and the Pacific \(legislative, Q3 2020\)](#)

Agriculture is a major sector of sustainable development employing more than 50% of the workforce in Africa. It is clearly key to food and nutrition security. The final EU-Africa Strategy must support diversified, ecologically and socially sustainable and nutritious food systems, in particular those based on agroecology, and support small-scale food producers, many of whom are women in African countries. This may require the revision of trade agreements between the EU and African countries and regions in order to ensure that imports from Europe do not undermine rural development and agriculture or creates unfair competition in the form of for example dumping.

### 4. Migration

Effective and human rights based migration governance aligned with the principles of sustainable development remains a key challenge for the EU. Migration continues to dominate the policy cycle and it is a top political priority for EU Member States as well as

for several partner countries. Migration and migration policy have long been identified as key PC(S)D priorities by the European Commission, but PCSD mainstreaming in this policy area has been limited. There are several policy (and potentially legislative) documents on migration to appear in 2020.

- **A New Pact on Migration and Asylum and accompanying legal proposals (Q2 2020)**

A New Pact on Migration and Asylum, where “the internal and external aspects of migration are inextricably linked” will be released in the second quarter of 2020. The new EU strategy for migration and migrants, must have a truly human rights based approach, guided by the “Action Plan on Human Rights and Democracy” and apply a PCSD approach. It must also be linked with the 2030 Agenda principles of leaving no one behind and reaching the furthest behind first, including the different components of the 2030 Agenda specifically linked with migration.

- **Signature and conclusion of the Agreement between the EU and the countries of Africa, the Caribbean and the Pacific (Q3 2020)**

The EU and its Member States should specify their commitment to refrain from engaging in policies and practices that exacerbate forced displacement and that compromise sustainable development in Africa (e.g. fiscal policy, arms trade, etc.). From a PCSD perspective, and with a view to contributing to sustainable development of countries *outside* of Europe, EU external migration policies should ensure that European Official Development Assistance (ODA) is used solely to tackle the root causes of poverty and the drivers of forced displacement, not to curb migration flows. ODA should furthermore be allocated to countries based on recipients’ needs and development strategies rather than on the EU’s migration foreign policy objectives. In addition, there should be no migration management conditionalities linked to disbursement of ODA.

