

Opinion on the Belgian report for the Voluntary National Review 2017

- This opinion was prepared, as requested by the IMCDO, by the following advisory bodies: the Federal Council for Sustainable Development (FDRO-CFDD), RLBHG-CERBC.
- Approved on 30 May 2017.

1. Background

- [a] The UN Sustainable Development Summit¹ took place between 25 and 27 September 2015 in New York. There, heads of states and governments adopted the declaration entitled *Transforming our World: the 2030 Agenda for Sustainable Development*². The central element in the agreement reached at this summit is a set of SDGs³. In fact, there are 17 SDGs and 169 targets⁴. The *2030 Agenda for Sustainable Development (2030 ASD)* consists of five parts: an introduction, a policy declaration, a summary of the SDGs and targets, a section on 'Means of Implementation' and the 'Global Partnership', and a section on 'Follow-up and review'.
- [b] During the 2017 *High-Level Political Forum (HLPF)*⁵ Belgium will present a *Voluntary National Review (VNR)*.⁶
- [c] Stakeholders have responded to the report drawn up by Belgium for this VNR in two ways. Firstly, FRDO members were asked to make a prior contribution. This they did in the form of a compilation document with contributions from the FRDO's member groups. Secondly, the Interministerial Conference on Sustainable Development (IMCDO) asked the FRDO and the other advisory bodies to give an opinion on the draft report for the VNR, with a view to strengthening this report further before it was sent to the UN. This opinion is the result.
- [d] This opinion supplements the other submissions from the various advisory bodies involved about the SDGs and the 2020 ASD, or about the sustainable development strategies conducted at their policy level and the national sustainable development strategy.⁷
- [e] In view of the very short time allowed for drafting this submission, they have opted to issue a general opinion. It was not possible to go into detail about all aspects of the VNR draft report, or about all the SDGs individually.

2. Opinion.

2.1. General comments on the VNR

- [1] The councils welcome Belgium's decision to present a VNR during the HLPF in New York. They thank all the people involved in one way or another with the preparation of this VNR, and express the hope that this constructive approach will contribute to an ongoing, mutually strengthening and ambitious collaboration at all policy levels in the country in the implementation of the 2030 ASD.

¹ See <https://sustainabledevelopment.un.org/post2015/summit> .

² The text of the *2030 Agenda for Sustainable Development*:
<https://sustainabledevelopment.un.org/post2015/transformingourworld>

³ SDGs = Sustainable Development Goals.

⁴ The 17 SDGs and 169 targets: <https://sustainabledevelopment.un.org/sdgs> .

⁵ HLPF: <https://sustainabledevelopment.un.org/hlpf> .

⁶ VNR Belgium: <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=412&menu=3170>

⁷ See the general opinion on the framework text for the national sustainable development strategy: <http://www.frdo-cfdd.be/nl/publicaties/advices/advies-over-de-kadertekst-nationale-strategie-duurzame-ontwikkeling>

- [2] The councils hope that, during the HLPF, Belgium will be able to deliver an attractive presentation of the VNR. They hope that this presentation, and the whole Belgian presence at the HLPF, will give a balanced picture of the way in which our country gives shape to a future-focused policy for sustainable development. On the one hand, it is good that all the valuable initiatives that have already been taken by different policy levels, stakeholders and citizens are identified. But it is also important to take a sufficiently critical look at those areas in which our country is not yet scoring well in the implementation of the SDGs, and at the still inadequately developed policy framework for achieving their consistent, ambitious implementation across all the various policy levels. Such a balanced approach can only contribute to strengthening the image of our country.
- [3] The councils therefore look forward to the summary which policy makers will finally draft after drawing up the report for the VNR. The proposed reporting guidelines suggest that a country should not just present a number of its own good practices, but also some of the lessons learned during implementation and some areas in which support is sought from other countries⁸.
- [4] The councils are happy to be able to make a contribution to the VNR process and appreciate the great efforts which the officials concerned have made at every level under considerable time pressure to produce a report that does justice to the complexity of our country.
- [5] At the same time, they also regret that they have had so short a time in which to reach an opinion, and that they have had to make strong representations to policy makers in order to be given a sufficiently structuring role in this process. The advisory bodies have a statutory duty. The circumstances under which the various advisory bodies had to work (the timeframe provided for a document of such proportions) made it very difficult, almost impossible, to carry out this task properly. It was scarcely possible to organise participation that did justice to the stakeholders' contributions. Nevertheless, some of the stakeholders were and are very willing to become involved in the VNR.

