

# Discussion Paper

**No. 153**

October 2013

## **EU Policy Coherence for Food Security** Aligning parallel agendas

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[www.ecdpm.org/dp153](http://www.ecdpm.org/dp153)





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## Aligning parallel agendas

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### Key messages

Derived from the PCD Work Programme 2010-2013, four EU policy areas with a potential impact on food security are discussed: agriculture, fisheries, trade and biofuels.

This paper discusses in how far the EU's commitments and institutional mechanisms for PCD have supported its development objectives in the area of global food security.

Derived from the PCD Work Programme 2010-2013, four EU policy areas with a potential impact on food security are discussed: agriculture, fisheries, trade and biofuels.

Key recommendations to enhance PCD efforts for food security include: stronger linkages between the development and PCD agendas, clearer targets, stronger but realistic political engagement and a broader knowledge base on impacts.

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## Acknowledgements

The authors are grateful for the useful comments and suggestions they received from Andrew Sherriff and Quentin de Roquefeuil from the European Centre for Development Policy Management (ECDPM), and from Niels Keijzer from the German Development Institute (DIE). The findings and conclusions contained within this Discussion Paper remain those of the authors and should not be attributed to any other person or institution. Special thanks go to Alexandra Beijers for her editing and layout work on this paper.

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## Acronyms

ACP	Group of African, Caribbean and Pacific states
AGIR	Global Alliance for Resilience Initiative
ECDPM	European Centre for Development Policy Management
EDF	European Development Fund
EEA	European Environment Agency
EPA	Economic Partnership Agreement
CAP	Common Agricultural Policy
CFP	Common Fisheries Policy
CFS	UN Committee on World Food Security
CSP	Country Strategy Paper
COMAGRI	Agriculture Committee of the European Parliament
CSO	Civil Society Organisation
DCCD	Development Cooperation Coordination Division
DCI	Development Cooperation Instrument
DEVCO	Directorate-General Development and Cooperation - Europeaid
DEVE	Development Committee of the European Parliament
EEAS	European External Action Service
EBA	Everything But Arms
EC	European Commission
ECHO	Directorate-General Humanitarian Aid and Civil Protection
DWF	Distant Water Fleet
EC	European Commission
EDF	European Development Fund
EEZ	Exclusive Economic Zones
EFF	European Fisheries Fund
EPA	Economic Partnership Agreement
EU	European Union
FAC	Foreign Affairs Council
FAO	Food and Agriculture Organisation
FPA	Fisheries Partnership Agreement
FQD	Fuel Quality Directive
FSPF	Food Security Policy Framework
FTA	Free Trade Agreement
GHG	Green House Gas
GID	Global Issues Division
GSP	Generalised System of Preferences
HARD	Head of Agriculture and Rural Development
HLPE	High Level Panel of Experts on Food Security and Nutrition
HRFASP	High Representative for Foreign Affairs and Security Policy
IA	Impact Assessment
IFPRI	International Food Policy Research Institute
ILUC	Indirect Land-Use Change
IP	Implementation Plan
ISC	Inter-Service Consultation
ISG	Inter-Service Group
LDC	Least Developed Country

MEP	Member of the European Parliament
MCS	Monitoring Control and Surveillance System
MDG	Millennium Development Goal
MFF	Multiannual Financial Framework
NPF	Nutrition Policy Framework
ODA	Overseas Development Assistance
PCD	Policy Coherence for Development
RED	Renewable Energy Directive
RFMO	Regional Fisheries Management Organization
SFA	Sustainable Fisheries Agreement
TFEU	Treaty on the Functioning of the European Union
UN	United Nations
UNSRRF	United Nations Special Representative on the Right to Food
WHA	World Health Assembly
WTO	World Trade Organisation

## Executive Summary

1. The EU has made repetitive commitments throughout its Treaties that the Union shall take account of the objectives of development cooperation in the politics it implements which are likely to affect developing countries. This legal obligation is supported by a political commitment in the 2005 European Consensus on Development, the key inter-institutional agreement on development cooperation signed by the European Commission, the European Parliament and the European Council.
2. While the EU is the world's **major development actor on food security**, some of its other policies are still contested as harmful to global food security and agricultural development. The aim of this paper is therefore to assess in how far the EU's legal and political commitments to PCD, as well as the relevant institutional mechanisms in place, have supported its development objectives in the area of global food security. In particular, this paper aims to address:
  - a. What do the EU commitments to promote PCD entail and what tools have been put in place to deliver on this commitment?
  - b. What specific global food security objectives has the EU adhered to that should guide PCD efforts?
  - c. What role have global food security concerns played in key EU policy processes in recent years Development Cooperation Coordination Division (agriculture, fisheries, energy, trade)?
  - d. What lessons can be drawn from this in order to further strengthen the EU's PCD efforts, particularly in the area of food security?"
3. The **PCD Work Programme 2010-2013** outlines thematic policy focus areas for PCD promotion while targets and indicators are in place to track and report progress. An elaborate framework of institutional mechanisms further contributes to the promotion and monitoring of development concerns throughout the EU's diverse decision-making structures. In 2009, the European Council agreed that the EU's agenda for PCD promotion should focus on 5 broad areas where a more pro-active EU engagement in PCD promotion could best support the efforts for achieving the Millennium Development Goals, notably trade and finance, climate change, migration, security and food security.

Whereas the PCD Work Programme indeed helped the Commission to address PCD in a more systemic manner, much remains to be done to increase its usefulness as a guidance and reporting tool for PCD promotion. First of all, the relevant policy areas for each of the 5 PCD priorities are introduced in a brief narrative, yet they lack a clear objective. Second the majority of the indicators are of a general nature and lack adequate specification in terms of baseline data, time-dimension and quantitative measurability. In particular cases, targets are missing or do not cover the policy area fully. Finally, there is no guidance or task division in terms of 'who does what' and while being a 'rolling' work programme, updates never happened

4. As a development actor, the EU plays a leading role in tackling global hunger and malnutrition, either through support to multilateral alliances, as well as through EU aid and development programs. **Strategies to strengthen global food security**, nutrition and resilience were adopted in the past two years to further shape the EU's food security policy while a Food and Nutrition Security Implementation Plan has been put in place to ensure a well coordinated EU-wide approach, focussing on a set of six key priority areas: i) improve smallholder resilience and rural livelihoods; ii) support effective governance; iii) support regional agriculture and food and nutrition security policies; iv) strengthen social protection mechanisms; v) enhance nutrition; vi) resilience building.

While the EU has made great efforts to define its approach to global food security, this paper found that focussing exclusively on development assistance and dialogues with third countries, leaving out specifics on other non-development policies is a missed opportunity. Labelling PCD as a 'parallel process' does not fit the need for a comprehensive approach that maximizes synergies between development and non-development policies.

5. **For food security as a priority area for PCD action**, the PCD Working Programme for 2010-2013 identifies six relevant EU policy areas: i) agricultural policy; ii) trade; iii) research and development and innovation; iv) biodiversity; v) land use and the impact of bioenergy production; and vi) fisheries policy. For each of these six policy sectors, a set of targets and respective performance indicators is provided. Whereas all six of these sub-areas are relevant and necessary to enhance policy coherence for food security, this paper focused on a selection of just four key EU policies where recent or on-going policy reforms could have a significant impact on food security: the Common Agricultural Policy (CAP), the Common Fisheries Policy (CFP), Trade policy and the Renewable Energy Directive (RED).
6. Analysis of the **Common Agricultural Policy** reform process shows that development concerns were indeed present at the technical preparatory stage of the policy process, yet disappeared early on in the political decision-making procedure. In general, development interests have not been granted much attention in the CAP reform since stakeholder involvement and advisory structures are biased toward participants with a direct interest. While the notion of food security indeed features at the heart of the reform, it does so in a way that is at odds with both the global narrative on the right to adequate food in the context of national food security, as well as with the EU's own approach to global food security. Finally, the principal rejection to monitor the CAP's impact on food security in developing countries contradicts the Council's May 2012 request for 'a more evidence-based approach to improve monitoring, implementation and follow-up of PCD action'.
7. Though never at the heart of the **Common Fisheries Policy** reform, development concerns, as well as coherency issues featured throughout the entire policy reform process, from stakeholder consultation to trilogue negotiations. Development stakeholders have welcomed provisions regarding the monitoring and compliance of external fleets operating outside an EU negotiated regulatory framework as previously no such data was available. The limited scope of the CFP's external dimension however displays a problematic interpretation of the concept of PCD. Focussing exclusively on the Union's international obligations and EU vessels operating outside EU waters, the external dimension of the CFP excludes relevant linkages with measures under the internal dimension that are likely to have an impact on fisheries and food security in developing countries.
8. Discussions regarding the proposed amendments to the **Renewable Energy Directive** have centred on the issue of Indirect Land Use Change (ILUC) and the scientific evidence required to justify a policy adjustment. As 'independent research' has served all sides, the ILUC debate cuts to the core of more fundamental concerns regarding the need for knowledge-based development- and climate-proofing of EU policy-making. Whereas indeed more can be done to broaden the knowledge base, a more fundamental discussion is necessary on what to do in times of lack of data or knowledge gaps and when to apply the precautionary principle. While the proposed consumption cap on food-based biofuels sends a clear signal to investors, the cap is set at current production levels instead of prohibiting the use of food crops for EU fuel altogether. Whereas the EC thus recognizes the effect of its biofuels policies on food security, it shies away from a more ambitious approach.

9. This paper also identified elements in the EU **trade** policy-making process that arguably affect the capacity of the EU to take global food security objectives into account. First, there is a need to step up monitoring and evaluation efforts as perceptions of stakeholders differ and the impact of trade measures is complex and diversified. Secondly, the EU has not been upfront about the balance of commercial interests and development objectives in the case of the EPAs. If EPAs are genuinely meant to be tools for trade *and* development, a more considerable role could have been assigned to the Development Commissioner and his staff.
10. A **cross-over analysis** of how food security issues have been addressed in the above four policy areas resulted in the following key recommendations to further strengthen the EU's PCD efforts, particularly in the area of food security:
- a. **Strengthen the linkages between the development agenda and the PCD agendas on food security.** Although the EU Food and Nutrition Security Implementation Plan explicitly aims to foster improvements in coherence, complementarity and coordination, its performance criteria relate primarily to development assistance and dialogues, while PCD is labeled as a 'parallel process'. Vice versa, the PCD Work Programme 2010-2013 fails to clearly link with the objectives laid down in the Food Security Policy Framework.
  - b. **Set clear PCD food security objectives, targets and indicators to better guide policy-making and progress monitoring.** The current work programme seems to have served primarily as a base document for the biennial PCD reporting rather than as a tool for policy-makers in EU institutions and EU member states' administrations to get familiarised with and respect the EU's development commitments.
  - c. **Broaden the evidence-base of PCD impacts on food security.** It is widely recognised that there is a need for a more evidence-based approach to PCD, as also stressed by EU Development Ministers in their May 2012 FAC meeting. The exclusion in the CAP reform of a system to monitor and evaluate the external impact of the CAP contradicts stated intentions by the EU institutions and its MS contribute to a more knowledge-based approach in terms of assessing the differentiated impact of different EU policies on the food security system in a given partner country.
  - d. **Give more political weight to development and food security objectives through institutional fine-tuning and PCD standard setting across different policy areas.** It was noted that in many cases food security and broader development issues are raised at the early phases of policy-making, but disappear in the higher-level political stages of the decision-making process. While it is inevitable that at this higher-level more trade-offs are made and many objectives are reconciled, it needs to be ensured that food security and development concerns are indeed *part* of the agenda of those taking the final decisions. Stronger political leadership is needed to secure such agenda setting.
  - e. **Commission DGs should provide adequate resources to independently analyse the impact of policy options on developing countries.** DG DEVCO should not be left with the 'burden of proof', doing the impact assessments for other DG's policy options.

After over 20 years of legal and policy commitments as well as political rhetoric, this paper lays out why it is **necessary for the EU to get serious and realistic about PCD at the political level in the area of food**

**security.** While many of the considerations noted in this paper are of a technical nature, the four policy processes discussed show there is a real need for political sponsorship and leadership on PCD for food security. Without such strong political drive, there is a distinct lack of scope to promote genuine change toward a more development-friendly EU policy-making and 'success stories' will remain small and anecdotal. Boldly stated, the EU will need greater progress on PCD in order to maintain its credibility.

## 1. Introduction

**The concept of Policy Coherence for Development** flows from the recognition that development cooperation alone will not bring development, and that the effects of other policies can have more decisive consequences for developing countries. It is about ensuring that different policy areas work in synergy with development objectives in order to make development progress.

For the European Union, Policy Coherence for Development (PCD) is both a legally enforceable treaty obligation and a political priority, fully in keeping with its commitment to support the pursuit of the Millennium Development Goals and to improve the effectiveness of development assistance. To operationalize PCD, the EU has put in place a PCD Work Programme 2010 – 2013. This Work Programme outlines thematic policy focus areas for PCD promotion and targets and indicators are in place to track and report progress. An elaborate framework of institutional mechanisms further contributes to the promotion and monitoring of development concerns throughout the EU's diverse decision-making structures. Nonetheless, *'these instruments are not yet used to their full potential'*, as stated in the 2012 OECD DAC peer review (OECD-DAC, 2012a: p. 43), and living up to PCD commitments has in practice delivered mixed results. While the reasons for such hampered progress are multiple, complex and mutually interlinked, they often stem from a limited political willingness to compromise domestic concerns over the benefit of international development. This in turn flows from the unproven interpretation of PCD as a zero-sum game.

In October 2013, the EU will release its fourth biennial progress report on PCD and by next year the European Commission is expected to present to the Council and the European Parliament its second three-year Work Programme to guide EU-wide action on PCD. This Discussion Paper provides insights and considerations regarding PCD promotion by focusing on one of many particular development objectives, notably food security.

**Food security is a major development challenge**, as it is estimated that one in eight people in the world suffer from chronic hunger and many more are food insecure (FAO, 2013). To address this, the EU has effectively put global food security high among its development priorities for the years to come. In fact, with the adoption of the €1 billion Food Facility in December 2008, the EU was the first donor to proactively respond to the global food price crisis of 2007-08. Moreover, since 2006 the EU has provided € 1 billion per year to strengthen food security and agricultural development (IFPRI, 2013).

The objective of this paper is to discuss in how far the EU's legal and political commitments to PCD, as well as the relevant institutional mechanisms in place, have supported its development objectives in the area of global food security.

For that purpose, this paper addresses the following questions:

1. What does the EU commitment to promote PCD entail and what tools have been put in place to deliver on this commitment?
2. What specific global food security objectives has the EU committed to that should guide PCD efforts?
3. In practice, what role have global food security concerns played in key EU policy processes in recent years (agriculture, fisheries, energy, trade)?

4. What lessons can be drawn from this in order to further strengthen the EU's PCD efforts, particularly in the area of food security?"

In terms of structure, Section 2 of this paper briefly introduces the concept of PCD and its implications for modern policy-making and then outlines the EU's policy commitments and institutional mechanisms dedicated to the promotion of PCD. Section 3 provides a descriptive analysis of the indicators and targets for PCD action for enhanced food security as stipulated in the PCD Work Programme for 2010-2013. Subsequently, Section 4 looks into the 'D' of PCD, in this case the EU's development cooperation commitments for food security as recently outlined in a EU-wide Implementation Plan and relevant EC Communications on Food Security, Resilience and Nutrition. Section 5 then examines a selection of four key policy processes drawn from the PCD Work Program, allowing to identify elements in current policy-decisions with likely positive or negative consequences for the food security objectives described in the previous section. Specific attention will go to mapping the efforts made to 'development-proofing' the respective policy-making processes, focussing on potential bottlenecks and institutional challenges. Finally, Section 6 provides a cross-analysis of those challenges and offers suggestions to better align the PCD agenda with EU development strategies in the area of food security.

