"MORE AND BETTER EUROPE" CAPACITY BUILDING TOOL KIT

Strengthening Italian NGOs and CSOs capacity to participate in the Policy Coherence for Development and in the Post-2015 Debates

SECTION 1 - Policy Coherence for Development

In occasion of the Italian Semester of Presidency of the European Union in 2014
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Capacity Building Toolkit

An output of the project “More and better Europe”

A project by CONCORD Italia, in partnership with Oxfam Italia, ARCI-ARCS, CIPSI, GVC, FOCSIV and the associates Terra Nuova, Legambiente, Slow Food, Expo dei Popoli, Action Aid, co-funded by the European Union and the Italian Italian Ministry of Foreign Affairs and International Cooperation (MAECI)

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About The Project “More and better Europe”

“More and Better Europe” is a project aiming to ensure that the Italian Presidency of the European Union (EU) in the second semester of 2014 delivers a better EU framework to combat global poverty and inequality. It is composed by the projects:

- “More and better Europe – Ensuring Italian contribution to enhance EU role as a global and consistent player on sustainable development issues” (Project n. DCI-NSA/2013/334-175) co-funded by the European Union
- “Più Cooperazione in Europa. Più Europa nella Cooperazione. Il contributo delle ONG all’agenda per lo sviluppo del semestre di Presidenza italiana” (Project n. AID 10245/OXFAM/ITA) co-funded by the Italian Ministry of Foreign Affairs and International Cooperation (MAECI)

The project “More and Better Europe” has been conceived and will be carried out by the Applicant Oxfam Italia, the co-Applicants ARCI-ARCS, CIPSI, GVC and FOCSIV and the associates Terra Nuova, Legambiente, Slow Food, Expo dei Popoli, Action Aid, within the framework of their common membership to the informal network of CONCORD Italia, the Italian national platform of CONCORD Europe, the European Confederation regrouping 42 members, 1,800 NGOs and associations operating in the spheres of development, humanitarian aid and global citizenship education.
About CONCORD Italia

CONCORD Italia forms part of the European confederation CONCORD, which represents, through its 42 members, including national platforms and international networks, 1,800 NGOs and associations operating in the spheres of development, humanitarian aid and global citizenship education. As a united and plural national platform, CONCORD Italia represents the main NGOs in our country operating at a European level, in the spheres of development, humanitarian aid, sustainable development, global citizenship education, awareness building and mobilisation of the general public, through programmes, projects and campaigns. CONCORD Italia represents the stances, demands, and proposals of the CONCORD Confederation in relations with European Institutions, the European Commission and Parliament and with Italian government, ministries and Parliament. CONCORD Italia also promotes the dissemination in Italy of information, documents, viewpoints, reports and advocacy initiatives promoted by CONCORD Europe.

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About GVC

GVC- Civil Volunteer Group, is a non-governmental, secular, and independent organization, founded in Bologna in 1971. We are active in international development aid projects with complex action strategies: from humanitarian aid to populations suffering from conflicts and natural disasters to reconstruction, hygiene, and food security; from rural development to education, to the protection of women’s and children’s rights. In over forty years of activity, GVC has operated in all parts of the world, carrying out thousands of projects. We collaborate with public institutions, cultural associations, cooperatives, and Italian and European NGOs, organizing seminars, conferences, exhibits and festivals, laboratories in school and training courses for teachers. We produce educational materials and carry out communication activities on sensitive issues such as differences, human rights, women’s issues, sustainable trade, and biodiversity.

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About this Toolkit

In the second semester of 2014 Italy will assume the Presidency of the European Union and, for the first time since the beginning of the financial and Eurozone debt crisis in 2008, our country will be called to lead on advancing the EU agenda on a number of specific issues, including development policies.

The project “More and better Europe” aims to ensure that the Italian Presidency of the European Union (EU) in the second semester of 2014 delivers a better EU framework to combat global poverty and inequality.

This Toolkit has been created with this objective in mind and it represents an useful instrument enabling members, volunteers and activists of the NGOs and CSOs coalitions and platforms active on the global development agenda to increase their skills to participate into the Italian and EU policy debate, to better mobilize their constituency, to raise and multiply awareness among a wider public and to advance the political debate on specific themes of interests that will be addressed in the Italian presidency, such as the Post-2015 framework or the EU policy coherence framework.

We encourage use of the materials released within the project: feel free to copy this Toolkit, make it available on your webpage, or distribute through any other means - as long as no fee is charged to users. If you excerpt or quote material, please make reference to the original source. If you adapt the material, please note that it was adapted from the material you find in the bibliography.

The views expressed in this document solely reflect the opinions of the authors and collaborators.
Introduction

This Toolkit has been created within the framework of the “More and better Europe” project funded by the European Union and by the Italian Ministry of Foreign Affairs and International Cooperation (MAECI), and promoted by CONCORD ITALIA1 by some of its members2. The project relies on the proactive participation of CONCORD ITALIA’s constituency, thanks to whom the involvement of main Italian Non Governmental Development Organizations (NGDOs) and their networks (AOI, LINK2007, CINI), as well as the participation of other Italian Civil Society Organizations (CSOs), ensures an Italian contribution in enhancing the EU’s role as a continuous global player in combating global poverty and inequality in a sustainable development framework.

This Toolkit, elaborated by GVC with the support of CONCORD ITALIA partners, includes material helping the Italian NGOs and CSOs taking part in the global processes for the Italian Presidency of the European Union and in advocacy activities to both raise awareness among the Italian public and increase their influence addressing EU and Italian policy makers (including Local Authorities). The Toolkit is divided into two sections:

• The first section focuses on Policy Coherence for Development (PCD), in particular within the European context, analysing how PCD is implemented in the European Union — with a focus on the Italian situation — in order to understand what role Italian NGOs and CSOs can play in this scenario.

• The second section focuses on the Post-2015 agenda, first looking at the structure, strengths and weaknesses of the current framework, then analysing the different processes and actors that are participating in the definition of the new Post-2015 development agenda — in order to understand the opportunities that Italian NGOs and CSOs can have in influencing this discussion.

In order to facilitate the work of the NGOs and CSOs, the two sections composing this Toolkit have been published in two separate documents. The following pages set up SECTION 1: POLICY COHERENCE FOR DEVELOPMENT.

The suggestions and recommendations expressed in this document mainly reflect CONCORD’s point of view, the European Confederation of Relief and Development NGOs. The main effort of this Toolkit consists in providing the trainers and staff of NGOs and CSOs with a well thought out guide of the most relevant aspects discussed in publications and websites concerning the two topics in order to provide an overview of the main issues.

Specific paragraphs about the Italian scenario are included to provide practical information that might be useful to NGOs/CSOs, enabling greater participation.

References and essential bibliography included address the user who wants to examine the different themes in depth.

Finally two training packages, useful pedagogical tools to transfer knowledge to trainers and NGOs/CSOs staff are included:

• on PCD: “Good Practices guide on Policy Coherence for Development (PDC) for Concord Members” (see enclosed training tool n.1) and “Policy Coherence for Development Training” for trainers (handbook and slides) issued by CONCORD (see enclosed training tools n.2 and 3);

• on POST-2015: “The Post-2015 Agenda — Training of Trainers”, developed by GVC and CONCORD Italia to synthesize the focal points of section 2 of this Toolkit (see enclosed training tool n.4) and the “Advocacy Toolkit – Influencing the Post-2015 development agenda” output of the Sustainable Development 2015 (SD2015) programme, a multi-stakeholder engagement programme run by Stakeholder Forum and CIVICUS, in collaboration with UN DESA (see enclosed training tool n.5).

1 CONCORD is the European Confederation of Relief and Development NGOs. It consists of 27 national associations, 17 international networks and 2 associate members that represent over 1,800 NGOs. It was founded in 2003 by development NGOs to act as the main partner for discussion with the EU institutions on development policy. CONCORD ITALIA is the Italian national platform of CONCORD Europe whose members are many of the main Italian NGDOs working with the EU. You can find more information about CONCORD at: http://www.concordeurope.org/about-us/#sthash.9i905b35.dpuf

2 Oxfam Italia, CVC, ARCS, CIPSI, FOCSIV.
SECTION 1

POLICY COHERENCE FOR DEVELOPMENT
1. WHAT IS PCD?

1.1 Definition

Policy coherence for development is an approach and a tool for integrating the economic, social, environmental and governance dimensions of sustainable development at all stages of domestic and international policy making, as stated by the OECD. Its main objectives are to address the negative spillovers of domestic policies on long-term development prospects, to increase governments’ capacities to identify trade-offs and reconcile domestic policy objectives with internationally agreed objectives, and to foster synergies across economic, social and environmental policy areas to support sustainable development.

The concept of Policy Coherence for Development (PCD) emerged in the international discourse in the early 1990s, in a context of increasing global challenges and growing concerns as to the effectiveness of aid. PCD is not just required at the international level, but also at the European and national levels as well. Policy coherence issues arise between different types of public policies (for example those relating to employment, health, security, development), between different levels of government, and between different stakeholders. The first European commitment to PCD emerged from the European Consensus on Development in 2005, but it was with article 208 of the Lisbon Treaty that PCD became an obligation within the European Union – see Box 1.

Although the European Union (EU) has worked towards stricter arms export controls, it fails to prevent irresponsible arms flows from entering conflict zones in developing countries. This clearly leads to incoherence between the EU’s trading policy and its development policy: on the one hand, as a major arms exporter, the EU exports or facilitates the trans-shipment of arms from its territory. On the other hand, however, the EU is a major donor to poor and (post-) conflict countries. This is clearly incoherent.

Source: EVF 2007 Policy Coherence for Development Practical Guide

Joint declaration signed in 2005 by the Council and the representatives of the governments of the Member States meeting within the Council, the European Parliament and the Commission on the development policy of the European Union. It defined the framework of common principles within which the EU and each of its Member States have to implement development policies in a spirit of complementarity.
There is no single agreed definition of PCD. According to the European Commission “it is widely accepted that it means that, in pursuing their domestic policy objectives, governments should, at a minimum, avoid negative consequences and spillovers which would adversely affect the development prospects of poor countries (do no harm).” More positively, PCD also means that, when formulating domestic policies, governments should actively look for ways to exploit the potential for positive spillovers and build synergies between different policies to benefit developing countries 4.

From CONCORD’s perspective, Article 208 of the Lisbon Treaty also implies that “all EU policies must support the development of developing countries, or at least not conflict with the EU’s objectives for international development, centred on the eradication of poverty 5.”

1.2 Why is PCD important?

Coherence is about ensuring that the external impact of EU policies do not undermine the aims and objectives of EU development cooperation. Therefore, improving coherence is important to ensure the effective use of resources, good governance, and for the credibility of the EU in general. The EU is undermined by incoherencies that derive from pursuing policies that have particular goals and at the same time by adopting others which contradict those same goals.

PCD aims to create a global environment that enables developing countries to integrate and thereby accelerate their internal development processes. Together with development policy and effective aid, PCD is considered to be a significant and complementary instrument that has an important impact on sustainable development, poverty eradication and respect for human rights. The need for PCD is even greater given the context marked by the blurring of boundaries between domestic and foreign policy due to globalisation and by policy-makers that can no longer ignore the impact of their choices at a global level. Incoherent policies also produce a waste of development money and high costs for the transition to a sustainable global economy.

As CONCORD underlines 6, the need to rethink the relationship between rich and poorer countries has emerged, together with the need for cooperation to address the structural causes of poverty and marginalisation, rather than simply focusing on the deployment of development aid in a donor-recipient relationship.

The importance of PCD and its role in the more efficient use of public money should be widely communicated to the global public and in governance fora to enable political debate.

In this framework, the importance of PCD has also been emphasized by the EU “Agenda for Change” 7, the main guiding policy document for development cooperation instruments of the EU and the programming cycle of EU aid, presented in October 2011.

The agenda affirms the European Union’s will to strengthen the country-level dialogue on PCD and to continue to promote PCD in global fora to help foster an environment that supports the poorest countries’ efforts.

The document also deals with another important subject, the effective use of resources – an issue already at the centre of international debates 8 - recognising that the current difficult economic and budgetary times make it even more critical to ensure that aid is spent effectively.

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5 Concord Europe (2013), Spotlight on Policy Coherence for Development, Report 2013, pag. 7
6 See Concord Denmark (2012), Delivering Results- How Denmark can lead the way for Policy Coherence for Development, Copenhagen, Concord Denmark
7 On October 13th, 2011 the EU Commission presented its Agenda for Change of EU Development policy and a new policy for EU budget support. These communications set out a more strategic EU approach to reducing poverty, based on a more targeted allocation of funding. It states that EU spending should concentrate on sectors which are key for long-term and inclusive growth, target countries that are in the greatest need of external support and where aid can make a difference. For more information you can find the document at http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0637:FIN:EN:PDF
that it delivers the best possible results, and that it is used to leverage further financing for development. Thus, the Agenda acknowledges that differentiated development partnerships, coordinated EU action, and improved coherence among EU policies are key to achieving maximum impact and value for money.

Moreover, the document encourages the EU to define the most appropriate form of cooperation through comprehensive political and policy dialogue with all partner countries. This would lead to informed and objective decisions on the most effective policy mix, aid levels, aid arrangements, the use of new and existing financial tools, and would build on the EU’s own experience in managing transition. This pushes towards national ownership both at the state and local levels, so as to secure stability and meet basic needs in the short term, while at the same time strengthening governance, capacity and economic growth, while keeping state-building as a central element. Policy coherence for development will also be pivotal for the definition of a new development agenda that will be set up in 2015, when the Millennium Development Goals will expire - see Box 2.

**BOX 2 - FOCUS ON:**
**POLICY COHERENCE FOR (SUSTAINABLE) DEVELOPMENT BEYOND 2015**

PCD will be fundamental to the success of the future framework that will replace the Millennium Development Goals (MDGs) in 2015, and it will be a key enabler of progress, not least because the negative effects of a policy or practice generally hit the poorest and most marginalised people on the planet hardest, despite their holding no responsibility for those policies.

