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The European Union and Policy Coherence for Development: Reforms, Results, Resistance

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ABSTRACT: This article discusses the trajectory of policy coherence for development (PCD) in the European Union (EU). In particular, it argues that the strong focus on institutional mechanisms, conceived as a way of overcoming different types of *resistance*, has had the effect that *results* achieved have by no means been commensurate with the expectations raised by the various *reforms* launched over the years. EU Member States have paid lip-service to the importance of PCD without translating commitments into more coherent (national and supranational) policies. Moroever, through an analysis of the Impact Assessment (IA) – the principal mechanism to promote PCD at EU level – prepared for the reform of the EU's agricultural and fisheries policies in 2011-2013 it shows how bureaucratic arrangements have substantially failed to clarify the real impact of EU policies on (different types of) developing countries. The conclusion is that successful promotion of PCD is more than just having the right arguments and ensuring sufficient technical support, but is first and foremost a political undertaking.

KEY WORDS: Policy coherence for development, foreign aid, EU development policy, Impact Assessment; Common Agricultural Policy, Common Fisheries Policy.

Introduction

The concept of policy coherence for development (PCD), which refers to the synergic interaction between foreign aid and all other development-related policy areas, has received significant attention at both academic and policy levels since the early 1990s. Much scholarly work has concentrated on the theoretical significance of PCD, the factors that enable or hinder its promotion, and the pernicious effects it has on developing countries (Forster and Stokke, 1999; Ashoff, 2005; Picciotto, 2005; Carbone, 2009; Sianes, 2013). Less attention has been attracted by the gradual evolution of PCD from being a donor responsibility, along a North-South division, into becoming a shared responsibility, with both emerging and developing countries playing a more assertive role in relation to actors in the North (Janus et al., 2015). At the policy level, efforts to improve PCD have not been framed as a political endeavour of managing trade-offs between policy interests but instead as a largely technical and managerial process (Adelle and Jordan, 2014; Prontera, 2014). The European Union (EU), recognised as one of the forerunners in PCD discourses (Hoebink, 2004; Carbone, 2012), has also pursued this type of approach. True, PCD has been institutionalised since the 1993 Maastricht Treaty, which provided a first legal basis eventually strengthened by the 2009 Lisbon Treaty, and has taken a prominent place in the 2005 European Consensus on Development and other politically relevant documents. However, the strong focus on institutional mechanisms, conceived as a way of overcoming different types of resistance, has had the effect that results achieved have by no means been commensurate with the expectations raised by the various reforms launched over the years. In fact, most EU Member States have paid lip-service to the importance of PCD without translating commitments into more coherent (national and supranational) policies.

To make this argument, this paper first revisits the trajectory of PCD in the EU, discussing the reforms proposed, the results achieved, and the resistance encountered. Then, it illustrates the clash of the technocratic approach with the political reality through an analysis of the Impact Assessment (IA) – the principal mechanism to promote PCD at EU level – prepared for the reform of the EU's agricultural and fisheries policies in 2011-2013. The final section concludes, reiterating the fact that the successful promotion of PCD is more than just having the right arguments and ensuring sufficient technical support, but is first and foremost a political undertaking.

Adopting reforms

The origin of discussions on how public policies of advanced economies contribute or undermine development goes back to the creation of development cooperation itself. Initiatives between the 1950s and 1980s saw the application of re-adapted versions of technocratic approaches to development, generally imposed by the Bretton Woods Institutions (BWIs), and with the burden placed mostly on developing countries (Forster and Stokke, 1999; Winters, 2004; Picciotto, 2005). It was only in the early 1990s that the concept of PCD took off in official policy discourses. The initial concern was that of increasing the returns of official development assistance (ODA) in the face of decreasing aid volumes - PCD was thus seen as complementing aid efforts - whilst reducing the negative impacts of 'non-aid' policies on broader development processes through 'do-not-harm' approaches. These views were crystallised in the Millennium Declaration and its associated Millennium Development Goals (MDGs). Various donors used the MDGs, most specifically the first seven, as a framework for increased ODA spending. At the same time, through MDG-8, it was universally accepted that foreign aid would have to be supplemented with additional efforts in a number of developmentrelated policy areas, particularly trade, debt relief, and access to medicines and new technologies (Grieg-Gran, 2003; Ashoff, 2005; Picciotto, 2005). By the end of the 2000s, PCD became one of the main components of the 'beyond aid' discourse, as evidenced by the 2011 Busan Global Partnership for Development Effectiveness and the negotiations of the post-2015 agenda: at least at the rhetorical level, there seemed to be a shift from 'do-not-harm' approaches towards more proactive, concerted approaches engaging actors beyond traditional donors and traditional development means (Carbone, 2013; ERD, 2013; Janus et al., 2015).

