

(2) Information on respondents

2.1 Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution. Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

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2.2 Are you registered in the EU's Transparency Register? Please note: Organisations, networks, platforms or self-employed individuals engaged in activities aimed at influencing the EU decision making process are expected to register in the transparency Register. During the analysis of replies to a consultation, contributions from respondents who choose not to register will be treated as individual contributions (unless the contributors are recognised as representative stakeholders through Treaty provisions, European Social Dialogue, Art. 154-155 TFEU).

Yes (N° 501222919-71)

2.3 Name (entity or individual in their personal capacity)

Transparency International

2.5 What type of stakeholder are you?

Civil society

2.6 Please specify

Transparency International is the global civil society organisation leading the fight against corruption. It brings people together in a powerful worldwide coalition to end the devastating impact of corruption on men, women and children around the world.

Our vision is a world in which government, politics, business, civil society and the daily lives of people are free of corruption.

Since its founding in 1993, TI has played a lead role in improving the lives of millions around the world by building momentum for the anti-corruption movement. TI raises awareness and diminishes apathy and tolerance of corruption, and devises and implements practical actions to address it.

Transparency International is a global, politically non-partisan network including more than 100 locally established national chapters and chapters-in-formation. These bodies fight corruption in the national arena in a

number of ways. They bring together relevant players from government, civil society, business and the media to promote transparency in elections, in public administration, in procurement and in business. TI's global network of chapters and contacts also use advocacy campaigns to influence governments to implement anti-corruption reforms.

2.7 What is your place of residence (if you are answering as a private individual) or where are the headquarters of your organisation situated (if you are answering on behalf of an organisation)?

In one of the 28 EU Member States

2.8 Please specify

Germany

(3) Context: why a change is needed

3.1 There is a range of key global trends (e.g. changing geography and depth of poverty; challenges related to climate change, political, economic, social, demographic, security, environmental or technological) which will influence the future of development and the implementation of the 2030 Agenda. Which of these do you think is the most important?

Poor governance - in particular the wasting of scarce financial and natural resources in poor countries where basic needs are not covered, because of mismanagement and corruption. Abuses of power and financial, natural and other resources continues to have serious negative impacts on development, aggravating poverty, conflicts and political, social and economic instabilities. Significant loss of public revenue predicated by illicit financial practices such as money laundering and tax fraud distresses economic growth and pools of development finance. Achieving Goal 16 is therefore critically important for the future of development and the implementation of the 2030 Agenda as it cuts across and enables all other SDGs.

3.2 How should EU policies, and development policy in particular, better harness the opportunities and minimise the negative aspects of the trend you identified in the previous question?

Governance being a broad concept, its quality, bad or good, can be concretely assessed by the degree of commitment, and capacity, with which governments fight corruption. The EU should develop, strengthen and enforce policies that create incentives for governments, in particular developing countries, to implement effective anti-corruption and good governance reforms and to build resilient and responsive political institutions that can meet citizen expectations.

(4) Priorities for our future action: what we need to do

4.1 How can the EU better address the links between achieving the Sustainable Development Goals, the Paris Agreement on climate change and addressing other global sustainable development challenges?

The EU remains the global leader in terms of driving ambitious climate change mitigation and adaptation goals through a wide range of policies which have evolved significantly over the last decade. These policies must further mature within transparent and accountable frameworks in order that serious environmental catastrophes avoided. As a matter of internal and external policy particular attention may be given to:

- Sophisticating carbon market policies building on lessons learnt (to avoid gaming and fraud) as well as policies which promote a an impact sensitive carbon price, and fair but competitive market mechanisms globally;
- Advancing policies to enable technology development and transfer to enable carbon neutral economic growth;
- Ensuring that climate and development financing that is socially and environmentally accountable and transparent at all levels and including innovative financing such as green bonds;
- Ensuring the effective accountability and fiduciary standards of institutions which provide, deliver , receive and/or spend climate and development finance at all levels
- Ensuring that public decision-making around climate change adaptation and mitigation at all levels is transparency, accountable and participatory in line with the principles of the Aarhus Convention.
- Enabling consumer choice impact on phasing out carbon intensive and non-circular products and services through better access to information practices including practical labelling techniques
- Enabling resources and capacity building for developing countries to ensure a greater impact of the above recommended policy advancements

4.2 How should the EU strengthen the balanced integration of the economic, social and environmental dimensions of sustainable development in its internal and external policies, and in particular in its development policy?