PCD potentially addresses this critical global “accountability gap” more than any other policy instrument by stressing that all decision-making processes by all actors – be they public or private, in the North or South - must be responsive to the needs and aspirations of the world’s poorest and most marginalised people and must ‘do no harm’ to their human rights and development perspectives.

Ensuring policy coherence across key sectors to support the revision of the Millennium Development Goals (MDGs) and the definition process of the Sustainable Development Goals (SDGs) will avoid generating further costs and undermining investments through the negative effects of incompatible and harmful policies – see Section 2 of this Toolkit.

The current global governance system lacks the basic capacity to handle and redress unfair policies which may result in one actor’s decisions or actions undermining the sustainable development paths of a group of people, a country or a region. If the Post-2015 framework is to be successful, governments, multi- and transnational businesses and other actors must be called upon to put robust mechanisms that improve the respect and monitoring of PCD in place, as well as mechanisms for dealing with violations of the principle of ‘do no harm’ which underpins PCD.

An example of such instruments, as CONCORD points out, is the adoption of guidelines for proper PCD institutional mechanisms that are consistent with the objectives of the Post-2015 framework, such as ex-ante and ex-post impact assessments to determine the PCD compliance of policies and redress mechanisms that allow third countries to ask for a review of the incoherent policies that damage them.

EU 2013 Council Conclusions refer to the Post-2015 framework, stating that continued efforts and political will are needed to anchor PCD more strongly in areas beyond external action and in on-going debates on global issues and challenges, including the discussions about a Post-2015 framework, with a view to mainstreaming PCD in policy formulation and development processes beyond 2015.

According to the OECD, PCD has great potential as a global tool for creating the enabling environments and policy processes required by the Post-2015 framework. It is thus necessary to adopt a broader approach to PCD that includes:

- **Collective action, common but differentiated responsibilities and mutual benefits;**
- **Multiple levels of coherence** (global, regional, national – including advanced, emerging and developing countries);
- **Multi-stakeholder involvement** and inclusive policy dialogue, involving civil society organizations and the private sector;
- Focus on fostering positive synergies among policies and across sectors.

1.3 Intervening with PCD in different sectors

PCD’s practical implementation concerns different areas of activity, as some thematic policies can either support or act against development policies. Therefore, specific research is crucial in order to determine the potential impact of development policies.

Certain key issues – such as financing for development, food and nutrition security, climate change and natural resources, human security and migration - have already been studied and analysed by NGOs to determine their impact on development - see CONCORD Spotlight 2013 and 2011 Reports.

This paragraph briefly recaps the findings of these studies, in particular the central themes of the project “More and Better Europe” that have been developed within this Toolkit: Financing Flows for Development, Food and Development, Trade and Development, Migration and Development.

1.3.1 Financing Flows for Development

Financing for development covers many different flows: domestic financial resources, international resources such as development assistance, innovative sources of financing, foreign direct investments and other private flows, external debt, etc.

For developing and developed countries alike, domestic resources such as taxation are by far the largest source of revenue for financing economic and social development, including public services. Furthermore, public sources of financing in general tend to be more predictable and stable, and have the potential to target the poorest and most vulnerable in society in a way that private flows cannot. Plus taxation has proved to be crucial for reaching the Millennium Development Goals. In addition, the mobilisation of domestic resources also represents a step forward in implementing the country ownership principle.

Yet taxation is not a shortcut to development: success depends on political leaders making a long-term commitment to expanding the tax base and developing transparent fiscal systems that ensure progressive collection and redistribution and a focus on gender-responsive policies – even if this means challenging powerful political interests.

The EU is a key actor in financing for development, it is home to many transnational companies with a globally significant financial sector, it is the biggest provider of Official Development Assistance (ODA) in the world, and a major exporter and importer from the global south.

A number of EU policies have a positive or negative impact on the financial flows to and from developing countries. While on the one hand EU aid plays a crucial role in supporting developing countries, at the same time there are a number of other EU policies, not related to development, that actually facilitate illicit financial flows, and the result of this incoherence is that developing countries are unable to raise sufficient domestic resources to finance their development.
PCD IN PRACTICE: FINANCING FLOWS FOR DEVELOPMENT

Criticism

In mobilising enough resources to finance their development, developing countries often face a number of barriers, largely because of tax dodging by transnational companies that take advantage of inadequate international regulation. Effective levels of taxation in relation to GDP are far lower in developing countries than in the developed world (18% average in sub-Saharan Africa, compared to around 38% in Europe). Between USD 859 billion and USD 1,138 billion escaped developing countries as illicit financial flows in 2010 alone. Approximately half this money (USD 429.5 to USD 569 billion) represents profit-shifting by transnational companies, resulting in a loss to developing countries of at least USD 100 billion a year in tax revenue.

Recent research also shows that just under one in every two dollars of large corporate investment in developing countries is now being routed from or through a tax haven. If these illicit financial flows were taxed, instead of escaping developing countries, they would generate at least as many resources for a country as the aid it receives. This resource loss leaves countries unable to finance universal access to essential social rights for their citizens. The size of the illicit outflows of resources from developing countries – at least half of which is caused by corporate tax dodging – is about the same as that of all the external inflows combined.

CONCORD suggests:

- Implement the May 2013 European Council Conclusions on taxation: at the European Summit in May 2013, Heads of State and Government called for “effective steps to fight tax evasion and tax fraud” and, in particular, the implementation of the European Commission’s Action Plan and its two recommendations. While properly implementing the measures necessary for clamping down on tax havens and tax evasion, the EU institutions must incorporate developing countries’ needs into their new fiscal policies to a much greater extent than they have done with current policies;

- Support of a global regime of multilateral automatic information exchange: the European Council’s decision to make the automatic exchange of tax information the new European and international standard shows the EU’s willingness to play a leading role in the OECD, G8 and G20 discussions on this matter. However, the EU should extend this system to the developing world in order to promote lasting change, providing assistance to strengthen developing countries’ tax authorities and enable them to implement this regime efficiently. In the meantime, developing countries should be permitted to access the information stream without a requirement for full immediate reciprocation. Importantly, tax havens need to sign up to this multilateral system, and the EU should decide on counter measures for responding to any jurisdictions that do not join;

- Make it mandatory for transnational companies in all sectors to adopt country-by-country reporting: the EU already adopted a similar system for the EU’s banking industry. This will require companies to give a full picture of their actual economic performance, including figures for all of their subsidiaries, for every country in which they trade. This would allow revenue authorities in both developed and developing countries to detect suspicious transactions, and would help them collect more revenue to finance their public services. The EU should introduce a binding definition of tax havens, and impose effective sanctions for non-compliance with EU tax standards. They would include being banned from accessing aid or public procurement, as called for by the European Economic and Social Committee;
**FINANCING FLOWS FOR DEVELOPMENT**

**CRITICISM**
- Tax dodging by transnational companies;
- Illicit financial flows not taxed escaping developing countries

**CONCORD’S SUGGESTIONS**
- Implementation of the May 2013 European Council Conclusions on taxation and EC’s Action Plan;
- Support of a global regime of multilateral automatic information exchange;
- Introduction of country-by-country reporting for transnational companies;
- Implementation of the EU Anti-Money Laundering Directive;
- Definition of tax crime as a serious offence connected to money laundering.

Financial Flows for Development is one of the main topics at the centre of the project “MORE AND BETTER EUROPE” that CONCORD Italia is implementing for the Italian Presidency of the EU. A specific publication on PCD will be dedicated to this subject, and will be coupled with seminars and advocacy events.

The project creates an excellent opportunity to discuss, inform, raise awareness and advocate for stronger commitments and practices in the field of finance that do not harm global development. Materials will be available on CONCORD Italia website: [http://www.concorditalia.org](http://www.concorditalia.org).

Source: CONCORD’s 2013 Spotlight Report on Policy Coherence for Development
1.3.2 Food and Development

Agricultural investment is high on the agenda of several international fora and processes in which the EU or groups of Member States are involved, including the G8 and the Committee on World Food Security, with a special focus on biofuels, smallholder investment and the process of defining principles for responsible agricultural investment (rai).

This presents an opportunity to make policies that impact agricultural investment more coherent with food security and fighting hunger. The EU has recently been prioritising food and nutrition security as one of its international development objectives. One of the four priorities of the EU’s 2010 Food Security Policy Framework (FSPF) is to improve smallholders’ resilience and their livelihoods as a means of improving food security in developing countries.

In the implementation plan adopted by the Council in May 2013 to translate the policy commitments into concrete actions, the EU has detailed the initiatives that will comply with the FSPF commitments. The EU Communication on nutrition adopted in March 2013 contains strong commitments both to ensuring coherence between EU policies that have an impact on food and nutrition security (by tackling nutrition through a multi-sector approach), and to supporting smallholder agriculture.

Moreover, the Common Agricultural Policy (CAP), the agriculture policy of the EU, aims to safeguard farmers’ incomes, to ensure a stable, safe and affordable food supply to European consumers, and to support the provision of public goods such as the environment. As the world’s largest importer, and the second largest exporter of agricultural commodities, the EU’s agricultural policies and instruments have a significant effect on world food prices and agricultural development in developing countries.

PCD IN PRACTICE: FOOD AND DEVELOPMENT

Criticism

Despite some progress and the fact that there is enough food for everyone, every night 842 million people go to bed hungry, and malnutrition causes the death of 3.1 million children every year, accounting for 45% of all deaths among children under the age of five. Huge tracts of land are diverted from food to energy production and 30 to 50% of food is wasted globally while governments still fail to live up their commitment to agriculture.

Smallholders are recognised, by the EU among others, as the single most efficient channel for increasing the availability of food while preserving the environment in developing countries. They represent the largest group of investors in the agriculture sector, yet they remain neglected by current public and investment policies. Meanwhile, the food sector is increasingly dominated by large corporations, with five companies controlling 90% of the world’s grain trade and three controlling 85% of the tea market.

Moreover, many EU policies, commitments and agreements relating to investment in agriculture are not consistent with the declared food and nutrition security objectives. Their effects undermine the development potential of many communities in developing countries, and negatively impact rights and food security as they promote investments that fail to protect these.

The EU Common Agricultural Policy (CAP) potential effects on food security in developing countries concern the impact on the stability of world prices, the price advantage they convey to European producers, and the limitations on market access that are used to insulate the European market from outside competition.

More fundamentally, the proposed CAP approach to contributing to world food security, i.e. increasing EU production, goes against the rationale of the Commission’s approach to food security as formulated in the March 2010 communication on EU Food Security Policy Framework, which focuses on supporting smallholder farmers and rural livelihoods. Yet, by justifying the maintenance of farm subsidies as a measure to feed the world, the CAP also actively limits incentives and chances for agricultural development in developing countries.
The EU's agricultural policy is common throughout the EU, but different institutional arrangements are used to implement it at the Member State and regional level – for instance, in the management and programming of the funds from the European Agricultural Fund for Rural Development (EAFRD). Therefore, PCD must be promoted among national and local authorities, as they participate in the implementation of the CAP as well. A mechanism to ensure PCD does not exist at this level, nor does an information sharing mechanism or a debate about this problem.

In the first phase of the 2013 CAP's reform process, strong calls were uttered by the European Parliament's Development Committee (DEVE), as well as by non-governmental actors and EU Member States to look into options for a systematic monitoring of how the CAP affects developing countries.

DEVE proposed amendments that suggested integrating the CAP into the EU's broader framework for PCD and measure its external impact; ii) to phase out export subsidies entirely; iii) to address the EU's dependence on protein crop imports; and iv) completely decouple direct payments from production. DEVE also proposed regular, independent assessments focusing on the impact on local and smallholder producers while building on evidence submitted by a variety of stakeholders, including farmers' organisations, local governments and civil society organisations.

Nevertheless DEVE's amendments were rejected in the EP's plenary vote. At the Council level, development and global food security concerns never properly entered the debates for a common position and in general, development interests were not granted much attention in the CAP reform since stakeholder involvement and advisory structures are biased toward participants with a direct interest.

The agreement reached with the CAP failed to deliver on policy coherence for development, betraying the European Commission's original ambitions of greener European agriculture and leaving it to Member States (in agreement with local authorities) to opt for more social and environmental measures when they design their national implementation plans. The reform ended up being mainly about supporting the competitiveness of the EU's agribusiness sector, to the detriment of food security, environmental protection and respect for the rights of the poor in developing countries.

Furthermore, the EU renewable energy policy, with its incentives and supporting measures, is encouraging investment in biofuels production at the expense of the rights and food security of poor communities. It is driving investment in biofuels production to unsustainable levels, without safeguarding the rights of the people affected in developing countries.

In 2009 the EU adopted the Renewable Energy Directive, setting a 10% target for renewable energy use in transport by 2020, accompanied by financial subsidies to support biofuel consumption. This was an attempt to move towards decarbonisation, but it has created a huge incentive for European companies to invest and acquire huge tracts of land in countries where it can be cheaply and easily obtained – i.e., mostly, developing countries. Land grabs and food-price volatility are two clear impacts of the EU biofuels policy that are undermining the food and nutrition security of the poorest and most marginalised people in the world, and restricting their potential to develop.

The EU has become the biggest exporter and importer of agricultural goods, it is using a total of approximately 36 million hectares of land in developing countries, including 20 million hectares for its own intensive livestock production, with the acreage of transnational land acquisitions having risen from 15-20m hectares in 2009 to more than 70m in 2012.