2.2. Comments on the various sections of the draft report for the VNR

- [6] In the opinion of the councils and in line with the proposed guidelines, the VNR report should contain the following three sections: (1) a report of the initiatives and policy plans for addressing the SDGs; (2) an honest and self-critical assessment of the way in which our country has performed in achieving the SDGs; and (3) an analysis of the way in which the SDGs change policy practice and the further adaptations that are necessary in order to fully achieve the SDGs. In the draft report as a whole, there is a relative preponderance of accounts of existing initiatives or policy plans. (This report also appears, in a number of respects, to be a text setting out the policy starting position rather than a real policy plan, and therefore does not demonstrate great ambition). This can lead to a distorted picture. There is not necessarily a direct link between the number of policy plans and their real impact, in terms of achieving the SDGs. The existence of a large number of advisory bodies is even less of a guarantee of a flourishing participative policy culture.
- [7] The report says virtually nothing about the importance of greater global governance and greater policy consistency. These are necessary in order to correct shortcomings on the way to achieving the SDGs.
- [8] The aim of the SDG framework is to create an integrated policy, which is also the essence of the concept of sustainable development. The councils would like to have seen structural attention to the concept of policy consistency for sustainable development in the different parts of the report⁹. Policy consistency entails collaboration and coordination between policy levels (vertically) and introducing

⁸ [Proposal for voluntary common reporting guidelines for voluntary national reviews at the high-level political forum](#)

⁹ See also article [6] of the joint opinion on the framework text for the national sustainable development strategy.

consistency into the different policy areas¹⁰ (horizontally), in part so as to prevent adverse impacts beyond the national and EU borders of policy in our own country. At the least, it would be helpful to include an analysis based on this concept in each section. The councils believe that policy consistency should be a decisive criterion when monitoring the national strategy for sustainable development and in the reports on that strategy. This assessment should be an important task for stakeholders and parliaments. It should entail simultaneous consultations during the progress of the national strategy, but also when drafting the VNR. Policy consistency should be investigated ex ante, through an SDG check or a legislation impact analysis, expanded to include respect for international requirements, including the SDGs, the climate, etc.

2.2.1. Comments on part 1, institutions

- [9] It is helpful to add this section to the report, so that the complex structure of our country can be made clearer to readers. The fact that policy for implementing the SDGs must be shaped in a context of multi-layered policy levels (from local, through sub-national, national and European to global) is not necessarily a problem. It is a starting point, and perhaps familiar and useful for other UN member states.
- [10] The summary in this section gives an insight into the added value and challenges represented by the institutional structure of our country. On the one hand, it has the potential for considerable added value in the diversity of policy levels. For example, a region may lead the way in a certain area, or experiment with new projects. These experiences can be very useful for the other policy levels, and potentially offer a sound learning experience. However, it may also be that there is too little genuine collaboration between the entities, or that there are limited frameworks or arrangements with which to achieve a satisfactorily robust and complementary common policy.¹¹ Where there are difficulties, these are in many cases due to a lack of political will to work together effectively, rather than because of the complexity of the institutional framework. We think it would help readers of this report if there were included a clarification of the opportunities and challenges which the institutional framework of our country poses for the achievement of the SDGs.
- [11] There is a difference between describing what exists or what could exist on the basis of the statutory framework, and explaining whether those structures and plans work and have a real impact. In terms of the federal level, it is worth noting that there may be an impression that the tools provided by the law work normally, whereas, for example, the long-anticipated federal sustainable development plan has still not materialised. It would give evidence of greater transparency if the report also admitted and reported this.
- [12] A similar comment can be made on the national sustainable development strategy, which is mentioned in various places in the report. Readers of the report could perhaps get the impression that our country has a robust, developed national policy plan for achieving the consistent and verifiable transposition of the SDGs. Nevertheless, in the aforementioned opinion the council expressed some reservations about the national sustainable development strategy. Here again, a more transparent account of the reality would prove helpful to the report. Meanwhile the councils are wondering about the final text of the national strategy, how far the draft text was changed after the opinion they issued on it, and whereabouts on the Internet that text can be consulted by the public. In that way, citizens too could better assess the real value of the national strategy that is referred to in several places in the VRN report. In Wallonia, the CWEDD issued a rather critical opinion about the second Walloon sustainable development strategy, observing that that strategy

¹⁰See Article 3 of [Transforming our World: the 2030 Agenda for Sustainable Development](#).

¹¹See also the 2014 joint opinion of the FRDO, ESRBHG, RLBHG, Minaraad, SERV, CESW and CWEDD [on the completion of the transition of Belgium to a low-carbon society by 2015](#). This opinion contains recommendations for constructive and effective collaboration between policy levels.

diverged from the framework established by the 2013 decree on the Walloon sustainable development strategy and that it also lacked in realism and coherence¹².