EU policies must promote openness, accountability and effective public institutions, build trust between states and its citizens, and empower civil society to engage in the design, implementation and accountability of public policies, at all levels. Lessons learned from the MDG framework highlight the need for the post 2015 agenda to be accompanied by a sufficiently robust accountability framework to ensure that duty bearers are held accountable and to ensure that there is a balanced approach to implementing the goals. Robust, appropriate indicators for the SDGs together with a monitoring framework that includes the participation of civil society and other stakeholders can help to ensure this balanced approach. As a prerequisite for meaningful participation citizens need access timely shareable and disaggregated public data and information that can be used and understood by everyone.

4.3 What are the main changes you would like to see in the EU's development policy framework?

The revised European Consensus on Development should take the guiding principles of the 2030 Agenda as core values and ensure that the four dimensions of sustainable development (social, environmental, economic and governance) are equally taken into account. The EU's current Agenda for Change includes human rights, democracy and other key elements of good governance as a policy priority. The EU should continue to prioritise support to good governance but to include more of a focus on transparency, accountability, anti-corruption and civil society participation as these will be critical factors in achieving the post 2015 agenda.

4.4 In which areas highlighted above would you expect to see greater consistency between development policy and other areas of the EU external action in the implementation of the 2030 Agenda?

EU development policy and external action must work together to tackle the root causes of conflict and fragility and contribute to development, security and resilience in all the countries that the EU works in.

Resilient societies are underpinned by good governance therefore the EU must focus on rule of law, and strengthening democratic institutions and oversight institutions to ensure the sound management of resources.

4.5 In which areas does the EU have greatest value-added as a development partner (e.g. which aspects of its development policy, dialogue or implementation arrangements or in which category of countries)?

The greatest value added as a development partner is in the support the EU lends to regional cooperation among developing countries - and in particular the strengthening of the capacity of regional organisations (such as the African Union) and their transparent resource management.

4.6 How can the EU refine its development policy to better address inequalities – including gender inequality – in the context of the implementation of the 2030 Agenda?

EU development policy must help in addressing the root causes of corruption so that it can better address inequalities, including gender inequality. A report commissioned by UNDP on 8 developing countries in 2012 showed that corruption had a significant negative impact on women as it makes it much harder and more expensive for them to access public services and resources. EU development policy should also support women's participation in the governance and decision making process.

4.7 How can the EU development policy make a stronger contribution to the security of people? How can EU development policy contribute to addressing the root causes of conflict and fragility and contribute to security and resilience in all the countries where we work?

There is a wealth of evidence which points to a strong link between corruption and conflict. A 2014 study by the Institute of Economics and Peace, for example, found an empirical link, and that once countries reach a certain level of corruption, there's a 'tipping point'—a point at which a small increase in corruption can experience a large increase in the following: political terror, political instability, violent crime rates, violent demonstrations, organized conflict, access to small arms and light weapons, homicide rate, and level of perceived criminality. Accepting this strong link between corruption and instability should make tackling corruption a top priority for the EU.

4.8 How can a revised Consensus on Development better harness the opportunities presented by migration, minimise the negative aspects of irregular migration on the implementation of the 2030 Agenda and better address the root causes of irregular migration and forced displacement?

Little attention has been given to one of the chief drivers of instability and facilitators of mass migration - corruption. Research shows it is often a chief contributor to the overall violence and instability forcing people to migrate. Widespread corruption undermines the legitimacy and stability of a government especially if it fails to meet the needs of its people. Research also shows that corruption prolongs armed conflict and violence and

weakens peace-building efforts, while the trafficking of human beings as well as refugee smuggling, which has become a multi-billion dollar business, thrives on corruption.

(5) Means of implementation: how do we get there?

5.1 How can EU policies, and EU development policy in particular, help to mobilise and maximise the impact of the increasing variety of sustainable development finance, including in particular from the private sector?