## 2. The EU agenda for Policy Coherence for Development

**As the world's largest donor for international development**, the European Union (the Commission and the 28 Member States) contributes over half of worldwide Overseas Development Assistance (ODA), accounting for EUR 55.2 billion in 2012 or 0,43% of its collective Gross National Income (EC, 2013a). As development cooperation finds itself under increased political scrutiny and budgetary constraints, donors increasingly look for means beyond aid to realise their international commitments. Whereas ODA will remain of catalytic importance to the development of, in particular, fragile states and Least Developed Countries, overseas aid money has decreased in relative significance as a contribution to economic growth in developing countries, particularly in comparison to other financial flows like foreign direct investments, migrant remittances or public and private debt flows (Development Initiatives, 2012. Driffield and Jones, 2013).

On the other hand, the increasing **liberalisation and globalization** of trade, finance and resource management has changed public policy making to such an extent that it has become hard to think of a policy area without implications for third countries. The fading divide between domestic and foreign policies requires a holistic type of policy making, based on complex balancing exercises aimed at reconciling different and sometimes competing rationales, values and interests.

**In growing recognition of the limitations of ODA** and the sometimes harmful side-effects of a broad range of policies on developing countries, the international donor community has since long stressed the importance of such formal recognition of PCD. Most notably, PCD currently finds a basis in the 8<sup>th</sup> Millennium Development Goal (MDG) and multiple stakeholders, including the EU, the Organisation for Economic Cooperation and Development (OECD) and the UN System Task Team have stressed the need to incorporate PCD as one of the guiding principles for a post-2015 global development framework. Furthermore, the 'Busan Partnership for Effective Development Cooperation', adopted in 2011 by a variety of stakeholders including non-traditional donors like China and Brazil, acknowledged the need to "*examine the interdependence and coherence of all public policies – not just development policies – to enable countries to make full use of the opportunities presented by international investment and trade, and to*

*expand their domestic markets*" (OECD-DAC, 2011). Policy Coherence for Development is to be seen as a key aspect of a gradual transition from aid to development effectiveness.

**The EU is all but new to the notion of Policy Coherence for Development.** In fact it is the only region in the world to have a legal commitment to PCD. For over twenty years, PCD features as a legally binding treaty obligation for the EU and its Member States, ever since the 1992 Treaty of Maastricht stated that all EU policies should take into account the EU's development objectives. Currently, Article 208 of the Lisbon Treaty on the Functioning of the EU (TFEU) constitutes the legal basis for this commitment:

*"Union development cooperation policy shall have as its primary objective the reduction and, in the long term, the eradication of poverty. The Union shall take account of the objectives of development cooperation in the policies that it implements which are likely to affect developing countries".<sup>1</sup>*

**The legal stance is supported by a political commitment** in the 2005 European Consensus on Development, the key inter-institutional agreement on development cooperation signed by the European Commission, the European Parliament and the European Council. Interventions by the European Council have over the years called for a better-targeted PCD agenda. In May 2012, European ministers specifically encouraged the Commission to work on a more evidence-based approach to improve monitoring, implementation and follow-up of PCD action, while adding that *'relevant baselines, indicators and targets should also be developed including for measuring the impact of PCD in a way which demonstrates clear development results'* (Council, 2012a). Most recently, in its conclusions on a previously presented EU vision for the post-2015 development framework called 'A decent life for all', the Council concluded in June 2013 that *'policy coherence at all levels and, in particular, Policy Coherence for Development, need to be enhanced across all sectors, including in their measurability, to better achieve poverty eradication and sustainable development'* (Council, 2013a). Late September 2013, Development Commissioner Andris Piebalgs repeated that PCD had been an absolute priority for him since the beginning of his mandate.<sup>2</sup>

Whereas PCD is essentially a matter of political prioritisation and a consistent decision-making accordingly, it also requires practical measures to translate those commitments into practice. Therefore, the EU has established a **toolbox of institutional mechanisms** to safeguard compliance and monitor PCD commitments throughout EU policy-making processes (see Box 1 for a detailed description of the various mechanisms currently in place).

#### **Box 1 EU toolbox of institutional mechanisms for PCD promotion**

**The European Commission Directorate-General for Development Cooperation (DEVCO)**, and in particular DEVCO Unit A1 on Policy and Coherence, is responsible for the follow up on EU PCD commitments. As such, its mandate is to coach, coordinate and mobilise thematic expertise on PCD across the Commission, while engaging in wider conceptual and policy debates on PCD with other relevant stakeholders like the OECD and the EU Member States. DEVCO A1 also leads the preparation of the PCD Work Programme and the biennial PCD reports. Finally, DEVCO A1 can commission external research on the impact of EU policies on developing countries.

Furthermore, the commission uses the following institutional mechanisms for PCD enhancement:

<sup>1</sup> <http://eur-lex.europa.eu/JOHtml.do?uri=OJ:C:2007:306:SOM:EN:HTML>

<sup>2</sup> <http://blogs.ec.europa.eu/piebalgs/commissioner-piebalgs-response-to-ngo-report-on-policy-coherence-for-development/>

- **Public stakeholder consultations** at several stages of the preparation of policy proposals allow a wide variety of actors, in- and outside the EU, to express their views and position on a particular proposal. Public consultations thus offer a voice to both third countries and civil society organisations (CSO) to flag their concerns regarding the potential development implications of a given policy.
- **Impact Assessments (IA)** are used to identify and analyse potential economic, social and environmental consequences of EU legislative proposals as well as non-legislative policy initiatives. Each year, the Secretariat-General of the EC, in collaboration with the Impact Assessment Board and the different Commission departments, screens forthcoming policy initiatives and decides which of them require an IA – i.e. the most important ones with the most far-reaching implications. Since 2009, the Commission IA guidelines oblige the respective DG's conducting the IA, to establish whether proposed policy options have an impact on relations with third countries, and "*in particular impacts on developing countries – initiatives that may affect developing countries should be analysed for their coherence with the objectives of the EU development policy*" (EC, 2009a). The implementation of this new provision has proven difficult however and a screening exercise by Concord Denmark on all EC IAs between 2009-2013 showed that only 19% out of 177 relevant IAs looked at development concerns.<sup>3</sup> An on-going revision of the current IA guidelines is expected to address these shortcomings and could sharpen the IA as a proper PCD tool.
- **Inter-service consultation (ISC)** amongst Commission services takes place at every step of the decision-making procedures. ISC allows relevant DGs to be involved in any policy process with possible implications for their area of expertise. As such, ISC enables (DEVCO) officials to raise development concerns at an early stage and suggest development-friendly modifications to policy proposals.
- **The PCD Inter-service group (ISG)** provides a second working-level opportunity to identify and monitor policy processes with a potential impact on developing countries. Bringing together participants from the different DGs who act as PCD focal points for their respective policy areas, the ISG constitutes a forum for inter-DG discussions on PCD. As such, ISG's offer an opportunity to identify possible synergies between policies.
- **The PCD Work Programme 2010-2013** serves as the Commission's agenda for PCD promotion in that given timeframe. Following up on previous 'rolling' work plans adopted since the 2006 Austrian EU Presidency, the current Work Programme is more result oriented in the sense that it proposes targets and indicators per identified policy area, so as to provide a scoreboard to track progress. The Work Programme hence constitutes the framework for a biennial PCD progress report. While the Work Programme serves as a reference framework for the EU institutions' work on PCD, it should also serve as a tool for the Member States to guide their reflection and decision-making regarding PCD promotion.
- **A Biennial PCD report** is issued since 2007 by DG DEVCO, based on Member States' and the European Parliament's responses to a questionnaire. Its aim is to monitor progress on EU PCD commitments as stipulated in the PCD Working Programme (see Section 2). The report thus gives a state of play of PCD progress in relevant policy areas. As such it provides a basis for actors at EU and at national level to express concerns and give concrete suggestions to strengthen PCD.
- **Country Strategy Papers (CSP)** generally include a section on PCD or on 'other EC policies', which identifies EU policies that are of particular relevance to the partner country concerned. To date however, the treatment of PCD in CSPs has often displayed a certain lack of understanding of the concept of PCD among the Delegations. It is worth noting that there will no longer be CSP's in relation to the 11<sup>th</sup> European Development Fund (EDF), or in relation to programming under the new Development Cooperation Instrument (DCI).<sup>4</sup>

**The European External Action Service (EEAS)** established a Development Cooperation Coordination Division (DCCD) and a Global Issues Division (GID) to ensure coherence between development cooperation and other key

<sup>3</sup> <http://www.concorddenmark.dk/?type=page&id=448&itemid=1919>

<sup>4</sup> For more information on EDF and DCI programming for the period 2014-2020, we refer to Herrero et al. 2013.

issues of EU foreign action. Hence the EEAS provides an instrument to bolster greater coherency and consistency of EU external action. The EEAS is also invited to participate in relevant ISC and ISG meetings.

**The EU Delegations** are likely to take on an increasingly important role in the Union's PCD efforts. Notably when it comes to the systematic inclusion of PCD in the EU's regular dialogue with partner countries, delegations will play a crucial role toward a better assessment of the impact of EU policies at country-level. DEVCO's PCD Unit therefore regularly organises PCD training sessions for delegation staff, in order to strengthen their understanding of PCD as well as their capacity to flag potential impacts of incoherencies in EU policy-making.

**The European Parliament (EP)**, a co-decision maker on the vast majority of EU legislation and policy initiatives, appointed in 2010 a Standing Rapporteur on PCD with a two-year mandate to enhance further collaboration between the parliamentary committee on development (DEVE) and other EP committees to ensure development-friendly policy making in parliament. The Standing Rapporteur, a position currently held by MEP Charles Goerens (Group of the Alliance of Liberals and Democrats for Europe), thus sits in the EP's Development Committee (DEVE) and is also responsible for the drafting and presenting of a biennial PCD report. To ensure an evidence-based approach, complementary to its right to examine the EC's ex-ante impact assessments, and if necessary ask for updates, the EP can carry out its own IAs to assess the consequences of its 'substantive' amendments to the EC's proposals. On top of its policy-making powers, the EP has oversight and control functions, which allow it to monitor and scrutinize the implementation of EU policies, including how the impact on third countries plays out. (EC, 2011a).

**The Council of Ministers** constitutes the forum where politicians and officials from national administrations discuss and coordinate matters of PCD, mainly through the various preparatory working groups and in the Committee of Permanent Representatives of the Member States to the EU at the Council (COREPER). Given the rather informal coordination on PCD issues at the council, much depends on the willingness and capacity of the rotating presidency to ensure PCD promotion. The EU High Representative for Foreign Affairs and Security Policy (HRFASP) who chairs the Foreign Affairs Council (FAC) and acts as Vice-President of the Commission is mandated to ensure coordination and consistency in the EU's external action. Since the FAC covers development cooperation and humanitarian aid, the High Representative plays a key role in assuring that development concerns receive due attention in the EU's foreign and security initiatives. Like the EP, the Council can also carry out IAs on its amendments to EC proposals.

**The EU Ombudsman** is mandated to investigate matters of maladministration in EU policy and governance. As such, failures to act according to general principles of EU law such as proportionality, human rights and consistency, allow the Ombudsman to press EU institutions to fulfil their obligations. If necessary he can investigate complaints from non-EU citizens regarding loans issued by the European Investment Bank in developing countries. Whereas PCD is thus part of the Ombudsman's mandate, it is not his task to function as an institutional advocate or safeguard for development objectives or PCD.

**Article 12 of the Cotonou Partnership Agreement (CPA)** enables the 79 current members of the African, Caribbean and Pacific Group of States (ACP), to flag harmful effects of EU policy incoherencies and possibly submit amendments to policy measures. So far however, the mechanism has hardly been used, mainly due to a lack of awareness and capacity on the ACP side. Nonetheless, ACP states are familiar with the EU's commitments to PCD and have used the PCD argument in their dealings with EU policy-reforms, e.g. during the reform of the EU sugar regime.<sup>5</sup>

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<sup>5</sup> <http://www.acp.int/content/acpldc-sugar-group-deeply-disappointed-eu-council-proposal-sugar>

### 3. The EU PCD agenda for food security

**EU PCD concerns in the area of global food security** have arguably been around since the very concept of PCD entered EU policy-discussions. Notably the distorting effects of the EU's Common Agricultural Policy (CAP) in the 1980-90's on agricultural development and smallholder farming in developing countries played a significant role in the proliferation of both PCD as a concept, as well as on PCD-thinking for food security more specifically. Since enhancing global food security features as a central element in both the 2005 Consensus on Development and the Commission's 2012 Agenda for Change, it has been one of the main focus areas for PCD promotion.

In 2005, the Foreign Affairs Council (FAC) structured the EU PCD approach around twelve policy areas, of which the majority has a clear relevance for global food security: trade, environment, climate change, security, agriculture, fisheries, employment, migration, research and innovation, information technologies, transport and energy. While maintaining the focus on these 12 policy areas, the Council agreed in 2009 - in line with the recommendations of the biennial progress report on PCD that year- that the EU's agenda for PCD promotion would benefit from a more targeted approach built on 5 broad areas where a more proactive EU engagement in PCD promotion could best support the efforts for achieving the Millennium Development Goals, notably trade and finance, climate change, migration, security and food security. Given the increased importance of food security on the global and European development agenda since the 2007-08 food price crises, food security is likely to remain one of the focus areas for PCD promotion. The recent adoption of a EU-wide Food and Nutrition Security Implementation Plan could in this respect provide new impetus to further bolster PCD objectives for enhanced food security and should inform the design of a PCD Work Programme post-2013.

**For food security as a priority area for PCD action**, the PCD Working Programme identifies six relevant EU policy areas: i) agricultural policy; ii) trade; iii) research and development and innovation; iv) biodiversity; v) land use and the impact of bioenergy production; and vi) fisheries policy. For each of these six policy sectors, the Commission stipulates a set of targets and respective performance indicators. Table 1 gives an overview of these six policy areas and their respective targets and indicators.

**Table 1 Targets and indicators for PCD action on food security (PCD Work Programme 2010-2013)**

Priority policy area	Targets	Indicators
<b>Agricultural policy</b>	To prepare a post-2013 CAP reform taking into account food security and development objectives in a balanced manner.	Communication on post-2013 CAP reform considers impact on development objectives
	To propose EU initiatives in the field of agricultural product quality policy taking into account development objectives.	Development objectives are taken into account in preparing impact assessment for agricultural product quality policy initiatives.
<b>Trade</b>	Not indicated	Not indicated

Priority policy area	Targets	Indicators
<b>Research and Development and Innovation</b>	To strengthen research efforts targeted on malnutrition and agricultural production	Identify and share with the Research community in Africa research needs on malnutrition.
	To strengthen research into agricultural production	Number and value of research projects launched under the Framework Program 7 on agricultural production
<b>Biodiversity</b>	Step up the EU contribution to averting global biodiversity loss (in accordance with the 2020 EU biodiversity target)	Terrestrial and marine protected areas have increased since 2009 (MDG indicator).
		Improvement in the state of the World's plant and animal genetic resources for food and agriculture.
		Increase in fish stocks within safe biological limits since 2009.
<b>Land access and use and impact of bioenergy production</b>	To progress towards greater security of access to land and of land tenure to protect vulnerable groups.	Agreement at EU level on principles for responsible investments in agricultural land (2010).
<b>Fisheries policy</b>	To adopt a reform of the post-2013 CFP which takes into account development objectives.	Proposals for post-2013 Common Fishery Policy are based on an Impact Assessment, including an assessment of the impact on developing countries.

