

Advice on the Preliminary Draft of the federal plan for sustainable development 2004-2008

- **Commissioned by the Interdepartmental Commission for Sustainable Development (ICSD)**
- **Prepared by the council's various working groups**
- **Adopted by the general meeting of May 12, 2004 (see attachment 1)**

Forcelines of the advice

Appropriate point of departure

- [1] This preliminary draft of the second plan has been construed around six themes of the European strategy for sustainable development that was adopted in Göteborg and Lisbon (2001). This makes for an appropriate point of departure as it contributes to the creation of coherence in the policy of our European partners. The European approach to sustainable development (SD) does, however, encompass more than just those six themes. With the preliminary draft of the second plan (*hereinafter: the plan*), one has made choices within the said strategy. This is necessary: in a multi-faceted domain such as sustainable development, priorities need to be established. The Federal Council for Sustainable Development – FCSD (*hereinafter: the council*) in this respect also appreciates the efforts expended in trying to draft a more concrete and more action-oriented document, in contrast to the first plan.

The correct priorities?

- [2] Nonetheless, the council wonders if in all instances the correct priorities were chosen in the Belgian context. The plan fails to pay quite sufficient attention to the long-term vision on sustainable development for our country, and ignores the question how we can realize fundamental SD objectives like achieving growth without placing additional burdens on the environment or realizing more sustainable production and consumption. There is further inadequate attention paid to those domains of sustainable development where our country's performance is lagging behind, and the balance amongst the three dimensions of SD sometimes appears to be too lightly treated.

No impulse to breaking with trends

- [3] The various actions proposed in this plan fail in their lack of an all-encompassing vision. It appears as if for each one of the six themes, the involved public administrations gathered together various sectoral plans and initiatives under the denominator "sustainable development", without there having been an attempt to frame them within that approach and without attention having been given to the interactions amongst the various sub-domains. The transversal or multi-sectoral character that is typical of a sustainable development approach is barely present in the action part. As a result, this plan is not likely to succeed as an impulse for making a break with trends – for that, its action radius is too narrow in its content, while, also, it barely passes beyond the scope of the governmental policy accord.

A national strategy is needed

- [4] Furthermore, the federal plan pays specific attention to actions that fall within the province of the federal authorities. That is hardly surprising, but the result is that a number of themes that are fundamental to sustainable development are barely touched upon or remain entirely absent as they pertain to a regional aspect (for instance, agriculture). The lack of vertical integration does not contribute to the coherency of the SD policy in our country. The council therefore hopes that the national strategy for sustainable development will here offer a solution. An intergovernmental working group is currently busy with its preparation. Speedy progress in these activities is needed as our country must implement that national SD strategy as of next year if it wishes to abide by its commitment undertaken during the Top of Johannesburg (2002).
- [5] The council requests that the national strategy fill in a number of gaps in the current federal plan. We have already made reference to the time horizon and the action radius: the national strategy should start from long-term future scenarios (10, 20, 30 years...) and introduce an encompassing approach that will horizontally integrate the various policy branches. In addition, in this strategy (and in the drafting of it) there should also be sufficient attention given to the participation of the citizen and to input by the civil society, both to add enrichment to the policy's content and to create a social platform. This is too little the case in the federal plan.

Annual policy evaluation

- [6] In the governmental policy agreement of 2003, the government has engaged itself to an annual evaluation of the policy for sustainable development. The council requests that on that occasion, there also be an evaluation of how well the policy cycle of the sustainable development is functioning. The cycle is, in fact, not operating at its maximum efficiency: there is, amongst other factors, because of timing, too little interaction and coordination between the actors and instruments of sustainable development in our country. The actions in this second federal plan do not offer a follow-up to the related measures from the first plan. In the action part, there is also hardly a reference to the federal reports or to FCSD advisory documents in casu. This does not contribute to building up a knowledgeable body and to policy continuity in terms of sustainable development.
- [7] The council requests that in the course of an annual evaluation of the SD policy, also the process of drawing up the plan be scrutinized. A number of contextual shortcomings in this plan may well be caused by the manner in which the document has been created. The council pleads in this regard for a better coordinated and transparent procedure.

Choice of actions?

- [8] The council appreciates the clear structure of the plan, with its six themes, five actions, and a division "context-description-implementation-impact" for each of the actions. Problem is, nonetheless, that in this structure, actions are sometimes introduced artificially within a theme and, as a result, are worked out in insufficient detail or too one-sidedly (for instance, socially responsible entrepreneurship in the theme of greying). Moreover, the plan contains actions that have little relevance as they form a logical aspect of a welfare state policy but cannot be framed within a vision of sustainable development (for instance, the introduction of family care). All of this while topics of greater impact in a SD framework, such as, for instance, environmental technology, appear not deemed worthy of action in this plan.
- [9] Furthermore, in its action segment, this plan pays too little attention to the global framework of sustainable development: barely a mention is made of the possible consequences of our production and consumption designs for the poverty and the environmental problems in the southern regions of the globe, of the impact of the protectionist policy of the industrial nations vis-à-vis certain Third World products, about the problems of international debt and financing ...

The appropriate instruments?

- [10] Another problem is that the working out of the actions in this plan sometimes leaves a lot to be desired. The analysis of the problem (context) is often correct, but the finishing of it (description-implementation) is too vague and does not go far enough. In this regard, all too frequently the plan refers here to working groups that will be formed, studies that will be commissioned, and so on and so forth. Studies and research are important, but these "soft" instruments will hardly suffice to achieve the SD objectives. The council has already in the past pointed out that for this purpose also regulatory, economic, and fiscal instruments are needed that must be available to be activated in the appropriate fashion as required.