Finally, despite the EU's effort in intensifying research on food and agriculture a small budget (<€10m) is used to invest in programmes designed to improve links between European and African researchers and to support NGOs. The chosen approach favours the delivery of technology products that are not grounded in local knowledge.
CONCORD suggests:

- **Revise the EU biofuels policy**: in October 2012 the European Commission proposed capping the use of biofuels from food crop sources that count in reaching the EU Directive objectives at 5%. CONCORD feels the cap should cover all biofuels produced using land competing with food, that it should be reduced to the level of biofuel consumption in the EU before the EU law was introduced, and that it should be reflected in the public financial subsidies system and in all relevant directives driving the consumption of biofuels (the Renewable Energy Directive and the Fuel Quality Directive). CONCORD also recommends the introduction of a complete phase-out of policies supporting land-based biofuel production or consumption, and invites the EC to produce a completely new report looking at the social impact of the EU biofuels mandate in developing countries and reflecting the principle that biofuel production must not compromise food or nutrition security and therefore must be managed so that food access and the resources necessary for the production of food are not put at risk;

- systematically refer to and use the EU Food Security Policy Framework and Implementation Plan, and the future Action Plan on Nutrition, as the overarching guidelines for all EU investment in agriculture, with a view to prioritising the empowerment of smallholder, as well as their access to and their control of productive resources;

- make the Voluntary Guidelines on Land Tenure a binding EU Directive to prevent EU investment from resulting in land grabs;

- revise the EU Research Policy: more research in food, nutrition and agriculture to be coherent with the goals of the EU’s Food Security Policy Framework, guided by the findings of the International Assessment of Agricultural Knowledge, Science and Technology for Development (IAASTD), favourable to researching issues identified by and in support of small-scale food providers, not subject to corporations’ control of research agendas, shared through farmer-to-farmer extension and other knowledge and skill-sharing programmes between small-scale food providers, that will constitute the basis of training for young farmers, fishers and pastoralists in developing resilient food-production systems;

- the setting up of an effective ex-post monitoring system and a formal complaints mechanism, which would allow small-scale farmers and other groups to challenge the EU formally when their rights or livelihoods are negatively impacted by the CAP, the prioritisation of crop rotation, the end of dumping of EU subsidized agricultural products exports into developing countries and more environmentally sustainable agricultural production.

### CRITICISM

- Smallholders are neglected by current public and investment policies;

- Many EU policies, commitments and agreements relating to investment in agriculture are not consistent with the declared food and nutrition security objectives;

- EU policy on biofuel gives huge incentive to European companies to invest and acquire tracts of land in developing countries at the expense of the rights and food security of poor communities;

- Little effort in EU research policy to strengthen the collaboration between Europe and Africa on the issues of food and agriculture

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**FOOD AND DEVELOPMENT**

**CONCORD’S SUGGESTIONS**
New and diverse recommendations are needed considering the involution of European policies on food security and the increasing incoherence with development objectives. The following questions arise and should be debated to identify new orientations:

- **Which coherent policies could be adopted to establish a just and sustainable global food system, grounded in human rights, most particularly the Right to Adequate Food, that requires food to be available, affordable and of good quality? The human rights approach compels us to pay special attention to those most vulnerable to hunger and assess policies by the impact they have on them.**

- **How can we ensure that the systems that currently feed and nourish the majority of people in the world – family-based, small scale, diversified and local – be the starting point and the focus for building and strengthening people’s right to food and nutrition, and for promoting access to fresh, healthy and diverse food?**

- **How can we integrate those involved in producing food and feeding people within the decision making processes on policies and laws, to make our food systems be truly participative and democratic, restoring people’s (especially women’s) control of the productive resources that determine their livelihood (including land, water, seeds and livestock breeds and agricultural workers having safe, decent working conditions and labour standards)?**

- **Which coherent policies could be promoted to support a sustainable approach to food production and distribution, to stop the unsustainable processes leading to climate change, biodiversity loss, chemical pollution, freshwater consumption (...)?**

- **How do we redefine a global food system that is resilient and that can deal with shocks and changes such as natural and manmade disasters, and ensure long term sustainability? Resilience can be best built by addressing the underlying environmental, social and economic causes of shocks, conflict and disasters.**

- **Even if the momentum for enhancing PCD offered during the adoption process of a new CAP passed producing only very few results – it is crucial to continue to promote key actions toward PCD. On one hand there are those that aim to point out incoherencies and collect/provide evidence on practical adverse effects the new CAP provokes in developing countries; and on the other there are those that aim to push single Member States/Local Authorities to introduce more social and environmental measures when they design their national implementation plans.**

Food and Development is one of the main topics at the centre of the project “MORE AND BETTER EUROPE“ that CONCORD Italia is implementing in occasion of the Italian Presidency of the EU. A specific publication on PCD will be dedicated to this subject, and coupled with seminars and advocacy events.

The project offers an excellent opportunity to discuss, inform, raise awareness and advocate for stronger commitments and practices in the field of agriculture and food security, that do not harm human rights, and global development. Materials will be available on the CONCORD Italia website: [http://www.concorditalia.org](http://www.concorditalia.org).

1.3.3 Trade and Development

Alongside its support for developing countries that help them to reap benefits of new trade deals, EU trade policy also promotes regional integration of developing countries’ markets, encouraging other developed countries to match the openness of the EU, promoting South-South trade and improving the WTO framework in areas such as trade facilitation. Through its Aid for Trade Strategy (AfT), the EU is committed to provide developing countries with technical assistance to anticipate and reduce any negative impacts of new trade rules or other measures affecting trade, and, more generally, to building capacity and addressing constraints that prevent developing countries from exporting effectively. However, in order to ensure that AfT fulfils this purpose, developing partners must integrate trade in their national development strategies.
Criticisms

Current EU trade policies towards developing countries lack clearly defined development objectives, and are therefore liable to destroy local production and increase an unhealthy dependence on commodity exports. The EU depends on cheap, stable imports of primary agricultural commodities for its high value-added processing industry. Through free trade agreements (FTAs), the EU aims to secure agricultural market access, and to confirm the role of the EU as a standard setter and of developing countries as standard takers. To achieve this, reduced technical barriers to trade and reduced export restrictions are pushed forward while investment chapters are included in FTAs in order to protect investors’ rights.

The EU’s FTAs also provide for various export competition tools (e.g. export subsidies, export credits, export promotion and marketing services) that remain unregulated under the WTO. On the other hand, no public interest clause is included in these agreements. This leaves gross imbalances and flaws in the global agricultural trade regime at the expense of developing countries. The practice of agro-dumping thus continues unchallenged, ruining small-scale farmers faced with cutthroat competition and surges in the imports of cheap agricultural products.

Economic Partnership Agreements (EPAs) are free trade agreements that the EU negotiates with countries from Africa, the Caribbean and the Pacific (ACP). They are presented as development instruments – but they are clearly examples of power imbalances. For example, ACP countries entering into an EPA are completely unable to challenge the EU on its subsidies regime under the Common Agricultural Policy. They find themselves with increased liberalisation commitments, including the fixing of low tariffs on agricultural products, following their earlier commitments to a common external tariff in their own custom unions without recourse to a special safeguard mechanism.

The newly imposed EU deadline for signing the EPAs – now set for 1 October 2014, with the consent of the EP but against the advice of its Development Committee – puts African parties under pressure without indicating how the current deadlock might be resolved or how ill-defined liberalisation schedules might be reviewed to ensure that they foster development objectives.

It is worrying to observe that a persistent trend in new investment, involving EU public money, aims to support agribusiness at the expense of smallholders. A proliferation of agricultural funds and public-private partnerships (PPPs) makes it difficult to track and monitor money flows in the agricultural sector. Increasingly, also, European Development Finance Institutions invest in agribusiness projects without any safeguards against the risk of land grabbing. PPPs often fail to clarify conflicts of interest, and they become an entry point for strategic business interests which end up overwhelming the interests of local SMEs and microbusiness rather than strengthening them.

Moreover, the planned US-EU trade deal, the Transatlantic Trade and Investment Partnership (TTIP), is in danger of contradicting global development targets, just when the target date for setting a new development agenda (September 2015) is approaching — see Box 2.

Global development experts, representatives of third countries and NGOs have recently expressed concerns regarding this agreement. First of all, TTIP’s content is not available to the public, and the fact that the US has not recognised all the fundamental labour conventions established by the International Labour Organisation (ILO), and that northern countries insist on compliance with labour standards in SDG negotiations or in free trade talks with developing countries, is causing concern given that no one knows what the agreement will include.

Secondly, TTIP is being implemented by the two biggest economic blocs, and will therefore set global standards in trade and investment for the next decades, and developing countries will not be able to negotiate better deals at both the bilateral and trilateral levels. It is therefore necessary that the TTIP be coherent with the Sustainable Development Goals (SDGs) that are currently being discussed. Indeed, SDGs should not be seen as detached from economic and trade agreements being negotiated in parallel, and more transparency is needed in order to ensure policy coherence for development.
CONCORD suggests:
- Inserting public interest clauses in EU investment deals;
- Activating and using product-specific investigations into HR violations under the EU trade regime;
- Refocusing on development in the Economic Partnership Agreement (EPA) negotiations, on the basis of the ACP proposal for a liberalisation schedule and outstanding contentious issues;
- Addressing conflicts of interest publicly and systematically in public-private partnerships;
- Promoting a bottom-up approach to improving regional market integration, starting with investing in infrastructure building at the local level and prioritising support for women farmers, domestic micro-business and SMEs as economic actors.

TRADE AND DEVELOPMENT

CRITICISM
- No defined development objectives in EU trade policies;
- Reduced technical barriers to trade and export restrictions;
- The Economic Partnership Agreements (EU-ACP countries) cause strong power imbalances in the global agricultural trade regime at the expense of developing countries;
- The actual investment trend supports agribusiness at the expense of smallholders.

CONCORD’S SUGGESTIONS
- Inserting public interest clauses in EU investment deals;
- Activating and using product-specific investigations into HR violations under the EU trade regime;
- Refocusing on development in the Economic Partnership Agreement (EPA) negotiations;
- Addressing conflicts of interest publicly and systematically in public-private partnerships;
- Promoting a bottom-up approach to improving regional market integration.

Trade and Development is one of the main topics at the centre of the project "MORE AND BETTER EUROPE” that CONCORD Italia is implementing for the Italian Presidency of the EU. A specific publication on PCD will be dedicated to this subject, and will be coupled with seminars and advocacy events. The project offers an excellent opportunity to discuss, inform, raise awareness and advocate for stronger commitments and practices in the field of trade that do not harm global development. Materials will be available on CONCORD Italia website: [http://www.concorditalia.org](http://www.concorditalia.org).

1.3.4 Migration and Development

The EU currently hosts around 31.8 million migrants (37% come from other European countries, 25% from Africa, 20% from Asia, 17% from Americas and 1% from Oceania) with an increasing migratory pressure on the EU’s Southern and Eastern borders. It is estimated that between 6% and 15% of the total number of migrants in the EU are irregular migrants. Migration has several root causes: from lack of freedom to wars, from poverty to climate change effects. Migrants looking for international protection and asylum are increasing. Conflicts and wars are pushing millions of people to refugee camps in adjacent countries, while some of them try to join their families and friends in Europe. International protection and asylum are becoming an urgent issue for the member states of the European Union. Their approach in recognising asylum is more and more restrictive, resettlement operations are few and insufficient, and conflicts among member states on solidarity and burden sharing is jeopardising the achievement of the objective of a common European asylum system.

‘Decent work’ is a development objective and a specific Millennium Development Goal, which the EU committed to achieve, but lack of decent work remains a major push factor of labour migration. When migrants arrive at their destination, their integration in the host country is a real challenge. Low access to adequate employment jeopardizes migrants’ capacity to participate in the development of their country of origin and to fully enjoy their rights. The current restrictive approach to EU migration policy poses additional obstacles, because of its lack of consideration for development implications and Human Rights requirements.

Poverty as well as the lack of decent work are major driving forces behind international migration, particularly in the developing world. The integration of migrants in EU Member States is determined to a large extent by their opportunities to actively participate in gainful employment, to afford a decent living and to be involved in all spheres of society. Irregular migrants are more likely than other migrants to experience precarious working conditions, social exclusion and a situation of dependence vis-à-vis their employer in a grey legal area affording no social and health security welfare or any labour rights protection against mistreatment and exploitation.
CONCORD suggests:

• In order to effectively promote the development pillar of the GAMM, the EU should put the **advancement of international labour rights standards** and their comprehensive ratification at the centre of related policy deliberations, as well as their implementation by EU Member States.

• The majority of migrants constitute a very vulnerable group that is driven by the lack of decent work opportunities and faces an “exploitation trap” in receiving societies. To break this trap, a new paradigm should be adopted, based on a sustainable development-focused, migrant-centred and human rights-based approach to migration.

• A clear, **legally binding catalogue of coherent policies** needs to be devised, while the implementation of **social and legal protection of migrants** has to improve in the EU as well as globally. To this end, the EU should use its international leverage in **promoting international standards protecting migrant workers**.

New and diverse recommendations are needed considering the involution of the European policies on migration and the increasing incoherence with development objectives. The following **questions** arise and should be debated for identifying new orientations:

• How can the **coherence between immigration and asylum policies with international protection, development and peace building actions** be improved?

• How can the **Dublin regulation** to secure human rights of asylum seekers be changed, increasing **resettlement operations**, establishing new **European solidarity mechanisms**, and exploring possibilities to implement **humanitarian corridors**?

• How can the **migration and mobility partnership** be redefined, putting migration and development opportunities at its center, and giving more chances to real and effective mobility channels **integrating labour markets and transnational economic relations**?

• Which changes in law and practices could be promoted for **recognising citizenship, political participation, social and economic inclusion** of migrants, thus opening up opportunities for **diasporas** to increase their cooperation with origin countries and improving the portability of social rights?

• Which are the new coherent policies to put forward on **climate change** and migration, migration and territorial cohesion issues (rural exodus and family farming development, urban social cohesion, …)?

