

WORKSHOP

Requested by the DEVE committee



Workshop

Enhancing policy coherence for development



Author:

Ondřej HORKÝ-HLUCHÁŇ, Institute of International Relations Prague

European Parliament coordinator:

Policy Department for External Relations

Directorate General for External Policies of the Union

PE 702.571 - November 2022



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WORKSHOP

Enhancing policy coherence for development

ABSTRACT

The principle of Policy Coherence for Development (PCD) is a central pillar of the EU's efforts to enhance the effectiveness of development cooperation. It represents both a legal and a political commitment for the EU institutions and the Member States.

This report includes an in-depth analysis on PCD and the summary of the debate held during a workshop on the same topic, which brought together MEPs, representatives of EU and international organisations and civil society.

The workshop aimed to take stock of the latest developments in the application of PCD and sought to generate ideas for improvement. Although several policy prescriptions on PCD already exist as part of legal provisions and different tools have been put in place, there is a continued mismatch between the ideal and practical implementation of PCD.

The discussions were organised in two successive sessions: a first panel focused on the conceptual PCD approaches rooted in legal provisions and policy strategies. The experts debated the understanding of PCD from the perspective of different international actors - the EU, OECD, UN - and its significance for meaningful policy impact in developing countries within the framework of Agenda 2030.

A second panel explored challenges and gaps in PCD implementation. The discussion also focused on the importance of maximising synergies between policy areas in PCD implementation and of performing impact assessments that capture the effects on developing countries for all EU policies.

AUTHORS

- In-depth analysis on 'Ensuring transparent and impactful Policy Coherence for Development':
 - Ondřej HORKÝ-HLUCHÁŇ, Senior Researcher, Institute of International Relations Prague, Czechia. With the assistance of Clara BURRY, Intern, Institute of International Relations Prague, Czechia
- Workshop report:
 - Inge BRIJS, Policy Department for External Relations, European Parliament
 - Amelia PADURARIU, Policy Department for External Relations, European Parliament

PROJECT COORDINATOR (CONTRACTOR)

- Trans European Policy Studies Association (TEPSA)

This study was originally requested by the European Parliament's Committee on Development (DEVE)

The content of this document is the sole responsibility of the authors, and any opinions expressed herein do not necessarily represent the official position of the European Parliament.

CONTACTS IN THE EUROPEAN PARLIAMENT

Coordination: Amelia PADURARIU, Policy Department for External Relations

Editorial assistant: Daniela ADORNA DIAZ

Feedback is welcome. Please write to amelia.padurariu@europarl.europa.eu

To obtain copies, please send a request to poldep-expo@europarl.europa.eu

VERSION

English-language manuscript completed 18 November 2022

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I. In-depth analysis

IN-DEPTH ANALYSIS

Ensuring transparent and impactful policy coherence for development

ABSTRACT

The European Union (EU) has a treaty obligation to monitor how its policies are impacting developing countries, known as Policy Coherence for Development (PCD), which remains extremely relevant in the new geopolitical setting and sustainable development framework. While mainstreaming the United Nations' 2030 Agenda implicitly raised awareness about policy integration throughout the European Commission (EC) and the European External Action Service (EEAS), implementation of the European Green Deal has created new risks which could lead to negative social and economic impacts from EU policies in the global South being overlooked. Accordingly, the EU must institutionalise its political commitment to a transparent and impactful PCD by transparently identifying priorities, setting targets and undertaking their evaluation. This analysis confirms previous evaluation findings and reveals that technical mechanisms for assessing policy effects are in place at EC level. However, weak political commitment combined with decreased capacities and dispersed policy coordination within the Directorate-General for International Partnerships limits their use. EU Delegations' involvement in monitoring impacts remains uneven and furthermore stakeholders' participation in PCD remains inadequate to keep up with proposed policy changes. Hence, the EC and EEAS coordination should be increased, formalised and supported by the European Parliament, the Council of the EU and the Member States.

Author

Ondřej HORKÝ-HLUCHÁŇ, Institute of International Relations Prague
November 2022

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List of abbreviations

AFCO	Committee on Constitutional Affairs
BR	Better Regulation
CBAM	Carbon Border Adjustment Mechanism initiative
CODEV-PI	Working Party on Development Cooperation and International Partnerships
CSO	Civil society organisation
DEVE	Committee on Development
DG ENV	Directorate-General for the Environment
DG INTPA	Directorate-General for International Partnerships
EC	European Commission
EEAS	European External Action Service
EGD	European Green Deal
EP	European Parliament
EPRS	European Parliamentary Research Service
EU	European Union
EUD	European Union Delegations
HLPF	High Level Political Forum on Sustainable Development
IA	Impact Assessment
ISC	Inter-Service Consultation
LDC	Least Developed Countries
MEP	Member of the European Parliament
NDICI – Global Europe	Neighbourhood, Development & International Cooperation Instrument – Global Europe
OECD	Organisation for Economic Co-operation and Development
PCD	Policy Coherence for Development
PCSD	Policy Coherence for Sustainable Development
SDG	Sustainable Development Goal
SDT	Sustainable Development Target
SEC GEN	Secretariat-General
SIA	Sustainability Impact Assessment
TFEU	Treaty on the Functioning of the European Union
UN	United Nations
UNEP	United Nations Environment Programme

Executive summary

The European Union's (EU) legal obligation to take account of development policy objectives alongside its other policies has formed part of EU treaties for the past thirty years or so. Over time, mechanisms to promote the related concept of Policy Coherence for Development (PCD) have been developed, yet the political commitment and capacities to implement PCD across all policies systematically have lagged behind the available technical tools and administrative mechanisms. This has restricted policy deliberation between diverse and equally legitimate values and interests, thereby resulting in limited PCD implementation.

More recently, the United Nations 2030 Agenda, the Sustainable Development Goals (SDGs) and the European Green Deal (EGD) rekindled a political commitment to policy integration ('breaking the silos'), sustainable development and the external dimension of EU policies. This has had a positive effect on *implicit* PCD implementation by including sustainability issues in traditional policies with external impacts such as trade.

However, during the transition period from a traditional international development framework to a global sustainable development framework, the *explicit* implementation of PCD as a policy was seen to decline especially within the European Commission (EC) and the Council of the EU. Among these actors, this in-depth analysis did not register any sustained improvements to PCD since an external evaluation commissioned by the EC. This extensive evaluation published in 2018 acknowledged the EU's leading role in promoting PCD globally but it failed to find evidence of PCD having 'trickled down' to the selected EU policies that affect partner countries.

Some progress was registered with the introduction of Better Regulation by the Commission's Secretariat-General (SEC GEN). Recently, Better Regulation has become more binding in the area of SDGs mainstreaming than PCD mainstreaming but as yet it is too early for its evaluation due to the current lack of completed assessments. The European External Action Service has mostly focused on adapting development cooperation to situations created by the EU's policy impacts. However, any explicit involvement of EU Delegations (EUDs) in PCD implementation did not extend beyond limited annual training and reporting. There was no follow-up planning process.

The European Parliament and its Committee on Development (DEVE) have been more active by introducing PCD perspectives into the relevant initiatives, yet even this development has been unable to prevent the EC's failure to apply PCD to all relevant impact assessments and the related interservice consultations systematically. The dispersion of the PCD focus on more general procedures within the Directorate-General for International Partnerships (DG INTPA) coupled with the unavailability of formal documents recording PCD processes do not allow for a full and fair assessment of processes within the DG and EUDs. The Commission's public reporting is mostly descriptive and it is impossible to quantify the effectiveness of PCD against internal objectives due to the absence of clear targets and transparent monitoring.

Case studies on trade, climate and deforestation suggest that despite increased mainstreaming of sustainable development issues into EU external action, any strong political will for implementation of the EGD, which is mainly motivated by environmental and climate concerns, poses risks in light of economic and social impacts, particularly for people in the lower strata of society living in poorer partner countries. At times, PCD coordination between the EU's Headquarters and its Delegations may also be insufficient to create synergies and mobilise development cooperation, not only in building capacities but also in making good use of any opportunities created by EU policies, especially in countries with limited government capacity.

This in-depth analysis considered gaps between a state-of-the-art comprehensive model of PCD, adapted from the Organisation for Economic Co-operation and Development's (OECD) model of eight building blocks for Policy Coherence for Sustainable Development (PCSD), and the dynamics within and between different European institutions and their stakeholders. 10 principal, interrelated recommendations from this in-depth analysis to various institutional actors can be summarised as follows:

1. **Institutionalise the EU's commitment to a transparent, impactful and participative PCD** as an expression of the promise to 'leave no one behind', following the main principles of Better Regulation and by strictly applying the 'do no harm' principle to the world's poor.
2. **Contribute to a new EU Sustainable Development strategy having established renewed political commitment to PCD**, preferably in a joint statement by the EC, the European External Action Service, the EP and the Council of the EU.
3. **Restore the PCD team and centralise PCD coordination at DG INTPA** by assigning it sufficient capacities to become a centre for policy coordination, training and awareness raising.
4. **Set up a transparent system of planning, monitoring and reporting PCD at DG INTPA, directly involving EUDs** to prevent negative effects of policy changes planned by the EU, with a particular focus on policy initiatives of the EGD.
5. Explicitly add PCD to the Interservice Group's mission on Sustainable Development Goals as a regular coordination body between different EC's directorates.
6. **Add PCD to a participative policy dialogue with partner countries at EUDs** and include capacity building for both the governmental and non-governmental stakeholders to assess impact of the EU's policies in joint programming.
7. **Renew PCD involvement amongst EU Member States** in the Council of the EU and with EUDs and create complementarity of labour on the PCD and PCSD agendas.
8. **Strengthen oversight by the EP's DEVE committee and its PCD rapporteur** of scrutinised initiatives assigned to other committees and feed it with information from inter-parliamentary bodies and other stakeholders.
9. **Initiate a triologue between the EU, the OECD and the United Nations** on PCD and PCSD as a starting point for reforming the institutions of global governance to tackle policy incoherencies.
10. **Make use of PCD processes and outcomes to improve partner countries' perception of the EU** via public diplomacy for promoting global collective action in a changing geopolitical context.

'Policy coherence does not only apply at the internal level, but also to the impact of internal policies on the external dimension, and vice-versa. We must make sure not to export our ecological footprint or create poverty, inequality and instability in other parts of the world. As Europeans we are patently aware that negative impacts elsewhere will in turn have a boomerang effect on our own economy and society [...]'¹.

European Commission: Towards a Sustainable Europe by 2030

¹ European Commission, [Towards a Sustainable Europe by 2030](#), Reflection Paper, COM(2019) 22, 30 January 2019, p. 29.

1 Introduction

1.1 A test of the EU's governance of sustainable development

The legal obligation of the European Union (EU) to ensure Policy Coherence for Development (PCD) has been anchored in successive treaties for three decades². Article 208 of the Treaty on the Functioning of the European Union (TFEU) stipulates 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'³. These objectives include primarily 'the reduction and, in the long term, the eradication of poverty'⁴.

Yet, there is distance between a single treaty article to a well-documented list of positive impacts on billions of women, men and children from developing countries living in the extremely diverse contexts of interconnectedness and vulnerability. The explicit political and administrative procedures to convert PCD into practice were put in place only with the advent of the Millennium Development Goals and the first European Consensus on Development in the mid-2000s⁵.

A decade later, with the introduction of the Sustainable Development Goals (SDGs), a new overarching concept of Policy Coherence for Sustainable Development (PCSD) seemed to overshadow the original focus of PCD on the trans-boundary effects of EU policies in the global South. PCD risked becoming lost amidst various dimensions within the multi-layered global governance of sustainable development.

The legal foundation of PCD in the EU Treaty and the path-dependency for European institutions became good 'ratchets' against this backslide. However, in spite of the EU's global leadership in raising awareness and creating mechanisms to promote PCD, there has been no officially documented evidence that policy coherence increased *because of* the EU's intentional policy, as the European Commission (EC) acknowledged after an extensive external evaluation of the policy published in 2018⁶.

Most respondents interviewed for this study acknowledge at the same time, though, that since 2015 the SDG's advent *has* translated into the mainstreaming of sustainability and higher attention to the external effects of EU policies throughout the European institutions. The recent crises, especially the war in Ukraine, may have temporarily slowed down implementation but not the political will to carry out the new, deeply transformative policy initiatives of the European Green Deal (EGD).

In these circumstances, it could appear that PCD may become superfluous and divert attention from the straightforward EGD implementation as a seemingly sustainable and coherent agenda by definition. Yet, the EGD has a geopolitical dimension and energy transition alone 'will adversely affect a number of regional partners, and may even destabilise them economically and politically'⁷.

But the 'traditional' areas of policy incoherence do not disappear. The New European Consensus on Development from 2017 has rightly pointed out that PCD should be applied 'across all policies and all areas

² The author is thankful to all the anonymised interviewees, officials from the European institutions, OECD, UN and diplomats from the EU and its Member States, who contributed with their invaluable insight, information and opinion. All people at the DEVE Committee and the Trans European Policy Studies Association (TEPSA) have also been extremely helpful and supportive during the whole research process. Lastly, valuable comments by the TEPSA's academic reviewer helped to substantially improve the quality and readability of the study.

³ European Union, [Consolidated Version of the Treaty on European Union](#), OJ C 202, Official Journal of the European Union, 7 June 2016, p. 141.

⁴ Ibid.

⁵ Carbone, M., '[Mission Impossible: The European Union and Policy Coherence for Development](#)', *Journal of European Integration*, Vol 30, No 3, 2008, pp. 332.

⁶ European Commission, [Evaluation of the EU Policy Coherence for Development](#), Staff Working Document, SWD(2019) 88 Final, 26 February 2019, p. 26.

⁷ M. Leonard, et al., '[The geopolitics of the European Green Deal](#)', Policy Contribution, Brugel, No 4/21, February 2021, pp 1-23.

covered by the 2030 Agenda⁸. Policies that positively or negatively affect the most intense cross-boundary flows between the EU and developing countries immediately spring to mind, such as: trade of goods and services, especially food; different flows of finance; movement of people; as well as greenhouse gases and pollution. However, it does not make sense to set priority areas, until the effects of EU initiatives are properly scrutinised according to valid PCD mechanisms.

The guiding idea of this in-depth analysis is that in a changing geopolitical environment, deeper and renewed EU internal and external involvement when reacting to various international crises can be seen as a positive development. Yet, it is the very intensity of the EU's internal transformation towards sustainability that can lead to unintended negative social impacts on the global economy's periphery. In this sense, PCD is far from obsolete. Alongside attention to intersecting inequalities, it has rightly been identified as a key principle that the overarching goal of the United Nations' (UN) 2030 Agenda for Sustainable Development must be met: 'leave no one behind'⁹.

In this sense, to paraphrase the title of a recent study on policy coherence by European civil society, the implementation of PCD (and PCSD) is not just one of many treaty-based policies, but an 'integrity test' for the EU to show its ability in upholding the right to sustainable development of its own citizens without harming the right to sustainable development of those living beyond its border¹⁰. At the same time, as part of traditional and public diplomacy, PCD can also become a tool for harnessing the external support and conditions for the EU to continue to play a leading role in the global governance of sustainable development.

1.2 Objectives of the study

The overarching goal of this study is to assess the current state of play in regard to PCD as it is being implemented by the EU. To reach its inherently normative goal, the in-depth analysis needs to answer the main research question concerning evidence on positive and negative trends in the EU's PCD policy since the 2018 external evaluation commissioned by the EC¹¹. To do so, it sets these trends against a comprehensive model of the policy that includes all the necessary elements for full functionality. Accordingly, its main research question is ultimately broken down into four sub-questions:

1. What is an effective state-of-the-art PCD model in an era of sustainable development?
2. According to current state-of-the-art developments, what policy elements are present and missing in the EU's PCD policy framework?
3. Based on empirical evidence, how have existing elements of the EU's PCD policy contributed to the functioning of PCD since 2018?
4. How is the EU's PCD policy complementary and coherent with the global governance of sustainable development and the 2030 Agenda?

⁸ European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – 'Our World, Our Dignity, Our Future': Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018.

⁹ J. Mackie, G. Allwood, [The implementation of the 2030 agenda's principles of 'leaving-no-one-behind' and 'addressing the needs of those furthest behind first' in the EU's development policy](#), PE 653.657, January 2022, p 57.

¹⁰ CONCORD Europe, ['A Test of the EU's Integrity Towards the 2030 Agenda: The Status of Policy Coherence for Sustainable Development'](#), January 2022.

¹¹ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.

Based on the research question responses, this in-depth analysis sets realistic policy recommendations for ensuring and enhancing Policy Coherence for Development by the European Commission, the European External Action Service (EEAS), the European Parliament (EP) and the Council of the EU.

1.3 Methodology

The first research question builds on mainstream research by international and intergovernmental organisations as well as academic and policy institutions. These elements have been set internally in the EU's most recent policy documents that followed on from past EU treaties: the New European Consensus on development in 2017; and the 2019 EU report on PCD¹². The paper deliberately dismisses those streams of academic literature that deem PCD to be: a distraction from institutions' core tasks; a recognition of the failure to fulfil the declared goal of development policy; or a façade that prevents real transformation of North-South relations¹³. Rather, it builds on a conceptualisation of the eight building blocks originally developed by the Organisation for Economic Co-operation and Development (OECD) for operationalising PCD, which were later adapted for PCSD (see Figure 3). These blocks follow the logic of a policy cycle from political commitment to monitoring and reporting. It is partly complemented by the most recent developments in PCSD operationalisation by the United Nations Environment Program (UNEP)¹⁴.

The second research question response is based on a comparison of existing elements that have been assigned to the eight building blocks with the previously established state-of-the-art model for an effective and impactful PCD policy. This comparison leads to the identification of elements that are needed in the EU's model so as to make it fully functional.

The third research question response is based on a comparison of empirical evidence from documents and interviews concerning the declared functions of already existing policy tools which are linked to building blocks containing a greater level of detail. It also builds on the 2019 external evaluation of PCD, only partially relying on academic literature since most of it precedes 2018¹⁵.

The fourth and final research question response comprises a comparison of approaches to PCD/PCSD by the EU, its Member States, the OECD and the UN, also considering their complementarity. Sustainable development is understood here as being in accordance with the 2030 Agenda, including, for example, peace and inequalities. It builds on existing literature and interviews with the international and regional organisations quoted above.

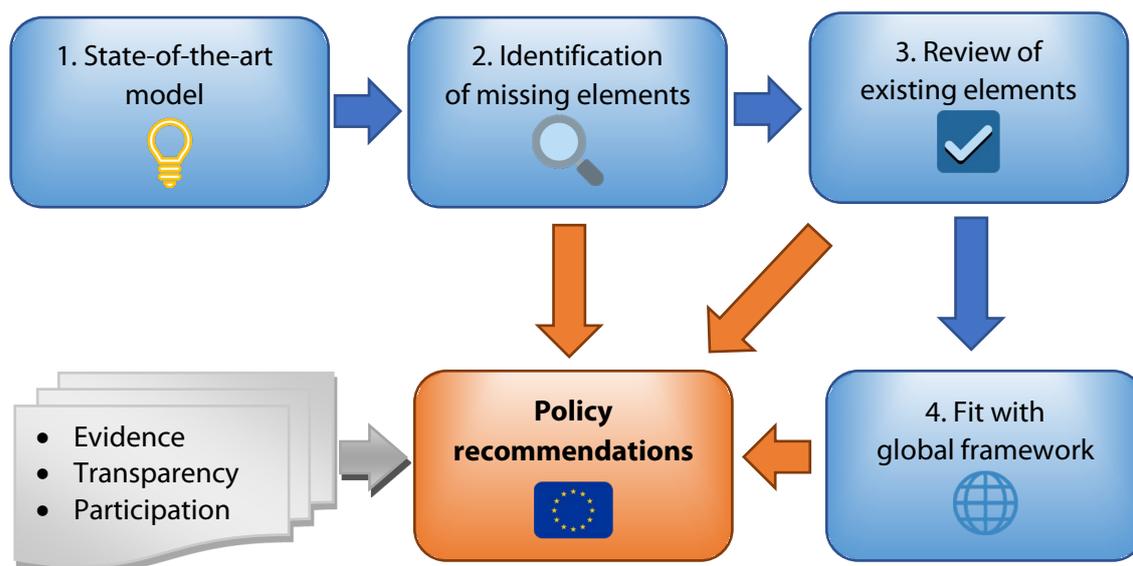
¹² European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – ‘Our World, Our Dignity, Our Future’: Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018; European Commission, [2019 EU Report on Policy Coherence for Development](#), Staff Working Document, SWD(2019) 20 Final, 28 January 2019.

¹³ See the contributions of L. Alan Winters, [‘Coherence with No “Here”’: WTO Co-Operation with the World Bank and the IMF](#), In D. Nelson (ed), *The Political Economy of Policy Reform: Essays in Honor of J. Michael Finger* (Contributions to Economic Analysis), Vol 270, Emerald Group Publishing, Bingley, 2004, pp. 229–351; D. Chandler, [‘The Security–Development Nexus and the Rise of “Anti-Foreign Policy”](#), *Journal of International Relations and Development*, Vol 10, No 4, 2007, pp. 362–386; A. Yunita et al., [‘The \(Anti-\)Politics of Policy Coherence for Sustainable Development in the Netherlands: Logic, Method, Effects’](#), *Geoforum*, Vol 128, 2022, pp. 92–102.

¹⁴ Organisation for Economic Co-operation and Development (OECD), [Better Policies for Development 2015: Policy Coherence and Green Growth](#), OECD Publishing, Paris, 2015; Organisation for Economic Co-operation and Development (OECD), [Policy Coherence for Sustainable Development 2018: Towards Sustainable and Resilient Societies](#), OECD Publishing, Paris, 2018; United Nations Environment Programme (UNEP), [Methodology for SDG-Indicator 17.14.1: Mechanisms in Place to Enhance Policy Coherence for Sustainable Development](#), 2022.

¹⁵ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.; C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume II: Annexes](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.

Figure 1: An overview of the PCD assessment framework



Source: Author's own compilation.

The EU's own policy documents as well as those of other intergovernmental and international organisations are then considered as benchmarks for evaluation. Furthermore, this in-depth analysis commits to the principle of transparent and participative evidence-based policy, understood as conforming to the Better Regulation (BR) Guidelines as 'a way of working that allows political decisions to be prepared in an open and transparent manner, informed by the best available evidence, including via the comprehensive involvement of stakeholders'¹⁶.

These principles are the following:

1. **Evidence-based approach** (or just evidence) for 'policy decisions need to be informed by the best available evidence (including scientific evidence, where available)'.
2. **Transparency** or in other words 'openly documenting the process, making available the evidence underpinning political decisions and explaining the underlying rationale' that 'improves the legitimacy and accountability of EU action'.
3. **Participative approach** (or just participation) since 'all interested parties, be they experts or individuals or groups affected by EU laws and regulation, should be able to contribute to policy-making by expressing their views and providing relevant data'¹⁷.

According to BR Guidelines, any absence of respect for these principles in PCD or other EU regulations means that these policies cannot 'achieve their objectives in the most efficient way' and thus corrective actions need to be taken¹⁸. Hence, the lack of these three principles identified throughout the assessment will ultimately inform the formulation of the final recommendations.

All remaining principles from BR Guidelines such as comprehensive, coherent and proportionate approaches are inherent within the PCD approach. The principle of learning from experience is also included here in the evidence-based methodology and reflected within the accentuated need for any given policy's monitoring progress.

¹⁶ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2021) 305 Final, 3 November 2021, p. 5.

¹⁷ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2021) 305 Final, 3 November 2021, p. 6.

¹⁸ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2021) 305 Final, 3 November 2021, p. 5.

Whilst this in-depth analysis is possibly open to the criticism that it applies principles from the 2021 BR Guidelines retroactively, nevertheless it must be stressed that as its final goal all recommendations are forward looking. Hence, they can and must consider new regulation principles, all of which have been part of the BR agenda since 2015¹⁹.

1.4 Data and limitations

This in-depth analysis relies on publicly available primary documents together with secondary policy and academic literature. Since many PCD procedures are intra-institutional, without publicly available documents, desk research has been complemented by 18 interviews and 2 written communications with officials from EU institutions, notably: the EC, the EEAS, the EP and the Council of the EU; as well as the OECD, the UN office in Brussels, and other stakeholders. All interviews have been anonymised.

The choice of interviewees followed the so-called snowball sampling method. It was completed by contacts, particularly from those EU Delegations (EUD), that are relevant for the follow-up of case studies from the 2018 external evaluation of PCD commissioned by the EC²⁰. Information on recent PCD implementation by EU Member States relies principally on official information from the OECD and on shadow reporting by Civil Society Organisations (CSOs).

Regrettably, unlike the 2018 external evaluation, the European Commission's Directorate-General for International Partnerships (DG INTPA) did not on this occasion make any internal documents available for this research, justifying its decision by the alleged sensitivity of internal documents²¹. However, such complexities and limitations in PCD research provide a valuable reminder of the complexities and limitations in real-life PCD implementation.

