# Evidence to the Environmental Audit Committee inquiry: Voluntary National Review of UK progress against the Sustainable Development Goals

April 2019

## Scotland's International Development Alliance

1. [Scotland's International Development Alliance](#) (The Alliance) is a membership body in Scotland for over 150 organisations committed to creating a fairer world, free from poverty, injustice and environmental threats. The Alliance works in collaboration with [Bond](#) and [Scotland SDG Network](#) on matters relating to the 2030 Agenda.

2. This response has also been developed based on discussions with members of the [Scotland SDG Network](#), and with support from the [Scottish Council for Voluntary Organisations](#).

## Overview

3. The VNR process was not clearly outlined nor communicated to key stakeholders at the outset in terms of how the UK Government planned to go about meaningful consultation.

4. There is little evidence of effective commitment from other UK Government departments in the VNR process.

5. Overall, the UK Government was too slow to begin and develop its timeline for the VNR process. The process remained unclear for too long to allow for active participation of wider stakeholders, especially in devolved contexts.

6. The VNR should be written from the perspective of ways to improve the implementation of the SDGs in the UK.

7. The Government's Emerging Findings and Future Engagement document has been welcomed, but there are a number of concerns, particularly on the lack of target level analysis of each sustainable development goal and how the data has been selected.

8. The Alliance is not confident that the UK VNR is aligned with the UN guidelines specifically in terms of the stakeholder engagement process, target level analysis and the use of data.

9. Policy Coherence for Sustainable development is both a specific target (17.14), and underpins the entire 2030 Agenda in terms of the stated and explicit interlinkages between all 17 goals. This is therefore a key area and one that is currently missing from the UK approach to the SDGs.

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**Stakeholder engagement in the Voluntary National Review process**

10. Developing a VNR should be an open, inclusive and participatory process that involves all major groups and stakeholders across all levels and sectors of government, business and civil society, according to UN guidelines[1].

11. The UK Government made efforts to gather case studies through an online portal and a social media campaign on SDG related New Year's resolutions. We see these actions as a useful starting point, but they do not ensure the VNR process is inclusive and participatory on their own. Furthermore, a lack of communication with key networks and civil society groups across the UK, particularly in areas of devolved government, meant neither action was as effective as it could have been in fostering an open dialogue between different stakeholders on SDG implementation.

12. The VNR process was also not clearly outlined nor communicated to key stakeholders at the outset in terms of how the Government planned to go about meaningful and participative consultation. This has been particularly true for involving the regions/countries with devolved government and civil society residing within them. It is our belief that a clearly communicated plan to consult and engage with appropriate civil society groups and networks in the three regions/countries with devolved government, such as ourselves, at the very beginning, was a missed opportunity to help build momentum for wider engagement.

13. The UK Government did hold engagement events in both Scotland and Wales, but these came at the request of civil society networks based in those countries, not the other way round, and no follow-up engagement plan was announced. Consultation and engagement of stakeholders by other UK government departments was also delayed and this has limited wider active participation in the VNR process.

14. There is little evidence of effective commitment from other government departments in the VNR process. The team in DFID has shown significant commitment, and although slow to begin with, they have made a real effort to engage with stakeholders, particularly through Bond. Other government departments have not shown this level of initiative from the perspective of members of the Alliance and Scotland's SDG Network.

15. Once the VNR process got underway, communication between DFID and devolved nations has been sufficient, but there remain barriers to making sure cooperation between national, devolved and local government is consistent, effective and systematic. We encourage the development of a more systematic information exchange mechanism that improves both vertical and horizontal policy coordination across and within different levels of government, including the countries with devolved government.

16. Overall, the VNR process has been too slow. This is exemplified by the time-lag between the UK Government announcing their commitment to do a VNR (November 2017), and the first stakeholder engagement event taking place (July 2018). Furthermore, the UK Government was very slow to develop a timeline for its Voluntary National Review (VNR) and to set out its approach for incorporating the contributions of stakeholders. For example, the list of which departments were leading on what goals was only shared in Mid-December, and only one goal-specific stakeholder engagement session, on Goal 16, took place in 2018.