The Development Assistance Committee (DAC) has certainly represented an important arena for various PCD discussions over the years. The DAC Secretariat, in particular, has sponsored the publication of policy studies and has attempted to elevate the political profile of PCD by supporting ministerial level meetings and declarations, though in vain (Picciotto, 2005; Carbone, 2012). But there is little doubt that the EU has been at the forefront of discussions, owing to inputs from the European Commission and some like-minded Member States (e.g. Denmark, Ireland, Netherlands, and Sweden). The Treaty of Maastricht in 1993, innovatively, provided a legal basis for PCD (though it did not mention the term itself), requiring that the European Community, in its supranational policies, 'take account of the objectives [of development cooperation] in the policies that it implements which are likely to affect developing countries'. The 2009 Lisbon Treaty extended this obligation to the whole of the EU, thus including also inter-governmental policies. Treaty provisions confirm the importance the EU attaches to PCD, but that alone has not been sufficient to guide further action and promote results.

It was then in the mid-2000s that the EU shifted gear, considering that between 1993 and 2005 very little progress could be recorded, partly because of lack of interest of most Member States and partly because of clashes within the European Commission itself (Hoebink, 2004; Carbone, 2008). In the context of an ambitious project to federate the policies of the Member States, not only on 'more and better aid', the European Commission proposed 'coherence for development commitments' in 12 policy areas: trade; environment; climate change; security; agriculture; fisheries; social dimension of globalisation, employment and decent work; migration, research and innovation; information society; transport; energy (European Commission, 2005). commitments were ardently endorsed by the (External Relations) Council in May 2005 (Council, 2005) and were also incorporated in the European Consensus on Development in December 2005 (European Union, 2006). In that context, it was also decided to assign the monitoring process, centred on biennial reports, to the European Commission - though on the basis of information submitted directly by the Member States. The first two biennial reports highlighted significant variations between Member States in how they sought to promote PCD domestically and at the EU level (European Commission, 2007, 2009c). These reports, which acted as a soft version of a 'naming and shaming' strategy highlighting failures and negative effects of non-aid policies, stimulated intense debates in the Council, but not much else. Interestingly, this strategy may have even been counterproductive for engaging policy communities and actors beyond those in development (Keijzer, 2010; OECD, 2014). Unsurprisingly, subsequent reports did not have the same level of ambition or prominence (European Commission, 2011d, 2013).

Different types of resistance combined with lack of evident results (as we will see below) led the European Commission, and some willing Member States, to make some attempts to further specify the EU's aspirations in this area. A first example is the 2009 proposal to concentrate on five global challenges - intellectual property rights, food security, climate change, migration, and security - so that the EU could more proactively contribute to reaching the MDGs by the agreed deadline and could more easily pursue a 'whole-of-the-Union' approach (European Commission, 2009b). The reduction from 12 policy areas to five global challenges received mixed reactions. On the one hand, it was endorsed by the (External Relations) Council, which not only supported the allegedly more focused approach (it also expanded the first area to 'trade and finance'), but also invited the European Commission to 'establish a clear set of objectives, targets and gender-disaggregated indicators to measure progress in the selected priority areas', whilst making better use of the IA procedure, for 'a more focused, operational and results-oriented approach' (Council, 2009, p. 2). On the other hand, it was criticised by the European Parliament's Development Committee, which saw in it a sort of scale-down in ambition from the EU (European Parliament, 2010).³ A second example, which was affected by the commitment of different EU rotating presidencies, is the so-called 'rolling work programme on PCD', detailing concrete steps through which EU Member States and supranational institutions could deliver on the aspirations expressed in EU legal and political commitments. This initiative, which favoured processes over outcomes, did not have much effect besides promoting new, at times heated, debates in the Council (Keijzer, 2012). An ambiguous pattern thus emerged whereby the EU does not speak with one voice but seemingly reaffirms and undermines its own ambitions on PCD.