1.5 Structure of the study

The in-depth analysis proceeds as follows. Section 2 answers Research Question 1 and having discussed the historical baggage of the concept against current challenges, it presents a comprehensive PCD model that has all the necessary elements for its efficient functioning. Section 3 answers research Question 2, identifying elements and interlinkages that should be present in a legitimate and effective PCD policy. Section 4 responds to Research Question 3 and, building block by building block, focuses on successes and failures in their implementation of PCD. Section 5 presents topical PCD issues in the areas of trade, climate and the environment. Section 6 shifts the focus to the global level, dealing with answers to Research Question 4 and evaluates the EU's role in the global division of labour on policy coherence. Section 7 wraps up the study by presenting conclusions and recommendations to the relevant PCD actors.

¹⁹ European Commission, '[Better regulation for better results – An EU agenda](#)', Communication, COM(2015) 2015 Final, 19 May 2015.

²⁰ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.

²¹ European Commission, Interview with two officers, 20 July 2022.

2 Renewed relevance of PCD in a changing context

2.1 Historical legacy of the concept

The relevant challenges in PCD implementation can partly be explained by its path-dependency. The concept of policy coherence for development is historically conditioned²². Its emergence was made possible only by the Cold War ending, which brought about a partial depoliticisation of development aid, thereby opening the door to the 'development effectiveness' agenda²³. The concept of PCD mostly responded to concerns expressed by development practitioners and policy-makers who feared that the economic policies of developed countries would undermine any benefits provided by development aid. Consequently, the geographical relevance of this concept's use in policy-making as well as its potential for a global spread was from the outset limited to donor countries, traditionally Western-European.

In hindsight, PCD could easily be dismissed as flawed since the assumption that international economic development would automatically lead to the spread of liberal democracy and further global convergence is no longer generally accepted²⁴. Indeed, the policy focus shifted from socio-economic to sustainable development. Furthermore, the geopolitical situation changed with the rise of (re-)emerging powers, thus limiting any relevance for a traditional North-South development agenda and opening space for more egalitarian and pragmatic South-South cooperation.

Moreover, there is an inherent tension between the technical and political sides of the policy coherence concept. Academic studies that have focused on the EU stress a mismatch between the setup of institutional mechanisms to enhance PCD and the lack of political will to make any effective use of them²⁵. A case study on the Common Agricultural Policy, for instance, showed that the PCD mechanism could lead to a freezing of existing trade-offs between the interests of farmers in the EU and developing countries. From this standpoint, PCD gave more legitimacy to the existing misbalance between development and other objectives²⁶.

But an inverse political misbalance would be equally as false. Policy-making will always be influenced by different values and interests and total PCD is therefore impossible:

'[D]evelopment policy must be prepared to consider claims of the validity of rival overriding objectives. One-sided demands for coherence by development policy would not be devoid of moral and political arrogance at this level'²⁷.

As the example of EGD further shows, there can be a conflict between the EU's climate mitigation objectives, a legitimate ingredient of the global sustainable development agenda and the goal of income

²² See J. Mackie, G. Allwood, [The implementation of the 2030 agenda's principles of 'leaving-no-one-behind' and 'addressing the needs of those furthest behind first' in the EU's development policy](#), PE 653.657, January 2022, p 41-44, for an introductory summary to PCD in the EU and M. Carbone, ['Mission Impossible: The European Union and Policy Coherence for Development'](#), *Journal of European Integration*, Vol 30, No 3, 2008, pp. 330-335 for a historical introduction.

²³ O. Horký, 'Policy Coherence for Development of the Czech Republic: Case Studies on Migration and Trade', in P. Hoebink (ed) *European Development Cooperation: In Between the Local and the Global*, Amsterdam University Press, Amsterdam, 2010, pp. 223–258.

²⁴ F. Fukuyama, *The End of History and the Last Man*, Free Press, New York City, 1992.

²⁵ M. Carbone and N. Keijzer, ['The European Union and Policy Coherence for Development: Reforms, Results, Resistance'](#). *The European Journal of Development Research*, Vol 28, No 1, 2016, pp. 30–43.

²⁶ Adelle, C. and Jordan A., ['Policy Coherence for Development in the European Union: Do New Procedures Unblock or Simply Reproduce Old Disagreements?'](#), *European Integration* 36, no. 4, 2014, pp. 375–91.

²⁷ G. Ashoff, [Enhancing Policy Coherence for Development: Justification, Recognition and Approaches to Achievement](#), Studies, German Development Institute, Vol 11, p. 26.

poverty reduction in developing countries. Denying the legitimacy of climate goals would undermine the policy and political dialogue needed to resolve such incoherences.

As a part of PCD's historical legacy, it is also important to stress that while any implementation of the concept or a decision to put a particular issue on the political agenda may be made by governments and parliaments, the impetus to do so often comes from civil society, first at national level and then with any strongly established national position on PCD being considered for uploading into the European level²⁸. Any initial political nature of the PCD agenda may thus be concealed by further institutionalisation with its related bureaucratic procedures.

2.2 Consequences of the global shift from PCD to PCSD

The PCD's understated political nature and compatibility with dominant neo-liberalism perfectly fitted a 1990s and early 2000s socio-economic 'international development' agenda. However, human-induced environmental degradation, climate change and the loss of biodiversity have led to a rise in prominence of the sustainable development concept in global governance²⁹. As a result, the more environmentally-focused sustainable development agenda effectively absorbed the traditional post-Second World War economic and social development agenda. At the same time, 'governance through goals' which orients international action by specific targets rather than only general principles and values, became a prominent way for structuring larger areas of global governance³⁰. Consequently, the SDGs also absorbed most Millennium Development Goals in 2015³¹.

Unlike these latter goals, the UN designed global goals to be holistic, integrative and apply commitments to the global North as well as the global South: 'the Sustainable Development Goals [...] are universal, indivisible and interlinked'³². In a world of structural inequalities between the global North and South and based on the impact gap between development cooperation as well as other policies in the North-South direction, PCD can be applied only by aid donors to their own policies and not by partner countries who have no outward-oriented development policy. Consequently, it could not fit into the new all-global paradigm as a universal goal and needed to be readjusted.

At UN level, the concept of PCD was consequently transformed into the incomparably more encompassing and complex PCSD (see Figure 2). The standalone Sustainable Development Target (SDT) 17.14 'enhance policy coherence for sustainable development' is part of Sustainable Development Goal 17 '[s]trengthen the means of implementation and revitalize the global partnership for sustainable development'. Since all SDTs are entrusted to different UN agencies for the sake of consistent monitoring, 17.14 was assigned to UNEP which was also charged with its further operationalisation³³. Even the OECD with its strong European membership followed suit and practically abandoned its historically very strong support and contribution to PCD³⁴.

²⁸ Ministry of Foreign Affairs of the Netherlands, Interview with diplomat, 25 February 2019.

²⁹ N. Kanie and F. Biermann (eds), *Governing through goals: sustainable development goals as governance innovation*, MIT Press, Cambridge, Massachusetts, 2018.

³⁰ N. Kanie and F. Biermann (eds), *Governing through goals: sustainable development goals as governance innovation*, MIT Press, Cambridge, Massachusetts, 2018.

³¹ A. Ziai, 'The Millennium Development Goals: back to the future?' *Third World Quarterly*, Vol 32, No 1, 2011, pp. 27–43.

³² United Nations General Assembly, '[Transforming our world: the 2030 Agenda for Sustainable Development](#)', A/RES/70/1, 21 October 2015, p. 31.

³³ United Nations Environment Programme (UNEP), '[Methodology for SDG-Indicator 17.14.1: Mechanisms in Place to Enhance Policy Coherence for Sustainable Development](#)', 2022.

³⁴ Organisation for Economic Co-operation and Development (OECD), '[Recommendation of the Council on Policy Coherence for Sustainable Development](#)', OECD/LEGAL/0381, 11 December 2019.

At an international level, PCD as a concept is now in practical terms relevant only to the EU, its Member States and some countries in the European Economic Area as well as the single market, notably Norway and Switzerland – the latter having been a PCD champion in the early 1990s³⁵. According to the latest available OECD peer reviews, no major non-European developed countries, such as the United States of America (USA), Japan, Canada and Australia, have established and implemented dedicated PCD mechanisms³⁶.

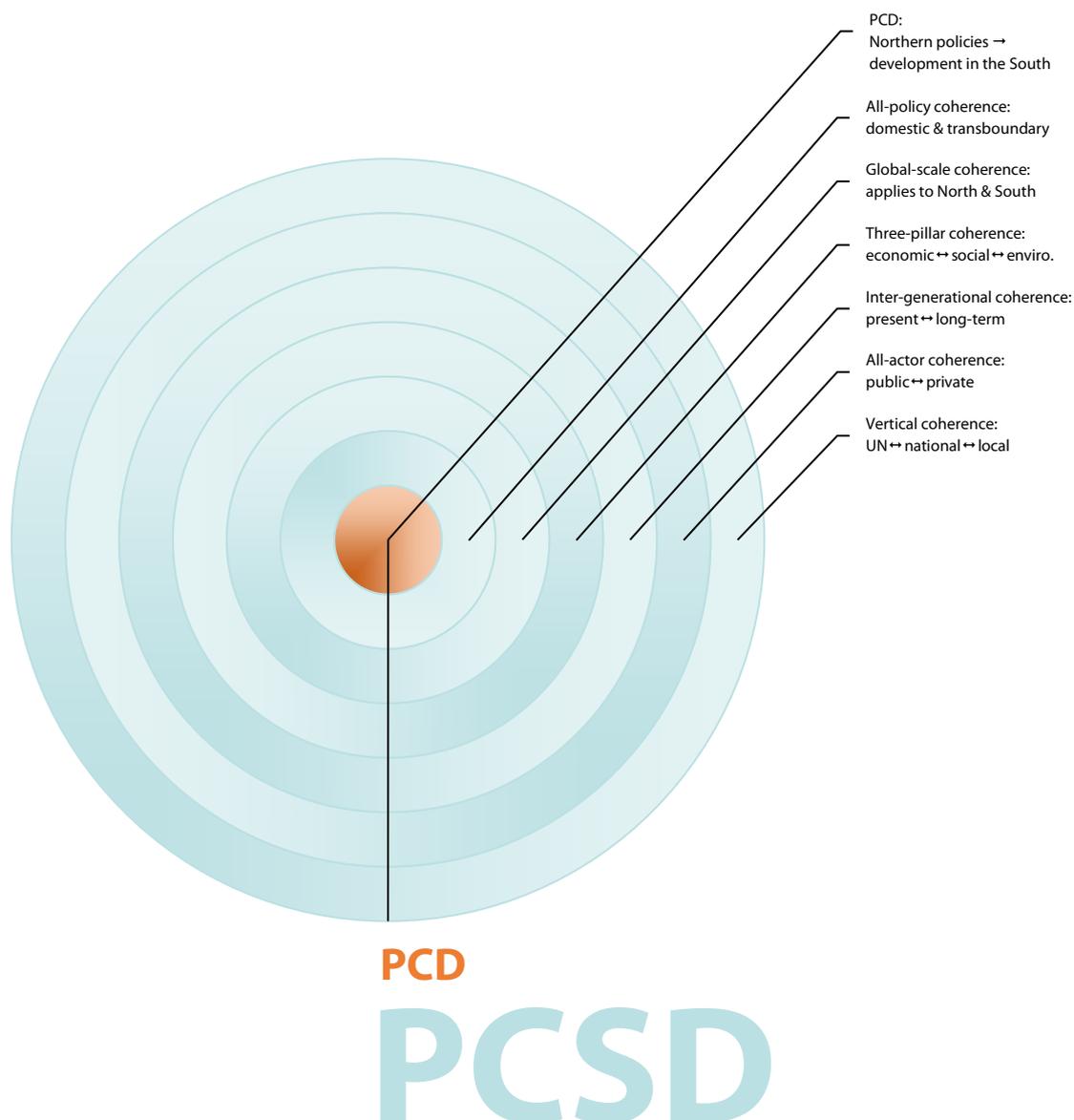
If PCSD is imagined as 'PCD+', this concept and any expected accompanying mechanisms are likely to be extremely complex. Coherence no longer applies only to PCD as policy coherence between Northern policies and development of the global South. It now also includes the need for additional coherence with domestic policies in the North and South, between today's impacts and those in the future, between the three dimensions of sustainable development, from local to UN level and so on (see Figure 2). The OECD defines PCSD as 'an approach to integrate the dimensions of sustainable development throughout domestic and international policy-making'³⁷. Consequently, the PCSD approach applies to *all* policies, at *all* governance levels. It took some time for the OECD and UNEP to realise that operationalisation of PCSD that encompasses *all* policies becomes extremely complex.

³⁵ X. Tschumi Canosa and C. Schümperli Younossian, '[Les lignes directrices Nord-Sud. Un bilan de leur mise en œuvre dans l'administration fédérale cinq ans après leur adoption](#)', *Annuaire suisse de politique de développement*, No 19, 2012, pp 13-35.

³⁶ Organisation for Economic Co-operation and Development, '[OECD Development Co-operation Peer Reviews](#)', accessed 4 September 2022.

³⁷ Organisation for Economic Co-operation and Development (OECD), '[Recommendation of the Council on Policy Coherence for Sustainable Development](#)', OECD/LEGAL/0381, 11 December 2019, p. 6.

Figure 2: Complexity of PCD and PCSD compared



Source: Author's own compilation, based on OECD, 2019.

Following enactment of the 2030 Agenda, the EU reached its current position quite quickly in regard to PCD as a crucial part of contributing to the SDGs. This position was cemented in the New European Consensus on Development in mid-2017³⁸. The EU did not see PCSD as an agenda to be incorporated into the development policy and nor did it consider PCD to be an agenda which should be absorbed into the sustainable development policy³⁹. This is also in line with DG INTPA's own understanding of PCSD as 'PCD

³⁸ European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – 'Our World, Our Dignity, Our Future': Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018.

³⁹ European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – 'Our World, Our Dignity, Our Future': Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018.

in a sustainable development context⁴⁰. Nevertheless, the confusion created by having to clarify this extremely complex concept of PCSD ultimately led to the exhaustion of policy capacities and consequent delay in continued implementation of PCD policies. Eventually in 2019, the EC expressed its regret that ‘for some EU Member States, PCD has been partially or totally subsumed by PCSD’⁴¹, allegedly under the OECD’s influence.

Nowadays, the global limitations of PCSD have become clear. Recent research has shown that SDGs have not kept their promises and are not transformative⁴². Moreover, ‘siloesation’ in international and regional organisations that PCSD aims to break down has in reality increased despite the promise of integration⁴³. The pursuit of sustainable development is a long-term, inter-generational project requiring the transformation of whole societies.

To date in 2022, while PCD is almost exclusively promoted by DG INTPA, PCSD would not be used outside the Directorate-General for the Environment (DG ENV)⁴⁴. This is also reflected by very rare references to PCSD in official documents by the EC as a whole⁴⁵. Significantly, at Member States level confusion remains very marked and hence their approaches diverge substantially, in that they can opt to place policy coherence in PCD, PCSD or SDG frameworks, as a recent review of the EU’s implementation by civil society reveals⁴⁶.

2.3 Geopolitical competition and systemic disruptions

This positive shift towards sustainable development at a global level was not the only threat to the continuation of PCD. The broader international environment has undergone negative shifts toward self-interest. In one way or another, the ‘for development’ part of PCD puts forward the interests of developing countries. These are too often antagonistic or indifferent towards the interests of developed countries⁴⁷. The EU Global Strategy already set ‘principled pragmatism’ as a guiding principle for its external policy in 2016. This shift responded to increased geopolitical competition worldwide and related crises that tend to hit Europe more severely than other world regions⁴⁸.

The list of internal and/or external crises that have impacted the EU over past years is long, but in most cases these crises have led policy-makers to make the EU’s development policy more pragmatic. The Great Recession of 2008/2009 and related debt crisis put more emphasis on the EU’s economic competition with the less affected emerging powers as did the more recent COVID-19 pandemic. The refugee crisis in 2015 increased securitisation of the EU’s development aid, as attested by establishment of the EU Emergency Trust Fund for Africa and partly by a 10 % allocation to migration and displacement in the EU’s

⁴⁰ European Commission, Interview with officer, 15 September 2021.

⁴¹ European Commission, [2019 EU Report on Policy Coherence for Development](#), Staff Working Document, SWD(2019) 20 Final, 2019, p. 55.

⁴² F. Biermann et al., ‘[Scientific Evidence on the Political Impact of the Sustainable Development Goals](#)’, *Nature Sustainability*, Analysis, Vol 5, 2022, pp.795-800.

⁴³ M. Bogers et al., ‘[The Impact of the Sustainable Development Goals on a Network of 276 International Organizations](#)’, *Global Environmental Change*, Vol 76, 2022, pp.1-12.

⁴⁴ European Commission, Interview with officer, 15 September 2021.

⁴⁵ European Union, [Decision \(EU\) 2022/591 of the European Parliament and of the Council of 6 April 2022 on a General Union Environment Action Programme to 2030](#), OJ L 114, Official Journal of the European Union, 6 April 2022, p. 27.

⁴⁶ CONCORD Europe, ‘[A Test of the EU’s Integrity Towards the 2030 Agenda: The Status of Policy Coherence for Sustainable Development](#)’, January 2022.

⁴⁷ G. Ashoff, [Enhancing Policy Coherence for Development: Justification, Recognition and Approaches to Achievement](#), German Development Institute, Bonn, 2005, pp. 23–26.

⁴⁸ European Union ‘[Shared Vision, Common Action: A Stronger Europe. A Global Strategy for the European Union’s Foreign and Security Policy](#)’, Global Strategy, 2 June 2016, p.8.

Neighbourhood, under the title Development and International Cooperation Instrument–Global Europe (NDICI-Global Europe)⁴⁹.

Russia's war of aggression in Ukraine is currently affecting the EU's energy security and economic performance. It may also have a detrimental impact on the amount of funding available for the EU's active role in other world regions, thus consequently weakening its geopolitical standing. The climate crisis is also taking its toll through extreme weather conditions, calling for huge investments in green transition at home⁵⁰. Internally, the 'veritable risk of stagflation in the coming years' threatens livelihoods and populism undermines the EU's unity in tackling these various crises⁵¹.

This unusually high incidence of crises has led to descriptions of the EU's current circumstances as being in a state of 'permacrisis' or 'polycrisis'⁵². On the one hand, in emergency situations the need for flexibility of policy tools undermines the possibility of an in-depth analysis and scrutiny of policy impacts, especially outside the Union. The 'permacrisis' situation is hence at odds with favourable conditions for PCD implementation. On the other hand, research shows that the EU's response to 'polycrisis' was depicted as 'muddling through' with incremental changes rather than 'heading forward' or 'breaking down'⁵³. Still, these crises did not automatically lead to any weakening of the European institutions which quickly adapted to the new circumstances. The use of expertise and experts in policy-making, a substantial part of PCSD mechanisms, also generally increased⁵⁴.

2.4 Strong case for deepening PCD implementation

To summarise, the partial shift towards PCSD and the challenging global environment were a mixed blessing for PCD. In spite of the adverse developments, there are strong arguments for PCD to remain a crucial part of the EU's external policy:

1. PCD is firmly **anchored in the treaties**: The Union shall take account of the objectives of development cooperation in the policies that it implements which are likely to affect developing countries⁵⁵. On the one hand, this gives PCD stronger legitimacy than, say, commitments on providing a certain volume of Official Development Assistance, but on the other hand, this argument should be rather understood as an opportunity than strength since all legal obligations need to be actively promoted and implemented throughout the policy cycle.
2. At the same time, PCD is **open to further evolution**, readjustment or even rebranding in a large context of sustainable development transformation. The term 'Policy Coherence for Development' is not part of the treaties, having appeared in an EC communication only in 2005, in other words 13 years after the Maastricht Treaty coined the commitment⁵⁶.

⁴⁹ European Union, [Regulations EU 2021/947 of the European Parliament and of the Council of 9 June 2021 establishing the neighbourhood, development and international cooperation instrument – Global Europe](#), OJ L 209, Official Journal of the European Union, Luxembourg, 9 June 2021, p. 9.

⁵⁰ Intergovernmental Panel on Climate Change, [Climate change 2022. Mitigation of Climate change. Working Group III contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change](#), Summary for Policymakers, IPCC AR6 WGIII, 2022.

⁵¹ M. Demary and M. Hüther, ['How Large Is the Risk of Stagflation in the Eurozone?](#), *Intereconomics*, Vol 57, 2022, pp. 34–39.

⁵² F. Zuleeg, J. A. Emmanouilidis, and R. Borges de Castro, ['Europe in the Age of Permacrisis'](#), Commentary, European Policy Centre, 11 March 2021; M. Riddervold, J. Trondal and A. Newsome (eds.), *The Palgrave Handbook of EU Crises*, Palgrave Macmillan, Cham, 2022.

⁵³ M. Riddervold, J. Trondal and A. Newsome, *The Palgrave Handbook of EU Crises*, Palgrave Macmillan, Cham, 2022, p. 236.

⁵⁴ M. Riddervold, J. Trondal and A. Newsome, *The Palgrave Handbook of EU Crises*, Palgrave Macmillan, Cham, 2022, p. 236.

⁵⁵ European Union, [Consolidated Version of the Treaty on European Union](#), OJ C 202, Official Journal of the European Union', 2016, p. 141.

⁵⁶ European Commission, ['Policy Coherence for Development. Accelerating Progress towards Attaining the Millennium Development Goals'](#), COM(2005) 134 Final, 12 April 2005.

3. The rhetorical shift of the 2030 Agenda and the SDGs toward a one-size-fits-all approach does not erase the **persistent North-South divide**⁵⁷. When compared with PCSD, a stronger focus on the North's responsibility in PCD is proportionate and adequate.
4. It makes sense for the EU to contribute to the SDGs by focusing on a relatively well-defined and established policy. If PCD lacks clarity and is difficult to operationalise, **PCSD is disproportionately more complex** and difficult to translate into practice. Unlike PCSD, PCD can bring mid-term rather than long-term benefits.
5. The key rationale within the EGD is the environmental logic of climate change mitigation inside the EU and beyond. The need for a 'set of deeply transformative policies' and the absencing of reference to PCD generates the risk of negative **social and economic externalities from EGD** especially in developing countries⁵⁸.
6. Any perception of the EU by former colonial powers and hence citizens of the global South, particularly those from Africa, is more negative than that of other global powers⁵⁹. Ensuring and communicating what the EU does to help developing countries beyond aid to decision-makers and citizens alike is hence a way for the EU to **consolidate its global position**.

PCD remains a tool that is fully compatible with its identity as a 'Normative Power Europe'⁶⁰. Ultimately, as an academic study on PCD implementation by the EU concluded, 'a continuing inability to practice what it preaches will undermine the credibility and legitimacy that the EU seeks in its interactions with other global actors'⁶¹. However relevant, this pragmatic dimension is, though, rare in the EU's documents, having appeared only in the 2019 Reflection Paper, as quoted in the opening pages of this in-depth analysis.

2.5 A comprehensive model for PCD assessment

Despite both legal and pragmatic reasons for supporting PCD as a matter of policy, there are also relevant challenges that are related not only to implementation itself but also the understanding of PCD by the actors who are made responsible for its implementation. The 2018 external evaluation of the EU's Policy Coherence for Development, commissioned by the European Commission, concluded that there was 'no common understanding of the EU PCD approach and the EU's commitment on PCD'⁶². Consequently, it was recommended that the EU should 'clarify the understanding of the PCD commitment contained in article 208' of the TFEU⁶³. This lack of clarity contrasts with the fact that this commitment to 'take account of the [development cooperation objectives] in the policies that [the EU] implements which are likely to

⁵⁷ L. Chancel, T. Piketty, E. Saez, G. Zucman, et al., [World Inequality Report 2022](#), World Inequality Lab.

⁵⁸ European Commission, [The European Green Deal](#), Communication, COM(2019) 640 Final, 11 December 2019, p. 4.

⁵⁹ J. Appiah-Nyamake S. and E. Selormey, '[Africans Welcome China's Influence but Maintain Democratic Aspirations](#)', *Afrobarometer Dispatch*, No 489, 15 November 2021, p. 8.

⁶⁰ I. Manners, '[Normative Power Europe: A Contradiction in Terms?](#)', *Journal of Common Market Studies*, Vol 40, No 2, 2002, pp. 235–258.

⁶¹ C. Adelle and A. Jordan, '[Policy Coherence for Development in the European Union: Do New Procedures Unblock or Simply Reproduce Old Disagreements?](#)', *Journal of European Integration*, Vol 36, No 4, 2014, pp. 375–391, p. 389.

⁶² C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. x.

