

16 June 2014

Dear Commissioners Piebalgs and Potočník

CONCORD-Beyond 2015 European Task Force (ETF) would like to congratulate you on the new Communication *"A Decent life for all: from vision to collective action"*. We are pleased to see another joint Communication that addresses both poverty and environmental sustainability. Further, we support the **call for a universal agenda which is integrated and transformative** and that also **addresses "new" challenges** above and beyond the three dimensions of sustainable development in their strict sense. We emphasize that these challenges must include **democratic governance, tackling inequalities and ensuring peaceful and stable societies for all**. The EU has an important role to play in stressing these key issues and in promoting a root cause approach. In particular, the EU must show how it is ready to respond to the principle of a universal framework and address all of the goal areas domestically as well as in its external action.

We are pleased to see that the Communication underlines that the future framework must be **"rights-based and people centred"**. In line with that, we fully support the EC's recognition that accountability, transparency and effective review are fundamental requirements. The new framework does indeed present an opportunity to develop a rigorous and effective global accountability mechanism directed at both governments and other actors. Furthermore, in a rights-based framework, **people's empowerment and their active and meaningful participation must be placed at the centre**: they are key to the success of the future framework. We would not, however, wish to see human rights confined to any one goal area as they must underpin the whole framework.

The ETF hopes that the EC will support the assertion that *"the EU remains committed to ensuring increased Policy Coherence for Development"* (PCD) during the upcoming negotiations. The EU should promote the importance of ensuring policy coherence with all partners, urging them to agree to review their policies to achieve consistency with global poverty reduction and *sustainable* development objectives. PCD would be a key enabler of success within the means of implementation.

While fully supporting the Commission in the points highlighted above, the ETF considers that the rhetoric on these points is not fully carried through in some of the proposals, making it difficult to move from vision to collective action. We offer the following recommendations in the hope that they will be considered in the future EU common position:

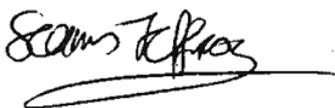
- The Commission's definition of universality remains slightly ambiguous. It is not clear from the Communication whether the EC supports all countries making changes in their own contexts on each and every goal area – this would be the strict and ideal definition of a universal framework, preventing any possible 'opt out' decisions. As regards **differentiation** within a universal framework, is not clear how the EC 'proposal' for responding to different country contexts would operate in practice, especially when the Communication clearly limits the principle of Common but Differentiated Responsibility (CbDR) to the environmental domain. How will it be possible to define the EU's *responsibility* for example in the realm of the economy and governance?
- **There is a disappointing lack of focus on the actions that rich countries should take across most of the priority areas**, but especially in those linked to social policy, or human development. If the EU is to be taken seriously in the negotiations, it must come with clear ideas about transformational changes that the EU and other higher income countries should commit to undertake. To cite a few examples:
  - **Poverty**: we welcome the EC's implicit recognition that the \$1.25/day international poverty line is inappropriate nowadays. Unfortunately, the ETF believes it is far too unambitious only to aim to "reduce" the number of people living on \$2/day. Poverty under \$2/day should be entirely eradicated and this should be considered a minimum for a future 'poverty goal'. Furthermore, if poverty and inequality are to be tackled comprehensively, the EC should also look to propose measures to reduce extreme wealth and not just extreme poverty.
  - **Inequality**: this cannot be tackled without redistribution through strengthened tax systems (including addressing corporate tax payments and illicit financial flows). This is not only necessary for

creating an enabling environment for companies, but most importantly for governments to be able to offer quality services for their people and for differences in wealth to be addressed.

- **Food security, nutrition and sustainable agriculture:** it is regrettable that no strong recommendations are made regarding the need to eliminate harmful agricultural subsidies, to end speculation on commodities or to shorten supply chains.
- **Sustainable Consumption and Production (SCP):** the Communication focuses exclusively on rendering current consumption patterns and levels acceptable. However, measures are needed to ensure responsible consumption and production patterns with clearer commitment to the need to change lifestyles and reduce consumption. Responsible consumption and production in turn implies an absolute *decoupling of resource use and economic activities*, and a firm commitment to the concept of “planetary boundaries”.
- The Communication states the EC aims to “*integrate the three dimensions of sustainable development (social, environmental and economic) in a balanced way*”. That ‘balanced’ approach is not clearly evident. For example, it is disappointing that there is little which challenges current **economic paradigms** which do not operate in the interest of poor or marginalised people. The current narrative in this regard remains far from transformative and instead confirms a “business as usual” approach.
- The ‘priority area approach’ in the Communication **does not sufficiently demonstrate integration**, rather tending to be silo-based. It would benefit from the three dimensions of sustainable development being addressed in each goal area. For example, it is not clear how the EC intends for climate change, reducing the carbon footprint, or ensuring we live within the ecological carrying capacity of the planet to be integrated as cross-cutting issues in all goal areas.
- The Communication falls short of taking a **Human Rights Based Approach (HRBA)**. Ensuring a HRBA across all parts of the framework is key to a transformative agenda which tackles the root causes of poverty and inequality. There is little to ensure that people’s influence over decisions which concern them is improved, there are few proposals specifically or clearly focusing on improving the situation of marginalised and excluded groups and all goals should be framed as ‘zero goals’ in the area of human development, if no one is to be left behind.
- Though we fully agree that the future framework has to be one of **global partnership**, we would be very reluctant to see the EC propose that this should rely on a separate goal being created. This would likely be a replication of the highly unsuccessful MDG 8 and a recipe for failure. A universal framework must imply a global partnership in all goal areas.
- Finally, we encourage the Commission to maintain its position regarding the need to strengthen current **accountability mechanisms** and to put in place new mechanisms where necessary. Rigorous, independent mechanisms will be needed which clearly encompass the ‘who’, the ‘for what’ and the ‘how’ of accountability. This will require the establishment of legitimate and adequate systems of responsibility, accountability and transparency which apply to all countries and all actors including the corporate sector. Such systems must support the progressive realisation of human rights and equitable, sustainable development for all. We hope that the EU will take the lead in seizing this opportunity to address the responsibilities and accountability of all actors.

We thank you for your long-standing commitment to these very important issues.

With our very best regards,



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