• Which new policies are needed for creating a **transnational welfare** and “**family-to-family**” approach to address the social impact of migrations (divided families, left behinds, family reunification, unaccompanied minors, pregnant women and mothers with children) solving the psychological and affective deprivation of migrants and their relatives, and defining new rules for the protection of minors and mothers in order to maintain **positive bonds** between host and origin families (f. e. endorsing the foster care system)?
1.4 Challenges and constraints for PCD

The implementation of PCD faces a number of challenges and constraints.

First, incoherencies are not so easy to avoid, because development objectives are sometimes subordinated to other interests and are mainly considered to be handled by aid only. Since the concept of PCD is still not sufficiently understood in many countries, particularly outside of the development policy communities, there is no strong political interest or will to implement PCD.

Moreover, specifying the nature, scale and impact of policy incoherence and quantifying its costs presents major methodological challenges. The situation is worsened by the fact that PCD is mostly approached from a one-dimensional point of view, it is being treated ad-hoc and discussed only in existing dialogue forums when relevant.

Besides, the existing institutional mechanisms lack efficiency, and most importantly, there is neither a complaint mechanism to channel the voice of the victims of incoherencies up to policy makers nor a redress mechanism to revise those policies that contradict development objectives.

Finally, a working mechanism implies very strong coordination between the different actors at national and international levels. This complexity may affect the results of the process, therefore it is crucial that the different actors, both developed and developing countries, are enabled to play their role effectively.

A lot is still to be done, and PCD can only be achieved as a collective effort and through an open and inclusive framework, based on the active involvement of emerging economies, developing countries and international organisations.
2. PCD SYSTEM
### 2.1 Who are the actors?

As said above, PCD derives from a complex process that results from a continuous exchange between many players acting at international, European, national and sub-national levels, each one with a different role and pursuing different objectives. Box 3 gives you an overview of major stakeholders involved in this process.

<table>
<thead>
<tr>
<th>ACTORS</th>
<th>ROLE PLAYED</th>
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<tbody>
<tr>
<td><strong>GLOBAL LEVEL</strong></td>
<td><strong>INTERNATIONAL ORGANIZATIONS</strong>&lt;br&gt;• UN&lt;br&gt;• OECD</td>
</tr>
<tr>
<td><strong>EUROPEAN LEVEL</strong></td>
<td><strong>EUROPEAN INSTITUTIONS</strong>&lt;br&gt;• COMMISSION&lt;br&gt;• PARLIAMENT&lt;br&gt;• COUNCIL</td>
</tr>
<tr>
<td><strong>NATIONAL LEVEL</strong></td>
<td><strong>COUNTRIES</strong>&lt;br&gt;• EU MEMBER STATES/LOCAL INSTITUTIONS AND AUTHORITIES&lt;br&gt;• DEVELOPING COUNTRIES/LOCAL INSTITUTIONS</td>
</tr>
<tr>
<td><strong>SUB-NATIONAL LEVEL</strong></td>
<td><strong>CIVIL SOCIETY AND PRIVATE SECTOR</strong> (both in developed and developing countries)&lt;br&gt;• NGOs/CSOs&lt;br&gt;• RESEARCH INSITUTES/THINK TANKS/UNIVERSITIES&lt;br&gt;• BUSINESS</td>
</tr>
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</table>

Sources: EU 2013 Report on PCD; CONCORD's 2013 Spotlight Report on Policy Coherence for Development
At the global level the main actors that enhance the PCD debate and broaden policy coherence approaches to tackle more complex and interrelated development challenges are the United Nations, especially in promoting PCD in the context of MDGs, the Post-2015 framework and beyond, and the Organization for Economic Cooperation and Development (OECD), which plays an important role in informing European and international discussions about PCD and invests in measuring the effects of OECD members’ policies and the results that are achieved through concerted efforts to promote PCD.

Other actors that could be better involved and could provide platforms for dialogue on policy coherence for development issues are regional and sub-regional organizations such as the Association of Southeast Asian Nations (ASEAN), the Mercado Común del Sur (Mercosur), and the African Union (AU), to name a few.

The European Union is currently the only region in the world to have taken on a binding obligation to be accountable for how all its policies affect the world’s poorest, and it is also the largest aid donor in the world. This reflects its commitment to fighting global poverty.

The European Commission, the European Parliament and the European Council are all equally responsible for promoting PCD and taking account of development objectives in the policies they adopt.

Since the first political commitment in 2005, European Institutions have made significant progress towards the implementation of PCD - for an overview of the main steps EU made towards PCD see Box 4. However, the achievement of a fully efficient PCD system still has a long way to go.

**BOX 4 - FOCUS ON:**
**KEY STEPS FOR PCD IN THE EU**

- **2005:** the commitment towards Policy Coherence was embedded in the European Consensus on Development adopted in December 2005, the EU agreed to apply the Policy Coherence for Development approach in 12 policy areas (Trade, Environment, Climate change, Security, Agriculture, Fisheries, Social dimension of globalisation, employment and decent work, Migration, Research and innovation, Information society, Transport and Energy) that could accelerate progress towards the Millennium Development Goals;

- **2007:** a first progress report on PCD was published;

- **2009:** with the Lisbon Treaty (Article 208) PCD became an obligation within the EU, the EU agreed to make the PCD agenda more operational and to focus future policy coherence development on 5 priority areas for achieving the UN Millennium Development Goals: trade and finance, climate change, food security, migration and security; the Commission published the second progress report on PCD, suggesting how PCD should be approached in a more targeted, effective and strategic way, and the European Parliament (EP) passed a resolution which led to the establishment of a PCD standing Rapporteur within the EP, namely a Member of the European Parliament (MEP);

- **2010:** the Commission presented the Policy Coherence for Development Work Programme 2010-2013, structured according to the above mentioned five priority areas. The Work Programme guides the work of the European Commission and serves as an inspiration for Member States in their PCD work—see Box 6;

- **2011:** the Commission published its third progress report on PCD;

- **2012:** the EU’s development ministers reiterated their commitment to PCD at the Foreign Affairs Council, emphasising the need for a more evidence-based approach and for enhanced dialogue with stakeholders in developing countries, and the European Commission Directorate general for development and cooperation; EuropeAid, has conducted a study assessing the impact of biofuels production on developing countries from the point of view of PCD.

- **2013:** the Commission published its fourth progress report on PCD—see Box 7;

- **2014:** expected release of a new PCD Work Programme for the 2014-2017 period.

As regards single countries, not every EU Member State has started to implement PCD commitments and mechanisms from the EU to the national governmental and local levels yet – see paragraph 3 of this Section of the Toolkit.

As there are a variety of institutional instruments to adopt, each country can choose the mechanisms it finds more suitable to its national institutional structure. By the way, as will be explained in paragraph 2.2 below, the chosen system should respect some characteristics in order to be effective in responding to PCD needs. Local Authorities acting in Member States should also be accountable for policy coherence for development, as they make decisions in important thematic areas, such as the Common Agricultural Policy (CAP), potentially causing negative spillovers in developing countries.

Developing countries are also key actors, they ultimately are the recipient of coherent policies enhancing development or, on the contrary, the most affected by incoherencies. They should therefore have a strong, active role in the process of detecting incoherencies (the EU should give them broader opportunity to discuss and provide data and evidence of the results of incoherent policies) and push towards the adoption of a redress mechanism for those policies that contradict development objectives.

Several types of civil society organizations are involved as well, acting at a sub-national, national, regional, European or international level depending on their nature and purposes. NGOs, CSOs, research institutes, think tanks, universities and the business sector organizations (such as smallholder farmers, etc.) can play a fundamental role, by constantly reminding decision-makers of their PCD commitments and supplying them with new data, evidence and research, and by channelling the voice of victims of incoherencies.

The private sector, being involved and having interests in many of the policies related to PCD, both globally and at national level, is a key actor to avoid business activities that negatively affect the achievement of development objectives by working in the framework of social responsibility.

All the above-mentioned actors have to relate to PCD issues, and the next paragraph (2.2) will sum up the main processes and instruments at their disposal to promote EU coherent policies and to identify the consequences of EU incoherent policies. Criticisms and suggestions from CONCORD will also be included in the analysis.

### 2.2 How can the EU make coherent policies?

The OECD, thanks to the experience gained analysing PCD progress of member states included in the Development Assistance Committee (DAC) Peer Reviews over the years, identified a process that allows the promotion of policies that are coherent with development objectives and the detection of those that contradict them.

The identified process is composed of three elements, necessary for achieving PCD:

- **Political commitments;**
- **Coordination mechanisms;**
- **Assessment and coordination mechanisms.**

A fourth element could be added, a redress mechanism, aimed to revise those policies that are proven to conflict with development objectives. At present the latter mechanism does not exist, but it would complete a well-functioning system that includes PCD in the policymaking cycle.

This section will present which instruments are included in the aforementioned mechanisms, how the European Institutions are working to progress towards more coherent policies, the constraints they face, and what could be added or improved, based on CONCORD’s recommendations and suggestions – see Box 5 for an overview.
## Concord’s Recommendations

<table>
<thead>
<tr>
<th>Tools</th>
<th>Who / What in the EU</th>
<th>Concord’s Recommendations</th>
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<tbody>
<tr>
<td>Political Commitments</td>
<td><strong>WHO</strong>&lt;br&gt;- EU Commission&lt;br&gt;- EU Council (At this stage, the role of NGOs and CSOs is crucial to push institutions to express a stronger commitment)**</td>
<td><strong>Explicit political commitments to the tools and mechanisms</strong>&lt;br&gt;- <strong>Clearer political objectives in the next PCD Work Programme</strong>&lt;br&gt;- <strong>Stronger commitments from Member States</strong></td>
</tr>
<tr>
<td></td>
<td><strong>WHAT</strong>&lt;br&gt;- Art. 208 Lisbon Treaty&lt;br&gt;- 2005 and 2012 EU Commitments&lt;br&gt;- 2013 Council Conclusions&lt;br&gt;- PCD Work Programme 2010-2013</td>
<td></td>
</tr>
<tr>
<td>Coordination Mechanisms</td>
<td><strong>WHO</strong>&lt;br&gt;- EU Commission&lt;br&gt;- European Parliament</td>
<td><strong>Mainstream existing PCD mechanisms</strong>&lt;br&gt;- <strong>Greater transparency of the current mechanisms</strong>&lt;br&gt;- <strong>Effective inter-institutional communication</strong>&lt;br&gt;- <strong>Reinforce the role of the EP’s standing rapporteur</strong></td>
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<td></td>
<td><strong>WHAT</strong>&lt;br&gt;- Standing Rapporteur&lt;br&gt;- ISCs&lt;br&gt;- ISGs&lt;br&gt;- Inter-institutional relations</td>
<td></td>
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<tr>
<td>Assessment and Monitoring Mechanisms</td>
<td><strong>WHO</strong>&lt;br&gt;- EU Commission&lt;br&gt;- European Parliament&lt;br&gt;- NGOs, CSOs, Research Institutes, Universities, Think Tank</td>
<td><strong>New IAs reference to the PCD obligation</strong>&lt;br&gt;- <strong>CSOs inputs included in all stages of the IA process</strong>&lt;br&gt;- <strong>Include development experts in the IA Board</strong>&lt;br&gt;- <strong>Increase DG DEVCO’s capacity to give input and support to other DGs in assessing development impacts</strong>&lt;br&gt;- <strong>EP’s IA unit should give special attention to PCD issues</strong>&lt;br&gt;- <strong>Mainstream PCD in public consultations and focus policy dialogue on issues relevant to development</strong>&lt;br&gt;- <strong>Set up a system feeding information and evidence into the policymaking cycle</strong>&lt;br&gt;- <strong>Development impact monitoring introduced as a precautionary measure</strong>&lt;br&gt;- <strong>Guidelines for participatory monitoring involving local stakeholders</strong>&lt;br&gt;- <strong>Quality control of the monitoring process</strong>&lt;br&gt;- <strong>Public access to the outcomes of the monitoring process</strong>&lt;br&gt;- <strong>Consultation on alternative policy options and possible corrective action</strong></td>
</tr>
<tr>
<td></td>
<td><strong>WHAT</strong>&lt;br&gt;- IAs on PCD (Review for new guidelines expected in 2014)&lt;br&gt;- Detection: Dialogue; Public hearings an inter-groups&lt;br&gt;- Monitoring: EU Biennial progress report&lt;br&gt;- Complaints</td>
<td></td>
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<tr>
<td>Redress Mechanisms</td>
<td><strong>WHO</strong>&lt;br&gt;- No actors appointed</td>
<td><strong>Set up an institutional way of forcing a policy review in case of the detection of incoherencies</strong></td>
</tr>
<tr>
<td></td>
<td><strong>WHAT</strong>&lt;br&gt;- No instrument in use</td>
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2.2.1 Political commitments

Progress towards PCD starts with political commitments to developing objectives and to ensuring coherence between policies focused on development and policies focused on other objectives. Incoherent policies are often caused by conflicting agendas; that is why PCD needs commitments at the highest political level.

Good political leadership is essential in order to find solutions that actually ensure the full implementation of PCD, which also requires the setting of clear lines of responsibilities, adequate budget and human resources.

Political commitment is an essential foundation for setting and prioritising objectives, while policy statements translate political commitment into clear, prioritised and coherent policies, in some cases backed up by legal frameworks.

At this stage, a fundamental role is played by CSOs and NGOs that, together with other actors of civil society, research organisations and partner countries, can build support for PCD on a long-term basis by raising awareness, engaging the public, and advocating for the implementation of policy coherence.

Some research demonstrates that pressure from civil society is a key factor in obtaining high-level political commitments in favour of PCD.

Finally, pressure from the international context (IIOs as OECD) can be useful to push national governments to make progress with PCD commitments.

a) EU state of play

The first European commitment to PCD emerged from the European Consensus on Development in 2005, the key inter-institutional agreement on development cooperation signed by the European Commission, the European Parliament and the European Council.

