

# **FCSD: OPINION ON THE PRELIMINARY VERSION OF THE THIRD FEDERAL PLAN FOR SD BELGIUM**

## **Main lines of the opinion**

- [a] The Federal Council for Sustainable Development of Belgium (FRDO-CFDD) regrets the **conditional status** of the preliminary draft of the third federal plan for sustainable development (VOPDO). There is no political agreement about this text and the government may still change its form and contents “*after an evaluation of the federal policy instruments for sustainable development*”. This does not encourage the social actors in the least to take part in consultations about the VOPDO and for the wider public there is additionally the problem that the text is not sufficiently accessible. The government will therefore not be able to rely on social support for its sustainable development policy. The FRDO-CFDD also calls for a totally **different approach to consultation in the future** and, as far as this VOPDO is concerned, **a clear commitment by the government** to include this plan in its policy and to actually implement it.
- [b] The FRDO-CFDD appreciates the emphasis placed in the VOPDO on action. The council also believes that such action has not been sufficiently well thought out or properly worked out on the basis of an elementary conceptual approach, i.e. **problematic situations** with regard to sustainable development in Belgium for which planned, structured action is required. In order to identify those situations and trends that are not sustainable, the plan needs indicators. The VOPDO does not contain any “**instrument panel**” for problem analysis, policy planning or evaluation.  
Apart from the question “How far have we progressed?”, the question “Where are we heading?” must be asked, based on a different conceptual approach for a sustainable development plan. The council regrets that the action of the VOPDO has not been incorporated into any **future exploration** in the form of components of a scenario with the aim of achieving long-term objectives for sustainable development.
- [c] Another shortcoming is the **insufficient monitoring of the action carried out under the two previous plans** for sustainable development. Reference is made to this in the VOPDO but there is no real follow-up of similar measures from previous plans. While there is an obvious problem of implementation in the case of many previous campaigns, working out and solving these problems should be a logical first step for determining new measures. The same problem appears when trying to integrate “**existing federal plans**” under the sustainable development plan. The VOPDO rightly calls such integration crucial and in the analysis chapter sums up a number of relevant federal plans and describes related plans for action on “Interaction with other policies”. This is often just a mere summary with the contributive or integrative character of the VOPDO action plan seldom specified.
- [d] The FRDO-CFDD demands a number of priority actions for sustainable development in Belgium which are not mentioned in the VOPDO but which should be included in the third plan. For instance, action should be proposed so that the **Sustainable Development Effect Assessment (DOEB)** can be implemented with the aim of obtaining a well-functioning and transparent DOEB procedure for the duration of this plan. Action based on **sustainable government assignments** is also desirable to stimulate more sustainable consumption and production. The latter is also the aim of an additional line of action known as **Socially Responsible Entrepreneurship** as a follow-up to the action plan that was launched last year. Emphasis on Socially Responsible Entrepreneurship also enhances the economic approach which has not sufficiently been emphasised in the draft proposal. In this respect, the council has asked for additional action based on **eco-innovation**. For this action, the FRDO-CFDD suggests the setting up of a national committee of authorities and players whose task would be to shape an all-encompassing and integrative approach to eco-innovation in Belgium.
- [e] The reason why the FRDO-CFDD has asked for a “national” eco-innovation committee comes from the fact that both the federal and regional authorities have powers in this respect. This also applies to many other aspects of sustainable development and climate policy in Belgium –

various levels are authorised and in order to have an effective policy, the various levels, federal, regional, local and international, must act together. Based on these attempts at vertical integration, in the action part of the third plan the council asks for **more emphasis on the approach and initiatives at other policy levels** where it should be specified how the various levels can support and strengthen each other's sustainable development policy - the "mutuality principle" as an extension of the "subsidiarity principle".

- [f] Another facet of sustainable development is the **global dimension**. The FRDO-CFDD is of the opinion that sufficient attention should be paid in the action chapter to the relationship between the country's production and consumption pattern and to welfare and environment in the southern hemisphere, the impact of trade and agricultural policy and the international debt and financial problems. The FRDO-CFDD therefore asks for a separate chapter on "challenges regarding poverty and sustainable development worldwide" with, apart from the global action points mentioned in the VOPDO, also additional action to enhance this global dimension.
- [g] The FRDO-CFDD appreciates the fixed structure of the 23 actions in the VOPDO which enhances readability. However, the extension of the various components of the structure are at times somewhat to be desired. The description of the situation is not always based on empirical data. Furthermore, some actions are **not sufficiently ambitious** when it comes to objectives (including too few quantitative and operational objectives) and/or **not specific enough** via particular measures (e.g. action on biodiversity, the sustainable management of the oceans, sustainable housing, etc.). The measures in this VOPDO are frequently aimed at policy support and are often limited to supportive instruments (setting up workgroups, requesting studies to be carried out, drawing up inventories and reference frameworks). In order to make actions operational, a coherent whole of coordinated instruments has to be implemented where communication, legislation and economic and fiscal measures strengthen and support each other.
- [h] The council thinks that the positive aspect of the VOPDO is the fact that in most actions it is specified which institutions are responsible for policy execution (this especially applies to government departments). The FRDO-CFDD also asks for a number of actions to place greater **emphasis on the participative approach** and to get the various social groups more involved. Furthermore, the council appreciates the fact that the deadlines for carrying out these actions are frequently mentioned but thinks that these **deadlines are often too generous** taken over the duration of the plan (see, for example, action indicators, sustainable housing: roundtable discussions with the building sector as from 2010). For particular actions, the FRDO-CFDD asks for a deadline that is more in line with the urgency of the problems society is faced with. Lastly, the council asks that for every action, the third plan should mention **what means and human resources are available** as experience with previous plans shows that actions were often not carried out or were executed poorly as sufficient means and the manpower required were not available.