NIDOS

Policy Coherence for Development:

Exploring and Learning from European PCD Approaches

November 2014

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NIDOS is the Network for International Development Organisations in Scotland. NIDOS unites Scotland's international development sector to promote effectiveness and collectively influence the policy agenda. Our aim is to strengthen the contribution of Scottish organisations to reducing inequality and poverty worldwide. Our network has a uniquely global reach, with over 110 members working in at least 142 countries and across a wide range of specialisms.

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Contents

Acknowledgements

Acronyms

BNC	Working Group for the Assessment of new Commission Proposals [Netherlands]
CID	Committee for Development Cooperation [Luxembourg]
CNCD-11.11.11	Centre national de coopération au développement [Belgium]
DAC	Development Assistance Committee
DGIS	Directorate-General for Development Cooperation [Netherlands]
DPC	Development Policy Committee [Finland]
ECDPM	European Centre for Development Policy Management
EU	European Union
ICEI	Instituto Complutense de Estudios Internacionales
MDGs	Millennium Development Goals
MEE	Ministry of Employment and the Economy [Finland]
MFA	Ministry for Foreign Affairs [Finland]
MFA	Ministry for Foreign Affairs [Sweden]
MOF	Ministry of Finance [Finland]
MOI	Ministry of the Interior [Finland]
NGOs	Non-governmental Organisations
NGDOs	Non-governmental Development Organisations
ODA	Overseas Development Assistance
OECD	Organisation for Economic Cooperation and Development
PCD	Policy Coherence for Development
PCU	Policy Coherence Unit [Netherlands]
PGD/PGU	Policy for Global Development [Sweden]
TRIPs	Trade-Related Intellectual Property
UN	United Nations
UNDP	United Nations Development Programme

Executive Summary

The EU, OECD and UN have all set out commitments to Policy Coherence for Development (PCD), the principle that all government departments and policies should act coherently to comply with, and contribute to, the goal of an equitable and sustainable global development.

Building on NIDOS' report on Scotland's Place in Building a Just World and support for PCD across the Scottish political spectrum, this report explores how six other European countries have implemented PCD and how civil society in each of these countries has engaged in the process, through research and conversations with civil society representatives. The result is a series of findings and recommendations setting out how best to implement PCD.

PCD Approaches in other European Countries

Examining the path of PCD in Belgium, Denmark, Finland, Luxembourg, the Netherlands and Sweden highlights PCD approaches going back over a decade, lessons learnt, ongoing challenges and current practices.

In **Belgium**, policies and measures to implement PCD go back to the early 2000s but were limited in scope and effectiveness. Learning from this, a new law was passed in 2013 introducing stronger mechanisms and structures for implementing, delivering and assessing PCD, including an Inter-Ministerial Conference, Interdepartmental Committee, Advisory Council and system of impact assessments. As of 2014, many of the mechanisms have yet to be introduced and there are questions over the commitment of the new government to PCD.

In **Denmark**, there have been positive statements of PCD since 2004. A new action plan in 2014 introduced more concrete measures, including annual reporting, the embedding of PCD within a parliamentary committee, setting

goals, and screening policies for PCD implications. However, this and previous commitments only refer to EU not domestic policies.

In **Finland**, commitments to PCD go back to 2001 and were strengthened during the Finnish Presidency of the EU in 2006. Finland has an inter-ministerial network for awareness raising and exchanging information on PCD, a Development Policy Committee (DPC) which reviews progress on PCD, reference to PCD in annual reports on Development Cooperation, and they have conducted a PCD pilot on food security. 2014 also marked the first ever government report on PCD, though it is not clear whether this will be repeated.

In **Luxembourg**, references to PCD go back to the 1990s though it has only been since 2012 that any real progress has taken place. Explicit reference to PCD in 2012 legislation led to the Inter-Ministerial Committee for Development Cooperation (CID) covering PCD, inclusion of PCD in the annual report, a debate on Development Cooperation in parliament and a focus on thematic issues in relation to PCD.

The **Netherlands** was one of the first countries to adopt PCD, introducing a Policy Coherence Unit to input into decision-making as far back as 2002. An interdepartmental committee, with representatives from every government ministry, is responsible for considering PCD for all EU legislation. More recently there have been two PCD case studies on the impacts of policies on Ghana & Bangladesh.

Sweden is lauded as a world leader on PCD, discussing it as far back as 1999 and, in 2003, introducing the world's first ever legislation on PCD, the Policy for Global Development (PGD). It has a Unit for Development Cooperation Governance that coordinates between ministries; inter-ministerial working groups; biennial government reports to parliament on PCD; and a focus on six thematic issues against which progress is assessed.

Civil society engagement in PCD

To assist NIDOS' work on PCD, PCD engagement by civil society in Belgium, Finland, Luxembourg, the Netherlands and Sweden was explored through conversations with representatives of NGO platforms in each of these countries.

In **Belgium**, NGO platforms have played a major role in implementing PCD, taking part in official working groups and meetings. Beyond these fora, they have focused engagement on specific issues, both with member organisations and politicians, through one-to-one and roundtable meetings.

In **Finland**, NGO platforms are represented on the PCD advisory body and have long called for more government action. They engage members through thematic working groups and have sought political commitments in advance of elections.

In **Luxembourg**, NGO platforms have been instrumental in progressing PCD, taking part in consultations through an NGO policy forum, seeking political commitments prior to elections and producing their own PCD reports. They have also learnt that they need to seek support for PCD at the highest political level.

In the **Netherlands**, there is little formal engagement with civil society by Government but NGO platforms continue to push for progress through lobbying, their own PCD working group and their own PCD reports.

In **Sweden**, the NGO platforms' own Barometer PCD report has been crucial in progressing PCD. While engagement with government has been informal, they too have a PCD working group for members as well as thematic groups and have called for political commitments in advance of elections, targeting not just development spokespeople.

Recommendations for implementing PCD

The key findings and recommendations of the report for implementing PCD include:

- A strong legal, or at least policy, commitment to PCD to prevent loss of support if and when governments change
- A clear definition of PCD that makes it relevant to national and EU policies to avoid confusion
- The involvement of all ministries and leadership from the highest level to aid arbitration and to prevent it becoming a 'development' issue
- The involvement of southern partners to ensure credibility and measure impacts
- The identification of thematic issues to focus PCD work
- Annual or biennial government reporting on PCD with scrutiny by parliament and civil society to ensure transparency
- A strong role for civil society built in to mechanisms to ensure accountability and information exchange
- Appropriate funding committed to ensure a PCD system can operate effectively.

Recommendations for civil society engagement in PCD

The key findings and recommendations of the report for civil society engagement in PCD include:

- Focusing on thematic issues to make PCD relevant to members and decision-makers
- Referencing PCD in all work and events
- Establishing a working group for engaged member organisations to take forward work on PCD
- Use upcoming elections to secure commitments to PCD from political parties
- Produce civil society reports on PCD progress to hold government to account
- Develop positive formal and informal working relationships with government to share expertise and information.

1. Introduction

The awareness that all government policies, not just those on development, of a country, or group of countries, will have an impact on the development of other countries has long been referenced in international treaties and agreements. This has given rise to the concept of Policy Coherence for Development (PCD), that being all government departments and policies should act coherently to comply with, and contribute to, the goal of an equitable and sustainable global development.

As far back as 1992, the Maastricht Treaty on the European Union (EU) stated, in article 130v, that, 'The Community shall take account of the objectives referred to in Article 130u [those relating to development cooperation and poverty reduction] in the policies that it implements which are likely to affect developing countries.'

In 2005, the EU agreed to apply a PCD approach in 12 policy areas that could accelerate progress towards the millennium development goals, stating:

> 'We reaffirm our commitment to promoting policy coherence for development, based upon ensuring that the EU shall take account of the objectives of development cooperation in all policies that it implements which are likely to affect developing countries, and that these policies support development objectives.'[1]

The 2007 Lisbon Treaty made this a legal commitment, stating that 'the Union shall take account of the objectives of development co-operation in the policies that it implements which are likely to affect developing countries'[2] and in 2009, the EU agreed to make the PCD agenda more operational, and use it to focus future policy. This was again reinforced by the EU Foreign Affairs Council in December 2013 on policy coherence for development.

At the UN, the eighth goal of the Millennium Development Goals focuses on a Global Partnership for Development referencing the need for improvements in trade, debt relief, and access to medicine and IT. Now, as the successors to the MDGs are being debated, the intention is that the five transformative shifts being proposed will 'at long last, bring together social, economic and environmental issues in a coherent, effective, and sustainable way.'[3]

The Organisation for Economic Cooperation and Development (OECD) has made explicit commitments to PCD stating, 'To meet the challenge of reducing global poverty, governments need to ensure that their policies on issues which go beyond aid and development assistance are supportive of, or at least do not undermine, their development-focussed policies.'[4] They have developed a model of 'building blocks' for implementing PCD (see below) and their Development Assistance Committee (DAC) regularly carries out peer reviews of individual member countries to assess their progress on PCD.

The OECD Building Blocks for Policy Coherence[5]

Building Block A: Political commitment and policy statements
Lesson 1: Educate and engage the public, working with civil society, research organisations and partner countries, to raise awareness and build support for PCD on a long-term basis.
Lesson 2: Make public commitments to PCD, endorsed at the highest political level, with clear links made to poverty reduction and internationally agreed development goals.
Lesson 3: Publish clearly prioritised and time-bound action agendas for making progress on PCD.

Building Block B: Policy co-ordination mechanisms
Lesson 4: Ensure that informal working practices support effective communication between ministries.
Lesson 5: Establish formal mechanisms at sufficiently high levels of government for inter-ministerial co-ordination and policy arbitration, ensuring that mandates and responsibilities are clear and fully involve ministries beyond development and foreign affairs.
Lesson 6: Encourage and mandate the development agency to play a pro-active role in discussions about policy co-ordination.

Building Block C: Systems for monitoring, analysis and reporting
Lesson 7: Make use of field-level resources and international partnerships to monitor the real world impacts of putting PCD building blocks in place.
Lesson 8: Devote adequate resources to the analysis of policy coherence issues and progress towards PCD, drawing also on the expertise of civil society and research institutes, both domestically and internationally.
Lesson 9: Report transparently to parliament and the wider public about progress on PCD as part of reporting on development co-operation activities and progress towards meeting the Millennium Development Goals.

Taken from OECD (2009) Building Blocks for Policy Coherence for Development

Through these international organisations and agreements member countries have committed to introducing and implementing PCD. The UK, and consequently Scotland, has an obligation to PCD but to date little in the way of formal mechanisms or structures have been put in place to deliver on this obligation.

In advance of the 2014 referendum on the constitutional future of Scotland, the Network for International Development Organisations in Scotland (NIDOS) produced a report on Scotland's Place in Building a Just World[6]. This report set out the case for policy coherence in Scotland, irrespective of the outcome of the referendum. Responding to the report, Scotland's main political parties made statements in support of the concept of PCD.

Post-referendum, this report aims to inform and progress the debate on PCD, proposing recommendations for how to implement PCD in Scotland. To arrive at these recommendations, which are set out in Chapter Two, six other European countries have been examined to explore how they have introduced, developed and implemented PCD,

looking particularly at what structures they have in place for delivery, reporting and accountability. In each of the six cases, Belgium, Denmark, Finland, Luxembourg, Netherlands and Sweden, PCD has been under discussion and/or development for a number of years. The intention is to establish the lessons learnt in each of these six with a view to developing an appropriate approach for Scotland to adopt. The results of this examination are set out in Chapter Three.

In addition, this report also aims to learn lessons on how we, as civil society, can engage with and promote PCD most effectively. To achieve this, discussions were held with representatives or civil society platforms/umbrella organisations in five of the six countries examined namely, Belgium, Finland, Luxembourg, the Netherlands and Sweden. Representatives were questioned on the role of civil society on PCD in their country, engagement with their own members on this issue and what they have found to be the most effective ways of engaging with decision makers. The results of these are set out in Chapter Four.