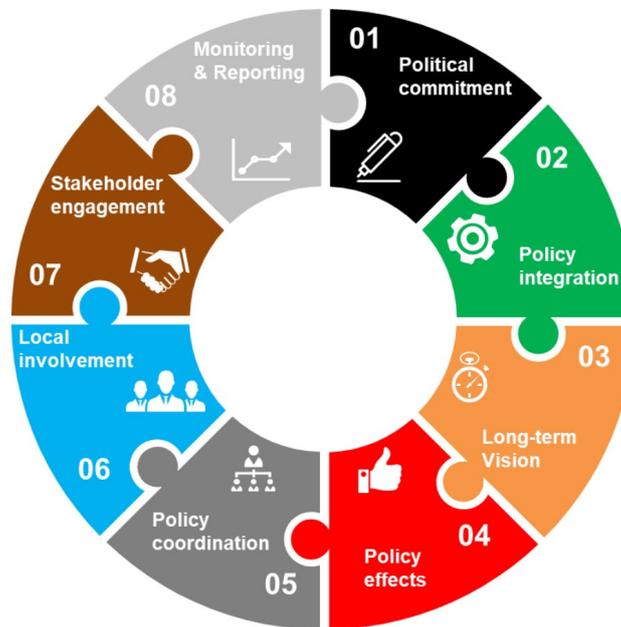
⁶³ C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. xi.

affect developing countries’ has been a verbatim part of the EU’s treaties since the Maastricht Treaty in 1992⁶⁴.

The emergence of PCSD as a larger concept certainly contributed to the confusion, albeit this lack of clarity has been a long-standing feature of PCD in mainstream academic research well before 2015⁶⁵. Beyond academic enquiries, this lack of clarity is a very practical problem. Until the meaning of an EU commitment on PCD is sufficiently clarified, any assessment of its implementation will remain a contentious issue within, between and beyond the European institutions. As an academic rightly observed, ‘assessing [PCD] progress cannot even result in a debate about whether “the glass is half-full or half-empty”, and instead tends to produce disagreement both on the size of the glass and its contents’⁶⁶. This clarification will not resolve trade-offs and clashes between values and interests of different political actors but it is a precondition for their exposure, discussion and possible resolution.

This in-depth analysis is therefore based on the assumption that a more conceptual approach to PCD and transparent establishment of the evaluation criteria will also lead to a more consensual and accountable assessment of precisely what is implied by the EU’s implementation of PCD. At the same time, it is impossible to set an ideal model and expect uniform alignment by all actors. Due to its combined political and technical nature, any resolution and agreement on what an ideal PCD model constitutes cannot be answered by experts alone but must also include all policy-makers and other stakeholders.

Figure 3: Eight building blocks of PCSD in the implementation of the 2030 Agenda



Source: OECD, 2018.

It is possible, though, to identify at least the necessary elements of a comprehensive model that remain relevant across different institutional cultures. A consensual way to assess the EU’s policy coherence from

⁶⁴ European Union, [Treaty on European Union](#), OJ C 191, Official Journal of the European Communities, 29 July 1992, 30; currently European Union, [Consolidated Version of the Treaty on European Union](#), OJ C 202, Official Journal of the European Union, 7 June 2016, p. 141.

⁶⁵ A. Sianes, ‘[Shedding Light on Policy Coherence for Development: A Conceptual Framework](#)’, *Journal of International Development*, Vol 29, No 1, 2013, pp. 134–146.

⁶⁶ M. Carbone and N Keijzer, ‘[The European Union and Policy Coherence for Development: Reforms, Results, Resistance](#)’. *European Journal of Development Research*, Vol 28, No 1, 2016, p. 34.

a conceptual perspective is to identify the missing elements against a model that has undergone both technical analysis and political deliberation. In 2010, the OECD (and consequently a large majority of EU Member States that are also OECD members) agreed on a three-phase model following policy cycle logic: (i) political commitment, (ii) policy co-ordination and (iii) monitoring, analysis and reporting⁶⁷. Reacting to the emergence of PCSD in the 2030 Agenda, the OECD further harnessed previous expertise from PCD implementation by; relabelling the original phases as 'blocks'; and adding five more blocks to fit the needs of PCSD (see Figure 3). It is also important to stress that the building blocks are to be considered as necessary, albeit not sufficient elements for an impactful implementation of policy coherence.

Two blocks, one on policy integration from the three pillars of sustainable development and another on long-term planning horizons, carry the original concept's heritage of sustainable development and hence they are mostly relevant to its domestic implementation (see also Figure 2). The three remaining PCSD blocks are also highly relevant for PCD.

As the following contrasting assessment of the adapted blocks applied to the EU's PCD model shows, the OECD rightly split up the monitoring and reporting block into a new standalone block for policy effects (which focuses on the impacts of specific policies scrutinised by PCD) as well as monitoring and reporting of the PCD policy as such. Adding two building blocks on the participation of lower governance levels and other stakeholders is equally relevant, as it focuses on interlinkages with other actors that either implement policies (such as EU Member States) or experience their impacts (as with stakeholders in developing countries).

The most recent elaboration of these eight PCSD blocks by UNEP recognises and follows-up on the OECD's work. It extends the eight building blocks' validity to the global South without substantial modifications. It merges the subnational level and other stakeholders into one new block labelled 'Participatory processes' and creates a standalone block called 'Financing for policy coherence'⁶⁸. The original eight-block framework by the OECD remains the most suitable for assessing the EU's PCD model, but a standalone block on financing serves as a useful reminder to take into consideration any capacities allocated to PCD by the European institutions.

⁶⁷ Organisation for Economic Co-operation and Development (OECD), '[Recommendation of the Council on Good Institutional Practices in Promoting Policy Coherence](#)', 2010 Version, OECD Legal Instruments, OECD/LEGAL/038, 2010.

⁶⁸ United Nations Environment Programme (UNEP), '[Methodology for SDG-Indicator 17.14.1: Mechanisms in Place to Enhance Policy Coherence for Sustainable Development](#)', 2022.

3 Identification of missing elements

3.1 Comparison of building blocks with existing tools

Table 1 here links the identified PCD tools used by the EU with the eight building blocks and scores for their aggregate absence, partial presence, full presence, or irrelevance on a modified traffic-light scale. Unlike Section 4, the focus here is not on actual use, effectiveness and efficiency of the tools. This review assesses only the model’s theoretical potential to deliver.

Table 1: Checklist of policy coherence building blocks in the EU’s PCD

PCSD Building block	Task	Post-2015 PCD relevance	EU tool	Score	Explanation
Political commitment (2010)	Ensure commitment and leadership at highest level	✓	EC communications Council conclusions EP resolutions Joint statements	■ ■ ■ □	Commitment to PCD as a procedure is repeatedly reconfirmed but there is no explicit commitment to impacts.
Policy integration	Consider interactions between economic, social & environmental policies	✗		□ □ □	PCD already operates with an integrative concept of poverty/development framed by SDGs, though people-centred development may be side-lined.
Long term planning horizons	Ensure plans that go beyond electoral cycles	✗		□ □ □	More relevant to national level. EU policy-making is much less dependent on national and European electoral cycles.
Policy effects	Systematically consider the effects of policies on wellbeing	✓	Ex-ante impact assessments Delegation Reports Ex-post evaluations Better Regulation Sustainability impact assessments EP assessments	■ ■ ■	In principle the EU has all the tools to study policy effects available.
Policy coordination (2010)	Assign responsibility for overall coordination at appropriate level	✓	EC Interservice consultations EC Work Programme tracking EP coordination Training Awareness-raising	■ ■ ■ □	Policy coordination exists, yet it is not specific to PCD. Responsibility for PCD coordination is not clearly assigned, it is assumed by DG INTPA at low levels of decision-making, and increasingly so by the Secretariat-General.
Subnational and local involvement	Enable participation of regions, cities and municipalities	✓	Member States reporting	■ ■ ■	By analogy, EU Member States are involved in decision-making through the Council of the EU. They report on their own progress to the EC.
Stakeholder engagement	Identify common challenges, set priorities, align actions and mobilise resources	✓	Policy dialogue NDICI – Global Europe	■ ■ ■ □	By analogy, developing countries participate on PCD only informally through policy dialogue led by their governments. Other stakeholders do not participate. Resources are not earmarked to PCD.
Monitoring and reporting (2010)	Identify targets and indicators to track progress	✓	EU Reports on PCD	■ □ □	PCD reports do not include targets and indicators to track progress.
Legend	Absence ■ □ □ Partial presence ■ ■ □ Presence ■ ■ ■ Irrelevance □ □ □				

Source: OECD, *Policy Coherence for Sustainable Development, 2018*; own compilation.

Comparing existing tools with a comprehensive model based on synthesised experiences by the OECD and UNEP demonstrates that the EU scores well on the existence of mechanisms to engage with its Member States – this is an inherent part of the EU’s multi-level governance – and has tools to assess policies along their whole cycles (at this point the quantity and quality of their use is not assessed). The EU checks the presence of three building blocks only partially and it misses the substance of one block completely.

3.2 Insufficient political commitment to impacts

From a cursory look at official documents, it would be easy to conclude that the EU’s political commitment to PCD is clear and beyond any doubt. However, it is crucial to focus on the ‘institutionalised’ character of this commitment according to the latest UNEP model as well as the depth of EU commitment according to one of three key recommendations from the EC’s 2018 external evaluation⁶⁹. It is striking that the EU could maintain a PCD policy for almost three decades without sufficiently clarifying its commitment. Indeed, it seems that the very woolliness of the policy was a precondition for both its sustainability and inefficacy. This ambiguity probably results from depoliticisation being one of the key characteristics of EU policy-making⁷⁰.

The EU’s general approach to PCD has always been more instrumental than conceptual and self-reflexive. When contrasted with the OECD’s approach, this is also related to the EU’s unique multi-level governance model. It is certainly true that the OECD’s secretariat, an intergovernmental organisation, can easily synthesise lessons learnt from its members’ peer reviews, including those about PCD. However, this does not mean that the general lessons on PCD governance cannot also be accommodated within the EU as a major regional organisation.

Article 208 of the TFEU defines the EU’s commitment to *take into account* the primary objective of reducing poverty in those policies that impact developing countries⁷¹. Yet, there is no consensus on whether this commitment is meant to be purely procedural or necessarily subject to demonstration in practice. And while the New European Consensus on Development has a standalone sub-chapter on PCD, it does not provide precise details of this commitment either. It extends the scope of ‘efforts in applying PCD across all policies and all areas covered by the 2030 Agenda’⁷². This can be understood as an affirmation that if an area is covered by an SDG, it is not merely ‘likely’ to affect developing countries but will do so with certainty since SDGs apply to all countries. Consequently, the 169 global goals can be considered as a checklist of PCD-relevant areas. In terms of PCD tools, the Consensus states that the EU and its Member States must ‘ensure the evidence base of policy impacts on developing countries through consultations, stakeholder engagement, ex-ante impact assessments and ex-post evaluations of major policy initiatives’. Policy initiatives should also ‘wherever relevant, indicate how they contribute to sustainable development in developing countries’⁷³.

The EU’s approach to PCD, as rooted in the main documents, is hence purely procedural, or in other words, related to internal processes such as consultations and assessments. In reality, as exposed by the 2018

⁶⁹ United Nations Environment Programme (UNEP), [‘Methodology for SDG-Indicator 17.14.1: Mechanisms in Place to Enhance Policy Coherence for Sustainable Development’](#), 2022, p. 2.

⁷⁰ M. Flinders and J. Buller, [‘Depoliticisation: Principles, Tactics and Tools’](#), *British Politics*, Vol 1, No 3, 2006, pp. 293–318.

⁷¹ European Union, [Consolidated Version of the Treaty on European Union](#), OJ C 202, Official Journal of the European Union, 2016, p. 141, my emphasis.

⁷² European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – ‘Our World, Our Dignity, Our Future’: Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018, p. 53.

⁷³ European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – ‘Our World, Our Dignity, Our Future’: Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018, p. 53.

external evaluation, there is a whole spectrum of actors and stakeholders inside and outside the European institutions. They range from those who think that the 'EU has an obligation to ensure that none of its internal policies harm developing countries and rather make a positive contribution to the situation of developing countries whenever possible' and those who claim that the EU should merely "consider" or "be aware" of potential developing countries impact, but that it is under no obligation to adapt or modify its policies accordingly⁷⁴.

This divide between 'procedural' versus 'process- and impact-related' approaches is also partly reflected by the difference in PCD assessments by the EP and EC. Whilst in its last resolution to date, the EP regretted that there had been 'little progress', by contrast the EC claimed that 'considerable progress [was] made on concrete PCD implementation'⁷⁵. In spite of being considered as a 'guardian' of PCD, DG INTPA also tends to be on the 'awareness' side.

Nevertheless, the New European Consensus on Development considers PCD to be a 'crucial element of the strategy to achieve the SDGs'⁷⁶. Hence, PCD is implicitly expected to be judged by its impacts on meeting global goals rather than checks on compliance with procedures inside EU institutions.

These diverging understandings of PCD are not just of academic interest. The consensus on a 'consistent understanding and shared commitment regarding PCD among Commission and EEAS services' is a key assumption within PCD intervention logic, as developed by the policy's external evaluators⁷⁷. The absence of a single basic assumption thwarts downstream implementation of PCD as a whole. As an assessment of the EU's actual PCD model, these findings mean that there is only partial political commitment to one of the key building blocks of policy coherence.

In sum, the New European Consensus on Development implies that some level of impacts generated by PCD on developing countries is part of the EU's commitment to PCD, but this implicit and indirect recognition cannot compare with a clear political commitment to PCD impacts. It lacks the democratic legitimacy of EU treaties that are approved by national parliaments or even in referenda. Hence, the real intensity of any commitment is another issue, alongside the question to what extent should procedures be explicit and transparent (or not) to reach a final political decision leading to positive impacts on developing countries.

3.3 Dispersed coordination and low participation

On policy coordination and stakeholder engagement, the EU is again checking only partly. The EC has a general mechanism of interservice consultations, which is not specific to PCD. This is not a problem from a policy coherence perspective, yet experience shows that responsibility for overall coordination needs to be located at an appropriate level. In the case of PCD, responsibility is diffused rather informally within DG INTPA in different units between the focal point on PCD in the unit 'Effective development policy and Team Europe' (DG INTPA.D.1), 'General coordination and Inter-institutional Relations' (DG INTPA.01) and other

⁷⁴ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, pp-66–67.

⁷⁵ European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, pp., 2–3; European Commission, [Follow up to the European Parliament Resolution on the EU 2015 Report on Policy Coherence for Development, Adopted by the Commission on 4 October 2016](#), 18 November 2016, p.2.

⁷⁶ European Commission, Directorate-General for International Cooperation and Development, [The New European Consensus on Development – 'Our World, Our Dignity, Our Future': Joint Statement by the Council and the Representatives of the Governments of the Member States meeting within the Council, the European Parliament and the European Commission](#), 2018, p. 52.

⁷⁷ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume II: Annexes](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, xi, p. 15.

thematic units⁷⁸. The Secretariat-General (SEC GEN) is becoming increasingly involved, but again, its application of PCD is thought to be somewhat intuitive rather than led by a plan⁷⁹.

Even though the OECD offers only a recommendation to place coordination at an 'appropriate level', one might imagine that placing coordination centrally could increase the importance and effectiveness of PCD, leading to a desirable whole-of-government approach. However, this arrangement would not be in line with the EU's institutional tradition. Placing the coordination and, most importantly, PCD screening of the initiatives with the SEC GEN, would disconnect it from knowledge that is located within DG INTPA and it would further increase the distance from knowledge available within EEAS. The block requiring centralised policy coordination is interrelated and mutually weakened by the missing formalised monitoring of PCD that also needs to be centralised.

The EU also scores only partially on stakeholder involvement. The legitimacy of stakeholders who are EU citizens or public and private entities to shape EU policies is naturally higher than the legitimacy of those who are not, albeit this legal barrier does not prevent direct participation from being recognised as a necessary element for policy coherence to work. The only, rather informal way to include stakeholders from the global South is through policy dialogue with the governments of the partner countries via EUDs. There is no direct way of involving these governments and *a fortiori* the citizens, civil society and private sector in PCD mechanisms. Their positions may be intermediated by EU-based CSOs, yet this type of participation ranks again as only partial. The involvement of stakeholders beyond the EU institutions would also probably require earmarked funding.

3.4 Absence of monitoring

The only area where the EU does not score at all is in monitoring and reporting. The Commission's reports on PCD are not always biannual as planned, there having been a gap between the 2015 and 2019 reports. However, the key problem consists in the total lack of targets and indicators to track progress on PCD. The absence of a monitoring system for PCD and the need for a 'strategic approach' including formalisation of the whole policy cycle was also heavily emphasised in a briefing commissioned by the EP in 2016⁸⁰.

3.5 Identification summary

The PCSD-informed check of the EU's PCD tools can be synthesised by identifying two major deficits: the absence of monitoring and leadership on PCD. The lack of leadership is understood here as the joint problem of insufficiently defined responsibility on PCD, combined with unclear political commitment to achieving clear impacts by the EC. The absence of monitoring is further reinforced by the limited possibilities of stakeholders affected by the EU's policies to feed into this process.

These two broader problems are intrinsically connected in the underlying logic of block-building a policy cycle: the lack of leadership and common commitment prevent the EU from setting up sufficiently concrete targets that could be monitored, evaluated and reported upon. Similarly, the absence of a proper monitoring process does not require any clear definition of responsibility on PCD performance.

The main takeaway from the evaluation of missing or only partially existing building blocks is that even if specific elements of the EU's PCD toolbox were maximally efficient when viewed separately, the system as whole is simply incapable of delivering its expected impacts.

⁷⁸ European Commission, Interview with officer, 12 July 2022; European Commission, Interview with two officers, 20 July 2022.

⁷⁹ European Commission, Interview with officer, 30 August 2022.

⁸⁰ M. Carbone, 'The European Union and Policy Coherence for Development: High on Mechanisms, Low on Achievements, Briefing by Maurizio Carbone', in European Parliament, [EU Policy Coherence for Development: The challenge of sustainability](#), Workshop, 2016, pp. 14–21.

4 Progress review of the existing tools

4.1 Review structure

This Section answers the third research question on how much different policy elements contribute to PCD goals established in the EU's own policy documents. If these goals are not set in relation to PCD, then they are evaluated according to their expected role in the consensual eight-block model. Being more generally labelled as tools here, these elements are not organised in accordance with various actors, but rather their contribution to a specific block. Most tools also include interlinkages between the various actors and stakeholders, but for the sake of their presentation, the network structure of PCD is reduced to clearly delineated tools. Tool reviews share a similar structure and provide answers to the following questions:

1. Lessons learnt

- a. What evidence is there on the tool's implementation, based on the 2018 external evaluation and other sources?
- b. What notable recommendations, if any, did the 2018 external evaluation or other sources, including resolutions by the EP, formulate for this particular tool?

2. Recent progress

- a. What evidence is there to show changes in the design and/or implementation of the tool since 2018?
- b. If the required information is not available, how could it be obtained?

3. Assessment

- a. Is the tool on track (■■■■), at risk (■■■□) or off-track (■■□□) to meet its purpose or is the data to assess the tool not available (□□□□)?
- b. How can the attribution of a traffic-light category be justified?

The entire assessment is summarised in Table 2 on page 37 below. To keep a balance between the blocks and having merged subnational and local involvement as well as stakeholder engagement by UNEP under one label, these tools are analysed in sub-section 4.5 Participation.

4.2 Political commitment

4.2.1 Communications by the European Commission

Lessons learnt

The 2018 external evaluation acknowledged a lack of clarity on the EU's commitment to PCD. More importantly, it pinpointed an 'urgent need for the EU to clarify its political commitment to PCD *through an official communication*' by establishing, *inter alia*: the rules of determining which policies are PCD-relevant; explicating the role of other DGs; selecting priority areas; and elaborating on diverse tools⁸¹. This recommendation was issued with 'high importance in the short-term horizon'⁸².

⁸¹ The emphasis is the author's. C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 72.

⁸² C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 71.

The EP also called on the EC and EEAS to ‘define more clearly the responsibilities of each EU institution in achieving PCD commitments’ in 2016⁸³. The most recent UNEP conceptualisation recognises that policy commitment must be ‘institutionalised’ and hence explicit⁸⁴. With regard to the interrelated building block ‘Policy coordination’, the communication should also establish which actor, DG INTPA or SEC GEN, is responsible for centralised policy coordination and monitoring.

Recent progress

To date, the EC has published no Communication on PCD adapted to the sustainable development context nor has it offered any explicit clarification of PCD since publication of the external evaluation in 2018. The 2019 EU report merely referred to the then recently published evaluation report and hence its recommendations did not result in any subsequent follow-up action. The 2019 report gives some keys on the distinction between PCD and PCSD but given its nature, it cannot go beyond the new European Consensus on Development and most of its content is more about the EU’s contribution to the SDGs in five areas rather than going into any detail on PCD⁸⁵. It did answer the need for selecting priority areas though the practical benefit is unclear.

Assessment ■

The EC is off-track in strengthening and clarifying political commitment to PCD at an appropriate level, as also asked by the 2018 external evaluation. Communications by the EC are non-binding legal instruments but they do have a higher political profile than reports. They are also more political than technical in nature. Any decision to issue a new communication would require discussions among different DGs not only to clarify the EU’s commitment to PCD impacts, but also to select the PCD coordinating body. Moreover, the new communication could tackle PCSD, an area that shares similar problems to those of PCD and delineate the division of labour between the SEC GEN as a central body and DG INTPA as a ‘guardian’ of PCD.

4.2.2 Conclusions by the Council of the EU

Lessons learnt

In the past, the Council of the EU has played a leading role in promoting PCD, though generally on the initiative of some Member States and particularly within their rotating presidencies of the Council. Already in 1997, the Council invited the Commission to present PCD reports ‘preferably on an annual basis’⁸⁶. This leading role is also documented by the fact that the Commission issued its first Communication on PCD following the Council’s request in 2005⁸⁷. The EP’s 2016 resolution also called for greater involvement from the Council, even asking for PCD to be discussed at the top political level by the European Council⁸⁸.

⁸³ European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, p. 3.

⁸⁴ United Nations Environment Programme (UNEP), [‘Methodology for SDG-Indicator 17.14.1: Mechanisms in Place to Enhance Policy Coherence for Sustainable Development’](#), 2022, p. 3.

⁸⁵ European Commission, [2019 EU Report on Policy Coherence for Development](#), Staff Working Document, SWD(2019) 20 Final, 2019, pp. 17–54.

⁸⁶ M. Carbone, [‘Mission Impossible: The European Union and Policy Coherence for Development’](#), *Journal of European Integration*, Vol 30, No 3, 2008, pp. 332.

⁸⁷ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 5.

⁸⁸ European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, p. 3.

Recent progress

The leading role played by the Council of the EU as a decision-making body has weakened in relation to PCD. In its Conclusions to the 2019 PCD report, the Council was quite positive in its assessment in spite of the lack of evidence that PCD works. It recommended further expansion for ‘the use of PCD screening in relevant future policy initiatives’⁸⁹. It noted ‘increased clarity brought to the PCD’ and reiterated the principle of ‘taking into account any possible impacts on developing countries from the outset of their formulation’⁹⁰. The remaining conclusions do not reveal anything that was not already stated in the Consensus or in the PCD report. These Conclusions do not consider the serious findings of the 2018 external evaluation, although at the time of their adoption, the evaluation had been published for about six months and the national delegates of the Working Party on Development Cooperation and International Partnerships (CODEV-PI, formerly CODEV) could themselves have easily become acquainted with its conclusions about the lack of evidence on the functioning of PCD.

The perception of which EU institution should be a leader on PCD has clearly changed. According to its administrators, PCD is ‘always in the background’ as a ‘prominent principle’ in CODEV-PI, at an ‘abstract level’⁹¹. It is perceived less so by some national delegates, though⁹². In contrast to the Working Party on Agenda 2030 (the Agenda for Sustainable Development - B24), established in 2017, which regularly meets with other working parties to work on issues such as agriculture and health, for example, CODEV-P remains focused on a narrower implementation of the development policy, albeit PCD does fall within its competences⁹³.

Assessment ■□□

While the Council of the EU still reacts positively towards PCD, it has abandoned its leading role of inviting the Commission to report on better implementing of PCD and moreover seems to assess its efforts as largely sufficient. It is therefore off track in regard to improving the functioning of PCD. Hence, it is currently unclear as to what extent CODEV-PI, the Working party responsible, is aware of PCD’s efficacy, which is now seen very much as an issue within the Commission’s exclusive competences. Regarding PCSD, the working parties’ joint sessions present good opportunities to advance the PCD agenda at a decision-making level. While complementarity with the OECD is desirable, the Council is also instrumental in taking all Member States on board to implement PCD at a political level. Regarding the low-key presence of PCD on the agenda of the Working party, a direct upgrade of the agenda straight to the European Council – as suggested by the EP – seems to be ambitious but a regular discussion of PCD at the informal meetings of development ministers may be the best level to reignite debate. Although the role of the Council’s rotating Presidencies has decreased due to various treaty reforms, Member States still may raise the issue of PCD as a priority of their respective presidencies and put it on the agenda of both Working Parties and informal ministerial meetings.

4.2.3 Resolutions by the European Parliament

Lessons learnt

Among all European institutions, the EP is comparatively the most active in recognising PCD’s importance as part of an inherently political agenda and not just a technical issue. In 2016 it called ‘for PCD to be discussed at a European Council meeting in order to foster an interinstitutional debate involving the

⁸⁹ Council of the European Union, ‘[Council Conclusions on Policy Coherence for Development \(PCD\)](#)’, 9132/19, 16 May 2019, p. 2.

