

CONCORD responses to the EU SDG Multi-stakeholder Platform targeted consultation

'TOWARDS A SUSTAINABLE EUROPE BY 2030' ON THE FOLLOW-UP TO THE UN SUSTAINABLE DEVELOPMENT GOALS, INCLUDING ON THE PARIS AGREEMENT ON CLIMATE CHANGE

BACKGROUND

The Commission Decision setting up the multi-stakeholder platform on the implementation of the Sustainable Development Goals in the EU (C(2017)2941 final) states that the platform should 'contribute to the reflection work preparing for the long term implementation of the Sustainable Development Goals, as well as to the assessment of the progress made and making suggestions for more effective implementation on this basis'. On 13 September, the Commission President, in his letter of intent, announced a sixth Reflection Paper 'Towards a Sustainable Europe by 2030' on the follow-up to the UN Sustainable Development Goals, including on the Paris Agreement on Climate Change.

In the framework of this Reflection Paper, which is planned for publication in the second half of 2018, the Commission sought the views of the members of the SDG multi-stakeholder Platform. Answers to the consultation questions included in this document were expected by 21 February 2018. In order to collect the variety of views of all members of the multi-stakeholder Platform, the consultation was addressed to each member individually.

The Platform secretariat will then consolidate all inputs received and submit a summary document to the Management Committee ahead of their meeting of 14 March 2018. Following the preparatory work of the Management Committee, the Platform will be able to exchange views and possibly finalise their contribution during their second meeting of October 2018.

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QUESTIONS AND CONCORD RESPONSES

Topic 1: Focus of sectoral policies after 2020.

*Achieving the seventeen SDGs needs a comprehensive approach. Members of the Management Committee have identified several EU **policy areas** which they consider require special attention. In broad terms, these areas include: Employment and social policy; Migration and Trade; Agriculture; Cohesion policy; the Circular economy package; Taxation; Economic and Monetary Union; the Banking Union; EU energy and climate policy.*

Question 1.1: Please list a limited number, preferably between one and five, of priority policy areas for achieving the SDGs in Europe in the post-2020 perspective.

The 2030 Agenda for sustainable development is an integrated agenda, hence cannot be achieved by cherry picking some goal areas over others. Instead of focusing on low-hanging fruits, it is important for the EU to prioritise efforts in the areas where it has the biggest gaps and where the EU is furthest away from reaching its targets as indicated by the Eurostat SDG progress report and other relevant documents. For CONCORD, this means the EU should prioritise efforts in the following 5 areas:

Close the inequality gap

The EU must do more to reduce the extreme inequalities that exist both between and within countries. The benefits of globalisation are unevenly distributed as a result of unequal power relations between and within countries, and between poor host countries and the transnational companies that operate in them. This implies that the most marginalised and poorest people and countries must

be given greater opportunities and a level playing field created. Key to this is to focus on redistributive policies (such as taxation and social protection) to reduce the concentration of wealth and power. A whole range of other policies would also need to be reviewed to this end, including international financing rules, trade policy, investment, agriculture, labour standards, and social policies such as education and healthcare.

Care about our well-being, not only GDP

To ensure that all policies work in the interests of all people and the planet, we must radically review our definitions and concept of progress. Progress needs to be viewed in terms of improved well-being for all (mindful of gender, age, income, race, ethnicity, migratory status, disability, location etc.) while fully respecting the planet. The EU should adopt a common set of indicators which encapsulate the concept of “well-being” from the social, economic, environmental and governance perspectives. These indicators should be used to guide future policy and decision-making in all areas in addition to Gross Domestic Product.

Help to achieve gender equality and empower women and girls worldwide

Gender equality is, most importantly, a fundamental human right but also necessary for global development and the achievement of a peaceful, prosperous and sustainable world. Although many important steps have been taken, women and girls continue to suffer structural discrimination and widespread violence across the world today, and in some parts of the world we are witnessing serious backlashes against women’s and girl’s rights. Violence against women and girls remains one of the greatest challenges to achieve gender equality and should be prioritised by the EU, as well as ensuring the respect and fulfillment of their sexual and reproductive health and rights. The EU should step up its efforts to contribute to the achievement of gender equality and the empowerment of women and girls worldwide.

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Build a fair and just food system

The EU should make sure that all the EU’s investments in agriculture, whether in Europe or abroad, are sustainable, resilient and eco-friendly. This means: a focus on small producers, especially female and young, and on rural economies, ecosystems and biodiversity. The EU should also put the right to food at the centre of the EU’s contribution to sustainable agriculture and food security worldwide. This means: every human being has the physical and economic access at all times to adequate food or means for its procurement.

Respect human rights of migrants and refugees

The EU should establish a regulatory framework to ensure safe, regular pathways for asylum-seekers and migrants to deliver on its 2030 Agenda commitments. Additionally, it should respect existing international Treaties and ensure that cooperation with non-EU countries on migration and displacement upholds all human rights. The EU should refrain from using Official Development Assistance (ODA) to pursue its interest of securing borders and managing migrant flows.

Question 1.2: For the policy areas that you have identified in Question 1.1, should the EU:

- carry on in delivering its reform agenda;
- allow those Member States who want to do more to move ahead without obliging all?;
- do more with all Member States
- do things more efficiently at the expense of doing less in other areas?
- other (please specify)

CONCORD supports the [6th scenario ‘Sustainable Europe for its citizens’](#). As the 2030 Agenda for Sustainable Development is a transformational agenda, it cannot be achieved by continuing business as usual. For the 5 priorities CONCORD listed above, we believe the following is what should be done

to be able to achieve the goals and targets:

Close the inequality gap

Global development will never be sustainable nor inclusive if people living in poverty or in vulnerability are left behind. The EU and all Member States together should:

