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COMMISSION STAFF WORKING DOCUMENT

Evaluation of the EU Policy Coherence for Development

{SWD(2019) 93 final}

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1. INTRODUCTION

1.1 Purpose of the evaluation

This staff working document presents the Commission assessment of the findings and conclusions of the external evaluation of the European Union (EU) approach to Policy Coherence for Development (PCD)¹.

The evaluation assesses:

- the extent to which the EU has taken account of the objectives of development cooperation in those of its policies that are likely to affect developing countries and
- the extent to which this has contributed to reducing poverty, in line with Art. 208 of the Treaty on the Functioning of the EU, and promoting sustainable development.

The external evaluation was carried out in response to calls expressed by the Council of the EU and the European Parliament, both of which have stressed the need for the EU to invest more resources in evidence-based analysis of PCD and the development impact of key policies, and asked for an independent assessment of progress to further improve monitoring, implementation and follow-up². Moreover, the Commission considers greater coherence among all EU policies in support of development as essential.

The external evaluation provides EU institutions, Member States, civil society organisations, academia, think tanks and the private sector with a comprehensive assessment of the EU's approach to PCD over the in the period 2009-2016.

The external evaluation should allow the EU and its Member States to take stock of the lessons learnt on PCD and, together with the 2019 EU report on PCD recently published³, inform future work, in particular in view of new challenges posed by the

¹ See external evaluation report on: https://ec.europa.eu/europeaid/external-evaluation-european-unions-policy-coherence-development-2009-2016_en (and also Annex 3)

² See Council Conclusions on PCD of 14 May 2012 and 12 December 2013 (<http://data.consilium.europa.eu/doc/document/ST-9373-2012-INIT/en/pdf>; <http://data.consilium.europa.eu/doc/document/ST-17670-2013-INIT/en/pdf>) as well as EP resolutions on PCD of 13 March 2014 and 7 June 2016 (<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P7-TA-2014-0251+0+DOC+PDF+V0//EN>; <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P8-TA-2016-0246+0+DOC+PDF+V0//EN>)

³ https://ec.europa.eu/europeaid/policies/policy-coherence-development_en

implementation of the 2030 Agenda for Sustainable Development⁴ and the new European Consensus on Development⁵.

1.2 Scope of the evaluation

The external evaluation covers the period 2009-2016. More recent information on actions implemented by the Commission in 2017-2018 is also included, to the extent possible. The adaptation of the EU approach to PCD to the 2030 Agenda took place mostly as from 2017, following the adoption of the new European Consensus on Development.

The external evaluation takes into account all PCD activities likely to have an impact on developing countries. However, the focus is on Least Developed Countries with particular attention to Sub-Saharan countries and Fragile States as they are the EU's geographical priorities in terms of development cooperation. The external evaluation centres on the work of the Directorate-General for International Cooperation and Development of the Commission and the European External Action Service (EEAS) in collaboration with the Commission services concerned by the five PCD strategic challenges identified in 2009⁶.

In order to address the two overarching questions mentioned in section 1.1 the external evaluation assesses the EU approach to PCD at three levels:

- (1) implementation of tools and mechanisms put in place to enhance PCD in 2009-2016, and their functioning with respect to the five PCD strategic challenges;
- (2) with respect to selected non-development initiatives/policies, the influence that PCD tools and mechanisms have had on the decision-making process and other outputs;
- (3) on the basis of selected case studies, the extent to which changes in the design and implementation of non-development initiatives/policies, as a result of incorporating a PCD approach, influenced outcomes and impact in developing countries, with a focus on Least Developed Countries.

In accordance with the OECD Development Assistance Committee evaluation guidelines⁷, the EU methodological guidelines and the Better Regulation Guidelines⁸, the

⁴<https://sustainabledevelopment.un.org/content/documents/21252030%20Agenda%20for%20Sustainable%20Development%20web.pdf>

⁵ https://ec.europa.eu/europeaid/new-european-consensus-development-our-world-our-dignity-our-future_en

⁶ 1) Trade and Finance, 2) Addressing climate change, 3) Ensuring global food security, 4) Making migration work for development, and 5) Strengthening the links and synergies between security and development in the context of a global peace building agenda

⁷ <http://www.oecd.org/dac/evaluation/dacriteriaforevaluatingdevelopmentassistance.htm>

⁸ http://ec.europa.eu/smart-regulation/guidelines/docs/br_toolbox_en.pdf

following evaluation criteria have been applied: relevance, effectiveness, efficiency, impact and sustainability, coherence and EU added value⁹.

2. BACKGROUND

2.1 Description of PCD and its objectives

The concept of PCD emerged in international discourse in the early 1990s against a background of increasing global challenges and growing concerns as to the effectiveness of development aid and the need for donors to be coherent and consistent in their activities, in particular in view of trade-distorting export subsidies for agricultural products in developed countries and their negative effects on local production in developing countries.

There is no single agreed definition of PCD. It is widely accepted that it means that, when pursuing domestic policy objectives, negative consequences and spill-overs likely to adversely affect developing countries should be limited ('do no harm' approach). Over time more emphasis was put on actively looking for ways to exploit the potential synergies to increase potential positive impact ('synergies' approach).

The EU enshrined the principle of PCD for the first time in the Maastricht Treaty in 1992. It has since had a legal commitment to promote PCD. The provision was almost unchanged in Art. 208 of the Treaty on the Functioning of the EU, following the entering into force of the Lisbon Treaty:

“The Union shall take account of the objectives of development cooperation in the policies that it implements which are likely to affect developing countries”.

In the same paragraph, the Treaty defines the primary objective of EU development cooperation policy as ‘the reduction and, in the long term, the eradication of poverty.’

The EU thus recognises that some of its domestic policies have external impacts that can either contribute to or undermine its development policy. The EU should consequently seek to gather information on the nature and scale of those impacts, and strive to minimise inconsistencies and, where possible, create synergies between policies.

Political commitment to PCD was first embedded in the European Consensus on Development of 2006. It was then reiterated in the 2017 new European Consensus on Development, which provides a shared vision on development policy for the EU and its Member States.

In May 2005 the EU had already undertook to track progress on PCD in 12 policy areas: trade, environment, climate change, security, agriculture, fisheries, the social dimension of globalisation, employment and decent work, migration, research and innovation, the

⁹ https://europa.eu/capacity4dev/evaluation_guidelines/minisite/en-geographic-thematic-and-other-complex-evaluations

information society, transport and energy and to give account of it through regular reports¹⁰.

As a response to global the economic crisis, in 2009, the EU further strengthened its approach to PCD stressing the need to do more to harness synergies between relevant EU policies with a view to supporting developing countries' efforts to achieve the Millennium Development Goals by 2015.

Over the years, the EU has gradually stepped up its work on PCD tools and mechanisms to construct an operational framework for implementing its approach to PCD. Some of these tools and mechanisms are not specific to PCD but are general instruments used as part of the Commission's policy-making process, such as inter-service consultations and impact assessments. Others are specific to PCD and have been developed to improve coordination and consultation with stakeholders or to track progress, raise awareness and build capacity on PCD. The Commission coordinates the policy debate on PCD with the other EU institutions, Member States and civil society organisations. It organises twice a year a meeting of an informal network of PCD focal points from EU Member States to share information on activities and good practices. The Commission registers progress on the promotion of PCD at EU level, mainly through regular EU Reports on PCD. The first report was published in 2007 and the most recent one in January 2019, covering the period 2015-2018¹¹. Every report is followed-up by the Council¹² through its conclusions and, since 2010, by the European Parliament¹³, which gives its opinion in a resolution. In addition, a PCD Work Programme was adopted for the period 2010-2013. It translated the political principle of PCD into an operational framework to guide the work of the Commission and the High Representative, and as a reference for Member States' own PCD work. In 2015, the Commission also introduced an annual reporting on PCD from EU delegations with a view to gather information on the impact of EU policies on partner countries.

Member States are responsible for promoting PCD in their national policies and at EU level, and some have their own mechanisms in place. The Council of Ministers has devoted more attention to PCD in recent years, discussions on PCD-related issues in working parties and ministerial meetings have covered a wide range of issues, including migration, fisheries, food security and conflict minerals.

¹⁰ PCD reports published between 2007 and 2019 can be found at:
https://ec.europa.eu/europeaid/policies/policy-coherence-development_en

¹¹ All the EU PCD Reports published between 2007 and 2019 can be found at
https://ec.europa.eu/europeaid/policies/policy-coherence-development_en

¹² See latest Council conclusions at <http://data.consilium.europa.eu/doc/document/ST-13202-2015-INIT/en/pdf>

¹³ See latest Parliament resolution at <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2016-0246+0+DOC+XML+V0//EN>

2.2 Intervention Logic

For evaluation methodological purposes, the specific intervention logic of the EU's approach to PCD was reconstructed and is presented below (Figure 1)¹⁴.

Key assumptions

The first group of assumptions at the level of inputs relates to the existence of political will and institutional support within the EU to promote an EU approach to PCD, and the existence of organisational structures and expertise within the Commission and the EEAS¹⁵. It is assumed that the continuous existence of these conditions for the period under evaluation would lead to PCD being mainstreamed into the policy-making process and thinking of the relevant stakeholders¹⁶.

The second group of assumptions relates to the operational framework (activities) for PCD at EU level. The functioning of PCD mechanisms (whether or not PCD specific) should lead to effective cooperation and coordination between EU institutions and stakeholders¹⁷. This assumption relies on the underneath assumption that there is a consistent and shared understanding and commitment amongst Commission services and the EEAS regarding PCD¹⁸. Taken together, these assumptions support another assumption, at the level of outputs, namely that the PCD process contributes to enhancing and reinforcing PCD in EU's policy-making¹⁹. As for the level of outcomes, the assumption is that PCD is fully in line with EU and Member States interests and commitments²⁰.

The intervention logic focuses on activities mainly by the Commission and the EEAS in the promotion of PCD and consists of five causally linked levels:

- 1) inputs on PCD within the structure of the EU;
- 2) activities involving Commission services, EEAS and other PCD stakeholders, directly or indirectly affect the outputs;
- 3) main outputs and supporting output affecting the intermediate objectives of the EU approach to PCD;
- 4) outcomes expected to contribute to the overall objective of PCD; and
- 5) contribution to increased impact on poverty reduction and sustainable development in partner countries.

¹⁴ See Annex 1. Also, methodological notes in annex to the external evaluation report can be found at: https://ec.europa.eu/europeaid/external-evaluation-european-unions-policy-coherence-development-2009-2016_en.