Summary tables for follow-up

- [11] The plan is also too vague in what concerns responsibility for the actions, the resources (budget and manpower) available for their implementation, the term fixed for their realization ... For that reason, the council suggests that as an attachment to the plan consideration be given to the addition of a summary table with such data per action. This table could also present the impact on the three dimensions by the various actions. The evaluation of the effects, now mentioned with every action under "impact", is in fact fleshed out very unevenly. In this respect, it is also regrettable that the plan lacks specific action around indicators for sustainable development. Both for the evaluation of the effects and for evaluation and future explorations, an instrument board of indicators is truly an essential necessity.
- [12] With respect to the communications about the plan, the council suggests framing the initiatives in casu (both for the plan in toto and for the various actions) within a global strategy of communications about sustainable development. By means of this kind of coordination, the coherence that exists amongst the plan's actions will become evident and the various initiatives will reinforce one another.
- [13] Finally, the council applies her transversal analysis to the six chapters in the plan's action segment and formulates a number of specific observations about these themes and their actions. Here, the advice remains restricted to the most important points. Where necessary, the council proposes additional actions or a different kind of detailing for the existing actions.

2. Positioning of plan and advice

- [14] Every four years, the government issues a "federal plan on sustainable development" for our country. The first plan (2000-2004) is nearing its conclusion and the second plan for the next four years is in the drafting stages. The procedure is fixed by the decree of May 5, 1997 "concerning the coordination of the federal policy for sustainable development". This decree provides for a policy cycle on sustainable development with, in addition to four-yearly plans, also bi-annual federal reports and advisory publications of community-based associations. The decree further determines who shall bear responsibility for the plan. The Interdepartmental Commission for Sustainable Development (ICSD), in which also the federal government and the federal public administrations have their representations, is preparing the document and assumes the final responsibility for the total end result. The drafting of the text is proceeding in collaboration with the Task Force on Sustainable Development of the Federal Planning Bureau and with the Federal Programming Authority on Sustainable Development (FPASD).

- [15] The FPASD, founded by Royal Degree dated February 25, 2002, is charged with the organization of the consultations. As it is, prior to the government's adoption of the plan, there will be a public referendum on a draft of the plan. The council's advice forms part of that procedure, and the law determines that it shall be incumbent on the government to justify eventual deviations from this advice. The ICSD and the FPASD will deal with the processing of reactions to the preliminary draft in question, both those of individual citizens and of the FCSD, of other consultative organs and social organizations and, possibly, of parliament or the governments of federal states. This will lead to a planning design that will be submitted to the government for its adoption.
- [16] The consultation period about the preliminary draft of the second plan concludes on May 15. At the latest on July 15, the ICSD shall submit a draft of the plan to the government. The second plan needs, in fact, to be approved prior to September 19, in order that it may become effective as of December 19, 2004 – expiry date of the first plan. More information about these procedures can be found on the websites www.plan2004.be and www.icdo.be.
- [17] The preliminary draft plan counts four chapters. The first two and the final chapter contain general information about the principles, the context and the policy regarding sustainable development. The third chapter is the longest and lays out five actions for each of the six themes of the European strategy for sustainable development such as was adopted in Göteborg and Lisbon. For each action, the plan indicates a context, description, implementation, and impact. This preliminary draft is with its 128 pages more concise than the first plan (140 pages).
- [18] The council contributes to the plan by publishing a more concise advice on this preliminary draft of the second plan than of the first plan. This advice is meant to function as a synthesis document starting from a transversal analysis and limiting the specific analysis to maximum three pages per theme. An all too expansive and specialized text would make it difficult for the government to justify why it might eventually decide not to adopt the council's recommendations. The different council's working groups contributed to this advice, with the working group "Strategies for sustainable development" being responsible for its coordination. In order to prepare the transversal segment of the advice, the council organized four hearings with experts (January 15, 22, 29 and February 26) plus an internal seminar (environmental justice, February 12). To draw up the advice, a total of 28 working group sessions were held (see attachment).

3. General assessment

3.1 Concept of the plan: departure points, themes and priorities

Selective choices from the European strategy

- [19] *"With this second Plan, the federal government wishes to join into the global European strategy and to contribute to its concrete realization"* (§ 2102). The council considers the European strategy for sustainable development (hereinafter: EUSDS) a good choice as a starting point as it can lead to greater continuity in the Belgian policy and as it ensures coherence with the policy of our European partners.

