

# Joint Synthesis Report – CONCORD responses to the stakeholder consultation

September 2018

## 1. The European Consensus on Development aims to foster stronger, more inclusive multi-stakeholder partnerships. How would you assess the success of the EU and Member States' cooperation with relevant stakeholders in contributing to the achievement of the SDGs through development cooperation?

It is very **early to judge** whether the new Development Consensus has made a difference to the formation of inclusive multi-stakeholder partnerships. There is however certainly an increased focus on **partnerships with the private sector** to deliver sustainable development, but these are not generally intended to be multi-stakeholder. The Consensus encourages and supports an increasing role for the private sector and large corporations. While it is necessary to engage the private sector in development, this engagement should come with clear safeguards and concrete criteria, especially since there is insufficient evidence of the development benefits of private sector engagement and insufficient analysis of the associated risks. There is also a lack of transparency around partnerships with the private sector, insufficient monitoring and redress mechanisms in cases of human rights violations particularly indigenous land rights violations and environmental damage. CONCORD strongly recommends the EU to abandon the 'one-size fits all' approach to the private sector in development and focus on micro, small and medium enterprises (MSMEs) and social economy enterprises.

Despite strong recognition in the Consensus of the diverse roles of **civil society and the importance of CSO space**, it did not spell out how to do that and in which areas. Time and again, civil society has to step up to prove its role in dialogue, programming (whether just to inform programming or to implement it), and in monitoring and evaluation (watchdog role). Occasions such as the November 2017 EU-Africa Summit where civil society was barred from speaking painfully demonstrated how the EU needs to step up its defence of CSO space. The EU must do more to concretise its commitment to **strengthening a pluralistic, inclusive and diverse local civil society**, supporting democracy and human rights defenders, including women's rights defenders, and protecting and expanding civic space. This engagement with citizens, including at subnational level, should be done to define development priorities, monitor progress and hold governments and other duty bearers accountable, eg using social accountability and participatory monitoring approaches.

The latest report from CONCORD looking at the impact of the EU Gender Action Plan demonstrates that CSOs are hardly consulted, despite having very relevant knowledge and interest in EU leadership and coordination.<sup>1</sup> **Women's and women's organisations' participation** is often treated as an afterthought or an assumed outcome of community engagement efforts whereas it should be systematically included in consultations via targeted outreach. Strong liaison between CSO and gender focal points in the EU Delegation and Member State embassies is key in this regard.

In addition to an important role to strengthening the voice of civil society, **funding to civil society** should be stepped up throughout all instruments and programmes (both thematic and geographic) to recognise and support the multidimensional role of CSOs as political actors and development project implementers, often providing services and information to the most marginalised groups. With regarding multi-stakeholder partnerships, we see that there is intent, for example, in the 2018-2020 MIP of the Global Public Goods and Challenges Programme to increase support but it is too early to assess the impact.

We believe a major note of caution is needed regarding **multi-stakeholder platforms**: while they can be very useful spaces to exchange views and understand everyone's stance on specific issues, they can only operate effectively if freedom of speech, freedom of opinion and the space and political support for civil society is guaranteed. In addition, careful attention must be paid to power dynamics in such spaces, because if that's not the case, such platforms may become empty shells legitimating the position and interests of the most powerful actors taking part in those settings.

## 2. What are your general views on how the EU and its Member States approach the 2030 Agenda as a whole in their development cooperation? Are SDGs sufficiently addressed? Are there important gaps?

We believe the 2030 Agenda should precisely not only be addressed in the development cooperation, but implies **deep changes in other policies** - as outlined in CONCORD's report '*Sustainable Development - The stakes couldn't be higher*'.<sup>2</sup> We acknowledge that attempts have been made to initiate some processes to make private finance more sustainable, to take into account social and environmental concerns in the framework of the proposed reform

<sup>1</sup> <https://concordeurope.org/2018/09/19/gender-action-plan-two-report/>

<sup>2</sup> <https://concordeurope.org/2016/11/16/sustainable-development-report-2016/>

of the Common Agricultural Policy, or to address the negative impacts of insufficiently regulated international trade on human and women's rights and the environment. But the deep shifts urgently required are still far away. Governments of Member States and high level EU officials still seem to find it difficult to embrace and advocate for the **radical transformation** that we urgently need. Looking at the Commission proposals for the next Multiannual Financial Framework, we don't believe the SDGs are sufficiently addressed.