¹⁵ With reference to the external evaluation question 3

¹⁶ With reference to external evaluation question 8

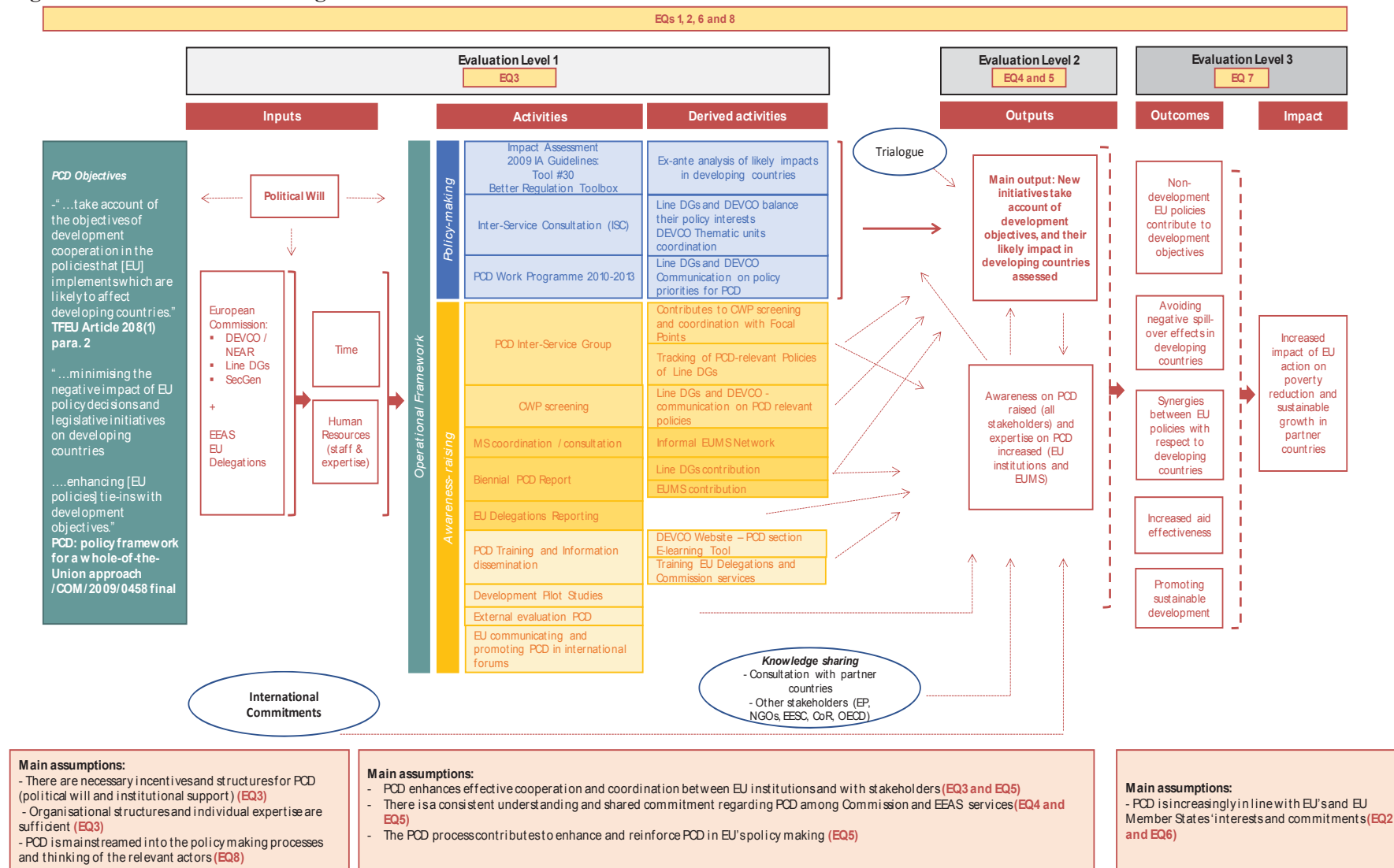
¹⁷ With reference to external evaluation question 3 and evaluation question 5

¹⁸ With reference to the external evaluation question 4 and evaluation question 5

¹⁹ With reference to the external evaluation question 5.

²⁰ With reference to the external evaluation question 2 and evaluation question 6.

Figure 1: PCD Intervention Logic²¹



²¹ This intervention logic was reconstructed to serve the external evaluation methodological purposes base.

2.2.1 Activities

The PCD tools and mechanisms at the core of the EU's PCD operational framework have been classified into two categories:

- **Policy-making mechanisms:** they consist mainly of inter-service consultations and impact assessments. They are not specific to PCD but have been put in place by the Commission to ensure the inclusion of all relevant departments in the policy formulation process. In the context of the EU's approach to PCD, they allow to take account of the interests and needs of developing countries before a new policy is adopted. They contribute directly to the main expected output of PCD: "new initiatives take account of development objectives, and their likely impact in developing countries is assessed". Policy-making mechanisms also include one PCD-specific mechanism – the 2010-2013 PCD Work Programme for the period 2010-2013 (which included indicators, targets and objectives for each PCD challenge area).
- **Awareness-raising mechanisms:** they consist of PCD-specific activities coordinated by the Commission Directorate General for International Cooperation and Development: the PCD biennial report; the PCD Training; the screening of the Commission Work Programme to identify key policy initiatives that may have an impact on developing countries; consultation with developing countries; reporting from EU delegations; and the EU Member States informal network. These activities do not contribute directly to policy-making and contribute only in a limited way to monitoring.

2.2.2 Outputs

The above activities are expected to lead to the following outputs:

- **main output:** likely impacts of new initiatives on developing countries are assessed and development objectives are taken into account. This explicitly mirrors PCD's primary objective, and all PCD mechanisms are expected to contribute to achieving it (directly, in the case of the policy-making and indirectly, in the case of awareness-raising mechanisms).
- **supporting output:** awareness is raised among all PCD stakeholders and expertise on PCD is increased in EU institutions and Member States. This output is also expected to contribute to the achievement of the main output.

2.2.3 Outcomes and impact

The EU approach to PCD should contribute to the following outcomes:

- non-development EU policies contribute to development objectives;

- negative spill-over effects in developing countries are minimised;
- synergies are generated between EU policies with respect to developing countries²²;
- aid effectiveness is enhanced;
- sustainable development is promoted globally.

Together these five outcomes should contribute to the increased impact of EU action on poverty reduction in developing countries.

2.3 Baseline

The starting point of the external evaluation is set at November 2009, when the Council adopted its conclusions on PCD²³. These conclusions established a new, more strategic and targeted approach to PCD, including the definition of five priority areas (trade and finance, climate change, food security, migration, security) and the introduction of the PCD work programme as a tool to guide the EU and Member States common effort in promoting PCD, between 2010 and 2013.

3. METHOD

3.1 Description of methodology

The external evaluation follows the approach set out in the roadmap published in April 2016²⁴ and was carried out on behalf of the Commission from September 2016 to June 2018²⁵. The external evaluation was followed closely by an inter-service group consisting of representatives of all relevant Commission services and the EEAS whose main task was to contribute ensuring the quality of the contractors' work and facilitating relevant information.

The external evaluation included targeted consultations of stakeholders such as Commission services and the EEAS, EU Member States, EU delegations and civil society representatives. In addition, the Commission conducted a 14-week internet-based open public consultation, whose results have been consolidated by the external evaluation team (see also Annex 2).

²² This outcome reflects the evolution from a 'do no harm' approach, which focused on minimising the adverse impact that non-development policies have on developing countries, to seeking mutually reinforcing policies.

²³ See Council Conclusions on Policy Coherence for Development - 17.11.2009

http://www.consilium.europa.eu/uedocs/cms_Data/docs/pressdata/en/gena/111278.pdf

²⁴ See http://ec.europa.eu/smart-regulation/roadmaps/docs/2018_devco_001_evaluation_pcd_en.pdf

²⁵ See Annex 3

The evaluation consist of three stages:

- **Stage 1 – Implementation of PCD and functioning of PCD tools and mechanisms:** this involved mapping policies and other initiatives and describing the work done on PCD-related issues; a number of PCD activities and relevant policies and initiatives were selected for further analysis in Stage 2 (see Tables 1 and 2) .

Table 1: Selection of PCD tools and mechanisms

No	PCD activity
1	Biennial Report
2	Impact Assessments (IAs)
3	PCD Training Activities
4	Commission Work Programme (CWP) Screening for PCD relevance
5	Inter-Service Consultation (ISC)
6	Consultation with developing partner countries
7	EU Delegations (EUD) reporting
8	Informal EU Member States Network

Table 2: Selection of policies and initiatives

No	PCD-related policy/initiative	Year	PCD challenge
1.	Common Agricultural Policy (CAP) (reform 2013)	2013	Ensuring global food security
2.	Generalised Scheme of Preferences (GSP)	2012	Trade and finance
3.	Trade for All Communication	2015	Trade and finance
4.	EU Action Plan against Wildlife Trafficking	2016	Addressing climate change (biodiversity and environment protection)
5.	Common Fisheries Policy (CFP) (reform 2013)	2014	Ensuring global food security
6.	Country-by-Country Reporting (CBCR)	2013	Trade and finance
7.	Raw Materials Initiative (RMI)	2008	Strengthening the links and synergies between security and development
8.	Global Approach to Migration and Mobility (GAMM)	2011	Making migration work for development
9.	Digital Single Market (DSM) Strategy	2015	Trade and finance
10.	Review of the EU Blue Card directive	2016	Making migration work for development
11.	Responsible sourcing of minerals originating in conflict affected and high-risk areas	2014	Strengthening the links and synergies between security and development
12.	A policy framework for climate and energy period 2020-2030	2013	Addressing climate change
13.	Fourth Anti-Money Laundering (AML) Package	2013	Trade and finance; Strengthening the links and synergies between security and development

- **Stage 2 – Evaluation of the outputs of PCD processes on selected EU initiatives:** the outputs produced by PCD tools and mechanisms in the context of the 13 selected policies and initiatives were analysed to gauge their influence on the relevant decision-making processes. A more limited number of case studies (sub-areas and countries) was identified for the evaluation of outcomes and impact in Stage 3.

- **Stage 3 – Evaluation of outcomes and impact based on agreed field case studies:** field visits were conducted to assess the outcomes and - where possible - impacts for four selected case studies (see Table 3).

Table 3: Policies and countries selected for case studies

PCD-related policy	Countries
Generalised Scheme of Preferences (GSP)	Mozambique Vietnam
EU Action Plan against Wildlife Trafficking	Kenya Burkina Faso
Common Fisheries Policy (CFP) (reform 2013)	Senegal Mauritania
Global Approach to Migration and Mobility (GAMM)	Cape Verde Armenia

This staff working document mainly relies on the external evaluation and its findings and conclusions, unless stated otherwise. Other sources of evidence used include the OECD/DAC Peer Reviews of the EU of 2012 and 2018²⁶ and the 2019 EU Report on PCD.

3.2 Limitations and robustness of findings

The external evaluation limitations and constraints were:

- **oral/informal process prior to policy formulation:** discussions preceding the decision to include or exclude development considerations in a specific Commission proposal or in the final version of the policy were not systematically well documented, and this made it difficult to identify the contribution of PCD-related mechanisms. The evaluation team had to rely mostly on interviews in order to understand the role played by various services and mechanisms during oral/informal exchanges relating to the selected policies.
- **high staff turnover:** policy officers involved at the policy formulation stage had often moved to another service/position, making it challenging for the evaluators to fully grasp the context of the policy formulation. To mitigate this, the evaluators increased the number of services and policy officers interviewed.
- **lack of clear definition of PCD outputs:** the lack of a shared definition of PCD has complicated the identification of concrete PCD outputs. The evaluators considered it necessary to interpret the selection criteria for the analysis of impact outlined in the terms of reference (based on the “availability of concrete PCD outputs to be able to explore further causality links to outcome and impact”). They used a broader definition of the PCD “principle” under which main PCD

²⁶ 2012 OECD DAC Peer review EU at <http://www.oecd.org/dac/peer-reviews/50155684.pdf>; 2018 OECD DAC Peer review EU at <http://www.oecd.org/dac/peer-reviews/oecd-development-co-operation-peer-reviews-european-union-2018-9789264309494-en.htm>

outputs are not necessarily linked to the application of EU's PCD-related mechanisms during policy formulation, but to any EU non-development policy subject to development considerations or with development cooperation objectives. The inter-service group supporting this evaluation has accepted this modification on the basis that it was in line with the practice of the biennial PCD reports.