2. Findings & Recommendations

The following tables set out some key findings and recommendations as a result of the research undertaken for this report. In the case of each example given, more details can be found in the relevant sub-chapters, with page numbers for each given.

2.1 Findings and Recommendations for Implementing PCD

Findings	Recommendations
Without a strong legal or policy commitment, political support and government action on PCD can be dependent on individual ministers or governments and may decrease as they change. **Example:** As happened in the Netherlands between 2005-2000 (p24). Reflects concerns in Belgium, despite current commitment (p7)	Introduce a strong legal - or at least policy - commitment to PCD.
Action on PCD can be limited where there is a lack of understanding as to what it actually means. **Example:** In Luxembourg, PCD has been confused with promoting a coherent approach to development cooperation (p20)	Government should adopt a clear definition of PCD and work to raise awareness of this both within government and to a wider audience.
Governments' may consider PCD only relevant to EU policies rather than national policies. **Example:** Denmark still only refers to PCD in the EU context (p12); some officials in Luxembourg believe this to be the case (p20)	Any commitment to PCD should contain an explicit statement referring to national policies as well as those at EU level.
Support for PCD across government can be limited if it is the responsibility of the Department for Development. **Example:** In Sweden, there were concerns this would lead to the perspective that PCD is a matter only for development cooperation (p30)	PCD should be the responsibility of a cross-ministry body or a higher level minister. All government departments need to have some responsibility for PCD.
PCD can be less effective where there is not high level political support. **Example:** While Luxembourg has an Inter-Ministerial Committee, attendance is poor (p23). They have identified it would be useful to have a high level arbitrator of disputes between ministries (p40).	The head of government should send a clear message to ministers and departments of the importance of PCD and be able to arbitrate disputes between ministers when they arise.
In order to know what impacts policies are having on developing countries, it is important to work with them and reflect their comments. **Example:** For example, Finland with Tanzania (p16), the Netherlands with Ghana and Bangladesh (p26), Sweden with South Africa (p31)	Government should work with southern partners to inform their work on PCD and to enable assessment of impacts.

Findings	Recommendations
There is a danger that good mechanisms for implementing PCD can become a 'tick-box' exercise. **Example:** Belgium's new system of impact assessments may only require a 'yes' or 'no' in terms of compliance with PCD (p10); Sweden's Committee report on PCD is rarely debated by parliament before being approved (p34); Luxembourg's Inter-ministerial Committee has poor attendance (p23); the Netherland's reports on PCD implications of EU legislation are rarely more than a line or two (p28)	There is a need for strong and high level political leadership on PCD to support mechanisms put in place. Awareness raising work needs to take place to ensure parliamentarians and officials understand the importance of PCD.
Some of the most successful examples of progress on PCD have been where governments have decided to focus their work on specific issues. **Example:** This is the case in Sweden with its six challenges (p31) and in Finland with its case study on food security (p16)	Government should identify specific thematic issues to focus its PCD work; these may change to reflect current priorities or when sufficient progress has been achieved.
Regular reporting on PCD is essential to achieving progress. **Example:** The Swedish Government's biennial communications have developed PCD (p34), Luxembourg's Department of Development Cooperation produces an annual report that is debated at parliament (p23), the Finnish Government's first ever report on PCD this year has been hailed as a breakthrough (p17)	Government should report on PCD work and progress annually or, at least, biennially. Reports should be public and submitted to parliament for debate and comment.
Civil society should be included in formal processes for developing and implementing PCD and holding government to account. **Example:** Civil society engagement in Belgium's Stakeholder Meeting on PCD and the 2012 working group can be seen to have strengthened the new 2013 law on PCD (p7); Luxembourg's new PCD system will see their CID take balanced evidence from officials and civil society and make recommendations based on this public evidence (p23)	Civil society should be involved in the process for establishing a PCD system and a role for them should be built into mechanisms and procedures from the outset.
Transparency is key to making government action on PCD effective and accountable. **Example:** Civil society was unaware of the recent case studies on Ghana and Bangladesh in the Netherlands even though they could have added to these studies (p35). Belgium does not make public discussions on impact assessments making it hard to know whether policies are compliant with PCD (p16)	All government reports on PCD and meeting minutes from any PCD committees should be made public. Civil society, academia, southern voices and others should be consulted on reports and case studies.
There needs to be sufficient resources and funding for work on PCD. **Example:** The cut in funding to the Netherlands Policy Coherence Unit from six to one and a half staff has had a negative impact on its capacity and effectiveness (p27)	A funding commitment to PCD should be built into any new legislation or policy commitment and reflected in government budgets.

2.2 Findings & recommendations for civil society engagement on PCD

Findings	Recommendations
NGO platforms have had most success engaging with members and politicians or parliamentarians by focussing on specific thematic issues rather than PCD as a concept in itself. **Example:** Evident in all five countries. Finland, Netherlands and Sweden all formed members' working groups on thematic issues (p38, p42, p43) and Belgium hosted thematic discussions at parliament (p37)	Use specific development issues to engage with members and politicians Consider establishing thematic working groups for members. Consider hosting thematic discussions or debates for politicians.
PCD should be a part of all work and events that an umbrella group or platform engages in. **Example:** This has proved successful in Belgium (p36)	Include PCD within all issues and events worked on.
The percentage of NGO platforms' members involved in PCD directly is often quite small and limited to larger organisations with advocacy capacity. **Example:** This is the case in Belgium (p37), Luxembourg (p41), Netherlands (p43) and Sweden (p44)	Don't expect to get the involvement of all members, particularly smaller organisations, but continue to raise awareness and include smaller organisations in thematic groups, where relevant.
Establishing a working group or policy forum on PCD for larger, involved members is an effective tool for progressing work on PCD. **Example:** Finland (p27), Luxembourg (p46), Netherlands (p34) and Sweden (p37) have all done this meeting at differing intervals	Establish and maintain an ongoing working group or policy forum on PCD for engaged members.
Seeking commitments on PCD in advance of elections has been one of the most effective tools for civil society to progress PCD. **Example:** This has been the case in Sweden(p40), Luxembourg (p29), Finland and Belgium (p15)	Use upcoming elections to secure new or ongoing commitments to PCD from political parties.
While development party spokespeople are usually responsible for PCD there is a need to target politicians from other fields to ensure buy-in for PCD. **Example:** Sweden (p36) and Luxembourg (p29) have both learnt this, with the latter now targeting their prime minister	Target non-development party spokespeople and government officials.
Shadow or alternative PCD reports produced by civil society have had a major impact in raising awareness, pushing for change and holding the government to account. **Example:** Sweden's Barometer reports (p38) are the best example of this with Luxembourg (p30) and the Netherlands (p45) following suit	Produce civil society reports on PCD.
Regular ongoing contact with ministers and officials, both formally and informally, has proved effective in progressing PCD **Example:** Sweden (p50) and Luxembourg (p47)	Where possible engage in formal and informal working groups and meetings with ministers and officials.

3. PCD Approaches in other European Countries

In this chapter, six other European countries have been examined to explore how they have introduced, developed and implemented PCD, looking particularly at what structures they have in place for delivery, reporting and accountability. In each of the six cases, Belgium, Denmark, Finland, Luxembourg, Netherlands and Sweden, PCD has been under discussion and/or development for a number of years. For each, the history of PCD developments is covered initially then the specific systems and mechanisms in place for implementing, developing, defining and monitoring PCD set out. This is based on research and discussions with representatives of civil society working on PCD.

3.1 Belgium

While the origins of policy coherence in Belgium go back over a decade, it has only really been over the last few years that real awareness and progress has taken place. In the early 2000s the Council of Ministers established an inter-ministerial working group, although it never became active.[7] In 2003, a coordination unit in the Ministry of Foreign Affairs, known as a COORMULTI, was established to ensure coherence in all Belgian political positions at international level. [8]While being flagged by the OECD as a good example of a co-ordination body,[9] it was criticised, however, for not covering all Belgian policies and for failing to address incoherent policies.

Subsequent policies followed including notably Belgium's 2004 Policy Outline for Development Cooperation[10], which sets out the aim of 'increasing coherence between development and preventive diplomacy and conflict prevention (within the Ministry of Foreign Affairs); between development and debt policy (within the Ministry of Finance); and between development and peace-keeping (within the Ministry of Defence)'.[11] In May 2009, an agreement was signed between the then Minister for Development Cooperation, Charles Michel, and the Belgian NGOs, represented by 11.11.11 (Dutch speaking umbrella), CNCD-11.11.11 (French speaking umbrella), Coprogram and Acodev, on increasing the effectiveness of development cooperation. As part of this agreement, the Minister committed to:

> '…take several measures to enhance the coherence of the development policy, such as a full government debt relief and the inclusion of the development dimension in trade agreements. He wants to tackle tax havens, better regulate the international monetary system and look for additional means of financing development cooperation. The secretary has agreed to climate measures as well, including supporting the European objective to reduce the emission of greenhouse gases by 20% by 2020 and improving the Clean Development Mechanism. He will help to seek additional resources to counter climate warming after 2012.'[12]

Additionally, there was a commitment to establishing a consultation forum for NGOs and government to discuss the coherence of the Belgian policy twice per year, however, it ceased to operate some time ago.

Also in 2009, two members of staff were appointed within the Policy Advisory Unit to the Director General for Development Cooperation to work part-time on PCD (in reality there was only one person working part-time that had a real focus on PCD questions).[13] Despite these developments, criticisms were still levied at Belgium as this agreement was not binding and little progress on PCD was made. CONCORD, the European NGO confederation for relief and development, highlighted that, 'owing to its particular political system Belgium has several coordination mechanisms, but they do not mainstream PCD effectively'.[14] The OECD in its 2010 DAC Peer Review of Belgium stated that:

> 'Belgium's legislation does not ensure that domestic and foreign policies support, or at least do not undermine, efforts of developing countries to achieve sustainable and broad-based development. Also, policy coherence for development has often been misinterpreted as the co-ordination among the various entities that deliver Belgian aid, rather than the coherence of domestic and foreign policies with development goals.'[15]

It called on the Belgium government to make an 'explicit policy statement, endorsed at the highest political level'. The DAC Peer Review also congratulated NGOs on their work lobbying for more PCD.[16]

This advice was taken on board and in December 2011, the Council of Ministers agreed to the establishment of an Interministerial Conference on Policy Coherence for Development.[17] In May 2012, the Belgian Department of Foreign Affairs, Foreign Trade & Development Cooperation issued a press release stating that:

> 'Mechanisms by way of which Belgium can develop an institutional framework to guarantee coherence between the various Belgian policy domains must be identified at national level.'[18]

A working group formed of government officials and NGO representatives was set up to discuss a new system and, in March 2013, new legislation relating to the Belgian Development Cooperation was introduced, finally committing to PCD. The legislation sets out a new 'mechanism for policy coherence for development (PCD), which aims to guarantee PCD through high-level political commitment, greater policy coordination and independent monitoring of the progress made.'[19] This was followed up in December 2013 with the Belgian Council of Ministers adopting a common commitment, including federal and regional decisional levels, and announcing a number of measures to put in place a new system of PCD, with Belgium finally adopting the actual phrase 'policy coherence for development' for the first time.[20]

These measures, detailed below, include the establishment of an inter-ministerial conference, an interdepartmental committee and an advisory council, of which only the latter has been established. Subsequent legislation proposed a PCD platform to support civil society's work on PCD issues.