In addition, other policy areas, such as the **EU migration policy** focusing on border control and return of migrants, have blatantly contradicted not only Agenda 2030, but the international human rights obligations of our countries and the values on which the European Union has been built. We strongly believe that migration and development are interlinked but the causal relationship is complex. In the spirit of the 2030 Agenda and the Consensus on Development, emphasis should be put on creating peace, stability, protection, human rights and democracy as well as opportunities and wellbeing for for anyone, regardless whether they are on the move or not. Further, the EU and its Member States should invest in leveraging migration in all its forms as a catalysator for development, in line with the European Commission's Communication on protracted displacement ('Lives in Dignity'), and other measures such as lowering the cost of remittances, supporting the development of regional mobility schemes.

As far as the **EU development policy** is concerned, we think the implementation of the European Consensus on Development - the EU's development policy response to the 2030 Agenda - is advancing in some but insufficiently in other important areas.

We were very disappointed with the absence of any reference to **inequality** in the review of **Aid for Trade (AfT)**, which represents a third of EU ODA. This in spite of the fact that inequality is a red thread in the new Consensus for development. We would suggest to ensure reporting about Aid for Trade includes a much **stronger focus on the environmental and social dimensions** – including the pro-poor focus and inequality indicators covering all countries. There should be clarity about how much emphasis will be put on supporting regional and domestic trade as opposed to export oriented production. Aid for Trade should assertively support the removal of the obstacle to **women's economic empowerment**: the lack of redistribution of unpaid care work through public services and access of women to productive resources (including land, something that is highlighted in the new AfT strategy).

When it comes to **gender equality**, the EU has taken strong gender commitments in the Consensus, and these are taken seriously both in terms of policy and increasingly in terms of funding (on basis of OECD gender marker). However, there should be a lot more attention to evaluate impact, rather than only the implementation of the EU Gender Action Plan, to ensure there are positives changes in the daily lives of people we are aiming to assist. Much more could be achieved if gender would be better included in political dialogue beyond social sectors only, in particular in trade, infrastructure and energy negotiations.<sup>3</sup> The EU should play an active role in bringing about the transformation of gender relations, using its position to influence partner government and to coordinate with partners. Moreover, in order to make sure that targeted action gets the needed resources, in addition to the existing commitment of having 85% of the EU's ODA having gender equality as a significant or principal objective, 20% of EU ODA should have gender equality as a principal objective (gender marker 2). Lastly, there is also a need for gender budgeting throughout the EU external instruments and to allow implementing partners to budget for gender mainstreaming, as impactful gender mainstreaming implies a cost.

With regard to the EU's contribution to financing the SDGs and achieving them in partner countries, EU institutions and Members States should ensure more regular monitoring and reporting on progress to realise the **Addis Ababa Action Agenda (AAAA)**. They should also present a strategy for how the EU intends to realise the AAAA in order to achieve the SDGs by 2030. In the next monitoring report, the European Commission should take a more holistic look at the AAAA, and strengthen its focus on the democratic global governance of tax and of debt management, on country-by-country reporting and more binding rules and regulations on sustainable business practices as these aspects are key to reducing financial irresponsibility, inequalities and human rights abuses.

The **EU's External Investment Plan** constitutes one of the Commission's answers to implementing the SDGs, but the EFSD has not yet been evaluated, and there is no guarantee of its ability to deliver development impact. Before moving forward with a new EFSD+, an evaluation of the existing EFSD should be carried out, and this type of modality should only be expended if and where it brings development additionality and contributes to the overarching aim of leaving no-one behind. It is important to apply strong standards to blended finance and guarantees to make sure development additionality is assessed and demonstrable, ensuring that development effectiveness principles are respected, risks to people's rights and livelihoods and the environment are effectively minimised, that women's and girls' rights, economic opportunities and decent work creation for all are effectively promoted, that public sector and public goods are not undermined, but rather strengthened, and that debt sustainability and accountability are always factored in when designing new financing mechanisms.