Yet, it was with Article 208 of the Lisbon Treaty – see Box 1 - that PCD became an obligation within the European Union. The entry into force of the Treaty in December 2009 reinforced the legal basis of PCD in the EU, and the inclusion of PCD in its fundamental law sets the EU apart on the international stage. The EU became the first and only region in the world to have a legal commitment to PCD.

More recently, in May 2012 the EU’s development ministers reiterated their commitment to PCD at the Foreign Affairs Council, emphasising the need for a more evidence-based approach and for an enhanced dialogue with stakeholders in developing countries.

A further commitment came from the Council Conclusions on policy coherence for development, the latest as of December 2013, that reiterated the political engagement expressed in the Lisbon Treaty, and also made recommendations for further progress.

Directly linked to political commitments, an implementation strategy, based on policy statements, tangible actions, tools, objectives, indicators and resources is also necessary in order to start the process leading to coherent policies.

In this regard, in 2010 the European Commission released the PCD Work Programme – see Box 6 - that serves as the Commission’s agenda for PCD promotion in a given timeframe and proposes targets and indicators per identified policy area. Now a new agenda for the 2014-2017 period is in progress and is expected to be released by the end of this year (2014).
b) Criticism

Even if the European Union committed to PCD at a very high political level, making it a legal obligation in the Lisbon Treaty, concerns still arise at this stage of the process. In fact, despite the pressure of the commitments made at the EU level, it is not always easy to obtain a political commitment from the different Member States. The legal framework provides a mechanism for accountability, but it is not sufficient in order to progress towards the achievement of PCD. Moreover, PCD is just one among many priorities of the EU Delegations and it is not given high priority. EU delegations are not involving enough civil society organizations in the discussions on the impact and effects of EU policies, and none of them have taken specific action to implement the May 2012 Council Conclusions. Finally, even the strongest commitment to PCD without a tight implementation strategy will not deliver results. For example, in the 2010-2013 PCD Work Programme, as stated in the EC 2013 Report on Policy Coherence for Development, “targets and indicators were set to help track progress towards the identified PCD objectives, but these have been criticised for being too imprecise. Also, they have been of limited usefulness for the EU as many of them (e.g. ‘conclusion of the Doha Round’) are, to a greater or lesser extent, beyond its control.”

c) Recommendations by CONCORD:

The EU should:

- Express explicit political commitments to the tools and mechanisms at a high level, to enable the EU to advance towards more responsible, evidence-based policymaking.
- Set clear political objectives in the next PCD Work Programme for all focus areas, in order to deliver results in terms of policy change and PCD impact. The Programme’s scope, baselines, indicators and targets will have to be considered carefully in the 2014-2017 Programme;
- Request stronger political commitments from the Member States at the national level.

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BOX 6 - FOCUS ON: PCD WORK PROGRAMME 2010-2013

The Policy Coherence for Development (PCD) Work Programme translates PCD political commitments into an operational framework involving concrete steps to enhance the coherence of EU policies with development objectives.

The 2010-2013 Work Programme outlines how the EU should address, through relevant policies, processes and financial means, five global challenges in a development-friendly manner: trade and finance, climate change, global food security, migration and security.

It does not provide a comprehensive list of all initiatives that might be relevant for development, but rather focuses on planned initiatives and processes that stand out for their potential as ‘PCD catalysts’.

In setting concrete targets and indicators to promote PCD, the Work Programme establishes a scoreboard to track progress towards the identified objectives.

The PCD work programme is conceived as a tool for all EU institutions and Member States, to guide their review and decision-making across a broad range of decisions that affect developing countries’ opportunities.

It also represents an important step towards a strengthened dialogue with developing countries on PCD issues. On the basis of the programme, developing countries might identify relevant initiatives in which to engage in discussions with the EU.

Source: EC PCD Work Programme 2010-2013, EC 2013 Report on PCD
2.2.2 Coordination mechanisms

The second necessary element to implement PCD is the ability to co-ordinate different actors during the policymaking process, without contradicting development objectives. Effective coordination mechanisms facilitate the navigation through complex politics of policy processes and enable conflicts or inconsistencies between policies to be resolved.

A prerequisite for this mechanism to function, is quality, effective communication between the different institutions, as well as a clear definition of responsibilities of the actors involved in the coordination process. In order to be truly effective, coordination mechanisms must be placed at a sufficiently high level, must have the mandate to “arbitrate” on policy and must provide a forum for inter-institutional discussions.

Coordination mechanisms should be in place to discuss proposed policies upstream, to clarify and resolve potential conflicts and to ensure that there are no unintended consequences for development. Such discussions are also helpful to raise awareness about development and to promote the efficiency and effectiveness of policies.

a) EU state of play

The EU Council has mentioned the importance of effective coordination between the European Parliament and Member State parliaments several times. From the EU Commission’s side, inter-service consultations (ISCs) are organized among Commission services that allow relevant DGs to be involved in any policy process with possible implications for their area of expertise. They also enable (DEVCO) officials to raise development concerns at an early stage and suggest development-friendly modifications to policy proposals.

The PCD Inter-service group (ISG), created in 2006 in the European Commission, provides a second working-level opportunity to identify and monitor policy processes with a potential impact on developing countries. Bringing together participants from the different DGs who act as PCD focal points for their respective policy areas, the ISG constitutes a forum for inter-DG discussions on PCD. As such, ISGs offer an opportunity to identify possible synergies between policies.

Finally, the Parliament appointed a Standing Rapporteur with a two-year mandate in 2010 to enhance collaboration between the parliamentary committee on development (DEVE) and other EP committees to ensure development-friendly policy making in parliament. The Standing Rapporteur is also responsible for the drafting and presentation of a biennial PCD report.

b) Criticism

In general, there is a lack of institutional and coordination mechanisms for implementing PCD effectively. Progress on policy coherence requires clarity about responsibilities and mandates. In the absence of such clarity, shared responsibilities for achieving coherence can amount to diffused responsibilities, a lack of accountability and a failure to deliver coherence.

As several studies highlighted, substantial progress is still to be made in terms of a closer coordination between the EU Commission, the EU Parliament and the Parliaments of Member States. They should engage in more information-sharing on the subject and contribute to promoting PCD in the EU.

There is also a need for more formal coordination between policy areas and committees, and more accountability through hearings (also with non-development ministers).

Finally, in the 2013 Conclusions, the European Council called for a closer cooperation between the European External Action Service (EEAS), the European Commission and EU Member States to strengthen PCD.

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11 Engendered by the Treaty of Lisbon (December 1, 2009), the European External Action Service is under the authority of the High Representative for Foreign Affairs and Security Policy. It is the EU’s diplomatic corps. It supports the EU foreign affairs chief in conducting the common foreign and security policy. It has Delegations around the world working on behalf of the people of Europe and representing the EU as a whole.
c) Recommendations by CONCORD

The EU should:

- Properly **mainstream many existing mechanisms** bringing great benefits to PCD;
- Ensure greater transparency on the current mechanisms, which would also enable external stakeholders to access and feed in information, and to monitor their effectiveness;
- Ensure effective communication among institutions;
- Request that the European Parliament **renew the function of the standing Rapporteur for PCD**, making it a permanent part of the European Parliament set-up and allocate additional resources for his activities and initiatives. The standing Rapporteur should have a coordinating role in ensuring PCD input to relevant processes across the Parliament’s various Committees.

### 2.2.3 Assessment and monitoring mechanisms

The third pivotal element to implement PCD is an **assessment and monitoring system** that tracks the **impact of policies**, that analyses the **evidence** collected and that **reports on that impact**.

In the absence of such evidence, which is crucial for accountability and learning as well as for evidence-based policy making, progress towards policy coherence will not be fully effective.

Moreover, this mechanism must involve two different levels in order to be truly functioning:

- On the one hand, assessment and monitoring mechanisms are needed to continuously assess the **potential and actual impact of single policies** in developing countries;
- On the other hand, the PCD “system” must **be monitored and evaluated as a whole**, as a matter of accountability and effectiveness.

When referred to a single policy, assessment and monitoring must also develop in different phases:

- First, mechanisms as **ex-ante assessments** should be envisaged to prevent incoherencies, taking into consideration the consequences and impact that a proposed policy could have in developing countries;
- Second, **ex-post mechanisms** should be implemented to detect incoherencies, monitoring the effects that a policy already approved has on development objectives.

The analysis that follows focuses initially on ex-ante mechanisms to prevent incoherencies, and then on ex-post mechanisms to detect incoherencies — the latter, to simplify, are divided in three sub-categories: dialogue, monitoring and complaint mechanisms.
2.2.3.1 Assessment mechanisms to prevent incoherencies

Ex-ante assessments are essential instruments for evidenced-based policymaking and for preventing — at the earliest possible stage — the adoption of incoherent, development-unfriendly policies within the EU system. Great development expertise is needed in order to correctly evaluate the possible consequences that a non-development policy could have on development objectives, before its implementation.

In this phase, civil society organizations, like CSOs, NGOs and research institutes are a fundamental resource and should be involved in the process. Their knowledge of the issues concerned, gained by working in developing countries, and studying and researching policy aspects relevant to development, could provide useful information on the potential impact of the proposed policies.

a) EU state of play

At the moment, the only tool that is being used at the European level for the purpose of preventing incoherencies is the Impact Assessments (IAs). Nevertheless, IAs are not specific instruments following PCD objectives, but generically help the European Commission evaluate the potential economic, social and environmental consequences of a new proposal. An impact assessment gives decision-makers evidence regarding the need for EU action and the advantages and disadvantages of alternative policy choices. They are carried out in-house but external inputs from stakeholders are also feed into the analysis. They are an obligation for all new major legislative or policy proposals such as regulations, directives, major strategies and mandates for negotiations with third countries, in particular they look at the initiatives that may affect developing countries and they consider their coherence with the objectives of EU development policy. This analysis includes the possible consequences (or spillovers) in the longer run in areas such as economic, environmental and social policy. The IAs Guidelines are now under review (new guidelines to be released by the end of 2014). Adapting this instrument by expanding its function to specific PCD's purposes, would strongly enhance prevention of incoherencies with development objectives.

b) Criticism

IA are currently not working for PCD purposes, as no dedicated support is provided to help the IA drafters address development issues in their analysis. Moreover, despite the fact that quality checks of all IAs are carried out by a Board composed of high-level civil servants appointed by the Commission president, the members' development expertise is rather limited (none of the members come from DG DEVCO). It is relevant to notice that no IA has ever been rejected and sent back for improvement on the sole ground of inadequate assessment of development impact, and civil society participation in the IA process is also extremely limited.

c) Recommendations by CONCORD

The EU should:
• Explicitly reference PCD obligation in the new IA guidelines alongside the present economic, social and environmental ones;
• Systematically include CSOs inputs in all stages of the IA process;
• Include development experts among the Commission's high level officials composing the IA Board;
• Increase the capacity of DG DEVCO to give input and support to other DGs in assessing development impact;
• Request EP's IA unit to pay special attention to development impact issues, and strengthen its capacity to address loopholes in the Commission's IAs where development is concerned.
2.2.3.2 Monitoring mechanisms to detect incoherencies

Monitoring mechanisms help detecting incoherencies when a policy has already been approved. All EU policies include provisions for monitoring, reviewing and evaluation systems. Some EU policies already have a built-in requirement to report on the impact of development. This is especially appropriate when the ex-ante analysis has been able to establish that there is a risk of adverse effects on development objectives. This stage of the process involves many actors, as both developing countries and members of civil society have to intervene when they collect evidence of policies contradicting development objectives. Evidence-based arguments are crucial for correcting policies, and they require further research by government, academia and CSOs.

Detecting incoherencies is a process that essentially includes three important elements:

a) Dialogue;
b) Monitoring of development impact;
c) Complaint mechanisms.

A more detailed analysis of how these elements are currently being implemented at the European level and CONCORD’s recommendations to improve their effectiveness follows.

a) Dialogue
The first measure that allows the detection of incoherencies is the introduction of a permanent channel for communication with the direct recipients of the consequences that EU policies have in developing countries. In order for PCD to function, it is crucial to involve those who have a stake in the issue concerned.

Dialogue with stakeholders from developing countries, actors from civil society such as CSOs, NGOs, research institutes, universities and think tanks ensures access to first-hand information that could not be collected otherwise.

a.1) EU state of play
Public consultation on major policy proposals is an obligation of the Commission and often takes place through a public questionnaire. There are also more informal or selective ways of consulting stakeholders. The way questions related to PCD are included in these consultations can vary, while it is also the responsibility of stakeholders to bring forward PCD-related issues in their responses if they wish.

Policy dialogue is in addition to these above-mentioned consultations, and entails a longer-term approach and a broader agenda. The system of advisory boards set up by DG Agriculture and Rural Development (DG AGRI), such as the one on the external impact of the CAP, is an example of a form of institutionalised policy dialogue involving diverse stakeholders.

The ability of such fora to address the development impact of non-development policies is however very limited, while direct participation by stakeholders from developing countries is often not envisaged.

In May 2012 European development ministers took a major step forward by deciding that the EU must organise formal dialogues on the impact of policy on developing countries with the local stakeholders, including local civil society organisations and parliaments. The Council underlined that the EU Delegations had a “crucial role” to play in this.

In the implementation of this decision there is great potential for gathering direct information on the likely impact of planned policies and also for detecting negative effects, and therefore incoherencies, while a policy is being implemented.

The information thus collected could also improve the analysis of the usual ex-ante impact assessments and policy evaluations carried out by the Commission.

EU Delegations are then encouraged to systematically include PCD issues in the regular dialogue with partner countries to better assess the impact of EU policies at the country level and the interaction with partner countries’ policies.

DEVCO’s PCD Unit also organises PCD training sessions for delegation staff in order to strengthen staff understanding of PCD as well as capacity to flag the potential impact of incoherencies in EU policy-making.

a.2) Criticism
Public consultations scarcely have the means to identify the development impact of non-development policies, also because the direct participation of local stakeholders is often not considered.