**A critical look at the Work Programme** identifies several shortcomings. Prior to the design of the Work Programme for 2010-2013, several EU Member States noted that it was a lack of concretisation and result orientation that had hampered the use and effectiveness of previous rolling work plans for PCD. The main objective of the new Work Programme was thus to make the EU's objectives for PCD promotion explicit, while improving accountability so as to ensure adequate action. According to the Council Conclusions of November 2009, the PCD Work Programme was *'to outline the respective roles of the EU Institutions and the Member States'*, while focussing on the following four objectives (Council, 2009):

- outline how the EU through all its relevant policies, processes and financial means will address the **five priority issues** selected harnessing the development potential of its policies;
- create a **political momentum** from all relevant policy areas with an impact on the five priority issues;
- establish a clear set of **objectives, targets and gender disaggregated indicators** to measure progress in the selected priority areas;
- facilitate engagement in and **inclusion of PCD in dialogue with partner countries** around the selected priority areas.

Whereas the PCD Work Programme indeed helped the Commission to address PCD in a more systemic manner, much remains to be done to increase its usefulness as a guidance and reporting tool for PCD promotion. The 2011 PCD report notes in this respect that a review and update is needed in order to

further increase the Programme's objectivity and efficacy. While the main critiques on the quality of the Work programme are indeed well known by now<sup>6</sup>, it is worth looking into them as they i) reflect more fundamental concerns regarding the drafting process of the Programme; ii) allow us to draw links with some of the bottlenecks for PCD promotion in the policy-processes discussed in section 4 of this paper and iii) offer valuable lessons and considerations regarding the post-2013 PCD monitoring.

- First of all, the relevant policy areas for each of the 5 PCD priorities are introduced in a brief narrative, yet they **lack a clear objective**. This ambivalence makes it hard to assess whether the respective operational targets and indicators are adequately ambitious since they cannot be linked back to a clearly defined envisioned end result. Needless to say that hampers any appropriate monitoring or evaluation of progress made.
- As a result, the majority of the **indicators are of a general nature** and lack adequate specification in terms of baseline data, time-dimension and quantitative measurability. Vague wording like 'improving', 'taking into account' or 'in a balanced manner' further obscures any qualitative detail for progress tracking.
- In particular cases, **targets are missing or do not cover the policy area fully**. For example, in the case of 'Trade' as a sub priority area for food security, no specific targets or indicators are mentioned. In the case of 'Land access and use and impact of bioenergy production', no indicators refer to bioenergy or its potential impact on land use in developing countries.
- In response to the Council's instructions, the Work Programme is presented as an important step towards strengthened dialogue with developing countries on PCD issues, since *'on the basis of the programme, developing countries might identify relevant initiatives on which to engage in a dialogue with the EU'*. The initiative to engage in such a **dialogue is thus left to the developing country community**. As such, the programme somewhat contradicts its own mission statement as an instrument for a more pro-active EU engagement on PCD.

Despite i) being conceived as a tool for all EU institutions and Member States and ii) the Council's demand for the Work Programme to outline a **task-division** among the EU institutions and the Member States, the Work Programme does not provide guidance in terms of 'who does what'. Also, being drafted by the Commission with little external consultation, the Work Programme suffered from a lack of EU-wide ownership, particularly from the Member States (EC, 2011a). Research by ECDPM on the developments in national PCD mechanisms showed that, whereas EU PCD commitments and in particular the biennial PCD progress reports play some role as a driver for general PCD commitments at Member State level, the extent to which Member States use the Work Programme as a guide to identify PCD priority areas differs greatly (Galeazzi et al., 2013).

<sup>6</sup> For a detailed analysis of the 2010-2013 PCD Work Programme, see: Keijzer, N. 2010. EU Policy Coherence for Development. From moving the goalpost to result-based management? ECDPM Discussion Paper 101. Also, the EU 2011 PCD report notes in this regard that *"according to the Member States' contributions, items to discuss in greater depth include the evaluation of results, division of responsibility among EU institutions and the Council's perceived lack of ownership of the PCD Work Programme. For most Member States who responded to the PCD questionnaire, a plan specifying how issues are raised in work groups and within the Council is needed"*.

- Whereas the PCD Work Programme is introduced as a '*rolling work programme, to be regularly updated*' such **updates never happened**. Hence targets and indicators were not renewed in accordance with evolving policy initiatives.

Many of the remarks listed above point to **more fundamental concerns regarding the collective drive for PCD**. The drafting and consultation procedures in the formulation process of the Work Programme required five Inter-Service Groups, composed of representatives of all relevant Directorates-General, to agree upon objectives, targets and indicators. As such, the overall level of ambition and specificity of the Work Program reflects the PCD commitment across the Commission's services. Whereas PCD is indeed about reconciling diverging interests, which may require difficult trade-offs at different levels of policy-making, the lack of ambition of the Work Program limits the actual usefulness of translating EC policy commitments into a result-oriented work plan. Moreover, it affects the overall credibility of PCD commitments made at the political level. Note that the design of the Work Programme directly affects the usefulness of progress assessments like the biennial PCD report, as well as the overall scope for PCD promotion throughout the policy processes identified in the Work Programme, as is discussed in section 5 of this paper.

## 4. The EU development agenda for food security

The EU plays a leading role in tackling global hunger and malnutrition through its support to multilateral alliances and EU aid and development programs. Smallholder agricultural development features prominently at the EU's development agenda and since 2006, the European Commission has committed €1 billion annually to enhance food security and sustainable agriculture across the world (IFPRI, 2013).

This section discusses the **priorities and strategies for food security in EU development cooperation**. Focus is on the recently endorsed EU Food and Nutrition Security Implementation Plan (IP) entitled '*Boosting food and nutrition security through EU action: implementing our commitments*'. These commitments the title speaks of, refer to three prior communications by the Commission. Notably, the Food Security Policy Framework of May 2010, the EU approach to resilience and the EU Nutrition Policy Framework, the latter two endorsed by the Council in May 2013.

The analysis below serves the purpose of further deconstructing the 'D' in PCD. What objectives has the EU set for itself in the area of international food security? The EU, through these different communications, has usefully equipped itself with clear international food and nutrition security goals. While primarily designed to guide development cooperation initiatives through the ongoing programming for the period 2014-2020, these goals should also shape PCD efforts. They can therefore help focus a post-2013 PCD Work Programme, justify particular PCD initiatives and assess (ex-post) if the EU's international food security ambitions have materialized.

## 4.1. EU Food Security Policy Framework

In May 2010, following the 2007-08 food price crisis and ten years after the objective of halving the world's hungry was declared a Millennium Development Goal, the EU endorsed a common *EU policy framework to assist developing countries in addressing food security challenges*.<sup>7</sup> By adopting a common Food Security Policy Framework (FSPF) in coordination with the Member States, the EU explicitly put food security and sustainable agriculture higher among its development priorities for the years to come.

The policy integrates most of the key issues associated with the recently emerged international narrative on food security and has been welcomed for its “**Right to Food**”-approach and its straightforward priority setting. Using a comprehensive approach to food security, addressing the issue in both rural and urban contexts, the framework recognizes that strategies are to be country-owned and country-specific in order to be effective. Geographically speaking, the policy prescribes a focus on those food insecure countries and regions that are most off-track in achieving MDG1, notably Africa, South Asia and countries in fragile situations.

A key aspect of the EU's approach to tackling food security is that **smallholder farmers** and vulnerable communities are targeted as societal groups that yield the best returns in terms of poverty reduction and agricultural growth:

*“this new EU framework therefore concentrates on enhancing incomes of smallholder farmers and the resilience of vulnerable communities, supporting the resolve of countries that prioritise agriculture and food security in their development efforts”* (EC, 2010a: p. 3).

To achieve this, the FSPF is based on the four broad pillars of food security: i) increasing availability of food; ii) improving access to food; iii) improving nutritional adequacy of food intake; and iv) enhancing crisis prevention and management. Streamlined into an equal number of interlinked priority themes, the EU's policy on food security focuses on: i) improving smallholder resilience and rural livelihoods; ii) supporting effective governance; iii) supporting regional agriculture and food security policies; and iv) strengthening assistance mechanisms for vulnerable population groups.

In order to allow for maximal effectiveness of food security investments, it is indicated that the EU and its MSs will pay extra attention to national and regional agriculture and food security policies and strategies, improving the coherence of the international governance system and harmonising EU interventions. **As a common policy framework for the EU and its Member States** to guide their efforts against world hunger and malnutrition, the FSPF puts considerable emphasis on this latter aspect of harmonisation and aid effectiveness more generally. In the spirit of the Paris Declaration on Aid Effectiveness, the Accra Agenda for Action and the EU Code of Conduct on Division of Labour, the FSPF stresses that harmonisation of policies, complementarity of instruments, as well as coordination with private investments should contribute to more effective action.

**Regarding Policy Coherence for Development**, the FSPF does not refer to the Work Programme for 2010-2013<sup>8</sup>, yet affirms that PCD will be promoted through a range of policy instruments, *including agriculture, trade, fisheries, climate change, environment and research*. The reform of the Common Agricultural Policy and the Common Fisheries Policy are mentioned as policy processes that will ‘*continue*

<sup>7</sup> Note that the food security policy framework was part of the same basket of policy commitments as the EU Development Spring Package of 2010 that also included the PCD Work Programme 2010-2013.

<sup>8</sup> The Commission issued the FSPF one month before the PCD Work Programme for 2010-2013 was presented.

to take into account global food security objectives'. Finally, an ambitious conclusion of the Doha Development Agenda is believed to strengthen the international trade system to the benefit of global food security.

## 4.2. EU Resilience Policy Framework

In May 2013, the Council endorsed its conclusions on the Commission's proposal for an '*EU Approach to resilience: learning from food security crises*'. Complementing EU emergency responses, the new policy's aim is to help **tackle the root causes of recurrent crises**, rather than just addressing their, more costly, consequences. In this sense, resilience building is presented as a fundamental aspect of poverty reduction efforts by working through different angles, most notably food security, climate change adaptation and disaster risk reduction.

Building on the recent experiences with massive food crises in the Sahel region and the Horn of Africa, the new approach aims to improve the EU's support to disaster-prone and vulnerable populations. Although building on experiences with food insecurity in sub-Saharan Africa, the proposed approach consists of three general key components that allow it to be applicable to other regions and other types of vulnerability (e.g. floods, droughts, earthquakes, food price increase etc.): i) anticipating crises by assessing risks; ii) focusing on prevention and preparedness; iii) enhancing crisis response.

Whereas key elements from the policy framework for resilience have been incorporated into the Implementation Plan for Food and Nutrition Security, a separate Action Plan on Resilience has been presented by the European Commission in June 2013, which has been welcomed by the European Parliament in September 2013.<sup>9</sup>

## 4.3. EU Nutrition Policy Framework

Adopted in May 2013, together with the Resilience Communication, the EC's Communication on nutrition, entitled '*Enhancing Maternal and Child Nutrition in external assistance: an EU policy framework*' was drafted jointly by DG Development Cooperation (DEVCO) and DG Humanitarian Aid and Civil Protection (ECHO). Both the consequences and the root causes of undernutrition will be addressed, targeting nutrition-specific development interventions at creating the right conditions during the '*crucial window of opportunity of the first 1000 days between conception and two years of age*.' Also, a Staff Working Document accompanied the Communication on Undernutrition in Emergencies, which outlines basic principles and lessons of best practice regarding humanitarian responses to nutrition challenges.

The communication indicates that EU actions to improve nutrition will particularly address issues of rural development, sustainable agriculture, public health, water and sanitation, social protection and education. With the overall aim of reducing mortality, morbidity, as well as growth and development deficiencies due to undernutrition, the Nutrition Policy Framework (NPF) defines the following two specific objectives:

1. Reduce the number of children under five years of age who are **stunted** (low height for age), in line with the Commission's commitment at the 2012 London Global Hunger Event to support

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<sup>9</sup> <http://www.europarl.europa.eu/sides/getDoc.do?type=COMPARL&reference=PE-516.686&format=PDF&language=EN&secondRef=01>

partner countries in their efforts to reduce the number of stunted children under five by at least 7 million by 2025.

2. Reduce the number of children under five years of age who are **wasted** (low weight for height). The Commission specifies that the EU will contribute to the global target of the World Health Assembly (WHA) of 2012 to reduce and maintain the number of wasted children to less than 5% worldwide.

In terms of strategic priorities to reach these commitments, the Commission outlines that the focus will be on i) mobilising political commitment through political dialogue and advocacy; ii) scaling up nutrition efforts at country level, in line with priorities of partner countries; and iii) strengthening the knowledge –base and technical expertise on nutrition through applied research and the development of information system. Related to the latter priority-area, the communication puts considerable emphasis on accountability through the development of tools that track investments and methodology to monitor and measure nutrition impacts of associated development policies.

At the core of the EU's approach to nutrition is the understanding that the various determinants of undernutrition are interlinked and therefore tackling the issue requires a **multi-sector response**, "*combining sustainable agriculture, rural development, food and nutrition security, public health, water and sanitation, social protection and education*" (EC, 2013b). Regarding EU non-development policies however, the communication only stresses the need to strengthen existing linkages between humanitarian and development actors, for example through joint vulnerability assessments and operational planning. No reference is made to commitments made to existing PCD commitments or to other EU policies with a potential relevance to nutrition in developing countries.

#### 4.4. EU Implementation Plan for Food and Nutrition Security

In May 2013, European Development Ministers at the Foreign Affairs Council endorsed a long awaited EU Food and Nutrition Security Implementation Plan. The Implementation Plan (IP), entitled '*Boosting food and nutrition security through EU action: implementing our commitments*', is the Commission's tardy response to an invitation from the Council to design an implementation framework to better coordinate EU and Member States' policies and programmes in the area of food and nutrition security.

As such, the Plan is perceived as the **operational closing piece** of the EU's long-term policy response to the international food crisis evoked by soaring food prices in 2007/08. It complements more direct humanitarian-development approaches such as the €1 billion EU Food Facility and EU-led multi-stakeholder instruments like the AGIR and SHARE initiatives in the Sahel and the Horn of Africa respectively<sup>10</sup>. As a framework to guide EU-wide action against hunger and malnutrition, the IP could potentially also serve as a useful tool to inform and help target EU policy coherence for food security.

The formulation of the implementation plan has proved to be a cumbersome process. Following the adoption of the food security framework in 2010 discussed in Section 4.1, the council requested the Commission to develop an Implementation Plan, yet for a long time little progress was made. Whereas the Commission presented a draft implementation plan for the FSPF in May 2011 at an EU experts meeting on agriculture (Heads of Agriculture and Rural Development: HARDs), it took over two years since the

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<sup>10</sup> For the Global Alliance for Resilience Initiative (AGIR), see: [http://ec.europa.eu/echo/policies/resilience/agir\\_en.htm](http://ec.europa.eu/echo/policies/resilience/agir_en.htm). For the Supporting the Horn of Africa's Resilience initiative, see: [http://ec.europa.eu/echo/policies/resilience/share\\_en.htm](http://ec.europa.eu/echo/policies/resilience/share_en.htm).

Council's request before the Member States could come to an agreement. A number of policy shifts, such as the Agenda for Change to modernize EU development cooperation and a new focus on food and nutrition security meant that successive draft implementation plans needed updating. Speculations about the reasons for the unusual delay in endorsement also point to a lack of political drive from the Member States. Whatever the reasons of the delay, the adoption of the IP is considered a milestone on the long road to a more concerted EU-wide approach to addressing global food insecurity and malnutrition.

In order to improve the **Coherence, Complementarity and Coordination** (the “3 C’s”) of EU and Member States’ cooperation, the Plan is based on a “three-pronged” approach centred on:

1. Enhancing political and policy dialogue on food and nutrition security with partner countries, regional and global organisations and other stakeholders like civil society and the private sector.
2. Enhancing EU and Member States’ programmes, incl. implementing joint programmes where feasible, and including, but not restricted to, countries where joint programming is currently being carried out.
3. Identifying interventions for Europe and its Member States, jointly or according to the Code of Conduct on Division of Labour, to contribute to global, regional and national efforts in combatting food and nutrition insecurity.