- **limits to the causality analysis of PCD impact:** the main challenge stemmed from the complexity of isolating the expected effects of an EU non-development policy incorporating an approach to PCD at the level of outcomes and impact. There is yet no agreed methodology for measuring the impact of PCD, since the elaboration of baselines, targets and indicators is still in its infancy. The difficulties that the evaluators would face in finding robust evidence on the relationship between PCD and results at outcomes and impacts were acknowledged. Thus, it was proposed that the analysis be based on available studies and data selected for case studies in partner countries. The evaluators consequently developed the methodology for the assessment in a combination of the specific case studies selected prior to the field phase, and a meta-analysis of existing studies per selected policy/country and a qualitative assessment based on field visits and stakeholder interviews. This methodology, including the proposed set of indicators for each of the selected policies to be analysed during the field phase, was reviewed and approved by the inter-service group supporting this evaluation.

4. STATE OF PLAY

Description of the current situation

In 2015, target year of the MDGs, the international community adopted a new global framework for action on poverty eradication and sustainable development with wide-ranging implications. The agreement on a post-2015 framework signalled a transition to a universal development agenda addressing inter-connected global challenges and setting 17 Sustainable Development Goals (SDGs) for all countries in the world, to be implemented by 2030 (Agenda 2030).

These was reflected in the new European Consensus on Development, which provides the EU institutions and Member States with a new framework for a common approach to development policy. The new Consensus sets out an integrated approach to the economic, social and environmental dimensions of sustainable development and seeks to ensure that the EU plays its part in supporting partner countries' achievement of the SDGs.

Stressing the links between development and other policies, the new Consensus reinforces the approach to PCD:

“PCD is a fundamental part of the EU's contribution to achieving the SDGs.”

The PCD chapter of the new Consensus foresees that:

“(PCD will be applied) across all policies and all areas covered by the 2030 Agenda, seeking synergies, notably on trade, finance, environment and climate change, food security, migration and security. Particular attention will be given to combating illicit financial flows and tax avoidance, and to promoting trade and responsible investment. (...) Sustainable development requires a holistic and cross-sector policy approach and is ultimately an issue of governance which needs to be pursued in partnership with all stakeholders and on all levels. The EU and its Member States will therefore promote whole-of-government approaches and ensure political oversight and coordination efforts at all levels for SDG implementation.”

From 2017, - the end of the external evaluation period, - the Commission has taken actions to adapt the EU approach to PCD to the 2030 Agenda to make sure it remains relevant in such an evolving policy framework. It broadened its focus on PCD beyond the traditional five PCD strategic challenges to reflect the new dynamics of the SDGs. It also integrated PCD into the overall Commission work on the implementation of the 2030 Agenda.

Commission services are now working together on PCD in an inter-service steering group on the SDGs. The group gathers representatives from all relevant Commission services and coordinates work on sustainable development.

In January 2019, the Commission has released the 2019 EU Report on PCD. The report is meant to illustrate clearly the EU and Member States contributions to support the achievement of the SDGs in partner countries in the identified priority areas. PCD is no longer perceived as being a stand-alone policy specific to development cooperation, but a key element in the overall EU efforts to implement the 2030 Agenda. The reporting on PCD has consequently been closely linked to the Reflection Paper “Towards a sustainable Europe by 2030”²⁷ as a key element of overall EU efforts to implement to 2030 Agenda.

²⁷ https://ec.europa.eu/commission/files/reflection-paper-towards-sustainable-europe_en

5. ANALYSIS AND ANSWERS TO THE EVALUATION QUESTIONS

Table 4 provides an overview of the Evaluation Questions (EQs). Some EQs (EQ1, EQ2, EQ3, EQ6, EQ7, and EQ8) address a single criterion and others (EQ4 and EQ5) cover more than one criterion. For each question, the correspondence with the evaluation levels and evaluation criteria is also included.

Table 4: Overview of EQs, evaluation levels, and evaluation criteria

EQ No.	EQ	Evaluation Level	Evaluation Criteria
1	To what extent has the EU PCD approach and its operational framework responded to evolving needs?	Levels 1, 2, and 3	▪ Relevance
2	To what extent has the EU PCD approach been aligned with wider EU policy and evolving international obligations of the EU?	Levels 1, 2, and 3	▪ Coherence
3	To what extent have PCD inputs and activities been adequate to implement the EU PCD approach?	Level 1	▪ Efficiency
4	To what extent has the EU PCD approach (PCD specific mechanisms) led to raised awareness on PCD, which in turn has indirectly influenced policy-making?	Level 2	▪ Effectiveness ▪ Efficiency
5	To what extent has the EU PCD approach influenced existing or planned policies/initiatives likely to affect developing countries so that they take into account development objectives?	Level 2	▪ Effectiveness ▪ Efficiency
6	To what extent has the EU PCD approach created additional value beyond what could be achieved by EU Member States acting independently?	Levels 1, 2, and 3	▪ EU Added Value
7	To what extent have changes in the design and implementation of EU policies and initiatives brought about by incorporating a PCD approach influenced outcomes and impacts in developing countries?	Level 3	▪ Impact
8	To what extent is the EU PCD approach sustainable?	Levels 1, 2, and 3	▪ Sustainability

5.1 Relevance

EQ1: To what extent has the EU approach to PCD and its operational framework responded to evolving needs?

The evaluation confirms that the EU's approach to PCD remained relevant at the strategic level throughout the period 2009-2016. It adapted to evolving challenges and changing needs in the international context. This is evidenced in particular in the context of increased efforts to achieve the Millennium Development Goals by 2015 and the EU's response to the 2030 Agenda. In 2009, the EU already introduced a more strategic and targeted approach to PCD. It directed PCD efforts to five priority areas (trade and finance, food security, climate change, migration and security) in order to build political impetus to accelerate progress towards the Millennium Development Goals. The Commission has also adapted its approach to PCD to the new post-2015 policy framework for sustainable development. The new European Consensus on Development recognises PCD as a crucial element of the EU strategy to achieve the SDGs in partner countries and as an important contribution to the broader objective of Policy Coherence for Sustainable Development, to which SDG 17 refers as a means of implementation of the 2030 Agenda. Accordingly, the Commission has integrated PCD in its overall work related to implement the SDGs.

The Commission continuously improved its tools and mechanisms to promote PCD and introduced new ones to complement them. For instance, in 2015, the Better Regulation, in its guidelines on impact assessments, provided a specific guidance on how to assess possible impacts on developing countries²⁸. It improved these guidelines further in 2017 by replacing the term ‘impact on third countries’ by a more accurate ‘impact on developing countries’.

The Commission also improved reporting on PCD by EU delegations, in recognition of their key role in providing headquarters with feedback on the impacts of EU policies on partner countries. In 2015, a sub-chapter on PCD was included in the annual External Assistance Management Report to be submitted by EU delegations, and the requirements for this sub-chapter were continuously improved from 2016 to 2018.

The inclusion, as from 2017, of PCD in the work of the inter-service steering group on the SDGs significantly improved the involvement of the Commission Directorate General for International Cooperation and Development in the impact assessments prepared by other Commission services.

However, there is still room for improvement, notably by developing a common understanding of the PCD concept for staff across Commission services (which is currently lacking as shown by interviews and surveys carried out) and by ensuring that inter-service consultations involve all relevant Commission services.

Field missions confirmed the limited knowledge of PCD in EU delegations and the low awareness of their role in promoting PCD in partner countries. The e-learning training module on PCD launched in 2016 improves their knowledge and awareness of PCD.

The external evaluation indicated that the EU’s approach to PCD was not fully adapted to institutional changes that came about over time, particularly with the entry into force of the Treaty of Lisbon in December 2009. However, this is now mitigated by the wide institutional participation in the inter-service steering group on SDGs, since 2017.

5.2 Coherence

EQ2: To what extent has the EU approach to PCD been aligned with wider EU policy and evolving international obligations of the EU?

The EU’s approach to PCD is now well aligned with wider EU policy, in particular those sectoral policies that cover the five PCD priority areas as identified in 2009 (trade and finance, food security, climate change, migration and security), and the EU’s international commitments in those areas.

²⁸ See Better Regulation Toolbox, Tool #34 on Developing Countries (https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-34_en_0.pdf)

Some policies gradually embraced the approach to PCD, and, in some cases, quite early in their formulation process due to their scope and likely prominent impact on developing countries.

In 2012, the “Trade, growth, and development”²⁹ Communication referred explicitly to the EU’s PCD principle and proposed concrete steps to “enhance synergies between trade and development policies”. The 2015 “Trade for All” strategy made explicit reference to the need to align EU trade and investment initiatives with the principle of PCD and announced a number of actions that use trade and investment to support inclusive growth in developing countries³⁰.

In 2009, the Commission Green Paper on the Reform of the Common Fisheries Policy³¹ - which led to the Common Fisheries Policy reform of 2012 referred to the principles of sustainable and responsible fisheries internationally and the aim of sustainable development of coastal regions. In doing so, it further emphasised the coherence of the Common Fisheries Policy’s external dimension with the EU development and environmental policies. The 2010 Communication on the future of the reform of the Common Agricultural Policy expressly recognised the alignment of the EU agricultural policy with the EU’s international trade and PCD commitments³². The subsequent 2013 EU Common Agricultural Policy reform abolished the systematic use of export subsidies for agricultural products, which had led in the past to international market distortions to the detriment, in particular, of developing countries.

The EU Global Approach to Migration and Mobility³³, revised in 2011-2012, has provided a basis for the implementation of the EU’s 2009 PCD commitments on migration. It places particular emphasis on ensuring strong links and complementarity between the internal and external dimension in EU policies.

5.3 Efficiency and Effectiveness

EQ3: To what extent have PCD inputs and activities been adequate to implement the EU approach to PCD?

The external evaluation concludes that the PCD activities selected for analysis are not fully suitable for implementing the EU approach to PCD.

The Commission has continuously improved its PCD-related policy-making mechanisms and the awareness-raising mechanisms.

Impact assessments

²⁹ “Trade, growth and development – tailoring trade and investment policy for those countries most in need” (COM 2012) 22 and accompanying SWD (SEC 2012) 87.

³⁰ “Trade for All - Towards a more responsible trade and investment policy” (COM2015) 497

³¹ Commission Green Paper on the Reform of the Common Fisheries Policy COM(2009)163

³² The CAP towards 2020: Meeting the food, natural resources and territorial challenges of the future COM(2010) 672

³³ The Global Approach to Migration and Mobility COM(2011) 743

Commission guidance on impact assessments and subsequent revisions have proved to be beneficial for taking into account the impact of EU policies on developing countries.

Notably, in 2009, a provision for assessing potential impacts on developing countries was introduced in the impact assessments guidelines. In 2015, with the rolling out of the Better Regulation guidelines, a detailed methodological guidance on the assessment of impacts “on third countries” was introduced. In 2017, the Commission has further improved these guidelines by replacing the term ‘impact on third countries’ by a more accurate wording ‘impact on developing countries’.