- [20] The themes that the plan considers within the context of this plan, namely the six themes of the Göteborg strategy (2001), are unquestionably relevant. Nonetheless, one cannot claim that they cover the whole of the EUSDS: that strategy is broader and, amongst others, contains also the external dimension of Göteborg (2002), the sixth Environmental action program (2002), the Lisbon strategy (2000), and the Cardiff integration process (1998).
- [21] Thus, the plan pays little attention to the Lisbon objective of turning the European Union into the most competitive knowledge economy in the world. In general terms, the economic dimension in this plan is rather de-emphasized, even though economic growth in a context of sustainable development surely can contribute to improvements in the social and environmental dimensions. Furthermore, the global character that was discussed in the external dimension of Göteborg is generally ignored throughout this plan. And yet, this aspect also is surely a fundamental aspect of sustainable development.
- [22] It is clear then that, within this broad European strategy, the plan has opted for a specific choice. Looked at from the purpose of producing a concise and organized document, this is not only understandable but even necessary. Priorities had to be defined. This lies in line with the council's proposals in her advice regarding the preparation for the Top of the world about sustainable development in Johannesburg.¹ Nevertheless, one may well pose the question whether the choice the plan makes within the action domains of the EUSDS is indeed a happy one, and whether the balance amongst the three dimensions has indeed been respected in sufficient measure.
- [23] The actions that within this plan's themes have been defined are not always relevant when we look at their importance and their urgency for sustainable development in our country. This appears so from an "importance-performance" analysis of the actions: a number of them contribute all too little to the objectives, or are not quite opportune as we are already performing forcefully in this regard. Furthermore, the plan fails to mention a number of actions (or develops them inadequately) that should be given priority as they can greatly contribute to the objectives for sustainable development in our country.
- [24] The council opines that one of the most important points of departure in a plan for sustainable development for our country should be an analysis of the factual shortcomings. Where is Belgium's performance in sustainable development below par when compared to the achievements of the other (European) countries? Where is our country falling short in its efforts to arrive at a sustainable production and consumption? In what areas are we posting too little progress in dissociating growth from the consumption of energy resources and primary materials (a central theme of the EUSDS)?

Defective follow-up of the first plan, the federal reports, the FCSD advice

- [25] As another important point of departure, a plan for sustainable development needs to build on existing policy analyses and instruments in order thus to realize a cumulative greater know-how. In this respect, the first plan for sustainable development is obviously of great importance. In the first chapter of the plan (§ 1203), it is stated that the second plan connects with the first, treating a smaller number of themes and actions: "*In this aspect, it introduces a number of priorities within the global policy frame that was laid down in the first plan*". In the same paragraph, it is further stated that the second plan does not cancel out the actions of the first: "*to the degree that a number of actions have not been carried out and remain valid and effective, the involved public administrations shall exert themselves to achieve their implementation, as it has been determined in the government accord of 2003*".

¹ 2002a06n dated April 2002, § 13

- [26] The council thus expected that this plan, certainly for what concerned the themes that are being treated in both plans, would continue with the concepts and build on the views of the first plan and contain a status of the actions in casu that were mentioned in the latter document.² This is not, however, the case. In fact, in the chapter on actions we seldom find a referral to the first plan. It is evident that the second plan must not simply be a reiteration of the first and that it can adduce other themes and lay down its own accents. However, when, even in the case of identical actions, it ensures no follow-up of the previous plan, there can hardly be question of building up knowledge and of a learning process.
- [27] The council therefore requests that actions in the second plan that were already present in the first would be tagged with a follow-up to the measures proposed in the first plan. The ICSD reports can supply the materials for such an analysis, but a mere referral to it is insufficient in view of the size and the technical nature of the document. The follow-up not only needs to mention what actions have been completed or are still continuing, but also what actions were not carried out and why this has been so. It would also be useful to evaluate the implementation of the completed actions.
- [28] Then there is the point that in this plan's sub-actions barely a reference is made of the federal reports on sustainable development. This while these reference documents not only offer a solid basis but also have defined a number of identical and complementary actions that would certainly justify such a reference. This means that the approach in the second report to problems such as ethical financing, social economy, mobility, health, bio-diversity, energy production and consumption can be relevant for their treatment in this plan.
- [29] In this instance also it pertains that a follow-up and a possible updating of the analysis would contribute to a continuity and a building of knowledge in terms of sustainable development. In this respect, the council can only regret that the ICSD has disregarded the advice formulated by the FCSD about a number of domains treated and about the first plan (see infra under 3.4). In fact, also in the federal reports, the council's various advisory documents receive rather short shrift.

Reviewing the policy cycle

- [30] In terms of its content, the plan does not exert enough effect on the policy cycle of bi-annual reports and four-yearly plans as described in chapter 2. The council is well aware that there exists a timing problem in the process: indeed, the first plan was barely half underway when the second already had to be conceived; the first plan is still continuing, and at the time of publication of the second plan's preliminary draft, the ICSD reports 2003 (reports to evaluate the implementation of the first plan) had not yet been made public. This timing problem is also present for the federal reports: a report that arrives on time to contribute to the preparation of a plan can only evaluate an insufficient period of implementation of the plan preceding it.
- [31] The policy cycle does clearly not function in the optimal way possible. For reasons of timing, amongst others factors, there is too little interaction and coordination amongst the various legal instruments. The council therefore requests that this problem be addressed during the annual evaluation of the government's sustainable development policy³ that was announced in the government agreement of 2003 and to which reference is made also in § 4101 of this plan.

² The council already made a plea for this in its advice mentioned in § 22, 2002a06n, § 13

³ As stated in the government accord, this evaluation will also be founded on an FCSD advice in casu

- [32] The council supports the proposals outlined in this and the following § of the plan for the improvement of the system of reporting and the follow-up of policy and measures. The proposed monitoring of international engagements regarding sustainable development is viewed in a positive light considering its slow implementation in our country. Also the coordination and streamlining of the ICSD reports mentioned in § 4103 is a positive factor: up to now, these reports were indeed somewhat lacking in coherence and accessibility in order for one to be able to formulate a total picture of the situation.
- [33] In what concerns the follow-up of the first plan, the council believes it would be useful that aside from the follow-up per action, the plan could in attachment refer to the overview of the realization of the actions in the first plan: in effect, the ICSD publishes such an account of affairs, both an extensive version and a document with examples of realized actions (cf. website www.icdo.be).