**Content-wise**, the stated aim of the IP is to define an operational response for the EU to deliver on policy commitments made in the three aforementioned communications on food security (Section 4.1), resilience (Section 4.2) and nutrition (Section 4.3), of which the latter two were endorsed simultaneously with the IP in May 2013. Distilled from these commitments, the IP puts forward six policy priorities reflecting agreed EU and Member States’ policy commitments in the area of food and nutrition security..

1. Improve smallholder resilience and rural livelihoods
2. Support effective governance
3. Support regional agriculture and food and nutrition security policies
4. Strengthen social protection mechanisms, particularly for vulnerable populations
5. Enhance nutrition, in particular for mothers, infants and children
6. Enhance coordination between development and humanitarian actors to build resilience and promote sustainable food and nutrition security

**The IP is a reporting and communicating commitment** and improvements across the above six priority areas will be presented in a joint report to the Council on a biennial basis from 2014 onwards and ending in 2020. In order to better serve these reporting purposes, a scorecard is foreseen with relevant performance criteria per policy priority. These criteria are formulated in a broad manner and are generic by nature, (e.g. *‘number and value of relevant programmes supported in X countries or at international level’*), as to allow for each Member State and the EU to tell its own story. Ideally, this should allow for reliable, regular information on EU and Member States’ efforts and *‘ensure accountability to policy commitments and further advance the aid effectiveness agenda in concrete terms’*.

**The IP refers to PCD in a rather ambiguous way.** Despite the stated intention for the IP to foster improvements in coherence, complementarity and coordination and the recognition that Policy Coherence for Development affects food and nutrition security outcomes, it is indicated that PCD is reported against in parallel processes. The performance criteria therefore relate to development assistance and communication efforts (advocacy and dialogues) only, with the exception of one that reads *‘policy coherence improved as documented in relevant reports’*. Hence, instead of presenting a comprehensive

EU agenda to promote international food and nutrition security, it focuses on a small part of the picture, leaving aside the specifics of influential non-development policies.

#### 4.5. What these frameworks and tools bring for PCD efforts

The EU has made great efforts to define its approach to global food security. This currently results in a set of communications, council conclusions and EP resolutions, providing ample details on the EU objectives, principles and approaches regarding food security. The recent Food and Nutrition Security Implementation Plan specifies how this is to be operationalized in the period 2014-2020.

The overarching nature of the implementation plan, which brings together food security, resilience and nutrition concerns, implies that its 6 policy priorities can guide all global food security efforts in the coming years of the EU institutions and its member states. The fact that these food security objectives are now clearly spelled out is a valuable and far-from-evident accomplishment, given the complex EU decision-making processes.

Focussing exclusively on development assistance and dialogues with third countries, leaving out the specifics on other, non-development, policies, is a missed opportunity however. Labelling PCD as a '**parallel process**' does not fit the need for a comprehensive approach that maximizes synergies between development and non-development policies.<sup>11</sup>

While this section examined how future PCD initiatives can be shaped by recent communications on global food and nutrition security, the next section looks back to assess past efforts to promote, or protect, food security in third countries through non-development EU policy-making processes.

## 5. Aligning different agendas: living up to commitments?

Whereas all six of the sub-areas outlined in table 1<sup>12</sup> are relevant and necessary to enhance policy coherence for food security, this section of the paper focuses on a selection of four key EU policies where recent or on-going policy reforms could have a significant impact on food security. As such, they offer an interesting and timely opportunity for analysis in view of the PCD Work Programme review. The four selected policies are the Common Agricultural Policy (CAP), the EU Common Commercial Policy (i.e. trade policy), the Renewable Energy Directive (RED) and the Common Fisheries Policy (CFP).

It is not within the scope of this paper to assess the potential impact of these respective policies on food security in developing countries, nor is it our intention to offer specific suggestions to make them more development-friendly. The aim of this section is to discuss how concerns for global food security have been addressed throughout the different stages of the policy-making process, focussing in particular on the use of institutional mechanisms designed for PCD promotion.

<sup>11</sup> Keijzer and King have pointed out in this regard that it is better to integrate the monitoring of effects on developing countries in existing monitoring processes as opposed to parallel structures as these would imply a mere secondary consideration. (Keijzer, 2012).

<sup>12</sup> For the reader's convenience: agricultural policy, trade, research & development and innovation, biodiversity, land use and the impact of bioenergy production and fisheries policy.

## 5.1. The Common Agricultural Policy

The Common Agricultural Policy (CAP) is the agriculture policy of the EU. It aims to safeguard farmers' incomes, to ensure a stable, safe and affordable food supply to European consumers, and to support the provision of public goods such as the environment. The CAP budget is funded by the European Commission and accounts for roughly 41% of the EU's budget for 2013, but will decline to 36% in 2020.<sup>13</sup> It consists of two pillars. Pillar 1 manages direct payments to farmers and market management measures. Pillar 2 requires co-financing from the Member States and funds the development of rural areas.

As the **world's largest importer, and the second largest exporter of agricultural commodities** (EC, 2013c), the EU's agricultural policies and instruments have a significant effect on world food prices and agricultural development in developing countries. Traditionally, the CAP has been subject to criticism from development stakeholders, particularly directed at the market distorting effects of its domestic support and trade measures. Whereas successive reforms since 1992 have considerably reduced such negative spillovers, the CAP remains one of the priorities for PCD work for food security.

### Box 2 PCD Work Program 2010-2013 targets for agriculture

#### Targets

- To prepare a post-2013 CAP reform taking into account food security and development objectives in a balanced manner.
- To propose EU initiatives in the field of agricultural product quality policy taking into account development objectives.

#### Indicators

- Communication on post-2013 CAP reform considers impact on development objectives.
- Development objectives are taken into account in preparing impact assessment for agricultural product quality policy initiatives.

**The CAP's potential effects on food security** in developing countries are multiple and vary across and within countries, depending on production and consumption patterns, dependence on food imports, trade and other domestic policies and whether a population group is primarily consumer or producer and living in an urban or rural area. Impacts also change as countries change due to (sub-) urbanisation, migration, etc. A listing of the broad types of effects different policy measures under the Agriculture policy can have is provided in Annex I.

**The CAP reform process** started in April 2010 and concluded in a political agreement on 26 June 2013. It was the first CAP reform applying the new ordinary procedure under the Lisbon Treaty, giving the European Parliament co-decision powers in the political decision-making on the overhaul of the policy. Content-wise, discussions focussed on how ambitious a new policy-package would be on diminishing direct payments, putting an end to quotas and export subsidies and making farmers more environmentally accountable for the funds received. Discussions turned out to be more cumbersome than was initially anticipated and developed alongside equally cumbersome budget negotiations on a new Multiannual Financial Framework (MFF) for the period 2014-2020. Due to the delay, many of the policies under the new CAP will not be implemented before 2015.

- To kick off the CAP reform, the Commission invited all interested EU citizens and stakeholder organisations for a three-month **public debate** on the future of the CAP, its objectives and its

<sup>13</sup> <http://register.consilium.europa.eu/pdf/en/13/st12/st12602.en13.pdf>

raison d'être. Concluded with a conference in July 2010, an inclusive public debate this early in the reflection process was to provide input to policy-makers and inform their preparatory work for the subsequent decision-making process. While the public debate was restricted to EU views, the summary report does indicate that several European stakeholders represented developing countries' interests and concerns (EC, 2010c). From the over 5500 submissions received, the Commission distilled twelve future directions for the CAP that are believed to enjoy the support of a broad range of contributors. Among those twelve future directions for the CAP, the following two catch the eye. "The EU should i) ensure that the CAP guarantees *food security for the EU*, using a number of tools to achieve this aim", while ii) avoid damaging the economies or food production capacities of developing countries; *help in the fight against world hunger*".

- Based on the outcomes of the public debate, the Commission presented in November 2010 its **Communication on "The CAP towards 2020"**, which outlined the options for the future CAP (EC, 2010d). Here again, increasing EU food production in order to guarantee long-term EU food security, while contributing to world food demand features as one of the three main strategic aims for the CAP post-2013.<sup>14</sup>

Arguably triggered by food price surges in 2007/2008, European and global food security became a rather odd but pervasive argument for those calling for the protection of EU agriculture. Such a rationale raises questions about the validity of food security concerns in the EU and the most appropriate policy measures to address European and global food security. Not only does evidence show that food security is not endangered in the EU (Zahrnt, 2011. And Blandford et al. 2011), the bulk of CAP policy measures as proposed in the communication focus on maintaining EU production capacity and providing domestic (income) support through decoupled direct payments rather than on stabilising food markets while market access conditions into the EU remain untouched. As such, the CAP does not evidently help in the fight against world hunger. In fact, the policy tools used to promote EU production are controversial with regards to their impact on the stability of world prices, the price advantage they convey to European producers, and the limitation on market access that are used to insulate the European market from outside competition. A wide range of research and actors would argue that the goals of promoting European food security, as currently undertaken, and global food security, are not necessarily mutually supportive.

More fundamentally, the proposed **CAP approach to contributing to world food security**, i.e. increasing EU production, goes against the rationale of the Commission's approach to food security as formulated in the March 2010 communication on a EU Food Security Policy Framework, which focuses on supporting smallholder farmers and rural livelihoods. De facto reducing food security to European food self-sufficiency and stressing the role the CAP can play to fulfil global food demand, the communication focuses on direct payments to maintain and increase production levels. Whereas the Communication thus indeed fulfils its obligation as stipulated in the PCD Work Programme to 'take into account food security and development objectives', it does so in a way that undermines its very own development narrative on food security. In an overview of stakeholder views on the CAP-reform, Klavert and Keijzer hence note that food security as a term has been taken over by protectionist lobbyists as 'a new label for an old justification: Europe's agriculture is not viable without the CAP and its direct payments' (Klavert and Keijzer, 2012).

<sup>14</sup> The other two challenges the CAP should respond to are environment and climate change, and territorial balance. (EC, 2010d).

- Next in the reform process, a formal **stakeholder consultation** took place between November 2010 and January 2011. Aim of the consultation was to further explore the broad reform options outlined in the Communication and in particular to provide information and knowledge on the expected effects of each respective policy scenario and the associated changes to the CAP instruments. Stakeholders were invited to ‘provide factual, analytical contributions that will complement other sources of information in assessing the impacts of policy reform’. From the around 450 contributions received however, none came from developing countries.
- A more institutionalised way of stakeholder consultation finds place in DG AGRI’s **Advisory Group on International Aspects of Agriculture**, which involves among others representatives from development NGO’s and Civil Society Organisations. However, the Advisory Group’s capacity to deal with the CAP reform’s implications for developing countries is limited since meetings are organised on the invitation of the EC who also sets the agenda. As such, the Group meets rather irregularly and discussions focus on agricultural trade relations with third countries. The CAP’s overall reform process did not feature as a topic for discussion, let alone its implications for global food security.
- On 12 October 2011 the Commission presented its **legal proposals** for the CAP 2014-2020. Based on the aforementioned Communication, addressing world food demand by an increased EU agricultural production through domestic support remains at the heart of the policy proposal. Yet, by justifying the maintenance of farm subsidies as a measure to feed the world, the CAP not only contradicts its own narrative on development cooperation for enhanced food security as argued earlier, it actively limits incentives and chances for agricultural development in developing countries. This has been stressed by the UN’s Special Rapporteur on the Right to Food (UNSRRF) who described the CAP as *“a 50 billion euro contradiction of the EU’s commitment to help put developing world agriculture back on its feet, and [which] will remain so under today’s reform plans”*.<sup>15</sup>
- The **Impact Assessment** (IA) accompanying the legal proposals reaffirms the CAP’s contested approach to mitigating food insecurity. Notably, the IA finds domestic farm subsidies compatible with EU efforts to support a sustainable agro-food sector in developing countries and even notes the EU Food Security Policy Framework in a footnote as the reference framework for EU priorities in food security, which the CAP is to promote and support. Strangely, Annex 12 of the IA, drafted by DG DEVCO on ‘The Common Agricultural Policy and Development Cooperation’ does somehow recognise the inherent tension between on the one hand harnessing the growth potential of small farmers and small agricultural enterprises in developing countries, while on the other hand contributing to global food security by remaining an important supplier of high quality and safe agricultural and food products in a growing world market. While implicitly recognising this tension, Annex 12 does in no way elaborate whether the reform proposals at hand offer a right balance between the two.

While the EC’s proposals for a CAP reform indeed pay **lip service to the concept of PCD** and global food security, they abuse both terms to support a specific narrative that is both in spirit and in approach incoherent with the EU’s commitments to food security as a global development challenge. Although ‘food security’ thus played a central role in the CAP reform, the global implications of the concept have de facto not been taken into account adequately and the usage of various institutional mechanisms for PCD promotion could not alter such misinterpretation.

<sup>15</sup> <http://www.srfood.org/en/cap-reform-must-put-an-end-to-dumping-un-expert>

- The EC's legal proposals signalled the beginning of a second, **political phase of the reform process**. One in which the European Parliament and the Council work toward a consensus decision. While environmental concerns, transparency issues and direct payment schemes dominated the discussions in the run up to the institutional positioning for the triologue negotiations, development stakeholders focused their efforts on ensuring that the CAP would 'do no harm' to food security and overall economic growth in developing countries.