⁹⁰ Council of the European Union, ‘[Council Conclusions on Policy Coherence for Development \(PCD\)](#)’, 9132/19, 16 May 2019, p. 3.

⁹¹ Council of the European Union, Interview with officer, DG RELEX, 20 July 2022.

⁹² EU Member States Permanent Representation, Interview with representative to CODEV, 14 September 2021.

⁹³ Council of the European Union, Interview with officer, DG RELEX, 20 July 2022.

Commission, the EEAS, the Council, and Parliament, as well as debate at the national level⁹⁴. In spite of the generally low awareness of PCD issues by most incoming Members of the European Parliament (MEPs) after every election, the Committee on Development (DEVE) keeps a strong institutional memory to promote PCD⁹⁵.

Recent progress

Since the 2016 Resolution, DEVE's activities towards a more systemic approach to PCD in the EU have been limited. After the 2019 election, the intensity of PCD-specific activities increased only when a new MEP was appointed as PCD rapporteur in January 2022. However, DEVE was the EP's only topical committee to provide a comprehensive opinion on BR, thus emphasising its role for improving the EU's external governance⁹⁶. Its recommendations, as well as the Parliament's commitment for DEVE to become guarantor of PCD, were reflected in the final resolution⁹⁷. PCD also features quite prominently in previous studies commissioned by DEVE⁹⁸.

Assessment ■■■■

To continue its leading role in promoting the implementation of PCD by other European institutions, the EP, and particularly DEVE, should set an example by formulating a plan on inter-committee consultations via meetings and opinions on proposals. The resolutions also play a role of reporting and monitoring as the EP plays the role of watchdog *vis-à-vis* the EC. However, in spite of the strong institutional memory in DEVE's secretariat, the level of activities still depends on the PCD rapporteur's commitment, which puts at risk the role of the EP as a whole in promoting PCD.

4.2.4 Joint statements

Lessons learnt

Joint statements issued by the EC, EP, Council of the EU and the representatives of Member States combine to form a powerful tool which signifies political commitment to a shared vision. The original European Consensus on Development from 2005 defined both shared objectives and the division of labour for the first time after more than 40 years since the start of development cooperation provided by the European institutions⁹⁹. For instance, PCD figured quite prominently in paragraphs 25 to 38.

Recent progress

In spite of basic clarifications on the role of PCD in a sustainable development era, the New European Consensus on Development from 2017 did not go far enough in defining political commitments to PCD and advancing the PCD agenda, thereby putting use of this tool at risk.

⁹⁴ European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, p. 3.

⁹⁵ European Parliament, Interview with two officers, 6 September 2022.

⁹⁶ European Parliament, ['Opinion of the Committee on Development for the Committee on Legal Affairs on Better Regulation: Joining Forces to Make Better Laws'](#), 2021/2166(INI), 23 February 2022.

⁹⁷ European Parliament, ['Resolution of 7 July 2022 on Better Regulation: Joining Forces to Make Better Laws'](#), P9_TA(2022)0301, 7 July 2022.

⁹⁸ J. Mackie and G. Allwood, [The Implementation of the 2030 Agenda's Principles of "leaving-no-one-behind" and "addressing the needs of those furthest behind first" in the EU's development policy](#), Policy Department for External Relations Directorate General for External Policies of the Union, PE 653.657, January 2022.

⁹⁹ European Union, ['Joint statement by the Council and the representatives of the governments of the Member States meeting within the Council, the European Parliament and the Commission on European Union Development Policy: The European Consensus'](#), Official Journal of the European Union, 2006/C 46/01, 24 February 2006.

Assessment ■■■■

The 2017 European Consensus on Development clarified PCD *vis-à-vis* PCSD but joint statements should now be used for clarifying the EU's depth of commitment to PCD.

4.3 Policy effects

4.3.1 Ex-ante Impact assessments

Lessons learnt

By correlating between the inclusion of effects on developing countries in Impact Assessments (IAs) and reflecting on development concerns in draft policies, the 2018 external evaluation underlined IAs as a PCD mechanism 'of central importance'¹⁰⁰. Based on a review of a sample of IAs made by EPRS between 2015 and 2018, it was concluded that their quality had generally increased over this period but there remained considerable scope for improvement¹⁰¹. More specifically however, the external evaluation still identified explicit references to impacts on developing countries in only half of the selected sample selected according to PCD relevance criteria. Moreover, including the concerns of developing countries were 'rarely a direct result of PCD mechanism [sic]', the 2018 evaluation concluded. It was rather political will 'from the onset of the policy formulation process' that was associated with the inclusion of development impacts in the IA and the final policy¹⁰². Previously, academic research also indicated that 'IAs are inherently political processes, and that the promotion of PCD is not a matter of solving problems but more one of managing different interest groups, with the more powerful ones generally prevailing'¹⁰³. A briefing commissioned by the EP recommended that IAs should be more participatory¹⁰⁴. Paradoxically, trade impact assessments which are not directly subject to scrutiny under BR seem to be of better quality, due to a fixed structure, similarly to Sustainability Impact Assessments (SIAs). For example, in the latest 2017 IA on the EU-Australia trade agreement, the expected 0.2 % decrease in exportations from the developing countries in the Pacific, as suggested by the quantitative model, was further discarded as an error by the qualitative analysis of export structures of Australia and the neighbouring developing countries¹⁰⁵.

Recent progress

In line with the 2019 Council Conclusions, the EC emphasised that its main PCD efforts are focused on being included in IAs and interservice consultations¹⁰⁶. This approach includes a daily overview of the Commission's proposals and complements the more visible Tool #35 of the BR Toolbox. There is as yet no authoritative quantitative analysis available to prove that the ratio of implicitly and explicitly PCD-informed assessment has changed. Indeed, case studies show that the depth of analysis and/or measures for

¹⁰⁰ C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 69.

¹⁰¹ European Parliament Research Service, [Appraising the Quality of the European Commission's Impact Assessments Trends and Developments from 2015 to 2018](#), Study, PE 642.807, December 2019.

¹⁰² C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 70.

¹⁰³ M. Carbone and N. Keijzer, 'The European Union and Policy Coherence for Development: Reforms, Results, Resistance'. *The European Journal of Development Research*, Vol 28, No 1, 2016, pp. 30–43.

¹⁰⁴ M. Carbone, 'The European Union and Policy Coherence for Development: High on Mechanisms, Low on Achievements, Briefing by Maurizio Carbone', in European Parliament, [EU Policy Coherence for Development: The challenge of sustainability](#), Workshop, 2016, p. 18.

¹⁰⁵ European Commission, [Recommendation for a Council Decision authorising the opening of negotiations for a Free Trade Agreement with Australia](#), Staff Working Document, SWD(2017) 293 Final, 13 September 2017.

¹⁰⁶ European Commission, Interview with officer, 12 July 2022; European Commission, Interview with two officers, 20 July 2022.

mitigating the negative impacts of EU policies are still limited (see Section 5). At the time of writing in September 2022, there is still no member of the Regulatory Scrutiny Board with a development background to quantify the presence and quality of PCD assessments¹⁰⁷.

Assessment ■■■■

The partial use of IAs can be explained mostly by the limited capacities of DG INTPA. The input by thematic units can be put in contrast with a dedicated unit of about 10 officers at DG ENV that systematically and successfully manages to put a biodiversity lens to impact assessments¹⁰⁸. The formulation of some IAs quoted in case studies shows that there is no consideration of the need to change policies to accommodate any negative impacts on developing countries. Consequently, the use of technical assistance or development cooperation generally is often recommended as the main mitigation tool¹⁰⁹. In other words, IAs often do not take into account alternatives to a pre-selected course of action.

4.3.2 Reporting by EU Delegations

Lessons learnt

By 2018, external evaluation had assessed the role of EUDs as being ‘very limited’. Considering that the mechanisms that have been used by some EUDs to provide feedback to the Commission’s 2015 PCD Report should be extended to all EUDs and that this should become an annual exercise, this calls on the EUDs to ensure that ‘PCD is on the agenda of the respective bilateral and joint assembly meetings’¹¹⁰.

Recent progress

Progress Reports are not publicly available and no internal documents were made available to us for scrutiny by DG INTPA for the purposes of this in-depth analysis during the research phase, so their quality cannot be assessed. However, according to the limited number of interviews, their quality seems to be uneven among delegations as well as in time due to personnel rotations and in line with the varying degrees of awareness of PCD issues among the staff of EUDs¹¹¹. Moreover, knowledge on the use of these reports by DG INTPA is very low. In reality, DG INTPA hires an external consultant to summarise the PCD responses from Progress Reports¹¹². This also means that the European Commission commits expenditure to external expertise on PCD. However, this report is not publicly available and beyond being an extensive source for a very short summary in PCD reports, its use is unclear and non-transparent. The 2020 and 2021 Annual activity reports by DG INTPA do not make any general mention of PCD in the main reports and the annexes¹¹³.

In addition, none of the five contacted EUDs reported that there was direct feedback from DG INTPA on the PCD-related answers in the Progress Report by the EUDs, unlike the situation with management reports where it seems to be more frequent¹¹⁴. It is also unclear whether the Progress Report questionnaire provides sufficient guidance to include both impacts and policy dialogue.

¹⁰⁷ See European Commission, [Members of the Regulatory Scrutiny Board webpage](#), accessed 17 August 2022.

¹⁰⁸ See European Commission, Interview with officer, 13 September 2022.

¹⁰⁹ M. Carbone, ‘The European Union and Policy Coherence for Development: High on Mechanisms, Low on Achievements, Briefing by Maurizio Carbone’, in European Parliament, [EU Policy Coherence for Development: The challenge of sustainability](#), Workshop, 2016, p. 19.

¹¹⁰ European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, p. 3.

¹¹¹ EU Delegation, Interview with diplomat, multiple.

¹¹² European Commission, Interview with officer, 13 September 2022.

¹¹³ European Commission, [Annual activity report 2020 – International Partnerships](#), intpa_aar_2020_final, 8 June 2021.

¹¹⁴ EU Delegation, Interview with diplomat, all dates.

The delegations also remain siloed, which again puts EU cooperation to the test against other actors such as the United Kingdom that has developed specific expertise on sustainable energy, while EUDs' expertise remains divided among officers specialised in energy, climate and social development respectively¹¹⁵. Conversely, taking into account that policy-making in many developing countries remains highly syllogised as well, by creating projects that necessitate cooperation between two or more ministries of the partner country, the Delegations can support better governance and more coherent approaches, thereby transferring policy coherence by the very processes of development cooperation¹¹⁶.

Assessment

The non-availability of data and conflicting awareness of its use paint a rather blurry picture on the value of reporting by EUDs. There is no evidence that the reporting from EUDs: (i) has sufficient quality; and (ii) informs policy-making in any systematic way. Full and fair assessment of the reporting by EUDs is hence impossible.

4.3.3 Ex-post evaluations

Lessons learnt

Ex-post evaluations are understood here as different evaluations that cover various EU policies with an impact on developing countries. They are not understood as evaluations of the umbrella PCD system which fall under the building block Monitoring and Reporting (see Section 4.6). Major ex-post evaluations have been carried out by the Commission in the area of trade since 2012¹¹⁷. Other evaluations are made on ad hoc basis with rather extensive consultations.

Recent progress

Nowadays, the trade evaluations include a detailed analysis of the so-called sustainable development pillars, namely economic, social and environmental issues, including the gender dimension and evaluations of trade agreements with middle-income countries, together with evaluations of impacts on third countries and least developed countries (LDCs). The ad hoc ex-post evaluations show as mixed of a picture as the general impact assessments. For example, the very recent evaluation of the EU Biodiversity Strategy to 2020 has a part dedicated to coherence, including coherence with development cooperation, other EU's policies and the contribution to SDGs, but not PCD¹¹⁸. In other words, the evaluation assesses 'policy coherence for biodiversity' with, among others, trade, agriculture and fisheries, which are an important source of income in developing countries. This is another example of environment-related initiative where the impact on social, rather than purely environmental aspects, is overlooked.

Assessment

The overall picture is mixed due to two types of evaluations. The quality of trade-related ex-post evaluations is outstanding and stable which is due to a one-size-fits-all methodology developed for assessing the impacts of trade agreements¹¹⁹. These evaluations go far beyond the economic impact of the EU's trade agreements with its partners in developing countries, albeit they often mention that the social impacts of the EU's trade policy are difficult to quantify and separate from other factors. Some evaluations are carried out by external consultancy companies, which means that there are finances earmarked for this

¹¹⁵ EU Delegation, Interview with diplomat, 12 September 2022.

¹¹⁶ EU Delegation, Interview with diplomat, 12 September 2022.

¹¹⁷ See European Commission, [Ex-Post Evaluations webpage](#), n.d.

¹¹⁸ European Commission, [Evaluation of the EU Biodiversity Strategy to 2020](#), Staff Working Document, SWD(2022) 285 Final, 6 September 2022.

¹¹⁹ See European Commission, [Impact Assessments webpage](#), accessed on 4 September 2022.

type of evaluation. Given the generally high quality of external assessments, as also acknowledged by SEC GEN¹²⁰, a more widespread use of external PCD evaluations and assessments may be considered, with the usual dilemma related to the issue of needing to outsource assessment without developing internal capacities. It is unclear, though, to what extent and how these evaluations are used by DG INTPA. It should be noted that these evaluations do not fall under the scrutiny of the BR unit at SEC GEN, which means that the Directorate-General for Trade was methodologically more advanced than other DGs. Most recent examples show that the consideration of ‘coherence’ in evaluations do not include PCD in spite of it being a treaty obligation. Evaluations include extensive consultations but they do not seem to be extensively used by developing countries.

4.3.4 Better Regulation Guidelines and Toolbox

Lessons learnt

The 2018 External Evaluation did not find any evidence that the 2015 introduction of tool #34 Developing countries (formerly #30, currently #35) had any impact related to PCD¹²¹. Moreover, as already noted in relation to the impact assessment, it was not clear to what extent the tool was used¹²². In any case, the tool presents methodological guidance at a level of detail, that could even be used by EUDs as support for their annual PCD assessments. Despite this, the Delegations themselves report that there is insufficient guidance¹²³. The evaluation also pointed out that the former tool #34 was only advisory, unlike the Guidelines where PCD was not even mentioned¹²⁴.

Recent progress

Following on from the 2017 version of Guidelines, which did not refer to PCD even indirectly¹²⁵, the 2021 version includes impacts on ‘non-EU countries’ as part of general economic, social and environmental impacts¹²⁶. Moreover, it was stated that evaluations should, whenever possible, ‘include a reference to the UN SDGs that the intervention aimed to address’¹²⁷. In line with this, DG INTPA considers that Tool #18 Identification of impacts, currently giving guidance for evaluating impacts on SDGs, is not less important than tool #35¹²⁸. It is still regrettable, though, that unlike the 608-page Toolbox, these Guidelines do not refer to Article 208 of the TFEU as a legal basis for the obligation to include any impact on developing countries in the proposal.

It is also important to stress that the character of PCD as a treaty obligation does not mean much in terms of policy relevance in the competition of different DGs to include their legal or non-legal aspects of assessment in the BR Guidelines that are coordinated by SEC GEN. The use of tool #35 can hence be considered as ‘partly optional’ and its use should be the product of a ‘common sense approach’¹²⁹. The SEC GEN also considers Tool #35 Countries as less important than #18 for the key reason that the latter

¹²⁰ European Commission, Interview with officer, 9 September 2022.

¹²¹ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 20.

¹²² C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 28.

¹²³ EU Delegation, interview with diplomat, all dates.

¹²⁴ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union’s Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 52.

¹²⁵ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2017) 350, 7 July 2017.

¹²⁶ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2021) 305 Final, 32.

¹²⁷ European Commission, [Better Regulation Guidelines](#), Staff Working Document, SWD(2021) 305 Final, 27.

¹²⁸ European Commission, Interview with officer, 20 July 2022.

¹²⁹ European Commission, Interview with officer, 13 September 2022.

must be dealt with by DGs in the impact assessment form. Tool #18 is also an improvement progress as it is integrative in comparison to the former separate assessment of the three pillars of sustainable development.

Assessment ■■■

While the binding outcomes of the BR initiative do not yet institutionalise the legal and political commitment to PCD, they are on track towards linking PCD with the policy assessment processes. Revision of the BR documents will require stronger political commitment.

4.3.5 Sustainability Impact Assessments

Lessons learnt

Commissioned since 1999, SIAs are similar to trade ex-post evaluations, but they are carried out an earlier stage of the policy cycle. They are referred to but not specifically analysed in the 2018 external evaluation.

Recent progress

SIAs do not fall under BR and hence the control of SEG GEN and the Regulatory Scrutiny Board¹³⁰. Since they are used as an input in trade negotiations, they are confidential and published only upon the conclusion of negotiations, only initial, reduced assessments are made public before the negotiations¹³¹.

Assessment ■■■

As for ex-post trade evaluations, the three-pillar focus on non-EU countries and regions, combined with a robust methodology is a potentially important PCD tool.

4.3.6 European Parliament's assessments

Lessons learnt

The EP also has the ability to carry out its own ex-ante impact assessments and ex-post policy evaluations, the role of which has been steadily growing over the years¹³². One of the EP's activities relevant to PCD consists in systematically appraising the quality of all EC impact assessments and providing committees with impact assessment products on request. Services related to impact assessments are carried out by the Ex-Ante Impact Assessment Unit of the European Parliamentary Research Service (EPRS). For the 2015-2018 period, EPRS generally found that the IAs score worst on the analysis of all relevant direct and indirect impacts with a lower focus on social and environmental aspects¹³³. It is important to stress that social impacts as such, and not necessarily in the external dimension, were either partly tackled, or sometimes not at all, in as much as 39 % of IAs reviewed during this period¹³⁴. Interestingly, the EC's problems in fully assessing the impacts *outside* the EU finds a parallel in the weak assessment on diverse territorial impacts

¹³⁰ European Commission, Interview with officer, 13 September 2022.

¹³¹ European Parliament, Interviews with two officers, 20 September 2022.

¹³² I. Anglmayer and A. Scherrer, 'Ex-Post Evaluation in the European Parliament: An Increasing Influence on the Policy Cycle', *The Journal of Legislative Studies*, Vol 26, No 3, 2020, pp. 405–426.

¹³³ European Parliament Research Service, [Appraising the Quality of the European Commission's Impact Assessments Trends and Developments from 2015 to 2018](#), Study, PE 642.807, December 2019, p. 29.

¹³⁴ European Parliament Research Service, [Appraising the Quality of the European Commission's Impact Assessments Trends and Developments from 2015 to 2018](#), Study, PE 642.807, December 2019, p. 12.

inside different EU regions. Territorial impacts were considered in around 11 % of IAs reviewed, while potential impacts on third countries were covered in almost 40 % of IAs appraised by EPRS in this period¹³⁵.

Recent progress

The EP's criteria for appraisals follows the EC's criteria for impact assessments set out in the Commission's own Better Regulation guidelines as well as EP resolutions. Hence, in the past there was no particular focus on developing countries beyond the general focus on third countries. Recent revision has resulted in a much-improved focus, which was followed by the most recent update to the BR Guidelines. There are other, more notable cases of impacts being scrutinised on which the EP places greater importance than the Commission, such as: impacts on gender; small- and medium-sized enterprises; and impacts outside the Union¹³⁶. The Parliament's impact assessment handbook which is approved by the Conference of Committee Chairs contains the quality criteria that should, according to Parliament, be met by Commission IAs. In particular cases, according to the inter-institutional Agreement for Better Law-making, last updated in 2017, as well as the EP's IA Handbook, Committees also can request the EC to undertake additional assessments, or the EPRS to undertake or commission its own impact assessments that can be outsourced to experts in the area¹³⁷. An example of this was an [impact assessment](#) of the EC's New Pact on Migration and Asylum¹³⁸. In addition to EPRS's appraisals, DEVE informally carries out its own additional PCD screening of relevant IAs¹³⁹.

Assessment ■ ■ ■ □

In light of the new BR tools' policy cycle, it is too early as yet to appraise the use of tool #35 in the EC's IAs. DEVE can in principle make use of the EP's procedures to produce a greater focus on PCD in the EC's assessment and even request additional IAs, but without legislative power its relevance for major initiatives is limited. Furthermore, DEVE's ability to set up additional assessments declines when it is not the lead Committee for specific initiatives, which by definition includes those with PCD-relevance. Moreover, in many cases where DEVE is not directly dealing with a file or can claim official association, it would need to request other Committees to initiate additional assessments with EPRS. However, sustained attention by DEVE to PCD issues, possibly combined with the Committee on Constitutional Affairs (AFCO) for clarification of the legal obligation and with the support of other committees, could lead to stronger formalisation of PCD in EPRS assessment work. Accordingly, impacts on developing countries could be explicitly included as a standalone criterion within the IA Handbook, a far more prominent place than currently given under the BR Guidelines. This could, though, meet some resistance for proportionality reasons (proportionality being also recalled in the Inter-institutional Agreement on Better Law-Making), as the impact on developing countries is not systematically relevant¹⁴⁰. Nevertheless, through its communication with the SEC GEN's Regulatory Scrutiny Board, EPRS could contribute to a stronger focus on PCD in the EC's assessments. Since the status and location of responsibility for PCD as a treaty obligation

¹³⁵ Territorial impacts were considered in 15 out of the 132 IAs reviewed and potential impacts on third countries were addressed in 52 of the 132 appraised by EPRS in this period, see European Parliament Research Service, [Appraising the Quality of the European Commission's Impact Assessments Trends and Developments from 2015 to 2018](#), Study, PE 642.807, December 2019, p. 14

¹³⁶ European Parliament, Interview with two officers, 20 September 2022.

¹³⁷ European Parliament, [Impact Assessment Handbook, Guidelines for Committees](#), 12 September 2017.

¹³⁸ European Parliament, Interview with two officers, 20 September 2022.

¹³⁹ European Parliament, Interview with two officers, 6 September 2022.

¹⁴⁰ European Parliament, Interview with two officers, 20 September 2022.

is not clearly delineated and mandatory in all appraisals, this study assesses the EP's work on IAs at the same level as that of the EC.

4.4 Policy coordination

4.4.1 Interservice consultations

Lessons learnt

The 2018 external evaluation noted that the Inter-service consultation (ISC) process quality had improved from 2009 to 2016, but the participation of the Directorate-General International Cooperation and Development was not systematic¹⁴¹. Moreover, the latter did not possess any capacities in terms of times and technical skills to become sufficiently involved in ISCs¹⁴². An important distinction was made between informal and formal processes.

Recent progress

While there is no PCD-related ISC, evidence on DG INTPA's more general quantitative involvement in ICs was not made available during the research phase of this study. Formal negative opinions are used as means of last resort and most disagreements with other DGs are resolved informally, yet respondent could not quantify their use. Interestingly, the cases of disagreement that were most often raised in the interviews were not those with other DGs, but with the EP. This was especially so in diverse cases that would translate into more aid conditionality, such as the non-respect of the Generalised Scheme of Preferences provisions as an event that could lead to the withdrawal of aid – this indicates DG INTPA's path-dependent tendency to prioritise aid-related issues over structural problems. However, it seems that ISCs are generally facilitated by the fact that SDGs are now 'well integrated across the board'¹⁴³. The EGD has also been an eye-opener for other DGs in regard to the extent of PCD impacts¹⁴⁴. A bigger role for the ISC was also confirmed by SEC GEN¹⁴⁵. The SEC GEN indicated that it now strives for being as inclusive as possible from the outset of initiatives, while DG INTPA makes part of the Group des relations inter-institutionnelles. The other DGs involved would themselves be conscious about the policy's potential impacts. This is seen as a positive outcome of the different DGs taking responsibility for their respective SDGs¹⁴⁶.

More generally, despite the recent crises, EGD momentum was maintained to the general satisfaction of all throughout the EC¹⁴⁷, albeit the procedures for EGD initiatives are no different¹⁴⁸. Consequently, it may be that the drivers towards policy coherence happen to stem from different motivations, for instance an internal need such as waste reduction and the circular economy¹⁴⁹. In this case, the negative externalities of the exported waste are mitigated by a pragmatic domestic need to turn waste into resources. It is also difficult to evaluate the result of 'diluting' former PCD capacities into a thematic reorganisation of DG INTPA with the expectation that its directorates would be more active on concrete agendas¹⁵⁰. This change was

¹⁴¹ C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 29.

¹⁴² C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 32.

¹⁴³ European Commission, Interview with officer, 20 July 2022.

¹⁴⁴ European Commission, Interview with officer, 12 July 2022.

¹⁴⁵ European Commission, Interview with officer, 30 August 2022.

¹⁴⁶ European Commission, Interview with officer, 30 August 2022.

¹⁴⁷ European Commission, Interview with officer, 30 August 2022.

¹⁴⁸ European Commission, Interview with two officers, 20 July 2022.

¹⁴⁹ European Commission, Interview with officer, 15 September 2021.

¹⁵⁰ European Commission, Interview with officer, 15 September 2021.

actually motivated by the desire for a change of internal culture that used to work in silos¹⁵¹. There is also a perception in the EC that the EP and the Council do not have any system to assess amendments proposed by the Parliament¹⁵².