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<sup>3</sup> <https://concordeurope.org/2018/09/19/gender-action-plan-two-report/>

The EU has made strong commitments to fight **climate change** in the Paris agreement and in the Consensus. But to really limit global warming to 1.5 degrees and reach the 17 SDGs, implementation needs to be speeded up substantially. Apart from much increased mitigation within Europe and encouraging partner countries to reduce emission, there needs to be a massive scale up of climate action and financial support to developing countries, in order to increase adaptive capacity of vulnerable people and communities and increase access to on and off-grid renewable energy. The EU should also play a stronger role in providing finance for loss and damage to poor countries. Another area for improvement is in terms of consistency and transparency in reporting on global financial commitments for example for **climate change and biodiversity** under the UNFCCC and the Convention on Biological Diversity (CBD). The use of Rio Markers for measuring interventions towards climate related support is not consistent across EU Member States and institutions. The EU has a commitment to double international biodiversity related finance by 2015 and maintain that level.

**3. Based on your experience, can you briefly describe up to three development projects or programmes funded by the EU and/or its Member States which you see as positive examples of how the SDGs are put into practice, and explain why they are successful, also indicating which SDG(s) are being addressed by the projects?**

As European Confederation for Relief and Development, we cannot select 3 projects from the many good projects our members are involved in. We will instead use the space to elaborate a bit more our responses to some of the other questions.

**4. Could you highlight some areas for improvement for development projects and programmes financed by the EU and/or its Member States in terms of how they support the achievement of the SDGs in partner countries?**

Development projects should look more specifically at impacts on inequalities, including women's rights. The EU, including Member States, needs to focus more on **human rights and changing social norms**, attitudes and behaviours. For example, a universal right to health cannot be achieved through direct services alone. Large scale and sustainable change requires that we address underlying and systemic factors, including gender inequality, policy barriers and power imbalances that have an impact on health. It also depends on domestic resource mobilisation which more should be done about. It's an issue relevant for many of the SDGs, but too little attention is paid to that in EU development cooperation, as also recognised in the 2016 annual report on the EU Gender Action Plan, and reconfirmed in the 2018 CONCORD report on the impact of the EU GAP. Without that, we risk failing the SDG implementation on a number of fronts. For example the economic empowerment of women is more than economic advancement, it requires looking at the voice, agency and control that women have to make their own decisions, which is very much about changing norms, and which is crucial to break the cycle of inequality and poverty. Reporting to the Gender Action Plan shows that for many EUDs, addressing **gender equality** is primarily tackling gender-based violence (primary objective chosen as priority area by far), however many other aspects of gender equality as they relate to SDGs remain often not addressed. This is an example of the fact that the "leave no one behind approach" and a focus on inequalities throughout all EU work, which would enable to the realisation of the SDGs, is not yet being implemented.

Also the '**leave no one behind agenda**' (LNOB) in practice has assumed a very narrow focus i.e limited to gender equality and to people living with disabilities. There is a complete absence in discussions and also in this paper a focus on the 'farthest left behind' - minorities both religious and social, indigenous people and particularly older people, etc. If they are to be really committed to the agenda of LNOB, then the EU needs to go beyond gender inequality and look at all forms of inequality and the intersection of excluding factors. The implementation of the Leave No One Behind principle should be operationalised and also tracked/monitored to ensure that ODA allocations are indeed contributing to sustainable development and poverty eradication (including for example, but not exclusively, tracking ODA spendings related to gender, disabilities, elderly and other vulnerable groups).

The Consensus brings a new shift with an inclusion of persons with disabilities and a policy effort to implement and monitor the United Nations Convention on the **Rights of Persons with Disabilities** (CRPD)<sup>4</sup> and makes specific reference to mainstreaming the rights and inclusion of persons with disabilities. However, data disaggregation by disability is a gap and not in line with the SDGs where it is clearly stated that the "indicators should be disaggregated, where relevant, by income, sex, age, race, ethnicity, migratory status, disability and geographic location".<sup>5</sup> Data is vital to include persons with disabilities or they will remain at risk of being left behind and invisible in international cooperation programmes.