Despite the many complexities associated with tracking the impact of CAP measures on developing countries, strong calls were uttered by the European Parliament's Development Committee (DEVE), as well as by non-governmental actors and EU Member States to look into options for a systematic **monitoring of how the CAP affects developing countries** (Keijzer and King, 2012).<sup>16</sup>

- Indeed, in the run up to the Parliaments plenary vote on the CAP reform, the **EP's Development Committee (DEVE)** voted unanimously in favour of a mechanism to monitor and assess the CAP's development impacts in order to ensure that CAP regulations would "*not jeopardize the food production capacity and long term food security of developing countries, in particular least developed countries (LDCs), and contribute to achieving the Union's commitments on mitigating climate change*". In particular the proposed amendments, made to the proposal on financing, management and monitoring of the CAP, suggested i) to integrate the CAP into the EU's broader framework for PCD and measure its external impact; ii) to phase out export subsidies entirely; iii) to address the EU's dependence on protein crop imports; and iv) completely decouple direct payments from production. Regarding the monitoring mechanism, DEVE proposed regular, independent assessments focussing on the impact on local and smallholder producers (in line with the Food Security Policy Framework) while building on evidence submitted by a variety of stakeholders, including farmers' organisations, local governments and civil society organisations. It would be up to the Commission to define the scope and procedure of these impact assessments and to submit an annual report to both the EP and the Council to share results, evidence and the EU's policy response (EP DEVE, 2012).
- In late January 2013, members of the **EP's Agriculture Committee (COMAGRI)** gavelled through some 100 amendments, distilled from more than 7500 original amendments to the Commission's 2011 proposal, including those submitted by the other EP Committees.<sup>17</sup> The outcome however was a weakening of the Commission's proposals for a transition toward a more sustainable EU agro-food system. Despite a call from UNSRRF De Schutter on MEPs to support DEVE's amendment for a monitoring system, COMAGRI rejected them all in January<sup>18</sup>. DEVE's amendments were again submitted and subsequently rejected in the EP's plenary vote in March, closing the final window for development-proofing the CAP.<sup>19</sup> At Council level, the other co-legislator, development and global food security concerns never properly entered the debates for a common position.<sup>20</sup>

<sup>16</sup> For an overview of stakeholder's proposals for impact assessment as well as complaint mechanisms, see [http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2012/120254/LDM\\_BRI\(2012\)120254\\_REV1\\_EN.pdf](http://www.europarl.europa.eu/RegData/bibliotheque/briefing/2012/120254/LDM_BRI(2012)120254_REV1_EN.pdf)

<sup>17</sup> <http://www.europolitics.info/sectorial-policies/agri-wraps-up-work-on-compromise-amendments-art346514-11.html>

<sup>18</sup> [http://www.euractiv.com/cap/un-official-cap-consider-global-news-517127?goback=.gde\\_3695216\\_member\\_207473820-.UQlhADltaOI.twitter](http://www.euractiv.com/cap/un-official-cap-consider-global-news-517127?goback=.gde_3695216_member_207473820-.UQlhADltaOI.twitter)

<sup>19</sup> <http://www.ecdpm-talkingpoints.org/final-window-for-development-proofing-the-cap/>

<sup>20</sup> Despite efforts by the Netherlands to raise the issue in the Agriculture and Fisheries Council. <http://register.consilium.europa.eu/pdf/en/11/st08/st08880.en11.pdf>. All concerns regarding the impact of the CAP on food security were shushed with the promise that the consequences for developing countries would be

**This critical analysis of the reform process** shows that development concerns were indeed present at the technical preparatory stage of the policy process, yet disappeared early on in the political decision-making procedure. In general, development interests have not been granted much attention in the CAP reform, partly because the most obvious negative effects of dumping through export subsidies are largely gone.<sup>21</sup> Nonetheless, given the EU's global weight in agro-food trade and the CAP as a tip of the spear for EU PCD action for food security, the reform has not delivered on its commitments under the PCD Work Program and continues to hamper agricultural development in developing countries.<sup>22</sup>

- Although the mobilisation of diverse interest groups during the public debate and the stakeholder consultation is a positive evolution, it is clear that **stakeholder involvement and advisory structures are biased** toward participants with a direct interest, being the agro- and food-manufacturing producers and European consumers, while participation from developing countries is not envisaged. Improving the representativeness of these structures should help flagging development concerns at this stage (Klavert, 2012,19).
- Whereas the **concept of food security** indeed features at the heart of the reform's threefold objective, it does so in a way that is at odds with both the global narrative on the right to adequate food in the context of national food security, as well as with the EU's own Food Security Policy Framework. The FSPF's approach to food security should be the guiding narrative in how other policy areas, including the CAP, go about the concept and can use it as a justification for its policy measures.
- Finally, the principal **rejection to monitor the CAP's impact** on food security in developing countries contradicts the Council's May 2012 request for 'a more evidence-based approach to improve monitoring, implementation and follow-up of PCD action'.<sup>23</sup> Despite indications of potential impacts in the ex-ante impact assessment accompanying the legislative proposals, no efforts are suggested to follow-up on them.

## 5.2. The Common Fisheries Policy

**The EU's Common Fisheries Policy (CFP)** seeks to manage who can fish what and how much. EU waters are a shared resource with equal access for all EU MS so the predominant part of the legislative measures under the CFP are aimed at addressing overfishing while ensuring a profitable fish industry and social security for EU fishing communities. Other parts of the CFP concern the management of EU markets in fishing products, the EU aquaculture industry and the 'external dimension' of the CFP.

More than a quarter of the total fish caught by EU fishing vessels is caught outside EU waters. The **CFP's external dimension** thus concerns EU access to maritime resources whose management lies beyond EU jurisdiction and applies to a small external fleet of little over 700 EU vessels operating elsewhere in the world.<sup>24</sup> This includes operations on the high seas as well as on the territorial waters, or Exclusive Economic Zones (EEZ), of third parties, mainly developing countries. Whereas this concerns a very

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analysed in the impact assessments accompanying the legislative proposals on the CAP after 2013.[http://www.consilium.europa.eu/ueDocs/cms\\_Data/docs/pressData/en/agricult/121551.pdf](http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/agricult/121551.pdf)

<sup>21</sup> For an analysis of development interests in the CAP reform, see Matthews, A. 2013. <http://capreform.eu/the-development-interest-in-the-cap-reform-debate/>

<sup>22</sup> For an overview of key sources of incoherencies of the CAP regarding global food security, see: Concord, 2013. [http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/EN/foraff/130225.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/EN/foraff/130225.pdf)

<sup>24</sup> Estimates from 2008 identified a list of 718 EC vessels as being potentially included within the scope of the external fleet, of which 59% fly the flag of Spain, 14% the flag of France, and 10% the flag of Portugal (EC, 2008).

marginal share (0,82%) of the total EU fishing fleet, the vessels of the external fleet are significantly larger and more powerful than their counterparts of the internal fleet, to such an extent that external catches contribute to 21% of the total EU catches for human consumption (EC, 2008).

Fisheries policy is an exclusive EU competence so it is the European Commission who negotiates and regulates **EU external fishing access**. The EC does so through a combination of existing institutions and own management instruments.

- i) **Bilateral Fisheries Partnership Agreements (FPA)** grant EU MS access to a share of third party's, often (West-African) developing countries, surplus stock in exchange for financial and/or technical support. As such, FPA's are in part aimed at contributing to the development of a well-governed sustainable fishing practice in the partner country.
- ii) **Bilateral 'northern' agreements**, i.e. the joint management of shared stocks with Norway, Finland and the Faroe Islands.
- iii) **Regional Fisheries Management Organizations (RFMO)** who bring together a group of countries in order to organize fishing activity in certain areas of the high seas. EU officials negotiate access rights in RFMOs where European fishers are active.

While these agreements establish the legal, economic and environmental framework for EU fishing activities outside EU waters, it is estimated that **over half of the EU's external fleet operates outside such governing frameworks** and instead works through privately negotiated agreements, joint ventures or under non-EU flag. Fisheries Agreements therefore cover less than 0.5% of the activities of the total EU fleet, while fish caught under FPAs account for approximately 3-4% of total fish supplies to the EU market.<sup>25</sup> The EU's capacity to monitor the behavior of these vessels on their compliance against CFP legislation is limited at best, since strictly speaking there is no obligation for MS to inform the EC of such extra-FPA arrangements by ship-owners operating under their respective flags.<sup>26</sup> In addition, some parts of the high seas are not properly or not at all covered by RFMOs. In sum, the large majority of the EU external fleet operates in "troubled waters" where it is ultimately up to the doubtful capacity of a developing country to put in place adequate Monitoring, Control and Surveillance (MCS) systems to regulate EU access and sustainable fishing practices (Keijzer, 2011).

Moreover, even when operating through an FPA, the responsible operating of EU fishing vessels hinges predominantly on whether or not an **adequate domestic governance framework** is in place, either at the coastal state level or at the level of the RFMOs. Vice versa, in coastal countries that have established a good regulatory framework, the operating of a Distant Water Fleet (DWF) pose less of a threat, regardless of the framework they operate through: FPAs, private agreements or joint ventures. This is a rather concerning finding as many of the countries with which the EU has signed an FPA are fragile or failed states, evoking questions about their capacity to govern their waters or implement supportive measures through an FPA (Tindall, 2010).

Apart from the EU's external role in safeguarding the principles of sustainable and responsible fisheries internationally, several elements within the **CFP's internal dimension** are of particular relevance in view of

<sup>25</sup> Declaration of the ACP-EU Joint Parliamentary Assembly. The reform of European Fisheries and its impact on ACP countries. [http://www.europarl.europa.eu/meetdocs/2009\\_2014/documents/acp/dv/897/897617/897617en.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/acp/dv/897/897617/897617en.pdf)

<sup>26</sup> The 2009 Green Paper launching the stakeholder consultations prior to the CFP-reform notes in this respect that "Fisheries control has generally been weak, penalties are not dissuasive and inspections not frequent enough to encourage compliance. Moreover, no checks have been built into the system to ensure that, for example, Member States only access Community funding if they fulfill their basic control and conservation responsibilities" (EC, 2009).

the policy's impact on food security and the overall development of the fisheries sector in developing countries.

- The EU is by far the **largest single market for fish and fishery products** in the world. Due to growing consumption and declining domestic catches, the EU's dependence on imports for its fish consumption is growing and increasingly exceeds domestic supply. EU fish imports increased 10% between 2009 and 2010, representing about 26% of world fish imports (excluding intra-European Union trade). These trends often force the EU to source its fish supply from areas where sustainable exploitation cannot be guaranteed, threatening the future availability of fish (species) in these waters (FAO, 2012: p. 72). The Group of African Caribbean and Pacific countries (ACP) estimates that around 10% of EU fish imports come from ACP countries, representing 68% of ACP countries' total fish exports.<sup>27</sup>
- The EU fisheries sector is characterized by **low economic resilience and heavy subsidies**. Apart from direct aid through the European Fisheries Fund (EFF) and comparable national support schemes, the fishing industry enjoys several indirect subsidies like fuel tax exemptions while, unlike other industries, it does not have to pay public management costs associated with its activities. In several MS, the estimated costs of fishing have therefore exceeded the total value of catches (EC, 2009). Through its direct and indirect support measures, the EU keeps fishermen on board that would otherwise may have left the industry. While overcapacity is a key driver of overfishing, EU operators are considered to benefit from subsidies that grant them an unfair competitive advantage toward local fishing communities.
- Due to subsequent enlargement rounds, the EU now has a number of countries without direct access to EU waters and have actively lobbied for more support to in-land aquaculture. While open sea aquaculture remains the dominant approach, in-land aquaculture suffers from the same problems in the sense that larger amounts of fresh fish need to be harvested to feed the farmed fish which tend to be predominantly carnivorous. Finally, EU livestock also requires feed inputs that are derived from fish flour, and hence add to the EU's demand for fish (Keijzer, 2011).

For developing countries, fishing often constitutes **an intrinsic part of the livelihoods of coastal communities** while part-time fishing activities provide an important contribution to the food security of mainly agricultural households.<sup>28</sup> From a nutrition point of view, fish products are the primary source of protein for up to nearly 25% of people in low-income and food-deficit countries.<sup>29</sup> As a major player on the global fish trade market, as well as through its external fleet, the EU and its CFP has a considerable impact on the food security and the overall development of fishing industries in coastal developing countries.

**The PCD Work Programme 2010-2013** acknowledges this impact as it notes that "*the intended post-2013 reform of the Common Fisheries Policy, especially its external dimension (Fisheries Partnership Agreements) is an important initiative which is expected to have an impact on developing countries, especially with regard to the sustainability aspect of the exploitation of sea resources*" (EC, 2010b: p. 24).

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<sup>27</sup> Ibid.

<sup>28</sup> <http://www.odi.org.uk/sites/odi.org.uk/files/odi-assets/publications-opinion-files/2837.pdf>

<sup>29</sup> [http://www.seafish.org/media/publications/SeafishSummary\\_FAOSOFIARpt2012.pdf](http://www.seafish.org/media/publications/SeafishSummary_FAOSOFIARpt2012.pdf)

**Box 3 PCD Work Program 2010-2013 targets for fisheries****Target**

- To adopt a reform of the post-2013 Common Fisheries Policy which takes into account development objectives.

**Indicator**

- Proposals for post-2013 Common Fisheries Policy are based on an Impact Assessment, including an assessment of the impact on developing countries.

**The CFS reform process** started in April 2009 with a Green Paper, which analysed the shortcomings of the former policy and identified five structural failings, which the reform was to tackle if the EU were to future-proof its fisheries sector.<sup>30</sup>

- **The Green Paper launched a public consultation** that lasted until May 2010. A total of 382 contributions were received, including 117 from the fishing industry and some 63 by NGOs (including development NGO's). Among the eleven third countries that submitted a contribution, the ACP Group was the only one from a developing country perspective. The EC issued an overview of the contributions in a synthesis report, which was presented at a large conference organized in Madrid on 2-3 May 2010. With regards to the external dimension of the CFP, the report noted that, "*many see the importance of aligning the principles of the CFP and work on FPA closer with other policies, to ensure coherence and synergies with Economic Partnership Agreements (EPA), trade agreements, development aid and support to local development*". Also, concerning the implementation of FPAs, "*several stakeholders, especially NGO, propose replacing FPA by a fisheries governance framework or sustainable sourcing agreements*". Regarding the key objectives of the new CFP, it is worth noting that some MS suggested fisheries for food supply and (EU) food security as a new objective (EC, 2010e).
- Following this long period of multi-stakeholders consultation, the College of Commissioners adopted a **package of policy proposals on 13 July 2011**. For the first time since the Lisbon Treaty, the MS and the European Parliament engaged in a 'co-decision' procedure to jointly agree on a future Common Fisheries Policy.
- **Two draft impact assessments** accompanied the reform proposals. One on the 'Basic Regulation' on the CFP, and one on the 'Market Regulation' for a Common Organisation of the Market in Fishery and Aquaculture Products. First drafts of both IAs, submitted in December 2010, were considered inadequate by the Impact Assessment Board and had to be revised. Regarding the Basic Regulation, the IA Board identified four areas of concern that required further work, one of which was the analysis of the external aspects of the CFP. In particular, the Board Opinion demanded a more thorough assessment of the problems in implementing FPAs, notably "those related to surplus stocks, EU funding and payments for fishing rights that are eventually not used". Also, the revised IA should "clarify the relative importance of the FPAs for the EU fisheries sector"<sup>31</sup>.

<sup>30</sup> The five structural failings identified are i) a deep-rooted problem of fleet overcapacity; ii) imprecise policy objectives resulting in insufficient guidance for decisions and implementation; iii) a decision-making system that encourages a short-term focus; iv) a framework that does not give sufficient responsibility to the industry; v) a lack of political will to ensure compliance and poor compliance by the industry (EC 2009).

<sup>31</sup> Other, more technical recommendations were made but were transmitted to DG MARE directly and were expected to be incorporated in the revised IA of the Basic Regulation.  
[http://ec.europa.eu/fisheries/reform/opinion\\_basic\\_en.pdf](http://ec.europa.eu/fisheries/reform/opinion_basic_en.pdf)

- **Both IAs were revised and resubmitted to the IA Board** in February 2011 and again the board assessed that both would benefit from further improvements, including on the CFP's external dimension and the aforementioned implementation issues associated with FPAs. Whereas this time no revision was demanded, the Board Opinion makes it clear that, although FPA implementation issues were discussed in annex 12 of the second draft, they were inadequately used in the main text and thus in the analysis of the possible reform options that subsequently informed the proposed regulations (EC, 2011b).<sup>32</sup>
- **The final Impact Assessment accompanying the Basic Regulation** included a narrative listing of significant shortcomings associated with both FPAs and RFMO's. Regarding the latter, a lack of compliance and control is acknowledged to have undermined the role of RFMOs in fisheries management and has driven some of the main players like the EU, to complement multilateral actions with unilateral ones. However, the IA also recognizes that *"the responsibility for compliance and control lies ultimately with flag states which may be unwilling (the issue with flags of convenience) or unable (lack of capacity, especially in developing States) to properly control their fleets and ensure compliance with RFMO Conservation Measures"* (EC, 2011c: p. 23).

By providing only an overview of shortcomings and perceived challenges associated with the current status quo of the external dimension, the IA fails to effectively report on the potential impacts of the suggested reform options for the future. In other words, the IA makes no mention of EU external fishing activities outside the regulatory framework of an FPA or RFMO, while the implications of any changes in the implementation and management of FPAs are left unaddressed as well.