Impact assessments carried out during the preparation phase of the policy-making process provide evidence to inform and support decision-making. An impact assessment is required for Commission initiatives that are likely to have significant economic, social or environmental impacts. The impact assessments work is supported by an inter-service group set up by the Commission service responsible for the relevant initiative and consisting of relevant Commission services and the EEAS, where appropriate. External inputs also feed the analysis, as stakeholders are consulted through a public consultation or targeted consultations and the results are summarised in the impact assessments reports. The independent Regulatory Scrutiny Board, checks the quality of the reports. Stakeholders have further opportunity to comment once the Commission adopts its proposals.

Impact assessments are an important tool to support the promotion of PCD when new policy initiatives are prepared. The impact assessments process has the potential to ensure that impacts on developing countries are taken into account at the early stages of policy-making process.

Over the evaluation period, a limited number of impact assessments actually assessed or mentioned likely impacts on developing countries³⁴. The use of this mechanism can hence still be improved, where such impacts are relevant.

Inter-service consultation

Inter-service consultation is a coordination mechanism of the Commission to ensure internal consultation for general policy-making. Following informal discussions and consultations among Commission services on policy orientation and formulation, the inter-service consultation process consists of structured and recorded exchanges with a clear set of procedural rules providing for relevant departments to be consulted as part of the general policy-making process.

This mechanism enables PCD to be taken into consideration in the general policy-making process. The inclusion of PCD in the work of the inter-service steering group on SDGs in 2017 enabled to identify PCD-related priorities areas to guide the work on PCD across

³⁴ See section on Evaluation question n. 5

Commission services. The analysis, however, finds that in some cases the coordination between Commission services can be improved.

EU biennial PCD reports

The EU's biennial PCD reports provide detailed information on initiatives and actions of PCD relevance taken by the EU and its Member States during the reporting period. The drafting process involves many contributors, mostly from the Commission, the EEAS and Member States. Upon publication, the report is discussed in the Council and in the European Parliament, followed by Council Conclusions and a European Parliament Resolution. As from 2015, Member States' contributions are published together with the report, subject to their consent.

In the absence of pre-defined baselines, indicators and targets against which progress could be measured and reported³⁵, the biennial report cannot be considered as a tool for monitoring progress, but it helps to raise awareness on the EU's approach to PCD and to increase ownership of PCD, as recognised by the 2012 OECD Development Assistance Committee Peer review³⁶.

Reporting by EU delegations

Since 2015, the annual External Assistance Management Report from EU delegations contains a sub-chapter on PCD, which covers:

- observed cases of non-development EU policies affecting the development process in partner countries and
- the quality of dialogues on PCD issues with local stakeholders.

The geographical scope of the reporting was continuously enhanced over the years, strengthening the database and enabling recurrent issues and trends to be identified. The reporting has established itself as a crucial tool for providing regular and systematic information on PCD-relevant issues in partner countries. Its shortcomings are linked to the lack of framework for monitoring PCD progress.

EU Member States informal PCD network

The Commission organises twice a year a meeting with the informal network of Member States' PCD focal points. The network aims at sharing information on national processes and PCD priorities and to alert Member States on important events and issues relevant for PCD at EU level. It also helps identify and disseminate good practices.

This tool is already useful, but greater participation by the PCD focal points could make it even more effective.

³⁵ The need for the EU PCD reports to include reporting on the impacts of the EU's and Member States policies on developing countries was also one of the key findings of the 2018 OECD DAC Peer review EU (s. p. 19f.)

³⁶ 2012 OECD DAC Peer review EU, p. 44.

Screening of the Commission work programme for PCD relevance

Efforts were undertaken to screen the Commission work programme for PCD relevance. This, to facilitate timely and proactive intervention of the Directorate General for International Cooperation and Development with respect to inter-service consultations and impact assessments in relation to policies identified as PCD-relevant. The screening was done in collaboration with various Commission services in the 1 PCD inter-service group. It was expected that Commission services would take greater ownership of commonly identified PCD issues at key stages of the policy-making process. However, as there were no precise guidelines on how to identify policies as PCD-relevant, and as the process had not been formalised, the tool failed to promote ownership of the mechanism itself. The identification, in 2018, of PCD priorities in the context of the inter-service steering group on SDGs, is an important step towards integrating PCD into overall work to implement the 2030 Agenda.

PCD training

The PCD training is important to raise awareness among policy-makers across policy areas on the requirements for an EU approach to PCD and to broaden their knowledge on PCD. The Commission launched a training course on PCD in 2012, with at least one training session per year. The training was aimed at Commission and EEAS staff and was also open to officials from other EU institutions and Member States. In December 2016, in order to expand the training outreach, an e-learning version was developed and made available to external stakeholders³⁷.

The main strengths of the training are that it is part of the Commission's structured official training programme, relies on in-house expertise and widens its outreach thanks to the e-learning tool.

Consultation with developing countries

From 2005 and throughout the evaluation period, the EU recognised that considering developing countries' perspectives is important for the promotion of PCD. In the context of the EU's commitment to supporting achievement of the Millennium Development Goals, the Council invited the Commission inter alia to do more to consult developing countries at the policy formulation stage³⁸. The most explicit legal provision in this respect is Art. 12 of the Cotonou Agreement between the members of the African, Caribbean and Pacific Group of States (ACP) and the European Community and its Member States. The procedure establishes that the EU must inform the ACP Group in advance of the adoption of measures which might affect the interests of the ACP States,

³⁷ The e-learning tool is accessible through this weblink: <https://webgate.ec.europa.eu/devco-academy/course/search.php?search=coherence>

³⁸ See Conclusions of the Council and the Representatives of the Governments of the Member States Meeting within the Council on "Accelerating Progress towards Attaining the Millennium Development Goals: EU Contribution to the Review of the MDGs at the UN 2005 High Level Event", 24.05.2018, para. 20

and that the ACP side, at its own initiative, may request further information, which might lead to formal consultations - again at the request of the ACP states - before any final decision is made.

This consultation tool is not for use in a general EU consultation in its relation with all developing countries as it only applies to its dealings with the ACP states. However, it is an important aspect of the partnership with ACP countries, even though (due to its formal/procedural nature) it cannot be regarded as a proper information tool for gathering “first-hand feedback”. The mechanism was rarely used during the evaluation period³⁹. Other, less formal tools exist that can be used to gather feedback from developing countries. For instance, policy-specific consultations with developing countries can take place during the impact assessment process. However, in practice, developing country stakeholders do not regard these tools as effective consultation mechanisms.

Synergies between activities

Overall, policy-making and awareness-raising mechanisms on PCD are complementing each other. Impact assessments and inter-service consultations would ideally ensure that EU policies take account of impact on developing countries, while awareness-raising mechanisms remind stakeholders of the importance of PCD during the policy-making process. However, it appears that there is need for enhanced complementarity between activities, particularly between the screening of the Commission Work Programme screening for PCD relevance and impact assessments. The inclusion in 2017 of PCD in the work of the inter-service steering group on SDGs fosters synergies between policies and activities throughout the Commission.

EQ4: To what extent has the EU approach to PCD (specific mechanisms to PCD) led to raised awareness on PCD, which in turn has indirectly influenced policy-making?

The external evaluation concludes that the EU’s awareness raising on PCD was limited, despite the activities implemented. In terms of coverage, the main awareness-raising activities implemented during the evaluation period are the biennial PCD reports, meetings with Member States’ PCD network, and PCD training. The external evaluation points to the limited awareness among Commission’s staff of the biennial report content⁴⁰. However, it should be recalled that biennial reports are made public and discussed in the European Parliament and Council. They are also used by civil society organisations and by national parliaments to support domestic dialogue in the Member States. They are therefore considered as an important awareness-raising tool that helps increase ownership of PCD throughout the EU. This has been recognised in several instances, and also by the 2012 OECD Development Assistance Committee Peer Review⁴¹.

³⁹ The only documented use of this mechanism was for February 2009 formal consultation that took place in the context of a meeting of the Joint ACP-EU Subcommittee on Trade Cooperation.

⁴⁰ See External Evaluation Volume I, p. 39.

⁴¹ See 2012 OECD DAC Peer review EU, p. 44.

The meetings of the Member States' PCD network have merit as a tool for sharing information and best practices. As pointed out above, they would be more effective with a greater participation by Member States' PCD focal points. Survey results generally showed positive appreciation of PCD training, including the e-learning tool. At the same time, they revealed that many stakeholders, in particular in EU delegations, were not aware of the availability of such training. It was also highlighted that PCD courses focused heavily on the Directorate General for International cooperation and Development staff with marginal outreach to colleagues in other Commission services. As said previously, the launch of the e-learning module on PCD in 2016 should address the situation.

An important finding of the external evaluation is the need to agree on a common understanding of the PCD concept and commitment among stakeholders, to converge the interpretation and scope of implementation of Art. 208 of the Treaty on the Functioning of the EU. However, the external evaluation also recognises the efforts made with a view to promoting a more collaborative approach within the Commission and with the EEAS, e.g. for the production of the biennial report and of the PCD Screening of the Commission work programme now also part of the inter-service steering group on SDGs.

EQ5: To what extent has the EU approach to PCD influenced existing or planned policies/initiatives likely to affect developing countries so that they take into account development objectives?

The EU approach to PCD had limited influence on existing or planned policies/initiatives likely to affect developing countries so that they took into account development objectives.

This is mainly due to the fact that potential impacts on developing countries were not sufficiently taken into account in impact assessments and in the inter-service consultation process. A thorough analysis of the performance of the Commission's impact assessment tool in this respect has been carried out by the non-governmental organisation "Global Focus" (formerly CONCORD Denmark), which has screened the Commission's impact assessments every year since 2009 to analyse whether these sufficiently assessed potential impacts on developing countries. Of the 530 impact assessments analysed between 2009 and 2015, it deemed 217 relevant for developing countries, out of which it found that 41 (about 20%) included sufficient analysis of impacts on developing countries⁴².

The external evaluators carried out a complementary assessment, using as a sample all policies identified as being PCD-relevant during the evaluation period. It found 41

⁴² As per the methodology defined by Global Focus, the IA analysis of the impacts on developing countries is considered sufficient if (i) the IA mentions possible impacts, positive or negative, of the policy on developing countries; or (ii) all obvious impacts are assessed (s. Global Focus 2016 at: http://www.globalfokus.dk/images/Politik/PCD/IA_analysis_2016_pdf.pdf.)

corresponding impact assessments carried out in 2009-2016, of which 19 (about 50%) included references to likely impacts on developing countries. Of those policies for which the impact assessments did not include any reference, 12 policies could be considered as missed opportunities.

Both analyses suggest that impact assessments do not take sufficient account of likely impacts on developing countries. There is also no evidence of improvement over time, as the impact assessments that did not explicitly mention potential impacts on developing countries are distributed evenly across the evaluation period. This highlighted the potential for further improvements as subsequently introduced with the revisions of impact assessments guidelines in 2009, 2015, and 2017 (see above).

The qualitative assessment of impact assessments for the 13 policies selected for stage 2 of the external evaluation⁴³ gives the following picture:

- three impact assessments are of high-quality and are extensive;
- one impact assessment addresses the potential impacts of selected options but is probably not as detailed as it could have been;
- two impact assessments have limited coverage of impacts on developing countries;
- three impact assessments do not assess the impact on developing countries in a satisfactory manner;
- four policies had no impact assessments but supporting documents which deal to some extent with impacts on developing countries.

This high degree of heterogeneity in terms of coverage, methodology, and extent of the impact assessments for the 13 selected policies suggests that impact assessments guidelines over the evaluation period were not sufficiently explicit as to when to assess impacts on developing countries. On the other hand, it is also indicative of inherent challenges of impact assessments: it is often very difficult to establish a causal link between internal EU policies and their impact on developing countries, which makes the impact assessments exercise very challenging technically and methodologically.