Criteria for engagement with and allocation of funds between regions and countries must be fair, objective and based on the needs of poor people in partner countries, focusing on LDCs. The planning and programming phases as well as the delivery mechanisms should guarantee the **aid effectiveness principles** together with accountability

<sup>4</sup> <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx>

<sup>5</sup> [https://unstats.un.org/sdgs/indicators/Official Revised List of global SDG indicators.pdf](https://unstats.un.org/sdgs/indicators/Official%20Revised%20List%20of%20global%20SDG%20indicators.pdf)



and transparency. Aid allocation should not be dependent on **migration** deals with the EU. Furthermore, there should be no diversion of finance from poor countries and regions to migrants' countries of origin or of transit to Europe, on the sole basis that they are on the migration route.

Development cooperation should be sensitive to but not dictated by **security** concerns. The fact that security serves development (and vice versa) does not imply that all measures relating to security in third countries should be funded out of ODA. If peace and security-related activities are funded through development aid, human security and the protection of civilians should always be prioritised over state security. This implies investing more resources in conflict prevention, disaster preparedness, local peacebuilding and responding to early-warning systems by taking action early in the face of both conflicts and natural disasters.

There should be a healthy level of attention to the role of the **private sector** development, along the lines of CONCORD's 10 point roadmap for 10 areas of action.<sup>6</sup> The UN Guiding Principles (UNGPs) have put forward human rights due diligence (HRDD) as the principal tool that business enterprises should use to identify the potential and existing human rights and environmental risks related to their activities and business relationships, and to set out the necessary steps for prevention and accountability. Human rights due diligence should be implemented by all companies, no matter what sector or size. For business to realise its full contribution to sustainable development, it must put efforts to advance respect for human rights at the heart of its strategy. CONCORD therefore demands that the application of the UNGPs are mandatory for companies involved in EU programmes. The EU should also establish rigorous standards, e.g. on sustainability and human rights, to better regulate the use of aid in private sector investments, and to ensure that development goals are not undermined by commercial motivations.

Funds currently allocated to sustainable development and/or poverty eradication should not be diverted to other priorities and, given the importance attributed to achieving the Agenda 2030, should rather be increased for the future. Therefore, the EU and its Member States should present strategies how to reach the **0.7% of GNI on ODA target** on time, to avoid dropping levels of total ODA and review also the use of ODA for domestic purposes. Also members to keep this commitment separate from security priorities.

The EU and its Member States should furthermore realise the commitment to spend 0.15-0.20% of GNI on **LDCs** and develop an action plan on how to step up EU efforts to reach this target on time. In this context, the 0.15-0.2%/GNI target needs to be safeguarded and the EU should formulate clear criteria to justify the allocation of ODA funds to other country categories than those most in need.

**5. One of the objectives of the European Consensus on Development is to support the achievement of the SDGs by partner countries through an enhanced commitment to Policy Coherence for Development as an important contribution to the broader objective of Policy Coherence for Sustainable Development (PCSD). Do you believe the EU and its Member States have taken this approach into consideration in recent years and could you give some concrete examples (positive and negative)?**

Given how essential PCSD is for achieving sustainable development, CONCORD believes special attention should be paid to how it is being integrated in monitoring, accountability and review frameworks at national and EU level. The single global indicator for Target 17.14 currently stands as "number of countries with mechanisms in place to enhance policy coherence for sustainable development". This is at the same time both very vague and too narrow, and does not allow for adequate monitoring on policy coherence for sustainable development. PCSD monitoring should be more extensive and should adopt a range of different approaches. It should involve statistical data illustrating how, for example, the EU has succeeded in decoupling its own sustainable development from the negative impacts in third countries, or from global challenges such as climate change. Or whether EU agriculture and trade policies have resulted in less dumping of EU agricultural products on developing countries, or its total elimination. This kind of statistical analysis should be complemented by a qualitative analysis of the use of PCSD mechanisms, or of impacts on human rights. Civil society can play a crucial role here by raising the voices of rights holders, especially from among the most marginalised groups.

Further work is needed to ensure that **sustainability chapters in trade agreements** are fundamental and enforceable elements of the agreements and not just seen as "nice to have." The commitment to and implementation of PCSD by individual Member States varies widely.<sup>7</sup>

A positive example of tackling policy coherence for development is demonstrated in the **EU Timber Regulation** to complement support for Forest Law Enforcement, Governance and Trade in developing countries.