At present there are not sufficient opportunities for better involvement of partner countries in policy dialogue, there is a lack of feedback from them, and there is no institutional channel for the voices of victims of incoherencies to be heard by EU policymakers.

The decision taken in May 2012 by European de-
velopment ministers has not been implemented yet. Neither the European External Action Service (EEAS) nor the Commission sent any instructions to the EU Delegations in this regard.12

a.3) Recommendations by CONCORD
The EU should:

- Encourage the Commission to mainstream PCD in public consultations and policy dialogues that focus on questions relevant to development;
- Encourage the Commission and EEAS to implement the Council Conclusions regarding PCD, and thus organize consultations of relevant stakeholders such as the local communities, CSOs, local policymakers and representatives in developing countries;
- Set up a system for feeding the information and evidence collected into the policymaking cycle, leading ultimately to the correction of incoherencies where they occur.

b) Monitoring
Another measure to adopt in the process for detecting incoherencies is a monitoring-system to track the development impact of non-development policies. Useful tools for instance could be reports or studies that would include the relevant development aspects to pay attention to.

An efficient monitoring system requires the definition of clear indicators that could give the possibility of measuring the effectiveness of policies in term of coherence and their impact in developing countries.

The results of such an analysis should become public to all stakeholders and ultimately lead to corrective actions or policy corrections.

b.1) EU state of play
All EU policies include the provision for monitoring, review and evaluation systems, and the explicit obligation to monitor and report on the impact of development as part of the policymaking cycle is very important.

An EU Biennial Progress Report on PCD was issued in 2007 by the European Commission. Its aim is to monitor progress on EU PCD commitments and in the relevant policy areas as set in the PCD Work Programme. So far, four reports have been released, the latest in 2013 – see Box 7 - the next one is expected in 2015.

Moreover, Article 12 of the Cotonou Partnership Agreement (CPA) enables the 79 current members of the African, Caribbean and Pacific Group of States (ACP), to flag harmful effects of EU policy incoherencies and possibly submit amendments to policy measures.

b.2) Criticism
As far as development impact monitoring of EU policies is concerned, the number of instances of the implementation of the reporting requirement at the EU level is far below expectations. The level of knowledge of development impact is insufficient to set up mechanisms for monitoring studies that would address the relevant development aspects.

Moreover, there are no guidelines that explicitly state how to bring in development expertise when development impact is involved.

The EC Report on PCD is then poor in admit-
ting pending cases of incoherencies. Instead of identifying the incoherencies that cause conflicts or pointing out contentious issues that need attention to move forward with the PCD agenda, the thematic chapters generally restate the Commission’s intent of policies on paper. Furthermore, as highlighted by the European Centre for Development Policy Management (ECDPM) in its “EU Policy Coherence for Food Security Aligning parallel agendas”, so far the mechanism of Article 12 of the Cotonou Partnership Agreement (CPA) has hardly been used, mainly due to a lack of awareness and capacity on the ACP side. Nonetheless, ACP states are familiar with the EU’s commitments to PCD and have used the PCD argument in their dealings with EU policy-reforms, e.g. during the reform of the EU sugar regime13.

b.3) Recommendations by CONCORD

The EU should:

• Introduce development impact monitoring as a precautionary measure when there is a risk that the EU policy is in danger of having an adverse impact;

• Set up guidelines for participatory monitoring involving local stakeholders, with a particular focus on civil society and the people affected;

• Promote quality control of the monitoring process outcomes by independent experts which may include alternative policy options and possible corrective action;

• Promote timely public access to the outcomes of the monitoring process, as well as consultation on alternative policy options and possible corrective actions.

13 Cf. http://www.acp.int/content/acpldc-sugar-group-deeply-disappointed-eu-council-proposal-sugar

BOX 7 - FOCUS ON: EUROPEAN COMMISSION 2013 REPORT ON POLICY COHERENCE FOR DEVELOPMENT

The report shows that the European Union has made good progress on Policy Coherence for Development (PCD) at both the European and Member States level between 2011 and 2013. PCD issues have benefited from sustained high-level political attention in the EU and featured more prominently on the agenda of the Foreign Affairs Council and from international reflections on the form and content of a Post-2015 framework that highlighted the key importance of ‘beyond-aid’ issues, including PCD.

Several Member States (MS) now produce national reports on PCD, have included it as a key element in their annual reports on development cooperation and some have also invested to improve the measuring of PCD in their national systems. MS have also been more active in their exchanges on the issue, both among themselves and with the Commission and the High Representative of the Union for Foreign Affairs and Security Policy (HR).

Progress has also been registered as regards awareness of and attention to PCD issues, particularly in the policy-making process and in relation to key policy initiatives. The PCD training that has been introduced for the Commission’s headquarters and Delegation staff (as well as EEAS and Member State officials) is likely further to improve awareness and implementation of PCD principles at EU and Member States level.

Research and innovation policy has been supportive of development cooperation in specific thematic sectors as well as a cross-cutting driver for inclusive and sustainable growth. There has also been an increase in the last two years in the number of pilot studies, inter-service processes and public debates on PCD and good practices at the EU level and in the Member States, reaching far beyond the traditional development policy community.

The European Commission report on PCD also records progress and development on cross-cutting PCD issues and presents thematic topics organised around the five global PCD challenges of trade and finance, climate change, food security, migration and security.

The main challenge for EU progress on PCD still remains the issue of measuring—baselines, targets and PCD indicators (including the cost of incoherence). In general, PCD-targeted research is necessary if PCD commitments are to be translated into more concrete results and if the added value of PCD is to be demonstrated. Nevertheless, the EU remains the lead actor for PCD internationally.

Source: EC 2013 Report on PCD
c) Complaint Mechanism
The third element required to implement the process of incoherency detection is a complaint mechanism in which complaints could eventually lead to recourse.
Two possible types of complaint could be envisaged in relation to PCD:
- Complaints about the effectiveness of the policymaking process in studying the development impact of policies;
- Complaints about policies themselves that either undermine or are in danger of undermining development objectives.

### c.1) EU state of play
The complaint about the effectiveness of the policymaking process in the analysis of development impact would be based on a violation of the obligation of conduct enshrined in Article 208 of the Lisbon Treaty. This is the obligation of EU policymakers to show that they have considered development objectives when adopting a course of action, and have adequately monitored and assessed the effects of their policies on development on an ongoing basis.

This kind of complaint falls within the jurisdiction of the [European Ombudsman](http://www.ombudsman.europa.eu/en/home.faces), as he is mandated to investigate matters of maladministration in EU policy and governance. For the second type of complaint, relative to those policies undermining development objectives, no possible recourse has been envisaged yet.

### c.2) Criticism
The European Ombudsman has no actual power to require the EU institutions to act. Whereas PCD is part of his mandate, it is not his task to function as an institutional advocate or safeguard for development objectives or PCD. Individuals and communities in developing countries who are negatively affected by EU policies still have no institutional channel in order to appeal to EU decision-makers.

### c.3) Recommendations by CONCORD
The EU should:
- Set up a recourse mechanism open to citizens of developing countries who wish to challenge the negative consequences of EU policies on their development, and where a violation of PCD can be demonstrated, to investigate the impact and to review the policy. This will give decision-makers a chance to consider alternative, more development-friendly, policy options;
- Express stronger political will needed to enforce PCD and complaint mechanisms properly within the EU.

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14 The Ombudsman responds to complaints from EU citizens, businesses and organisations, helping to uncover cases of ‘maladministration’ – where EU institutions, bodies, offices or agencies have broken the law, failed to respect the principles of sound administration or violated human rights. The Ombudsman’s office launches investigations after receiving a complaint or on its own initiative. It is completely independent and does not take orders from any government or organisation. More information is available at [http://www.ombudsman.europa.eu/en/home.faces](http://www.ombudsman.europa.eu/en/home.faces)
2.2.4 Redress Mechanisms

The missing link: at present and there is no institutional way of forcing a policy review when incoherencies are detected. Therefore, where there is serious evidence of damage CONCORD recommends that policymakers should investigate the matter in more depth and then start a policy review process, with the intention of revising the incoherent aspects of the policy from a PCD perspective.

2.2.5 How can PCD mechanisms be combined with EU policymaking cycle?

When all the above-mentioned tools and mechanisms are adopted and effective, incoherencies can be tracked during the whole process of EU policy making.

CONCORD Europe elaborated a scheme—see Box 8—that summarizes all the steps in a complete and functioning system. It includes PCD analysis from the policy proposal (ex-ante prevention), to the policy adoption and implementation (coordination, dialogue, monitoring and complaints to detect incoherencies), and includes a redress mechanism that could ultimately lead to policy review.

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**BOX 8 - FOCUS ON:**

**PCD MECHANISMS IN EU POLICYMAKING CYCLE**

- **Prevent incoherencies**
  - Stakeholders’ consultation
  - Ex-ante impact assessment
  - Commission inter-service consultation

- **Policy proposal**
  - Political arbitration at high level in Commission

- **Policy adoption**
  - Inter-institutional relations
  - Political arbitration in EP and council

- **Policy implementation**
  - Multi-stakeholders dialogue on policy impact
  - Filing of complaints

- **Evaluation**
  - New idea/new policy needed

- **Redress incoherencies**
  - Ex-post impact assessment

*Source: Concord Europe, Spotlight on Policy Coherence for Development, 2013 Report*
3. PCD IN THE EU MEMBER STATES
3.1 Policy Coherence for Development in the EU Member States - overview

Although strong commitments towards PCD have been made and a few mechanisms have been put into practice at the European level, it is not easy to obtain similar political engagement by the Member States.

EU Member States should be able to adopt the same PCD elements applied at the European level (political commitments, coordination mechanisms, and monitoring and assessment mechanisms) at the national level as well, keeping in mind that there can be no “one size fits all” model.

A CONCORD survey\(^\text{15}\) drew together the observations of NGOs in seventeen Member States and their analysis of the political and institutional PCD landscape in their countries. The findings have been organised around the above-mentioned three steps - political commitments, coordination mechanisms, and monitoring and assessment mechanisms. As mentioned, they are the key elements of the process that allows for the promotion of policies coherent with development objectives and the detection of policies that contradict them.

EU Member States have made diversified efforts towards the implementation of PCD national strategies, as the following analysis demonstrates – for an overview see Box 9.

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\(^{15}\) The findings are collected in CONCORD Europe’s “Overview of PCD systems in some EU Member States”, 2013 Report

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**Box 9 - Focus on PCD Systems in EU Member States**

**Political Commitments**
- Committed to PCD at a high political level: Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, Lithuania, Luxembourg, Netherlands, Poland, Romania, Slovakia, Sweden, United Kingdom
- Committed to a PCD implementation strategy: Belgium, Lithuania, Netherlands, Sweden
- Committed to PCD political objectives: Netherlands

**Coordination Mechanisms**
- Implemented specific institutional mechanisms for PCD: Finland, Lithuania, Luxembourg, Sweden, United Kingdom
- Implemented general policy coordination and coherence mechanisms*: Belgium, Czech Republic, France, Germany, Hungary, Netherlands, Poland, Romania, Slovenia

**Monitoring and Assessment Mechanisms**
- Implemented impact assessment mechanisms: Finland, Netherlands
- Implemented a system of monitoring and reporting on PCD: Finland, Luxembourg, Netherlands, Sweden

The study is based on surveys conducted by NGOs and it reflects the situation as of September 1, 2013 in the following countries: Belgium, Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Hungary, Lithuania, Luxembourg, Netherlands, Poland, Romania, Slovakia, Slovenia, Sweden and United Kingdom.

Note: the only country participating in the survey that had not implemented mechanisms nor expressed commitments is Bulgaria. Italy was not included in the survey.

* Mechanisms mainstreaming PCD issues without being specific to PCD

Source: CONCORD Europe’s 2013 Overview of PCD systems in some EU Member States
3.1.1 Political commitments in EU Member States

In the countries analysed, a growing number of governments is making strong commitments to PCD (Belgium, Denmark, Finland, Lithuania, Luxembourg, the Netherlands, Sweden, and the United Kingdom). Some countries have made commitments to PCD but not at a high enough political level, which makes implementation difficult (Czech Republic, France, Germany, Hungary, Poland, Romania and Slovakia). Finally, some have still failed to make their commitment to PCD explicit at the national level (Bulgaria and Slovenia); interestingly, Slovenia advocates for PCD at the international level, but has so far failed to commit to it at home.

Sometimes a commitment to PCD depends on the will of the government minister responsible for development, and the analysis shows that in the countries that have made the strongest commitments to PCD, Civil Society Organisations (CSOs) have worked to promote it. Finally, pressure from the international context (EU or OECD) can prove useful for making progress with PCD commitments.

Beside the political commitment, an implementation strategy is also required, as already seen, to deliver effective results. Some countries have adopted an implementation strategy, either formally or informally (the Netherlands, Sweden), some are currently preparing an implementation strategy (Belgium, Denmark and Lithuania), while the other EU Member States analysed do not have any strategy (Bulgaria, Czech Republic, Finland, France, Germany, Hungary, Luxembourg, Poland, Romania, Slovakia, Slovenia and the United Kingdom). Even countries that have adopted strategies for implementing PCD commitments, however, have set no clear and specific political objectives linked to specific non-development policies which could be used to assess and monitor progress made towards PCD in relevant non-development policies. It is therefore important, even after a government has made a political commitment, that CSOs continue to push for the full implementation of PCD.
3.1.3 Monitoring and assessment mechanisms in EU Member States

Only a few countries already have a mechanism for monitoring the implementation of their PCD commitments or plan to set one up. In its new law on development cooperation, Belgium plans to monitor PCD implementation in the context of monitoring its development commitments as a whole and it has committed itself to setting up a consultative body to assess the impact of its policies and to allocate financial and human resources to monitor how its coordination mechanisms operate. The Netherlands and Sweden regularly produce official reports on PCD implementation, focusing mostly on policy intentions, but they do not deepen their analysis to include the actual effects of policies on the ground. In Luxembourg and the United Kingdom, inter-ministerial mechanisms to coordinate work on PCD have been set up, but there is no information about their effectiveness. In conclusion, there is a lack of institutional mechanisms for implementing PCD effectively.