The elections of 2014 brought in a new government, potentially less supportive of PCD, and NGOs and others are waiting to see if and how they will implement the commitments of the 2013 PCD legislation, some of which are legally binding whilst others are recommendations.[21]

Developing PCD: the main drivers

According to the European Centre for Development Policy Management (ECDPM), civil society has been one of the main drivers for the implementation of a PCD approach in Belgium.[22] The 2008 Annual report by the 11.11.11, the Dutch speaking NGO umbrella, was party dedicated to PCD along with the 2009 Agreement (as above) and the involvement of 11.11.11 and CNCD-11.11.11 in the 2012 process that led to the new legal system.[23] They also reference the importance of both the OECD DAC Peer Reviews (2005, 2010) and the role of the EU as drivers, with political impetus from within Belgium only really playing a role since 2012.

Defining PCD

The 2013 Law on Development Cooperation makes a legal commitment to PCD as one of the law's six overarching themes and explicitly refers to the OECD definition of PCD.[24]

The 2013 annual report on development cooperation states that 'Policy coherence is a priority for Belgium, at both national and international level.'[25]

Implementing PCD

The new law of 2013 brings in a number of new structures to implement PCD, including:

- Inter-ministerial conference: composed of political decision makers from federal regional and community level to set the political context for PCD. [26]
- Interdepartmental committee: composed of representatives from the different federal ministries/departments 'to ensure that the different political areas are made more aware of the interests of developing countries'[27]
- Advisory council: composed of representatives of NGOs and academia who are responsible for answering questions from the Minister on PCD, monitoring mechanisms and making recommendations.

Of these, only the Advisory Council yet exists, with its first meeting having taken place in July 2014. The council aims to focus on some specific issues, linked to the Belgian and EU agendas, to work on in relation to PCD and present recommendations for action on to the government.[28]

The Interdepartmental Committee, which is a legally binding commitment, does not yet exist. The requirement for an inter-ministerial conference is not binding and it is yet to be seen whether the current government will respect these commitments. The PCD Platform introduced by subsequent legislation relating to the work of the federation and the *coupole* has held its first meeting.

Additionally, the Stakeholders Meeting of the Belgian Development Cooperation brings together government, civil society and academia annually. While each meeting will make reference to PCD, the 5th Stakeholders Meeting in May 2012 focused entirely on Policy Coherence. According to the Belgian Department of Foreign Affairs, Foreign Trade and Development Cooperation:

> 'This event has a dual objective. Firstly, it serves as a source of information on international challenges that development cooperation faces. Secondly, it examines political and organisational policy aspects relating to the Belgian context, and provides suggestions for the Belgian Development Cooperation. In doing so, it also seeks to stimulate policy coherence for development.'[29]

Monitoring and Accountability

In addition to the annual Stakeholders Meeting and the reports of the Advisory Council detailed above, the 2013 Law introduced a legally binding commitment to an annual government report to parliament on PCD that should include recommendations for action. No reports, however, have yet been published.

As detailed below, there is also a requirement for an annual report on the new impact assessments, which should include PCD as one of the factors being assessed. The first report of this kind is due shortly.

The civil society networks, CNCD-11.11.11 and 11.11.11's, annual report highlights progress on PCD in Belgium. The intention with this report is to continue to conduct an evalution of PCD progress each year.[30]

The 2013 Law called for an updating of the existing impact assessment system to include PCD. In effect, this has meant that, from January 2014, any new federal legislation must be assessed against 21 factors, such as gender and PCD, and an integrated impact assessment form must be completed.[31]

An Impact Analysis Committee was also established to monitor compliance and report annually on the system.[32]

The first report of this committee is due shortly; however, there are concerns around how transparent or effective it will be. On the form each of the factors assessed require little more than a 'yes' or 'no' answer as to whether the legislation is compliant. It is not yet clear whether there will be any accompanying explanation for how an answer was reached or how legislation complies or doesn't. Internal discussions on assessments are not public. Only the impact assessment form is public and this provides very little information.[33]

The only official review to have been carried out on PCD in Belgium to date is the 2012 Stakeholders Meeting of the Belgian Development Cooperation and the working group

created from that, as highlighted above. Before that event, CNCD-11.11.11 & 11.11.11 organised a workshop on PCD and issued a paper on PCD.[34]

Various civil society reports, especially those of the Coalition Against Hunger, have included reviews of progress on PCD in relation to specific food issues. CNCD-11.11.11 and its member FIAN issue also published a study, The Right to Food: A Tool to Promote PCD.[35]

3.2 Denmark

In Denmark the concept of policy coherence for development is not new but until very recently there has been little progress in implementing it.

As far back as 2004, the Danish Government was referring to coherence in relation to its policy on Africa and, in theory, the Department for Development Policy had coherence within its remit.[36] However, three consecutive OECD DAC Peer Reviews (2003, 2007 and 2011) have been critical of Denmark's lack of progress in putting PCD into practice or establishing mechanisms or structures to achieve this. Plus, according to ECPDM and ICEI, for the Department for Development Policy 'coherence is only a small part of a much broader mandate, and the focus is exclusively on coherence of instruments and policies within the development sector, not beyond.'[37]

In 2010, the Danish Ministry of Foreign Affairs launched a new strategy for Development Co-operation, *Freedom from Poverty – Freedom to Change*. This stated that Denmark would: 'Strengthen the coherence between policy areas and instruments for the benefit of development' and that:

> 'A wide range of policy areas can have an impact – positive and negative – on development. These include policies for defence and security, trade, industry, the labour market, agriculture, tax, the environment, climate and energy. A lack of coherence between policies and instruments can undermine the effort to fight poverty and create sustainable development. Denmark will therefore strengthen the link between the relevant Danish policies and instruments in order to achieve a higher degree of synergy to the benefit of development.'[38]

Yet, despite this positive sentiment, little seemed to change, with the OECD DAC review of 2011 stating:

> 'As recommended in the last two peer reviews of Denmark, and as stated in the OECD Council recommendation, member countries are advised to translate "political commitment to policy coherence for development into practice" (OECD, 2010f). In particular, Denmark needs to strengthen policy co-ordination mechanisms and systems for monitoring, analysing and reporting on the impacts of both Danish and EU policies on development in partner countries; a whole-of-government approach does not necessarily guarantee policies that promote better development.'[39]

At the time of the 2011 review, the Danish Government did commit to producing an action plan for 'ensuring that its own domestic policies do not affect those of developing countries negatively'.[40]

The Right to a Better Life, Denmark's 2012 strategy for Development Cooperation expanded on this, stating that:

> 'Political measures in other areas such as trade, energy, climate, security, migration, taxation, agriculture and fisheries often play a far more important role than development cooperation. Unless a stronger coherence between these policies is ensured, we run the risk of undermining the aim of poverty reduction and sustainable development. Accordingly, Denmark will work for stronger coherence between policies in the many areas that affect developing countries.'[41]

But, even in saying this, the Danish Government restricted themselves to promoting policy coherence at the EU level rather than nationally, saying 'it is at the EU level, rather than in Denmark, that decisions on policies with the greatest impact on developing countries are taken.'[42]

Objective 2 of the Danish 2013 International Development Cooperation Act, while acknowledging self-interest did give some legal basis to policy coherence:

> 'Danish development cooperation shall contribute to promoting Denmark's interests in a more peaceful, stable and equal world. Consequently, development policy is a central and integral element of Danish foreign policy, which recognises that developing countries are not only affected by development policies but also by other policy areas.'[43]

But as CONCORD Denmark, the network of Danish development NGOs, highlights:

> 'The new government has strengthened the declared commitments to PCD - PCD is part of the government bill; it is part of the objectives paragraph in the new Danish Law for Development cooperation and features in the government's Development Strategy. But still no implementation plan translating these legally binding commitments into practice has been produced.'[44]

CONCORD EU was also critical that 'Denmark currently has no formal mechanism for promoting PCD across ministries.'[45] One of the Danish Government's arguments for this being that, as a small government, communication between departments was already easy and, therefore, mechanisms to achieve this would be unnecessary.[46] This is something that has been challenged by the OECD and civil society.

In response to this lack of progress, in 2012 CONCORD Denmark produced a major report setting out 'a concrete proposal for the operationalisation of PCD in a Danish context that is both realistic, transparent, and yet ambitious.'[47] *Delivering Results - How Denmark can lead*

the way for Policy Coherence for Development, called for new systems and mechanisms for PCD including:

- Giving overall political responsibility for PCD to the Minister for Development Cooperation
- Publication of a biennial report on PCD progress
- The setting of overall objectives to serve as PCD benchmarks
- Introduction of a PCD work programme with thematic focus areas
- Making it mandatory for the European Affairs Committee in Parliament to cover PCD in its consideration of all EU initiatives
- Establishing a PCD mechanism within the Ministry of Foreign Affairs to screen policies for potential negative effects on developing countries and to assist committees across ministries to report on potential negative effects
- Introducing a mechanism for partner countries to assess and report on potential incoherencies as a result of Danish policies
- Exchanging PCD reports and assessments within the EU to share learning
- Formally involving external stakeholders in preparation of work plans, reporting and committees

The report also addresses three thematic issues of Danish and European politics that are of key relevance to the Policy Coherence for Development agenda.

Some of the recommendations of this report have been taken up by the government as part of their new action plan on PCD. The 2014 report, *A Shared Agenda: Denmark's Action Plan for Policy Coherence for Development*, includes provisions for: annual reporting on PCD (through inclusion in the annual development cooperation report); creating mechanisms for examining PCD, such as embedding it within the Special Committee for Development Policy; the setting of specific goals for PCD; and the screening of policies for PCD implications.[48]

However, the fundamental problem with this action plan is that it continues to refer to PCD purely in the context of EU policy and action, reinforcing again that the Danish Government does not feel PCD to be relevant to national policies. The report states:

> 'Denmark will concentrate its efforts on EU policies, as these rather than Danish national policies have the greatest impact on developing countries. The Danish efforts will thereby support EU work and efforts on PCD.'[49]

Developing PCD: the main drivers

ECDPM identify civil society and political leadership as the main drivers for PCD within Denmark.[50] The impetus for PCD at a national rather than EU level is definitely from civil society with a lot of work taking place on this, notably the 2012 Concord Denmark report.[51]

Defining PCD

Denmark's definition of PCD comes very much from the legal frameworks within the EU and OECD. The Danish Government clearly sees their goal as trying to make EU, policies more policy coherent, rather than national policies.

Implementing PCD

The Special Committee on Development Policy Issues, which consists of officials from the Ministries of Foreign Affairs, Finance, Business and Growth, Taxation, Food, Agriculture and Fisheries, Climate, Energy and Building, Environment, and Justice, has a remit for PCD, undertaking the above named actions. It can invite representatives of civil society, academia or other committees, notably the European Affairs Committee, to engage in identifying policy areas and setting objectives.

There are also new structures in place to enable the Minister for Development Cooperation to inform both the Foreign Affairs Committee and the European Affairs Committee of PCD priorities that have been set, to enable them to discuss and negotiate at the EU level accordingly.

Monitoring and Accountability

From 2014, the Special Committee on Development Policy Issues screen and discuss forthcoming EU policies relevant to PCD, identify specific policy areas to work on and set specific goals, actions and indicators in relation to these.[52]

As highlighted above, Denmark's work on PCD will be included in the annual report on development cooperation. They also intend to utilise the biennial PCD reports of the EU to follow progress. It is not clear in either case whether there will be any civil society involvement.

Once the Special Committee on Development Policy Issues has set PCD policy areas and objectives, it will give advice to the ministries relevant to each policy area. These ministries must 'take due consideration to the input from the Committee when formulating Denmark's objectives in the succeeding negotiations on the concrete proposal [EU policy proposal]'.[53]

As part of the process of developing *A Shared Agenda: Denmark's Action Plan for Policy Coherence for Development*, the Danish Ministry of Foreign Affairs engaged ECDPM to carry out a review of PCD in several other EU countries, specifically Belgium, Finland, Germany, Ireland and Sweden, to inform their plan.[54] As part of this, a conference was held in April 2013 under the title of *Promoting Policy Coherence for Development – Assessing issues and common challenges: insights for a Danish approach,* with participants from the Danish Government, countries covered in the review and civil society experts.