In terms of capacities, it must be emphasised that the recent reorganisation of DG INTPA has led to a drastic reduction of PCD capacities with only a part-time officer working explicitly on PCD issues, whereas this was formerly a full-time function. The team that had a varying number of several officers was reduced by appointing the remaining persons to thematic units¹⁵³. While the intention to 'integrate' PCD in the day-to-day work of the thematic units is understandable, it has led to further decentralisation and dispersion of PCD-related knowledge¹⁵⁴. The reorganisation related to transforming DG DEVCO into DG INTPA supported thematic units at the expense of tasks that are necessary for a transparent and impactful PCD.

Finally, it must also be emphasised that ISCs are variable for the crucial reason that there are no PCD focal points at different DGs, but only an informal network based on membership in the Interservice Group on SDGs where PCD is regularly raised. This group may usually meet one or two times per year, but it now meets every one or two months in the run-up to the voluntary reviews at the upcoming 2023 UN High Level Political Forum on Sustainable Development (HLPF) in New York¹⁵⁵. While it also participates on the identification of the relevant initiatives from the running programme, the variance of the frequency of its meeting suggests a strong focus on reporting.

Assessment □□□

SDG mainstreaming among other DGs seems to facilitate ISCs. However, without the availability of data on DG INTPA's involvement in ISCs, any effectiveness of this PCD tool cannot be fairly and fully assessed.

4.4.2 Tracking of the EC Work Programme

Lessons learnt

Described as 'CWP screening' in the external evaluation, the current Commission Work Programme's tracking process was evaluated as inefficient because even norms that were marked as PCD-sensitive were not further analysed in IAs. Accordingly, it was recommended that PCD screening should become formal and binding with a follow up mechanism linking it to the IA and ISC processes¹⁵⁶.

Recent progress

The internal tracking documents were not made available by DG INTPA even for research purposes so during the research phase of this study the tracking tool could not be fully evaluated. A sample made available by DG INTPA to the author at a later stage suggests that initiatives are not tracked explicitly from a PCD perspective, but from the perspective of more general relevance that includes PCD but mainly impacts the EU's development cooperation and even the geopolitical dimension. This information is not centralised but also processed in thematic units¹⁵⁷. In 2014, though, the document was shared with

¹⁵¹ European Commission, Interview with two officers, 20 July 2022.

¹⁵² European Commission, Interview with officer, 15 September 2021.

¹⁵³ European Commission, Interview with officer, 13 September 2022.

¹⁵⁴ European Commission, Interview with officer, 13 September 2022.

¹⁵⁵ European Commission, Interview with officer, 13 September 2022.

¹⁵⁶ C. Núñez-Borja, E. Baudelet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 72.

¹⁵⁷ European Commission, Interview with officer, 13 September 2022.

Member States¹⁵⁸. DG INTPA describes the 'tracker' as a continual process that is carried out jointly with the Council's Directorate-General for External Relations¹⁵⁹.

Assessment □□□

Interestingly, this deinstitutionalisation of the tracking process may be a long-term undertaking because there were even specific PCD Work Programmes for each topical area between 2010 and 2013¹⁶⁰. In any case, the tracking documents' non-availability is a major obstacle for any evaluation of the PCD system's policy coordination section and there is limited evidence that the initiatives are not screened from an explicit PCD perspective, but a more general assessment of relevance to DG INTPA. According to the SEC GEN, in addition to the annual screening of the Work Programme, a quarterly PCD screening of the list covering minor or previously unannounced initiatives should also be performed¹⁶¹. This possibility was not even raised by DG INTPA in interviews.

4.4.3 European Parliament's internal coordination

Lessons learnt

In 2016, the last available PCD resolution stressed 'the important role that Parliament must play in the process of promoting PCD by giving it priority in its agendas, increasing the number of meetings between committees and parliaments relating to PCD, promoting exchanges of views on PCD with partner countries and fostering dialogue with civil society', thus emphasising participation¹⁶². A previous study commissioned by DEVE suggested that EP Committees beyond DEVE appoint standing rapporteurs on policy coherence so that each committee has a responsible rapporteur looking at coherence between EU internal and external policies¹⁶³.

Recent progress

In the period 2019-2021, with DEVE's opinions tabled or directly proposed, the EP suggested that the EC should enforce PCD specifically for initiatives concerning: the 'farm to fork' strategy; the role of the EU's development cooperation and humanitarian assistance in addressing various consequences from the COVID-19 pandemic; the development policy's role in responding to biodiversity loss in developing countries; as well as corporate due diligence and corporate accountability. Regarding this final issue, the Commission has yet to respond. DEVE asked to be become involved in the corporate responsibility initiative led by the Committee on Legal Affairs but its request was not granted. More generally, PCD is not taken very seriously by some other EP committees, including the Committee on Civil Liberties, Justice and Home Affairs. Informal preparatory meetings involving DEVE take place on important files otherwise but the lack of clarity on PCD leads to different treatments. Whilst any conflicts may then be escalated to the Conference of Committee Chairs, DEVE also needs to be selective and specify its priorities since it cannot push on all agendas equally, thus reflecting similar issues faced by DG INTPA within the EC¹⁶⁴. By contrast,

¹⁵⁸ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 36.

¹⁵⁹ European Commission, Interview with two officers, 20 July 2022.

¹⁶⁰ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018, p. 39.

¹⁶¹ European Commission, Interview with officer, 13 September 2022.

¹⁶² European Parliament, [Resolution of 7 June 2016 on the EU 2015 Report on Policy Coherence for Development](#), P8_TA(2016)0246, 2016, p. 3.

¹⁶³ J. Mackie, G. Allwood, [The implementation of the 2030 agenda's principles of 'leaving-no-one-behind' and 'addressing the needs of those furthest behind first' in the EU's development policy](#), PE 653.657, January 2022, p 54.

¹⁶⁴ European Parliament, Interview with two officers, 6 September 2022.

the Committee on International Trade provides a good example of SDGs' mainstreaming as well as more critical approaches towards international trade 'post-COVID-19'. Many considerations beyond a traditional focus on the EU's economic growth, from human rights to LDCs, are now raised on the committee's agenda, which does not necessarily copy political priorities related to MEPs and their political groups¹⁶⁵.

Assessment ■ ■ ■ □

The challenges with policy coordination at EP level are similar to those met by DG INTPA at EC level. Due to the lack of clarity and inconsistent activity by successive PCD rapporteurs over time, DEVE's inclusion on important files is not automatically granted. Moreover, the screening of initiatives is also taking place ad hoc, leading to the assessment being marked as 'at risk'.

4.4.4 Training and awareness-raising activities

Lessons learnt

According to the 2018 external evaluation, there was no evidence that PCD awareness-raising activities had had any direct impact on policy-making¹⁶⁶.

Recent progress

The EC offers a one-hour e-learning course on PCD¹⁶⁷. It has not been updated for some years and it does not take into account recent developments such as BR tools¹⁶⁸. Data on its use are not systematically monitored¹⁶⁹. DG INTPA organised the last in-person training for the EP in 2019¹⁷⁰. Since then, however, in 2020 it organised two training sessions for EC staff on the use of BR methodology in IAs. At public level, PCD has not featured as part of the programme in any edition of European Development Days since 2018¹⁷¹. In recent years, DG INTPA has not actively initiated awareness activities but did respond to invitations, such as those from CSOs. Some reported activities do not directly link to PCD. For example, looking at the impacts on developing countries, reported research on policy coherence funded by Horizon 2020 Europe focused primarily on the EU¹⁷². While the frequency of biannual reports decreased, in light of the missing 2017 edition, DG INTPA considers PCD reports – which should also play the planning and monitoring role – as a crucial element of its awareness activities.¹⁷³

Vis-à-vis EEAS, PCD was reported as an integral part of the annual week-long cooperation meeting of representatives from Delegations, including those at the level of Heads of Cooperation, yet this was not spontaneously mentioned by the Delegations themselves. Some EUDs rather reported that knowledge about PCD is highly personalised, which also corresponds to the uneven quality of PCD responses in Progress Reports. The SEC GEN appreciated that DG INTPA had initiated the establishment of the SDG

¹⁶⁵ European Parliament, Interview with officer, 29 September 2022.

¹⁶⁶ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\). Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.

¹⁶⁷ See European Commission, [Development Policies Courses webpage](#), 2022.

¹⁶⁸ European Commission, Interview with officer, 13 September 2022.

¹⁶⁹ European Commission, Interview with officer, 13 September 2022.

¹⁷⁰ European Commission, Interview with officer, 13 September 2022.

¹⁷¹ European Commission, [Women And Girls At The Forefront Of Sustainable Development: Protect, Empower, Invest](#), European Development Days 2018. Proceedings, 2018; European Commission, [Addressing inequalities: Building a world which leaves no one behind](#), European Development Days 2019. Proceedings, 2019; European Commission, [The Green Deal for a Sustainable Future](#), European Development Days 2021. Proceedings, 2021; European Commission, [European Development Days 2022. Proceedings](#), 2022.

¹⁷² See CASCADES, [Methodologies](#), n.d.

¹⁷³ European Commission, Interview with officer, 13 September 2022.

Mapper¹⁷⁴. This is a resource developed by the EC's Joint Research Centre with DG INTPA for other DGs on SDGs that may be related with their respective proposals¹⁷⁵.

Assessment ■□□

There is little evidence that training and awareness-raising activities have increased in intensity since the 2018 external evaluation; the role of DG INTPA seems to be purely reactive due to limited PCD capacities.

4.5 Participation

4.5.1 Reporting by Member States

Lessons learnt

The 2018 OECD's peer review of EU development policy criticised Member States' reporting as being 'uneven'¹⁷⁶.

Recent progress

With PCD reporting being subsumed into PCSD reporting by some Member States, the quality of replies by the Member States declined¹⁷⁷.

Assessment ■□□

Due to general stagnation and the low quality of reports, any participation by Member States through this one-way tool is clearly off-track.

4.5.2 Policy dialogue with partner countries

Lessons learnt

Despite Article 12 in the Cotonou Agreement, the 2018 external evaluation recognised that policy dialogue with partner countries was scarce, especially at the early stages of policy formulation¹⁷⁸. Civil society strongly appreciated multi-stakeholder discussions on sustainable development under the former Commission but these were not renewed by the current one¹⁷⁹. They had carried the advantage of being able to vehicle the interests of CSOs' partners in the global South directly to a central level within the EU.

Recent progress

Due to limited samples from EUDs, it is difficult to generalise and draw any conclusions on the state of PCD dialogue. However, in a number of cases there were references to Delegations' difficulties in addressing the links between market access and poor governance as well as human rights and environmental violations. According to the EUD in Senegal, for instance, policy dialogue with CSOs and political parties is

¹⁷⁴ See European Commission, [SDG Mapper](#), n.d.

¹⁷⁵ European Commission, Interview with officer, SEC GEN, 9 September, 2022.

¹⁷⁶ OECD, [OECD Development Co-Operation Peer Reviews: European Union 2018](#), Development Assistance Committee, 10 December 2018.

¹⁷⁷ European Commission, Interview with officer, 13 September 2022.

¹⁷⁸ C. Núñez-Borja, E. Baudalet, and T. Picarello, [External Evaluation of the European Union's Policy Coherence for Development \(2009-2016\), Final Report – Volume I: Main Report](#), Evaluation carried out on behalf of the European Commission by the Evaluation Unit of the Directorate-General for International Cooperation and Development, July 2018.

¹⁷⁹ CONCORD Europe, Interview with officer, 16 September 2021.

needed to counter disinformation in media and social networks¹⁸⁰. Further examples are mentioned within the case studies.

Assessment ■■■□

This assessment reflects the diversity among EUDs in their engagement with stakeholders. Requirements from headquarters do not incentivise Delegations to formalise planning and reporting of the policy dialogue on PCD.

4.5.3 NDICI–Global Europe

Lessons learnt

NDICI-Global Europe entered into force only in mid-2021 so there are very few lessons learnt from the past.

Recent progress

The Regulation on Global Europe – Neighbourhood, Development and International Cooperation Instrument – reinstates the PCD principle¹⁸¹. However, the extent to which PCD aspects under former instruments differ from the current version is not yet clear. There is no PCD-specific mechanism to ensure that cooperation programmes reflect the need to mitigate or complement policy impacts of the EU in the partner countries. Interviews with EUDs indicate, however, that this type of programming regularly happens though the information needed to prevent the negative externalities is not always available in time, which puts the PCD-cooperation link at risk¹⁸². For this link between other DGs and EUDs to work, officers from thematic units at DG INTPA would be required to participate in IAs transfer information at joint programming meetings that are held with EUDs and geographic colleagues in EU headquarters¹⁸³.

Assessment ■■■□

The supporting role of NDICI-Global Europe can vary significantly. European development cooperation can support local PCD assessment by strengthening the capacities of central and local governments, academia and civil society to increase policy coherence. This is the case, for example, of projects managed by the EUD in Senegal aimed at improving governance in the fisheries sector with a total volume exceeding EUR 7 million. Most importantly, as the case studies show, development cooperation often remains the only tool that is supposed to mitigate the negative impacts of EU policies. However, the same example of Senegal shows that the extent of these projects can be symbolic. The EU currently supports one milk producer in the North of the country with a budget of EUR 600 thousand, which is largely insufficient to face much criticised importations of subvention milk powder from the EU¹⁸⁴. Yet, delays are taking place due to the unavailability of information and meanwhile the volume of finance needed to achieve the mitigating action through cooperation may largely be insufficient.

¹⁸⁰ EU Delegation, E-mail communication, 23 September 2022.

¹⁸¹ European Union, [Regulations EU 2021/947 of the European Parliament and of the Council of 9 June 2021 establishing the neighbourhood, development and international cooperation instrument – Global Europe](#), OJ L 209, Official Journal of the European Union, Luxembourg, 9 June 2021.

¹⁸² EU Delegation, interview with diplomat, all dates.

¹⁸³ European Commission, Interview with officer, 13 September 2022.

¹⁸⁴ EU Delegation, E-mail communication, 23 September 2022.

4.6 Monitoring and reporting

4.6.1 EU Reports on PCD

Lessons learnt

While the EU's PCD reports have never played the role of policy planning and monitoring, the 2018 external evaluation did represent enormous progress as a specific part of the PCD policy cycle. That said, any evaluation of PCD processes, and especially their outcomes, is challenging because there is no counterfactual situation or in other words no alternative world where EU policies do not impact developing countries¹⁸⁵. In addition, the absence of evidence on PCD in case studies cannot be taken as evidence that the policy had no positive impact on developing countries. However, DG INTPA considered this absence of evidence to be a 'surprise', even though it believes that tracking causal nexuses is tantamount to 'mission impossible'¹⁸⁶. The planning process for 2018's external evaluation was extremely long with the transversal participation of an inter-service committee and it was time-consuming to agree on the Terms of Reference¹⁸⁷. However, investing EUR 400.000 for the external evaluation has delivered a huge amount of evidence (and the absence thereof) for setting policy objectives¹⁸⁸.

Recent progress

Except for arranging priorities, no progress was recorded in the planning and monitoring of PCD (see also subsection 2.2.1). According to a co-author of the 2018 external evaluation, any evaluation should be commissioned and coordinated at a central level, namely by the SEC GEN¹⁸⁹. Monitoring is also uneven, since there was no 2017 PCD report because of a decision at the EC to link documents for the UN HLPF in order to integrate PCD into a larger sustainable development agenda¹⁹⁰.

Assessment ■□□

Any progress on improving the EU's PCD reporting requires primarily clear direction in regard to political commitment.

4.7 Review summary

The progress recorded in each tool and block is summarised here in Table 2.

¹⁸⁵ BKP Development Research and Consulting, Interview with expert, 17 July 2022.

¹⁸⁶ European Commission, Interview with officer, 15 September 2021.

¹⁸⁷ BKP Development Research and Consulting, Interview with expert, 17 July 2022.

¹⁸⁸ See European Commission, [Financial Transparency System data from 2014 to 2021 webpage](#), accessed 17 August 2022.

¹⁸⁹ BKP Development Research and Consulting, Interview with expert, 17 July 2022.

¹⁹⁰ European Commission, Interview with officer, 13 September 2022.

Table 2: Progress review summary

PCSD Building block	EU tool	Score
Political commitment	EC communications	■ □ □
	Council conclusions	■ □ □
	EP resolutions	■ ■ □
	Joint statements	■ ■ □
Policy effects	Ex-ante Impact assessments	■ ■ □
	Delegation Reports	□ □ □
	Ex-post evaluations	■ ■ □
	Better Regulation	■ ■ ■
	Sustainability Impact Assessments	■ ■ ■
	EP assessments	■ ■ □
Policy coordination	EC Interservice consultations	□ □ □
	EC Work Programme tracking	□ □ □
	EP coordination	■ ■ □
	Training and awareness-raising	■ □ □
Participation	Member States reporting	■ □ □
	Policy dialogue	■ ■ □
	NDICI – Global Europe	■ ■ □
Monitoring and reporting	EU Reports on PCD	■ □ □
Legend: Off track ■ □ □ At risk ■ ■ □ On track ■ ■ ■ Not available □ □ □		

Source: Author's own compilation.

5 Case studies in specific PCD areas

5.1 Mozambique: trade and climate

The area of trade has been a traditional focus of PCD activities since enactment of the policy. This in-depth analysis does not have sufficient capacity to tackle the complex relations between trade, climate and poverty, thus focuses only on some limited aspects. Mozambique is an interesting case since it was used to exemplify the Generalised System of Preferences in the 2018 external evaluation of the EU's PCD, yet its trade relations with the EU now form part of the Economic Partnership Agreement between the EU and the Southern African Development Community. Moreover, with its increasing gas production – the first cargo of Liquefied Natural Gas was due to be shipped in August 2022¹⁹¹ – and the highly carbon-intensive production of aluminium exported to the EU, it is expected that Mozambique will register significant negative impacts regarding the EU's climate policy.

In the area of trade, Mozambique faces key problems with regard to the low levels of industrialisation and diversification of the economy and the government's limited capacity to make use of market access provided by the Economic Partnership Agreement. According to the EUD, for the Ministry of Industry and Commerce of Mozambique, the facilitated importation of industrial products and machinery in particular to the country is not a major issue, given that it is seen as supporting local production¹⁹². However, the Ministry and Customs Authority still encounter problems with issuing certificates of origin and fully using access to the EU market. In this case, PCD is supported mainly by the EU's cooperation programmes. Through the programme PROMOVE Comércio with a total budget of EUR 12 million, partly implemented by the United Nations Industrial Development Organization, the EU seeks to build the capacities of governmental bodies and small- and medium-sized enterprises to create value chains and boost exports to the EU. At the same time, as a part of the European Economic Diplomacy, EU activities in Mozambique

¹⁹¹ M. Hill and S. Chapa, '[Mozambique to Export First LNG as Global Natural-Gas Prices Soar](#)', Bloomberg, 18 August 2022.

¹⁹² EU Delegation, Interview with diplomat, 6 September 2022.

also in part motivated by self-interest through the financing of the Association of European Chambers of Commerce¹⁹³.

Unlike the deforestation regulation case below, the EU's trade policy does not directly create negative externalities by blocking access to the EU's market as a consequence of a policy change in the EU. In this case, the full potential of the EU's trade policy to support Mozambique's social and economic development is undermined by the weak abilities of local actors to implement development cooperation and build experience in using market opportunities created by a change in the EU's policy. Recently, though, the EUD in Maputo found itself in a more complex situation when trade policy became *de facto* altered by the EU's climate policy.

To some extent, the EU found itself regarded as an incoherent actor, when it globally signalled the end of support for natural gas projects as a climate mitigation measure (though the EU never supported natural gas exploitation in this country). At the same time, the operating businesses in the carbon-intensive gas sector are mostly European investments. Following Russian aggression in Ukraine, the situation has now changed with the EU once again seeking more gas from Mozambique in the short-term. Moreover, the EC's announcement of the Carbon Border Adjustment Mechanism initiative (CBAM) as a 'climate tax' on selected, carbon-intensive imports to the EU raised legitimate concerns for the Mozambican government. Indeed, the introduction of CBAM could particularly affect Mozambique's revenues, depending on the modalities of the policy. The EC's impact assessment emphasises that Mozambican exports of aluminium to the EU account for 7 % of the country's gross domestic product, which in turn amounts to almost EUR 1 billion per year¹⁹⁴. Yet, the IA does not go any further in calculating the expected loss of tax revenues from the aluminium sector, based on average prices of the EU's Emissions Trading System that will serve as a base for CBAM 'tax'.

The EC's proposal for introducing CBAM does not see exemptions for LDCs as an option, but at least it admits the possibility for 'a gradual phasing in of the CBAM' but only 'for existing production capacities in LDCs'¹⁹⁵. As in most EC's assessments, 'technical assistance, technology transfer, extensive capacity building and financial support' are seen as a solution¹⁹⁶. The proposal also recognises, though, that LDCs are the least equipped to adjust to the introduction of this tax, as the case of a long-term and delayed implementation of the EU- Southern African Development Community EPA shows. The EU's plans to decarbonise maritime transport would probably have further impacts on the country.

The case of Mozambique shows that while supporting efforts of the country to boost its exportations, the EU can lack some clarity when it comes to policy initiatives that make part of the EGD. As in the case of deforestation regulation, the EP has also been shown to be more sensitive to the needs of LDCs. Its initial appraisal noted that contrast between the recognition of serious negative impacts and the missing details on their mitigation¹⁹⁷. In the subsequent legislative process, the EP called for due attention to LDCs and other developing countries in its proposal¹⁹⁸.

¹⁹³ EU Delegation, Interview with diplomat, 6 September 2022.

¹⁹⁴ European Commission, [Proposal for a Regulation of the European parliament and of the Council establishing a carbon border adjustment mechanism](#), COM(2021) 564 final, 17 July 2021, p. 21.

¹⁹⁵ European Commission, [Proposal for a Regulation of the European parliament and of the Council establishing a carbon border adjustment mechanism](#), COM(2021) 564 final, 17 July 2021, p. 30.

¹⁹⁶ Ibid.

¹⁹⁷ E. Kramer, '[Fit for 55' package: Carbon border adjustment mechanism](#), Ex-Ante Impact Assessment Unit, European Parliamentary Research Service, PE.699.473, January 2022, p. 7.

¹⁹⁸ European Parliament, [2021/0214\(COD\), Carbon Border Adjustment Mechanism](#), n.d.

5.2 Guatemala: deforestation regulation

The EU's renewed efforts to limit deforestation form an interesting case of a policy initiative that is part of the EGD. Historically, PCD as a policy did not contribute to limiting deforestation, even though PCD-specific analysis was produced¹⁹⁹. It is currently estimated that the 2009 Renewable Energy Directive has led to the overall deforestation of 40 000 km² and considerably more greenhouse gas emissions than would have resulted from the burning of fossil fuels, instead of importing additives to biofuels grown on deforested areas. In spite of this, the EU imported a record-high 4.7 megaton of palm oil in 2020²⁰⁰.

In November 2021, the EC came up with a proposal for the so-called deforestation regulation as contributing to the EGD²⁰¹. The proposal shows that the PCD system is currently unable to acknowledge social costs fully and hence the impacts on poverty²⁰². The goal to cut worldwide deforestation, caused by an initial choice of six products from the EU's agricultural imports, by an estimated 719 km² annually by 2030 is fully legitimate since the EU's importations are estimated to contribute to 10 % of global forest loss induced by associated the production of goods or services²⁰³. Still, this number needs to be put in perspective with more than 100 000 km² of forests that humans destroy each year worldwide for all possible reasons²⁰⁴.

As a part of the EGD agenda, the deforestation regulation IA elaborates on environmental aspects, but not sufficiently in terms of the social costs for producers. The Commission's own 87-page IA mentions new jobs in risk-free production but more importantly lost jobs in non-compliant production and it does not further elaborate on the final balance²⁰⁵. Yet, published meta studies warn that certification schemes generally lead to higher prices and lower wages for farmers, women and men in low-income countries, with unclear effects on total household income²⁰⁶.

The EC acknowledged short-term negative impacts on smallholders, particularly their food, health and education, yet these would be limited by the 2020 cut-off date and by 'other measures' recommended in the related 2019 communication and its annexes, none of which addresses the social costs of transition²⁰⁷.

The IA includes a sub-chapter entitled Coherence with other EU policy objectives²⁰⁸. However, no reference is made to the treaty-based PCD, PCSD or economic outcomes in low- and middle-income countries. In

¹⁹⁹ European Commission, [The EU – a global partner for development – Speeding up progress towards the Millennium Development Goals – Policy coherence for development climate change/energy/biofuels, migration and research](#), Staff Working Paper, COM(2008) 177 Final, 9 April 2008.

²⁰⁰ S. Rangaraju, '10 Years of EU Fuels Policy Increased EU's Reliance on Unsustainable Biofuels', Briefing, *Transport and Environment*, July 2021.

²⁰¹ European Commission, [Proposal for a Regulation on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation](#), Commission Staff Working Paper, **COM(2021) 706 final**, 117 November 2021.