- increase its effort for policy development on human rights-based social protection internally and in development cooperation, thereby adhering to the four pillars of the Decent Work Agenda – social dialogue, social protection, rights at work and employment – which are indispensable building blocks of sustainable development.¹
- step up the fight for tax justice by (1) increasing tax transparency through public country-by-country reporting and ending secret shell companies; (2) supporting developing countries in setting up structures and policies allowing them to raise sufficient taxes, including from multinational corporations, and expanding the tax base and developing transparent fiscal systems that ensure progressive collection and redistribution of revenues, as well as capacity building of tax administrations; (3) pushing for the establishment of an intergovernmental body on tax matters, to allow. The EU and its Member States should recognise the scale of tax avoidance and acting to end the scourge of tax havens and ensuring that those that run and exploit them are held to account.
- develop a plan to reduce extreme inequality and develop social and economic policy-making that factors in the impact on inequality both through international cooperation and through domestic policies such as by implementing the European Pillar of Social Rights.
- stand by their obligations under the Committee on the Rights of Persons with Disabilities, with regard to UNCRPD article 32 on international cooperation, adopt an harmonized policy on disability-inclusive development and establish a systematic approach to mainstream the rights of persons with disabilities in all European Union international cooperation policies and programmes, appoint disability focal points in related institutions and take the lead in the implementation of disability-inclusive Sustainable Development Goals.

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Care about our well-being, not only GDP

The EU and all its Member States should look to address far more comprehensively what constitutes progress for people and planet, and use the economy as one tool to achieve such progress. New indicators will be needed to measure inclusive, sustainable progress in the social, economic, governance and environmental domains, which should focus on the notion of the well-being of people and planet, in line with Article 3 TEU, which states that the social mission and objectives of the EU are to promote the well-being of its peoples.

Such indicators might include, for example, access to adequate food, shelter, good-quality basic services, a healthy life expectancy, income security, decent work, a good work-life balance, good relations in one's community, physical security and a clean and healthy environment. Similarly, other indicators, such as measures of greenhouse gas emissions, percentage of renewable energy in the mix or gender equality might also be considered.

Whatever the final choice, a "well-being index" must cover a wide range of issues of importance for people and planet, and will necessitate a combination of both qualitative and quantitative indicators. When proposing a common set of indicators covering social, economic, governance and environmental factors, the European Commission should draw on the work already going on in various EU Member States.

CONCORD's preliminary research shows that it would be extremely helpful if the variety of models

¹ International Labour Organization (2015), *Guidelines for a just transition towards environmentally sustainable economies and societies for all*, http://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_ent/documents/publication/wcms_432859.pdf

currently existing across EU Member States were harmonised and coordinated. The considerable differences between the indicators used makes comparison difficult. Since the aim is for the EU as a whole to adopt a series of indicators to make up an index which will increasingly complement, and ultimately replace, GDP as the measure of progress or of the “well-being” of a population, it is crucial that Member States come together – with the Commission – to determine a common set of quantitative and qualitative indicators to measure a broad and representative set of factors which underpin the well-being of people and planet. It is also critical for the EU as a whole to agree to embed the findings of such well-being indicators into decision-making processes, including budget-setting in the EU and nationally.

Help to achieve gender equality and empower women and girls worldwide

With the EU Gender Action Plan 2016-2020, the EU has made a great start to deliver on SDG commitments, but should do more to get all Member States on board, and to ensure that the GAP has a transformative impact on the lives of women and girls. As a basic step, involvement with local actors, in particular women’s rights organizations, is key.

Moreover, above and beyond the Gender Action Plan, the EU and all its Member States must do more to fulfill its other commitments at international level, for example the Beijing Declaration, the Istanbul Convention and UN Security Council Resolution 1325 on Women, Peace and Security. With clear benchmarks and timelines, accountability for implementation of these commitments could be greatly improved.

Build a fair and just food system

The EU and all its Member States should continue to work closely together in the areas of agriculture, trade and development, but should strengthen the interlinkages between these policies to increase policy coherence for sustainable development.

The European Commission’s Directorate General for Trade and Directorate General for International Cooperation and Development should make global value chains truly sustainable by jointly:

- Identifying, discussing and monitoring any tensions between global value chain policies and food security objectives, to ensure sustainable and inclusive local food security and food systems are protected and promoted;
- Developing sound criteria for upholding sustainability in global value chain initiatives in line with the right to food, water and land, such as those laid out in OECD guidelines and the Voluntary Guidelines on the Responsible Governance of Tenure Land Tenure; as well as indicators to monitor and report on this for any policies and initiatives related to global value chains;
- Formulating and implementing a holistic and cross-sectorial food and natural resource policy to promote sustainable and healthy food consumption choices in the EU and its Member States, and consequently promote a smaller global footprint.

The European Commission’s Directorate General for Agriculture and Rural Development and Directorate General for International Cooperation and Development should:

- Prioritise investments and research in local agro-ecological practices which contribute to more sustainable and robust food production systems and also mitigate the effects of climate change (for instance in efforts for Climate Smart Agriculture);
- Put the right to food at the centre of climate financing and investment policies in order to ensure support for small-scale farmers and implement the guidelines of FAO and the Committee on World Food Security on the right to food and governance of tenure

Respect human rights of migrants and refugees

This is an area where the EU should do things more efficiently at the expense of doing less in other areas. The current approach of seeking to externalise borders, stopping smuggling and using ODA to take away 'root causes of migration' are based on flawed premises. Migration is of human nature, smuggling cannot be stopped but gets more expensive and dangerous, and more development tends to lead in first instance to increased migration. Instead the focus should be on taking over the mobility market, by creating legal pathways to Europe, both for workers of all skills levels, and for asylum seekers, to share the responsibility with third countries.

Question 1.3: In both the domestic and external context, how can the EU increase policy coherence and minimise trade-offs?

Policy coherence for sustainable development

First and foremost, it is important that we strive for policy coherence for sustainable development, and not just for policy coherence in general, which is something very different. In order to ensure policy coherence for sustainable development (PCSD), all policy-makers in all fields should take the following questions into account when reviewing existing or developing new policies:

1. Does it balance the four dimensions of sustainable development (social, environmental, economic and governance)?
2. Does it have a positive or negative impact on the ability of EU Member States or other countries to achieve sustainable development?
3. Does it have consequences for future generations?