17. The timeline was very unclear and when events did happen it was often with short notice. It was not clear how stakeholder views would be incorporated, beyond drawing on cases studies to illustrate the final VNR report. The process was unclear and not very transparent - particularly from the departmental side, although

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[1] https://sustainabledevelopment.un.org/content/documents/20872VNR_hanbook_2019_Edition_v2.pdf

we do recognize that the DFID SDG team tried to keep channels of communication open with both Bond and UKSSD.

18. There has also been insufficient information on how the government has prioritised reaching out to marginalised and vulnerable groups. We are not aware that departments have had in place strategies or targeting approaches to ensure voices from marginalised groups are included in the VNR. Consultation of such groups requires more innovative and relevant engagement mechanisms than portals and conventional consultation.

19. For future VNRs, there needs to be a much more transparent road-map for its development, including clear and meaningful opportunities for consultation – either online or through consultation meetings – well signposted from the outset. In Scotland, there have been too few workshops with stakeholders on specific goals, and on the important themes, such as the Leave No One Behind (LNOB) agenda.

## UN Guidelines for VNRs

20. It is vital that the VNR should be written from the perspective of how to improve the implementation of the SDGs. UN Guidelines for the VNRs set out that "the process of carrying out the voluntary national review should not be seen as separate from implementation of the SDGs. Rather than an end in itself, the VNR is a process by which countries take stock of and assess progress – and shortcomings - in implementation of the goals and targets."[2]

21. The Scottish Government has approached the VNR in this way, and has explicitly stated its intention to use the VNR to formulate an SDG implementation plan. This is possible partly because leadership on the VNR process lies within the same team that has the lead role on SDG implementation domestically in Scotland. This is not the case at UK level, and is why we believe the Cabinet Office is the natural home for both the VNR and a UK wide SDG implementation plan.

22. Nonetheless, the UK Government should be developing its implementation plan for the Goals, beyond Single Departmental plans that looks across all Goals and targets. There is no indication that this is being done.

23. The UN Guidelines set out that a VNR should:
    a. Track progress in implementing the Goals and targets - including means of implementing them – in a manner which respects their universal, integrated and interrelated nature and the three dimensions of sustainable development
    b. Identify achievements, challenges, gaps and critical success factors to support policy making, - including the resources and partnerships that are needed
    c. Be open, inclusive, participatory and transparent and will support reporting by all relevant stakeholders
    d. Be people-centred, gender-sensitive, respect human rights and have a particular focus on the poorest, most vulnerable and those furthest behind

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[2] https://sustainabledevelopment.un.org/content/documents/17346Updated_Voluntary_Guidelines.pdf

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    e.   Build on existing platforms and processes

    f.   Be rigorous and based on evidence, - including disaggregated data

24. The Alliance is not confident that the UK VNR is aligned with the UN guidelines as laid out above. However, the final VNR is yet to be published, so we cannot give a definitive answer as to whether the UN Guidelines have been met. However, as already pointed out we can be sure that the stakeholder process (point c above) has not been ideal. We are also concerned that the final report may not look at the target level (point a), nor significant focus on gaps (point b) and from the initial Emerging Findings and Future Engagement document we have concerns about the use of data (point f).

## The Government's Emerging Findings and Future Engagement (EFFE) document

25. As an active member of the Bond SDG Steering group, the Alliance supports and endorses the analysis and response undertaken by UKSSD and Bond[3] in relation to the EFFE document. We highlight particularly important recommendations how the document could be improved below.

26. There must be target level analysis of progress towards each sustainable development goal. The information presented under each section does not adequately show how it relates to the Sustainable Development Goal (SDG) targets.