3.2. The action segment: selection, scope, structure

Actions not consistently pertinent

- [34] The council appreciates that this plan qua concept is more practical and better oriented than the first by its consistent definition of five actions within the themes of the EUSDS. This is, also from a communication's point of view, an appropriate approach. The council, however, is of the opinion that the appropriate actions have not always been selected for the different themes. As has already been mentioned in § 23, on the one hand, certain actions that could be expected to be present in a plan for sustainable development are not present while, on the other hand, one rediscovers certain actions that from the standpoint of sustainable development are not as relevant or less of a priority.
- [35] For instance, there is little attention paid to innovation and environmental technology, to integrated product policy, the processing of domestic and industrial waste products, the GGOs, international trade... In contrast, a number of the actions that are mentioned in the plan with respect to pensions, health care, and housing policy form a logical part of a welfare state policy, and if they are not framed within the concept of a sustainable development, they do not quite have the same relevance in this plan. In chapter 4 we shall specifically tackle the question of the relevance of the actions for each theme. Where needed, the council suggests that within the theme an action be replaced by another.
- [36] That the actions are not always pertinent has no doubt to do with the selection method. The council is under the impression that various sectoral sub-actions and sub-projects have been assembled from the departments and bundled under the denominator of sustainable development. This is explicitly so formulated in § 2301 of the plan: *"From the various government sectoral plans and measures we need to forge a coherent whole in order that we may arrive at a sustainable development"*.

Towards an all-encompassing long-term vision

- [37] The council is of the opinion that such an approach puts the cart before the horse. A more logical approach would be to first define the framework from the standpoint of a long-term vision on a sustainable development for our country, taking as its point of departure the analysis of strengths and weaknesses mentioned in [2] and [3], and consequently to approach the sectoral actions out of such a vision. Only then can the selection of the actions meet the criteria mentioned by the plan itself in § 2303 to § 2309: *multi-sector, multilevel, multi-actor character, global dimension, long-term perspective, having recourse to a broad gamut of instruments*. And only then will we be able to call this plan a metaplan for sustainable development, in the sense that it integrates various plans and measures in an all-encompassing policy vision for the long term.

- [38] This long-term vision is hardly present in the current plan. When a timeframe is mentioned, it is done rather in terms of a short-term perspective. No doubt, this has also to do with the procedure of drafting this plan, and the coupling of it to the government accord (see *infra* under 3.5). The council regrets the absence of a future perspective for the long and medium terms, as it is deemed a necessity to be able to frame actions on sustainable development, to give them shape and form, and to establish priorities.
- [39] Only from such a perspective can there be question of a policy reversal and the implementation of a “transition management”: there is, in fact, need for long-term vision to make the transition to sustainable development operational. In that respect, it would be interesting to position oneself vis-à-vis the three future scenarios that were drawn in the second federal report out of the three world visions pertaining to sustainable development (usefulness, management, and transformation).
- [40] The council is conscious of the fact that there is no evident reason to currently review the federal plan from out of a long-term umbrella vision. For that reason, it advocates that such a vision be chosen as the departure point for a national strategy on sustainable development (see §§ 48 and following in this advice).

Structure: clarifying but also limiting

- [41] By defining five actions for each theme, and by its adherence to the division “context-description-implementation-impact”, the plan has received a clear structure (albeit not always filled in coherently) and it is indeed more accessible than the first plan. This is undoubtedly a positive point. The “six times five” structure, however, sometimes feels a little artificial. For instance, the actions 8, 9 and 10 have in an arbitrary manner been positioned in the section on greying: it is clear that “developing community services”, “responsible consumption” and “socially responsible entrepreneurship and ethical investing” are not applicable only to senior citizens. The theme here functions in an artificial way as a hook to hang the actions on.
- [42] More significant still is the fact that because of the coordinated structure of the five actions within the themes, all actions are assigned an identical weight. Crucial actions for sustainable development such as “responsible consumption” and “the right price” are of equal value and are qualitatively and quantitatively developed in an identical fashion as peripheral actions such as “enabling family care”. By failing to define priorities within the themes from out of the encompassing vision mentioned in § 37 in this advice, the impression may be created that sustainable development is a bit of everything, a diffuse whole where anybody and everybody can find something to please him or her.

3.3. Multi-sector, multi-level, multi-actor?

Horizontal integration too limited – no multi-sector approach

- [43] The significance of an integration of economic, social, and ecological questions in the process of development is emphasized in chapter 1, § 1208 of the plan, with referral to the Rio Declaration. However, this multi-sector approach or horizontal integration is not sufficiently evident in the action segment. Too few links are established there amongst the plan’s social, economic, and ecological aspects and, often, they are divorced from one another. For instance, there is no true coupling of the theme ‘mobility’ (with the ecological pressures caused by it) to the theme “health”; action 5 about agriculture remains isolated in the chapter on poverty, without connection to actions in the areas of health, bio-diversity, natural auxiliary resources, labeling; the “social” action 3 “quality and affordable housing” is not linked to the “ecological” action 25 “energy-saving housing” or to the theme “public health”.