3.1.2 Coordination mechanisms in EU Member States

Coordination mechanisms within a government and its administration, good communication between the different policy sectors (including development) are all key factors to designing coherent policies. The form these mechanisms take varies considerably, depending on the highly specific political cultures involved.

It is significant that, of the countries that have made the strongest political commitments to PCD, only a few have effective coordination mechanisms for implementing it.

Belgium has several coordination mechanisms, but they do not mainstream PCD effectively and Denmark currently has no formal mechanism for promoting PCD across ministries, although its government is working on a national implementation plan.

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 impact. In Lithuania, an interministerial commission coordinated by the ministry of foreign affairs (MFA) has been set up to serve as a coordination mechanism, but it meets irregularly, and the scope and effectiveness of its work is unclear, owing to insufficient transparency so far.

Finland and Sweden, on the other hand, have introduced very ambitious coordination mechanisms for the purpose of PCD (but so far showed limited effectiveness), in Luxembourg and the United Kingdom, inter-ministerial mechanisms to coordinate work on PCD have been set up, but there is no information about their effectiveness. In conclusion, there is a lack of institutional mechanisms for implementing PCD effectively.
3.2 Policy Coherence for development in Italy

The institutionalization of a system for the implementation of policy coherence for development in Italy is still to be achieved. The need for a stronger commitment to PCD and for the inclusion of its mechanisms in the Italian policymaking cycle is expressed and renewed both from international institutions — see Box 10 — and from NGOs and CSOs.

**BOX 10 - FOCUS ON: OECD PEER REVIEW - ITALY**

According to the Organisation for Economic Co-operation and Development (OECD) 2014 Peer Review, Italy has signed on to international commitments on policy coherence for development (PCD), but it has yet to make demonstrable progress. The Peer Review urged Italy to express a high-level political commitment to development-friendly and coherent policies at the national level, as well as to identify key policy areas on which to focus efforts and to develop monitoring and assessment mechanisms to implement PCD.

Overall, as the concept of PCD remains unclear to many actors in the Italian development cooperation system, OECD encourages Italy to rely on the expertise of Italian NGOs, think tanks and research institutions in gathering solid evidence to support inter-ministerial discussions on PCD, as well as raising awareness and better communicating the concept of policy coherence and its issues across government and the broader public.

The previous two peer reviews recommended identifying a lead institution with a clear mandate to address policy coherence for development. Under the Letta government, PCD fell within the political competence of the Vice-Minister of Foreign Affairs, who could raise issues within the government whenever policy initiatives by other ministries were likely to have an impact on partner countries’ development.

According to the OECD, this is a positive step forward, but there is still progress to be made with existing structures. Moreover, no monitoring, analysis and reporting mechanisms for policy coherence for development have been established yet.

*Source: OECD Development Co-operation Peer Review – Italy 2014*
At present, Italy relies on poorly available instruments for the implementation of PCD. Nevertheless, they represent a way forward to a more structured approach to policy coherence for development:

1. an Informal Cross-party Group of Members of Parliament concerned with development co-operation was established in April 2013. It widens support to development co-operation within Parliament and could facilitate the dialogue on PCD.

2. the Inter-institutional Table on development cooperation where issues about PCD are also discussed. In May 2013, within the framework of the Inter-institutional Table, a specific seminar on Policy Coherence for Development was organized, see Box 11.

Box 11 - Focus on: Seminar on PCD at the Italian Inter-institutional Table

The inter-institutional table on development cooperation is an instrument for promoting the participation and consultation about development cooperation issues of many actors, such as national, regional and local authorities, Italian NGOs, CSOs, universities, trade unions, banks and representatives of the business sector.

On May 10, 2013, a seminar was held within the inter-institutional table to focus on issues related to policy coherence for development, with the aim of increasing awareness about PCD, highlighting relevant aspects for PCD in the Italian context, collecting civil society’s inputs and starting a process in line with the OECD’s recommendations expressed in the Peer Reviews.

First, the table expressed concerns for the absence of a debate about PCD in Italy, and stated the necessity to establish an efficient mechanism to measure incoherencies, taking into account feedback from civil society and relying on the European Union for the definition of a clear methodology.

As regards impact monitoring, the table affirmed the possibility of developing a case-study of the impact of Italian PCD at the single country level. This activity will acquire greater importance if built within the framework of the Italian semester of the EU Presidency, because it gives the opportunity to promote the debate at the European level.

The table also recognized that the current situation could be the momentum for the adoption of a PCD policy statement in Italy, as new international events like the Post-2015 debate and the Expo2015 are approaching and the process of development cooperation reform is progressing.

In this context, the important advocacy and awareness-raising role of CSOs has been recognized. Therefore, the table invited Italian civil society representatives to develop a shared policy statement proposal consisting of many stakeholders on Italian PCD, to be released within the context of the inter-institutional table and that could be ultimately adopted at a political level.

Source: The outcome document of the Seminar on PCD held on May 10, 2013 by the Inter-institutional table
A great step forward for policy coherence for development could be achieved with the new law on international development cooperation, approved by the Italian Parliament in August, 2014 that takes PCD into consideration for the first time at the political level in Italy—see Box 12.

**BOX 12 - FOCUS ON:**
**PCD IN THE NEW ITALIAN LAW ON DEVELOPMENT COOPERATION**

The new Italian law on international development cooperation is pivotal for the debate about policy coherence for development, first of all because for the first time it represents an explicit and strong political commitment in this direction in Italy. This law puts more emphasis than in the past on cooperation for development within the greater framework of international policy. It is demonstrated by the fact that the Minister of Foreign Affairs will be renamed the Minister of Foreign Affairs and International Cooperation, and for the first time it is foreseen that the vice minister could take part in the Council of Ministers whenever it deals with issues that might affect, directly or indirectly, the effectiveness of development cooperation policies (Art. 11).

Other important steps that contribute to the establishment of a mechanism for PCD are the creation of:
- an Inter-ministerial Committee for Cooperation and Development (CICS) that will be given the task of programming and coordinating all the activities concerning cooperation and development, as well as coordinating the coherence of national policies and development objectives (Art. 15);
- a National Council for development cooperation, consisting of the main public and private actors, both profit and non-profit, of the international development cooperation sector. The Council will be a permanent instrument assuring participation, consultation and proposals related to development cooperation strategies and in particular to policy coherence (Art. 16);
- a National Agency for Cooperation and Development (AICS), in charge of technical and operational activities, as well as the formulation, financing, management and monitoring of cooperation activities (Art. 17). The Agency should increase effectiveness and coordination for a more appropriate and consistent implementation of policies for development.

**THE NGOS PARTICIPATION**
The role of NGOs, thanks to aggregation and representation bodies such as LINK 2007, AOI, CINI, has played a crucial role in shaping the new law. They asked for:
- pushing the reform of development cooperation forward;
- a stronger role and authority for the National Council, given that it is also in charge of promoting PCD;
- establishing a Single Fund (Fondo Unico) that regroups the resources of development cooperation: this is a crucial tool to assure uniformity, effectiveness and the coherence of financial instruments with the objectives of development;
- beside the acknowledgment of the private sector and corporations as potential actors in development cooperation, setting up clear and specific rules and criteria for the involvement of those for-profit actors to assure that their actions are coherent with the aims of development;
- fostering the Parliament’s power to address and monitor strategies, policies and cooperation activities for development.

Sources: New Italian Law on International Development Cooperation (text as approved on August 1st, 2014 by the Italian Parliament), Open Letter to the Ministries from LINK 2007, AOI, CINI
In the guidelines document for the Italian development cooperation approved in 2014, PCD is mentioned only in relation to the correlated OECD and EU recommendations for Italy to commit to PCD. The document expresses the Italian government’s will to consider these recommendations in its implementation of development activities.

At a sub-national level, policy coherence for development should also be fostered within decentralized cooperation, that form of development cooperation that involves local authorities, in partnership with trader organizations, local citizens’ groups, cooperatives, trade unions, economic and social actors’ organizations, and all types of local organizations, both in developing countries and in the regions of the European Union’s Member States. This kind of cooperation promotes the economic and social development at a local level, and also favours economic internationalization. There is therefore a need for stronger coordination and more information-sharing practices in the different planning and execution phases of the cooperation programs. This system also needs more support when identifying the key actors (both at a central and peripheral level), and stronger collaboration and interaction to achieve more coherent actions – both for national development policies and for developing objectives.

In this regard, one example is represented by the guidelines document for development cooperation approved by the Emilia-Romagna region for the period 2012-2014. In this document, it is specified that the region will follow the recommendations made by the EU towards Members States to strengthen the coherence of the EU non-development policies to development and MDGs-related objectives. In the document it is also expressed the region’s will to promote a multi-sectoral approach in the implementation of complex development cooperation programs, and more specifically, it also highlighted 5 sectors it will prioritize, because they are in line with the PCD principle: fair trade, responsible tourism, corporate social responsibility, consolidation of the role of migrants in cooperation processes and the promotion and strengthening of developing countries’ human capital.

17 Document available at http://bur.regione.emilia-romagna.it/dettaglio-inserzione?i=e99cb23379ab518fcbdb2758700dd093
4. WHICH ROLE FOR CIVIL SOCIETY IN PROMOTING PCD?
4.1 NGOs: What to do?

The momentum behind urging the EU to commit to PCD in a more effective way has never been so strong: European citizens are increasingly challenging the lack of a more stringent regulation on the management of financial flows, and are questioning the impact of the financial system on Europe's own development too.

In times of global crisis, development cooperation and development considerations make sense more than ever: not only for solidarity - a value that lies at the very heart of the foundation of the EU itself - but also for reasons of economic and social stability, international peace and preservation of biodiversity.

Just like prosperity within the EU, improving the living standards of poor people in developing countries is in the EU's interest. In our interconnected world, it would be a mistake to think that the EU could achieve one without the other. Moreover, the growing impact of internal policies in external relations, the increasing non-ODA (Official Development Assistance) financial flows to developing countries, or budgetary constraints in Europe make coordination and coherence issues even more necessary.

At present there is still little knowledge of what PCD is and how it can be institutionalized, therefore awareness raising campaigns and pressure from NGOs and CSOs would consent obtaining stronger commitments and policy statements from policy makers, since one of the current main obstacles of PCD implementation is the lack of political will.

Furthermore, it is crucial that NGOs and CSOs advocate in favour of coordination, assessment and monitoring mechanisms - the key elements that enable a PCD system to function fully and effectively. They must also push for complaint policies, hence playing the role of watchdogs, ensuring coherence among non-development and development policies.

It is also necessary that the actors from civil society, like NGOs, CSOs, research institutes and universities, constantly provide data, evidence, research and analysis on the consequences and spillovers in developing countries of EU policies, and contribute to give voice to people potentially affected by incoherencies – see Box 13.
Development cooperation in Italy has reached a turning point. The new Law on International Development Cooperation, approved in August 2014, the Post-2015 process, the Italian Semester of the EU Presidency and the OECD recommendations represent a great opportunity for Italian NGOs and CSOs to take action and reinforce the activities already in progress. The first point to focus on is an efficient advocacy effort that pushes for a stronger commitment, coordination, participation and the institutionalization of assessment and monitoring mechanisms, namely an effective system for the implementation of PCD.

Italian NGOs have already worked in this direction within the framework of the new law on development cooperation. Coordination bodies as AOI, CINI, LINK 2007, presented their requests for the new law in a letter to the promoting ministries, and this kind of dialogue should continue within the existing Informal Cross-party Group of Members of Parliament concerned with development cooperation – see Box 12.

In the latest OECD Peer Review the role of NGOs is explicitly expressed and they are acknowledged as important partners in providing solid evidence to the debate about PCD and for this will be systematically involved by the Minister of Foreign Affairs – see Box 10.

Within the context of the “MORE AND BETTER EUROPE” project, there are several advocacy activities on thematic issues related to food, migration, agriculture, investments, the role of private actors in development and Post-2015. These activities involve high institutional representatives and represent a good occasion to address civil society’s requests regarding PCD to the policymakers, and to formulate a policy statement proposal (as called for in the PCD seminar during the Inter-institutional table of Development Cooperation – see Box 11) and therefore stronger political commitment. The improvement of existing instruments, such as research and case studies, is also crucial, and NGOs have already focused their attention on some aspects concerning thematic issues – for example agriculture, food security, migration, trade and financial flows for development—and on the implication that such policy choices have on development.

The Italian semester of the European presidency is the right occasion in which to move forward, enlarge and improve the existing studies and research on cases relevant to PCD, favoring the broader participation of NGOs and other civil society’s actors not strictly related to development (such as trade unions, farmers organizations, etc.). Consistently, within the framework of the “MORE AND BETTER EUROPE” project, 4 seminars and 4 publications on PCD about food security, trade and development, financing for development, and migration are foreseen and open to NGO/CSO contributions.

It is also essential to reinforce the skills, tools, and capacities of NGOs, CSOs, local authorities and associations, in order to strengthen their advocacy, awareness-raising, lobbying, dialogue and ability to provide content within the framework of PCD implementation.

With this aim, the “MORE AND BETTER EUROPE” project has developed the present toolkit. Ten territorial capacity building seminars for NGO/CSO operators to debate topics concerning PCD and to give them the instruments to act, advocate and organize campaigns about PCD are going to be carried out from June to December 2014.