- The **EC's Communication on the CFP's External Dimension** was adopted alongside the Regulations and submitted to the EP and the Council on 14 July 2011. It suggests transforming FPAs *"into Sustainable Fisheries Agreements (SFAs) focusing on resource conservation and environmental sustainability, improved governance and effectiveness of sectoral support"*. Whereas all efforts to make bilateral fisheries agreements more sustainable are indeed laudable, making FPAs stricter could incentivize more EU fishers to operate outside FPAs. While the Commission's proposal aims to better align the CFP's internal and external dimension, it only includes articles on bilateral agreements and on RFMOs, neglecting EU fishing interests from private agreements, joint ventures and other forms of investment. A likely increase in extra-FPA activity would therefore result in the de facto deregulation of the CFP's external dimension as joint ventures and private agreements are effectively excluded from both the impact assessment, as well as from the Basic Regulation itself (Keijzer, 2011).
- The **EP's DEVE Committee** addressed precisely this issue, among other things, in its reading of the Basic Regulation in June 2012 and unanimously proposed several amendments to make the CFP more consistent with the Union's *development* policy, as well as to better regulate EU fishing activities outside the regulatory framework of a FPA or RFMO:
  - *"No Union fishing vessels shall operate in a third country with which the Union has concluded a Sustainable Fisheries Agreement outside the provisions of that Agreement"*.
  - *"Effort shall be made at Union level to monitor the activities of Union fishing vessels that operate in non- Union waters outside the framework of sustainable fisheries agreements. Such vessels should respect the same guiding principles that are applied to those fishing in the Union"*.<sup>33</sup>

<sup>32</sup> Both the eventual IA's, as well as the IA Board's opinions can be consulted here: [http://ec.europa.eu/fisheries/reform/impact\\_assessments\\_en.htm](http://ec.europa.eu/fisheries/reform/impact_assessments_en.htm)

<sup>33</sup> <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A7-2013-0008&language=EN> - title4

- After the **EP's Fisheries Committee** (PECH) voted on the CFP in December 2012, in what was praised by environmental stakeholders as a milestone vote for sustainable fisheries, the **European Parliament** voted on the Basic Regulation in plenary on 6 February 2013. A large majority reaffirmed PECH's draft report on the Basic Regulation, setting a strict deadline to end overfishing by 2015, while further strengthening the discard ban.

In addition to the amendments proposed by PECH, the plenary also approved DEVE's amendment regarding the monitoring and compliance of external fleets operating outside a regulatory framework. In particular, member states will be required to collect information on private agreements between ship-owners flying their flag and third country governments. Previously, no such data was available, despite such obligations under the 2008 Council regulations to prevent, deter and eliminate illegal, unreported and unregulated fishing.<sup>34</sup>

- **At the level of the European Council**, EU Ministers for Agriculture and Fisheries adopted conclusions on the EC's Communication on the CFP's External Dimension in March 2012. The conclusions stress the need to apply the same principles and standards for sustainable fisheries management for the external dimension as the ones applied in EU waters, yet they fail to do so for EU fishers operating outside bilateral, regional or multilateral agreements.<sup>35</sup> The Council's 'general approach' to the Basic Regulation, only fully adopted on 27 February 2013, did not change this limited approach to the CFP's external dimension.<sup>36</sup>
- **Trilogue negotiations on the Basic Regulation between the Council and the EP** started on 19 March 2013 and concluded on 30 May, resulting in a consolidated text that can be assessed from a development and food security point of view as a considerable improvement compared to the previous legislation. Whereas both the discard ban and the 2015 cap on overfishing were somewhat softened with exceptions and regionalized plans, the main provisions regarding the monitoring and regulating of EU vessels in non-EU waters outside the SFA framework were maintained. Also, the EC will be required to arrange for independent ex-ante, as well as ex-post evaluations of each protocol to a SFA before negotiating a successor agreement.
- However, both the Council and the EP are still to fully form an opinion on the € 6,5 billion **European Maritime and Fisheries Fund (EMFF)**<sup>37</sup>, which allocates the subsidies to fisheries, proposed by the EC in December 2011. According to environmental stakeholders, 'following the money' will be the true test of how ambitious the CFP reform will really be.<sup>38</sup> A partial general approach by the Council, adopted in October 2012, accepted a compromise package enabling funds for fleet renewal. In June 2013, members of the PECH Committee voted in favor of a plan that would reintroduce subsidies to build new fishing vessels and modernize the EU fleet. This contradicts the rules and spirit of the new Basic Regulation as investments in new boats and equipment, rather than in data collection, control and enforcement, are likely to result in further overfishing. A plenary vote on the proposed report on 23 October 2013 will show in how far EU support the ambitious reform of the Basic Regulation.

<sup>34</sup> "Member States shall obtain information on any arrangements between nationals of a Member State and a third country that allow fishing vessels flying the flag of that Member State to engage in fishing activities in waters under the jurisdiction or sovereignty of the third country, as well as details of the vessels concerned and their relevant activities. The Member State shall inform the Commission". See <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:286:0001:0032:EN:PDF>

<sup>35</sup> [http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/agricult/129052.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/agricult/129052.pdf)

<sup>36</sup> <http://register.consilium.europa.eu/pdf/en/11/st12/st12514.en11.pdf>

<sup>37</sup> Replacing the European Fisheries Fund (EFF).

<sup>38</sup> [http://www.wwf.eu/what\\_we\\_do/fisheries/cfp\\_reform/?210793/WWF-Fish-Campaign-Newsletter---October-2013](http://www.wwf.eu/what_we_do/fisheries/cfp_reform/?210793/WWF-Fish-Campaign-Newsletter---October-2013)

**A critical analysis of the reform process** shows that, while never at the center of the CFP reform, development concerns, as well as coherency issues featured throughout the entire policy reform process, from stakeholder consultation to trilogue negotiations.

- **In spite of various contributions to the public consultation** on the CFP reform calling for better governance outside EU waters and deploring the poor accountability mechanisms in place for commercial fisheries in many developing countries, the Impact Assessment of the Basic Regulation failed repeatedly to look into the potential implications of a CFP reform that is likely to push more EU operators outside its negotiated regulatory frameworks.
- **The limited scope of the CFP's external dimension** (Part VII of the final compromise text) displays a limited interpretation of the concept of PCD. Focussing exclusively on the Union's international obligations and EU vessels operating outside EU waters, the external dimension of the CFP excludes relevant linkages with measures under the internal dimension that are likely to have an impact (e.g. subsidies for fleet renewal), albeit more opaque, on fisheries and food security in developing countries. Despite a statement in Part VII that *"the provisions of this Part shall be without prejudice to specific provisions adopted under Article 218 TFEU"*, the limited interpretation of the external dimension goes against the CFP's new principle of good governance, notably on *"coherence between the internal and external dimension of the Common Fisheries Policy"*.<sup>39</sup>

### 5.3. The Renewable Energy Directive

The EU's Renewable Energy Directive (RED) was adopted in 2009 and aims to achieve specified, **mandatory targets for the use of renewable fuels and the reduction of greenhouse gas (GHG) emissions by 2020**.<sup>40</sup> The RED introduced a 20% target for the overall share of renewable energy consumption (from wind, solar, hydro-electric and tidal energy, as well as geothermal energy and biomass) and a sub-target of 10% share for renewable energy for the transport sector in particular.

A companion directive, the **Fuel Quality Directive (FQD)** introduced a mandatory target to achieve by 2020 a 6% reduction in GHG intensity of fuels used for transport.

The **contribution from biofuels** to reach these targets is limited, yet for the sub-targets in the transport sector they are expected to be the dominant contributors. Various policy instruments under the RED, ranging from fuel tax exemptions for biofuel producers over trade measures (e.g. import tariffs), blending mandates<sup>41</sup> to incentives for better and more efficient supply and marketing chains, have incentivized the consumption of biofuels to the extent that, according to the Renewable Energy Projections, biofuels will represent around 9% of total EU energy consumption for transport purposes by 2020 (EEA, 2011: p. 17).<sup>42</sup>

<sup>39</sup> Basic Regulation on the CFP (as endorsed by the Coreper meeting of 14 June and submitted for consideration to the PECH meeting of 18 June). [http://cfp-reformwatch.eu/wp-content/uploads/2013/06/2013-06-14\\_Basic\\_regulation\\_on\\_the\\_CFP\\_final\\_compromise\\_text.pdf](http://cfp-reformwatch.eu/wp-content/uploads/2013/06/2013-06-14_Basic_regulation_on_the_CFP_final_compromise_text.pdf)

<sup>40</sup> The Directive is part of a broader legislative dossier, the EU Climate and Energy Package (2008) setting out the so-called "20-20-20" targets: i) a 20% reduction in EU GHG-emissions compared to 1990 levels; ii) a 20% target for the share of renewable energy in overall EU energy consumption (RED); and iii) a 20% increase in EU energy efficiency. [http://ec.europa.eu/clima/policies/package/index\\_en.htm](http://ec.europa.eu/clima/policies/package/index_en.htm)

<sup>41</sup> Obligations to blend fixed proportions of biofuels with fossil fuels.

<sup>42</sup> A previous EU Directive "on the promotion of the use of biofuels or other renewable fuels for transport" set the goal of reaching a 5,75% share of renewable energy in transport in 2010.

The EU biofuel support framework has been controversial, both for its questioned accounting of indirect emissions due to land use change and for the impact of expanding biofuel mandates on global food prices. According to the High Level Panel of Experts on Food Security and Nutrition, which acts as the science-policy interface of the UN Committee on World Food Security (CFS), the EU biofuel policy **triggered a globalized market in biofuels and biofuels feedstock, based on developing country agriculture** (HLPE, 2013: p. 30). Indeed, while being only a minor consumer of bioethanol, the EU is a major biodiesel consumer. With a global consumption share of 56% in 2011 and 46% of global production, the EU market accounts for almost 90% of global biodiesel trade. Although most of the biofuels consumed in the EU are also produced in the EU from raw materials originating from the EU<sup>43</sup>, its targets on renewable energy cannot be fully met using only domestic biomass (Diop, et al. 2013: p. 24-27). Argentina, Indonesia and Malaysia are presently the main biodiesel exporters to the EU and while imports from African countries have so far been insignificant, the continent has become a dominant focus of biofuel investments and is therefore likely to play an increasing role in global biofuels trade.

The bulk of biofuels consumption in the EU, as well as globally, is dominated by **food-based, first generation biofuels**, derived from sugar and starch crops (ethanol) and oilseed crops (biodiesel).<sup>44</sup> From the very outset, researchers and stakeholders hence warned that EU biofuels policy with mandatory blending targets would contribute significantly to a shift in demand for agricultural products, leading to a substantial increase and volatility in agricultural market prices and increased competition for, and pressure on, land. Public policies stimulating biofuels production thus play at the heart of interlinked global challenges such as energy, land, water, food and climate change. A listing of associated effects of biofuels on global food security is provided in Annex 2.

Given their many relevant effects, both negative and positive, on all four dimensions of food security (availability, access, utilization and stability)<sup>45</sup>, European development and environmental stakeholders have in the past couple of years targeted the biofuels support regulations and the RED in particular, as the **main stage for PCD action for global food security**. The Commission's PCD Work Programme 2010-2013 however, focuses on land issues and large-scale foreign investments in agricultural land, without linking back to the policies that incentivise them and that are being targeted by NGOs.

#### Box 4 PCD Work Program 2010-2013 targets for land and impact of bio energy production

##### Target

- To progress towards greater security of access to land and of land tenure to protect vulnerable groups.

##### Indicator

- Agreement at EU level on principles for responsible investments in agricultural land (2010).

The only reference to the **RED in the PCD Work Programme** regarding food security concerns the Commission's obligation to include in its biennial Renewable Energy Progress Reports the economic, environmental and social impacts of the RED as stipulated under article 17 on the policy's sustainability

<sup>43</sup> 83% of biodiesel and 80% of bioethanol consumed in the EU was also produced in the EU in 2010. 60% of feedstock for biodiesel and 79% for bioethanol consumed in the EU are grown EU-domestically, (EC, 2013d).

<sup>44</sup> Second generation biofuels (not widely commercialized yet) use biomass from non-food sources like lignocellulosic feedstocks and waste matter from food crops or residues. Third generation biofuels are made from algal biomass.

<sup>45</sup> Depending on a wide variety of factors ranging from the sort of feedstock used, natural resources involved, the processing technologies used and the comparative efficiencies in terms of yields, costs and reduction of GHG emissions, biofuel have differing effects on the environmental and social context in which they are produced.

criteria.<sup>46</sup> Indeed, the Directive sets out a series of mandatory sustainability criteria with which biofuels need to comply in order to be accounted toward national targets. These criteria are aimed at preventing the conversion of areas of high biodiversity or carbon stock for the production of raw materials for biofuels, while enforcing minimum GHG emission reductions for biofuels used on the EU market.<sup>47</sup>

On top of the sustainability criteria, the RED includes **monitoring and reporting provisions on the economic, environmental and social impact of EU biofuels consumption**. Besides measures to safeguard minimum GHG emission savings and soil conservation, the EC is thus required to report on the RED's impact "on social sustainability *in the Community and in third countries of increased demand for biofuel*". This includes "*the impact of Community biofuel policy on the availability of foodstuffs at affordable prices in particular for people living in developing countries, and wider development issues*". These reports further address the aspect of land-use rights and monitor whether a selection of conventions on biodiversity and labour rights are ratified and implemented in the EU as well as in countries providing raw material for biofuels consumed in the EU.

However laudable these intentions, it is clear that the EC's reporting on EU biofuels' economic, environmental and social impact is **hampered by evidence gaps and scientific constraints**. Whether suffering from a science too premature to enforce policy adaptation or hiding behind a lack of data as some NGOs claim, the EU recognises the evidence-gap on:

- **EU Biofuels impact regarding land use rights.** While recognizing the possible negative impacts on land use rights, the EU Renewable Energy Progress report points out that it is simply too soon to draw assumptions about the link between EU biofuels policies and land acquisitions since the lead time between land purchase and biofuels production is at least 3-5 years. Even though companies have referred to the RED as part of their investment argumentation, the report states there is insufficient information to connect biofuels-oriented projects to an increased and subsidized demand from the EU market. (EC, 2013d).
- **EU Biofuels impact on food prices.** Despite better data and analytic improvements, estimates regarding crop and commodity price increases due to biofuels production remain sensitive to the modelling framework used and its underlying assumptions. Nonetheless, the EC's 2013 renewable energy progress report acknowledges that the pressure exerted on global food markets is likely to drop in case of a decrease in consumption of food-based biofuels (EC, 2013d). However, against the broader context of other relevant determinants affecting global food prices, research commissioned by the EC does not acknowledge a direct link between the biofuel production and local food price increases (ECOFYS et al., 2012).
- **Land use impacts and GHG savings.** Member States' progress reports provide little evidence of the impact of increased biofuels production on land use patterns in the EU. Research for the

<sup>46</sup> Under Climate Change as one of the five target areas for enhanced PCD action, the RED is discussed in more detail, yet here as well efforts focus on assessing the overall impacts of the RED under article 17.

<sup>47</sup> In particular, the EU requires that biofuels achieve a minimum GHG emission saving threshold of at least 35% compared to fossil fuels' emissions in order for biofuels consumed in the EU to receive financial support, to be counted toward the renewable energy obligations or toward the mandatory national energy targets. That threshold was to increase to 50% from 2017 onward and to 60% in 2018 for production installations launched after 1 January 2017. Producers serving the EU biofuels market need to comply with these criteria, either through national MS legislation transposed from a EU sustainability scheme, or by joining one of the fourteen voluntary schemes recognized by the European Commission. However, the EC's progress report reveals that the transposition and implementation of the sustainability criteria in many MS is still not complete or correct. See <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0102:FIN:EN:PDF>

European Commission, as well as by third parties however suggested that indirect land-use change (ILUC), implying that pristine land is tilled to replace the food crops that were diverted elsewhere to biofuels production, significantly reduce the potential GHG savings from biofuels.<sup>48</sup> Here as well, different models working under different assumptions result in a variety of findings. Despite these uncertainties, there is an overwhelming body of scientific research that confirms strong evidence that ILUC emissions, while crop-specific, are in some cases so significant they could shift biofuels effects on climate change from positive to negative.<sup>49</sup> As early as December 2010, the EC adopted a report on ILUC. The report concluded that despite the limitations associated with available modelling methods, there was sufficient evidence that ILUC emissions reduce the savings associated with first-generation biofuels to such an extent that it is recommendable to address it, albeit in a precautionary approach, as a flaw in the current legislation.