- [44] It appears from an analysis of the relationship between the social and ecological dimensions in this plan⁴ that a number of actions are positive for the environment but, from a social point of view, may have dubious consequences. For instance, the proposal in action 28 to bar older vehicles from public roads is no doubt positive for the environment, but its social character is somehow doubtful: for is it not the less privileged in society that for financial reasons are forced to drive those kinds of car? In contrast, some actions have a beneficial social effect but can have nefarious consequences for the environment. An example in this respect is the social housing in action 3 of which it is not said that they also have to meet environmental criteria for what concerns their construction (no further development of open spaces) and eco-efficiency. Such links ought to be better analyzed in this plan, also in relation to the third dimension, the economic one. In chapter 4, we are, per theme, looking more deeply into a number of directions for horizontal integration.

Limited attention for the global character

- [45] § 1206 of the plan mentions Rio-principle seven about the shared but differentiated responsibility. This means that the global dimension of problems related to sustainable development is to be recognized and the developed countries are to take account of the consequences of their policy upon the rest of the world. Here also, the council notes that this principle finds only marginal reflection in the plan's action segment.
- [46] The consequences of actions for other countries, or the international character wherein actions (can) take place, are not sufficiently dealt with. For example, no attention is paid to the problem of international trade. In this respect, the implementation of the existing agreements in the context of the Doha Development Agenda, and the successful conclusion of the current negotiations, would have great significance for a better functioning of the global market in terms of sustainable development.⁵
- [47] Furthermore, the plan fails to mention that a win-win situation in terms of the dimensions of sustainable development in our country does not necessarily translate into a win-win situation on the global plane. There is always the danger that ecological improvements in one's own country may well export the problems of consumption and pollution towards other countries. We therefore need to ascertain that sustainable development in Belgium and in Europe not lead to ecological (and social) dumping in economically less developed countries. In order to better integrate this global context into the plan, the council proposes in the chapter on poverty control and in a number of other chapters actions towards the concretizing of the international dimension.

Towards a national strategy for sustainable development

- [48] Aside from the horizontal, the vertical integration too is a substantial part of any vision on sustainable development. This means that various policy levels, from the local to the international, ought to be working in a coordinated fashion: this requires a multi-level approach to the problem of sustainable development. This is especially important in our federal state, where the competences and instruments for the themes of sustainable development are widely distributed over federal and federate entities. In a recent advice⁶, the council noted in this regard that in our country there are instruments for vertical integration (coordinating administrations, cooperative agreements, inter-ministerial conferences) but these do not always function with optimal efficiency.

⁴ Analysis by Paul-Marie Boulanger (IDD) during an FCSO seminar on environmental justice on 12 February 2004

⁵ Cf. memorandum FCSO to the new government, 2003a04n of May 2003 (§ 24)

⁶ "Vertical integration of the policy on sustainable development and multilevel governance", 2003A09N

- [49] The council notes that this plan, as federal plan, pays special attention to the federal level, and sometimes does, or does not, refer to the competence of the regions and municipalities. Action points that lie within the province of the regional authorities are often neglected – even though they should be given priority – since the federal government is not competent to dictate to regions how they should act. Thus, in this plan, the question of agriculture, which is surely to be counted as being of substantial importance to sustainable development, is barely mentioned, while, in the first plan, extensive attention was devoted to it (§ 277 and subsequent): this is probably because the subject has in the meantime been regionalized.
- [50] This does not in any way contribute to a coherent policy on sustainable development in our country and once again points out how important it is to arrive at a national strategy in this respect. The council thus insists that in the course of this year the question of a national strategy for sustainable development be placed on the agenda (NSDS).
- [51] In this regard, the council draws attention to the commitment our country made in Johannesburg (§ 146) to start with the implementation of a national strategy for sustainable development (NSDS) by the year 2005. The plan makes specific reference to this commitment in §1324 and §4402.
- [52] In order to bring this to pass, a speedy start needs to be made – since not much time remains – with the preparations of this process. It would therefore be useful to concretize the passage in § 4402 of the plan, namely *“the federal government shall take the necessary measures in order to meet the above-mentioned commitment in consultation with other competent administration branches”*, for instance, by establishing a planning, timing, and methodology schedule. The council underwrites the suggestions in the plan to organize, if required, an inter-ministerial conference on sustainable development (§ 1323) or to draw up a cooperative agreement amongst the different policy branches (§ 4402).
- [53] In the meanwhile, the government did on April 2 mandate minister Van den Bossche to form an inter-governmental working group "in order to promote the development of a national strategy for sustainable development ". This working group will in November of this year submit an interim report to the ministerial council. The council opines that this working group marks an initial important step in the process and hopes that all parties involved shall make a constructive contribution to its eventual success.
- [54] As mentioned in § 40 of this advice, a national strategy for sustainable development could form the long-term policy framework for the federal strategy and for the possible strategies for sustainable development of the regions (currently, only Flanders is engaged in a preliminary study of its own strategy for sustainable development).
- [55] Furthermore, our country can also promote the working out of national strategies for sustainable development in the South. In its framework advice on the strategic geographical documents of the Directorate-general for development cooperation⁷, the council insisted that the DGOS encourage the partner nations to allow their development plans to expand into the kind of national strategy wherein the three dimensions of a sustainable development will be integrated. Our development cooperation could assist in this process by formulating advice for sustainable development and by reinforcing the institutional frame for sustainable development in the partner nations.