Another key finding in this context is the high degree of correlation between the quality of the impact assessments (i.e. the extent to which the impact assessment considers the likely impact of the policy on developing countries) and the actual inclusion of development considerations in the design of a policy. This confirms the importance of the impact assessments as a PCD mechanism.

⁴³ See above Table 2

5.4 EU Added Value

EQ6: To what extent has the EU approach to PCD created additional value beyond what could be achieved by EU Member States acting independently?

In line with the commitment of Art. 208 of the Treaty on the Functioning of the EU, the promotion of PCD was recognised as a shared responsibility of the EU and its Member States in the 2005 European Consensus on Development. This joint commitment to PCD was strengthened in the new European Consensus on Development of 2017, which identifies PCD as a crucial element of the EU's and Member States' strategy to achieve the SDGs, requiring a partnership approach with all stakeholders at all levels, i.e. nationally, within the EU, in other countries and at global level. The 2012 OECD DAC Peer Review acknowledged the instrumental nature of the EU and its Members States in putting forward key global issues, such as PCD⁴⁴.

The external evaluation recognises that the EU has played a critical role on PCD, both in establishing a common base for PCD and in promoting it. In addition, it points out that several key policy areas of highest relevance for PCD, such as trade, fisheries, agriculture, and migration, are better pursued with the EU approach on PCD.

Available evidence also confirmed the influence of the EU's approach to PCD in Member States' adoption of PCD mechanisms. Nine of the ten respondents to the Member States survey⁴⁵ acknowledged that the EU's approach to PCD has contributed, at least partially, to reinforcing their own PCD commitment, and one stated that it used the EU's approach to PCD as a basis for its own PCD policy.

PCD mechanisms likely to foster exchanges and coordination between the Commission and Member States include the Member States informal PCD network, the preparation of and follow-up to the PCD biennial reports, and the PCD Work Programme 2010-2013.

The external evaluation also highlighted the role of the informal PCD network as a forum allowing Member States and the Commission to regularly exchange information, make their work on PCD more visible and thus increase awareness on PCD. The preparation and publication of the PCD biennial report, to which EU Member States regularly contribute in high numbers⁴⁶, raises awareness on the progress made by Member States on PCD, generates public debate on PCD and peer pressure among Members States, and contributes to increase ownership on PCD within the EU. The 2012 OECD DAC Peer Review commended that PCD Work Programme 2010-2013 served a common vision for the EU, the Member States and the Community for the building of PCD⁴⁷.

⁴⁴ See 2012 OECD DAC Peer review EU, p. 28.

⁴⁵ See Annex 2

⁴⁶ The number of EU Member States contributing each time to the biennial Reports ranges from 21 to 28.

⁴⁷ See 2012 OECD DAC Peer Review EU, p. 46.

5.5 Impact

EQ7: To what extent have changes in the design and implementation of EU policies and initiatives brought about by incorporating an approach to PCD influenced outcomes and impacts in developing countries?

The external evaluation selected from the initial sample of 13 policies four specific policies to assess their outcomes and impacts in developing countries. For each of the four policies, two countries were chosen as case studies⁴⁸. All four feature development considerations or specific development-related provisions and can therefore be said to have incorporated an approach to PCD during the policy formulation process and thus to reflect best practices with respect to PCD.

The main findings of the eight country case studies can be summarised as follows:

Extent to which the Common Fisheries Policy (2013 reform) has had positive development outcomes and impacts in Mauritania and Senegal

The sustainable fisheries partnership agreements (SFPAs) with Mauritania and Senegal have evolved over time through their successive protocols to take greater account of the interests of Senegal and Mauritania and their fisheries sectors, and to ensure the sustainable exploitation of resources. In particular, the conditions in recent protocols (on authorised species and fishing areas) appear to have been effective in mitigating potential negative impacts on the economic development of the fisheries sector in both countries. In terms of the SFPAs' contribution to positive development outcomes and impacts, the assessment is more nuanced:

- The SFPAs' most evident impact in Mauritania and Senegal is their contribution to improving fisheries governance. They provide a transparent framework for EU vessels' activities in the waters of Mauritania and Senegal and contributes to regular monitoring of the state of fish stocks;
- While the SFPAs have contributed to the local economy and to employment in both Mauritania and Senegal, these impacts have been relatively limited;
- The sectoral support components - which are considered as a key tool for achieving the SFPAs' development objectives - appear to have had positive effects. However, due to the absence of indicators, their exact impact is difficult to measure;
- Ensuring PCD remains a challenging exercise, often linked to the very different processes underlying the design of SFPAs (which are the result of a commercial negotiation) and development cooperation policy, and the different procedures used, e.g. concerning the application of budget support.

⁴⁸ See final selection of policies and countries in Table 3 above.

Extent to which the Generalised Scheme of Preferences (GSP) has contributed to poverty eradication by expanding exports from Vietnam and Mozambique to the EU

The GSP's overall performance in terms of outcome achievement – measured by its effect on exports, output and investment – is considered as mixed for Mozambique and Vietnam.

In the case of Vietnam, the preference regime has had a positive impact on exports to the EU, aided by the simplification of rules of origin, at least for some sectors. However, sectors not covered by the GSP have been more important for Vietnam's economic growth and development than the GSP sectors. In the case of Mozambique, the effect of the GSP on exports was limited. Despite the preferences accorded under the GSP's 'everything but arms' arrangements exports to the EU have performed less well than overall Mozambique's total exports. The reasons for this are varied, but mostly relate to limited productive capacities, which do not seem to be adequately addressed through complementary developmental support by the EU.

In terms of impacts (e.g. on employment), the GSP's contribution appears to be relatively limited in both countries. Employment in Vietnam has grown strongly, and it is highly probable that the GSP partly contributed. On the other hand, growth now comes from more sophisticated goods (mostly electronics), on which the EU does not apply tariffs. In Mozambique, EU preference regimes have made a considerable contribution to job creation in the sectors where they impacted exports.

Extent to which the EU Action Plan (EUAP) on Wildlife Trafficking is likely to contribute to development objectives by benefiting local communities in Burkina Faso and Kenya engaging them in wildlife conservation

Most relevant EU actions in Kenya and Burkina Faso can be indirectly linked to the EUAP on Wildlife Trafficking. In addition, these actions are often implemented in the context of traditional development cooperation, without any concrete involvement of Commission services; the "PCD" content of the EUAP, therefore, does not appear to be prominent.

Extent to which the Global Approach to Migration and Mobility (GAMM) has contributed to poverty reduction by facilitating the legal migration of non – EU country residents to the EU and promoting social and economic development in Cape Verde and Armenia

The GAMM's approach to PCD is clearly reflected in the migration and development pillar of the policy, and specific actions have been included in each mobility partnership with respect to migration and development⁴⁹. Actions implemented under the migration and development pillar of the mobility partnership with Cape Verde and Armenia have

⁴⁹ The GAMM case studies focus on the MPs as they constitute one of the main tools for implementing the GAMM with respect to partner countries.

been positive but rather limited in terms of number, scope, size of budget allocation and continuity as compared with the other pillars of mobility partnerships (legal migration, border management and irregular migration, international protection and asylum)⁵⁰.

Therefore, in terms of impact, the contribution of the migration and development pillar appears quite limited. Mobility partnerships have not guided a comprehensive approach to migration and development for the countries concerned. Their fragmented nature, in view of the variety of stakeholders involved and uneven levels of commitment, requires effective programming in the implementation phase.

On the basis of the case studies, the external evaluation concludes that the changes in the design and implementation of the four specific policies, as a result of incorporating an approach to PCD, have influenced outcomes and impacts in the eight selected developing countries in a limited way.

It is important to stress that the findings summarised here pertain specifically to the countries that were selected for the case studies and, in most cases, cannot be generalised. The impact of a policy on developing countries may vary greatly across countries, not only because developing countries are a heterogeneous group, but also because the exact causal links underlying the effects of the policy are often country-specific. As a result, the findings presented here provide only a partial snapshot of the impact of selected policies in developing countries.

5.6 Sustainability

EQ8: To what extent is the EU approach to PCD sustainable?

Since 2009, the Council has reaffirmed in Conclusions on various policies its commitment to the promotion of PCD and to enhancing the links between development and migration, trade, environment, climate change, agriculture, and conflict and crisis situations. The Commission has reaffirmed at the highest level its political will to continue working on PCD-related issues⁵¹. The new European Consensus on Development confirms that PCD is an essential element of the EU's response to the sustainable development challenge referred to in the EU Treaties. It also confirms the EU political commitment to implement the 2030 Agenda.

⁵⁰ Regarding the actions undertaken under the M&D pillars of each MP, these have remained limited to pilot projects, in some cases dating back to the beginning of the implementation period of the MPs with each country.

⁵¹ For instance, in the 2014 Mission Letter of Commission President Juncker addressed to the Commissioner on Development the former requested that he worked closely with the Commissioners responsible for other cross-cutting policies and, in particular for Migration and Home Affairs; Employment, Social Affairs, Skills and Labour Mobility; Agriculture and Rural Development; Climate Action and Energy; and Environment, Maritime Affairs and Fisheries, to help ensure that EU policies are consistent with and support the development goals. Also, upon the release of the 2015 PCD Biennial Report, the Commissioner on Development expressed his commitment towards PCD as a “personal commitment” and reiterated the role of PCD for the 2030 Agenda.

However, the external evaluation observed that the EU's positive lead role in the promotion of PCD could be compromised in the future, unless there is a clear and comprehensive definition of its approach to PCD in the wider context of SDG implementation and its relation to policy coherence for sustainable development. Also, while welcoming the establishment of the inter-service steering group on SDGs in the Commission, the 2018 OECD DAC Peer Review pointed to the need for a gap analysis to identify PCD priority issues and a more robust accountability mechanism in view of SDGs implementation⁵².

Evidence suggests that certain changes during the evaluation period have affected PCD sustainability (i.e. inter-service group, screening of the Commission Work Programme) but also the lack of a strategic framework for implementation.

As the field cases have shown, evidence on impact is limited due to the absence of effective monitoring and evaluation mechanisms to date. Projects are ongoing to develop possible relevant indicators for PCD: with the UN (UN Environment's work on indicators for SDG 17.14.1), with the OECD (work on tracking progress on policy coherence for sustainable development and measuring transboundary policy impacts) and with a Horizon 2020 project (project "Sustainable Market Actors for Responsible Trade" on the elaboration of guidelines for PCD impact assessment to support the set-up of a tool for measuring progress on PCD).

Ultimately, as evidence on the use of impact assessments and the selected policies analysed suggests, maintaining sustainability of the approach to PCD requires continuous attention, and learning, and readiness to adapt.

⁵² See 2018 OECD DAC Peer Review EU, p.33.