3.3 Finland

PCD in Finland goes back, if not in name but in principle, to a 2001 Government 'Decision-in-Principle', which stated that 'Finland's policy on relations with developing countries... aims to reconcile the objectives of Finland's foreign and security policy, trade policy and international cooperation.'[55] Even prior to this an element of policy coherence could be inferred from the integration of different ministerial portfolios. From 1995-2002, one minister was responsible for both environment and development. From 2003, one minister covered the briefs for both trade and development.[56]

In February 2004, the Government introduced a Resolution on Development. This set out the Government's new development policy in response to the UN Millennium Declaration. It committed Finland to the Millennium Development Goals along with a number of key principles including a commitment to coherence, with the resolution stating that:

> 'Achieving the aims of development policy requires improved policy coherence in national policies, multilateral cooperation and EU policies. Coherence in practical implementation also needs to be increased through better cooperation among authorities. The development policy perspective needs to be included in all the programmes and reports in which Finland's policies in issues affecting development are defined.'[57]

The Resolution set out a number of key thematic issues to be considered in a coherent way including human rights, trade, environment, agriculture, education and health.

The advisory group, the Development Policy Committee (DPC), which was reformed around this time, was also tasked with the role of enhancing PCD and commenting on policies across government rather than just the development policies of the Ministry of Foreign Affairs.[58] The DPC is mandated at the start of each new term of parliament and consists of representatives from the different parliamentary political parties as well as from civil society, business, trade unions and academia with input from experts of each of the government ministries. As a result it is itself a mechanism to be more coherent.

After national calls from civil society and others, Finland used its Presidency of the EU in 2006 to strongly push for greater policy coherence at the EU level, which also increased support for PCD nationally. In his final speech as EU President, Prime Minister Matti Vanhanen, said 'during our Presidency, we have also done a great deal to improve the coherence of development policy, for instance: an issue of primary importance to a significant global actor like the EU.'[59]

In 2008, during the 2007-2011 government, an inter-ministry coherence network was established to deal with questions of coherence.[60]

In 2012, the Finnish Development Policy Programme included policy coherence as one of four measures or principles that all policy decisions and mechanisms should be guided by.

These are:
- inclusion of a human rights-based approach in all activities
- enhancement of aid effectiveness
- strengthening of development policy dialogue and its strategic orientation
- improving of policy coherence for development[61]

It is recognised, however, that while there are good and established principles of PCD in Finland, they are not really being implemented.[62] In 2014, the annual report of the DPC focussed for the first time entirely on PCD. The report stated that, 'awareness of coherence questions has increased in government over the years; however, there have been few tangible results up until now.'[63]

The most notable development on PCD in Finland to date has been a pilot on food security using the OECD's PCD tool. The pilot, which concluded in November 2013, was carried out as part of the Development Policy Programme and 'the Government committed to the evaluation and promotion of coherence in agriculture, fisheries, environmental, trade and development policies that affect food security.'[64] It brought together all relevant ministries as well as other relevant stakeholders such as food producers, NGOs and researchers.

Mandate of the Food Security Pilot[65]
Purpose:
To innovate new, wide-ranging cooperation and to strengthen Finland's policy and voice for the purpose of advancing global food security.

Goals:
1. To evaluate and strengthen Finland's advocacy, action and decisions which impact global food security.
2. To provide the political decision-makers with information and recommendations as regards promoting and assessing policy coherence from the viewpoint of global food security.

Expected Results:
1. Create a baseline analysis of the present Finnish policies, especially EU policies, which affect food security.
2. Provide recommendations to decision-makers with regards to strengthening policy coherence in policy sectors crucial to food security.
3. Provide feedback to the OECD as regards piloting the Policy Coherence Tool and recommendations for its further development.'

Taken from: Ministry for Foreign Affairs of Finland (2013) Food Security in Developing Countries Can Be Enhanced Through an Interplay of Policies: Executive Summary of the Food Security Pilot

The pilot was well received, with the OECD stating that:

'The final report contains in-depth analysis of the policies impacting food security, as well as policy objectives with concrete recommendations for strengthening food security in developing countries. The experiences and model of the pilot proved very

useful; the positive experiences and the results could be applied to other PCD priorities such as taxation, trade, migration and security.'[66]

The impact of the pilot is yet to be determined as evaluation work is still ongoing. As part of the evaluation and reporting, some specific research has also been undertaken on the impacts of Finland's food security policies in Tanzania. The report of this should be published at the end of 2014 or in early 2015.

One clear outcome is that the model used for food security is now being applied to the issues of taxation and migration, again with relevant stakeholders being asked to collaborate.[67]

This year, 2014, has seen some new developments in PCD in Finland with the Government producing its own report on PCD for the first time, entitled 'Towards a More Just World Free of Poverty'.[68] This has been hailed as a breakthrough by non-governmental development organisations, who have been calling for this for 15 years. In the report, the Government stated it 'has invested heavily and through several means in policy coherence for development, viewing it as a key focus area for future development policy as well.'[69] It also detailed a number of focus areas for policy coherence work including tax evasion, trade, food security, climate change and migration.

The report generated media attention and was the subject of a plenary level discussion at the parliament. This very rarely happens on development issues and was the first ever debate on PCD. Due primarily to the input of the True Finn political party, however, the focus of much of the debate shifted onto aid. This reflects wider concerns about development issues in the current political climate. The debate did, though, result in calls for an entirely external evaluation of development policy beyond that carried out by the OECD or the DPC. [70]

The report has been criticised for trying to cover too much and the Committee on Foreign Affairs called for it to be more honest. It is yet to be seen whether this will become an annual (or, as Non-governmental development organisations wish, ideally even bi-annual) report by the government but indications are positive that it will be repeated.

Developing PCD: the main drivers

The impetus for PCD in Finland has come from strong political leadership backed by ongoing pressure and support from an active and engaged civil society. Early developments highlighted above gathered strength and focus in advance of, and during, the Finnish Presidency of the EU and with civil society's Call for Coherence conference. Subsequently all government programmes made commitments to PCD and two OECD DAC reviews provided additional impetus.[71]

Defining PCD

There is no national legal commitment to PCD in Finland but as there are few existing legal commitments similar to this, there have been no campaigns to create a legal mechanism.

Whilst this is something that might change, non-governmental development organisations have so far stressed that Finland has made a legal commitment to PCD through the Lisbon Treaty and other international agreements.

As detailed above there are numerous policy commitments to PCD, including in non-developmental departments. The 2012 Development Policy Programme, states 'The human rights-based policy underlines the importance of policy coherence for development and sets five priority themes to promote it: food security, taxation, trade, migration and security. In the programme, the government commits to applying the OECD's tool in assessing and promoting policy coherence for development under the theme of food security, based on the right to food.'[72]

According to the Ministry for Foreign Affairs in 2013, in a summary of their Food Security Pilot, 'in Finland, the concept [of policy coherence] means that development objectives are taken into consideration in national and EU level decisions on policies with a bearing on developing countries.'[73]

The government report on development policy in 2014 expands on this:

Policy coherence for development means that...
- Different policy areas consistently advance issues in the same direction so as to create the conditions for sustainable development and the eradication of poverty in developing countries.
- Developing countries and their development goals are taken into consideration in the decision-making of different policy areas, and
- No individual policy can invalidate the results achieved in another area; such action would embody inefficient use of public and private resources.'[74]

Taken from: Government of Finland (2014) Towards a More Just World Free of Poverty: Government Report on the Impact and Coherence of Development Policy

Implementing PCD

The inter-ministerial network on PCD, was established 2008, for 'awareness-raising and information exchange on PCD issues'.[75] The government's 2014 report said of it:

> 'Since the whole Government carries out development policy, the central government's high-level policy coherence for development (PCD) network convenes biennially with the aim of strengthening policy coherence and reducing inconsistencies.'[76]

The Development Policy Committee (DPC) is an advisory body mandated at the start of each new term of parliament and consists of representatives from the different parliamentary political parties as well as from civil society, business, trade unions and academia with input from experts of each of the government ministries. According to Kehys, Finnish NGDO Platform to the EU and one of the members, the DPC 'follows and evaluates Finland's

activities in various policy areas, which influence the developing countries. It also assesses the quality and effectiveness of development cooperation and monitors the level of public development policy appropriations'.[77] As part of this it can commission studies and reviews on policy coherence and meets regularly to focus on a specific topic in relation to PCD.[78]

In the 2014 report the Government also sets out a commitment to carry out more promotion and training on policy coherence throughout government branches.

Monitoring and Accountability

The Development Policy Committee's annual report always contains reference to PCD and in 2014 its report was entirely dedicated to PCD (see details below). As highlighted above, some of the members of the DPC are representatives of civil society.

DPC does include civil society and the 2012 policy programme had extensive consultation. Civil society has been represented in the Food Security Pilot and subsequent pilots on taxation and migration.

The annual reports on Finnish Development Cooperation to parliament can refer to PCD though the final report published before the format changed, that for 2011, which was published online in 2012, only made one small, passing reference to PCD.

In 2014, the Government itself produced its first report on PCD, which was presented to parliament for debate. It is anticipated that this will be repeated either annually or bi-annually but no concrete commitment to this has yet been made.

According to a UNDP report in 2004, 'The annual review of the implementation of Finnish Development Policy will include a stocktaking on coherence and it is also one of the main themes in the yearly statement of the Development Policy Committee.'[79] While it has been covered in more detail in the DPC reports, annual reviews on Development Policy only made passing reference at best, until the new format of the 2014 report.

Where there has been a more focussed attempt at evaluation is the Food Security Pilot (see above) and this should be repeated in the new pilots on taxation and migration.

The Government, in its 2014 report, stated that, 'The Government is also searching for the means to bolster the local research and analysis capacity in developing countries, and to analyse the development effects of different policy areas.'[80]

Prior to 2014, the only means of accountability has been through the reporting mechanisms highlighted above and the inclusion of civil society in these. The introduction of a parliamentary debate on the Government's new report on PCD this year, however, is a major step forward. It is yet to be seen if, or when, this will be repeated.

In terms of reviewing PCD in Finland, the DPC's 2014 report set out several key findings and recommendations as set out in the box below.

Key Findings and Recommendations from the Development Policy Committee's 2014 report[81]

'MEE has taken the initiative in cooperation with the MFA to promote business in developing countries and is aiming to start cooperation related to this with immigrant diasporas. In Team Finland, developing country business and corporate responsibility are included at the strategy level, but firmer commitment in implementing these in practice is still lacking. In developing funding for developing country business, the borders between different ministries have caused challenges.[a]

The MOF and the [sic] have both been deeply involved in international cooperation to curb tax evasion, which for developing countries is an important issue. Closer cooperation between ministries would bring better results from the aspect of development. MEE's viewpoint is linked to the lightening of the administrative burden of companies, for which reason Finland's line of country-specific reporting has been cautious.

There are good opportunities in comprehensive crisis management strategy and the MFA's fragile state guidelines for making cooperation between the MFA, MOD and MOI closer. The ministries have plenty of cooperation going on, but a more systematic way to take the development aspect into consideration on a crisis-by-crisis basis is still missing.

The MOI, MEE and MFA are all in close cooperation in immigration policy also with the countries of departure in relation to the evaluation of situations, but more widely the development aspect – for example in combating brain drain from developing countries and recognising the importance of diasporas – is not as yet a part of Finland's immigration policy.

The cooperation between the Ministry of the Environment and MFA is close in the preparation of the post 2015 development goals, climate policy and funding, because the situation and position of developing countries is at the centre of climate negotiations. Finland's international climate funding comes from development cooperation funds.