- [13] The description in the draft report for the VNR (inter alia on p. 6) of the way in which the stakeholders were involved in the process is too rosy, as also described at points [4] – [5] of the present opinion. It appears that the advisory bodies which are reported as having been consulted (on page 5) have not actually been contacted.
- [14] The councils recommend that the importance of social dialogue in the private sector should be recognised, as should the role of vigilance, or the proposal of alternatives by civil society independently of the private sector.
- [15] The councils suggest that, at the international level, Belgium should support participation models such as those existing in the FAO¹³ (like the civil society mechanism CSM¹⁴) and the ILO.¹⁵

2.2.2. Comments on part 2, SDGs and targets

- [16] It is helpful that the description of each separate SDG begins with a contextual description which estimates the real challenges facing each goal. This background is generally balanced. The same balanced approach should preferably be carried through to the rest of the text for each SDG.
- [17] There is little sense of scale in the initiatives reported. ‘Large’ and ‘small’ plans stand side by side. The real weight of each initiative is not always clear.
- [18] An even more structured breakdown would improve the quality of the report. The breakdown per SDG in the VNMR report presented last year by Germany¹⁶ is a possible example. Each section is subdivided into *national challenges, global responsibility, support for other countries, experience/challenges* and a reference to the national sustainable development strategy.
- [19] The attention to the international aspect of the various SDGs is welcomed. However, ‘international’ is interpreted primarily in the sense of being part of our country’s foreign policy, and in particular the development cooperation strategy. But it is just as important, in terms of seeking greater policy consistency and in the spirit of the SDGs, to consider the international consequences of internal policy and the internal impacts of the policy conducted by other countries and international bodies. From this point of view, it is striking that the report repeatedly refers to Corporate Social Responsibility, but there is no mention of the Due Diligence of internationally operating businesses or of the Business and Human Rights national action plan that Belgium must draft.¹⁷
- [20] What is missing from the report is an overall assessment of how our country scores on the SDGs as a whole. From many points of view Belgium is doing fairly well, but it is important (not least for reasons of transparent reporting) to look at those SDGs where it is not so far scoring very well. The fact that there are plenty of action plans for an SDG does not mean, in a number of cases, that there are good results, or not yet. The councils urge the government to pay special attention, in particular

¹² [Projet de deuxième stratégie wallonne de développement durable \(SWDD 2\), 07/03/2016](#)

¹³ FAO = Food and Agriculture Organisation of the United Nations

¹⁴ See <http://www.csm4cfs.org/>.

¹⁵ ILO = International Labour Organisation

¹⁶ See: https://sustainabledevelopment.un.org/content/documents/10686HLPF-Bericht_final_EN.pdf

¹⁷ See the opinion on the Business and Human Rights national action plan [in Dutch and French]: [Advies over het Nationaal Actieplan Bedrijven en Mensenrechten](#).

to the most transformative SDGs where Belgium is not scoring well enough, and to do so on the basis of a number of studies and analyses and the material in the statistical annex.¹⁸

[21] It would also be helpful if this part included an overall analysis of the way in which the existing institutional structure is conducive to the implementation of the SDGs. It would be useful to work out which SDGs would benefit from further improvement of intra-Belgian cooperation, for example climate governance. It would also be helpful to indicate whether there are sufficient arrangements, instruments or locations in which the experiences of different policy levels can be exchanged, with a view to establishing a mutually strengthening cooperation model.

[22] Although it would be helpful at many places in the report, we will not make any detailed comments about individual formulations in the text. However, we do want to make a few more general remarks.

- For the implementation of SDG 12, there is extensive reference to the various policy plans for a circular economy. It is a good thing that there are several current policy initiatives - the EU environmental implementation review¹⁹ refers with approval to many efforts in this field -, but that should not distract attention from the observation that the actual quantity of resources consumed is still too high, and that the dominant patterns of consumption are insufficiently sustainable. Opportunities for local production and consumption should be more widely supported and investigated.
- For the implementation of SDG 1. With respect to the third plan for the fight against poverty²⁰, it should be borne in mind that the timescale foreseen for the consultation of organisations active in this field was very short, and there was no discussion of the text. As part of the Europe 2020 strategy, Belgium set itself the target of reducing the number of people at risk of poverty or social exclusion by 380 000. Since then, the number has risen. Belgium must therefore make a genuine commitment to fight poverty.
- It is unclear why not all the regions and communities are visible in the report (e.g. the Wallonia-Brussels Federation).
- It is unclear why an initiative like the Agenda 2030 Platform is not mentioned.
- It is strange that an initiative like The Shift, valuable in its own terms, should be linked with the Decent Work agenda, when this body has no legal mandate, representativeness or legitimacy in this area, in contrast to the representative socio-economic consultation bodies.
- The attention to Belgian development cooperation initiatives is welcomed. There is no mention of the fact that severe cuts have been made, with possible adverse impacts for the implementation of the SDG.
- The same can be said for education and training for sustainable development. The report talks about how Belgium is making heavy investments, but the recent cuts have hit some of these initiatives hard.
- There is little structural attention to migration.
- The Belgian contribution to international climate finance has not increased. It is therefore incorrect to present Belgium as a relatively large donor to climate finance.²¹
- Lifelong learning is important. There should also be a mention of the importance of preparing employees to work in sustainable sectors.