6. CONCLUSIONS

The main findings and conclusions of the evaluation are:

- a) The EU has exercised a leading role on PCD in the international context by prioritizing it as a means to implement its international commitments on development. The Commission has acted as a lead institution in the implementation and promotion of PCD and, to this end, has continuously improved its policy-making and awareness-raising mechanisms to better integrate PCD;
- b) The EU and its Member States have reaffirmed their political will to promote PCD in the new European Consensus on Development. Their common position reinforces the sustainability of PCD and confirms the EU added value;
- c) It would be useful to further clarify the understanding and operational implication of the EU's approach to PCD to enhance the analysis of potential impacts of EU policies on developing countries;
- d) The EU has adapted its approach to PCD to the new policy framework, by integrating PCD into the overall Commission work on the implementation of the 2030 Agenda;
- e) Impact Assessments are crucial for assessing possible impacts of EU policies on developing countries. Efforts to systematically consider these impacts could be further strengthened.
- f) Measuring the impact of PCD remains very challenging as long as there are no baselines and targets to measure PCD and that EU delegations do not play a more prominent role in monitoring the impact of PCD. Projects are ongoing with the UN, the OECD and within a Horizon 2020 project to define relevant indicators.

ANNEX 1: METHODOLOGY AND PROCEDURAL INFORMATION

1. PLANNING AND KEY METHODOLOGICAL STEPS

The external evaluation of the EU's PCD (covering the period 2009-2016) was planned in the 2015 Evaluation Work Programme, as approved by the Commissioner for International Cooperation and Development, in agreement with the High Representative/Vice-President for Foreign Affairs and Security Policy, the Commissioners for European Neighbourhood Policy and Enlargement Negotiations, and for Humanitarian Aid and Crisis Management. The objective of the external evaluation was to provide relevant stakeholders with an overall and independent assessment of PCD actions to improve the impact of relevant EU policies.

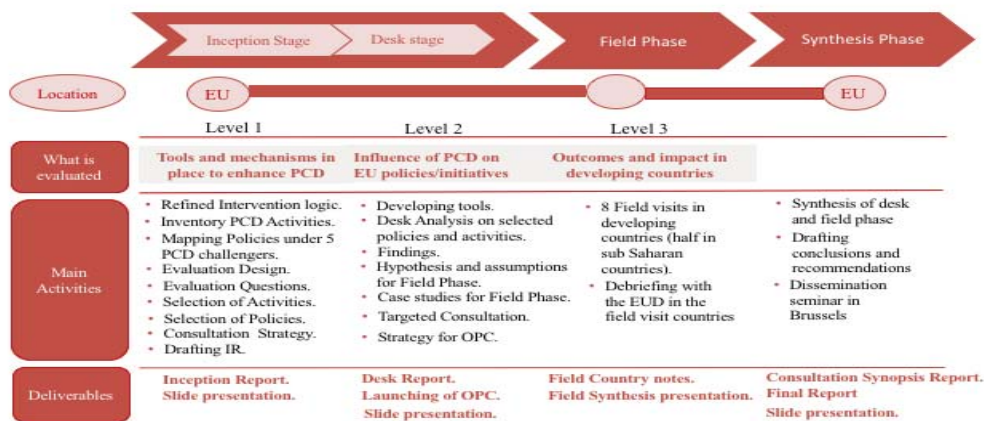
This Commission staff working document summarises and presents the external evaluation findings and conclusion, and provides information that is more recent for a comprehensive and up to date overview.

The external evaluation and this staff working document followed the principles set out in the Better Regulation Guidelines.

A roadmap was published in April 2016, and a Request for Services was launched in July 2016. The start date of the activities according to the signed contract was the 12 September 2016.

A designated inter-service group was set up in November 2015 comprising both the Commission services concerned⁵³ and the EEAS. All members of the inter-service group were consulted throughout the evaluation process. The inter-service group met six times between June 2016 and April 2018. Its meetings took place in line with the phases of the evaluation methodology, as shown below:

⁵³ SEC GEN, AGRI, CLIMA, CNECT, COMP, EAC, ECFIN, ECHO, EMPL, ENER, ENV, ESTAT, FISMA, GROW, HOME, JRC, JUST, MARE, MOVE, NEAR, RTD, SANTE, TAXUD & TRADE



The evaluation phases included an inception stage to reconstruct the intervention logic, a desk stage, where all available information was collected – including targeted and open public consultations -, definition of the hypothesis to be tested during the field phase and of the case studies. At the end of the process all information collected was merged along the lines of clear judgement criteria. At each stage and phase of this process, the inter-service group commented the reports, which were subject to formal approval by the Commission.

The inter-service group was also consulted on this draft staff working document on 4 December 2018.

Methodological references are provided throughout the document to substantiate evidence.

2. EVIDENCE, SOURCES AND QUALITY

The external evaluation used reliable data. A more than adequate synthesis of primary and secondary data was selected and used. Stakeholders were consulted on their involvement and expertise on PCD and/or invited to submit their comments and additional information on the main preliminary findings relating to the Evaluation Questions and links to the criteria of Relevance, Coherence, Efficiency, Effectiveness, EU Added-Value, Impact, and Sustainability.

The consultation process involved:

- targeted consultations, including interviews with relevant stakeholders and three online surveys:

- interviews were carried out with Commission, EEAS and European Parliament staff and external stakeholders (*inter alia* OECD, civil society organisations, ACP Secretariat);
- online surveys targeting:
 - Commission and EEAS staff (“Commission and EEAS survey”);

- staff in EU delegations (“EU delegations survey”);
- PCD focal points in Member States (“EU Member States survey”);

- 14-weeks online open public consultation (from 20 February to 31 May 2018):

The consultation synthesis report is enclosed in this staff working document (Annex 2).

Field missions were undertaken in the following eight countries: Mozambique, Vietnam, Armenia, Senegal, Burkina Faso, Kenya, Cape Verde and Mauritania. The field phase purpose was to assess the outcomes and – where possible - impacts for four selected case studies.

The external evaluation made a solid analysis of the data according to the state-of-the-art. An evaluation matrix was provided, including the rating of evidence. All limitations are mentioned, and all sources are systematically cited and annexed to the external evaluation. Concrete quality rules and criteria were applied throughout the evaluation process, including for the approval of deliverables and the quality of reports.

The role of the inter-service group on the quality assurance of the evidence and on the deliverables of the external evaluation was crucial.

This staff working document, associated to the external evaluation, follows the Better Regulation guidelines and describes the Commission analysis and conclusion to the evaluation. The Commission considers that the external evaluation was conducted in a sound manner. However, given the period covered by the evaluation, more recent relevant information has been included in this staff working document, for a comprehensive and up to date overview. This provides insight to Commission position with regard the external evaluation.

4 EXCEPTIONS TO THE BETTER REGULATION GUIDELINES

There were no exceptions to the Better Regulation guidelines.

ANNEX 2: SYNOPSIS REPORT OF THE STAKEHOLDERS CONSULTATION

1. Introduction

The overall purpose of the consultation carried out as part of the external evaluation of the EU's PCD was to ensure that all relevant stakeholders are given the opportunity to express their views on elements of the external evaluation, as well as to gather evidence which would be used to inform possible policy-making.

More specifically, stakeholders have been consulted on their involvement and expertise on PCD and/or invited to express their comments and additional information on the main issues related to the Evaluation Questions (EQs) regarding the criteria of Relevance, Coherence, Efficiency, Effectiveness, EU Added-Value, Impact and Sustainability.

2. The consultation process

The consultation process involved i) a targeted consultation (including interviews with relevant stakeholders and three online surveys) and ii) an open public consultation.

Interviews were carried out with various staff at the Commission and EEAS services, the European Parliament, and external stakeholders (OECD, civil society organisations, ACP Secretariat, among others).

Three targeted online surveys were conducted as follows:

- One survey targeted at staff in Commission services and in the EEAS (“Commission and EEAS survey”);
- One survey targeted at staff in EU delegations (“EU delegations survey”);
- One survey targeted at relevant PCD focal points in the 28 EU Member States (“EU Member States survey”);

The 14-weeks online open public consultation was undertaken from 20 February to 31 May 2018.

A total of 86 responses were received as part of the three targeted online surveys and the open public consultation, split as follows:

- Open public consultation: a total of 31 contributions were received as part of the open public consultation. Contributions were received from individuals both in the EU and outside the EU, as well as from specific organisations/stakeholders (e.g. civil society organisations, public national authorities, etc.).
- Commission and EEAS survey: a total of 90 staff in Commission services and in the EEAS were invited to participate in the survey and a total of 24 responses

were received. Respondents included staff from 13 different Commission services, the Secretariat-General and the EEAS.

- EU delegations survey: a total of 67 EU delegations based in developing countries were invited to participate in the survey and a total of 21 responses were received.
- EU Member States survey: all 28 EU Member States were invited to participate in the survey and a total of 10 responses were received.

3. Main findings

3.1. Relevance

➤ The Relevance of the EU PCD approach

Question: Do you consider that the way in which PCD has been implemented in the EU has been/is relevant?

The open public consultation included a specific question on the relevance of the EU approach to PCD and only a narrow majority of respondents considered that the way in which PCD has been implemented in the EU has been or is relevant (41,4%).

However, the analysis of specific comments provided by respondents shows that the respondents that answered negatively to the question did not so much question the relevance of the EU approach to PCD but rather its effectiveness, or in many cases simply the effectiveness of development aid in general.

With respect to respondents that considered that the way in which PCD has been implemented in the EU has been/is relevant, several of them described PCD as one of the pillars of EU action towards developing countries and in this respect recalled that it is enshrined in Art. 208 of the Treaty on the Functioning of the EU. Furthermore, respondents mentioned several factors that highlight the relevance of the EU approach to PCD.

The relevance of the EU approach to PCD in the context of the post-2015 framework was also addressed by respondents. Respondents considered that the SDGs provide a comprehensive, overarching framework for achieving policy coherence for sustainable development both within EU Member States and partner countries, and several respondents specifically welcomed the move from PCD to policy coherence for sustainable development), in the sense that they see the need for the EU to identify possibilities to contribute via other policies to sustainable development in general, and in developing countries more specifically.

➤ **Need for purpose built PCD mechanisms at the EU level**

Question: To what extent does the EU's approach to PCD need PCD specific-mechanisms to be implemented?

Survey results suggest mixed views from stakeholders as to whether the EU's approach to PCD needs PCD-specific mechanisms to be implemented. The responses to the question were generally split between "partially" and "substantially", with respondents to the Commission and EEAS survey tending towards "partially".

Several stakeholders made the point that:

- On the one hand, PCD-specific mechanisms are relevant to raise awareness on PCD, focus and communicate about PCD research, and would be needed for data collection (e.g. development of specific indicators/scoring mechanism for coherence with a quality and common (agreed) methodology);
- On the other hand, in operational terms, the existing non-PCD specific mechanisms such as the impact assessments and inter-service consultation may be sufficient for inter-service or for coordination purposes and PCD considerations could well be mainstreamed across the general Commission instruments.

➤ **Adaptation of organisational structures and/or the functioning of PCD mechanisms during the period 2009-2016**

Question: To what extent have organisational structures and/or the functioning of PCD mechanisms been adapted to new needs and/or demands of various stakeholders (i.e. civil society organisations, EU Member States, developing countries) during the period 2009-2016?

Survey results suggest that stakeholders are not fully convinced that organisational structures and/or the functioning of PCD mechanisms have adapted well to new needs and/or demands of the various stakeholders during the evaluation period. The majority of stakeholders answered "partially".

At the same time, the question proved difficult to answer for many stakeholders: a high number of respondents indicated that they do not have an opinion on the subject (more than 60% of respondents to the Commission and EEAS Survey and 30% of the respondents to the EU Member States Survey).