The introduction by the EU of regulations on **illegal, unreported and unregulated fishing** (IUU) potentially address loss of livelihoods and revenue in coastal and fishing communities as well as depletion of fish stocks, illegal trade

<sup>6</sup> <https://concordeurope.org/wp-content/uploads/2017/10/Private-sector-2017-online-final.pdf?c676e3&c676e3>

<sup>7</sup> See more concrete examples in CONCORD's responses to the public consultation to feed into the PCSD evaluation.

and corruption. However, IUU regulations are not comprehensive in that they do not cover human rights and slave labour and their implementation is currently undermined by use of the weakest port of entry.

Still major incoherencies exist such as continued subsidies to **fossil fuels** in the EU which further contribute to global carbon emissions and the lack of regulation to address the import and consumption of commodities which drive deforestation and land grabbing.<sup>8</sup>

**Gender equality** still needs to be better tackled in the context of Policy Coherence for Sustainable Development and in particular attention be given to whether there are unintended consequences of other EU policies; whether there are gender-blind sectors, programmes and projects; and whether GAP II is having an impact in sectors such as energy, climate change and trade. Impact Assessments need to include analysis of gendered impact as well as impact on partner countries, and these should be considered in an integrated fashion, not separately. The integration of gender equality in political dialogues is also key to ensure PCSD is gender-responsive. Finally, the involvement of various stakeholders including in particular CSOs and women's organizations is key to inform this process.<sup>9</sup>

**6. The European Consensus on Development underlines the need to address the interlinkages between the different SDGs through integrated actions that can create co-benefits and meet multiple objectives in a coherent way, as well as address trade-offs effectively. Do you have examples of how the EU and its Member States have been able to address such interlinkages in their development policy?**

The food-water-energy nexus in Tanzania's East Usambara Mountains which also includes building climate resilience and support for sustainable agriculture.<sup>10</sup>

Access to sustainable energy for all provides energy for education, health, households, businesses and at the same time progresses low carbon development. A particular programme of WWF and Barefoot College entails training of women as solar engineers to provide affordable access to electricity in their rural communities thus also supporting women's empowerment, decent work and reducing dependence on forests for traditional energy.<sup>11</sup>

Sustainable energy and water management in Myanmar: Through the EU Asia Switch programme, a project in Myanmar, supports 600 SMEs in the most polluting sectors of the food and beverage industry to invest in green technologies, including sustainable energy and water management. This project will contribute to Myanmar's efforts of transitioning towards a green economy and future sustainability of SMEs in this sector is critical for long term economic prosperity, environmental sustainability and food security in the country.<sup>12</sup>

**7. Do you have any other suggestions for content or key messages in the Joint Synthesis Report?**

For what we would like to read in the report, CONCORD would suggest to recommend a report structure which

- details the EU's contribution to reaching the Agenda 2030 core principles (human rights, leave no one behind, PCSD, etc.)
- details the EU's contribution to reaching each of the 17 SDGs, esp. highlighting cross-cutting issues and trade-offs
- details the EU development project and program funding policy and how it contributes or hinders the support of poorer countries and the most marginalised groups to reach the SDGs
- highlights not only successes but also explicitly points out short-comings and rooms for improvements
- specifically elaborates whether and how the EU's internal policies (agriculture, energy, mobility etc.) contribute to reaching the SDGs in poorer countries and the most marginalised groups
- points out when the EU will present and implement a coherent implementation strategy for the Agenda 2030 (i.e. sustainability strategy or something similar)

<sup>8</sup> See more detailed responses in the WWF submission to the Commission's evaluation of PCD 2009-16

<sup>9</sup> [https://ec.europa.eu/europeaid/case-studies/eco-villagers-tanzania-embrace-new-crops-adapt-warmer-temperatures\\_en](https://ec.europa.eu/europeaid/case-studies/eco-villagers-tanzania-embrace-new-crops-adapt-warmer-temperatures_en)

<sup>10</sup> <https://concordeurope.org/2018/09/19/gender-action-plan-two-report/>

<sup>11</sup> <http://www.wwf.eu/?257523/Women-of-light-bringing-solar-energy-to-rural-Africa>

<sup>12</sup> [http://www.wwf.eu/what\\_we\\_do/sustainable\\_development/eu\\_funded\\_projects/](http://www.wwf.eu/what_we_do/sustainable_development/eu_funded_projects/)