²⁰² This subchapter is a shortened, modified and updated case study published in O. Horký-Hlucháň, 'Is the EU Fit for the Green Deal? Lessons from Policy Coherence for Sustainable Development', *TEPSA Brief*, December 2021.

²⁰³ European Commission, [Proposal for a Regulation on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation](#), Commission Staff Working Paper, **COM(2021) 706 final**, 117 November 2021, pp. 60 and 24.

²⁰⁴ Food and Agriculture Organization of the United Nations, [Global Forest Resources Assessment 2020: Main Report](#), 2022, p. 37.

²⁰⁵ European Commission, [Impact Assessment minimising the risk of deforestation and forest degradation associated with products placed on the EU market](#), Staff Working Document, SWD(2021) 326 Final, 17 November 2021, p. 62.

²⁰⁶ C. Oya et al., 'Effects of Certification Schemes for Agricultural Production on Socio-economic Outcomes in Low- and Middle-income Countries: A Systematic Review', *Campbell Systematic Reviews*, Vol 13, No 1, 2017, p. 9.

²⁰⁷ European Commission, 'Stepping up EU Action to Protect and Restore the World's Forests', Communication, COM(2019) 352 Final, 23 July 2019.

²⁰⁸ European Commission, [Impact Assessment minimising the risk of deforestation and forest degradation associated with products placed on the EU market](#), Staff Working Document, SWD(2021) 326 Final, 17 November 2021, p. 64.

retrospective, the IA's insufficient consideration of social impacts was also acknowledged by DG INTPA²⁰⁹. The deforestation regulation proposal suggests that the processes at DG INTPA and the EC as a whole did *not* manage to alter the original proposal of DG ENV to take into account development objectives.

This shortcoming was partly mitigated by the EP, following *inter alia* the opinion of DEVE that is fully reflected in the amendments to the regulation voted by the plenum²¹⁰. Most importantly in relation to the social and economic impacts of the regulation, DEVE amended its proposal to tackle the problems of smallholders and their preparedness for the regulation's entry in force as well as the EU's preparedness in providing technical assistance to meet the regulation's requirement beforehand.

This need was confirmed in the case of Guatemala. Unlike palm oil which is produced by larger companies, Guatemalan coffee is grown by a large number of smallholders and purchased by cooperatives. Consequently, a timely preparation and presentation of certificates of origin that would point to the specific geo-locations of farms present a serious challenge²¹¹. Thanks to the joint efforts of the EUDs in Guatemala and Costa Rica (where the trade section for Central America is based) three experts were commissioned through the Trade and Private Sector Development Facility to carry out an analysis of value chains. This initiative strives to include mitigating actions in its forthcoming cooperation programme (delegated to Germany and Spain) as quickly as the administrative process allows. For example, use of the EU's Earth observation programme Copernicus is being considered for geolocating the farmers' plots.

Yet there is a concern at the EUD that the mitigation of negative social impacts by technical assistance will be insufficient and the regulation's entry into force in mid-2023 could halt coffee exports to the European market, thereby threatening the livelihoods of these Guatemalan farmers. An explicit PCD-justified proposal for a transition period on these sensitive products, though, made only part of the EP's amendments with a July draft consensus, despite pressure from some environmental CSOs not to delay the regulation's entry in force.

This case study highlighted the point that EUDs' capacities to analyse PCD impacts and include mitigation in cooperation programming are in place, as well as the partial capacity of the EP, and DEVE in particular, to amend the Commission's proposal from an explicit PCD perspective. The EC, and DG INTPA in particular, did not apply a PCD perspective in their IA and the regulation proposal but at least the EC continually informed the Delegations about the initiative via communication packages, probably prepared by DG ENV. This allowed the Delegation to analyse the effects and come up with proposals to mitigate the impact of the regulation²¹².

Based on this case, it can be expected that the social impacts of environmentally-focused initiatives on developing countries may be further underestimated or ignored in other EGD-related proposals by DG ENV and the Directorate-General for Climate Action, for example. This will be so, unless existing PCD mechanisms, especially impact assessments and interservice consultations, are used to prevent negative social impacts and the rise in poverty. In this case the identification of problems came relatively early because the EU's cooperation was already active in the field of small-scale agriculture, but other EGD-related initiatives may affect policy areas where information and analysis are less available.

²⁰⁹ European Commission, Interview with officer, 20 July 2022.

²¹⁰ European Parliament, [Opinion of the Committee on Development for the for the Committee on the Environment, Public Health and Food Safety on the proposal for a regulation of the European Parliament and of the Council on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation \(EU\) No 995/2010 \(COM\(2021\)0706 – C9-0430/2021 – 2021/0366\(COD\)\)](#), 22 June 2022.

²¹¹ EU Delegation, Interview with diplomat, 12 September 2022.

²¹² EU Delegation, Interview with diplomat, 12 September 2022.

6 Contribution to global sustainable development

6.1 UN's approach to policy coherence

The importance of PCD for the UN can be illustrated by the position it was given in the SDGs. As already explained in relation to the transition towards the umbrella sustainable development agenda, the place for PCD is very limited as a subset of PCSD, which is but one of 169 SDTs, and hence PCD does seldom appear in the dialogue between the UN and the EU²¹³. The EU's voluntary review at the 2023 HLPF will be an exception to this. The lack of a more substantial multi-lateral framework for policy coherence means that there are few opportunities to put it on the day-to-day agenda between the EU and UN. By contrast, for example, the annual rhythm of the Conference of Parties in the climate agenda puts climate permanently on the EU-UN policy dialogue.

More generally, the EU is mainly perceived as a valued direct contributor to the implementation of SDGs and the main emphasis is placed by the UN on the commitment needed to meet the goals since it is now the half-time of the 2030 Agenda since its enactment in 2015. The UN's focus is hence less so on the internal framework of the EU to implement the SDGs than on its actions, though the internal reorganisation of certain DGs around the main pillars of the 2030 Agenda is appreciated as well as the cross-cutting commitment to the implementations of the SDGs in the mission letters to Commissioners by their President²¹⁴.

The dialogue between the EU and the UN also seems to be rather depoliticised. Since the EU heavily contributed to the formulation of the SDGs, there is no mismatch between the alignment of both organisations and different views may occur about the way to reach the goals rather than the goals themselves. The UN recognises the EU's need for visibility which is a long-standing limitation for joint actions encountered with all donors, at regional and national levels alike. Potentially problematic limitations to resolving incoherences due to the EU's reluctance to strengthen the role of the UN in areas such as taxation and social corporate responsibility are not on the agenda.

The largest potential for cooperation between the UN and the EU, and also with the World Bank, is situated at country level in the global South, in the agendas of development cooperation, humanitarian aid and climate action through the assistance for developing countries in implementing their Nationally Determined Contribution plans. This highlights the role of the EU-UN cooperation in coordinating development aid as a major tool to tackle the outcomes of policy incoherences created at the European and global levels.

6.2 OECD's approach to policy coherence

In contrast to the EU, the OECD endured a longer 'period of some confusion' and it took its members about two years to find consensus on their positions in the 2019 update of the 2010 recommendation on policy coherence for (sustainable) development²¹⁵. This delay was also due to some EU Members fearing that, despite their progress made on PCD at a national level in the past, PCD would practically disappear from the OECD's focus, given that the draft recommendation suggested an exclusive focus on PCSD. The EC was

²¹³ UN, Interview with two officers, 20 September 2022.

²¹⁴ UN, Interview with two officers, 20 September 2022.

²¹⁵ OECD, Interview with officer, 21 July 2022; OECD, ['Recommendation of the Council on Good Institutional Practices in Promoting Policy Coherence'](#), 2010 Version, OECD Legal Instruments, OECD/LEGAL/038, 2010; OECD, ['Recommendation of the Council on Policy Coherence for Sustainable Development'](#), OECD Legal Instruments, OECD/LEGAL/0381, 2019.

certainly very vocal when raising the issue in its 2019 report: ‘for some EU Member States, PCD has been partially or totally subsumed by PCSD’²¹⁶. Nowadays, PCD is seen by the OECD as an integral part of PCSD.

More generally, the OECD sees PCSD as a governance issue to be dealt with by member governments in a relatively depoliticised way. In contrast, the EU has a special norm-setting role in the sustainable development agenda *vis-à-vis* Member States and it seems more reluctant to submit itself to principles set by an intergovernmental organisation, even though the majority of its members are Member States. This shift towards policy coherence as a governance issue is ongoing but it ‘did not trickle down to policies yet’²¹⁷. However, this trajectory is well documented by the institutional journey of the PC(S)D unit from the Development Co-operation Directorate through the General Secretariat to the current Directorate for Public Governance.

The OECD organises a formalised, bi-annual meeting on the focal points of policy coherence (formerly on policy coherence for development). Due to the PCD agenda’s ‘survival’, it is not uncommon for a member state to be represented by two (or even more) focal points on the internal and transboundary dimensions of PCSD²¹⁸. As an officer put it, ‘we don’t talk the same language’ yet²¹⁹. In this sense, the OECD’s meetings aim to break the silos, the mantra of the UN 2030 Agenda. For this type of work, the OECD has a privileged position, since unlike the EC it is not a legislative or executive body.

Due to its aforementioned reluctance regarding the PCSD agenda, the Commission’s SEC GEN has only recently joined DG INTPA as an additional focal point on behalf of the EU at the regular policy coherence meetings. The EU is also undergoing a mid-term peer review being undertaken by the OECD’s Development Assistance Committee. In line with the findings in Section 3, the 2018 regular peer review carried out by OECD criticised the biannual reporting by the EU Member States as being insufficient and its quality as ‘uneven’. More generally, the EU ‘need[ed] to focus on impact’. Both 2012 recommendations on PCD were deemed to have been only ‘partially implemented’²²⁰. These were: (i) to ‘give PCD sufficient weight in EU decision making’ by the Council of the EU and ‘forge political will and reinforce existing mechanisms’; as well as (ii) ‘strengthen knowledge management’, set up a ‘strategy on development research which would include producing evidence and ‘improve awareness and training for officials’.

To date, the OECD’s PCSD Unit is much more engaged with Member States than the EC. In the policy coherence agenda generally, though, the EU plays a crucial role, accentuated by the hiatus in USA involvement during the Trump administration and the broader reduction in the United Kingdom’s development policy following Brexit²²¹.

The OECD has also partnered with the African Peer Review mechanism, an African initiative for improving African governance that has become a part of the African Union, to support governance reforms towards PCSD. Though the EU’s experience is not always transferable from regional to national levels, and Asian and North-American regional integrations are not advanced enough yet, this could provide inspiration for the EU to transfer its PCD experience to emerging powers, whose influence is starting to be felt by developing countries, albeit not always without contradictions²²².

²¹⁶ European Commission, [2019 EU Report on Policy Coherence for Development](#), Staff Working Document, SWD(2019) 20 Final, 2019, p. 55.

²¹⁷ OECD, Interview with officer, 21 July 2022.

²¹⁸ OECD, Interview with officer, 21 July 2022.

²¹⁹ European Commission, Interview with officer, 20 July 2022.

²²⁰ OECD, [OECD Development Co-Operation Peer Reviews: European Union 2018](#), Development Assistance Committee, 10 December 2018.

²²¹ OECD, Interview with officer, 21 July 2022.

²²² OECD, Interview with officer, 21 July 2022.

6.3 EU in the global division of labour on PCSD

The EU likes to present itself as a 'leader in promoting PCD'²²³. Yet in spite of the OECD's shift towards PCSD, EU Member States seem to have more interaction on PCD with the OECD. While EU and OECD roles are radically different, they are at least complementary. However, the double-track relations of Member States with both organisations where states report to the EU while being submitted to OECD peer reviews does not make sense without closer cooperation from the EU and OECD on the issues of policy coherence in general terms.

Unlike for the OECD, policy coherence as a concept is not high on the UN's agenda, which is due to the focus on the very implementation of the 2030 Agenda, mostly through development cooperation, rather than the governance framework to implement it. This shifts the opportunities for further cooperation to the country level in the global South where synergies in development programming and finance may be strengthened between the EU, the UN and the World Bank to tackle both negative and positive transboundary externalities caused by the policies of the EU and other countries and regional blocks, including the emerging powers.

Yet, the goal of PCD implementation consists ultimately in policy change, which may often be hindered by the global political and economic structures. Developing countries that are affected by the policies of the developed countries may find the most legitimate and equal fora for discussing policy coherence at UN rather than EU level. The OECD also represents the interests of most developed countries in the global North and South. A conversation on PCD (and PCSD) between the UN, the OECD, the EU and their member states is therefore needed to resolve the structural obstacles to greater policy coherence and concrete policy change.

7 Conclusions and recommendations

The EU legal obligation to take account of development policy objectives alongside its other policies has formed part of EU treaties for the past thirty years or so. Over time, mechanisms to promote the related PCD concept have been developed, yet the political commitment and capacities to implement PCD across all policies systematically have lagged behind the available technical tools and administrative mechanisms. This has restricted policy deliberation between diverse and equally legitimate values and interests, thereby resulting in limited PCD implementation.

More recently, the UN 2030 Agenda, the SDGs and the EGD rekindled a political commitment to policy integration ('breaking the silos'), sustainable development and the external dimension of EU policies. This has had a positive effect on *implicit* PCD implementation by including sustainability issues in traditional policies with external impacts such as trade.

However, during the transition period from a traditional international development framework to a global sustainable development framework, the *explicit* implementation of PCD as a policy was seen to decline especially within the EC and the Council of the EU. Among these actors, this in-depth analysis did not register any sustained improvements to PCD since an external evaluation commissioned by the EC. This extensive evaluation published in 2018 acknowledged the EU's leading role in promoting PCD globally but it failed to find evidence of PCD having 'trickled down' to the selected EU policies that affect partner countries.

Some progress was registered with the introduction of BR by the SEC GEN. Recently, BR has become more binding in the area of SDGs mainstreaming than PCD mainstreaming but as yet it is too early for its

²²³ European Commission, [2019 EU Report on Policy Coherence for Development](#), Staff Working Document, SWD(2019) 20 Final, 2019, p. 55.

evaluation due to the current lack of completed assessments. The EEAS has mostly focused on adapting development cooperation to situations created by the EU's policy impacts. However, any explicit involvement of EUDs in PCD implementation did not extend beyond limited annual training and reporting. There was no follow-up planning process.

The EP and its DEVE Committee on Development have been more active by introducing PCD perspectives into the relevant initiatives, yet even this development has been unable to prevent the EC's failure to apply PCD to all relevant impact assessments and the related interservice consultations systematically. The dispersion of the PCD focus on more general procedures within DG INTPA coupled with the unavailability of formal documents recording PCD processes do not allow for a full and fair assessment of processes within the DG and EUDs. The Commission's public reporting is mostly descriptive and it is impossible to quantify the effectiveness of PCD against internal objectives due to the absence of clear targets and transparent monitoring.

Case studies on trade, climate and deforestation suggest that despite increased mainstreaming of sustainable development issues into EU external action, any strong political will for implementation of the EGD, which is mainly motivated by environmental and climate concerns, poses risks in light of economic and social impacts, particularly for people in the lower strata of society living in poorer partner countries. At times, PCD coordination between the EU's Headquarters and its Delegations may also be insufficient to create synergies and mobilise development cooperation, not only in building capacities but also in making good use of any opportunities created by EU policies, especially in countries with limited government capacity.

This in-depth analysis considered gaps between a state-of-the-art comprehensive model of PCD, adapted from the OECD model of eight building blocks for PCSD, and the dynamics within and between different European institutions and their stakeholders. 10 principal, interrelated recommendations from this in-depth analysis to various institutional actors can be summarised as follows:

European institutions

- **Contribute, with renewed political commitment to PCD, to a new EU Sustainable Development strategy.** The form of the EU's commitment may be a joint statement on PCD by the EC, the EEAS, the EP and the Council or a standard Communication by the EC with a follow-up by other institutions but it should be seen as a step towards the missing EU Sustainable Development Strategy that the EP and the Council of the EU have been calling for since 2019.
- **Institutionalise the EU's commitment to a transparent, impactful and participative PCD,** following the BR main principles, throughout the European institutions and after thorough political deliberation among them and with other stakeholders.
- **Commit to mitigating and not only considering policy impacts** by strictly applying the 'do no harm' principle to the world's poor and most vulnerable in the spirit of 'leaving no one behind' in the process of global transformation towards more sustainability.

European Commission, SEC GEN

- **Explicitly add policy coherence to the mission of the Interservice Group on the Sustainable Development Goals** as a regular coordination body between different EC's directorates and keep the frequency of its meetings beyond the EU's voluntary review at the 2023 UN HLPF.
- **Revive the multi-stakeholder platform on sustainable development** that existed under the previous Commission and make policy coherence an important aspect of the discussions.

- **Create complementarity and coordination with the OECD** and strengthen mutual cooperation with the goal of mobilising Member States for clarifying and implementing PCD and PCSD agendas.
- **Make the impact on developing countries a compulsory response in the impact assessment form** and in ex-post evaluations to reflect the character of PCD as a treaty obligation.
- **Initiate a triologue with the OECD and the UN** on PCD and PCSD as a starting point for reforming the capacity of the institutions participating on global governance to tackle policy incoherencies with the objectives of global sustainable development.

European Commission, DG INTPA

- **Restore the PCD team and centralise PCD coordination** at DG INTPA through the whole policy cycle.
- **Assign sufficient capacities for the PCD team** to be able become a centre for policy coordination and to perform training and awareness raising, including public awareness and the organisation of events such as the European Development Days.
- **Set up a transparent system of planning, monitoring and reporting PCD at DG INTPA**, directly involving the EUDs.
- **Track and identify PCD-relevant initiatives** in a systematic and transparent manner by separating it from other legitimated concerns.
- **Monitor involvement in IAs, ISC, ex-post evaluations and other intra- and inter-institutional mechanisms** from an explicit PCD perspective to prevent negative effects and strengthen potential synergies of policy changes planned by the EU.
- **Summarise progress on PCD in INTPA activity reports** on an annual basis, in addition to renewed bi-annual PCD reporting by the EC, based on the reporting by EUDs.

European External Action Service

- **Strengthen PCD in policy dialogue with partner countries at EUDs and increase participation** of both governmental and non-governmental stakeholders to improve the expected assessment of the EU's policies.
- **Include capacity building in joint programming** when capacities of the stakeholders to assess impacts in the relevant issue areas are not available at the partner country level.
- **Encourage greater policy coherence between different government actors in partner countries** by giving incentives for working together on cross-cutting issues in projects.
- **Breakout PCD question in Progress Report** according to procedure and outcome; provide guidance for filling the questions.
- **Make use of the PCD processes and outcomes to improve the perception of the EU in partner countries** via public diplomacy, strengthen the trust of the citizens of the partner countries towards the Union and ultimately deepen partnerships with their governments for promoting collective action on global sustainable development in a changing geopolitical context.

European Parliament, DEVE Committee

- **Contribute to the clarification of PCD** with the AFCO Committee in a joint report on Article 208 TFEU.
- **Strengthen oversight with the PCD rapporteur** over the scrutinised initiatives assigned to the other committees and feed in information from inter-parliamentary bodies and other stakeholders.

- **Identify new incoherences in the EU's external action** and contribute to their deliberation and resolution to go beyond just keeping up with the impacts of EU policies.
- **Ask EPRS to explicitly appraise the inclusion of developing countries** in the Commission's IA.
- **Initiate processes leading the EC and EPRS to improve or do supplementary assessments** on an ad hoc basis when IAs fail to consider the impacts on developing countries on major initiatives.

Council of the EU, Directorate-General for the External Relations

- **Put PCD explicitly and regularly on the agenda of the corresponding Working Party CODEV-PI** explicitly and regularly
- **Organise joint meetings with other working parties** on topical issues and with the Working Party on the 2030 Agenda for Sustainable Development particularly.

Member States

- **Renew involvement on PCD in the Council of the EU** at Working Party and informal ministerial meeting levels, especially by using the rotating Presidency to set PCD on the agenda as a whole and not merely a topical aspect.
- **Become involved on PCD at meetings of Heads of Mission and Heads of Cooperation** in partner countries.
- **Direct bilateral development cooperation to sectors affected by the EU's policies**, where funding from NDICI – Global Europe may be insufficient.

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II. Workshop proceedings

WORKSHOP PROCEEDINGS

Enhancing
policy coherence for development

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WORKSHOP

POLICY DEPARTMENT, DG EXPO
FOR THE COMMITTEE ON DEVELOPMENT
(DEVE)



Thursday, 29 September 2022 – **14:00-16:15**
SPAAK BUILDING, ROOM **7C050/ VIA WEBSTREAMING**

CONTACT AND REGISTRATION: poldep-expo@ep.europa.eu

Enhancing policy coherence for development



Chaired by Janina OCHOJSKA

1 Workshop programme

WORKSHOP: ENHANCING POLICY COHERENCE FOR DEVELOPMENT

Thursday, 29 September 2022, 14:00 - 16:15
Interpretation: PL, EN, FR
Brussels SPAAK building, room 7C050 / webstreaming

DRAFT PROGRAMME

- 14:00-14:05 **Introductory remarks**
Welcome by **MEP Janina Ochojska**, MEP, Committee on Development (DEVE)
- 14:05-15:05 **Panel 1: Policy and legal approaches to PCD implementation**
- **Norbert Probst**, Senior Desk Officer, DG INTPA, European Commission
 - **Dan Dionisie**, Head of Unit for economic analysis and evaluation, DG JUST, European Commission
 - **Santhosh Persaud**, Policy Analyst, OECD Development Cooperation Directorate
 - **Astra Bonini**, Senior Sustainable Development Officer, UN Department of Economic and Social Affairs
- Q&A
- **Bjorn Kuil**, Policy Officer, European External Action Service
- 15:05-16:10 **Panel 2: Challenges and gaps in PCD implementation**
- **Dr Ondřej Horký-Hlucháň**, Senior Researcher, Institute of International Relations Prague
 - **Elisabeth Diaz Hochmann**, Senior Programme Officer, UN Development Coordination Office in Brussels
 - **Lisanne van der Steeg**, Member of the Policy Coherence for Sustainable Development working group, CONCORD
- Q&A
- 16:10-16:15 **Concluding remarks**
MEP Janina Ochojska, MEP, Committee on Development (DEVE)

2 Introduction

The workshop titled ‘Enhancing policy coherence for development’ was organised by the Policy Department of the European Parliament (EP) Directorate-General for External Policies. It took place in hybrid format on 29 September 2022 under the chairmanship of MEP Janina Ochojska (Group of the European People’s Party). The aim of the workshop was to explore the latest developments in the application of policy coherence for development (PCD). Therefore, various experts and practitioners were invited to present their work and to engage in a discussion with Members of the EP (MEPs), including representatives from international organisations such as the OECD and the UN as well as NGOs, experts in the subject matter, and representatives from civil society and policy researchers.

Opening remarks were given by MEP Ochojska, who underlined that PCD is a core pillar of the EU’s efforts to increase the effectiveness of development cooperation, as a legal and political commitment for the EU institutions and the member states. She stressed therefore that the way in which PCD is understood and put into practice is of utmost importance.

3 Panel 1: Policy and legal approaches to PCD implementation

Panel 1 included four speakers: Mr Norbert Probst, Senior Desk Officer at DG INTPA (European Commission), Mr Dan Dionisie, Head of Unit for economic analysis and evaluation, DG JUST (European Commission), Mr Santhosh Persaud, Policy Analyst at the OECD Development Cooperation Directorate and Ms Astra Bonini, Senior Sustainable Development Officer at the UN Department of Economic and Social Affairs.

3.1 Presentation by academic expert and stakeholders’ contributions

Mr Norbert Probst started the first panel by highlighting the legal foundation of PCD, namely Article 208 of the Treaty on the Functioning of the European Union (TFEU). The commitment to consider external impacts on our partner countries when implementing domestic policy, which is enshrined in said Article, is commonly known as policy coherence for development (PCD). The fact that this principle is included in EU fundamental law makes the EU a PCD frontrunner on the international stage. Since 2005, the EU has developed a number of tools and mechanisms on PCD. The most recent development is strongly related to and triggered by the adoption of the UN 2030 Agenda for Sustainable Development in 2015, where the international community set a new global framework for action regarding poverty eradication and sustainable development. The EU and its member states are determined to implement the 2030 Agenda and its Sustainable Development Goals (SDGs).

Mr Probst further underlined that the interlinkages between the SDGs underscore the need to break down silos and seek greater coherence between policies so that they become mutually supportive. This means that the PCD concept remains relevant, since it requires us to maintain focus on the impact on developing countries. However, the EU’s approach to PCD had to be adapted to the requirements of the new global policy framework.

The response to that challenge was provided by the new European Consensus on Development in June 2017, which underscored the importance of PCD and recognised it as a crucial element of the EU strategy to achieve the SDGs in partner countries and hence as an important contribution to the broader objective of sustainable development. PCD is therefore now determined by the need to deliver on the 2030 Agenda.

Against this background, Mr Probst pointed out the actions the European Commission has taken to adapt PCD to SDG implementation. Firstly, the scope of PCD was broadened beyond the traditional five strategic challenges that existed before (i.e. trade and finance, climate change, food security, migration and security)

to reflect the new dynamics of the SDGs and the requirements of the European Consensus on Development. In operational terms, this means that PCD has been fully integrated in the overall Commission work related to SDG implementation.