The EU and its Member States should regard PCSD as a binding requirement to assess the impact of EU policies (ex ante and ex post) on human rights, the four dimensions of sustainable development in developing countries, the reduction of poverty in all its dimensions and the eradication of extreme poverty. Additionally, it should take these assessments into account by rejecting any initiatives that clearly indicate detrimental impacts on the objectives listed above. This practice should be complemented by greater accountability through ensuring transparency and consultation with civil society and through improved redress mechanisms.

Impact assessments

The Better Regulation Package, adopted in 2015 by the European Commission, introduced a series of new and revised tools and procedures for decision-making. One such tool is the EU's ex-ante and ex-post impact assessments. Impact assessments are in principle a powerful tool for ensuring that the negative impacts of EU policies on sustainable development in general and on the sustainable development of developing countries more specifically are minimised, and their positive impacts maximised.

When focusing on the latter, [CONCORD's research](#) showed that, over the past few years, however, the European Commission's track record in using that tool to ensure policy coherence for development (PCD) has been poor. In 2015, the Commission revised its Impact Assessment Guidelines to incorporate clear guidance on how to take into account the impacts of its policies on human rights and sustainable development in developing countries. This has resulted in a higher number of PCD-compliant impact assessments: in 2016, 24% of the proposals relevant to developing countries were accompanied by an impact assessment that adequately examined the impacts on those countries. The year before, the proportion had only been 17%. This is to be welcomed. At the same time, however, it also means that in the vast majority of cases, still no attention is paid to impacts in developing countries. This is true for economic and environmental impacts, but seems to apply even more where human rights and social impacts are concerned. The Regulatory Scrutiny Board, an independent body

that checks the quality of draft impact assessments, has not played its role as a guardian of PCD: only in 10% of the cases in which it should have highlighted the lack of attention to impacts in developing countries did it actually do so.

Policy coherence for development is of paramount importance if we are to achieve the SDGs, and it makes an important contribution to the broader objective of policy coherence for sustainable development. Impact assessments and public consultations often seem to prioritise a policy's economic impact in Europe over its social, economic, environmental and governance impacts in partner countries. Impact assessments can be improved by taking into account the impacts on developing countries from the outset, by ensuring that they are underpinned by high-quality research, by weighing the different policy options carefully and by looking at power imbalances when considering the different interests at play.

Overall, CONCORD's research showed that impact assessments should be significantly improved. This can be done by taking into account the impacts on developing countries right from the start, by ensuring that the research underpinning the assessments is of a high standard, by weighing up the different policy options carefully and by balancing the different interests at play. Furthermore, it is important to draw a distinction between impacts on third countries and impacts on developing countries, in impact assessments where these might be different.

Concretely, CONCORD believes the Commission should:

- Put Policy Coherence for Development into practice by using the new Impact Assessment Guidelines and its tool for developing countries of the Better Regulation Package systematically and carefully. It should ensure that staff throughout the Commission have the expertise and capacity to raise PCD concerns and to formulate PCD-compliant proposals.
- Integrate the four dimensions of sustainable development (social, environmental, economic and governance) into its impact assessments and policy considerations. This would promote policy coherence for sustainable development, and would ensure that EU policies help to achieve the Sustainable Development Goals, both in Europe and globally.
- Make sure that, where an impact on developing countries is likely, it is taken into account from the very start of the policy-making process. It can do so by engaging the Directorate General for International Cooperation and Development early on. Civil society and affected communities should be consulted when proposals and impact assessments are being prepared.
- Safeguard the balance between business' interests on the one hand and the interests of impacted communities in developing countries on the other. If, after the different interests have been weighed up, it appears that the chosen policy option affects developing countries negatively, the Commission should see how those negative effects could be mitigated.
- Ensure its policies are based on evidence, and to this end, carry out impact assessments of different policy options, even when rapid responses are required.

In addition, CONCORD would like to stress the importance of assessments also assessing the impact of policies and programmes on men, women, girls and boys. While this has been committed under the EU Gender Action Plan, this is not systematically being implemented.

Role of EU delegations

In its [2015 PCD report](#), the Commission stated that – in follow-up to its 2013-2014 reporting exercise with EU delegations – it would strengthen the role of the delegations in PCD by (1) setting up a mechanism for regular reporting on PCD by delegations and encouraging them to engage in regular discussions on PCD issues with partner countries, while strengthening their dialogue and follow-up

with Member States; and (2) organising targeted training sessions on PCD for heads of cooperation when they meet in Brussels, as well as a PCD e-learning training course with a specific module devoted to the work in delegations.

CONCORD recommends that both the Commission and the EEAS staff in EU delegations worldwide should reach out more proactively to local groups of people whose rights are affected by EU policies, in order to engage in a dialogue with them, and that this should be closely monitored. CONCORD learnt from its survey in 2014 that only 30% of the respondents – CSO representatives from across the globe – had engaged with EU delegations on policy issues other than development aid, most of them because they had themselves proactively approached the EU delegation.² The PCD training for EU staff should give guidance on how to reach out to local stakeholders and how to deal with reports about serious human rights impacts by EU policies. The EU country roadmaps for engaging with civil society, the Human Rights Country Strategies and the Gender Action Plan also provide useful tools to build on.

Additionally, there should be more transparency about the feedback all EU delegation staff send to Brussels in their various reports, and about the analysis that is done at headquarters level, and how this feedback is taken forward. This feedback should also be discussed in more depth at the annual meetings of EU heads of delegation and of heads of cooperation.

Topic 2: Monitoring progress of SDGs

Monitoring progress towards the SDGs is key. The Commission is therefore committed to provide regular reporting of the EU's progress on the implementation of the 2030 Agenda based on a [reference indicator framework](#). Stakeholders have been consulted on the choice of indicators. The [first report](#) was published on 20 November 2018. The EU SDG indicator set will be regularly reviewed to take into account future policy developments and progress in the area of methodology, technology and access to data sources.

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Question 2.1: What possibilities do you see to complement and/or improve on the existing quantitative and qualitative assessment of progress toward the achievement of the SDGs, both at EU and MS level?

A robust monitoring, accountability and review framework

CONCORD repeats its call for a robust monitoring and accountability framework for the EU's implementation of the 2030 Agenda, which should consist of a comprehensive set of indicators, political and statistical progress reports, regular self-critical and participatory stocktaking sessions at both technical and political level, and inclusive and regular dialogue with stakeholders.