The overall emphasis on bureaucratic arrangements reflected the popularity that new public management (NPM) and results-based management (RBM) concepts gained

in Europe in the 1990s and 2000s (Di Francesco, 2001; Pollitt and Bouckaert, 2011; Peters, 2015). The promotion of PCD, in theory, benefited from the combined efforts to, on the one hand, improve accountability and transparency of EU policy processes, with the effect of representing policy processes as technocratic problem-solving exercises (in line with NPM thinking), and, on the other hand, draw on performance information to make informed choices, with the view to bringing management improvement and performance reporting (in line with RBM thinking). A key indication of this trend, and certainly one of the main innovations in EU governance over the past decade, is the introduction of the IA procedure in 2003 as part of the process of formulating new policies. The push for IAs was shaped both by the 2001 Sustainable Development Strategy and by the Commission's 'Better Regulation' agenda, eventually replaced by the 'Smart Regulation' agenda (Rowe, 2006; Franz and Kirkpatrick, 2007). By outlining potential positive and negative effects of proposed policy actions, including synergies and trade-offs between competing objectives, IAs represent a tool for the exchange of technical information between interested parties (Bäcklund, 2009). At the same time, they may be used by consensus-seeking actors to de-politicise complex issues (Radaelli and Meuwese, 2010) or may represent the position of some stakeholders at the expense of others (Torriti, 2010). Despite comprising a highly fragmented setup, partly due to the expanding EU legislative competencies and partly as a result of the enlargement process, the European Commission argued that its 'Smart Regulation' agenda would be suitable for effectively promoting and pursuing all horizontal objectives that transcended particular sectors and areas, including PCD. But as we will see below, the pursuit of PCD through managerial means has turned out to be an elusive one.

Achieving results

One of the central challenges that advocates of the PCD agenda face is related to the difficulty to measure results, particularly because they are convinced that evidencebased analyses could help generate significant political support (Carbone, 2012; Barder et al., 2013). The most practicable way to show progress – and the one that has prevailed in official discourses – is that of concentrating on processes (i.e., how things are done) rather than outcomes (i.e., what is achieved) (Di Francesco, 2001). The EU is no exception to this trend: much emphasis has been placed on efforts made by EU Member States and supranational institutions to set up bureaucratic arrangements, often implying a positive correlation between mechanisms and results. Interestingly, the European Commission (2007, 2009c) has noted that the use of various types of mechanisms has produced an increased awareness on PCD across Europe, but only modest results - findings which have been corroborated by non-governmental organisations (NGOs) reports (Concord, 2011, 2013) and independent research (Egenhofer et al., 2006; Stroß, 2014). Mechanisms for promoting PCD comprise different features and vary from one country to another, depending on national political and administrative contexts. They range from 'whole-of-government' approaches, such as the one pursued by Sweden, requiring all policies to contribute to achieving the government's development goals, to dedicated PCD units, such as the one operating within the Dutch Ministry of Foreign Affairs between 2001 and 2012. In other cases more flexible forms of coordination are in place bringing together interested parties, such as inter-ministerial arrangements with PCD mandates, like those in Finland and Ireland (Galeazzi et al., 2013; van Seters et al., 2015). This emphasis on bureaucratic arrangements has also been at the heart of DAC discussions, where it was concluded that the successful implementation of PCD depends on the willingness of countries to cater for three essential 'building blocks', which make up a 'PCD cycle': policy statements setting and prioritising objectives; coordination mechanisms; monitoring and reporting (Hudson and Johnson, 2008). An analysis of the peer reviews of all DAC members since 2000, however, reveals that the three building blocks have proven important to raising awareness across different government departments and ministries, but have not translated into greater PCD (OECD, 2014).

Clearly, the role played by all types of mechanisms in facilitating results remains ambiguous at best, but one fact seems to be widely accepted: 'their impact should not be overstated' (Prontera, 2014, p. 17). In fact, an evaluation commissioned by a group of EU Member States has noted that there is not even a common understanding as to what impact is sought through these mechanisms (Mackie, 2007). Measuring results is complicated not only by a conceptual confusion on how to define development, but also by the absence of a significant body of empirical evidence that can more precisely map the extent to which EU policies affect developing countries. This is the result of a widespread underinvestment in the production of such evidence, and curiously the same countries that have expressed strong commitment to PCD have been reluctant to make available adequate research funding in this area (Hudson and Jonnson, 2008; Galeazzi et al., 2013). Moreover, the reports published by European NGOs, while playing an important role in public discourses, have mostly relied on anecdotal evidence or on suggestive case studies (Concord, 2011; 2013). The consequence of the dearth of evidence-based analysis is that of turning discussions about mechanisms into a largely symbolical exercise (Keijzer, 2012).