To achieve the above-mentioned goals, partnerships are also key. CONCORD Italia actively participates in the CONCORD’s PCD Group. This is fundamental in order to collect the information and to participate, together with other European platforms, in the efforts to reinforce PCD at the European level as well. This kind of collaboration gives the opportunity to acquire new skills, obtain feedback and create new partnerships. To participate, visit: http://www.concorditalia.org/cosa-facciamo/gruppi-di-lavoro/).

Seeing as how no recourse or redress instruments enabling the correction of ex-post detected incoherent aspects have been implemented yet, the crucial importance of mechanisms for preventing incoherencies and for data collecting to assess the impact of non-development policies on development objectives has strongly emerged. They are therefore the most effective instruments currently in use in the EU.
4.2 NGOs: How to act?

As previously highlighted, Italian NGOs and CSOs can play a very important role in different stages of the process that prevents and detects incoherencies.

First, since the concept of PCD is still not very clear in our country, NGOs and CSOs, together with think tanks and research institutions could play an important role in raising public awareness of the issue through information campaigns to explain the dangers of policy incoherencies and how they harm sustainable global development.

They could therefore generate interest, drive attention and consensus of the public and civil society in asking for tools as well as a strong political commitment by policy makers to avoid those incoherencies.

PCD implementation therefore needs strong political will to progress. Civil society must boost political action with advocacy campaigns, underlining the benefits of coherence and the costs of incoherencies and must gather solid evidence to support inter-ministerial discussions on policy coherence for development.

Training tools are essential instruments in order to strengthen NGOs/CSOs’ in-house advocacy actions and monitoring capabilities, and to transfer knowledge to trainers and staff that will enable them to effectively play their role. For this purpose, it is suggested that the present toolkit, together with the following training instruments developed by CONCORD, be used:

a) the “Good Practices guide on Policy Coherence for Development (PDC) for Concord Members”, a practical guide issued by CONCORD which provides examples, lessons learned and instruments useful to advocate for PCD. Some of the aspects the guide deals with are summarized in this paragraph, but we encourage everyone to read the full document (See the enclosed training tool n.1).

According to CONCORD, an effective advocacy action on PCD has to take into consideration the following steps:

1. Choose the PCD issue to focus on:
   As working on PCD requires exploring a number of different policy areas and, by extension, a good understanding of how they work and intertwine both in Europe and in developing countries, it is essential to start choosing a topic to focus on—see Box 14.

BOX 14 - FOCUS ON:
CHOOSE THE RIGHT TOPIC!

Advocacy opportunities and political sensitivities change from one country to another, which is why picking the right battles is essential for your success.

The experience of different European organizations shows that the following elements are important in order to select the right topics to work on:

- Political support and receptiveness;
- Benefiting from political opportunities and processes;
- Capacity and expertise.

Source: Good Practices Guide on Policy Coherence for Development (PDC) for CONCORD members
A good strategy would identify political opportunities at the national or international level – see Box 15 - develop coordinated actions to discuss the concept in international fora, foster the PCD debate in the on-going discussions on the Post-2015 agenda, mobilize a more broad-based political constituency at home, and would include developing countries.

**BOX 15 – FOCUS ON:**
**SEIZE ON POLITICAL OPPORTUNITIES AND PROCESSES!**

Real change requires action and actions usually take the form of policies, laws, guidelines, commitments, etc. Sometimes it can be your work which gives rise to such opportunities, but very often the opportunities present themselves in the form of policy reviews, new laws or other similar processes.

Knowing in advance whether such a process is coming and building-up your strategy and work around that opportunity maximizes the chances of achieving a positive outcome. One way to do it is to get involved in national processes, monitoring the official legislative roadmaps, or through informal contacts with government officials. In other occasions, monitoring EU legislation can also be useful as European Directives influence national legislation in many policy areas.

Source: Good Practices Guide on Policy Coherence for Development (PCD) for CONCORD members

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2. Research:

Research is another important element for NGO and CSO advocacy campaigns. It consists of activities ranging from proper academic research to developing new policy positions and arguments, and includes different types of outputs such as reports, briefings or case studies – see Box 16.
BOX 16 - FOCUS ON: RESEARCH IS KEY!

Choose the type of research that best suits your needs. This requires thinking about your target, objectives and resources.

**Monitoring reports**: one of the most common research tools. They are very useful as a basis for your advocacy at the national level. The PCD BAROMETER (see below) is an example on how monitoring actions can be coupled with advocacy.

**NGOS BEST PRACTICE: A PCD BAROMETER**

In 2003 the Swedish parliament stated that Sweden’s policies in different areas should not undermine the established development goals. A Policy for Global Development (PGD) was approved and Sweden became the first country in the world to adopt a coherent policy for development. However, several Swedish NGOs believe that the position of PGD in decision-making at all levels as well as mechanisms for its implementation must be strengthened. They also believe that more resources should be given to Ministries and other agencies for carrying out impact assessments to evaluate the effects that the pursued policies may have on the development and PGD goals.

With this purpose, within CONCORD Sweden several NGOs worked together to release a report document presenting the **grade of coherence of some governmental policies** in the form of a Barometer. The NGOs decided to focus the **2012 Barometer** on areas where Sweden was not coherent with development objectives, namely security and military armaments, capital flight from poor countries, migration, trade policy and climate. This tool provides a clear **analysis of the current positioning of each policy in terms of coherence** (Green: the government has acted coherently with PGD – Yellow: the government has not acted or has acted both positively or negatively – Red: the government acted against the principles of PGD), and **gives to the NGOs the opportunity to make recommendations** and to suggest changes.

**Case studies/impact studies**: they usually examine a PCD issue from a practical perspective. Most times they are conducted in developing countries.

See *ActionAid’s report on biofuels*

**Briefings**: shorter pieces, usually on a specific issue which draw on existing research rather than original evidence. They can be very useful when it comes to advocacy meetings with policy makers and other stakeholders without much experience.

See *Trócaire Briefing Paper on PCD in Ireland*

**On-going monitoring**: Tracking of parliamentary questions, reports, opinions and amendments on Policy Coherence presented in Parliament. The results of the monitoring are translated into scores and used to provide positive or encouraging feedback to the Parliamentarians involved in them.

See *EVF’s Fair Politics Monitoring*

Source: Good Practices Guide on Policy Coherence for Development (PCD) for CONCORD members
3. Partnership:
One of the main lessons learned by all the different organizations working on PCD is that partnerships are crucial to maximizing the impact of your work. In this sense, they found that building alliances with stakeholders based on the capacity of either party to make a positive contribution to the work of the other was exceptionally helpful.

The concept of partnership includes ad-hoc alliances with experts, like government officials or organizations working in areas outside the development community such as agriculture, climate, or trade, as well as permanent or stable alliances with these or other stakeholders.

4. Engage the audience:
Campaigning on PCD aims to convince your audience, and in many cases to target decision-makers – through letters, dialogue, participation in inter-institutional tables and meetings featured by the media, but much of the content should also be relevant to other audiences.

b) the “Policy Coherence for Development Training” of trainers, both handbook and slides (CONCORD’s slides, have been adapted for the purpose of this toolkit, including further content specifically developed here) and we invite you to read them carefully as well. They have been developed according to a strong pedagogical approach to equip trainers to transfer skills and competencies to NGOs’ and CSOs’ operators (See the enclosed training tools n.2 and n.3).
For more Information about PCD

Institutional Framework Documents:

European Commission:


For more information about Migration and Development: the fourth chapter is dedicated to Migration. It is a complete analysis on the Commission itself, on the different issues related to migration and development cooperation: from political dialogue with third countries to the brain drain problem, to the role of Diaspora, labour migration, remittances, asylum, security problems and the international protection measures.


European Council:

The 2013 Council Conclusions confirm the EU’s political engagement to PCD, welcome the increased political engagement and institutional capacity to enhance PCD in some Member States. The Council also recognizes that progress has been made in terms of promoting independent assessments and strengthening PCD at country level, even if further progress is needed. The role of EU Delegations in providing feedback on issues relating to PCD is emphasized and the Commission and the EEAS are encouraged to continue their efforts and report further on PCD processes and initiatives at country level, including strengthening the dialogue with local stakeholders regarding the impact of EU policies. The Council also notes that more efforts and political will are needed to anchor PCD more strongly on debates on global issues and challenges, including the discussions on a Post-2015 framework. The Conclusions call for the promotion of a more evidence-based approach towards PCD, including the quantification of the costs of incoherencies for selected cases, the strengthening of existing EU’s ex-ante impact assessments development dimension and the increasing of research efforts on PCD. The Council reiterates its decision to focus on five PCD challenges: trade and finance, climate change, food security, migration and security and calls on the Commission and the EEAS to develop, in cooperation with Member States, an overview of forthcoming policy proposals and initiatives relevant to PCD on the basis of the annual Commission’s work programmes to be shared with the relevant Council bodies starting in early 2014 and onwards, as well as encourages the Commission and the EEAS to develop a longer-term programme that would focus on areas where the EU can act as an agent of change and where concrete results can be achieved on the basis of clear political objectives. The Conclusions also underline that the new PCD work programme should also take into account, as appropriate, issues emerging from the post-2015 framework.


The Council Conclusions on policy coherence between development and migration policies as of November 20, 2007 is the first political document expressing the major guidelines to strengthen the capacity of countries of origin and transit countries in the management of migratory flows, in facing the demand for mobility, the brain drain problem, and to increase the value of remittances and Diaspora.
European Parliament:

Italy:
Tavolo Interistituzionale della Cooperazione allo Sviluppo (2013), Introduzione alla coerenza delle politiche per lo sviluppo: sfide italiane, assetti e casi di studio, Seminar on PCD (see Box 11).

OECD:
The 2014 OECD Peer Review analyses the Italian political and economic context, reports the main finding and several recommendation for Italy in the development and cooperation areas, as a comprehensive development effort, a policy vision and strategic orientations, ODA allocations, delivery modalities and partnerships for quality aid, transparency and accountability. According to the OECD, Italy has signed on to international commitments on PCD, but it has yet to make demonstrable progress. Overall, the concept of PCD remains unclear to many actors in the Italian development cooperation system, and the OECD encourages Italy to rely on the expertise of Italian NGOs, think tanks and research institutions in gathering solid evidence to support inter-ministerial discussions on PCD. The establishment of an informal cross-party group of members of parliament concerned with development co-operation in April 2013 might also go a long way towards facilitating dialogue on PCD in parliament.


Other Documents:


This Working Paper, realized by several authors for the Global Development Center, applies the Development Index (CDI) methodology to measure the coherence of European policies, in particular that of Member States, towards development issues. A chapter is dedicated to migratory policies, specifically the ones related to unskilled immigrants, refugees and asylum-seekers.


CFSI, GRET (2014), *Droits humains et développement : Comment réduire les impacts négatifs des politiques européennes sur les pays du Sud?*


This guide builds on some examples to convey the message that advocating for PCD is possible and to show how others have done it, thanks to adequate planning, research, partnering and a good communication towards the advocacy targets. Several European policies, in particularly sensitive areas, can turn to be incoherent with the European development assistance objectives. The concept of PCD is the political response to this contradiction promoting the harmonisation of European policies with the development goals of third countries. Despite its importance, the concept of PCD is only slowly beginning to be mainstreamed into the policies of the EU and EU Member States. Changing the approach to policy-making takes some time, and there are also strong interests to overcome in most policy areas that undermine developing countries’ development opportunities. In spite of these obstacles, many European civil society organisations have already explored many of these issues and campaigned and advocated for PCD with a significant level of success, and this guide gives some useful tips and ideas on how to start acting in the right way.


This report underlines how designing coherent policies is not always an easy task even if PCD is now a treaty obligation within the EU, and it identifies three elements that are key to establish a PCD delivery strategy at national level: political commitments, an implementation strategy with clear political objectives, coordination, monitoring and assessment mechanisms. The report summarizes the findings of an analysis made in several countries, among which a growing number of governments are making strong commitments to PCD, others have made commitments, but not at a high enough political level, making implementation difficult, and some have still failed to make their commitment to PCD explicit at national level. The report’s findings also show that pres-


ECDPM and ICMDP’s analysis offers a framework on the issue of policy coherence between development and migration at International and European level, an focuses on European and national policies of 11 Member States, including Italy.


IMVF, EVF, Globopolis, Eesti People to People, Cape Verdian Platform of NGOs (2012), EU Member States on the road towards more Policy Coherence for Development (PCD), available at http://bit.ly/1vLlMYv

In this report, Cercle de Coopération collects some views about PCD of policy makers from Luxemburg, and presents a barometer with several incoherent policies highlighted and their recommendations. The topics that are mentioned are the climate policy, biofuels, clearing funds, public procurements, trade, GGM and finance speculation.


The policy brief of Katseli, Lucas and Xenogiani analyses from the European perspective the debate about policy coherence enhanced by the OECD from 2005 that included also issues about migration. The document considers the expected tendencies and the necessity to integrate migrations in development strategies, in order to improve migratory flows' management.


The International Organization for Migration published a study dealing with policy coherence and examples of working-level policies and practices from different countries, Italy included. The main issues the document focuses on are: the management of labour migration, the brain drain and brain waste problems, remittances, the role of Diaspora in the knowledge transfer and in investments, the return and reintegration.


Caritas Europe in the Social Watch Report criticizes the EU’s policies, that from one side support migrations as a development factor, on the other side apply security measures to the European borders, resulting in an incoherent approach.


9 national NGOs platforms analyzed critically the policy coherence for development. The report includes case studies to illustrate the coherence between development cooperation and non-development policy areas. The case studies relative to Estonia and Slovenia concern migratory policies.

Useful Websites:

AidWatch: http://www.concordeurope.org/campaigns/aidwatch

CONCORD Europe: http://www.concordeurope.org/coherent-policies

CONCORD Italia: http://www.concorditalia.org/


Fair Politics: http://www.fairpolitics.eu/fair_politics/policy-coherence-for-development

OECD: http://www.oecd.org/development/pcd/
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