While government aid will be central to achieving the SDGs, the EU must re-think traditional approaches to financing sustainable development if we are to collectively achieve the goals set out by this new agenda.

As foreign direct investment has become more concentrated in a few middle-income and emerging economies, and away from the poorest Official Development Assistance should mainly focus low income countries and partly on middle income countries. ODA should then be phased out gradually in favour of blending and private investment.

5.2 Given the evolving availability of other sources of finance and bearing in mind the EU's commitments on Official Development Assistance (e.g. Council Conclusions from 26 May 2015 on "A New Global Partnership for Poverty Eradication and Sustainable Development after 2015", and inter alia, paragraphs 32 and 33), how and where should the EU use its Official Development Assistance strategically and to maximise its impact?

Recalling the EU's unfulfilled commitments concerning Official Development Assistance (0.7% target) the focus should be on low income countries and partly on middle income countries. To ensure that Official Development Assistance is being used strategically and to maximise its impact the EU should keep in mind the following recommendations:

- Civil society participation – institutionalise people's participation at all levels in the design, implementation and evaluation of ODA. There should be a clear complaints procedure where citizens can report corruption
- Ensure that ODA is used in the interests of people not corrupt leaders
- ODA should be subject to mandatory transparency and accountability standards

Include as a priority a focus on good governance, strong institutions and anti-corruption

- ODA should ensure effective and accountable institutions and enhance delivery of public goods and services through commitments to end illicit financial flows
- ODA should also help to substantially reduce corruption and bribery in all its forms

5.3 How can the EU better support partner countries in mobilising their own resources for poverty eradication and sustainable development?

The EU should reward good governance and in particular effective anti-corruption policies in countries which use, in a developmental manner, their own resources before asking for external support. The EU should also support the curbing of illicit financial flows and other forms of corruption and promote strong institutions to ensure sound public financial management that can help safeguard domestic resources for poverty eradication and sustainable development. Finally when donors channel funding through governments' budgets, in the form of

general or sectoral budget support, it must be ensured that those governments have the necessary institutional capacities to prevent any misappropriation of funds or corruption.

5.4 Given the importance of middle income countries to the implementation of the 2030 Agenda, what form could differentiated partnerships take?

Beyond official assistance a focus could be on private investment. As the Lisbon Treaty gives competence to the EU for dealing with private investment – as part of EU trade policy – investment promotion and protection agreements should be negotiated with partner countries with the inclusion of effective anti-corruption clauses to lay the bases for monitoring the transparent and accountable operating of these agreements. We welcome the European Commission's announcement in 2015 that it will include ambitious anti-corruption provisions in all future EU trade agreements.

5.5 Given experience so far in taking into account the objectives of development cooperation in the implementation of EU policies which are likely to affect developing countries (e.g. [Policy Coherence for Development: 2015 EU Report](#)), how should the EU step up its efforts to achieve Policy Coherence for Development, as a key contribution to the collective effort towards policy coherence for sustainable development? How can we help ensure that policies in developing countries, and internationally contribute coherently to sustainable development priorities?

The EU must develop a comprehensive implementation plan for achieving the 2030 Agenda which ensures coherence between all EU policies to successfully realise the sustainable development Goals including Goal 16. In addition, the EU should develop and implement a comprehensive *anti-corruption strategy* which clarifies how EU instruments and legislation in policy domains such as development assistance, trade, energy, migration, foreign policy and internal market deter corruption and/or bolster the anti-corruption commitments of governments around the world.

(6) The actors: making it work together

6.1 How should the EU strengthen its partnerships with civil society, foundations, the business community, parliaments and local authorities and academia to support the implementation of the 2030 Agenda (including the integral Addis Ababa Action Agenda) and the Paris Agreement on climate change?