Limited input of the civil society

⁷ 2003a09n of June 2003

- [56] The plan mentions in § 1210 the participative principle as the main principle for sustainable development. This means that the citizen and the social organizations (the stakeholders) are to be involved in and participate in the policy for sustainable development. This is important in order to achieve a citizen and participative democracy (cf. government accord of 2003) and to make the various stakeholders responsible for what concerns their part in the process of sustainable development.
- [57] The plan refers to this multi-actor character in the §§ 1304 and 1325, and in §§ 4301 to 4304. The council considers it a lacuna that in § 4303 no reference is made to its role as a specific advisory organ for sustainable development that is legally bound to offer advice on the federal plan.
- [58] While the introductory and concluding chapters do pay attention to the participative principle, this is much less the case in the action chapter. There, the plan is focused on the government's role. A possible input by the actors is mentioned sporadically but is not present on a systematic basis. No separate action is devoted to it as is the case in the first plan (*reinforcing the role of the major social groups*).
- [59] The council understands that a federal plan's main concern is for the possible input of the federal government but is of the opinion that the national strategy referred to in the aforementioned § should also elucidate the role of actors other than the public administrations. In this regard, more attention to the allochthones and the immigrants would not be out of place, certainly not where it concerns themes such as inborn poverty and greying (see further chapter 4 in this advice). The civil society can in many various areas contribute its expertise and experience and thus make its contribution to expanding the know-how to achieve sustainable development.
- [60] Also in the South, the civil society can contribute to the policy. In this respect, the council refers to its advice mentioned in § 22 in preparation for Johannesburg and in the frame advice mentioned in § 55, wherein it draws attention to the contribution by the civil society for a sustainable development strategy in the partner nations and to the defective dialogue about the geographic documents with those civil actors.

3.4. Instruments, resources, impact

Too vague a completion, too limited a scope

- [61] In 3.2 we pointed out that certain actions in this plan that have little relevance in a context of sustainable development are given the same weight as crucial actions in that respect. But also where the action happens to be pertinent, its elaboration sometimes leaves a lot to be desired. Certain actions are very relevant, the problem-analysis (context) is correct, but the development (description – implementation) is too vague and not sufficiently far-reaching. Something is lacking in the transfer from *discourse* to action, from intention to realization.
- [62] The implementation of an action consists all too frequently in references to other plans or actions (actions 16,19,20,21,22), the formation of a working group (actions 4,10,18,27,29), the commissioning of a study (action 9,14,24), the formulation of proposals (actions 2, 3,4 and 8)...Illustrative in this respect is the crucial action 22 "the right price" where a working group is announced that by 2007 is expected to have worked out a strategy in this area: and this while the first plan already announced the formation of an identical working group with a more precise program that was called upon to publish its report in 2001.

- [63] The council considers it a positive element that regular reference is made to research and study. Any proper decision-making process relies on a scientific basis, and research and development regarding sustainable development is fundamental for working out exploratory elements for the future. The council therefore requests the concretizing of the proposals mentioned in § 4202 of the plan and their implementation in the near future: on the one hand, that there be greater investment in scientific research on sustainable development and, on the other, also a reinforcement of relevant collaboration amongst science and educational institutions. In this regard, the council requests that the various studies and research projects that are suggested in this plan be carried out in a coordinated manner. The council makes reference in this respect to the Lisbon objective to reinforce the competitive capacity of European enterprises by greater investments in research, education, and professional training.
- [64] As is mentioned in the Commission's most recent spring report, urgency is required in the implementation of the European action plan "Investing in research". One of the important research areas for sustainable development is the research in environmental technology. Technological innovation can in this respect contribute to fast growth at a proportionally smaller consumption of energy resources and primary materials, to greater eco-efficiency for our economy, to a more cost-effective environmental policy, and to socio-economic benefits through the competitive advantage created in the wake of an innovation strategy. Last January, the Commission submitted an action plan on environmental technologies (ETAP) (COM (2004)38) that, amongst other objectives, aims to provide for a stimulus to the competitive capacity and economic growth within the European Union.
- [65] However, the plan does too frequently limit itself to using "soft" instruments like study and research to realize the objectives put forward by the actions: there is hardly an instance of recourse to economic and legal instruments. Because of this, the promise made in § 2307 of the plan is not fulfilled: *the actions appeal to a broad gamut of instruments*. The council has already in the past repeatedly referred to the importance of economic and fiscal instruments, amongst others in its most recent memorandum.⁸
- [66] In the segment "resources" of the first plan, a complete chapter was devoted to fiscality as an instrument in the realization of objectives. The plan notes in § 2313 that it was decided not to repeat this transversal action; nonetheless, the council believes there exist good reasons for doing so. For, indeed, fiscality is an important instrument within a mix of policy resources that must be available to be used in order to realize the kind of dissociation that is crucial for sustainable development (cf. § 24 in this advice). This instrument has already been treated in action 22 within the context of the policy on climate and in a multi-sector approach, the application of it for themes such as mobility and health is readily understandable. Whether the fiscal or some other instrument is better suited to realize the objective will have to be monitored by individual case. But it is important to emphasize in this that an appeal to the fiscal instrument does not need to lead to an increase in fiscal pressure: it also can lead to a reduction or a shifting of fiscal pressures.