Therefore, we applaud the initiative taken by the EU to adopt a region-specific list of 100 relevant indicators for sustainable development in Europe, and by Eurostat to publish an annual statistical report to show progress - or the lack thereof - in achieving the Sustainable Development Goals. These measures complement the efforts taken in the UN context to measure progress at global level using a set of indicators common to all.

Despite these positive steps however, a monitoring, accountability and review system is not fully in place before a clear linkage with the policy making process is created. Currently, **the Eurostat progress report does not authoritatively directly inform any policy or decision making in the EU**. As such, the report risks becoming a mere curiosity instead of playing its important role in enabling evidence-based policy making and communicating progress to EU citizens.

The EU Member States are already providing encouraging examples to this end. Some have already taken steps to set up monitoring systems, which make such a link, and thus allows leaders to take

² CONCORD (Jan 2015). Mutual engagement between EU delegations and civil society organisations. Lessons from the field, <http://concordeurope.org/2015/01/26/the-eu-delegations-watch-report-2015/>

informed decisions to advance sustainable development in their countries. Such systems feed the regular indicator data directly into parliament committees policy and planning cycles, and budgetary processes.

Thus, the EU should consider how to build its own monitoring, accountability and review framework, which would also include political progress reports and stock-taking moments, and allow for inclusive and regular dialogue with stakeholders.

As recommendations to improve the reporting exercise, we suggest that:

- The Eurostat report will be presented to the European Parliament for a plenary debate open to other stakeholders
- The European Commission will analyse the document in dialogue with the high-level Multi-stakeholder Platform for Implementing the SDGs in the EU, to gather recommendations for improving the implementation of the 2030 Agenda in the EU.
- The 2030 Agenda indicators and monitoring data is taken into account and adopted in the big EU policy processes, including the Europe 2030 strategy, and the indicators used as a reference in the annual State of the Union speech.
- A timeline for a transparent process for reviewing the list of 100 indicators in dialogue with stakeholders will be published.
- Eurostat engages with stakeholders in interpreting the indicator data before publishing the reports, or that the indicators are published for open consultation for different stakeholders to provide their own analysis or interpretation.
- Eurostat to build on the work of measuring external effects and spillovers as in the Bertelsmann Stiftung's SDG index.
- Strengthen a human rights-based perspective in all indicators including women and children's rights.

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The EU SDG indicator set

The impact of EU policies on sustainable development globally is missing in the adopted EU SDG indicators list and recent Eurostat progress report. Data are not consistently disaggregated to allow us to check whether no one is being left behind, especially the most marginalised and/or vulnerable groups. While the Eurostat report provides a first snapshot of how the EU has progressed – between 2005 and 2015 - towards the Sustainable Development Goals internally, it **fails to acknowledge the important role the EU plays globally** (first donor, first trade power, etc.).

Despite the recently adopted European Consensus on Development and the EU's Treaty obligation to take into account the objectives of development cooperation in all its policies likely to affect developing countries, the Eurostat report limits itself to assessing - surprisingly in an optimistic manner - the amount of **Official Development Assistance (ODA)** that has been disbursed.

In order to provide a comprehensive image of the EU's contribution to the SDGs and ensure policy effectiveness and coherence, this indicator should disaggregate data by SDG-sector and recipient country, in line with the global SDG indicator 10.b.1. The EU should consistently monitor how its policies – be those internal or external – advance the SDG Agenda, as other European countries (e.g. [Germany](#)) do.

The current indicator on ODA does not assess to what extent the EU's development efforts, in key areas such as of gender equality, health, food security or education, were able to reduce poverty and inequality, and make a positive contribution to sustainable development of partner countries. Moreover, [OECD has observed a worrying trend](#) that despite that the development aid rises again in 2016 flows to poorest countries dipped. This goes directly against 10.B.



Several important targets have been completely overlooked as the EU did not have indicators readily available to measure them or were not meaningfully quantifiable. Often no indicators have been included in the EU SDG indicator set because there was no readily available indicator to measure this target. Not because it was perceived unimportant. Eurostat should plan to build their own capacity and the capacity of national statistical offices to be able to monitor also those areas. CONCORD offers to elaborate jointly with Eurostat meaningful indicators for the areas it currently falls short but which CONCORD has expertise on. Eurostat should also integrate citizens-generated data in their report when it meets certain quality requirements.

The EU does not mention its contribution to **gender equality and women's empowerment worldwide**, despite the recently adopted Gender Action Plan II 2016-2020 which has been listed in its [2016 mapping exercise](#) of EU initiatives contributing to the achievement of the SDGs, SDG 3 and SDG 5 in particular. It is alarming that the current EU-SDG indicator list does not include any indicator related to violence against women or sexual and reproductive health and rights.

In that same mapping, the EU explained as well how its coherent set of development policies defining the scope of EU action on food and nutrition security, namely the 2010 EU Food Security Policy Framework, the 2012 Communication on Resilience and the 2013 Communication on Nutrition, together with its human development actions to tackle hunger, notably on malnutrition and on ensuring sustainable and climate-resilient agriculture, contributes to reaching **goal 2 to end hunger, achieve food security and improved nutrition, and promote sustainable agriculture**. But under goal 2, there is no indicator or qualitative reflection on these EU efforts to achieve goal 2 globally.

With regard to **reducing inequality within and between countries, SDG 10**, some important parts currently missing should be added in future assessments. In particular the following points:

- Domestic resource mobilisation and the impact of tax policies on inequality for example (either for developing countries (PCD) or within the EU).
- With regard to migration, the report mentions that in 2016, 710 635 people received a positive decision granting protection status, yet acknowledges a decrease of first-time applicants of 50 910 in comparison with the year before, due to the closing of the Western Balkans route and the EU-Turkey Statement, which have made the irregular flow of people towards central and northern Europe more difficult and has forced migrants to use different routes across the Mediterranean. But apart from closing pathways, the report does not explain how the EU has helped facilitating safe, orderly and regular migration (target 10.7) and the reduction of transaction costs of migrant remittances (target 10.c)
- In the area of regulating the global financial markets (target 10.5) to improve regulation and monitoring of global financial markets and institutions and strengthen implementation of such regulations.
- 10.6 ensure enhanced representation and voice of developing countries in decision making in global international economic and financial institutions in order to deliver more effective, credible, accountable and legitimate institutions.