Another obstacle to measuring progress in PCD is the absence of either a clear baseline that shows how coherent EU policies are at a given point in time, or any agreement on how coherent such policies should become by a given deadline. This means that assessing progress cannot even result in a debate about whether 'the glass is half-full or half-empty', and instead tends to produce disagreement both on the size of the glass and its contents. Thus, when some (for instance the European Commission) claim that the EU has made substantial progress and others (for instance European NGOs) describe progress as disappointing, both of them may be making valid points. This uncertainty has severely hampered the generation of a results-based approach in the promotion of PCD – in an era in which showing the actual impact of policies has become a matter of public accountability – and has allowed EU Member States and the European Commission to determine their own pace and move the goal-posts along the way (Keijzer, 2010). An attempt to introduce PCD indicators, within both the DAC (in 2009) and the EU (in 2010) was resisted by various countries – including several EU Member States – highlighting the fact that there seemed to be a widespread preference among countries to stay at a general level, rather than being tied to anything that could constrain their freedom or being exposed to public shaming in case of poor performance (King et al., 2012; van Seters et al., 2015). Unsurprisingly, a recent study commissioned by a group of EU Member States has concluded that many countries appear to be, in principle, receptive of the idea of a 'development friendliness index', but at the same time there has been 'insufficient political support for an internationally recognised and institutionalised approach' (King et al., 2012, p. 49).

Thus, the only proxy that could be used to measure outcomes remains the Commitment to Development Index (CDI), published every year since 2003 by an American think-tank, the Centre for Global Development, which compares countries

across a range of policies. Notwithstanding its various limitations (Picciotto, 2005), the CDI serves to highlight two points. Firstly, Europe's collective commitment to development is average (i.e. better than Japan and the USA, but behind Canada and New Zealand) and does not improve as fast as in other parts of the world. More generally, Europe's approach to development can be characterised as 'energetically tackling the symptoms of limited economic opportunities for developing countries by providing substantial and effective aid but doing less to tackle the underlying structural causes of poverty' (Barder et al., 2013, p. 848). Secondly, there is considerable variation between EU countries: the highest ranked nations are small, mainly Nordic countries (i.e. Denmark, Sweden, Luxembourg), whereas some of the larger and richer countries (especially France, Germany, and Italy) perform relatively poorly overall. More importantly, 'the results suggest that every country could improve its score considerably if it did no more than implement policies that have been proved to be politically feasible elsewhere ... even without stretching the envelope of possibilities' (Barder et al., 2013, pp. 837-8).

Facing resistance

Even the most reluctant actors acknowledge the importance of PCD, but problems exist in translating commitments into results. The overall meagre record by the EU, in spite of the various reforms proposed and adopted over the years, is due to three interlinked types of resistance; so much so that the pursuit of PCD has been portrayed as a 'mission impossible' for whoever attempts it (Carbone, 2008) – not to mention the fact that the number of PCD champions has decreased over the years. But before we examine each of them in turn, one general observation must be made: the EU is good at setting normative frameworks, but its compliance record generally does not match its ambitions. This rhetoric-reality gap does characterise other international actors, but 'they have not exposed themselves to it in quite the same way as the EU has due to its proclamations of its distinctiveness in this area and its commitment to a norms-based model of development' (Smith, 2013, p. 526).