In October 2012, the European Commission issued its **proposals to amend the RED and the FQD** in order to limit land use change for food-based biofuel production, while raising the minimum emission savings threshold for biofuels consumed in the EU. The 'not perfect' proposal, in the words of Climate Commissioner Connie Hedegaard, was jointly presented by DG Energy and DG Climate after almost two years of internal analysis and discussion, informed by a series of external studies.

- The EC's proposals suggest a **5% blending cap for food-crop based biofuels**, the 2011 average consumption level for the EU in general, yet already exceeded by some MS. The proposal explains the cap as a means to limit ILUC emissions and the accompanying memo addresses the link between food and feed prices and an increased biofuels production, noting that any "*increased use of land increases the competition for the resources that we get from our land areas*" and that "*under the new rules, the growth in biofuels in the EU should come from feedstock that are not in competition with food crops, thus minimising these impacts.*"<sup>50</sup>
- An **elevation of the minimum GHG savings threshold in the FQD** to 60% for biofuels produced in installations operational after July 2014. For installations operational before that time, the 35% threshold remains valid until December 2017, after which it is elevated to 50%. The amendment thus does not affect the short-term expectations of the industry.
- The overall 10% target for renewable fuels in transport and the 6% carbon reduction remain unchanged in the FQD so the Commission's proposal foresees measures to encourage greater market penetration of non-food based biofuels through an **incentive scheme increasing the weighting of advanced biofuels** toward the 10% target for transport. As such, the proposal sets out different 'ILUC factors' for different crop groups. Biofuels that require land will get an ILUC factor. Waste, residues and algae for second and third generation biofuels will not.
- Prior to the official launch of the EC's proposals, a draft version was leaked to Reuters in September 2013. Following an intense lobbying campaign by the biofuels industry, the official proposal dropped binding ILUC factors to be counted toward the FQD's 6% carbon reduction. Under the new rules, MS and fuel suppliers are obliged to include the estimated emissions from

<sup>48</sup> Raw materials for biofuels production may be produced on land directly converted from another status (e.g. deforestation). Carbon emissions from such land use change are not included in the RED's requirements for the minimum GHG emission savings threshold, yet could amount to higher levels than those of the fossil fuels they replace.

<sup>49</sup> For an overview of scientific research from various sources on ILUC and GHG emission calculations for biofuels, see: <http://www.transportenvironment.org/what-we-do/what-science-says-0>

<sup>50</sup> [http://europa.eu/rapid/press-release\\_MEMO-12-787\\_en.htm](http://europa.eu/rapid/press-release_MEMO-12-787_en.htm)

**ILUC in the reporting on GHG savings**, but is not taken into account when it comes to calculating the FQD's 6% GHG decrease target. Also, the Commission is required to report by 2017, based on the latest available scientific evidence, on the effectiveness of the measures proposed to limit the GHG emissions due to land use change associated with biofuels production. If deemed appropriate such a review should include a legal proposal to introduce ILUC-factors in the mandatory sustainability schemes as of 2021.

Since the EC is proposing to simply amend existing directives and is not introducing entirely new legislation, there has been no official opportunity for stakeholder consultations or public comment. The EU biofuels dossier and the proposed amendments however evoked a vivid debate before, during and after the launch of the proposals. As such, the policy process was subject to **intense lobbying** on behalf of the biofuels industry, striving against a cap on first generation biofuels in order to protect investments.

Environmental advocates and biofuel industry stakeholders engaged in vigorous debates on the **scientific rigour** around key issues in the dossier, like the amount of EU subsidies for biofuels support<sup>51</sup>, the effect of EU biofuels policies on global food prices<sup>52</sup> and the monitoring of ILUC emissions<sup>53</sup>. Concerning the latter issue of assessing ILUC impacts, the scientific community recognises considerable uncertainties and both policy-makers as well as scientists are divided on the function for ILUC factors to play in the new policy. Strong enough to justify a U-turn in policy focus according to the one, too uncertain for legislation for the other, the introduction of ILUC factors has divided both researchers and policy makers regarding the way forward with the EC's proposal.<sup>54</sup>

As a result, there is somewhat of a **contradiction** between the proposals' recognition of ILUC as a problem and its simultaneous weakness in providing measures to tackle it, as ILUC factors were downplayed to reporting items only and would therefore not influence whether or not certain biofuels meet the minimum GHG saving requirement.

The **European Parliament** was deeply divided in its voting on both Directives in September 2013. The result was a tentative victory for environmentalists in the sense that ILUC factors were reintroduced for accounting in the FQD from 2020 onwards, yet the cap level for food-based biofuels increased to 6%, instead of 5. Reflective of the strong split in opinions was the narrow vote against starting negotiations with the European Council.

On the side of the **European Council**, a similar split is apparent as MS who have already exceeded the 5 or 6% share of food-based biofuels are likely to oppose a proposal that limits the extent to which these biofuels can contribute to the overall target. A first discussion in March 2013 showed that most MS are also sceptical on the evidence base for ILUC impacts. So far only the Netherlands, the United Kingdom, Denmark and Belgium have expressed support for an ILUC-based accounting model, while others unofficially question whether EU biofuels demand actually drives food price increases or incentivizes land conversion.

Regardless of the aforementioned split between 'believers' and 'non-believers', the biofuels file offers considerable **challenges from a PCD for food security perspective**:

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<sup>51</sup> <http://www.euractiv.com/science-policymaking/biofuels-subsidies-overestimated-news-529929>

<sup>52</sup> <http://www.euractiv.com/energy/eu-report-brussels-biofuels-poli-news-530293>

<sup>53</sup> <http://www.euractiv.com/energy/biofuels-honesty-eye-beholder-analysis-530311>

<sup>54</sup> <http://www.euractiv.com/energy/biofuels-industry-sent-mails-hou-news-519531>

- In absence of official public or stakeholder consultations, **inter-service consultations** within the Commission constituted the main forum to promote PCD and food security interests. Although it is hard to assess in how far DG DEVCO's voice was heard in these discussions, it didn't help that a study '*Assessing the impact of biofuels production on developing countries from the point of view of Policy Coherence for Development*' (Diop, D., et al., 2013), commissioned by DEVCO did not inform these consultations. In terms of timing, the request for tendering was issued too late for the study to be used during DEVCO's meetings with DG Energy & Climate Change in the run up to the RED and FQD reforms and in terms of content the study fails to link the impact of biofuels in developing countries to EU policy measures. On a side note, the fact that Development Commissioner Andris Piebalgs was Energy Commissioner at the time the RED was designed, has led some observers to question whether this might have complicated a strong case for development issues.
- All in all, the **cap on first generation biofuels is a clear message** to investors that policy support for conventional biofuels is something of the past. However, the cap is set at current production levels instead of prohibiting the use of food crops for EU fuel altogether. While food security concerns have not been the main driver to amend the Directives, the EC recognizes the effect of its policies on food prices, yet shies away from setting a more ambitious cap.
- Also, the **practical relevance of the cap on food-based biofuels** will depend upon the interaction between the RED and the FQD mechanisms. Intra-EU biofuels trade could be a way for MS with production levels already exceeding the 5/6% cap to sell or transfer their surplus biofuels to MS lagging behind in reaching the RED targets. However, the FQD target of 6% GHG reduction in transport remains valid and is likely to incentivize higher volumes of (conventional) biofuels production in all MS. Reaching the FQD target will prove very challenging without dramatic increases in usage of advanced biofuels and observers anticipate that first-generation biofuels production will actually overshoot the RED's cap-level because of the FQD target. In order to make the RED's cap meaningful, a similar cap on food-based biofuels would have to be introduced in the FQD (Kretschmer and Baldock, 2013).
- Discussions on ILUC and the scientific evidence required to justify policy adaptation, cut to the core of more fundamental concerns regarding the **need for knowledge-based development- and climate-proofing** of EU policy-making. 'Independent' research has served both sides in the discussions on ILUC factors, and the limitations in the modelling are broadly acknowledged. Opponents of ILUC inclusion therefore argue that the evidence-base is too uncertain for legislation, claiming ILUC would label certain biofuels "guilty until proven innocent". Others noted that many EU policies are based on uncertain modelling and that, even in lack of conclusive proof, the EU is meant to follow the precautionary principle in implementing policies with a potentially harmful effect on the environment, let alone on global food security.

#### 5.4. The Trade Policy

The EU Common Commercial Policy can have considerable bearing on food security in developing countries, as worldwide the EU is a major actor in agricultural trade, both in terms of imports and exports. This is recognised in the EU PCD Work Programme and the EU Food Security Policy Framework (Box 5).

**Box 5 Extract from the EU Food Security Policy Framework on the role of trade**

“International trade can substantially contribute to food availability by increasing the amount and by broadening the variety of food on the market. Food availability can also be enhanced by regional integration of agricultural and food markets, facilitating trade flows from surplus to deficit areas. The EU and its Member States should support standardisation and harmonisation of policies, rules and regulations, towards regionally integrated agricultural policies. Moreover, the EU and its Member States acknowledge that given food security concerns, whether at a national or regional level, developing countries can make use of existing trade policy space, including through border measures. The objective should be to aim at a sustainable agri-food chain.”

“The EU and its Member States should contribute to improved food market functioning at global, regional and national levels.”

A wide variety of recent and ongoing EU trade-related initiatives are relevant in this context. First, one could mention the EU’s positioning in **multilateral trade negotiations** at the WTO, particularly the stalled Doha Development Round. The handling of tariff and non-tariff barriers to trade in agricultural goods is among the contentious issues in the negotiations, alongside disagreement on the level of tolerance toward agricultural support. Second, the EU negotiates and concludes **bilateral free trade agreements** with individual and groupings of countries. Well-known examples are the Economic Partnership Agreements (EPAs) that the EU negotiates with African, Caribbean and Pacific states. Other relevant examples are ongoing negotiations with MERCOSUR, the United States and India, to name just a few. Third, **unilateral EU trade schemes** matter, such as the Generalised System of Preferences (GSP), whose recently revised version will come into force in January 2014.

In these trade agreements and schemes, the handling of tariff and non-tariff barriers to trade in agricultural goods is often among the contentious issues in the negotiations. Views diverge often between the negotiators on provisions that can be expected to affect food security, like:

- the tariff rates for agricultural products from the EU to enter developing countries’ markets and vice versa;
- the degree of tariff escalation;
- uptake of a special food security safeguard clause allowing trading parties to take protective measures in case of unpredictable developments that threaten food security;
- amount of EU development assistance to level the playing field, i.e. ensure the private sector in developing countries can seize export opportunities provided by the FTA and can compete with EU agri-businesses on the domestic market, and meet EU private and public standards. This latter point only applies to EPAs, since these are the only FTAs to include provisions on development assistance.
- dealing with the potentially distortive support the EU provides to its farmers.

As for the outcomes of the negotiations, civil society often argues that the EU through its trade policy disincentives agricultural development in poor countries by favouring subsidised EU agricultural produce to enter developing country markets and forcing developing countries (non LDCs) in the role of commodity provider due to increasing tariffs higher up the value-chain. The European Commission on the contrary, for example in its communication on Trade, Growth and Development published in 2012, highlights successful steps taken to further coherence of trade policies with development objectives, like the inclusion of a food security safeguard clause in the EU – CARIFORUM EPA. Clearly, results are mixed. In line with the previous sections, this section does not serve to assess how “food-security friendly” the EU Commercial

Policy is in practice, but rather to identify elements in the EU trade policy-making process that arguably affect the capacity of the EU to take global food security objectives into account.

- There is a need to step up **monitoring and evaluation efforts** as perceptions of stakeholders differ and the impact of trade measures is complex and diversified. It is far from straightforward to determine how trade policies affect food security, given diversity across and within countries. Furthermore, beliefs of the implication of specific trade measures differ. Some are firm believers of trade liberalisation while others are convinced there is a need for protective measures. Therefore, even if consensus exists on the need to seek coherence between trade and global food security objectives, contradicting views and unclarity prevails as to what this entails. This can be partly addressed by stepping up monitoring and evaluation efforts, which shed light on the likely (ex-ante) and actual (ex-post) impact of trade policies. It should be kept in mind though that the ruling development paradigm (e.g. free trade or protectionist) might influence the choice of indicators to monitor. Valuable ex-ante monitoring tools specific to EU trade agreements, first conducted in 1999, are 'Sustainable Impact Assessments' (SIA), which examine the economic, social and environmental implications of trade negotiations. However, civil society has noted that in many cases SIAs are finalised only after the conclusion of the negotiations. They also flagged that while SIAs may usefully point to potential negative impacts of the trade agreement and recommend adjustment measures, specificities lack on who will follow up on these recommendations.<sup>55</sup> The European Parliament, in recognition of the need to broaden the evidence-based to inform trade policy and the FSPF priority of improving smallholder resilience and rural livelihoods, has called for *“regular and independent assessments and evaluations of the EU's agricultural and trade policies, paying special attention to impacts on local and smallholder producers, and building on evidence submitted by governments, farmers' organisations, civil society organisations and other stakeholders in developing countries which are EU trading partners”*.<sup>56</sup>
- The EU has not been **upfront about the balance of commercial interests and development objectives** in the case of the EPAs. Since 2002, the EU is engaged in EPA negotiations with African, Caribbean and Pacific states, which has resulted so far in 36 countries having signed or initiated an (interim) EPA. With the exception of 15 Caribbean states, all are still engaged in tough negotiations with the EU towards final regional EPAs. From the outset the EU has stressed that it was not driven by economic interests but instead considered the EPAs to be primarily development tools. However, in the negotiations the EU insisted on high tariff cuts, while showing little flexibility to address ACP concerns. The fact that the EU did not reveal its commercial interest from the outside, but instead pretended to be only concerned with development, has been a cause of frustration and political tension. More transparency about the balance between economic interests and development objectives, including global food security, could resolve and help avoid strained relations.<sup>57</sup>
- The **leverage of policy-makers beyond trade experts** is limited and could be strengthened. Regular inter-departmental coordination mechanisms such as inter-service consultations are applied to trade policy-making, while DG Trade remains in the lead. If agreements like the EPAs, are genuinely meant to be tools for trade *and* development, some argue that a more considerable role could usefully be assigned to DG Development Cooperation, by having it co-lead EPA negotiations on the European side. Similar reasoning can be applied to the task division within the European Parliament, where the Trade Committee spearheads the parliament's EPA scrutiny role, rather than

<sup>55</sup> Concord PCD Spotlight report (2011).

<sup>56</sup> EUROPEAN PARLIAMENT RESOLUTION on the EU 2011 Report on Policy Coherence for Development (2012/2063(INI))

<sup>57</sup> For more details about the EPA negotiations, see Ramdoo and Bilal (2013).

a sharing of tasks on an equal footing with the Development Committee.<sup>58</sup> Furthermore, with the entry into force of the Lisbon Treaty in 2009, the High Representative for Foreign Affairs and Security Policy and her newly established European External Action Service are expected to ensure coherence of the EU's external policies. So far, they have been rather silent on trade policies, while they could be instrumental in strengthening thinking and efforts to link-up trade, development and other external relations with developing countries, both at headquarter and EU delegation level.

- The EU PCD Programme 2010 - 2013 recognises that trade can provide a major contribution to food security. However, it **does not present any targets nor indicators**. Concrete targets and indicators on trade (particularly in the area of trade negotiations, market access, international labour and environmental standards, as well as International Property Rights) are presented under the more general Trade and Finance section of the work programme, which contains no single reference to food security. This lack of clarity on PCD aspirations in the area of trade and food security hinders progress and reduces accountability.<sup>59</sup> There is thus a merit to sharpen PCD target setting in follow up of the PCD Work Programme 2010-2013.