Secondly, PCD reporting is no longer a stand-alone exercise but part of a comprehensive EU reporting on the SDGs. The latest PCD report of January 2019 was already closely linked to the Commission's reflection paper of that time, entitled "Towards a Sustainable Europe by 2030", which itself was part of the reporting on the SDGs for the UN High Level Political Forum on Sustainable Development in New York. The European Parliament and the European Council welcomed the adoption of the 2019 PCD Report and the attempt to better integrate it in the comprehensive EU reporting on the implementation of the 2030 Agenda. Mr Probst explained that for the 2023 reporting to the UN High Level Political Forum, it is the intention of the European Commission to go even further and to fully integrate the EU PCD reporting on impacts of EU policies on developing countries in relation to the different SDGs into the first ever EU Voluntary Review.

Thirdly, Mr Probst pointed out that an important additional action in this context is the review of the Better Regulation Agenda. He explained that it is a long-standing position of the Commission that its Better Regulation framework is a highly effective tool to comply with Article 208 and to promote PCD, in particular (but not exclusively) through its guidance on the impact assessment process. References to assessing impacts on developing countries have been continuously reinforced since 2009. However, in Mr Probst's opinion, the latest reviews of the Better Regulation framework of April and November 2021 represent the biggest qualitative leap forward for PCD within the Better Regulation framework.

In this context, Mr Probst listed a number of important features: for the first time there is an actual political document and not just guidelines, in which the Commission undertakes to better consider the external implications of internal policies and their significant impacts on third countries. In addition, impact assessment tool number 35 for developing countries been amended to include an additional chapter on the SDGs and a strong emphasis on local stakeholder consultation. In addition to tool number 35, Mr Probst referenced other PCD-relevant tools, notably overarching tool number 18 on the identification of impacts, which contains a list of potential impacts and references to interlinkages between different SDGs as well as a clear commitment to policy coherence for development. Thus, it entails a very clear reflection of the new integrated approach to assessing impacts in the European Commission.

Mr Probst concluded by explaining he feels there is a growing consideration for the external dimension in EU legislation. This is precisely fostered through the implementation of the SDGs which provide an explicit bridge between EU internal and external actions. He added that this development is also reinforced by the fact that the European Commission has adopted in recent years a number of measures with implications for the relations with partner countries, under the European Green Deal, the Digital Agenda or other European priorities. Consequently, he pointed out that the external relations DGs of the Commission have designed a working tool - the Commission Work Program Tracker - through which the external relations DGs analyse the areas of highest impact of the internal policy proposals from their conception. This allows also for the engagement of impacted EU delegations and feedback from the ground.

Mr Dan Dionisie started by stating he was speaking from the perspective of a policy DG that has to take into account policy coherence for development when developing policies in its areas of competence. For that purpose, the European Commission developed and now uses the Better Regulation framework.

Mr Dionisie tackled five main points regarding the Better Regulation framework.

1. Policy coherence for development is a multi-layered, very elaborate system that addresses issues across different levels. It is founded in the Treaty, and reflected in the political document of the Better Regulation Communication, which was adopted in spring last year. In addition, the Better Regulation instruments include mandatory guidelines; these prescribe a few types of impacts to be obligatorily

assessed in any impact assessment, including the impacts on the relevant sustainable development goals. In addition to the guidelines, there is an extensive Better Regulation toolkit with a number of tools that detail how this analysis should be carried out. Mr Dionisie made reference to tool 35, used to assess the impact on developing countries (formerly tool 34), which emphasises the need for consulting the developing countries' stakeholders, puts forward the instruments available in terms of modelling, indicators and data resources and in general provides guidance on how to carry out this analysis. Moreover, the overarching tool 18 on the identification of impacts maps every impact area in terms of linkages with the relevant sustainable development goals. It also lists the key questions to be asked in every impact area with regard to the impact on the SDGs. Furthermore, Mr Dionisie pointed to other relevant tools, such as tool 19, which is dedicated to the SDGs, and tool 27 dealing with impacts in terms of external trade and investments, which also has extensive references to the impact on developing countries as well as references to the impact on developing countries in a number of other tools (he gave as an example tool 30 on employment and working conditions, income distribution, social protection and inclusion and tool 31 on education and training, culture and youth).

2. Mr Dionisie stressed that the recent update of the Better Regulation framework (finalised in November 2021 and in effect since January 2022) puts a very significant emphasis on the SDGs. Tool 19, dedicated to the SDGs, is new and did not appear in the previous version of the Better Regulation framework. Tool 18 is an overarching tool that, as mentioned previously, maps the SDGs that are relevant and identifies the key questions to be asked for each impact area. Very importantly, every tool also contains a list of the relevant SDGs with the relevant indicators to look at, which is also a guarantee that when applying these tools the policy officers in charge of developing impact assessment and policy proposals will have to look at these issues and consider the impact on developing countries and the SDGs.
3. Mr Dionisie went on to explain that because the new version of the better regulation toolbox and guidelines has entered in full application as of the beginning of this year, the impact will be seen increasingly in the coming period, considering also the cycle of the impact assessment for the Commission proposals. Some of the ongoing impact assessments have had to adapt to these new guidelines and the new tools during their implementation while other impact assessments, which will start in the current period, will use the new guidelines and tools from the very beginning. Mr Dionisie expected that in particular the impact on the SDGs would be increasingly present in the upcoming impact assessments and Commission policy proposals.
4. Mr Dionisie pointed out that the Better Regulation tools only cover the policy cycle until the adoption of the proposals by the Commission, and then these go through the wider legislative process where other instruments are at work that should also ensure policy coherence for development further in the legislative process.
5. Mr Dionisie concluded by suggesting to consider the indirect impact of EU policy proposals on developing countries. He pointed to the so-called 'Brussels effect', which refers to the influence that EU legislation indirectly has on other countries -as the EU is a global superpower in regulatory terms and its policies tend to set certain standards globally. This suggests that PCD is relevant to consider for an even broader range of policies.

Mr Santhosh Persaud structured his intervention around four aspects:

- the OECD standard in the field of policy coherence
- an overview of OECD work in this area
- good practices that OECD has identified

- a few reflections on the EU and particularities in the field of policy coherence

Mr Persaud explained that the OECD is one of the leading institutions in the field of policy coherence. After more than 20 years of work, in 2019, the OECD members adopted a specific recommendation on policy coherence for sustainable development (PCSD), which helps OECD Members think about how to have an integrated application and reach different SDGs, while making them mutually reinforcing.

In addition, the recommendation very clearly states that PCD is an important contribution to this overall set of coherent PCSD elements. This is the transboundary dimension that needs to be considered as part of a reflection on how SDGs can be reached right now, how to address the long-term effects including the implications for future generations, and how can transboundary effects, in particular on developing countries, be included in that process. Hence, the recommendation very clearly references the ending of poverty, the human rights perspective, the requirement to consider development and development cooperation objectives as part of strategies and policies. The recommendation also stresses the importance of tracking and evaluating transboundary impacts and the effects on developing countries.

Mr Persaud listed the three main pillars that the OECD members find useful to achieve the above:

1. a strategic vision to address areas of incoherence
2. mechanisms to debate and engage stakeholders on these issues
3. tools to monitor and follow-up

The OECD work in this area is comprised of different elements. An important aspect is the exchange of experience within a challenging policy field. There is a network of PCSD focal points who meet twice a year. They are representatives of foreign ministries, environmental ministries and centres of government who share their insights, challenges and solutions.

Mr Persaud went on to discuss the policy advice, guidance and research the OECD produces, and gave three recent examples:

- a guidance note on implementing the PCSD recommendation, that was published in 2021
- support for Italy's national action plan on PCSD and financial assistance from the European Commission
- OECD and EC-JRC research report on transboundary impacts

He added that the OECD is also active in specific policy areas, for instance:

- foreign direct investments supporting the SDGs, for which the OECD published the FDI Qualities Policy Toolkit to strengthen the contribution of investments to the SDGs
- the OECD guidelines for multinational Enterprises on responsible business conduct

Furthermore, Mr Persaud zoomed in on the OECD-DAC development co-operation peer reviews, which provide in-depth examinations of the members of the Development Assistance Committee (DAC). These include 30 of the world's largest development cooperation providers as well as many EU Member States and the EU institutions. These peer reviews very often touch on policy coherence, highlighting good practices while also recommending actions for progress. Mr Persaud stressed that each policy area requires dedicated attention. Each area has different stakeholders, different synergies, trade-offs and policy options to consider. There might be progress in one area while in other areas progress stalls, so sometimes the OECD gives recommendations during peer-reviews, even when good practices are visible in other areas.

To deal with the challenge of policy coherence, the OECD has identified a number of good practices. The starting point is a commitment to policy coherence, and the EU has a very strong commitment in the Treaty on the Functioning of the European Union, This is made more concrete through priorities and planned

actions - for example, the Netherlands is currently updating its PCD action plan, which the OECD sees as a good practice.

Mr Persaud placed specific emphasis on the fact that line ministries, or line DGs in the case of the European Commission, should have the mandate, resources and capacity to think about how their policies contribute to global sustainable development. This cannot rely solely on foreign ministries or development cooperation institutions, which are often consulted relatively late, or they do not have the same subject matter expertise and they are not necessarily connected to the same stakeholders and especially domestic stakeholders that have a strong interest in the policy-making process. This is why having regulatory impact assessments are critical. Mr Persaud explained he was looking forward to seeing which lessons can be learned from the EU when applying the new Better regulation package and how line DGs can make full use of tools provided.

Another aspect Mr Persaud highlighted is that discussing challenges and mobilising support for coherent policies requires a lot of exchange with stakeholders and DAC members have experience with multi-stakeholder platforms, especially in value chains.

In this area, it is important to uphold multilateral agreements to establish a level playing field. A recent example from the OECD is the global minimum tax agreement. Members of the OECD play a very active role in bringing about such agreements and they are often leading by example in the application thereof.

Mr Persaud stressed that within this context, tracking and reporting on progress is critical because this is what informs debate over the years. Making policies more coherent is iterative and takes time, so regularly having the topic on the agenda is very important. Voluntary national reviews, like the one the EU is preparing, represent a good practice. It is an opportunity to show how domestic policies interact with development cooperation and with global SDG contributions. Hence, having dedicated evaluations is of utmost importance. The EU is one of the institutions that has done so, with other examples from Norway, Sweden and the Netherlands.

From a broader perspective, investing in global citizenship education is strongly linked to policy coherence because it helps raising awareness of policy coherence challenges and it creates a public expectation that policies will become more development-friendly. Here, Ireland could be cited as a prime example with a very dedicated approach to development education.

Mr Persaud concluded by highlighting two particularities that make the EU even more interesting from an OECD point of view:

- First, the important role in promoting PCD in EU Member States, requesting member states to report on PCD, sharing intelligence and analysis, organising debates, etc. These elements help to inform the thinking process in member states and they keep policy coherence for development on the agenda.
- It is also interesting to consider that Member States' thinking on policy coherence influences their engagement on regulation at European level. Where the legislative process is concerned, and since many EU policies have significant effects on developing countries, the better Member States understand policy coherence for development, the more likely they will be able to also promote coherent policies at a European level.

For information purposes, Mr Persaud listed some further relevant resources from the OECD:

1. the OECD recommendation on Policy Coherence for Sustainable Development, accompanied by a toolkit, country profiles and regular reports: <http://www.oecd.org/gov/pcsd/>
2. the platform Development Co-operation TIPS - Tools Insights Practices with a dedicated Fundamental on PCD, and practices from DAC members: oe.cd/tips

3. the OECD-DAC development co-operation peer reviews that identify good practices and give recommendations: <http://www.oecd.org/dac/peer-reviews/>

Ms Astra Bonini started her exposé by drawing on her work at the UN on how to build more coherence within the institution to deliver on the SDGs. Ms Bonini sits in the Division for Sustainable Development Goals in the UN Department of Economic and Social Affairs. Her team focuses very much on supporting member states and other stakeholders and on implementing the 2030 Agenda for Sustainable Development and the 17 SDGs. Ms Bonini explained that, coming from that perspective, she would share some of their approaches to policy coherence in the context of the SDGs.

Ms Bonini referred to the 2030 Agenda, which makes very explicit that the 17 SDGs are balanced across the three dimensions of sustainable development: the economic, the social and the environmental. This framing represents a holistic strategy for development, which requires sharing knowledge, pooling resources and making efforts to break down silos.

The 2019 SDGs report called for coordinated action through specific entry-points where multiple SDGs could be achieved. Some of them included food systems, energy systems, the global environment, and sustainable and just economies. The report stressed the importance of making use of synergies among the goals and managing trade-offs between the goals, warning that a narrow focus on the individual goals would only impair progress by not taking into account potential trade-offs. The SDGs must be seen as a holistic package of goals that need to be achieved simultaneously.

In practice, this is somewhat more complicated. It is thus key to consider how to go about taking a joined-up approach to development, how exactly can we break down silos and bring different actors and sectors together and how can we act cohesively to manage these trade-offs and identify and build synergies.

At the United Nations, one of the biggest steps in this direction, recently, has been through the reforms of the Resident Coordinator system at country level, where significant changes have been made to encourage a one-UN approach to supporting member states - which essentially brings all of the specialised UN agencies together with common narratives to approaching development challenges.

Ms Bonini went on to explain that there are also other initiatives, both formal and informal, being implemented across the organisation. She drew attention to two initiatives that her team has been most involved with recently:

- The Food System Summit. This event took place in September 2021 and was initiated by the UN Secretary-General with the hope to help change the way the world produces, consumes and thinks about food. This is a system where an integrated approach to development could touch many of the SDGs and thus many areas. Thus, from the beginning, this was not viewed as an event to be led by Food and Agriculture Organisation (FAO) alone, but as an event that would involve all parts of the UN system and stakeholders around the world to reflect the scope of the impact food systems have on all of the SDGs.

At the practical level, a UN system task force was established to be a platform for taking full advantage of assets across the multiplicity of UN institutions that are involved both directly and indirectly in food systems. The task force included UN agencies leading on food, on environment, on labour, on gender, development and many other issues at global and regional levels. Meetings were held on a quarterly basis. In addition, five working groups supported action tracks in food systems, looking at areas that need transformation in food systems. The deliverables were specific and led toward creating a common narrative on food systems across UN agencies, also creating greater awareness of the interlinked considerations that need to be taken into account and also building stronger networks among experts in different agencies to carry forward policy cohesion.

The task force would alternate between principal level participation and working level participation in order to strengthen cross-agency networks at both levels, namely the working level and the leadership

level. Also importantly, the coordination has continued after the summit. In Ms Bonini's opinion, the coordination mechanisms supported a much stronger and cohesive approach to the summit and their continuous nature help support the implementation of many of the actions and commitments that came out of the Food System Summit.

A food systems coordination hub was developed to leverage UN system resources across agencies and to mobilise coordinated support to countries to follow up on implementing some of the approaches they identified during the summit, as well as to advise countries on how to take a systems level approach in practice, drawing from expertise across all of the UN system.

- Another example regards the appropriations for the High-Level Political Forum on Sustainable Development that takes place each July to review progress toward the SDGs, to assess solutions and share ideas for accelerating progress. The HLPF takes place in July but there are many preparations that go on throughout the year at the UN. Ms Bonini's division coordinates the process across the UN system to review SDG progress and challenges for those specific goals that are under review in a given year.

The structure of the HLPF enables good cross-fertilisation of UN system agencies by bringing together different sets of goals that can be looked at in terms of their interlinkages, and also (but not exclusively) in terms of the SDGs.

In order to prepare for the HLPF, expert group meetings are hosted that review each SDG. Each consultation is co-convened by two to five UN Agencies that come together to share different perspectives and expertise, with contributions from outside experts from academia, government, civil society and the private sector and additional technical experts from other UN agencies. By involving many different stakeholders from across the development spectrum, these dialogues are more likely to identify some promising and innovative policies. In addition, they generate new partnerships that can drive transformations that have to be grounded in a multi-stakeholder and cross-UN approach to each SDG. This approach is also effective at breaking down these silos in day-to-day work and generating dialogue amongst stakeholders who might not normally come together to share ideas.

Ms Bonini concluded that approaches to cohesive policy-making are likely to vary across institutions and by specific issue areas, but creating these types of opportunities to work across sectors and bringing policy-makers and experts from different backgrounds together for dialogue and knowledge sharing can clearly contribute to more cohesive action. The EU continues to be a committed leader in action for the SDGs as well as in recognising the interlinked nature of development challenges. Efforts to continue to strengthen policy coherence will be really important, not only to address issues at home but also to address global challenges like food security, access to energy, climate action, poverty eradication, and that can really only be addressed with those multi-sector and multilateral approaches. Ms Bonini concluded by saying that the UN really looks forward to supporting these efforts to bring together the full breadth of expertise and resources for the development agenda.

3.2 Debate

The debate started with a short intervention by Mr Kuil, followed by a Q&A session.

Mr Kuil indicated that in his opinion, PCD implementation is key. He was curious to know to what extent PCD procedures and policies are implemented from a quantitative and a qualitative perspective. In addition, Mr Kuil was interested in learning about some examples from the past that were game-changers for EU policy coherence for development.

MEP Lucke, MEP for the S&D Group, took the floor and indicated that he felt encouraged by the panellists' presentations. He wanted to pick up on a point from an earlier intervention, i.e. that PCD is important for PCSD, and that in order to realise PCSD there is a need to first implement PCD. Because of this interrelation,

delivering PCD is a very important initial step from the European point of view. This is even more so if we take into account that we are lagging behind on the delivery of the Agenda 2030/ SDGs. As a result, he believed it was essential that the EU increases its efforts on SDG delivery and searches to implement PCSD in an appropriate manner. MEP Lucke continued to explain that when reviewing all the PCD evaluations, comments and discussions he had come across thus far, he saw quite a dim picture. Although steps were being taken, he believed there was still room for improvement. He thus wanted to know if the Commission concurs with his assessment that more efforts need to be dedicated to PCD in the future. In this respect, he also wanted to know what concrete next steps could be taken to improve PCD application, including at the political level.

Mr Dionisie explained that his presentation and that of his colleague from DG INTPA were rather focused on the efforts that are being made and the system that has been put in place. He added that we have to acknowledge that the global environment has deteriorated quite significantly over the past few years and that the challenges at the global and European levels have amplified. The inclusion of PCD within the development of the EU's policy approach has existed since the beginning of the Better Regulation Agenda at the Commission, with the first adoption of the Better Regulation guidelines and the toolbox in 2015, the update thereof in 2017 as well as last year in 2021, where each time more emphasis was put on these aspects. In terms of policy development, Mr Dionisie found good examples where this has made a difference, for instance, the common agricultural policy and how measures have been prompted by the approach to policy coherence for development. DG JUST put forward a proposal on sustainable corporate governance due diligence, which aims precisely at improving the behaviour of businesses throughout their supply chains and ensuring that businesses have systems in place that guarantee that their practices do not harm developing countries.

Mr Probst added that it was important to look at what policy coherence for development is about and what it can and cannot achieve. When looking at Article 208 TFEU and the re-definition of what PCD is in the framework of the 2030 Agenda, it is understood that PCD should support developing countries to achieve the SDGs - not more, not less. That means that there are also other mechanisms that have to come in to support developing countries achieve the SDGs. Mr Probst further pointed to the current difficult environment, marked by Covid-19 and other crises, which makes it difficult to make progress on the SDGs in developing countries. He further emphasised that the focus should be on what the EU can do to improve the mechanisms and tools that make it possible to live up to the commitment contained in Article 208 TFEU. Mr Probst concluded that in the past few years the EU has had a strong qualitative jump ahead in providing the framework to live up to the PCD commitment on PCD of Article 208, as also recognised by the OECD mid-term review.

Mr Persaud intervened on whether the picture is currently bleak.

Firstly, he underlined the question of speed. For example, as regards climate, there is progress in a number of areas. In a previous presentation, it was mentioned that the proposal for a Due Diligence Directive is causing evolutions. In the OECD's last peer review of the EU, the reduction of export subsidies in the agricultural sector is mentioned. Doing so took a long time but the reference was adopted at some point. Mr Persaud explained that the key question here is whether that is quick enough to reach the SDGs by 2030 and where the right contributions are being made.

Secondly, Mr Persaud built on the previous comments by explaining that the EU has in place mechanisms to be very systematic, to dig deep into issues and understand the effects. Such mechanisms can be helpful, yet policy coherence for development remains a very political undertaking. Hence, it is necessary to try to find the synergies and the trade-offs and to look for policy options that are acceptable to all. This cannot be resolved through mechanisms or good analysis, it requires political negotiation as well as convincing stakeholders and finding consensus around good solutions that work for everyone, not only here but also

in developing countries. That represents a major challenge in each policy area. Hence, the mechanisms that the Commission has in place can help with that, they could identify good options and put proposals on the table, but ultimately those will have to be negotiated. That circles back to the question of global citizenship education and raising development awareness because this also changes the overall readiness to accept reform measures that are more development-friendly.

Ms Bonini wanted to share her perspective on the issue of how bleak things have become in the current context. Europe was hit very hard by the pandemic, with tragic socio-economic impacts and loss of life. Nevertheless, the EU has the ambition and political vision to redouble efforts towards sustainable development. It is not necessarily the EU's intention to go back to 2019, to the contrary, the EU has seized the moment to move forward toward a more sustainable future. The European Green Deal and the Next Generation EU are all examples of how the EU is really taking this moment as an opportunity to try to bring about the types of long-term changes that are so needed. Ms Bonini explained that from the UN's perspective, it is always great to have that kind of leadership pointed in the direction of the SDGs as that can then be shared with other countries.

4 Panel 2: Challenges and gaps in PCD implementation

Panel 2 included presentations from Dr Ondřej Horký-Hlucháň, Senior Researcher (Institute of International Relations Prague), Ms Elisabeth Diaz Hochmann, Senior Programme Officer (UN Development Coordination Office Brussels) and Ms Lisanne van der Steeg, Member of the Policy Coherence for Sustainable Development working group (CONCORD).

4.1 Presentation by academic expert and stakeholders' contributions

Dr Ondřej Horký-Hlucháň, author of the report 'Ensuring transparent and impactful Policy Coherence for Development', structured his intervention around the main messages and recommendations from his research, which consisted of a participative exercise with about 20 interviews throughout the European Institutions and the European delegations and other actors. He explained that the main message of this research is already reflected in the title, 'Ensuring transparent and impactful policy coherence for development'. He stressed that even though we have the systems in place, PCD needs to become more transparent and impactful in order to make the SDGs work without leaving anyone behind.

He focused on three points:

1. He based his review on the expertise of the OECD on how policy coherence should be put into practice. He added that it has become the state-of-the-art model of the elements that are required for PCD to work.
2. In addition, he emphasised the external evaluation of the EU's policy coherence for development that was published in 2018 as a very important source for his research. Taking on board the recommendations from this evaluation, that was commissioned by the Commission, would be very useful for the system to work.
3. Regarding the Better Regulation guidelines, which represent good progress for PCD, yet he pointed out that not only the technical side matters, but also the values that are behind that. They are required to have evidence-based policies. Policy-making should be transparent and it should be participatory, which is still not the case for the whole policy cycle of PCD.

In his research, Dr Ondřej Horký-Hlucháň used traffic lights as indicators for the progress made on the eight main elements that the OECD judges to be important and necessary for PCD to work in practice. All the

tools regarding policy effects, different impact assessments, ex-post evaluations, etc. are ready to use. However, this does not mean that the EU effectively uses these tools.

Dr Ondřej Horký-Hlucháň explained that about 10 to 15 years ago, the Council was the leading force regarding PCD, but nowadays the energy seems to have shifted to the Parliament. The Member States are not every active. This could be explained by the transition from PCD to PCSD, which required a lot of capacities from the member states to adapt their national systems. Hence, strong action by the Council is required.

The EU ranks halfway on political commitment. Positive aspects are the treaty obligation as well as the 2018 external evaluation, which was based on many interviews and showed that there is no clear understanding within the European Institutions of what the PCD commitment actually entails

According to Dr Ondřej Horký-Hlucháň, this lack of a clear understanding is strongly related to the problem of policy coordination, since currently there is no real centre of coordination, especially at the level of the European Commission where it is pretty much disperse, since the dissolution of the PCD unit. This lack of concentrated capacities also shows that the weakest performance of the EU is in the area of monitoring and reporting. The EC PCD reports were supposed to be published every two years and that does not really happen. These reports should not just summarise what happened during those two years, but be drafted in the spirit of the Better Regulation, which means setting certain priorities, monitoring them, giving responsibility to different parts of the EU, etc. The lack of a centralized policy coordination is tangible in this regard.

One of the EU's strong points, according to Dr Ondřej Horký-Hlucháň, is the European Green Deal, yet there remains a problem with policy integration because outside of the scope of DG INTPA, many initiatives are focused on the environmental side. One could ask whether the needs of developing countries and the livelihood of the poorest people on the planet are really taken into account in these tools.