The first type of resistance, which has attracted most attention in existing studies, is linked to the 'compartmentalisation' of public policy (Forster and Stokke, 1999; Ashoff, 2005; Adelle and Jordan, 2014; Prontera, 2014). Decisions affecting the developing world involve several policy fields - each characterised by a different set of interests, institutions, and ideas. In the past there was a clear division of labour between those who dealt with international development, and thus defended the interests of poor countries, and those who dealt with domestic development, and thus protected the interests of producers and consumers at home (Grieg-Gran, 2003). Clearly, this old dividing line has lost relevance, not least because the development agenda has substantially widened (Janus et al, 2015). The problem is that not only do different policy communities not necessarily share the same goals - and, of course, in a pluralistic system certain degrees of incoherence are unavoidable – but also that clashes occur with the development domain itself, most notably on the concept of development and its policy implications (Forster and Stokke, 1999; Ashoff, 2005; Carbone, 2008). Policy coherence resonates with the more established concept of coordination, but while coordination is necessary for tackling complex problems, coherence is not an automatic product of coordination (Di Francesco, 2001; May et al., 2005; Peters, 2015). Politicians and policy-makers face difficult choices. It is not surprising that, for instance, they are reluctant to consider the consequences of agriculture and trade protectionism for developing countries. The argument that making public policies more development-friendly serves the EU's own interest in the long-term offers little consolation at times in which the EU's socio-economic model is under considerable stress. The fact that the direct beneficiaries of PCD are located in foreign countries and that the development constituency – mainly consisting of committed politicians and bureaucrats and some NGOs – is far too weak in relation to other interest groups mean that the needs and interests of developing countries tend to succumb (Ashoff, 2005; Carbone, 2008).⁷

The second type of resistance is linked to the EU architecture, most notably the co-existence of intergovernmental and supranational policies. Most studies on PCD tend mainly to highlight the opposition from Member States (Egenhofer et al., 2006; Hoebink, 2004; Carbone, 2008; Stroß, 2014). Their different views on what international development means and implies affects the way in which they deal with intergovernmental (e.g. security, migration) policies. Member States that joined the EU after 2004 are known not to be highly committed in this area (Horký, 2012; Lightfoot and Szent-Iványi, 2014), but neither are founding Member States such as Italy or France (Carbone and Quartapelle, 2015; Cumming, 2015). Thus, the PCD agenda at the EU level primarily moves forward through the involvement and commitment of a selected group of like-minded countries, most notably Denmark, the Netherlands, and Sweden, and partly the UK, who does not use the term PCD (van Seters et al., 2015). But not only do some EU Member States find it difficult to advance the PCD agenda at home, they also block progress on supranational policies (e.g. trade, agriculture, fisheries). By contrast, EU institutions show a more positive, or at least mixed, picture with an increasingly strong, but not always predictable, role played by the European Parliament (Egenhofer et al., 2006; Mackie, 2007; Stoß, 2014). While generally recognised as a key promoter of PCD within the EU, the European Commission is not a monolith, with different types of clashes occurring between its various Directorate Generals (DGs), some territorial and others of an ideological nature (Carbone, 2007). For instance, in the Economic Partnership Agreements (EPAs) there were clear differences in approach between DG Trade and DG Devco (Young and Peterson, 2013). It is also interesting to note that (at least indirect) resistance to PCD comes from those who are eager to strengthen the impact of the EU globally: the argument following that a more coherent EU external action generally entails the subordination of development to foreign policy (Carbone, 2013). The Treaty of Lisbon was meant to bring different policy communities closer together, yet the promotion of different nexuses has resulted in retrenchment and reinforcement of traditional habits (Keukeleire and Raube, 2013).

The third type of resistance comes from (parts of) the developing world, owing to the increased heterogeneity between and within countries (Barry et al., 2010). First, the tremendous growth recorded by some countries in the developing world means that, on the one hand, the separation between developed and developing countries has become blurred and therefore PCD has become a shared responsibility (Janus et al., 2015). On the other hand, it entails that the EU can no longer take for granted that developing countries simply accept what is on offer (Smith, 2013). For instance, the reform of the EU's common agricultural policy (CAP) would benefit middle-income countries who could compete with the EU in global markets, but would lead to preference erosion for low-income countries; it would hurt net food exporters, but would have a more ambiguous effect on net food importers. It is along these lines that there has been opposition by some countries in the African, Caribbean and Pacific (ACP) group to reforms of the sugar and bananas protocols, which had brought them significant benefits

for many years (Matthews, 2008). Secondly, inequality and uneven access to power and resources within developing countries has increasingly become a reality. Elite interest groups, as it happens in developed countries, seek to preserve their influence over specific policy areas to the detriment of the rest of society (Barry et al., 2010). An important example comes from the common fisheries policy (CFP): fees paid by the EU to access waters in developing countries constitute an important source of revenue for central governments, but would not necessarily be welcomed by coastal communities who would feel penalised in terms of both economic development and food security (Bretherton and Vogler, 2008). Interestingly, developing countries have rarely been involved in policy discussions on PCD. For instance, the Cotonou Agreement, governing the relations between the EU and the ACP group, includes an article allowing ACP countries to question any EU policy which could likely have an impact on their development. They have seldom invoked such provision, and when they did it they seemed happy with a simple reassurance by the European Commission that their concerns would be taken into account in the preparation and implementation of future policy measures (European Commission, 2009c; Keijzer, 2010). Of course ACP countries may not receive adequate information or may not have the necessary expertise to engage with the EU. A more plausible explanation, however, is that they do not manage to act as a cohesive group and, therefore, their ability to shape EU policies is necessarily lowered.