When asked to list what in their view were the most relevant changes over the 2009-2016 period, stakeholders offered a wide variety of responses, mentioning, inter alia: the revision of impact assessment guidelines in 2009 and 2015 and the development and introduction in 2015 of a specific tool to guide the assessment of policy initiatives' impacts on developing countries; the development of PCD training tools and adaptation of the training to EU delegations (development of an e-learning module in 2016); or the

introduction in 2014 of regular reporting on PCD by EU delegations (through the inclusion of two specific questions on PCD in the External Assistance Management Report).

However, some negative changes occurring during the period were also mentioned by stakeholders, such as the fact that the PCD biennial Report was downgraded from a Commission communication to a staff working document and has been put on hold due to the changing context introduced by the 2030 Agenda and the new European Consensus on Development (for this reason, no PCD biennial Report was published between 2015 and 2019).

Question: Has [the way in which PCD has been implemented in the EU] responded well to i) the evolving (past and current) needs of developing countries; (ii) institutional changes at the Commission level and the EEAS; and (iii) EU's development objectives?

The open public consultation also included specific questions on the implementation of PCD in the EU as a response to the evolving needs of developing countries, the institutional changes at the Commission level and the EEAS and to the EU's development objectives.

The majority of respondents to the open public consultation considered that the EU approach to PCD and its mechanisms have not responded well to the evolving needs of developing countries (72,4%). When asked to explain why they doubted that the EU's approach to PCD has responded well to the evolving needs of developing countries, a variety of factors were mentioned by respondents. Several respondents indicated for example that they fail to see how the principle of PCD has been taken into account when the EU delegations drafted the National Indicative Programmes for the period 2014-2020.

Opinions were relatively split on the subject, but a majority of the respondents (37.9%) that expressed an opinion on the subject considered that the way in which PCD has been implemented in the EU has not responded well to institutional changes at the Commission level and the EEAS.

Some respondents argued that the institutional changes have brought a solid coherence between various EU policies (such as development, external action, trade, migration and agriculture, etc.) but have not led to increased PCD in the sense of development objectives being taken more into account in non-development policies, as enshrined in Art. 208 of the Lisbon Treaty. In this relation, some respondents commented that the EU's Global Strategy on Foreign and Security Policy even seems to subordinate development objectives and noted that it makes no reference whatsoever to PCD.

A majority of respondents to the open public consultation (44.8%) considered that the way in which PCD has been implemented in the EU has not responded well to EU's

development objectives. However, a significant number of respondents might have answered negatively to the question because they considered that EU's development policy is not achieving its objectives, since their comments appear to focus on the impact of development aid and were not referring to PCD.

With respect to the respondents that answered negatively and were clearly referring to the EU approach to PCD or PCD issues, most explained their position by highlighting that in practice only a limited number of EU policies (or policy proposals) take into account EU's development objectives and/or the likely impacts of the policy in developing countries.

3.2. Coherence

➤ EU's approach to PCD as a priority within wider EU policy

Question: To what extent has the EU's approach to PCD been reflected as a priority within the wider EU policy making of your Commission service during the period 2009-2016?

The majority of respondents to the Commission and EEAS Survey consider that, within their own service, PCD has only been reflected partially as a priority (50%). 20% of the respondents did not have an opinion about this question.

The analysis of individual responses suggests however that the level of priority given to PCD might vary greatly depending on the Commission service. The feedback from stakeholders also suggested that one factor explaining why the approach to PCD has not been a priority in certain Commission services has been the lack of awareness on PCD. In terms of evolution during the 2009-2016 period, some stakeholders argued that the level of importance or priority of PCD has decreased during this period, citing as reasons various factors such as the lack of political support and commitment, the lack of interest in the topic, as well as the lack of engagement on PCD issues.

➤ Coherence of the EU approach to PCD with wider EU policy and evolving international obligations of the EU

Question: In your opinion, is the way in which PCD has been implemented in the EU coherent with wider EU policy and evolving international obligations of the EU?

Opinions were split among respondents to the open public consultation as to whether the EU's approach to PCD has been coherent with wider EU policy and evolving international obligations of the EU, with a narrow majority of respondent answering negatively (46.4%).

Several respondents considered that the EU approach to PCD is in line with the 2030 Agenda adopted worldwide in 2015. At the same time, many respondents highlighted examples, which in their view show a lack of coherence between, on the one hand, the EU approach to PCD and the way in which it has been implemented, and on the other hand, EU wider policy or evolving international obligations of the EU. For instance, some respondents noted that the EU's Global Strategy adopted in 2016 outlines a number of priorities for the EU and mentions only once in passing the commitment to PCD: this contrasts with dozens of mentions of migration, terrorism or growth (all more self-centred policy priorities) and might suggest that the EU's PCD efforts, while consistent with the letter of the EU's Global Strategy, are not strongly aligned with its order of priorities.

Furthermore, several respondents questioned whether the way in which PCD has been implemented in the EU remains coherent in the framework of the 2030 Agenda, as the five PCD challenges have not been updated since the adoption of the 2030 Agenda. In general, several respondents called for an EU-wide debate on PCD in the framework of the 2030 Agenda and that PCD should be included as a core issue in the upcoming EU policy debates on the new Global Strategy and the Multi-Annual Financial Framework.

3.3. Efficiency

- **Level of human resources (staffing and expertise) available to implement the EU's approach to PCD**

Question: Is the actual level of human resources (staffing and expertise) available to implement the EU's PCD commitment within the Commission services and EEAS sufficient?

Survey results suggest that most stakeholders consider the level of human resources (staffing and expertise) available sufficient to implement the EU's PCD commitment (35% the respondents to the Commission and EEAS Survey and 10% of the respondents for the EU Member States Survey). At the same time, a high number of respondents indicated that they do not have an opinion on the subject (45% of the respondents to the Commission and EEAS Survey and 70% of the respondents for the EU Member States Survey).

Several stakeholders argued that it was not a question of staffing (or of expertise among staff working on PCD directly), but rather of insufficient leverage of the available staff and expertise. Some respondents made the point that the central challenge was raising awareness beyond development practitioners (i.e. improving understanding of PCD across the Commission and the EEAS and increasing expertise among staff.

- **Redundancies/synergies between organisational structures**

Question: Are there redundancies/synergies between organisational structures of various Commission services with respect to the implementation of the EU's commitment to PCD?

Survey results suggest that most stakeholders consider that there are no redundancies between organisational structures of various Commission services with respect to the implementation of the EU's commitment to PCD (45% of the respondents to the Commission and EEAS Survey, 40% of the respondents to the EU Member States Survey and 25% of the respondents to the EU delegations Survey). At the same time, a sizable share of respondents indicated that they do not have an opinion on the subject (more than half of respondents).

Survey results suggest that the vast majority of stakeholders consider that there are synergies between organisational structures of various Commission services with respect to the implementation of the EU's commitment to PCD. However, a high number of respondents indicated that they do not have an opinion on the subject (more than two thirds of the respondents to the Commission and EEAS Survey and more than half of the respondents of the EU Member States and EU delegations Surveys).

Overall, the feedback from stakeholders suggests that the stronger synergies were found in the area of trade and development.

➤ **Knowledge/awareness of the modus operandi of PCD mechanisms**

Question: Is the level of knowledge/awareness of the modus operandi of PCD mechanisms in your Commission service and staff, and by the EEAS sufficient?

A majority of respondents to the Commission and EEAS survey considered the level of knowledge/awareness of the modus operandi of PCD mechanisms as "sufficient" (52.6%), but there was still a sizable share of respondents that did not share this view (21.1% answered "not sufficient"). The mixed feedback appears to reflect the lack of a common view on what should be the optimal level of knowledge/awareness within EU institutions.

With respect to the EU delegations Survey, it can be noted that a majority of respondents considered the level of knowledge/awareness of the modus operandi of PCD mechanisms as "barely sufficient" (38.1%) or "insufficient" (33.3%): several respondents highlighted a general lack of awareness at EU delegation level about PCD and the way it is implemented, and therefore called for more awareness raising and training on the subject.

➤ **Cooperation and coordination between EU institutions and with non-EU institutions**

Question: To what extent do (EU) PCD mechanisms enhance effective cooperation and coordination between: 1. EU Member States, EP, Council, and EEAS?, 2. The EU and other EU stakeholders (CSOs, European Economic and Social Committee)?, 3. The EU and developing countries?

The results of the Commission and EEAS Survey and the EU Member States Survey show that most stakeholders consider that EU PCD mechanisms contributes, at least to some extent, to enhancing coordination (i) between EU Member States, EP, Council, and EEAS, (ii) between the EU and other EU stakeholders (civil society organisations, European Economic and Social Committee), and (iii) between the EU and developing countries. A variety of views was expressed by respondents and the most frequent answer for all sub-questions was “partially”. The sub-question for which the most “none” answers were recorded was the one on whether the EU PCD mechanisms enhance cooperation and coordination between the EU and developing countries.

Question: To what extent does the PCD commitment (i.e. taking into account the objectives of development cooperation in policies which are likely to affect developing countries, as per Art. 208 of the TFEU) enhance effective cooperation and coordination between: 1. EU Member States and EEAS?, 2. The EU and developing countries?

With respect to the EU delegations Survey, the results suggest that most stakeholders in EU delegations consider that the PCD commitment contributes to enhancing coordination between EU Member States and EEAS as well as between the EU and developing countries, but only to some extent. The most frequent answer to the questions was “partially”.

3.4. Efficiency / Effectiveness (PCD Mechanisms)

➤ PCD biennial Report

Question: To what extent is the EU biennial Report on PCD: 1. Suitable for the purpose of monitoring PCD progress?, 2. Effective in influencing policy-making in order to take account of development objectives in new policies and initiatives?, 3. Effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD?

Survey results suggest that stakeholders generally consider that the PCD biennial Report is, at least to some extent, a suitable tool for monitoring PCD progress. The responses to the first question above were generally split between “partially” or “substantially”.

Stakeholders however appeared to be slightly less convinced of the effectiveness of the EU PCD biennial Report in terms of influencing policy-making and changing behaviour and practice, as the most frequent answer of respondents to the second and third questions above was “partially”.

Suggestions for the PCD biennial Report to be more effective in the future, according to the respondents:

- The report could change from being a mostly descriptive exercise to becoming a more analytical tool. However, as noted by the respondent this would presuppose the existence of a PCD strategy or action plan against which progress could be measured/tracked.
- The report could be prepared by external independent experts.
- The report could be used for outreach in a larger extent for raising awareness and to initiate debate.
- Finally, one respondent noted that future reports should consider a move to policy coherence for sustainable development, which would reflect the reality of policy making in Commission services.

➤ **EU delegations Reporting**

Question: To what extent is reporting by EU delegations on PCD issues (including EAMR) suitable for the purpose of monitoring PCD progress?

Survey results suggest that stakeholders agree that reporting by EU delegations is suitable, at least to some extent, for the purpose of monitoring progress. Most respondents answered the question with either “partially” (31.6%) or “substantially” (31.6%); no respondent selected “none” as an answer.

The results of the EU delegations Survey suggest however that stakeholders are slightly less convinced of the effectiveness of the EU delegations reporting in terms of influencing policy-making and changing behaviour and practice. The most frequent answer of respondents to the sub-questions on whether the reporting by EU delegations is “effective in influencing policy-making in order to take account of development objectives in new policies and initiatives” and “effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD” was “partially”.

➤ **PCD training activities**

Questions: To what extent are (the EU's) PCD training activities: 1. Suitable for the purpose of increasing PCD awareness? 2. Effective in influencing EU's policy-making in order to take account of development objectives in new policies and

initiatives? 3. Effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD?