An overview of objectives and the implementation of the actions

⁸ Memorandum FCSD to the new government, 2003a04n of May 2003 (§ 35)

- [67] In the matter of resources to implement the action, this plan offers too few specific and concrete data. All too often, there is no indication of the budget and the manpower that is required for the implementation. Sometimes, it is also not quite clear who is responsible for the implementation of the action, and when required steps will be taken (timing). This second plan is in this respect as deficient as the previous one. The council thus refers to its advice on the first plan and once again pleads for a summary table mentioning per individual action who will be responsible for its implementation, what the timing is, what has been provided for with respect to budgeting and resources. This table would, like the one about the follow-up on the first plan, represent a much-needed attachment to this second plan.
- [68] The council considers it a positive factor that every action concludes with an impact analysis. Nonetheless, it is of the opinion that the elaboration of this analysis is too uneven. At times, the aimed-for objectives are clearly described and quantified and we can talk of a true assessment of the effects of sustainable development (EASD). In the case of other actions, however, this is not evident and, for what is mentioned under “impact”, has actually little relevance to an impact measurement (for instance, the actions 5 and 10), or the authors restrict themselves to stating that the impact will be “positive” (action 22). We shall delve deeper into this question in chapter 4. With an eye on a more coherent and more thorough analysis, the council proposes to include also the criterion “impact on the three dimensions” in the comparative table mentioned in the previous paragraph.
- [69] For the monitoring of policy and an EASD, indicators are needed; in the absence of indicators, it is not possible to calculate the impact of measures, nor can we estimate the problems, evaluate the current situation, identify trends, and work out future scenarios. The second federal report devoted extensive attention to this topic in chapter 2, with an analysis of pressures, situation, and response indicators. The first plan underlined the importance of indicators in the §§ 628 and following, and in § 783, as one of the policy’s ten guidelines. Following a first advice in 2002, the FCSD recently issued another advice on the subject of indicators.⁹
- [70] The council regrets that the action segment in this second plan does not hook up with this discussion and hardly pays attention to what ought to be considered an essential subject. For that reason, the council proposes that a transversal action “indicators for the actions for sustainable development” be included into the plan. This action would take for its aim to work out in the near future an operational instrument board for sustainable development for our country. The approach must not be restricted to the federal level: within the context of the national strategy (see §§ 48 and following), it has to deal with a participative national instrument board. In this regard, the council recently formulated a proposal in the advice mentioned in the previous §.

3.5. Communication, sensibilization, and consultation

Not a plan for the public at large

⁹ “Advice on drawing up a participative instrument board for sustainable development in Belgium”, 2004a01n of February 2004

- [71] The council appreciates the efforts devoted to making this plan more accessible than the first one. In this aspect, the FCSD advice in casu¹⁰ has been partially adopted: The document is more concise, better structured, and generally written in a clear style. This is important as, according to the statements by the administration and the competent minister, this plan is (also) meant for perusal by the public at large. This is indeed also evident from the resources employed to promote consultations about the draft (posters, advertisements in daily newspapers, presentations across the nation).
- [72] The council is nonetheless of the opinion that the document is likely to have the greatest appeal to parties at the intermediary level: not the experts, not the general public at large, but the layer in between, that is to say the segment of administration officials, policy makers, actors on the mid-level. Somehow, this is difficult to avoid: a plan for sustainable development will always contain a certain technical quality if it is not to be considered trivial. For that reason, the general distribution of the plan via the social actors, via the presentations and the slides, via the website Billy Globe, and via a summary for the general public is a good initiative. It is a pity indeed that this "unofficial" summary can only be checked out via Billy Globe and thus remains inaccessible to individuals without an Internet connection. An "official" summary with a broad distribution through a number of different channels would have made for a better choice.
- [73] The council regrets that the plan for the different actions fails to elucidate what kinds of social and political choices are needed on the basis of the available information (*cf.* § 25 of the FCSD advice on the first plan). It will be easier for the individual citizen to evaluate the plan at its true worth and to formulate his or her opinion about it when he or she is knowledgeable about the stake and knows what the policy options are. In this way, the objectives set out by the consultation about the preliminary draft will also be achieved more satisfactorily: namely the improvement and the filling-in of the text and the broadening of the platform for the policy. In this respect, the council formulated a number of recommendations in the advice mentioned in § 71 about the need for a consultative strategy.
- [74] The council reiterates the recommendation of § 34 in this advice about a consultative strategy: it would be preferable if the consultation of the public at large (especially oriented towards a broadening of the platform) and of the organized stakeholders (oriented towards corrections and additions to the draft) were not to coincide. "One could opt first to improve the quality of the text via a limited consultation of experts before subsequently consulting the public at large with a more accessible text."
- [75] The council is of the opinion that during the past months the government, in its communications, has passed up a number of opportunities for drawing attention to this preliminary draft of a plan. The special ministerial council in Ostend (March 20 and 21 2004) about "the quality of life", for instance, would have offered a chance to point out that various topics treated there are also being touched upon in this plan, and that the citizen can freely express his or her opinion on the subject. This could have meant widespread media attention for the plan, underlining the involvement of the entire government in it.