1. A stronger governmental mechanism is needed to ensure that decisions affecting developing countries are evaluated from the policy coherence for development point of view. The matter in hand could, for example, be a regular examination of different policy areas carried out by the MFA and the Prime Minister's Office under the auspices of the Minister for International Development.

2. The work of the Government in developing and resourcing work to guarantee policy coherence from the global sustainable development perspective should be the primary goal. Sufficient resources have to be reserved and directed towards cooperation between different policy areas.

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[a] For details of acronyms used here, see list on page 2. Team Finland is a network which promotes Finland's interests abroad.

3. The role of Parliament in promoting policy coherence needs to be strengthened. The Ministries should draw up a comprehensive coherence report for Parliament once every government term. The different political processes in all of the committees, particularly the Grand Committee, should have adequate information on how the matters being handled affect developing countries.

4. Different stakeholders need to be involved more closely in the expert level work to promote policy coherence. Research information, assessments and extensive public discussion on the possible developmental impacts of different decisions and policy choices are needed.

5. Finland should raise coherence to one of its main priorities in the EU, OECD, UN and other international negotiations. Improvement coherence also needs to be addressed particularly in the post 2015 development goal preparation process.'

Taken from: Development Policy Committee (2014) "Coherently towards equal opportunities: The State of Finland's Development Policy in 2014"

Externally, the OECD's Development Aid Committee peer review of 2012 also made several recommendations for PCD including the need to strengthen existing inter-ministerial mechanisms and capacity for analysis as well as setting strategic objectives and introducing new thematic working groups. [82]

3.4 Luxembourg

Whilst references to policy coherence in Luxembourg go back to the nineties, it has only been in the last couple of years that any progress or real commitments have been made to PCD.

The Development Cooperation Act of 1996 brought in a policy framework aligned to the Millennium Development Goals (MDGs) and, most relevantly, introduced an Inter-ministerial Committee for Development Cooperation (CID).[83] With representatives from nine government ministries, the remit of the CID was to advise on development cooperation policy. While policy coherence was not an explicit responsibility, it has featured on some meeting agendas[84] and the committee did consider it in relation to the EU Common Agricultural Policy.[85]

In February 2004, the then Minister of Cooperation and Humanitarian Aid, Charles Goerens, made a Declaration on Luxembourg's Development Cooperation and Humanitarian Aid Policy in which he highlighted the OECD's desire for more policy coherence and when on to state that:

'This subject [policy coherence] is raised regularly within the context of the dialogue on policy issues with our various target countries. To reflect the importance of this

issue, a "Policy Coherence" desk has been set up within the Development Cooperation Directorate. We are also working together with other Member States of the European Union as part of an informal network of correspondents in charge of this issue, which was set up last October.'[86]

His successor, Jean-Louis Schiltz, then made a further statement in November of the same year:

"Progress in north-south relations also depends on the coherence of our policies. Coherence allows us to introduce into the globalisation process a social and human dimension that is absolutely necessary. This means in particular that the goal of reducing poverty needs to be taken into account in policies at the national, European and world level, whether we are speaking of policies relating to agriculture, trade, the environment or finance."[87]

In 2005, Luxembourg used its presidency of the EU to promote policy coherence again, naming it as one of three priorities for development cooperation.[88] The OECD also applauded it for 'having co-ordinated agreement between member states on 12 sectors relevant for policy coherence for development' during this time.[89]

Despite these positive announcements and EU level engagement, it appears that during the following years very little progress took place nationally on PCD and there was no concrete action.

Reasons for this are attributed to, on the one hand, that the government 'take it for granted' that their policies are coherent[90] and, on the other, a level of misunderstanding as to what policy coherence actually is. In the former case, officials often see policy coherence purely as an issue for EU policies. In the latter, it is confused with making development cooperation policies coherent. The 2012 OECD DAC Peer Review went as far as saying:

'The notion of PCD, however, is to a large extent confused with promoting a coherent approach to development cooperation, or else it is confined to the European level, as the Luxembourg authorities consider that purely domestic policies have little or no impact on developing countries, in contrast to common European policies.'[91]

2012 was the start of some major developments in PCD in Luxembourg, beginning with a revised law on development cooperation. This, for the first time in law, made explicit reference to PCD. It also added policy coherence to the remit of the CID and stated that it should be covered in the annual report to parliament on development cooperation. Issue-wise it made specific reference to improving government procurement. The then Minister for Development Cooperation and Humanitarian Affairs, Marie-Josée Jacobs, in her preface to the 2012 Development Cooperation report stated:

'I would like to emphasise that, for the first time, policy coherence for development, which we all wished for and expected, is now an integral part of this annual report

for 2012. Based on the committee's work, my role consists of drawing my fellow ministers' attention to potential inconsistencies and reviewing the work of Luxembourg's Development Cooperation with a critical eye.'[92]

Despite this, the OECD is still critical, stating that, 'neither the government programme nor the amended law specifies what is covered by "policy coherence for development". Nowhere is there mention of the need to ensure that Luxembourg's national policies reinforce or, at least, do not hamper the development efforts of developing countries.'[93] They called on the Luxembourg Government to:

OECD Recommendations for the Luxembourg Government
- 'Sensitise and train staff in matters relating to policy coherence for development, in Luxembourg and in partner countries, and use the resources available domestically and at the European level to compile and analyze data concerning the impact of domestic policies on developing countries.
- Use these data to identify policies that have potentially adverse impacts.
- Grant the inter-ministerial committee the institutional, human and material means needed to promote, monitor and assess policy coherence in the key fields identified as having a potentially adverse impact on developing countries.'

Recommendations of the OECD's 2012 DAC Peer Review[94]

Mechanisms about to be put in place by the CID (see below) may finally lead to concrete action on PCD taking place, although this is still to be seen.

Developing PCD: the main drivers

Civil society has been the main driver for PCD in Luxembourg. While the government has been supportive of action at an EU level, it has mainly been through the work of civil society backed by some supportive officials and backed up by OECD reviews that have led to progress.

Defining PCD

The lack of a clear definition and understanding of PCD (see above) has clearly been one of the key difficulties for progressing PCD in Luxembourg.

Implementing PCD

The Inter-Ministerial Committee for Development Cooperation (CID), chaired by the Director of Development Cooperation, is part of the Ministry of Foreign Affairs. The committee meets roughly every two months and is composed of a representative and a deputy of each of the government ministries, as well as a representative of the prime minister. Prior to the 2013 elections only representatives of ministries deemed relevant were part of the CID but this was widened to all ministries and that of the prime minister following the elections.

The CID invites representatives of civil society to attend one of the meetings each year (typically in December) to hear their views on progress towards PCD and of any incoherencies.

While the structure of the committee is good, it still needs to improve in practice. Attendance by ministry representatives can be very poor, with only one-third at each meeting, and a lack of interest in those present has been observed at the annual civil society meeting. That said, the current chair of the committee, Martine Schommer, is a strong advocate of PCD and has done a lot to work with civil society and push PCD up the agenda.[95]

Monitoring and Accountability

All of the CID meeting minutes are publically available (a positive move, which is unusual compared to other inter-ministerial committees in Luxembourg).[96]

The Department of Development Cooperation produces an annual report, which since 2012, must include PCD. This is debated at parliament as part of the annual debate on Development Cooperation. The parliament also invites civil society representatives to present their views on development cooperation annually. The Fair Politics Barometer report[97], coordinated by Cercle de Coopération des ONG de développement, has been particularly well received and discussed within parliament.

A very recent and potentially major breakthrough is the introduction of a new mechanism for tackling potential incidences of incoherence. This could address some of the criticisms of PCD in Luxembourg, including that of the OECD which states 'in the absence of a work plan targeted at priority topics, and given the limited mandate and resources of the Committee, progress has been slow and undocumented'.[98]

The CID has decided that, going forward, it will focus in detail on particular topics put forward by committee members themselves, civil society, the OECD DAC or by the EU. Topics will be decided in conjunction with the relevant ministries then the committee will invite two expert witnesses to give evidence. One witness will be from the relevant ministry, the other will be selected by civil society. Both witnesses will be invited to the same meeting, after which the committee will hold a subsequent meeting to decide on a position and recommendations. These recommendations, which will be public as with all CID minutes, will be presented to the government as well as being included in the annual report (and debate) to parliament.

How effective this will be in practice is yet to be seen but it is the first time recommendations will be put forward rather than just discussions. NGOs feel the equal weighting given to a civil society invited witness increases the scope for meaningful outcomes. It is anticipated that the first topics will be discussed towards the end of 2014.

In terms of reviews of PCD in Luxembourg, externally, there is the Fair Politics Barometer Report, coordinated by Cercle de Coopération des ONG de développement, as detailed in

chapter four, and the various OECD DAC Peer Reviews that have taken place. Reviews are not yet carried out by the government beyond the annual reports highlighted above.

3.5 Netherlands

The Netherlands was one of the first countries to adopt a PCD approach. It did so nationally with a high level of political leadership rather than in response to developments within the EU, as has been the case in other countries. [99] In fact, in its 2006 DAC Peer Review, the OECD stated that 'The Netherlands has also been a major source of influence on the growing international consensus on the importance of policy coherence for development.'[100]

Jan Pronk, the Minister for Development Cooperation, introduced a policy coherence agenda in his second term in office, 1989-1998. During this time 'the divisions between development cooperation and foreign relations were broken down'.[101] His successor, Eveline Herfkens, built on this and in May 2002, a formal Policy Coherence Unit (PCU) was created.

ECDPM's EU mechanisms that promote policy coherence for development[102]

'The PCU, headed at the director level, is situated within the Directorate-General for Development Cooperation (DGIS), which itself is part of the Ministry of Foreign Affairs. The PCU has three main duties: raising awareness of the need for policy coherence for development, both nationally and internationally; intervening on a regular basis in national policy formulation to tackle concrete policy incoherencies; and working closely on coherence issues with line staff and management divisions in Foreign Affairs and other ministries.

The PCU's primary task is to intervene in the formulation and implementation of non-aid government policies taking the perspective and interests of developing countries as its starting point. Acknowledging that most key policies are already within the purview of the European Union, the PCU places particular emphasis on EU policies. The unit participates in national EU coordinating mechanisms, such as the high-level inter-departmental EU coordinating committee that prepares the instructions for Council meetings in Brussels and the inter-departmental committee that screens all Commission proposals. It also drafts an initial Dutch position on EU issues which nowadays includes an assessment of the impact on developing countries. In addition, the Dutch Minister for Development Cooperation may intervene directly at the highest political level to improve coherence. To heighten its effectiveness, the PCU concentrates on a selected number of focal areas: trade (top priority), agriculture (top priority), trade-related aspects of intellectual property rights (TRIPS) (with an emphasis on health), sustainable fisheries, product standards and market access, and migration.'

Taken from: ECDPM (European Centre for Development Policy Management) & ICEI (Instituto Complutense de Estudios Internacionales) (2006) EU mechanisms that promote policy coherence for development

The PCU was welcomed by the OECD in its 2006 DAC Peer Review as a positive move, with the review going on to state that 'The Netherlands now has a "winning combination" of

political commitment, a clear policy framework and the capacity to deliver through a dedicated Policy Coherence Unit (PCU) located within the MFA [Ministry of Foreign Affairs].'[103]

In 2009, an external evaluation of the PCU took place.[104] This highlighted some of the positive aspects of PCD in the Netherlands: with its wide brief and as the responsibility of a cabinet minister, the PCU can influence decisions at the highest level. The evaluation did, however, suggest that from 2005-2008, PCD was less of a focus than during the initial period of the PCU. It also called for better co-ordination between departments and for more resources for the unit.

While having no specific legal commitment to PCD, in 2011 the Netherlands did make a commitment to PCD in the thematic areas of international financial stability, climate, food security, migration, and peace & security,[105] in line with the EU's focus areas for PCD.