Given the importance of **targets 4.7 and 12.8 which relate to global citizenship education**, we urge the EU to develop a proper indicator that would allow us to track progress in this regard. But when looking at the proposals put forward by UNESCO for target 4.7, we would like to call for an indicator not only measuring data from schools, so formal education, but also capturing the non-formal/informal education sector. To this end, we propose the following wording for such an indicator: 'Extent to which (i) global citizenship education and (ii) education for sustainable development, and the Sustainable Development Goals, including gender equality and human rights, is mainstreamed in curriculum in non-formal education and is taken up by people (measured by gender, age, geography, sector) through policy, curricula, education, and training, and learner assessment.' We regret that no

greater efforts have been made by UNESCO/Global Citizenship Education organisations and others at the global level to try to create an indicator to address this gap particularly when the role of non-formal education is continually referred to in UNESCO/GCE documents and at their events. The EU and its Member States could also support the [OECD PISA Global competencies framework](#) which should be a tool to assess progress in SDG 4.7 globally and the user statistics in public libraries, to assess the implementation of lifelong learning.

CONCORD wants the EU to report on its progress towards **Policy Coherence for Sustainable Development (target 17.14)** and this in a more meaningful way than by counting the number of countries with mechanisms in place to enhance policy coherence of sustainable development as was proposed by the Inter-agency expert group on SDGs. CONCORD would be keen to work together with the Commission to jointly elaborate the best possible measure of progress for target 17.14. This should build on the work currently undertaken by the [PCSD Partnership – A multi-stakeholder Partnership for Enhancing Policy Coherence for Sustainable Development](#).

In order to encourage and promote effective public, public- private, and civil society partnerships, **(target 17.17)**, the EU and its Member States must contribute - both externally and internally - to the **enabling environment of civil society** and the protection of human rights. It is also important that EU internal and external action is coherent, so if civic space is endangered in a Member State, the EU must react with commitment and adequate instruments in its internal action to defend and uphold the rights to freedom of expression, peaceful assembly and association as well as the rule of law within the union. Two important sources of data are the [Civicus Monitor](#) or the [ICNL Civic Freedom monitor](#).

To be able to track progress towards **target 17.19 ‘by 2030, build on existing initiatives to develop measurements of progress on sustainable development that complement GDP, and support statistical capacity building in developing countries’** we propose the following indicator: “Number of EU Member States which have adopted measures of progress based on well-being, that are published annually as a legal requirement, reflect the four dimensions of sustainable development [social, environmental, economic and governance] and that are used in policy- and decision-making.”

The Eurostat progress report 2017

CONCORD regrets the absence of a holistic and integrated analysis. If we only look at progress SDG by SDG as the report does, it undermines the indivisible and interlinked nature of the objectives. It also only pays lip service to the notion of Policy Coherence for Sustainable Development(PCSD) but fails to analyse how the 2030 Agenda is supposed to question the way public policies are driven especially in respect of PCSD. [The SDG-index](#) of national progress from the Bertelsmann Stiftung methodology, includes a relevant methodology and measures “spillover effects” for example, high levels of consumption, the existence of tax havens, or the export of arms.

Overall, the Eurostat report presents a fairly positive analysis stating that, over the last five years, the EU made moderate or significant progress towards all 17 SDGs. CONCORD has analysed specific parts of the Eurostat report relating to food security and agriculture, ODA and financing for development, inequality, gender equality, sustainable production and consumption, migration, trade, inequality, policy coherence for sustainable development, global citizenship education, and genuine measure of progress. In many of these areas, the choice of indicators (or absence of relevant indicators), the lack of analysis of the external dimension and impacts of EU action as mentioned above and ways of reporting paint a misleading picture of the EU’s performance on the SDGs.

On **SDG 1 (poverty)**, Eurostat assesses moderate progress in the two sub-themes ‘multidimensional poverty’ and ‘basic needs’. The indicators used, however, are based on relative poverty and severe

material deprivation, and therefore omit many realities of poverty, such as homelessness in EU countries.

On **SDG 2 (zero hunger)**, Eurostat reports moderate progress. Praising the increase in the area under organic farming and some progress in relation to the adverse impacts of agricultural production, the report fails to recognize the EU's agricultural policy impact on sustainable development globally. For example the mass scale of soy and palm oil in other regions with negative social and environmental effects.³ Furthermore, the combination of the CAP subsidies with strong EU trade defence instruments and market access to third countries under EU free trade agreements creates unfair competition for small scale food producers in developing countries, who represent a majority of the world's poor.⁴

On **SDG 3 (health)**, Eurostat assesses progress in the four sub-themes 'healthy lives', "health determinants", "causes of death" and "access to healthcare" but fails to capture the EU's contribution to the research and development of new affordable, accessible and efficient health solutions supported with public funding. The EU supports global efforts in this field and thus, it should include indicators to measure its contribution to eradicate poverty-related and neglected diseases. As per the global perspective, [Eurostat](#) recognizes that the main prerequisites for meeting the SDG 3 are "universal health coverage; access to sexual and reproductive health-care services and to safe, affordable and effective medicines and vaccines for all", thus it should capture the EU's contribution to reduce health inequalities measuring progress towards these targets.

On **SDG 4 (quality education)**, the report recognizes that the EU does not seem to be on track to meet its 2020 benchmarks for the employment rate of recent graduates and adult participation in learning. The indicators present a narrow picture of education that fails to recognize non-formal learning and Global Citizenship Education that could also have a positive spillover effect on other SDGs.

On **SDG 5 (gender equality)**, Eurostat reports an increase in balanced participation of women and men in formal education, in the labour market and in decision-making processes. The positive trends mask that EU countries are still far from meeting gender equality in these areas. Further, the report fails to report on the external dimension (due to the lack of disaggregated data by age or gender) and the need for commitments to gender budgeting.