¹⁸See, inter alia: (1) [Federal Planning Bureau, 2016 Assessment of the SDGs](#), (2) [Bertelsmann Stiftung, Sustainable Development Goals: Are the rich countries ready?](#), (3) [European Environment Agency, SOER 2015, Belgium](#), (4) [The EU Environmental Implementation Review: Belgium](#), (5) [Memorandum of the Institute for the equality for women and men, on the occasion of the elections of 25 May 2014](#) [in Dutch and French].

¹⁹See: [The EU Environmental Implementation Review: Belgium](#)

²⁰See the third federal planning for the fight against poverty [in Dutch and French]: [Derde federaal plan armoedebestrijding](#).

²¹See also the FRDO opinion on climate and development cooperation [in Dutch and French]: [Advies FRDO over klimaat en ontwikkelingssamenwerking](#).

- More attention should be paid to the transition to a low-carbon society and to the studies and initiatives existing in this area.
- We welcome the fact that the report repeatedly refers to the Decent Work agenda, but so far Belgium has no strategy for helping to achieve this agenda in its international policy.

2.2.3. Comments on part 3, horizontal approach

[23] Here the councils reiterate their assessment of the agreements so far reached in respect of the national sustainable development strategy. The arrangements to date are inadequate, and will not suffice to establish an effective and sufficiently robust tool for monitoring the implementation of the SDGs across our country. They refer to the section on the follow-up and review of the 2030 ASD (paragraphs 72-75) and to their joint opinion²² in which they state that organising an awareness-raising event or drafting a progress report are not in themselves enough to establish a structural tool for monitoring the implementation of the 2030 ASD with a strong role for stakeholders. Parliaments should also be structurally involved.

[24] Leading on from this, it would be helpful if the VNR report could include a more transparent analysis of what has currently been agreed, what is necessary and what will actually be done in the coming years to achieve an optimal national implementation of the 2030 ASD.

[25] The councils believe that the presentation is optimistic in its assessment of the advocacy effects. The gulf that exists between the knowledge of policy makers and stakeholders on the one hand and 'ordinary citizens' on the other is deep. Civil society organisations each communicate with their own constituencies, and that makes sense; the site sdgs.be is informative, but for example cannot be found by searching on 'sustainable development' or something similar. Only people familiar with the term will find a way to access it. Extra efforts are needed to inform the unconvinced (education, raising awareness, etc.). This too is part of 'no one left behind'. Only thus can the momentum be created for the profound social changes that are necessary for the implementation of the 2030 ASD. Special attention should be paid to the younger generations.

[26] The councils are pleased to note that in various places the report addresses the gender aspect, not only in SDG 5. This attention could be mainstreamed in all SDGs. The same goes for international solidarity, another fundamental principle of the 2030 ASD.

2.2.4. Comments on part 4, statistical annex

[27] The councils appreciated this annex. It forms an essential part of the report as a whole, and contributes to a better assessment of the progress our country is actually making (or not) in implementing the SDGs.

[28] It might be helpful to include some consideration of the way in which these statistical tools will be further developed in the coming years in order to monitor the implementation of the SDGs by our country and the challenges this will present.

[29] The councils value the work that has been delivered by the services concerned in terms of providing disaggregated data (including data by gender). They hope that our country will remain an advocate for this important target.

[30] The council has questions about the relevance of the indicators chosen per SDG. These include the unemployment rate when measuring decent work (SDG 8), obesity (SDG 2), efficiency (SDG 6) and victims of natural disasters (SDG 13).

²²Opinion on the framework text of the national sustainable development strategy, [11] – [14].

2.3. Comments on the follow-up phase before and after the presentation of the VNR at the HLPF

- [31] The councils would like feedback on how the draft report is adapted after this submission. The councils call upon federal government ministers to organise a round table with the FDRO, ahead of the HLPF. This round table could further discuss the implementation of the 2030 ASD. The councils propose that the report should be explained in the parliaments ahead of the VNR. Finally, the councils would like some information about the Belgian delegation for the HLPF. Will there be places for the stakeholders? And what will be the composition of the delegation?
- [32] The councils hope to receive prompt clarification about the first interim assessment of implementation of the 2030 ASD which is expected in autumn 2017. The councils believe that it is important that this should not merely be an exercise in awareness-raising, but should primarily be a thorough and sufficiently formal evaluation of how matters are proceeding. The councils would like to be clear, as soon as possible, about how the stakeholders and parliaments will be able to play a structural role and how the evaluation will be translated into any adaptation of the agreements and tools established for the implementation of the 2030 ASD.