In 2012 the foreign trade and development cooperation portfolios were merged into one, following the appointment of Lilianne Ploumen.[106] This again can be viewed as a commitment to policy coherence and, in fact, Lilianne Ploumen made her intentions to champion PCD clear on her appointment. This was re-asserted in the 2013 Ministry of Foreign Affairs document on a new agenda for aid, trade and investment, which also set out examples of where assessments for policy coherence need to be made (such as the case study below) and made it clear that 'If interests conflict, the government must make clear and measured choices in each individual case, guided by the principle of sustainable and inclusive growth.'[107]

PCD in the Netherlands: Tax Treaties

'Dutch companies that maximise their profits by employing contrived tax avoidance arrangements can damage low- and middle-income countries. Low taxes for individual companies do not weigh up against the unintended loss of tax revenue in low- and middle-income countries. Together with the Minister of Finance, we are studying whether tax treaties concluded by the Netherlands with a number of developing countries are in line with the memorandum on Dutch tax treaty policy of 2011. In doing so, we will see whether these treaties have unintended effects. That would be the case if, for example, the treaty with the Netherlands presents more opportunities than treaties with other countries to erode the tax base in developing countries. Should that prove to be the case, we are prepared to enter into dialogue with those countries. Of course, treaty partners themselves may launch a dialogue with the Netherlands on the treaties. The Netherlands is actively supporting an OECD action plan to combat tax avoidance and the erosion of tax bases.'[108]

Taken from: Ministry of Foreign Affairs of the Netherlands (2013) A World to Gain: A New Agenda for Aid, Trade and Investment

While much of this seems very positive, in its 2013 report, CONCORD stated: 'In the Netherlands, PCD in specific policy areas is now coordinated ad hoc at the interdepartmental level, and EU policy proposals are screened on development impacts. There are no focal

points across departments or ministries. It is difficult to assess to what extent PCD is effectively mainstreamed from the outside.'[109]

That said, since the appointment of Minister Ploumen and the new policy agenda, there is optimism from civil society that PCD is moving back up the agenda in the Netherlands.[110]

One reason for this was a resolution by the Greens (Arjen el Fassed), adopted by the Dutch parliament in 2011, to calculate the impact of the so called *public bads*, which contributed to the discussion on how to measure the impact of incoherent policies. Another reason for this optimism is the piloting of two 'coherence reports'; case studies of the impacts of all aid and, crucially, non-aid Dutch policies on two partner countries, Ghana and Bangladesh. In the case of Ghana, the 'extent donor policy incoherence presents a challenge to the country' was examined for the years 2006-2011.[111] For the first time in the Netherlands, this resulted in assessment of the actual impacts of PCD, analysis of what has happened in practice 'on the ground', and the creation of indicators to measure PCD.

These case studies were presented to parliament, though disappointingly were not debated at all. A report analysing the options for coherence of Dutch and EU policies for development objectives in Ghana was also produced following the case studies but again there was no interest in it at parliament.[112]The Ministry for Foreign Affairs now intends for them to be used to promote similar work at the EU level. In a letter to parliament, the Minister for Foreign Trade and Development Cooperation stated that:

> 'The Ministry of Foreign Affairs hopes that this pilot contributes to furthering the PCD cycle in the EU and will stimulate the OECD and others to undertake pilot studies in this field. Our ultimate goal is to better inform (new) policy making by the Netherlands and the EU. Furthermore, we hope that the pilot will contribute to establishing a policy feedback mechanism in which objectives and indicators for PCD policies are continuously improved by assessing their impacts on developing countries in practice. This is a task that cannot be outsourced. In due course, such assessments should also become part of an ongoing policy dialogue of the Netherlands and the EU with partner countries.'[113]

Developing PCD: the main drivers

As outlined above there was strong political leadership to develop a PCD approach in the Netherlands. This though, was in large part, influenced by the lobbying work of the Evert Vermeer Foundation (now renamed the Foundation Max van der Stoel) which has close, formal ties with the Labour Party in the Netherlands. They presented case studies of policy incoherencies, on issues such as EPAs, raw materials policy, biofuels, migration, climate; lobbied for the introduction of PCD; and conducted impact studies, to examine the impact of incoherent European/ Dutch policies in countries like Ghana, Rwanda and Tanzania (the results of which were presented in the European and Dutch Parliament).

Defining PCD

In the letter that established the PCU in 2002, Eveline Herfkens, the then Minister for Development Cooperation stated that, 'the Dutch government's awareness that the main goal of its development cooperation policy – sustainable poverty reduction – is not just a mission for the Minister for Development Cooperation and not just a matter of providing development assistance.' The Minister went on to say that '…moving towards a coherent policy for poverty reduction requires careful examination of the development dimension of all relevant policy areas, and that the interests of low income countries must be explicitly taken into account.'[114]

In 2013, a Ministry of Foreign Affairs document on a new agenda for aid, trade and investment also stated that 'policy coherence for development means that the consequences of our policy for low- and middle-income countries will be taken into account in our decision-making.'[115]

Implementing PCD

An interdepartmental committee consisting of civil servants from each of the government ministries is responsible for considering PCD for all EU legislation.

This committee is overseen, and supported, by the PCU. The PCU, is part of the Directorate General for International Cooperation (DGIS) and reports directly to the DGIS and to the Minister for Foreign Trade and Development Cooperation. Although it previously had six staff, as a result of budget cuts it now has only the equivalent of one and a half. Its work is effectively three-fold, as explained below.

The Netherlands: Role of the Policy Coherence Unit
1. It provides inputs related to development cooperation in the interdepartmental committee that formulates positions for decision-making in government on proposed European rules and legislation.
2. In a project mode, it works towards concrete results on a limited number of topical PCD dossiers in collaboration with departments within the Ministry of Foreign Affairs and other relevant sectoral ministries.
3. It strengthens attention to PCD within the European Union, the European Commission and the OECD, by participating in evolving groups of like-minded countries on specific PCD dossiers.'[116]

Taken from: Engel,P, Keijzer,N, van Seters, J, Spierings, E (2009) External Evaluation of the Policy Coherence Unit of the Netherlands Ministry of Foreign Affairs, ECDPM Discussion Paper 91

Monitoring and Accountability

The interdepartmental committee, with input from the PCU, reports to parliament on the PCD implications of all EU legislation but this is often only a line or two that doesn't get discussed. There is no civil society engagement in this process. The Working Group for the Assessment of new Commission Proposals (BNC), on which all ministries are represented, is chaired by a senior MFA official. It reviews and assesses all new Commission proposals. A

coordinated initial Dutch position is prepared by specialists from the ministries involved. A special form ('BNC-fiche') is used to assess each Commission proposal and to develop a national position. Since May 2004, this form includes a paragraph that highlights possible effects on developing countries. This 'PCD test' is done by the competent ministry in conjunction with the Coherence Unit or MFA specialists. The Unit takes part in the BNC exchanges and meetings to promote a development-friendly Dutch position. Completed draft *fiches* are passed on to the CoCo for discussion and confirmation and then to the cabinet. Once adopted, they are sent to the Parliament and the Dutch Members of the European Parliament.[117] Reports on the recent case studies on Ghana and Bangladesh were also submitted to parliament.

According to ECDPM, the Netherlands has also, 'initiated an informal *policy coherence for development network'* linking ministries for foreign affairs and development cooperation in different EU countries in order to share information. [118]

In none of the above cases is there any official civil society involvement, though civil society itself is now working on its own report on progress on PCD in the Netherlands (see chapter four) and does conduct meetings with civil servants on PCD related issues.

The PCU, to a certain extent, has 'a responsibility to monitor other national policies for possible incoherencies'[119] but it is not clear that it can hold ministries to account to any great extent.

As highlighted above, the case studies on Ghana and Bangladesh have introduced new processes for assessing the impacts of PCD and these will hopefully be rolled out further.

Civil society is not officially included in any formal government or parliament structures or mechanisms, nor where they invited to be involved when the case studies on Ghana and Bangladesh were even taking place. Several key organisations, including Foundation Max van der Stoel, Woord en Daad and Partos, have recently come together to form their own external permanent policy coherence group, one of the aims of which is to hold the government to account.

Measurement of Dutch PCD has now taken place in relation to the impacts of four policy areas on two partner countries, Ghana and Bangladesh (see above). To be able to measure these impacts, result chains were formulated for the four areas, namely, trade and finance, security, migration, and climate. The objectives and indicators are specific to each issue and country. These result chains and their outcomes can be viewed on the Government of Netherlands website.[120]

3.6 Sweden

In 1999, a parliamentary committee was established to investigate how to create a Swedish policy on global development. The result of the committee, along with input from the Committee on Foreign Affairs, was a report on how Sweden could contribute to equitable and sustainable development through its development aid as well as by creating coherence within all other political areas to support the developmental goals. Following the report, in 2003 the Government presented the bill *Shared Responsibility – Sweden's Policy for Global Development*, which was later adopted, with some amendments, through a consensus by all the political parties in the Swedish Parliament. [121]

With this bill, Sweden became the first country in the world to enact legislation to have an official coherence policy on international development. It was called the Policy for Global Development (PGD) and stated that:

> 'Sweden should pursue a coherent policy for global development. Sweden's policy for global development should be based on a holistic view of what drives development and of the measures that are required to achieve equitable and sustainable development on a global scale. It should embrace all areas of policy and of political decision-making.'[122]

Through the PGD, Sweden made a very strong and ambitious commitment that all government policy areas should act coherently to comply with and contribute to the goal of an equitable and sustainable global development. The policy is characterised by two guiding perspectives: a rights perspective and a poor people's perspective on development.

It gave every government ministry responsibility for formulating and implementing policy to contribute to the goal of policy coherence. Linkages were established, for example, between security, trade, agriculture, education, public health and migration policy on the one hand, and global development on the other; the aim being to ensure that each government department considers how any of its policies and working practices will affect the Government's overall Policy for Global Development. This whole-of-government approach, emphasising that all policy areas should work for an equitable and sustainable global development, positioned Sweden at the vanguard of international development cooperation.

The PGD also led to the introduction of various mechanisms for delivering PCD, including an annual government report to parliament on the PGD, the establishment of a Global Development department in the Ministry of Foreign Affairs and a commitment to establishing an evaluation structure. [123]

The value of attaining cross-party support was also demonstrated in 2006 when the commitment to PGD was maintained, despite the first change in government for 12 years.

However, despite being ground breaking and advocating some very positive measures, some difficulties with, and criticisms of, the PGD arose early on. OECD in its Peer Review of 2005 noted that the decision to house the department responsible for PGD within the Ministry of

Foreign Affairs rather than the Prime Minister's office, as was originally planned, '(incorrectly) reinforces the perspective that PGD is a matter only for development co-operation'.[124] The Peer Review also noted that the first government report on PGD in 2004, 'did not address substantive issues and was essentially limited to process planning.'[125]

In 2008, the Government published its PGD communication called Global Challenges – Our Responsibility, which, in its own words:

> 'signals a new departure in Sweden's policy for global development by setting out in concrete terms ways in which coherence and cooperation can strengthen Sweden's overall contribution to equitable and sustainable global development.'[126]

This communication set out the Government's plan to concentrate on six key global challenges, namely: oppression; economic exclusion; climate change & environmental impact; migration flows; communicable diseases and other health threats; and conflicts and fragile situations, in a bid to make the PGD more effective. The Government view was that, 'the large number of objectives previously formulated combined with the limited attention accorded to management considerations have hampered policy implementation.'[127]

Three focus areas were identified for each of the six challenges, resulting in 18 objectives. The communication also set out more measures for implementing and achieving these 18 objectives (see box below).

