In November 2020, the European Commission published its Staff Working Document (SWD) “Delivering on the UN’s Sustainable Development Goals – A comprehensive approach”. The SWD explains how the European Commission is “taking forward its commitment to sustainable development, the 2030 Agenda and the SDGs through its internal and external action policies, while also monitoring progress at Member State and European Union levels.”

We are glad to see the Commission has taken a fresh look at the SDGs and expressed interest in implementing the 2030 Agenda, linking it to the European Green Deal. We also welcome the statement that “relaunching the economy does not mean going back to the status quo before the crisis, but taking forward the agenda of sustainability and resilience” and appreciate its ambition to react to the COVID-19 crisis with a “beyond business-as-usual approach”. We appreciate the Commission’s reaffirmed commitment “to refocus the European Semester on integrating the SDGs” and we are looking forward to seeing a reform of the European semester process which is compliant with the SDGs after its temporary link with the Recovery and Resilient Facility is over. In the current cycle we look forward to seeing the implementation of the SDGs at the core of the National Recovery and Resilience Plans (NRRP).

However, the Staff Working Document merely provides an overview of existing initiatives of the European Commission. Five years after the SDGs were adopted, we have as of yet only seen a reaffirmation of the EC’s commitment towards the SDGs without real action on how to achieve them and what they actually entail. In short: This is not enough! What we need now given the effects of the COVID-19 pandemic on Europe and the world, and given the need for a healthy recovery the SDG implementation can contribute to, even more urgently is a roadmap, concrete initiatives, action plans and an SDG implementation strategy with new ideas, clear political objectives, decision-making and adequate funding.

The SWD leaves us with the need to reaffirm our common position on the implementation of the SDGs in, by and through the European institutions: Statements on the importance of the SDGs are important for shaping the narrative, but they are of little worth if they are not followed by tangible and coherent actions.

SDG Watch Europe, therefore, calls upon on the Commission to do the following:

- Present a comprehensive strategy for a Sustainable Europe 2030, accompanied by a clear and policy coherent implementation plan. We believe that without a dedicated sustainable development strategy, the risk is to add an SDG label ex-post on every proposal related to the SDGs without ensuring global coherence. A strategy with objectives, binding targets, measurable
indicators, activities and timeline provides a clear way to operationalize your engagement towards the SDGs and guarantees an interconnected application to ensure that gaps and risks are reduced.

- **Elaborate on how the President of the European Commission Ursula von der Leyen will ensure accountability, responsibility and a whole of government approach on SDGs’ implementation.** The Commission President’s personal leadership on sustainable development and the implementation of the SDGs overall coordination and direction must come from the Commission’s highest level to ensure the coherence of its policies and actions towards a genuinely sustainable future. We suggest setting up clear coordination mechanisms within the College and the different DGs of the European Commission. The SDGs should also be formally integrated into the DGs’ work plans including respective SDG implementation plans relevant to their fields of responsibilities.

- **Link the Eurostat indicator set and report to a political process with a response from the Commission** on how it will adjust its action to reach those SDGs that are not progressing. Furthermore, the development of the indicator report must also ensure meaningful participation and inclusion of civil society. We have highlighted our main concerns and points of criticism in our [statement by the SDG Watch Europe Steering Group on Eurostat’s 2020 SDG monitoring report](https://www.sdgwatch.org) as well as our recent report *Time to Reach for the Moon*. Yet again for the 2021 report, the indicator set was prepared without proper discussion with civil society, but rather via email exchange with select organisations.

- **Revitalize civil society and local authorities’ engagement on the SDGs, by establishing a permanent, inclusive and truly participative civil society and stakeholder platform.** The Commission’s multi-stakeholder platform was an important mechanism to engage with civil society. The European Climate Pact and The Conference on the Future of Europe are not fit to replace this important part of SDG dialogue in the EU. The former only addresses climate-related issues, thus failing at having a broad definition of sustainability including all economic, social and environmental issues embedded in the SDGs. The latter is set to be a project for broad but temporary citizen participation, spanning over 1 or 2 years, with the role of civil society organisations still unclear or possibly clearly absent, thus failing at being a formalized long-term civil-society engagement mechanism.

- **Publish the internal reviews on SDG implementation.** While we believe existing sustainability impact assessments are very important, they should entail the broad vision embedded in the SDGs (social, economic, environmental and governance aspects). Ex-ante assessments should also be mandatory to each new initiative and when one initiative does not pass the sustainability impact assessment, it should be revised or withdrawn, following the precautionary principle.

- **Place the SDGs at the core of the European Semester cycle with 5 to 10 headline indicators** that address the EU’s main sustainability challenges and establish an annual and multi-annual SDG monitoring and reporting cycle as a meaningful European Semester Cycle.

SDG Watch Europe is Europe’s largest cross-sectoral civil society alliance for sustainable development, bringing together more than 5,000 organisations, local authorities, cooperative enterprises and universities across the EU, including environmental and climate, animal welfare, social welfare and public health, humanitarian and
development, human rights, fair trade, education, research and cultural organisations and networks representing children, young people, women, families, and people with disabilities. SDG Watch Europe mission is to ensure that the EU and its member states fully implement the SDGs by 2030.

We would welcome the opportunity to work more closely with the European Commission and to exchange views on the issues highlighted above. We are committed to participate in a meaningful way to establish robust and sustainable policies.

Signed by SDG Watch Europe and member organisations

Alianza por la Solidaridad
Caritas Europa
CEEweb for Biodiversity
Culture Action Europe
Climate Alliance
Deutsche Stiftung Weltbevölkerung (DSW)
Don Bosco International
European Environmental Bureau
European Public Health Alliance
Fingo
Futuro en Común
German NGO Forum on Environment and Development
Italian Alliance for Sustainable Development (ASviS)
Lifelong Learning Platform
Lithuanian NGDO Platform
Make Mothers Matter
National Society of Conservationists - Friends of the Earth Hungary
Nyt Europa
Seas At Risk
SDG Watch Austria
SLOGA Slovenian NGO platform for development, global education and humanitarian aid
Social Platform
WWF European Policy Office