PCD in practise: reforming agricultural and fisheries policies

Although the EU has for a long time acknowledged the importance of avoiding incoherence between policies, it would not be an exaggeration to argue that the use of the term 'PCD' owes much to the CAP. Using the analogy of 'giving with one hand and taking away with the other', NGOs have been pursuing and exposing cases of incoherent policy-making for more than 20 years. Many of these cases demonstrated that countries receiving EU aid for agricultural development were at the same time flooded with heavily subsidised agricultural produce from Europe. The other area that historically has received significant attention from development practitioners is the CFP, which already in the 1980s was seen as constituting a major threat not only to the marine environment but also to the life of coastal communities in developing countries. Both CAP and CFP have over the years gone through a number of reforms which have brought tangible benefits to developing countries, particularly to African farmers in terms of market access and to coastal communities with the adoption of the Fisheries Partnership Agreements (FPAs) (Matthews, 2013). At the same time, a number of incoherencies have survived, such as the EU's resort to export subsidies, the increased number of non-tariff barriers, the strict rules of origin, the disappearance of the commodity protocols and the potential negative impact that preference erosion in both agricultural and fisheries policies may have on food security (Matthews, 2013). In line with the purpose of this paper, to illustrate the natural limits of the EU's technocratic and process-oriented approach to promoting PCD, this section limits its scope to one aspect of the recent reforms of the CAP and the CFP, most specifically their effects on developing countries as seen through the two IAs launched in 2011.

The IA procedure was set up by the European Commission (2002) to improve policy-making and advance quality in regulation. Replacing the previous single-sector type assessments, the new system was created to perform an ex-ante integrated assessment of the most important initiatives and those with the most far-reaching

impacts across a range of economic, environmental and social criteria. In terms of the actual procedure, it was established that the lead DG would be in charge of preparing and submitting a 'preliminary' IA to the College of Commissioners, which could ask for an 'extended' IA. It was also stated that Commission DGs would be guided by a series of guidelines, published in 2003 and revised in 2005 and 2009. To improve the quality of IAs, a five-member Impact Assessment Board was created in 2006: its main functions are that of examining the quality of all draft assessments and recommending potential improvements (Bäcklund, 2009). Thus, the primary attraction of IAs, which obviously have a strong rationalistic appeal, would be that of making governments and regulatory agencies rely more on evidence-based analysis and of making them more accountable (Radaelli and Meuwese, 2010). However, the execution of IAs has not met initial expectations: numerous concerns have been raised on their overall quality, particularly the quantification of costs and benefits of alternative proposals and the effective involvement of stakeholders (Kirkpatrick and Franz, 2007; Pollack and Hafner-Burton, 2010; Torriti, 2010). The IA procedure was originally seen by the European Commission as a 'a powerful mechanism' to further advance the promotion of PCD – and was further stressed by the 2009 revised guidelines, stating explicitly that more attention would have to be paid to assessing the impact of all EU policies on developing countries (European Commission, 2009a) - and corresponds to the political commitment expressed by the EU's Foreign Affairs Council, which called for an 'evidence-based and result-oriented approach to promoting PCD' (Council, 2012).