The lion's share of the responsibility for implementing the Sustainable Development Goals will be on national governments working together with non-state actors such as civil society organisations. The EU should have as one of its main priorities to preserve or enlarge the space for civil society organisations and anti-corruption activists to carry out this important work, to facilitate such work in its policies and to provide the necessary incentives to governments to do so. This will also require the EU to speak out boldly against measures designed to restrict the activities of civil society organisations where necessary. The EU should encourage where possible the inclusion of civil society organisations in discussions and fora where anti-corruption reforms are agreed and reviews, such as the reviews of the implementation of the UN Convention Against Corruption, the review process for the UN SDGs and in bilateral negotiations. The EU should also encourage governments to sign up to multi-stakeholder transparency initiatives that include a place for civil society at the table, such as the Extractive Industries Transparency Initiative and the Open Contracting Partnership. These points should also be an integral part of the design, implementation and evaluation of Official Development Assistance.

6.2 How can the EU promote private sector investment for sustainable development?

Corruption creates an unstable and unreliable investment climate and therefore inhibits private sector investment. In a survey of more than 390 senior business executives, almost 45 per cent said corruption risks led them to not enter a market or pursue a business opportunity. More than 35 per cent of companies polled in another survey said they opted out of attractive investments due to corruption in the host country. The EU should therefore see fighting corruption as a necessary precondition of promoting greater private sector investment.

6.3 How can the EU strengthen relations on sustainable development with other countries, international financing institutions, multilateral development banks, emerging donors and the UN system?

NO TI POSITION

6.4 How can the EU best support partner countries to develop comprehensive and inclusive national plans for the implementation of the 2030 Agenda?

By providing a good example and ensuring the EU develops its own comprehensive and inclusive plan for the implementation of the 2030 Agenda. The EU should also encourage partner countries to develop their plans in a participatory fashion (with national and local civil society) that result in outputs that are people-centred and human-rights focused and that entrench monitoring and accountability processes that are transparent and inclusive.

6.5 What are the best ways to strengthen and improve coherence, complementarity and coordination between the EU and the Member States in their support to help partner countries achieve poverty eradication and sustainable development?

NO TI POSITION

6.6 How can EU development cooperation be as effective as possible, and how can we work with all partners to achieve this?

The ambition reflected in the SDGs and the resources required to achieve them are immense. These financial resources if, and when, they become available cannot be wasted (through mismanagement and corruption) and must be used in ways that foster greater transparency, accountability and citizen participation. Fiscal transparency, rule of law, expenditure monitoring and accountability can contribute to more efficient spending that achieves better development results. The EU should ensure that its policies as regards third countries as well as legislation that regulates the activities of multinational corporations, are contributing to reductions in corruption, bribery, and illicit financial flows.

6.7 What further progress could be made in EU Joint Programming, and how could this experience be linked with other EU joined-up actions in supporting countries' delivery of the 2030 Agenda?

The EU and other partners should ensure they have an integrated approach to development where the adverse impact of corruption in poverty eradication is recognised. Future joint programming must be led by the 2030 Agenda which includes Goal 16 (good governance and the fight against corruption).

(7) Keeping track of progress

7.1 How can the EU strengthen its own use of evidence and analysis, including in the development field, to feed into its regular review on the Sustainable Development Goals to the UN?

NO TI POSITION

7.2 How can the EU help to ensure the accountability of all actors involved in implementation of the 2030 Agenda, including the private sector? How can the EU encourage a strong and robust approach to the Follow Up and Review of the 2030 Agenda from all actors?

Review and accountability procedures that are agreed upon for state actors etc. must have the scope and the mandate to also monitor the impact and actions of other actors, including the private sector public private partnerships. The architecture for follow up and review of the post 2015 agenda should for example review the private sector's contribution to the SDGs and on the implementation of the UN Guiding Principles on Business and Human Rights. Such monitoring and review would complement the monitoring of specific measures on private sector responsibility included in the Post 2015 Agenda.

7.3 How should EU development cooperation respond to the regular reviews on progress of the partner countries towards the 2030 Agenda goals?

Funding and assistance for third countries should be aligned with the existence of SDG targets, willingness to engage in monitoring and review mechanisms, the role of civil society in these mechanisms, and progress in meeting Goal 16 targets. The EU and its Member States must show leadership in strengthening participatory processes, which will enable the public and organised civil society alike to contribute to and influence the design and implementation of the 2030 Agenda for Sustainable Development at all stages and to engage in a systematic way in monitoring, review and accountability processes.