Often, the impact on developing countries is taken into consideration, but that consideration is limited to the mere conclusion of the fact that some jobs will be lost. There are impact assessments done but often these lack details or follow-up. The case of the deforestation regulation is a good example: the Parliament actually put emphasis on the interest of LDCs and possible delays in the regulation's implementation for the smallholders to get a certification for their product to not to lose access to the European market, as is the case for coffee in Guatemala. The EU delegations try to do a lot of work to follow-up with the corporation to prepare them, but that is not enough. A better flow of information and better consideration of the impact on the livelihoods of the poorest people on the planet, from the start of the initiatives, are required. This starts with policy coordination within the European Commission.

A positive takeaway, according to Dr Ondřej Horký-Hlucháň, is the fact that SDGs are mainstreamed, which is also apparent from the interviews conducted for his research. The Green Deal is also being implemented despite the crisis the world is facing. Considering the strong drive, e.g. for climate issues, it is important to avoid negative economic and social impacts in our partner countries. Here, Dr Ondřej Horký-Hlucháň stressed that PCD is related to the principle of 'leave no one behind'. Dr. Ondřej Horký-Hlucháň concluded that:

- the European Consensus on development needs to be materialised inter-institutionally for enhancing PCD, with 'do no harm' as a main guiding principle to check for negative effects of policy proposals.
- it is important to have, in addition to political will, more capacities. Therefore, Dr Ondřej Horký-Hlucháň would restore the PCD unit to monitor set goals and to evaluate PCD beyond the biannual reports.
- the EU delegations are key actors; the fact that PCD is included in the structure of the progress reports sent by EU delegations to EU headquarters is a positive aspect but at the same time there is a lack of

subsequent feedback despite the strong support from the headquarters for the delegations to work on PCD and to introduce PCD into the policy dialogue with partner countries.

- Some delegations are doing particular efforts to communicate with all the stakeholders to execute projects and to develop their capacities to evaluate the impacts of EU policies. This approach should be replicated throughout the External Action Service.
- a triologue on policy coherence with the UN and OECD is required.
- PCD should also be considered from a geopolitical point of view, as there is a big gap in the perception of the EU as a geopolitical actor in our partner countries. There are very strong pragmatic arguments to take PCD on board to have more allies in this geopolitical setting worldwide.

Prompted by a question received by MEP Janina Ochojska, Dr Ondřej Horký-Hlucháň elaborated on the difference between PCD and PCSD. He explained that PCD is a contribution to PCSD but that PCSD has many other dimensions. It does not only apply to the donors, which are the countries of the Global North, and to the countries of the Global South, but also takes into account the coherence between the environmental, social and economic aspects. The PCD definition also considers all the governance levels with a red line going from the UN level to the local level. Dr Ondřej Horký-Hlucháň added that PCD is a very promising concept but at the same time it is very difficult to put into practice. The discussions about its operationalisation are ongoing and each of the UN member states finds different ways to put it into practice. There is still a long way to go to reach sustainable development. On the other hand, PCD is relatively more simple. We have the technical tools at hand. What is now needed is to take PCD implementation seriously on a policy level and provide the coordination and policy capacities that are required to put this principle into practice.

Ms Elisabeth Diaz Hochmann started her intervention by mentioning that the Agenda 2030 and the SDGs are really a call to action on all of us to end extreme poverty, fight inequality and injustice and protect our planet.

The EU has been a strong supporter of this agenda from its conceptualisation, and has been a consistent advocate since. Its approach to policy coherence for development is framed within the context of Agenda 2030. In view of this ambitious agenda and the challenges imposed by the SDGs, the development pillar of the United Nations had to reform to deliver on what was expected by its member states. In that spirit, the UN development system reform was voted by the UN general assembly in 2018 to enable more coherent and impactful union-wide support to SDG implementation. Ms Hochmann indicated she would focus specifically on the components of the reform that are directly contributing to increase policy coherence for development.

1. The first component that we see as fundamental is leadership. At country level and for the development pillar of the UN, the various UN entities working together to deliver development solutions have different mandates and are working under the strategic coordination of a Resident Coordinator (RC). Together, the UN entities and the RC deliver that collective leadership to advance the SDGs in a country. The RC reports directly to the UN Secretary-General, doesn't have an operational role, doesn't implement projects or programmes and is supported by a small office and by Ms Hochmann's Development Coordination Office at regional and global level. The RC plays a role in facilitating the distribution of expertise from across the UN system, whether they are present in the country or not, and they convene partners to drive development responses from the UN that are more coherent, integrated and effective.

One example is Egypt: at the government's request and within the context of the Egyptian's presidency of the Cop 27, the Resident Coordinator is acting as the main strategic interlocutor and

connector to reduce the transaction costs both for the government, the partners and the UN in-country, and is enabling coordinated action to deliver on the results expected by the presidency.

2. Component two is about joint SDG analytical, strategic planning and programmatic tools that are tied with accountability for results. With the reform, the UN, under the leadership of the Resident Coordinator, is expected to use all its assets at all levels as well as connect with external resources to provide top-notch analysis in support of national efforts to advance the Agenda 2030. This is usually done by a common country analysis but there are also other joint analytical tools and these really constitute the basis for the strategy that is then developed with national partners. That framework is called a cooperation framework and it is the main tool that the UN has at its disposal in-country to strengthen its policy and programmatic coherence, avoiding to the maximum extent siloed approaches, very much in line with national development priorities.

In Kenya, for instance, as a result of the development of that new cooperation framework, there is a commitment from all UN entities to reach 50 % of joint programming over the next four years. In Uzbekistan, the UN consulted with more than 1600 people, organized 32 workshops with a wide range of consultations with local actors and with development partners, and reached an agreement with IFIs to lead to an increased level of financing for the country, in alignment with their socio-economic recovery priorities.

That tool really is the main accountability tool for policy coherence in a country, because it is signed with a national government. In addition, there is an obligation to report on it annually through a public report that is presented and shared with all partners. Of course, the European Union as the other development partner is consulted as part as the analysis and the development of the strategy in country.

Also, the Covid-19 pandemic has been an accelerator of these ongoing efforts to drive further policy coherence. It has been a wake-up call in terms of the urgency of delivering development, and so there was a strong effort made to develop a global framework for Covid-19 socio-economic response back in 2020, which was then applied in all countries. In some cases, the country efforts were carried out with development partners and joint assessments were made. In the case of Ecuador, the country efforts were carried out with development partners and the UN, the EU and the World Bank supported a joint impact assessment of the Covid 19 pandemic that later served as an input for the national social protection strategy.

3. Component three is really about promoting alignments among development partners and convening multi-stakeholder partnerships. The Resident Coordinator has a convening role which, if leveraged well, can really push forward increased policy coherence among development partners in a country and generate concrete results.

A good example hails from Thailand, where the RC worked with various UN agencies with a global compact private sector network, with the Thai government Pension Fund and with development partners. This process created a sustainable finance stakeholder mapping which then through a consultation process in the government led to 43 financial institutions pledging assets of a value of USD 1.3 trillion for the SDGs in the country. Hence, leveraging the available funding to meet the partner government's needs is a very important element of policy coherence.

4. Component four is about financial incentives. They are important because they can drive further policy coherence. There are global programmes that are being implemented in multiple countries which actually the EU has been a key partner and funder for. For example, the Spotlight Initiative is a unique EU-UN global partnership which has been the most important investment to end all forms of violence against women and girls in 27 countries. There are other examples, like global funds such as the Joint SDG fund to which the EU also contributes. This fund is meant to support countries' advance towards

the SDGs and to work with various multi-stakeholder partnerships. Finally, there are also other mechanisms at country level that can help generate the right set of incentives to push forward more coherence in terms of development.

5. Component five, finally, is about strengthening accountability systems. There is mutual accountability between the Resident Coordinator and the UN entities. That has been put in place to ensure the reform is actually being implemented and individual entities have adjusted their internal strategies, policies and institutional incentives to demonstrate the contribution to the effort towards more joint policy and programmatic efforts.

As a development system, the UN reports to member states annually in the Economic and Social Council of the UN, and this is a very clear accountability mechanism.

Ms Hochmann summarised that the main elements are empowered and collective leadership, joint SDG analytical and programmatic tools, convening multi-stakeholder partnerships, financial incentives and the strengthened accountability frameworks that have been proven to be essential for improving the UN's policy coherence for development.

There are of course challenges. Change is hard because it is also about behavioural and cultural change to move from a tendency to siloed approaches or project-based approaches towards a more integrated policy approach. This can have implications in terms of the UN footprint in the country. The right set of institutional incentives is required to push that change forward.

The leadership aspect can also be improved. As part of the follow-up to the EU-UN High Level Dialogue that took place in July of this year, discussions are ongoing to leverage the EU reform with the Team Europe initiative and the UN reform to verify how we can take the best advantage of the complementarities and synergies between UN and EU in-country and how we can also leverage partnerships around that. Here, the Resident Coordinators can play an important part together with the EU Heads of Delegation and corporations.

There are also good developments where the financial incentives are concerned, but these also still present challenges in terms of the type of funding that the UN receives. Funding needs to be more flexible and more predictable to create more coherence.

Ms Hochmann concluded by stressing how important policy coherence is. In view of the high complexity of the world and the urgent need to rescue the SDGs, since we're going backwards and not forward on the SDGs, more policy coherence is required, not only within our respective organizations but also across organisations. Ms Hochmann considers the Global Crisis Response Group on Food, Energy and Finance as well as the way in which the recommendations are being used across the community of development partners as an encouraging sign. Policy coherence for development is strongly linked to strengthening multi-lateralism, which both the EU and the UN share as priorities.

Ms Lianne van der Steeg started her intervention by drawing attention to an example pertaining to the topic of the workshop.

Europe's wealthiest countries are sending their plastic trash to Turkey to recycle. In that process, it consigns some of the most vulnerable communities over there, including children, refugees and migrants, to serious and environmental health risks. The EU and individual countries should take responsibility for their plastic waste and end the export of plastic if certain safety measures cannot be guaranteed. Importantly, they should also reduce the amount of plastic. The EU's mission to become a circular economy and to implement a green deal is very good but as the wealthiest group of nations in the world, the EU has the responsibility to shoulder the cost of its own waste and to become self-sufficient. If plastic is shipped outside the EU, the recycling thereof should not cause this much damage to other people. This example shows that the non-implementation of the PCD obligation by the EU and the Member States has

devastating consequences on people's lives and the environment in partner countries. It demonstrates that the EU needs to take into account long-term and transboundary considerations into its policy-making.

Ms van der Steeg stressed the importance of a more integrated and long-term approach of EU policy-making. Efforts for policy coherence for sustainable development should not aim only to minimize negative external impacts, they should aim at a fundamentally changed economic, social and political system to such an extent that future generations will be able to live in a world free from poverty, in which human rights and planetary boundaries are respected and no one is left behind.

Ms van der Steeg also underlined the importance of ensuring the improvement of policy coherence for sustainable development within all policy areas with an impact on third countries: from the Green Deal to tax legislation, from trade agreements to the common agriculture policy. Therefore, it is important to create mechanisms and structural systems that are applicable to internal and external policies. By giving a structural place to PCSD, it is possible to prevent and address the negative impacts of EU policies. It also gives more credibility to the EU as a reliable and responsible partner.

Ms van der Steeg continued by giving three recommendations:

1. Impact assessments should be a part of all policies. The European Commission should work together with the European Parliament to ensure that PCSD is integrated into all legislative and policy processes. By not making it a part of every policy, blind spots remain unnoticed. When talking about an internal policy that might have a very big impact on countries on the other side of the world, that needs to be verified before implementing the policy. This would also make the development more effective. The EP should ask the Commission to conduct these assessments of all policies systematically. Work is being done to create a fundamental change in those impact assessments, but there is also a need for interlinkages, synergies and trade-offs between all the dimensions of sustainable development, also taking into consideration the impact of the EU policies on the global South. This would ensure that EU policies have to achieve the SDGs both in Europe and globally.

Human rights including economic and social rights as well as gender equality must be taken more seriously into account in all impact assessments.

2. Secondly, The European Commission must make sure that where an impact on developing countries is likely, this is taken into account from the very start. In addition, policies should be radically revised based on the findings of the impact assessment. It is necessary to go beyond the mere realisation of a negative impact, policies should actually be modified when a negative impact is found. To do so and to make the impact assessments more useful, a meaningful engagement of civil society is required. The affected communities should be consulted when proposals and impact assessments are being prepared.

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, especially those local communities that are affected by EU policies. They know what really plays on the ground and know how that policy is going to affect their lives.

The EU must ensure that the perspectives of the local communities are included in the impact assessment, including taking into account the views of women and girls who rarely have a voice but are most affected.

3. And thirdly, Ms van der Steeg wanted to tackle the coordination mechanisms. The EP should urge the European Commission to create an inter-service group within the European Commission with a clear mandate to guarantee PCSD, decide on trade-offs, make them visible and align external and internal policies in the framework of the 2030 Agenda and with the political mandate to request adjustments to policies in case of incoherence or negative impacts on the global and EU partner countries .

Commissioners should be made responsible for the impact of respective policies on other policies here and now, but also on the sustainable development of partner countries, and on future generations.

Ms van der Steeg concluded her intervention by looking at what the European Parliament can do. The Parliament can fulfil a key role in monitoring the implementations of the commitments to PCSD made by the European Commission and the Member States and keep the EU accountable. Within the Parliament, a network needs to be established across different committees in order to make sure that PCSD is a responsibility that goes beyond the DEVE committee. Members of Parliament who are not a member of the DEVE Committee can make a huge difference, exactly by raising the question of policy coherence in the specific policy field they work in, be it energy, agriculture or trade.

There is no single mechanism or quick fix to promote policy coherence for sustainable development. Rather, its success depends on a series of complementary tools. Ms van der Steeg urged that now is the time to take responsibility for the impact of EU policies and take action. To obtain that goal, political will is needed, also within the European Parliament where the European Commission can be urged to take PCSD more seriously as a key tool to achieve sustainable development goals and to make PCSD a reality.

4.2 Debate

MEP Karsten Lucke opened the debate by making three final remarks.

First, drawing on the lessons learned during the workshop, Mr Lucke felt reassured in his assessment that a lot remains to be done, especially with regards to the obligation to implement monitoring and to require the European Commission drive up the PCD commitment.

Second, Mr Lucke wanted to address the first panel. The world is jumping from crisis to crisis, which is soaking up different resources, but one cannot keep on using crises as an excuse to not be better on what needs to be done. We are in the third year of the pandemic and from now onwards we need to make a greater effort. Mr Lucke also agreed with what Ms Hochmann stated. Of course, the EU is a role model, but it can also deliver more because it has much more capacity and much more resources. Hence, the EU needs to deliver and show the commitment it is capable of. The crisis should not be an excuse, because the world will have to deal with many crises in the coming years and decades. Being a light tower and a shining, bright example can also stimulate the EU to do better and move forward.

As a third remark, Mr Lucke wanted to address a question to Dr Ondřej Horký-Hlucháň about his recommendation to restore the PCD unit. Mr Lucke inquired when this PCD unit was in existence and why it was lost in the first place.

Dr Ondřej Horký-Hlucháň responded by explaining that his statement stemmed from the reorganisation of DG INTPA with the intention to bring PCD assessment closer to the topical issues. In hindsight, the realisation was made that one cannot dissolve everything into the SDGs because when a policy is strongly focused on the environment, there is not enough attention for the social and economic aspect and the impact on the livelihood of the people in these countries.

Elaborating on his research, based on 20 interviews, **Dr Ondřej Horký-Hlucháň** found a lack of clarity on what PCD means. In his opinion, there is no agreement on what level we should make a commitment. If our policies remain as 'business as usual', not much changes. Impact assessments are not the panacea for PCD. Dr Ondřej Horký-Hlucháň gave the example of the carbon border adjustment mechanism. Recently, a trialogue was held on this subject with disagreements between the Parliament and the Council on the use of the finances that will be gathered through this mechanism. An impact assessment on the carbon border adjustment mechanism has been made, which clearly states that the export of aluminium from Mozambique, which accounts for 7 % of the GDP, would be very much affected. That is also where the impact assessment stops; it does not investigate what this will mean for the budget of the government of

Mozambique, how much this will affect its ability to fund health service, schooling, etc. These checks on social impacts need to be made earlier within the Commission.

Mr Dionisie continued on the same subject and stressed that the very concept of Better Regulation makes a distinction between the impact assessment and the political decision and the policy. The Commission does not make legislation, it only proposes and then the co-legislators make the political decisions. Of course, an impact assessment is executed by the Commission which is made public as soon as the proposal is adopted to make it accessible to the co-legislators. During the legislative process, amendments and changes are made. According to Mr Dionisie, it would actually be a very good step forward to have a similar level of analysis to the impacts when there are changes in the legislative process that have not been covered by the initial impact assessment. The impact assessment is not actually the policy decision, it is just the evidence that is used to make an informed political decision.

In addition, Mr Dionisie explained that an assessment of the human rights impacts is already implemented, as his Directorate-General is in charge of the impact assessment where fundamental rights are concerned. The human rights impact is one of the elements of the mandatory assessment provided by Better Regulation, as is the consultation of civil society. The Better Regulation process requires a systematic consultation of civil society and the public at large. Part of the most recent upgrades concern public consultation, which is streamlined, and made more efficient. Consultation fatigue also exists, so it does require an investment to be able to engage with the process and to provide meaningful input from the stakeholders. Every impact assessment includes a summary of all the consultations carried out. Mr Dionisie added that of course, there is always room for improvement.

Mr Probst went on to explain that in fact, there never was an actual PCD unit, it was a team working on PCD, coordinating with colleagues who worked on different files. Within the framework of the reorganisation of DG INTPA, the responsibility to coordinate on different policy files with the line DG has now shifted to thematic units. Mr Probst added that this is a sign of progress, since these units also have the explicit responsibility to look for the external dimension of internal policies, reflecting how the Commission acts as a whole.

Ms van der Steeg intervened by stating that if the impact assessments were implemented well, the proposals from the Commission would always consider the impact on partner countries and developing countries. The Better Regulation Agenda has been a great step toward integration, but Ms van der Steeg sees a long way to go for the implementation part.

Ms Eva Luna Maes, Policy and Advocacy Assistant at Concord Europe, wanted to address a question to Commission colleagues regarding the integration of the PCD report into the EU voluntary review. Ms Maes pointed out that it is important to keep monitoring PCD efforts. First, there was a commitment to do a report every two years, then that frequency was changed to every 4 years and now it is integrated into the voluntary review, which leads to worries that this PCD aspect will get lost in this huge exercise on collecting input from every DG.

In addition, Ms Maes felt it is important to use this exercise of the EU review to improve the EU methodology on PCD reporting to make sure that there is more transparency, so civil society can also monitor PCD efforts. More specifically, Ms Maes explained that, especially within the Member States, there needs to be more development of evidence-based indicators which cover the targets and goals of the SDGs in relation to transboundary effects. The EU or a specific member state can for example perform well for SDG 12 on responsible consumption and production, but there needs to be an evidence-based indicator for how much emission is being imported during that process. These evidence-based indicators are currently not included in the reporting by member states. In addition, Ms Maes recommended that work should be done to develop methodologies for the EU delegations to systematically collect evidence on how EU policies are

impacting partner countries. Currently, this is dealt with on an ad hoc basis and it should be taken more seriously so the negative and positive impacts of EU policies can be monitored.

Regarding EU voluntary review, **Mr Probst** highlighted that the EC's intention is to fully integrate PCD reporting into the EU voluntary review, which has been welcomed in principle by the Council and the Parliament. First there will be a political document where PCD will have its place, which will be adopted by the Commission. The preceding PCD reports have been staff working documents. In Mr Probst's opinion, this is already quite a big qualitative step ahead. There could be an annex, where the PCD dimension of the SDGs is considered. SDG attainment or endeavours to achieve SDGs will be closely linked to the work that is done on PCD. Since 2 years, Eurostat has been working on transboundary spill over effects on different SDGs as far as the evidence and findings are there and usable. These indicators and findings will then also be used in SDG reporting on PCD.

In her closing remarks, **MEP Janina Ochojska** thanked all speakers and participants for their interest. She added that she hoped the workshop had given the attendees an opportunity to broaden their knowledge on PCD and to further reflect on how it can be put into practice more effectively.

Annex - Speakers' bios.

Panel 1: Policy and legal approaches to PCD implementation

Norbert PROBST, joined the European Commission in 1999 where he has worked in various departments (fisheries, trade, development cooperation). He is currently Policy Officer in Unit D1 (Effective Development Policy and Team Europe) of the Directorate-General for International Partnerships (DG INTPA), responsible for Policy Coherence for Development (PCD). Prior to joining the European Commission, Norbert Probst worked, from 1992 to 1999, as parliamentary assistant in the European Parliament.

Dan DIONISIE leads the Economic analysis and evaluation unit at DG Justice and Consumers, which helps develop the evidence base that underpins justice, consumer, equality and fundamental rights policies of the European Commission. He joined the Commission in 2012 as Head of Unit for Consumer markets at DG Health and Consumers, in charge with monitoring consumer conditions in the EU's Internal Market and researching consumer behaviour to inform relevant policies, in particular linked to the Digital Single Market and the New Deal for Consumers. Before joining the Commission, Dan worked at the United Nations Development Programme (UNDP) on democratic governance, public administration reforms, anti-corruption, as a foreign affairs expert at the Presidency of Romania and as teaching assistant in political science at the University of Bucharest. His academic background is in political science and in computer engineering.

Santhosh PERSAUD is Policy Analyst at the OECD Development Co-operation Directorate. Santhosh joined the OECD in 2018, where he conducts development co-operation peer reviews of members of the Development Assistance Committee (DAC). He is also the Directorate's focal point for policy coherence for sustainable development. Prior to joining the OECD, he worked for the German Federal Ministry of Economic Cooperation and Development (BMZ). Previous positions include Seconded National Expert at the European Commission, working on the EU's policy on forced displacement and development, Head of Cooperation at the German embassy in Burkina Faso and desk officer in BMZ's South Asia Division. Before joining BMZ, he worked as an Associate Protection Officer in UNHCR's Statelessness Unit.

Astra BONINI is a Senior Sustainable Development Officer with the United Nations Department of Economic and Social Affairs (UNDESA) in the Division for Sustainable Development Goals which provides analysis of progress toward the Sustainable Development Goals (SDGs), including through cross-sectoral approaches. Her work involves evidence-based policy support in such areas as technology facilitation, the green economy, sustainable transport, climate change and the nexus among energy, food and water. Prior to joining UNDESA, Astra was a senior researcher with the Human Development Report Office of the United Nations Development Programme and a Postdoctoral Research Scholar with the Committee on Global Thought at Columbia University. Astra earned her PhD in sociology from the Johns Hopkins University and has a Master of International Affairs Degree from Columbia University as well as a bachelor's degree in civil engineering.

Panel 2: Challenges and gaps in PCD implementation

Dr Ondřej HORKÝ-HLUCHÁŇ is a senior researcher at the Institute of International Relations (IIR) in Prague, Czech Republic. Having predominantly published on development cooperation policies of Central and Eastern European countries, he now focuses on the concept of Policy Coherence for Sustainable Development and its implementation in the larger framework of global governance. With field research experience from Sub-Saharan Africa, he has provided thematic and regional policy research and expertise for the Czech Ministry of Foreign Affairs, the Visegrad Group, the European Parliament, OECD and UNDP. He is a member of the executive committee of the European Association of Development Research and Training Institutes (EADI).

Elisabeth DIAZ HOCHMANN has over 20 years of development experience working at country, regional and Headquarters level in the United Nations across various entities, including the United Nations Development Programme, UN Women and OCHA. She is currently Senior Programme Officer in the Development Coordination Office and is part of the UN Brussels team in charge of advancing the engagement of the UN Resident Coordinator's system with the European Union. She has worked in development and humanitarian coordination and programming in various countries, including in Haiti and in the Latin American and Caribbean region. A French national, she has an M.A in International Affairs from the School of International and Public Affairs of Columbia University, New York, and an M.A cum laude in Political Sciences from Sciences-Po Paris, France.

Lisanne VAN DER STEEG works as Policy advisor for Woord en Daad and is a member of the PCSD working group of CONCORD. Woord en Daad is an NGO active in 22 countries worldwide, helping different vulnerable groups, and is a member of Partos, the Dutch National Platform. Through our programs – Agricultural Development, Awareness Raising, Sustainable Water, Education and Emergency Aid and Resilience – we have been working on sustainable change for 45 years. CONCORD is the Confederation of European NGOs working on sustainable development and international cooperation. With the support of 58 members, our Confederation, representing over 2,600 NGOs, is the main interlocutor with the EU institutions on sustainable development policy and international cooperation. We work towards achieving equal, just and inclusive societies in a sustainable world. We also work with regional and global civil society allies to ensure that EU policies are coherent in promoting sustainable development in partner countries.

PE 702.571
EP/EXPO/DEVE/FWC/2019-01/LOT3/1/C/09

Print ISBN 978-92-846-9958-2 | doi:10.2861/477973 | QA-09-22-654-EN-C
PDF ISBN 978-92-846-9959-9 | doi:10.2861/953672 | QA-09-22-654-EN-N