The CAP takes up more than a third of the EU's budget and is frequently cited for its negative consequences for developing countries (Klavert et al., 2011). Despite formally complying with World Trade Organisation requirements, EU-subsidised agricultural products compete unfairly with developing country exports; moreover the presence of high tariffs prevents developing countries from exporting their products to the EU (Te Velde et al., 2013). The CAP has been subject to a series of reforms since its inception which have substantially reduced some of the distortions that it has been generating on world markets as well as its role in the EU budget. Nevertheless, it remains a central component of the EU's internal social and development policy, and its primary stakeholders (farmers and the agri-industry) have exercised strong pressure on EU decision makers to preserve its role as a redistributive, albeit mostly inefficient, instrument (Klavert and Keijzer, 2012). The latest reform of the CAP, started in 2011, was informed by an IA, with DG Agriculture in the lead. The main IA report failed to spell out the effects of the CAP on third countries and instead stated that the effects on developing world markets would be limited under all scenarios considered under the proposed change (European Commission, 2011b, p. 77). Only one of the 12 annexes, which was drafted by DG Devco, contained some references to developing countries. In particular, this annex simply stated that 'impacts [of the CAP] would differ according to the trade profile of the country, i.e. the country's trade balance, whether it is a net exporter or importer of the product in question, relative trade with the EU, the country's level of development and trade regime, or the country's possible preferential status' (European Commission, 2011c, p. 4). Moreover, whilst highlighting the lack of relevant data, it curiously concluded that the CAP has gradually become more coherent with development objectives and that all negative effects on agriculture in developing countries would be further reduced - though the absence of a clear baseline and/or targets in relation to how coherent EU agricultural policy should be made the final recommendations rather vague (European Commission, 2011c).

The CFP constitutes a rather marginal component of the EU budget, yet it is strongly criticised, mainly because it subsidises activities to an extent that in several Member States the estimated costs of fishing exceeds the total value of catches (Engel et al., 2013). The EU is the world's largest importer of fish and fisheries products, of which a substantial part is caught in the territorial waters of developing countries (Keijzer, 2011). The adoption of FPAs in the early 2000s, meant to demonstrate the EU's commitment to both the environment and development, has resulted in a gap between intentions and reality. Structural problems in the fishing sector of developing countries, combined with a number of restrictions limiting access to the EU market, have exposed a number of unresolved contradictions between fisheries and development policies (Bretherton and Vogler, 2008). Also in this case, the proposed reform was preceded by an IA (European Commission, 2011a). Contrary to the CAP, an important PCD-relevant role was played by the IA Board, which explicitly required the main report to address the likely effects of all policy scenarios on third countries. The final IA report, however, largely restricted the analysis to FPAs and Regional Fisheries Management Organisations (RFMOs), and excluded the majority of EU vessels that fish outside EU waters under private agreements or joint ventures, making it difficult to judge the full impact of the changes on developing countries. This was especially problematic for FPAs, given that their nature and operation were analysed without looking at the implications that any changes in FPAs could have for third countries and the ability of EU fishermen to make use of them. Making FPAs stricter could lead to more fishermen no longer fishing under FPAs, and instead using private agreements and joint ventures. By failing to explore how the EU could ensure that its fishing vessels operating in developing countries' national waters outside FPAs act in keeping with the CFP, the IA failed to make an adequate assessment of the likely effects of the CFP reform on development (Keijzer, 2011).

Both the CAP and CFP reform processes indicate that IAs are inherently political processes and that the promotion of PCD is not a matter of solving problems but more one of managing different interest groups, with the more powerful ones generally prevailing. The two IAs did not function as neutral technocratic tools but instead largely served to support the reforms proposed by the European Commission in view of its primary objectives and preferred stakeholder groups. The preparation process of both IAs also shows that there was a low level of demand articulation from developing countries - and European NGOs did not manage to effectively represent their voice either. Moreover, the two reports reveal a serious lack of data on the effect of current and possible future policy reforms on developing countries, resulting from low investments in research related to PCD. More generally, independent analyses (Adelle and Jordan, 2014) and the European Commission (2011d) in one of its biennial reports have noted that IAs have failed to clearly determine the impact of EU policies on developing countries. In 2011, an NGO (Concord Denmark) conducted a screening of IAs from 2009 to mid-2011 and showed that only seven of the 77 relevant IAs actually devoted some attention to developing countries. In 2013, it repeated the same exercise and of the 177 relevant IAs only 33 assessed or mentioned the potential impact for developing countries (Concord, 2011, 2013). There is another point to underline: IAs do not generally distinguish developing countries, thus under-estimating the fact that these are not a homogenous group, and that the same initiative may affect different countries in different ways.