Government measures to be introduced to deliver new PGD objectives: [128]
- 'draw up activity-specific, quantifiable objectives and outcome indicators for global development policy work, including work in connection with the six global challenges and focus areas, and incorporate these into regular management systems and working procedures so that responsibility allocation and forms of cooperation are clearly defined
- instruct relevant government agencies to contribute to policy implementation
- establish a global policy development forum under the direction of the Ministry for Foreign Affairs with a view to promoting coherence and synergies and clarifying and resolving conflicts of objectives
- conduct targeted evaluations of policy implementation as a basis for subsequent performance and outcome evaluation reports and future policymaking, and to provide an instrument for promoting continuous learning
- report on outcomes of the policy to the Riksdag in 2010, focusing on the six global challenges
- conduct a pilot project for the purpose of developing a strategy for Swedish cooperation with South Africa that is not restricted to development assistance.'

Taken from: Government Offices of Sweden (2008) Global Challenges - Our Responsibility: Communication on Sweden's policy for global development

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Resulting from these six global challenges, the Swedish Government established six inter-ministerial working groups for the implementation of policy coherence – one for each global challenge.

Inter-ministerial consultation should take place by departments affected by a decision. For example, with a government Bill the departments should set aside time to take part in discussions about how the Bill will affect them with regard to international development issues. Parallel to this institutionalised dialogue and preparation, there are several informal processing channels for communication between the different departments, which is equally important. There is also a policy coherence focal point in each ministry that collaborates with relevant officials in the Ministry of Foreign Affairs (which, as highlighted above, oversees the PGD).

The Swedish Government's 2010 communication on PGD, 'Shared Responsibility for Global Development' explains this further stating that:

> 'Within the Government Offices, there are interministerial working groups for e.g. international trade, migration policy and food safety. There are also informal working groups for the six global challenges. These working groups function as networks for the relevant ministries in the Government Offices and relevant implementation agencies to stimulate cooperation. They are important policy implementation instruments.'[129]

In its peer review of 2013, the OECD stated that, 'Concentrating on these specific challenges has contributed to more structured work on policy coherence for development within the Government and enables better comparability between different areas over time.'[130]

However, almost ten years after the introduction of the PGD, the 2012 civil society Barometer report raised serious concerns about it, stating: 'We see with increasing concern a shift where PGD is interpreted in a way that was not intended. Current policies are increasingly consistent with Swedish and European security and economic interests, and not primarily with the objective of sustainable development.'[131]

Recommendations of the 2012 Barometer report:[132]
- The government should strengthen the PGD's position on the political level in the Government offices by making PGD an integral part of the Government Commission in the form of a state secretary group.
- The Parliament should decide on implementation of regular and independent assessments of PGD.
- The Parliament should strengthen its role in monitoring the PGD by increasing the transparency of the PGD work, e.g. by involving more committees.
- The Government should ensure the participation of civil society and national Parliaments in the consultations carried out in Sweden's partner countries, including the national NU-consultations.
- The government should build capacity on PGD and improve the coordination between the different ministries by allocating sufficient resources to revitalize the interdepartmental working groups.
- The Government should develop clear indicators to monitor and measure compliance with and the outcome of PGD.

CONCORD Europe highlighted that, 'The Swedish PCD inter-ministerial working group concentrates on particular topics, but has so far showed limited effectiveness.'[133]

The 2012 government communication on PGD, The Global Challenge of Economic Exclusion, itself acknowledged that 'Overall, the assessment 2010-2012 of the work with the six global challenges demonstrates that the greatest room for improvement is within coordination and cooperation.'[134]

The OECD Peer Review of 2013 suggested a 'renewal of its [Sweden's] political commitment to policy coherence for development may be timely', following criticisms from civil society and from the parliament that the process for dealing with incoherencies is not transparent enough, nor are there indicators for measuring progress - despite this being recommended in the 2009 DAC Peer Review. [135]

Responding to the OECD review and other recommendations, the Swedish Government commissioned Statskontoret, the Swedish Agency for Public Management, to carry out a review of the Policy for Global Development. The report of its findings was published in February 2014.

CONCORD Sweden produced an 8-point work plan for a fresh start on PGD, echoing some of these recommendations and used it to secure supportive statements from six out of the

eight political parties in advance of the September 2014 elections. Both CONCORD Sweden and the Swedish Government have produced their 2014 Barometer and PGD Communication respectively. As stated in the 2012 PGD Communication, the 2014 Communication will introduce a new set of six global challenges to focus on.

The elections resulted in a change of government. Both parties in power, the Social Democrats and the Greens, have made strong commitments to PCD, including a promise of more resources and placing responsibility for the PGD with the more senior Minister for Foreign Affairs rather than the Minister for Development Cooperation, as at present.[137]

Developing PCD: the main drivers

At the forefront of PCD, the impetus to develop an approach has come from within the Government and Parliament, supported by civil society. The OECD DAC Peer Review of 2000 credited, 'the strong role played by parliament (Riksdag) which, at that time, had just elaborated a broad statement of national policy, underscoring the interest of "good neighbourhood" (among Nordic and Baltic sister states), of "Sweden in Europe", especially the European Union (EU), and "Sweden in the World" (global security through bilateral and multilateral partnerships).'[138] It also referenced the influence of the DAC Strategy for the 21st Century and the Millennium Declaration.

While Sweden's commitment to PCD is often referred to as legal, having been brought in by a parliamentary bill, the 2005 OECD Peer Review points out that, 'Although it was voted upon by the Parliament, PGD is not a "law". In the Swedish system such a policy is used as guidelines which help direct Swedish government authorities in subsequent implementation.'[139]

Defining PCD

Sweden set out in detail its approach to PCD in the Policy for Global Development (PGD), as highlighted above. This commitment has been reinforced by the biennial communications by the Government on PCD.

Implementing PCD

A unit responsible for PCD, the Unit for Development Cooperation Governance, sits within the Department for Development Cooperation in the Ministry for Foreign Affairs and helps coordinate between Ministries, who each have their own focal point for PCD, and gives advice to each. [140]

The Committee for Foreign Affairs is also responsible for responding to Government communications, passing comment when individual Ministries don't agree and inviting other committees to respond. Although in the past, two or three additional committees have responded, in 2012 no other committees commented. The report of the Committee of Foreign Affairs is then approved at a plenary of parliament but there is often little real debate around this.

There are also inter-ministerial working groups on specific issues and informal working groups on the six global challenges as highlighted in the 2010 PGD Communication.

Monitoring and Accountability

The 2003 bill stated:

> 'Evaluation and continual analysis of all our measures will be essential in the work of creating policy coherence. The Government will therefore report to Parliament on a regular basis on the measures being implemented to achieve the goal of equitable and sustainable development.'[141]

This commitment has been met by the Government's biennial communications on PGD to parliament, as detailed above.

The Government report provides the basis for a performance model that can be used to follow up the results of work on policy coherence, which will make it possible to monitor developments over time.

The overall assessment is categorised on a three-point scale where the Government concludes either that progress has been 'good' or 'relatively good' or that 'there are certain deficiencies'. The long-term aim is for each focus area to make 'good' progress in all its component parts. The overall assessment is intended to provide a baseline – a starting point that can be used to make improvements where they are most needed, and also to illustrate how results change over time by using the same criteria for the next round of reporting.

While progress is measured using this three-point scale, and this introduction of indicators has been welcomed, there are calls to move towards results based indicators rather than progress based ones. The 2012 and 2014 Government PGD Communications did contain incoherencies for the first time. As yet though, they do not state how these incoherencies will be resolved.[142]

The launch of the communications are normally accompanied by larger meetings with other stakeholders involved, including civil society, but there is no formal input from civil society in the formulation of report.

The communications themselves introduce an element of accountability by assessing and stating progress against each of the set objectives. These communications are debated by the Committee for Foreign Affairs and responded to.

An extra level of accountability is put in place by civil society in Sweden. Shadow-reports (Barometers) have been published by a coalition of Swedish NGOs since 2006 (by CONCORD Sweden since 2009/10). These barometers report on how they think the Government has really performed against the stated global development policy objectives.

These shadow reports bring together the experience and knowledge of NGOs and others to help hold the Government to account, offering their own verdict on how it is doing in relation to the six global challenges.

In addition to the Barometer reports, the Statkontoret evaluation was published in 2014, as discussed above. Although this was a one-off there are calls to make this a regular feature.

4. Civil Society engagement in PCD

This chapter aims to learn lessons on how we, as civil society, can engage with and promote PCD most effectively. To achieve this, discussions were held with representatives or civil society platforms/umbrella organisations in five of the six countries examined in Chapter 3, namely Belgium, Finland, Luxembourg, the Netherlands and Sweden. Representatives were questioned on the role of civil society on PCD in their country, engagement with their own members on this issue and what they have found to be the most effective ways of engaging with decision makers.

4.1 Belgium

The following has been informed by a discussion with Rachel De Plaen, researcher on Belgian development policy at CNCD-11.11.11, the National Centre for Development Cooperation, which has 90 member organisations.

What level of engagement has your umbrella had in helping set up PCD and what were the main drivers?

CNCD-11.11.11 and 11.11.11, along with other NGO platforms, has played a major role in promoting and implementing PCD in Belgium. ECDPM references the 2008 annual report on PCD by 11.11.11 as one of the main drivers for PCD.[143] CNCD and 11.11.11 themselves talk about how it has been an integral part of all the issues they work on and notably issues relating to agriculture and food security.

They were also one of the NGO representatives that signed the 2009 agreement with the Minister for Development Cooperation, are regularly involved in Stakeholders Meeting of the Belgian Development Cooperation and the 2012 working group with the Minister that led to the 2013 PCD legislation (see chapter one).

How does your network involve member organisations in PCD work?

CNCD-11.11.11 and 11.11.11 includes PCD in every event on every issue they hold. They find that more organisations are interested if the focus on the issues.

As an umbrella organisation they themselves focus on the mechanisms for PCD and try to raise awareness with members. Smaller organisations leave CNCD-11.11.11 to do advocacy on their behalf with only larger member organisations actually using PCD arguments. They've found that some organisations are just not interested in the mechanisms for PCD and also that for many PCD has only come onto their radar in the last 2-3 years so is still something quite new.

CNCD-11.11.11 and 11.11.11 are working with other thematic and regional platforms including: the decent work platform, food sovereignty platform, Central Africa Platform. The issues, seminars and publications raised by those platforms always include a PCD perspective.

Being involved in the official working group with the development minister was very useful.

In advance of elections, CNCD-11.11.11 and 11.11.11 have worked to get commitments from political parties. They organised a workshop on PCD and the two umbrella organisations issued a paper on PCD.[144] CNCD-11.11.11 & 11.11.11's annual report highlights progress on PCD to members.

CNCD-11.11.11's members through the Coalition Contre La Faim also hosts roundtable meetings with members of parliament from different political parties. These meetings, which last around two hours, focus on a particular thematic issue linked to agriculture in the south, right to food and PCD. Since 2008, they address issues relating to PCD and agriculture. They also have regular one-to-one meetings with parliamentary contacts.

In general, PCD is raised on all work on thematic issues including food sovereignty, climate change, trade, finance, migration, peace and security in Central Africa and the Middle-East.

While still very early days in terms of implementation, PCD can be seen to have played a part in a small change on food speculation.

Work nationally on PCD has also led to increased pressure for action and an EU and international level and some improvements can be seen at these levels.

There have been no unintended negative consequences from PCD policies to date. It might be more the case in the future but the umbrella organisations and their members are used to raising issue on the sales of Belgian arms in developing countries in conflict. In 2011, CNCD-11.11.11's annual report raised the incoherency of the sales of Belgian arms to Libya.[145]

4.2 Finland

The following has been informed by a discussion with Rilli Lappalainen, the Secretary General of Kehys, the Finnish NGDO Platform to the EU.

What level of engagement has your umbrella had in helping set up PCD and what were the main drivers?