Survey results suggest that most stakeholders generally agree that PCD training activities are suitable for the purpose of increasing PCD awareness, but opinions appear to be relatively split as to whether PCD training activities are effective in influencing EU's policy making and in changing behaviour and practice. However, a high share of respondents stated that they do not have an opinion on these subjects, in particular when it comes to respondents to the EU delegations Survey.

Several stakeholders made the point that staff outside the Directorate-General for International Cooperation and Development should be more involved in PCD trainings, in particular colleagues in other Commission services in charge of drafting EU legislative proposals. The lack of coverage of PCD training activities at the level of EU delegations was also the subject of many comments. With respect to the e-learning course, stakeholders familiar with the tool appear to show a positive appreciation, with several respondents describing it as very useful.

➤ Impact assessments

Question: To what extent are impact assessments: 1. Suitable for the purpose of adequately taking into account development objectives in non-development EU policies? 2. Effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD?

Survey results suggest that stakeholders consider the impact assessment instrument as a suitable PCD mechanism but are slightly less convinced of its effectiveness in terms of influencing policy-making and changing behaviour and practice. The most frequent answer of respondents to the first question was “substantially”, while the most frequent answer of respondents to the second question was “partially”.

➤ Inter-service consultation

Question: To what extent is inter-service consultation: 1. Suitable for the purpose of adequately taking into account development objectives in non-development EU policies? 2. Effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD?

Survey results suggest that stakeholders consider that inter-service consultation is, at least to some extent, a suitable tool for the purpose of adequately taking into account development objectives in non-development EU policies. However, stakeholders appear to be slightly less convinced of its effectiveness in terms of influencing policy-making and changing behaviour and practice.

Stakeholders appeared to consider that inter-service consultations are generally a useful opportunity to promote PCD but at the same time some noted that the inter-service consultation often comes too late in the policy formulation process, while others pointed out that ultimately the final drafts of the documents are agreed at Cabinet level depending on political priorities, thereby limiting to some extent the effectiveness of inter-service consultations as a PCD mechanism.

➤ **Commission Work Programme screenings**

Question: To what extent are Commission Work Programme screenings: 1. Suitable for the purpose of adequately taking into account development objectives in non-development EU policies? 2. Effective in changing behaviour and practice within Commission services regarding the EU's approach to PCD?

Survey results suggest that there is a variety of views as to whether Commission Work Programme screenings are a suitable and effective PCD mechanism, but it appears that most stakeholders consider its suitability and effectiveness as limited: no respondent selected “fully” as an answer to any of the two sub-questions, while a sizable share of respondents selected “none” as an answer.

➤ **Dialogues with developing country partners**

Question: To your knowledge, to what extent have PCD issues been included in dialogues with developing country partners (i.e. consultation under Art. 12 of Cotonou Agreement revised in 2010; political dialogues with partner countries; structured dialogues with partner countries)?

Results of the Commission and EEAS Survey and of the EU Member States Survey suggest that most stakeholders consider that PCD issues have not much been included in dialogues with developing country partners. The majority of stakeholders answered “partially”.

The EU delegations Survey also included specific questions on the suitability and effectiveness of consultations with developing country partners. Survey results suggest that if stakeholders in EU delegations appear to consider that consultations with developing country partners are suitable for the purpose of increasing knowledge on the EU's commitments to PCD (“substantially” is the most frequent answer to the first question, and no respondent selected “none”), they are however slightly less convinced that these consultations can be effective in (i) influencing EU's policy-making in order to take account of development objectives in new policies and initiatives or (ii) changing behaviour and practice within Commission services regarding the EU's approach to PCD.

Respondents noted however that PCD as such is rarely a topic in the consultations: while it is true that consultations may be used to increase knowledge on PCD, it has not been an objective so far. Furthermore, respondents mentioned that EU delegations indeed hold a dialogue with developing country partners on policy areas with a significant PCD content (e.g. trade, climate change) but it is unclear how this impacts on the way the EU approaches PCD.

➤ **Overall efficiency and effectiveness of PCD tools and mechanisms**

Question: Do you consider that the use of PCD tools and mechanisms has been effective and efficient in influencing EU policies likely to affect developing countries so that they take account of development objectives?

The open public consultation included a specific question on the overall perception of the efficiency and effectiveness of PCD mechanisms. A majority of the respondents (48.3%) that expressed an opinion on the subject considered that the use of PCD tools and mechanisms has not been effective and efficient in influencing EU policies likely to affect developing countries so that they take account of development objectives.

However, the analysis of detailed comments provided by respondents suggests that the question proved difficult to answer by “yes” or “no” for most respondents due to, inter alia, a lack of information on the existing PCD tools and mechanisms, the fact that the efficiency or effectiveness may vary greatly depending on the PCD mechanism, and in general the methodological challenge of assessing the efficiency and effectiveness of such mechanisms.

Respondents generally acknowledged that the EU has gradually strengthened its work on procedures, instruments and mechanisms to promote and enhance PCD and recommended that the EU continues this work.

Regarding to impact assessments, respondents of the open public consultation mentioned as positive developments (i) the introduction in the impact assessment guidelines of a requirement to consider the potential impacts of a proposed policy or regulation on developing countries, which according to one respondent was an important recognition of the PCD obligation; and (ii) the development of a specific tool to guide the assessment of potential impacts on developing countries (Tool #34 of the Better Regulation Toolbox), which one respondent described as a priori a very strong instrument for PCD.

However, all respondents that addressed the impact assessment mechanism in their comments stressed that past studies have shown that in practice only a limited number of impact assessments for policies likely to have impacts on developing countries effectively assessed or even considered impacts on developing countries, which led to some missed opportunities from a PCD perspective. In this regard, respondents considered that the impact assessment instrument is still insufficiently contributing to the goal of PCD in policy outcomes and should be improved as a PCD mechanism.

Some respondents argued that, there is no systematic PCD expertise available. The nature of the PCD concept, and even more the concept of policy coherence for sustainable development, is that every policy department, when in lead on a policy proposal, should take the impact on sustainable development and on developing countries into account. The respondents recommended to enhance the capacity on policy coherence for sustainable development across Commission services.

3.5. Added Value

➤ Added value of the EU approach to PCD for EU Member States

Question: To what extent could PCD objectives (“i.e. taking account of the objectives of development cooperation in the policies that are likely to affect developing countries, Art. 208 (TFEU)”) be achieved by Member States without the EU’s approach to PCD?

The results of targeted surveys suggest that most respondents to the Commission and the EEAS Surveys appear to have some doubts as to whether PCD objectives could be fully achieved by Member States in the absence of the EU’s approach to PCD (with the majority of respondents answering the question with “partially”), while respondents to the EU Member States Survey appear to be more optimistic in this regard (with most respondents answering with “substantially”).

The added value of the EU approach to PCD for Member States is reflected relatively clearly in the responses from the EU Member States Survey. It appears that according to stakeholders the main benefit of the EU approach to PCD is to provide a “common base” for PCD, but respondents highlighted as well that the EU also plays an important role in sharing experiences and best practices, in advocating for the importance of the topic, and in monitoring national PCD efforts – herby reinforcing PCD at all levels.

Question: Do you consider that honouring the commitment to promote PCD by the EU has created additional value, beyond what could be achieved by the EU Member States acting independently?

The open public consultation also included a specific question on the added value of the EU approach to PCD. A majority of respondents (70.4%) considered that honouring the commitment to promote PCD by the EU has created additional value, beyond what could be achieved by the EU Member States acting independently.

➤ Influence of the EU approach to PCD on EU Member States’ own commitment to PCD

Question: To what extent does the EU’s approach to PCD contribute to reinforcing EU Member States’ own commitment to PCD?

Survey results suggest that stakeholders consider that the EU approach to PCD contributed to reinforcing EU Member States’ own commitment to PCD, although opinions vary with respect to the extent of this contribution. Most respondents answered the question with either “partially” or “substantially”. No respondent selected “none” as answer.

3.6. Impact

- **Outcomes and impacts in developing countries of policies that have incorporated an approach to PCD during the policy formulation process**

Question: Are you aware of any positive/negative effects the 4 EU policies listed below may have had on developing countries around the world?

The open public consultation included a specific question on the outcomes and impacts in developing countries of four EU policies that were considered to have incorporated an approach to PCD during the policy formulation process and for this reason had been selected as case studies to evaluate the EU’s PCD at the impact level. The EU policies or initiatives concerned by this question were the following: a) Global Approach to Migration and Mobility; b) EU Action Plan against Wildlife Trafficking; c) Common Fisheries Policy (reform of 2013); d) Generalised Scheme of Preferences.

A majority of respondents to the open public consultation indicated that they were aware of positive or negative effects that the four specific EU policies may have had on developing countries and took the opportunity to comment on the various effects that they had identified.

3.7. Sustainability

- **Political will and continuous learning to ensure sustainability of PCD at EU policy-making level**

Question: To what extent is there adequate political will and continuous learning to ensure sustainability of the EU's approach to PCD at EU’s policy-making level?

Survey results suggest that opinions are split as to whether political will and continuous learning are adequate to ensure sustainability of PCD at EU policy making level, with the majority of stakeholders considering that it was not fully adequate. The majority of stakeholders that responded to the question answered “not adequate” or “nearly adequate”.

Nevertheless, some respondents indicated that in their view PCD (and now policy coherence for sustainable development in the context of the 2030 Agenda) is not a top priority for the Commission leadership, and there is definitely a need to increase political will and continuous learning at the policy-making level across silos. Respondents highlighted that political will and leadership are crucial for the implementation of a PCD approach. So raising awareness for development at the higher political level should be a priority.

➤ **PCD mechanisms embedded in the policy formulation process**

Question: To what extent have PCD mechanisms (i.e. Commission Work Programme screening) and Commission instruments (i.e. impact assessments, inter-service consultation) become a permanent part of a policy formulation process that takes account of the EU's approach to PCD at EU level?

Survey results suggest that although there is a variety of views on the subject, most stakeholders consider that PCD mechanisms have only partially become a permanent part of a policy formulation process that takes account of the EU's approach to PCD at EU level.

Most stakeholders appear to acknowledge that the impact assessment mechanism is the key tool for achieving PCD. However, several stakeholders noted that in practice the number of impact assessments where the impacts on developing countries are assessed remains small.

1.1. Additional views or recommendations on the EU approach to PCD

The questionnaire of the open public consultation included a final open question inviting respondents to provide any additional views they might have on the way PCD has been implemented.

CONCORD (the European confederation of Relief and Development NGOs) and its members used this opportunity to express their views on selected EU policies that have an influence on developing countries.

EU Member States that contributed to the open public consultation also used the opportunity to provide concluding remarks and recommendations for the future. One EU Member State respondent identified the following elements as being crucial for pursuing PCD:

- To formulate a strategy on PCD on a number of priority areas with, for each area, goals aligned with the SDGs, actions being taken to achieve these goals, and progress being monitored and reported on by means of indicators;
- To encourage and use academic research on policy coherence;

- To promote effective dialogue with governments in partner countries to identify important incoherencies and to achieve synergy in resolving them;
- To create opportunities for dialogue with non-governmental organisations and political space for civil society organizations in developing countries to give their views on coherence issues.

ANNEX 3: EXTERNAL EVALUATION

The full report and annexes of the external evaluation can be found here:

https://ec.europa.eu/europeaid/external-evaluation-european-unions-policy-coherence-development-2009-2016_en