A coordinated communication and sensibilization

¹⁰ "Advice on the first plan (2000a02n of April 2000) and advice on the need to develop a consultation strategy and recommendations for consultation about the preliminary draft of the second federal plan on sustainable development" (2003a05n of May 2003)

- [76] The council is of the opinion that it is advisable to frame the communication about this plan within a global strategy for communication about and sensibilization for sustainable development. This kind of positioning in a broader total context would benefit the coherency between and the effectiveness of the different communication and sensibilization actions with respect to the plan. Such initiatives are, in effect, planned for the plan in toto, but also for different actions individually: for instance, actions 2 (consumer protection), 9 (responsible consumption), 12 (improvement of information and communication), 17 (label sustainable development), and 27 (integration of information) are to a major extent centered on information, communication, and sensibilization.
- [77] It would be useful to bundle all of these initiatives and to implement them in a coordinated manner so that, from out of the multi-sector character of sustainable development, the coherence amongst these actions would become evident and make it possible for them to reinforce one another. It is thus a good idea to expand the campaign "*the week of publicity*" announced in § 31216 of the plan into "*a week of sustainable development*", when different sorts of information and sensibilization actions of the plan will be dealt with in a concrete fashion. The council will support this kind of an initiative, which is currently being prepared.
- [78] To orient communication and sensibilization around sustainable development, surveys to determine the scope of likely public support for a given project form important instruments for analysis. They, in fact, make it possible to estimate the ideas, attitudes, and behavioral patterns of the public at large. The council has already in the past commissioned two such surveys for our country (in 1999 and 2002). Today, however, within the constraints of its existing budget, the FCSD finds it difficult to undertake this kind of task on its own. For that reason, the council requests that, in the future, the government itself organize that kind of survey on a greatly expanded scale (every three years, for example), and use the results to adjust her communication and sensibilization strategies, accommodating her efforts also to the cultural component of sustainable development.
- [79] Finally, the council considers it a good communication initiative that the sustainable development projects that were submitted by the social organizations at the request of minister Van den Bossche, will be entered into the plan (*cf. announcement by the minister during the general meeting of the FCSD on February 19, 2004*). In fact, this does not merely promote the concrete and accessible aspect but also expands the *ownership* of the plan.

3.6. The process: how was the plan drawn up?

- [80] From available information on the subject it appears that chapters 1 and 4 of this plan (the transversal segments) were largely written up by the Task Force on Sustainable Development of the Planning Bureau, and that chapter 3 (the action segment) was composed by working groups from the federal departments and coordinated by the ICSD and FPASD administrations. In a final phase, the whole entity was further scrutinized and redacted by an inter-cabinet working group. This process differs from that of the first plan: in that case, the Task Force was involved in all phases of the process and there was no intervention by the cabinets.
- [81] The council does not regard the process for the second plan as a negative per se: the increased involvement by the ICSD, the FPASD, and the policy preparatory cells (cabinets) enlarges this plan's *bottom-up* character within the public administrations and its political scope. Nonetheless, the council poses the question whether the contributions by the various intervening parties was sufficiently integrated into the process, and to what extent there was consultation and coordination amongst all parties involved.

- [82] It is, indeed, a fact that the plan lacks coherence in various aspects, as has repeatedly been pointed out in the previous §§. The transversal character of chapter 1 and 4 cannot be found again in the action segment, in spite of the claim that this is indeed the case (see 3.3 in this advice). In chapter 3 of the plan, various actions are left disconnected from one another and few links are established. In what concerns the last point, it raises the questions whether the various actions have not been treated too independently within the departments-working groups, without direction from a central concept or coordination of the whole. This would to some extent explain the plan's compartmentalization of themes.
- [83] In this connection, the council also asks itself to what extent within the departments, the capacity build-up for sustainable development in casu and the impact assessment such as was announced in the first plan (§ 655)¹¹ did in effect take place. The administration lacks resources and expertise to work out actions and implement them. The council hopes that the cells for sustainable development that were announced in the most recent government accord and to which reference is made in § 4205 of this plan will prove helpful in this problem. According to the minutes of the afore-mentioned special ministerial council in Ostend, these cells are expected to have an action plan drawn up by the end of this year. The council herewith requests the government to free up the needed resources (budget and personnel) in order to make it possible for these cells to function in an optimal fashion.
- [84] A political testing out of the preliminary draft prior to the consultation would be useful. The council has already pointed that out in the mentioned advice about a consultative strategy¹²: *“people must be convinced that the government will consider the suggestions and that the proposals from the plan about which they are being consulted will effectively be implemented.”*
- It is a pity that, in all likelihood, the political rereading by the inter-cabinet working group has in its turn failed to promote the plan's coherency. The priorities of the government accord no doubt received greater emphasis in the third part about the actions, but this political rewriting does not appear sufficiently integrated into the administration's first text – both in terms of content and form.
- [85] The question poses itself whether the larger political scope that is being created by the intervention of the inter-cabinet – incontestably an advantage – has not had an adverse effect in the sense that the greatest common divider has become the norm in terms of content and that the scope has been overly restricted to the government's term. For that reason, the council asks that for the national strategy on sustainable development (cf. §§ 48 and following), wherein an all-encompassing and long-term vision should be introduced, a political testing be carried out by the parliaments as the people's representatives in the political decision-making process.
- [86] The council has no reservations with regard to the involvement of certain actors in the process, nor does it object to a process whereby several actors have input in the drafting of the plan. The council does, however, submit that such an approach must not lead to incoherencies in the text. The council further pleads for transparency in the process, with an unambiguous indication of who is contributing what kind of input.
- [87] Finally, the council requests that this problem evident in the process of drawing up the plan, which is linked to the problem of a less than optimally functioning policy cycle for sustainable development as set out in § 30, be equally addressed during the annual evaluation of the sustainable development policy by the government.

¹¹ The council did enter a plea to this effect, for instance in its memorandum to the new federal government (2003a04n of May 2003, § 31)

¹² “Advice on the need to develop a consultative strategy and recommendations for consultation about the preliminary draft of the second federal plan for sustainable development” (2003a05n of May 2003), § 29