On **SDG 10 (reduced inequalities)**, Eurostat contrasts a positive trend for inequality between countries with a negative trend for inequalities within countries. The analysis presented contains an odd set of indicators mixing income inequality, financing for development and migration issues, while completely omitting tax avoidance and evasion or illicit financial flows. A failure to include disaggregated data based on income, sex, age, disability, race, class, ethnicity, religion makes it impossible to evaluate the state of inequalities in all its dimensions in EU countries. The report, however, recognizes that the ever-widening gap between the rich and the poor is a matter of concern. It is important to note that SDG 17.18 state the need for support for capacity building in low income countries to increase significantly the availability of high-quality, timely and reliable data disaggregated by income, gender, age, race, ethnicity, migratory status, disability, geographic location and other characteristics relevant in national contexts.

On **SDG 12 (sustainable production and consumption)**, significant progress has been made according to the Eurostat report. The report does not recognize that emissions have been 'outsourced' to other countries outside the EU. With consumption, rather than production, taken as a yardstick, [research](#) finds that achievements in decoupling in advanced economies are smaller than reported or even non-existent. Assessments from the [Sustainable Development Solutions Network \(SDSN\)](#) and the [European Environmental Agency \(EEA\)](#) clearly show that sustainable consumption and production is where high-income countries, including the EU, fail. For example, if everyone lived like an EU citizen we would

³ <https://concordeurope.org/2012/03/07/eu-farm-policy-must-stop-negative-impact-on-developing-countries/>

⁴ <https://static1.squarespace.com/static/589b021a893fc0bb3ba1f242/t/59030973b8a79b84ec14e1f7/1493371262158/CONCORD+Reply+to+Consultation+on+CAP+modernisation.pdf>

require the resources of 2.6 planets. Between 1990 and 2008 an area of global tropical forest the size of Portugal vanished to produce commodities for the EU, like palm oil, soy and beef. The Eurostat monitoring report does not cover these important aspects which undermine the credibility of claims of a sustainable Europe.

On **SDG 16 (peace, justice and strong institutions)**, Eurostat notes that the EU is one of the most successful peace projects in the world. The report, however, notes that trends in this area cannot be calculated due to insufficient data over the past five years. Indicators used for justice and quality of legal systems are insufficient in itself. More appropriate data could be used such as those from the [Commission Communication in April 2017 on access to justice in environmental matters](#). It recognizes that “individuals and NGOs are adversely affected by obstacles to access in national courts”. Indicators could also refer to [European Union Agency for fundamental rights \(FRA\) report on access to remedy in the field of business and human rights](#). FRA’s findings from research in related areas suggest that more could be done to ensure effective access to remedy for business-related human rights abuse within the EU. Again, insufficient data disaggregation makes it impossible to determine developments in which particular groups, such as young people or women, are able to access their rights.

On **SDG 17 (partnerships for the goals)**, Eurostat notes an increase in Official Development Assistance over the past 15 years as well as EU financing to developing countries. The report ignores financial flows from developing countries to EU countries, such as illicit financial flows (some experts estimate that up to 800 billion EUR come out illicitly of South countries annually, whereas ODA from OECD countries altogether stands at 140 billion USD). Furthermore, it does not mention that in 2016, the spending costs for migrants, refugees and securitisation, all reported as ODA, increased by 43 % compared to 2015. This type of spending, also known as inflated aid, either never leaves the EU and is spent in-house or illustrates the conditions imposed by the EU on third countries. With only genuine aid being accounted, [CONCORD calculates](#) that it would take the EU and its Member States another 30 years to reach their commitment to 0.7% of GNI to ODA. Furthermore, the report seems to ignore that the 0.7% ODA/GNI target was postponed from 2015 by an additional 15 year at the Addis Ababa Action Agenda conference. Also, it is not focusing on real outflows contrary to what CONCORD does; from that perspective, the AidWatch report came to the conclusion that the real 0.7% target will be reached no sooner than 2052.

Question 2.2: How should the external impact of internal EU decisions be measured and accounted for?

Given how essential PCSD is for achieving sustainable development, special attention should be paid to how it is being integrated in monitoring, accountability and review frameworks at national and EU level. The single global indicator for Target 17.14 currently stands as “number of countries with mechanisms in place to enhance policy coherence for sustainable development”. This is at the same time both very vague and too narrow, and does not allow for adequate monitoring on policy coherence for sustainable development.

PCSD monitoring should be more extensive and should adopt a range of different approaches. It should involve statistical data illustrating how, for example, the EU has succeeded in decoupling its own sustainable development from the negative impacts in third countries, or from global challenges such as climate change. Or whether EU agriculture and trade policies have resulted in less dumping of EU agricultural products on developing countries, or its total elimination. This kind of statistical analysis should be complemented by a qualitative analysis of the use of PCSD mechanisms, or of impacts on human rights. Civil society can play a crucial role here by raising the voices of rights holders, especially from among the most marginalised groups.

Reporting on Policy Coherence for Development (PCD) has so far tended to emphasise mechanisms

that are already in place – especially coordination mechanisms, as they have appeared to be the most common. This is far from sufficient. Any reporting that presents progress on PCSD also needs to look into the actual impacts of policies and into how these mechanisms have been used. It is one thing to have a mechanism in place, but is there any evidence that it has led to better, more coherent policy making? Has any policy actually been changed because of these mechanisms?

CONCORD would like to see the EU – and Member States too – rigorously monitoring its PCSD performance, in combination with its performance on the 2030 Agenda overall. A systematic listing is needed of all policies – both domestic and external – that have an external impact. This PCSD monitoring could be an annual exercise, along with the annual Eurostat report on sustainable development. Systematic follow-up of ex-ante impact assessments and ex-post evaluations should be included in the monitoring. One interesting example of measuring international spillovers can be found in Bertelsmann's '[SDG Index and Dashboards Report 2017](#)' (see page 9).

Another recommendation is that the EU should be more transparent in its handling of conflicts of interests and incoherencies, in both the policy design and policy implementation phases. This will enable the parliament and external stakeholders – amongst them NGOs and other civil society organisations – to play their role more meaningfully in holding the Commission to account for respecting the principle of PCSD when implementing the SDGs.