Conclusions

Few examples capture the EU's reputation and credibility in the international arena as well as the concept of policy coherence for development. By providing over half of the global aid, the EU is praised for its high level of ambition in international development, but at the same time is sanctioned for the contradictions of its policies and for its relatively unsuccessful efforts in fundamentally reforming some of its more obviously incoherent policies. This article has shown how discussions on promoting PCD in the EU have evolved from a political and issue-driven agenda to a discussion that promotes a more generalist and horizontal treatment with a major emphasis on institutional arrangements for policy making. This attention should be seen not only as indicative of an evolving understanding of the concept, but more importantly as a compromise that presents a common ground between leading and resistant Member States. Many efforts made in past and present decades have concentrated on efforts to put in place adequate institutional arrangements and mechanisms that are assumed to help improve performance in promoting PCD - in line with the popularity of NPM and RBM concepts that have strongly influenced EU governance since the early 2000s. While providing some hints and guides as far as the EU's ambition and priorities are concerned, they do not adequately address wider conceptual and political challenges associated with the concept, thus hampering further discussion and progress. As illustrated by the recent reforms of the EU's agricultural and fisheries policies, little to no relevant analysis is produced through such processes and the effects in terms of promoting PCD are negligible.

Despite likely being the only way of keeping PCD on the EU's agenda in light of significant Member State resistance, the technocratic focus chosen has prevented a clear management of expectations. Whereas the EU has over the years invested considerable political capital in reporting processes and carefully formulated Council Conclusions, it recently recognised that much work remains to be done and that 'PCD is essential for the credibility of the EU as a global actor' (Council, 2012, p. 1). The EU has underinvested in evaluating the effects of its policies in developing countries, and has not acted on the demand, albeit timid, for more PCD that has been expressed by developing countries. The negotiations towards a post-2015 framework on global development has provided such opportunity, but once again this has resulted in the use of general language arguing for closer collaboration in areas including technology transfer, migration, raw materials and transparent business practices (ERD, 2013; OECD, 2014). Tasking the EU's diplomatic corps with entering into dialogue with developing countries on such contentious issues cannot be adequate. The EU has managed to fill many technical and institutional gaps since enshrining its PCD ambition in EU treaties and in political documents, yet its legitimacy hinges on its ability and willingness to breathe political life into these structures.

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³ One key result of this report was the call for a standing rapporteur on PCD, a position that since rotates between the different political groups represented in the Committee (European Parliament, 2010).

¹ PCD was in disguise in the concepts of 'comprehensive planning' in the 1960s; 'integrated development' in the 1970s; 'structural adjustment' programmes in the 1980s; and 'poverty reduction strategy papers' in the 1990s. The domination of the BWIs in setting the international agenda on development was only partially questioned by the creation of UNCTAD and the demands of the Global South on economically advanced states to avoid undoing the gains of development assistance through adverse public policy measures. These discussions led to the commitment by developed countries in a historical UN General Assembly resolution not only to provide 0.7% of their Gross National Income as Official Development Assistance but also to refrain from increasing or creating (non-)tariff trade barriers to developing countries (Forster and Stokke, 1999; Winters, 2004; Picciotto, 2005).

² The discussion in the DAC involves different levels: (1) important strategic documents, from the 1996 strategy document *Shaping the 21st Century: The Contributions of Development Co-operation* to the 2012 *OECD Strategy on Development*; (2) numerous research publications highlighting the 'development dimension' across a number of different policy areas; (3) various compendiums identifying tools and mechanisms for the successful promotion of PCD (Carbone, 2012). Nevertheless, a recent review, based on expert interviews, has concluded that PCD has gradually become more important at the OECD level, yet it has never been a central priority (King et al., 2012).

⁴ The unit was discontinued in December 2012 following a reorganisation of the Dutch Ministry of Foreign Affairs. The consequence is that the capacity of the ministry in this area has greatly diminished (Galeazzi et al., 2013).

⁵ An important point is that EU Member States make reference towards achieving more coherence at EU level and, generally, have a specific department or unit dealing with EU development cooperation. Yet, awareness of commitments made in the EU context has remained low in ministries beyond those dealing directly with international development (Galeazzi et al., 2013).

⁶ Examples of important exceptions to this pattern are recent pilot studies commissioned by the Netherlands Ministry of Foreign Affairs' Operations and Evaluation Department (IOB, 2014), as well as the inclusion of a specific research call on PCD in the EU's Horizon 2020 research work programme.

⁷ NGOs have been particularly active in the promotion of PCD in numerous countries, for instance in Finland, Germany, Luxembourg, Ireland, Netherlands, and Sweden.

⁸ It should be noted that the ACP group did choose to submit a contribution to the public consultation organised in preparation of the CFP impact assessment (Keijzer, 2011), while no developing country contribution was received in the case of the CAP (Keijzer and King, 2012).