27. Policy Coherence for Sustainable development is both a specific target (17.14), and underpins the entire 2030 Agenda in terms of the stated and explicit interlinkages between all 17 goals. This is therefore a key area and one that is currently missing. An assessment of the procedures, structures and responsibilities for ensuring coherence between different areas of the goals and between international and domestic policy is of fundamental importance. The UK must go beyond simply recognising interlinkages by taking advantage of potential synergies while explicitly aiming to avoid trade-offs when possible. This avoids delivering on some areas of the goals at the expense of others.

28. It is positive that the EFFE document includes both cross-cutting themes and Goal specific information. However, there is no explanation of why certain interlinkages across the framework are highlighted in each chapter and some are not. In addition, there is much analysis on the existence of interlinkages, but it is critical to note how these interlinkages work in the UK context and how they will be used to promote implementation - this analysis was missing.

29. The data presented should be more systematically chosen and explained. There is no explanation of how the data in the EFFE was selected and why certain data and statistics were emphasised over others. In the EFFE, the data picture provides a very selective and ad-hoc overview of where progress has occurred, failing to identify areas where significant improvement is still necessary. Nor does the EFFE adequately lay out

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https://www.bond.org.uk/sites/default/files/bond_sdg_group_and_ukssd_recommendations_for_developing_the_uk_vnr_2019.pdf

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disaggregated data. It does not for example build on existing data presented in the UKSSD Measuring Up report.

30. The Leave No One Behind (LNOB) principle is central to the SDGs and this principle was championed during the creation of the SDGs by the UK Government. In the EFFE document, LNOB has been largely overlooked.

31. The EFFE emphasises the need to work in partnership, but does not indicate how the Government is taking forward its responsibilities for enabling and supporting partnerships for the SDGs, including at sub-national levels.

32. It is important that international progress on each goal is mentioned, but it should be weighted more towards domestic progress. Currently, the information is weighted evenly between domestic and international policy.

## Recommendations for the final VNR submission

33. The VNR should not only present details of how the 2030 Agenda is being implemented across different sectors. It should allow for the sharing of experiences, including successes, challenges, gaps and lessons learned. It should also commit to a follow up VNR.

34. The UK Government has been clear that it is committed to delivering an honest VNR that outlines challenges and gaps, as well as successes. If the VNR is truly self-reflective, it will need to acknowledge significant gaps and the fact that the UK lags behind many other countries in measuring delivery of the SDGs. Examples of such gaps include domestic poverty rates and fossil fuel dependency.

35. To ensure that the UK meets the universality expectations of the 2030 Agenda, the UK Government should commit to an effective whole of government approach to the SDGs. This means leadership from Prime Minister level with coordination through the Cabinet Office. All UK Government departments need to uphold their responsibility to implement the SDGs.

36. The VNR also presents an opportunity for long-term engagement with stakeholders on the implementation of the SDGs. Therefore, the UK Government should develop an inclusive and far-reaching SDG delivery plan. It should be noted that Single Departmental Plans, however well aligned to SDGs, do not constitute a UK SDG delivery plan.

37. This plan should:

- Cover all 169 targets
- Provide a clear framework and system for policy coherence for the delivery of the agenda domestically and in the UK's international engagement
- Identify clear responsibilities for government departments in delivering the SDGs
- Include an analysis of resourcing for the delivery of the SDGs and outline how resource gaps will be filled
- Include a clear communications strategy
- Have a monitoring and review mechanism

38. Along with a commitment to do a second VNR, it is vital that the UK Government commit to refining VNR process. In future it should aim to:

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- Review progress against all 169 targets and consider interlinkages between the goals, identify accelerators and develop plans to take them forward;
- Look at lessons from other countries, including the countries and regions within the UK with devolved government; Scotland and Wales both have different and progressive approaches to delivering and tracking the SDGs and their experiences should be incorporated throughout the report;
- Review existing international comparisons in some sectors, which do measure all countries of the world using the same methodology, and treating all equally – one such example is the Global Atlas of Palliative Care at the End of Life;
- Focus on both domestic delivery and the UK's global impact on SDGs through ODA and its footprint e.g. trade, consumption and environmental footprints;
- Engage stakeholders systematically and inclusively; to do this properly requires a clear methodology, budget and time.

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