Question 2.3: How can each stakeholder (governments, local administrations; companies, investors, education institutions; civil society) improve the quality of information it provides concerning the implementation of the SDGs?

The EU often claims to be a global leader in sustainable development. Is this the case or plain lip service? The EU should ensure accountability and transparency to its citizens by reporting regularly on its progress towards sustainable development. The EU should also develop more meaningful ways of engaging with citizens and civil society while collecting feedback and designing new policies.

All the aforementioned stakeholders (governments, local administrations, companies, investors, education institutions and civil society) should work on three different levels:

- Increase coherence: by practicing what they preach;
- Promote coherence: by increasing the outreach of the impact of their activities and/or policies on sustainable development. This can be done by relating each activity or policy to the SDG those are impacting by having visuals, logo or other clear tool in any communication report, action and/or campaign;
- Engage citizens and community: all the above mentioned stakeholders have to play a catalytic role in engaging communities and citizens increasing individual commitment to the SDGs. To do so they have to work in close synergies with CSOs and Educational institution and to support financially and politically Education for SDGs and the inclusion of GCE in the school curricula to raise up in 12 years a more conscious and informed generation.

Civil society

The **Development Education and Awareness Raising (DEAR) and Global Citizenship Education** sector of European civil society has taken into its core business to address SDGs on a practical level, bringing understanding and knowledge of sustainability into formal, non-formal and informal education and lifelong learning, thus allowing every European to contribute into achieving SDGs by personal contributions. Awareness Raising and Advocacy Campaigns toward global justice are contributing to the SDGs in many ways and many different sectors (e.g. global supply chains of food or garment) especially to SDG 8 Decent work and 12 sustainable consumption and production.

Also civil society needs to play its part and make use of its experience in working with the International Aid Transparency Initiative (IATI), drawing lessons to develop a similar initiative for SDG reporting. The Istanbul Principles for CSO Development Effectiveness continue to guide the work of civil society worldwide.

Companies

How can the **private sector**, understood as organisations engaging in profit-seeking activities, contribute to realising the 2030 Agenda for Sustainable Development globally? In different ways, the private sector has already led many voluntary initiatives which contribute to sustainable development. However, to realise our collective transition towards a system that offers people worldwide a dignified life and respects our planet, both companies and governments must take further action. The EU and its Member States should create an environment that maximises the potential of the wide range of private sector actors to contribute to the implementation of Agenda 2030. To this end, CONCORD proposes a [ten-point roadmap](#) that needs to be considered seriously and will require concerted action if the EU wants to play its full part by 2030. There are two important areas in which more qualitative information from (multinational) companies can contribute significantly to the implementation of the SDGs: through public country-by-country reporting of their payments to governments and carry out due diligence throughout their supply chain to ensure they respect human rights.

A major contribution of the private sector to development is through taxes paid in developing countries – a crucial source of funding for gender-responsive public services. Corporate taxes are an important contribution to national budgets and developing countries on average rely on them more than OECD countries do, where this kind of tax makes up for a smaller share of the overall tax revenue. The global problem of corporate tax avoidance affects developing countries particularly strongly. When combined with international tax standards which favour richer countries in the division of taxing rights, and irresponsible use of tax incentives, these cost developing countries more than US\$100 billion in estimated lost revenue every year. Drivers of the problem go well beyond national tax policies of developing countries and relate to international tax standards and tax policies of high-income countries. The EU and Member States' taxation policies must not undermine and, where possible, should support developing countries' fight against corporate tax avoidance. EU policies promoting a greater role for private companies in developing countries (development, trade and investment policies) should also translate into greater domestic resource mobilisation. To increase tax transparency, obligations in the extractives and banking sectors should be expanded to all sectors through the introduction of a public country-by-country reporting (CBCR) requirement with no exceptions, requiring all multinational enterprises to report on their payments to governments.

The UN Guiding Principles (UNGPs) have put forward human rights due diligence (HRDD) as the principal tool that business enterprises should use to identify the potential and existing human rights and environmental risks related to their activities and business relationships, and to set out the necessary steps for prevention and accountability. Human rights due diligence should be implemented by all companies, no matter what sector or size – although what due diligence means in practice of course depends on the size, sector and context. In general, human rights due diligence is “an ongoing risk management process that a reasonable and prudent company needs to follow in order to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. It includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed. The UN Guiding Principles Reporting Framework provides comprehensive guidance for companies to report on how they respect human rights and thereby contribute to sustainable development. Because for business to realize its full contribution to sustainable development, it must put efforts to advance respect for human rights at the heart of its strategy. CONCORD therefore demands that the application of the UNGPs are

mandatory for companies involved in EU programmes.

There are an increasing number of initiatives to improve SDG reporting for companies. The [GRI Sustainability Reporting Standards](#) for example help businesses and governments worldwide understand and communicate their impact on critical sustainability issues such as climate change, human rights, governance and social well-being.

Topic 3: Implementing SDGs

Achieving the SDGs is a shared responsibility. Yet, there are still many citizens and stakeholders in the EU who do not know what the SDGs are, resist them or are unaware of their importance.

Question 3.1: What further measures could be taken by the EU to make the process of implementing the SDGs more inclusive and participatory?

The vital role that civil society has in the implementation of the 2030 Agenda is recognised in the text of the 2030 Agenda itself. If the Goals of the Agenda are to be realised, change must happen at a local level and will depend to a great extent on local action. Local voices calling for transformative change are therefore crucial. Despite notable achievements in civil society's ability to engage in global processes, on the ground CSOs face many difficulties in participating in national and local decision-making processes, or in highlighting irregularities in such processes or decisions. The 'shrinking space' for critical voices – whether civil society actors, the general public or even well-known public figures – in many countries has meant that it is increasingly risky to speak out on human rights and environmental issues. This has considerably constrained the work of CSOs and will inevitably limit the achievement of the 2030 Agenda.