There has been a high level of involvement of civil society in the establishment of PCD in Finland. In advance of Finland taking on the Presidency of the EU in 2006, civil society came together with a desire to use that opportunity to make a real impact. PCD was agreed on and they pushed for this to be a major theme of the Finnish Presidency, something that was supported by the then Minister for Foreign Affairs. This was deemed a success and the first ever combined meeting of EU Development and Trade Ministers occurred during the

Presidency. Additionally, 'agreement was reached on the procedures for integrating development issues into Council decision-making and on the drafting of a joint EU "Aid for Trade" strategy in 2007'.[146]

Kehys along with CONCORD and the European Confederation of Relief and Development NGOs held a major conference on policy coherence in October 2006 entitled 'Call for Coherence'. The event was supported by the Ministry for Foreign Affairs, the DPC and EC with 250 delegates including NGO, EC, OECD and ILO representatives. 'The objective was to provide recommendations to the EU via the Finnish Presidency on the integration of climate issues, HIV/AIDS, security, migration, and trade into EU development policy and cooperation.'[147]

How does your network involve member organisations in PCD work?

Rather than asking member organisations whether they are interested in working on PCD specifically, Kehys approached members to ask what issues they wanted to work on. This led to the formation, around ten years ago, of various thematic working groups, including security, migration, climate, food security and gender.

As well as member organisations, working groups also invite participation of ministers, civil servants, academia and journalists. In this way, the working groups themselves represent a coherent way of working.

Agendas for meetings are based on current topics related to each issue that have some PCD link, and are devised by members and the network. In this way, PCD is approached in a much more concrete rather than abstract way. For many members, PCD is not part of their own agenda nor do they have capacity to work on it, though they have given Kehys a clear mandate for PCD.

Involvement of members very much depends on the issue. Some members are involved in all of the thematic working groups whilst others just attend the one most relevant to them. Overall, there is a good level of engagement.

What have you found to be the most effective ways of working with Government and Parliament to secure progress on PCD?

One of the methods Kehys uses to promote PCD more generally to wider audiences is to create and use communication resources to make PCD simpler. For example, they created a short video targeted at people who know nothing about PCD. They have also created training courses and publications to make PCD more accessible. To a certain extent they approach work with parliamentarians in the same way.

During the European Parliament election campaign, Kehys asked all candidates to complete an online questionnaire. While not explicitly referring to PCD each of the issues questions covered related to it. Between 60-70% of candidates completed the questionnaire. Following the election, Kehys also secured the support of 6000 individuals to put pressure on those elected for action on PCD.

Additionally, Kehys relies on the practical examples in the field from its members for its advocacy work in promoting PCD.

Following the successful Food Security Pilot, this could prove to be an area where policy changes. This will not become clear until reports on outcomes from the project are completed. As part of the evaluation and reporting on the pilot, some specific research has also been undertaken on the impacts of Finland's food security policies in Tanzania. The report of this should be published at the end of 2014/early 2015.

There have been no unintended negative consequences from PCD policies to date, however, there are concerns that PCD may be lacking from a recent government initiative. 'Team Finland' was introduced by the current Prime Minister (a former Foreign Trade Minister) primarily to promote Finnish business interests abroad. It makes no public reference to PCD and Kehys is watching carefully to see what impact this promotion is having, aware that in some countries such as Tanzania and Zambia it could have negative consequences if development has not been considered.

4.3 Luxembourg

The following has been informed by a discussion with Christine Dahm, Director of Cercle de Coopération des ONG de développement, the network of development NGOs in Luxembourg.

What level of engagement has your umbrella organisation had in helping set up PCD and what were the main drivers? How does your network involve member organisations in PCD work?

Cercle has been instrumental in pushing for, and helping to establish, PCD in Luxembourg. This is supported by the OECD DAC Peer Review of 2012, which states that:

> 'The Development Cooperation Directorate maintains a regular and open dialogue with NGOs in Luxembourg, represented by the Cercle de Co-opération des ONG. The agenda is prepared through consultation and covers both strategic issues and practical aspects relating to co-financing. Thus, the NGO consultations on the draft law led to a number of changes, such as the inclusion of food security in the specified sectors of intervention and the mention of policy coherence in the mandate of the inter-ministerial committee (Cercle, 2011).'[148]

While having called for PCD for many years, one of Cercle's most influential pieces of PCD work currently is the publication of a report highlighting coherence and incoherence in Luxembourg's policies. This Barometer report was first published in 2012 and then again in 2014.

For Cercle, PCD is the common theme that connects all the different issues their members work on. Cercle members who work on advocacy come together at the Policy Forum

working group. The Policy Forum carries out joint activities on PCD, including the production of the Barometer report, through the Fair Politics website.[149]

Cercle is very clear that it would be unable to work on PCD without the support and engagement of its members. As a platform, they themselves do not have the expertise on the many specific thematic issues that PCD covers. Equally, PCD helps their members to work together and share a common voice as it is an overarching, horizontal theme that relates to them all.

Does this include small organisations/what proportion of their members are interested and engaged?

Only a small number of Cercle members carry out advocacy work and it is these members that engage on PCD through the Policy Forum.

What have you found to be the most effective ways of working with Government and Parliament to secure progress on PCD?

In terms of advocacy, Cercle have concluded that it is important to target efforts at the highest level. While they initially targeted the Department of Development Cooperation, they then moved on to other ministries and now see the Prime Minister and the Parliament as the key targets. In their opinion, there needs to be accountability for PCD at the highest political level. There should be an arbitration solution should a conflict of interest arise between two ministries.

It was noted that the constitution of Luxembourg does not give the Prime Minister any overarching power to decide a dispute between two other ministers (as is the case in Germany). This is something Cercle would like to see changed.

Securing commitments to PCD has been one of the best tools for furthering progress. In advance of the 2013 elections, Cercle lobbied for, and secured, commitments to PCD from all the political parties. As a result of this and additional lobbying, they also secured a commitment to PCD in the new programme for government. It has been important for them to be able to refer to those commitments.

The enabling environment that civil society operates in has also been an important factor. While there may have been little action on PCD to date, parliamentarians and, notably, the chair of the CID actively welcome and encourage input and engagement from civil society.

The only example to date relates to agriculture. As part of the 2012 Barometer report, Cercle highlighted that the "Alliance for a Green Revolution in Africa" (AGRA), created in 2006 by the Gates and Rockefeller Foundations, was increasingly criticised by civil society in Africa and in Europe because its agricultural policies ran counter to sustainable agriculture and food sovereignty. Through this and subsequent discussions with the Minister for Development Cooperation, the government ended its financial support to AGRA.[150]

Beyond this, there have so far been no major changes of policy. While awareness of PCD has increased, action has actually decreased.

There have been no unintended negative consequences from PCD policies to date.

4.4 Netherlands

The following has been informed by a discussion with Evert-Jan Brouwer, Political Advisor for the Woord en Daad Foundation in the Netherlands. As part of the Partos network, the Dutch association for NGOs working in International Development, Woord en Daad has established a civil society working group on PCD. Additional comments were received from Mijke Elbers of Foundation Max van der Stoel.

What level of engagement has your umbrella had in helping set up PCD and what were the main drivers? How does your network involve member organisations in PCD work?

The Partos working group on PCD has only recently formed but members of Partos, particularly the Evert Vermeer Foundation (now renamed the Foundation Max van der Stoel) were instrumental in lobbying for PCD at an early stage.

This working group has brought together Partos members with a variety of different thematic interests to focus on coherence and to hold the government to account over its PCD policies and commitments. Previously, many members worked on PCD through their work on different issues, such as climate justice, tax, migration, trade, and debt justice, but without coordination. The new group is working on a CONCORD style 'Spotlight on Dutch PCD' report that will be published in early 2015.

15 of Partos's 120 member organisations are represented in the new PCD group. This is seen as positive, as all the main organisations that have advocacy capacity are represented. Many of the other 105 organisations are very small, with no capacity for this type of activity.

What have you found to be the most effective ways of working with Government and Parliament to secure progress on PCD?

Strategically, it has worked best to focus on specific issues rather than the concept of PCD. There have been various areas where progress has been made using this strategy, including on tax and migration. On tax, the tax justice network helped secure tax treaty monitoring (see case study in chapter 3). On migration, there was discussion of a pilot scheme on circular migration though this has been hampered by political difficulties and inter-ministrial disagreements.

There have been no unintended negative consequences from PCD policies to date. However, the challenge of ensuring the impacts on development are given as much attention as other, national issues, was raised. It seems in relation to some issues, notably defence and security, that it is hard to promote balance and, from a NGDO perspective, discussions do not always go in the desired direction. Similarly, discussions around the Post-2015 framework are often pitched far too simply as a call for more aid for developing countries.

4.5 Sweden

The following has been informed by a discussion with Peter Sörbom, EU Policy Officer at CONCORD Sweden, the Swedish platform of CONCORD, a European CSO confederation for relief and development.

What level of engagement has your umbrella had in helping set up PCD and what were the main drivers?

CONCORD Sweden was formally mandated to coordinate work on PCD and the PGD in 2009/10. Prior to this other organisations coordinated the work, including the production of the Barometer reports (which started in 2006).

Prior to the establishment of the parliamentary committee that brought about the 2003 PGD, civil society more generally had been pushing for a more holistic response to development issues during the 1990s. They didn't specifically suggest policy coherence however.

Since then, civil society has been very actively involved, not least through the publication of the Barometer reports in parallel to the Government's own reporting.

In October 2013, CONCORD Sweden, along with academia, organised a hearing at parliament to mark the 10 year anniversary of the PGD. This was well received with recognition of the value of PCD for Sweden and commitments were made by all political parties.

CONCORD Sweden also produced an 8-point work plan for a fresh start on PGD - some of which echo the recommendations of the independent Skatskontoret evaluation. They used this in advance of the September 2014 elections to secure supportive statements from six out of the eight political parties.

How does your network involve member organisations in PCD work?

CONCORD Sweden has a working group on PCD/PGD that meets every 2-3 months and covers different thematic issues based on current Swedish policy and linked to developments at the EU level. The work of the group becomes more intensive around the publication of Barometer reports with members encouraged to engage, input and comment. 13 or 14 member organisations, out of CONCORD Sweden's 52, participate in this group.[b] Work between reports is definitely not just the domain of CONCORD's secretariat: around six of the working group members actively meet with civil servants.

Beyond the working group, additional work takes place on specific issues and can bring in some of the wider membership. For example, a specific group was set up to look at security and development over a 12 month period and involved more than just the 14 working group members. Other groups have looked at tax evasion and more recently there have been seminars on migration and development at the request of members.

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[b] Some of these 52 members are umbrella groups in their own right with their own membership.

That said, the most active organisations are definitely the larger ones.

What have you found to be the most effective ways of working with Government and Parliament to secure progress on PCD?

Regular, ongoing, but often informal, dialogue with civil servants has proved to be very useful. Civil servants can often be overworked and grateful for the ideas and contributions from NGOs. This is turn has led to them highlighting the work of NGOs including the Barometer report. When working at an EU level the civil servants see the Swedish NGOs as allies.

Media-focussed activities around the publication of Barometer reports and hosting of panel debates with politicians have also been effective.

One of the lessons learnt has been not to focus all dialogue on the party spokespeople for Development Cooperation. While they are responsible for PGD and often already supportive of it, there is a need to speak to politicians from other fields. This is something that CONCORD Sweden started this year by asking non-Development Cooperation politicians onto their panels during the launch of the 2014 Barometer report.

While there have not been any clear policies resulting from PCD there is a sense that small steps are being made on some issues as a result of PCD work. These include the link between development and climate becoming much clearer and the Swedish Government finally looking at the issues of tax evasion and illicit financial flows.

While not explicitly the result of PCD policies, there are some concerns around Official Development Assistance (ODA) being used on migration policy. While Sweden has a very generous migration policy, the concern is that in arguing all policies impact on development, development budget could come to be used on some of those other policy areas, such as tackling climate change, though it is important to note that this has not happened yet.

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