## 6. Conclusions and recommendations for PCD objectives on food security to gain traction

The EU has made **repetitive commitments** in its treaties that it shall take account of the objectives of development cooperation in the politics it implements which are likely to affect developing countries. While it is the only region in the world with a legally binding commitment, the recognition of the importance of PCD is in tune with the international development discourse, as reflected in the Busan Partnership for Effective Development Cooperation and the ongoing discussion on a post-2015 global development framework.

With a recently adopted Implementation Plan, the EU has made significant steps to define a common EU-wide approach to global food and nutrition security. Focusing its efforts on a clear set of six policy priorities - centered around smallholder farming, effective governance, regional approaches, social protection mechanisms, nutrition interventions and resilience-building – the EU displays **a sound understanding** of the underlying trends that cause hunger crises and wide-spread malnutrition. Since these priorities constitute the focus areas in the EU's development work on food security, they should inform and spur the PCD efforts of the EU and its member states toward banning world hunger.

An analysis of EU policy-making processes related to agriculture, fisheries, energy and trade in previous sections shows that **some tangible efforts** have indeed been made to strengthen policy coherence 'for food security'. For example, the reform of the Common Fisheries Policy will strengthen the monitoring and regulation of European vessels operating in non-EU waters outside the framework of SFAs and RFMOs. The amendment of the Renewable Energy Directive is proposed to introduce a blending cap for food-crop based biofuels. However, these are tentative steps and the policy-processes show that other concerns and interests dominate the debates and shape the outcomes, while global food security considerations play a

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<sup>58</sup> Negre (2013).

<sup>59</sup> Concrete targets and indicators on trade (particularly in the area of trade negotiations, market access, international labour and environmental standards, as well as International Property Rights) are presented under the more general Trade and Finance section of the PCD Work Programme 2010-2013. No reference to food security is made in this section.

very marginal to no role, or the food security rationale used is at odds with the logic of the EU's own food security policy framework.

While living up to PCD commitments in the end is a matter of political decision-making, institutional mechanisms can play a key role in securing that relevant concerns are taken into account throughout the policy-making process. This paper identified **a number of fundamental shortcomings** in the (use of) PCD tools such as the PCD Work Programme, impact assessments and inter-sectorial coordination. On this basis, the following suggestions can be made to further strengthen the EU's PCD efforts, particularly in the area of food security:

### **1. Strengthen linkages between the development cooperation and PCD agenda on food security**

The 2010 EU Food Security Policy Framework is the agenda for the EU and its member states to address global food security challenges, which concerns both development assistance and PCD efforts, as is also reiterated in the Food and Nutrition Security Implementation Plan, adopted in 2013. However, although the implementation plan explicitly aims to foster improvements in coherence, complementarity and coordination, its performance criteria relate primarily to development assistance and dialogues. As noted earlier, PCD is labeled as a 'parallel process'. Vice versa, the PCD Work Programme 2010-2013 fails to clearly link with the objectives laid down in the Food Security Policy Framework, like fostering smallholder farming. In moving forward, there is a need for a genuinely comprehensive approach that maximizes synergies between development and non-development policies. An early opportunity is the formulation of a new PCD Work Programme, the food security section of which could particularly target non-development policy measures impacting on the EU's 6 global food security priorities. Furthermore, dialogues with third countries on EU development assistance programming for the period 2014 – 2020 could be used to also discuss non-development policies.

### **2. Set clear PCD food security objectives, targets and indicators to better guide policy-making and monitor progress**

While the PCD Work Programme 2010 – 2013 contains operational targets and indicators, it is unclear to which objectives these should contribute. Furthermore, the majority of targets and indicators are of a general nature and lack adequate specification in terms of baseline data, time-dimension and quantitative measurability. Targets along the lines of *"a post-2013 CAP reform taking into account food security and development objectives in a balanced manner"* do not provide adequate instructions for PCD action and simply restate a legal treaty obligation regarding the requirement for Impact Assessments. It was noted that in the area of trade for food security specifically, targets and indicators are entirely absent. The formulation of a next PCD Work Programme merits clearer PCD objectives, targets and indicators to serve as a more useful guide for PCD efforts and would allow for better progress tracking.

The current work programme seems to have served primarily as a base document for the biennial PCD reporting rather than as a tool for policy-makers in EU institutions and EU member states' administrations to get familiarised with and respect the EU's development commitments. For a next PCD work programme to prove its worth, it is needed for the Commission and the Member States to promote its use and application more strongly beyond the development community. Finally, it is worth noting that clear targets and useful indicators can only be derived from clear objectives,

which are defined at the political level. In this sense, a straightforward and feasible PCD work programme will be one of the determinants of whether the EU will take its legal and political commitments on PCD seriously.

### **3. Broaden the evidence-base of PCD impacts on food security objectives**

It is widely recognised that there is a need for a more evidence-based approach to PCD, as also stressed by EU Development Ministers in their May 2012 FAC meeting. The exclusion in the CAP reform of a system to monitor and evaluate the external impact of the CAP contradicts these Council conclusions. On the other hand, DEVCO's intention to increase the number of independent ex-post studies on the impact of policies, building on the experience with the biofuels impact study, is welcome. Complementary measures by independent researchers with a more academic approach, as well as continued funding for civil society - in Europe and in developing countries - could further enrich the, often quite sterile, debates on PCD and EU policy impacts. Given the complexity of the exercise, MSs like Finland and the Netherlands, as well as the Commission have expressed intentions to support initiatives that contribute to a more knowledge-based approach in terms of assessing the impact of different EU policies on the food security system in a given partner country. Data and evidence on the impacts of EU policies on food security are essential to inform policy debates.

### **4. Give more political weight to development and food security objectives through institutional fine-tuning and PCD standard setting across different policy areas.**

It was noted in many cases that food security and broader development issues are raised at the early phases of policy-making, but disappear in the higher-level political stages of the decision-making process. While it is inevitable that at this higher-level more trade-offs are made and many objectives are reconciled, it needs to be ensured that food security and development concerns are indeed *part* of the agenda of those taking the final decisions. Looking at the EU's toolbox for PCD promotion, it is apparent that most institutional mechanisms are limited to the first phase in policy-making, i.e. the preparation of legislative proposals. When policy processes reach the political level, mechanisms to promote PCD in the EP and the Council are more limited in number and strength, and much depends on how their respective development bodies promote development interests.

In this context, it was stated that if EPAs are genuinely meant to be tools for trade *and* development, a more considerable role could have been assigned to the Development Commissioner and his staff. In the same spirit, an opportunity to embed PCD at a higher political level is to explicitly assign a more considerable role for promoting PCD to the new President of the Commission and the Council taking office in 2014.

### **5. Commission DGs should provide adequate resources to independently analyse the impact of policy options on developing countries**

In line with the Treaty obligation on PCD, the Commission President could instruct its Secretariat General to require Commission DGs to provide for adequate resources to independently analyse the potential effects of EU policy options on developing countries. DG DEVCO should not be left with the 'burden of proof', doing the impact assessments for other DG's policy options. The Impact

Assessment Board could be tasked to safeguard the quality of these assessments, possibly drawing on DG DEVCO for technical support in this regard.

After over 20 years of legal and policy commitments as well as political rhetoric, this paper lays out why it is necessary for the EU to get realistic about PCD at the political level in the area of food security. While many of the considerations noted in this paper are of a technical nature, the four policy processes discussed show there is a real need for political sponsorship and leadership on PCD as related to food security. Without such strong political drive, there is a distinct lack of scope to promote genuine change toward a more development-friendly EU policy-making and 'success stories' will remain small and anecdotal.

If the EU were to keep failing to deliver on its self-imposed PCD commitments, the lack of progress is likely to undermine its credibility. As such, the EU would benefit from a more genuine approach. This would mean either to follow through on its commitments, which would require the investment of significant political capital – or alternatively lower political ambitions and accept the consequences of this. While it would perhaps be naïve to expect a 'step change' from the EU given the interests at play, greater progress is needed for credibility to be maintained.

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## Annex I. The CAP and food security

- **Coupled payments** are granted to farmers if they produce a specific commodity associated to the direct payment. As such, their aim is to promote the production of particular commodities by making the profitability of their production dependent not only on their market price, but also on the associated amount of direct payment. Coupled payments thus encourage EU production, and may lead to overproduction, bringing down world food prices. Reducing them would benefit exports and therefore farmers' income in many developing countries.
- **Decoupled or direct payments** remove the link between a direct payment and the production figures of a specific commodity and are therefore believed not to influence production decisions. Decoupling was introduced in the 2003 reform of the CAP and continued in the 2009 'Health Check' in order to move away from the market-distorting effects associated with promoted production, giving EU farmers the freedom to produce according to market demand. Whereas decoupled payments are indeed less trade distorting, they still form an incentive for non-competitive farmers to stay in the industry, thus maintaining artificial levels of production and land use for farming.
- **Rural development payments** serve three objectives: i) improving the competitiveness of the farming and forestry sectors, ii) enhancing the environment and the countryside and iii) improving the quality of life in rural areas. Rural development measures are co-financed and every MS, or an area within them, can choose from a menu of measures to include in their designated programs. Greening measures that effectively reduce Green House Gas (GHG) emissions will benefit agricultural development in developing countries by mitigating the effects of climate change. Depending on whether payments for rural development provide additional income based on measures farmers would have taken anyhow, rather than changing their behaviour to the benefit of the environment, payments can give EU farmers a competitive advantage that harms their counterparts in developing countries.
- **Export subsidies** are calculated to make up the difference between EU prices and lower world market prices. They however also provide a financial incentive for the export of particular EU products, hence promote their (over) production, which reduces world market prices for those commodities. Whereas producers and exporters in developing countries would benefit from a reduction in EU export subsidies, higher food prices could harm some consumer groups in developing countries. Currently, the EU spends less than 0,5% of the agriculture budget on export subsidies (EC, 2012: p. 26). The remaining subsidies mainly go to dairy products.
- **Import tariffs** refer to those tariffs paid by countries when exporting to the EU market. LDCs, benefiting from the EBA regime, do not pay import tariffs on agricultural (or any other) good. In general, a reduction of import tariffs would on the one hand benefit those developing country exporters, while on the other hand increase competition for those who have beneficial or tariff-free access already. Depending on developing countries' trade and production patterns, increased demand from the EU market could harm developing country consumers in the short term, but would lead to increased production and better rural livelihoods in the long term if price signals are transmitted and supply responses follow.
- **Agricultural product quality policy** refers to a broad range of legal frameworks that set the minimum requirements to which products sold in the EU have to comply with. At the heart of the

'quality policy' are comprehensive 'quality schemes', designed to protect high-quality EU products of a particular geographic origin and or of organic or traditional nature. International registration schemes apply to non-EU developing countries as well, so depending on the extent to which farmers and other agro-food producers in developing countries are capable of complying to these regulations, such quality schemes can either pose a non-tariff barrier to access the EU market or help secure added value (including on sustainability e.g. ethical or organic trade and geographical origin criteria) to developing countries' products, giving producers greater bargaining power over their product marketing.

- **Product standards** offer similar opportunities and challenges to developing countries' exports as they aim to ensure that all products on the EU market, whether produced in the EU or imported, meet the EU's high standards regarding hygiene, food safety, animal and plant health (so called Sanitary and Phytosanitary standards). Where EU product safety standards transcend international standards, they form an additional non-tariff measure to developing countries' exporters who lack the capacity to comply with the EU's strict requirements.<sup>60</sup>
- **Production quotas** are limitations on the amount of a product that can be placed on the market. Currently, the EU applies quota on the production of milk and sugar. Depending on the corresponding import quota a country has to adhere to, developing countries can benefit from EU domestic production quotas as they secure a market for their produce, like is the case for ACP sugar producing countries. Some consumers would however benefit from the lower food prices an abolition of EU production quota could evoke. Under the new legislation, dairy quotas will be eliminated in 2015 and sugar quotas in 2017.

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<sup>60</sup> In August 2013 UNCTAD issued a review of non-tariff measures and their economic policy implications for developing countries. See: [http://unctad.org/en/PublicationsLibrary/ditctab20121\\_en.pdf](http://unctad.org/en/PublicationsLibrary/ditctab20121_en.pdf)

## Annex II. Biofuels and food security

- **Impact on land, water and resource use.** Apart from second and third generation biofuels who rely on crop residues and waste, biofuels production requires land and therefore competes for land used for other economic and agricultural activities. It therefore increasingly interferes with land protection for environmental objectives, particularly biodiversity and carbon storage, potentially to the extent that it hampers the primary objective of climate change mitigation. Large-scale biofuel investments are playing an important role in land use transformation in developing countries often in ambiguous circumstances referred to as “land grabbing”.
- **Impact on market dynamics and food prices.** Although monitoring the net overall effect of biofuels production on world food prices is complex and blurred by the use of different economic models, it is widely recognised that the rising demand for biofuels does exert an upward pressure on food commodity prices because crops used for biofuels reduce the availability of these crops as food or feed. Given that rising oil prices constitute an opportunity gain for key food- or flex crops, biofuels production has also been associated with increasingly volatile food prices. A 2011 report by the UN Food and Agriculture Organisation (FAO) and nine other international organisations concluded that *“as long as governments impose mandates, biofuel production will aggravate the price inelasticity of demand that contributes to volatility in agricultural prices”* (FAO et al. 2011: p. 10).
- **Socio-economic impact and development opportunities.** Biofuels production can bring much needed capital, innovation and knowledge to developing country agriculture. On the other hand, large-scale farming for energy crops can drive out poor smallholder farmers and their communities, women in particular, either through land expropriations, competition or concentration of resources. Biofuels can best be put to use in rural developing countries for cooking, heating and local power generation.



### About ECDPM

ECDPM was established in 1986 as an independent foundation to improve European cooperation with the group of African, Caribbean and Pacific countries (ACP). Its main goal today is to broker effective partnerships between the European Union and the developing world, especially Africa. ECDPM promotes inclusive forms of development and cooperates with public and private sector organisations to better manage international relations. It also supports the reform of policies and institutions in both Europe and the developing world. One of ECDPM's key strengths is its extensive network of relations in developing countries, including emerging economies. Among its partners are multilateral institutions, international centres of excellence and a broad range of state and non-state organisations.

### Thematic priorities

ECDPM organises its work around four themes:

- Reconciling values and interests in the external action of the EU and other international players
- Promoting economic governance and trade for inclusive and sustainable growth
- Supporting societal dynamics of change related to democracy and governance in developing countries, particularly Africa
- Addressing food security as a global public good through information and support to regional integration, markets and agriculture

### Approach

ECDPM is a "think and do tank". It links policies and practice using a mix of roles and methods. ECDPM organises and facilitates policy dialogues, provides tailor-made analysis and advice, participates in South-North networks and does policy-oriented research with partners from the South.

ECDPM also assists with the implementation of policies and has a strong track record in evaluating policy impact. ECDPM's activities are largely designed to support institutions in the developing world to define their own agendas. ECDPM brings a frank and independent perspective to its activities, entering partnerships with an open mind and a clear focus on results.

For more information please visit [www.ecdpm.org](http://www.ecdpm.org)

### ECDPM Discussion Papers

ECDPM Discussion Papers present initial findings of work-in-progress at the Centre to facilitate meaningful and substantive exchange on key policy questions. The aim is to stimulate broader reflection and informed debate on EU external action, with a focus on relations with countries in the South.

**This publication benefits from the generous support of ECDPM's core, institutional and programme funders: The Netherlands, Belgium, Finland, Ireland, Luxemburg, Portugal, Sweden, Switzerland, Austria and the United Kingdom (DFID).**

ISSN 1571-7577

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