- The EU must acknowledge the important role of civil society for the implementation of the 2030 Agenda and should vigorously support an enabling environment for civil society, including for children's, youth and women's groups.
- The Commission should ensure full transparency about its internal inter-service dialogue and dialogue with the Multi-stakeholder Platform. Civil society, beyond the Multi-stakeholder Platform, and especially from sectors that are not represented in the Platform, such as disability, children and elderly, should be able to feed into the development of the reflection paper and subsequent long-term implementation strategy.
- The EU should ensure to involve civil society well in advance in the preparations, presentation and follow-up of its report during the 2019 High-level Political Forum.
- The EU should include how it plans to engage with civil society in the implementation of its long-term strategy to implement Agenda 2030, which should be politically enshrined to ensure it remains valid over the coming legislative periods up to 2030.
- Every year, a plenary debate should be organised in the European Parliament about the progress of the EU to achieve the 2030 Agenda, on the basis of the Eurostat progress report and other more qualitative progress assessments.

The EU must, in all internal and international foras, take stand for the need for all civil and political rights to be respected - including for information to be freely available to the public – and for the government and local authorities to consult with people on decisions which concern their lives. The EU should increase its financial support to local civil society in its own rights. Of particular note in this regard is the EIDHR as it does not require any partner government approval for its implementation. However, the amounts of money available to such instruments are tiny in comparison with the need. They therefore need to be prioritised and reinforced.

Question 3.2: What actions could be taken to improve the planning and implementation of the SDGs at local, regional and national level?

National, regional and local governments (as well as EU institutions) should undertake the following actions to improve the implementation of the 2030 Agenda for Sustainable Development:

- Appoint **political leaders** that have the **power and political will** to guide the whole-of-government approach to drive this holistic Agenda forward.
- Set up a **structured and clear governmental process** to implement the 2030 Agenda, involving different ministries.
- Parliaments should set up a **structured and clear parliamentary process** to engage in the implementation and monitoring of the 2030 Agenda, involving different political parties and parliamentary committees.
- Step up efforts to **localise the 2030 Agenda** and involve also regions, provinces, cities or communes.
- Carry out an **honest and thorough gap analysis**, identifying clearly what is still missing to fully implement the 2030 Agenda and where contradictions between policies exist
- Adopt a **sustainable development strategy and implementation plan** to deliver on the 2030 Agenda, covering both domestic and international policies.
- Make sure such as strategy takes into account the **four dimensions of sustainable development, and key principles** such as leave no one behind and the respect of planetary boundaries.
- Provide the **financial resources** for the implementation of the 2030 Agenda and align monitoring and reporting timelines with government policy and budget design and planning cycles.
- Put in place new mechanisms to strengthen **Policy Coherence for Sustainable Development** and strengthen existing ones.
- Set up a **robust monitoring, accountability and review framework** to take the 2030 Agenda forward and which includes the following elements:
 - A **comprehensive national indicator set** to monitor progress towards the SDGs, in line with the globally agreed set of indicators but tailored to the national or EU context and developed in an inclusive and participatory way;
 - **Accessible, reliable and disaggregated data**, identifying SDG data gaps on the invisible population groups and the related need for investments in statistical capacity and research;
 - **Regular qualitative and quantitative progress reports**, developed in an inclusive and transparent way;
 - **Regular stock-taking moments** to review progress with all stakeholders involved (including the various ministries, the parliament and civil society) and to influence the next steps.
 - Ensure **public access to all relevant information** regarding the implementation of the 2030 Agenda in an easy and transparent way.
- Ensure a **structured participation process for civil society to engage** in the implementation and monitoring of the 2030 Agenda. Not only during the preparation of Voluntary National Reviews to the High-level Political Forum in New York, but permanently and continuously, as an actor in its own right. This should happen both sectorally and cross-sectorally to make sure we mainstream the goals and look at the interlinkages.
- **Support the creation of SDG multi-stakeholders platforms** to mobilise actors and resources towards SDG implementation and monitoring as a means to ensure the success of the 2030 Agenda.

- **Clarify who is doing what** and share this information in a dedicated website where citizens can find all relevant information and get involved.

In support of this, CONCORD calls on:

- The **General Affairs Council** to include sustainable development regularly in its meeting agenda to hold First Vice President to account, and the 2030 Agenda for Sustainable Development Working Party to regularly meet to discuss progress and exchange views and experience, while mainstreaming the 2030 Agenda in all the other working parties.
- The **European Commission**, to develop an EU Sustainable Development Strategy and concrete action plans for the EU institutions and Member States, respecting the exclusive, shared and supportive competences of the EU.
- The **European Parliament** to organise debates related to the 2030 Agenda in all its committees and to set up a group of dedicated Members of the European Parliament, representing a wide spectrum of committees and political parties, in order to hold EU leaders to account.

Topic 4: Open Question

Question 4: What would you/your organisation expect the Reflection Paper “Towards a sustainable Europe by 2030” to focus on and cover? Thinking in post-2020 perspective, which are the major changes that should be undertaken at the EU level in order to achieve SDG-s in the EU and globally?

Rethinking the current dominant unsustainable economic growth model

Concrete initiatives to re-think and reform the current unsustainable growth model and make sure, that the economic growth is socially inclusive and environmentally sustainable. This is linked to reforming the current production patterns. Europeans use natural resources over 4 times more than is sustainable. Green technology & innovations provide only a partial resolution to the over-consumption.

One important step to reform the current unsustainable growth model would be develop and use better measures and indicators of wealth and progress. GDP/GNI have considerable shortcomings in terms of sustainable growth. A proper lead indicator should at least represent the natural capital accounts to reflect the actual wealth of society.

The EU should work more ambitiously to go beyond GDP and set up a commission to develop genuine measures of progress, that could be applied on EU-level and globally.

EU governance for sustainable development

The reflection paper should also look at the governance of future Commissions to be able to deliver on this ambitious agenda by 2030. The current Vice-President system can contribute to sustainable development should it balance better the different dimensions of sustainable development, whereby one dimensions is not subordinated to another) and there is a clearer cooperation between the external and internal policies of the EU. Also the choices for staffing within each DG and cabinet should allow for a better mainstreaming of sustainable development. The institutional reform debate provides an opportunity to get this right for future Commissions.

CONCORD

European NGO confederation for relief and development

