

How To Improve the Coherence of EU Trade-Related Policies Regarding the UN Sustainable Development Goals?

Comment améliorer la cohérence des politiques commerciales de l'Union européenne au regard des objectifs de développement durable des Nations Unies ?

Wie lässt sich die Kohärenz der handelsbezogenen EU-Politiken im Hinblick auf die Nachhaltigkeitsziele der Vereinten Nationen verbessern?

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Policy coherence, EU policy frameworks and agricultural trade policies

In view of the EU's sustainability goals, policy coherence can be viewed as aligning policies across sectors to reduce contradictions and enhance synergies. It is both a principle and a process through which governments seek to minimise conflicts and enhance the cumulative effect of their actions between and within different policy areas to achieve the goals set (Niemenmaa *et al.*, 2021). In a complicated political system and developed economy, synergies and trade-offs inevitably exist between policies addressing the three dimensions of sustainability. Policy coherence is hence rather a persistent quality of the process, and we need to find ways to deal with it.

In the EU, and in the case of international agricultural trade, there are two major frameworks for policy coherence: Policy Coherence for Development (PCD) and Policy Coherence for Sustainable Development (PCSD). PCD, established in 1992, focuses on making EU policies more supportive of development goals. PCSD, launched by the OECD in 2016, extends this idea to all aspects of the

2030 Agenda and the SDGs (EU Sustainable Development Goals). PCD is a binding principle that seeks to reduce contradictions and enhance synergies between EU policies and developing countries. PCSD is a wider approach and policy tool for integrating the various dimensions of sustainable development at all stages of policymaking in all countries, also within the EU. Its main objectives are to increase governments' capacities (i) to foster synergies across economic, social and environmental policy areas, (ii) to identify trade-offs and reconcile domestic policy objectives with internationally agreed objectives, and (iii) to address the spillovers of domestic policies. The Green Deal is a set of policy initiatives to attain and implement the SDGs in the EU. The Farm-to-Fork Strategy (F2F) is a key part in the Green Deal, aiming for a fair, healthy, and environmentally friendly food system. It is broader than the Common Agricultural Policy (CAP) and addresses the coherence of all food related EU policies when trying to attain the SDGs (European Commission *et al.*, 2022).

Our analysis draws from two Horizon 2020 projects: MATS and TRADE4SD. [Figure 1](#) summarises their

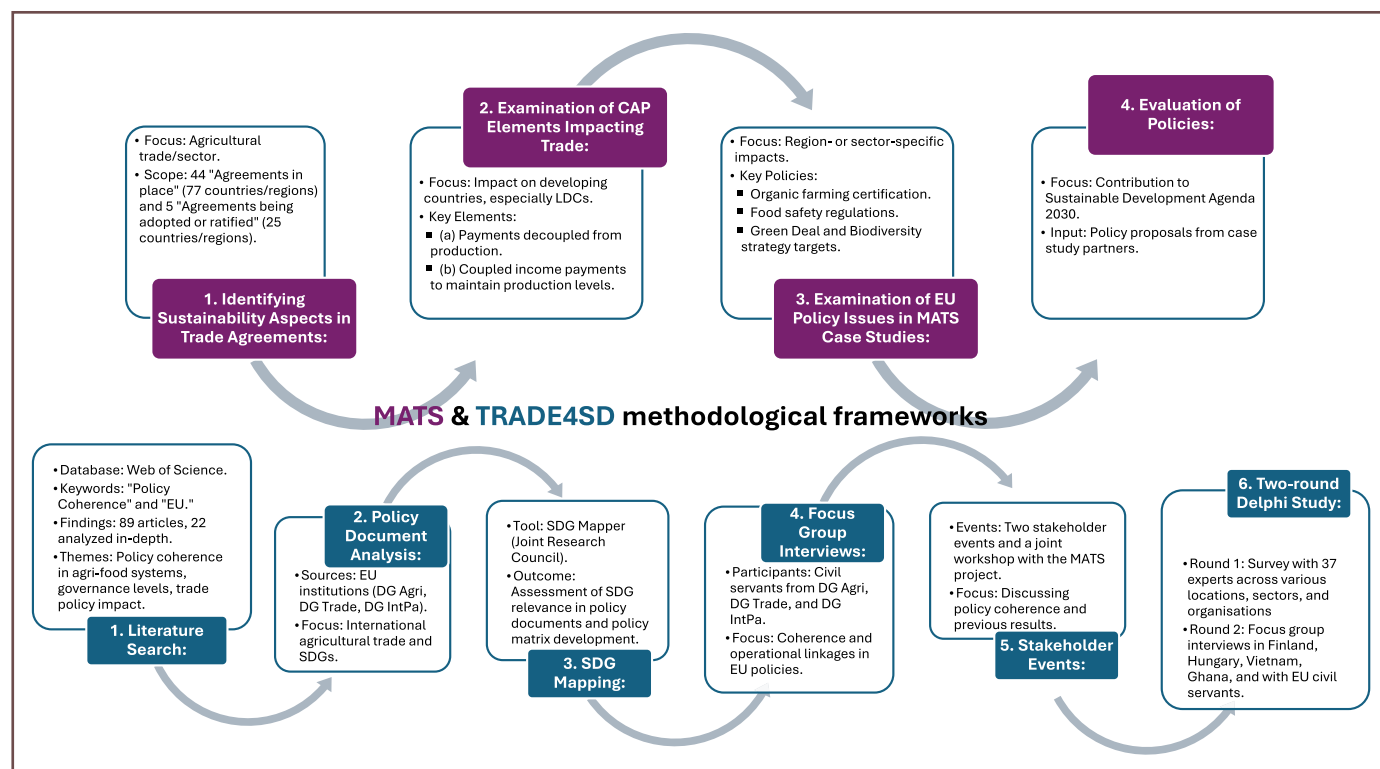
complementary methodologies, which include legal mapping, case studies, and Delphi surveys with expert stakeholders. Based on this work, we first address EU policy frameworks and the process quality of policy coherence. Second, we discuss the coherence of EU policy frameworks with respect to their impacts on SDGs. We focus on the degree of policy coherence between the EU's internal and external policies and the alignment of EU agricultural trade policy and trade agreements in economic, social and environmental terms. In the conclusions we identify obstacles and enablers of policy coherence, and finish with comprehensive building blocks, accompanied by a set of detailed policy recommendations.

Before turning to the process nature of policy coherence, [Figure 1](#) summarises the complementary methods and empirical material used in our analyses.

Toward a systemic framework for understanding and advancing policy coherence

Policy coherence involves three key challenges: first, horizontal incoherence across sectors like

Figure 1: MATS & TRADE4SD methodological approaches to address coherence issues



Source: Authors' own.

agriculture, health and trade; second, vertical incoherence between the EU and its Member States (see also Kurze and Lenschow, 2018), and third, timing mismatches between political cycles and sustainability needs. The policy coherence figure (Figure 2) simplifies and outlines the conditions within which all EU policy frameworks function applied to the case of sustainable agri-food system development.

Structural constraints for vertical multi-level governance include institutional fragmentation, competence and legal constraints, strategic and normative ambiguity, as well as global regulatory and economic pressures (Young, 2015).

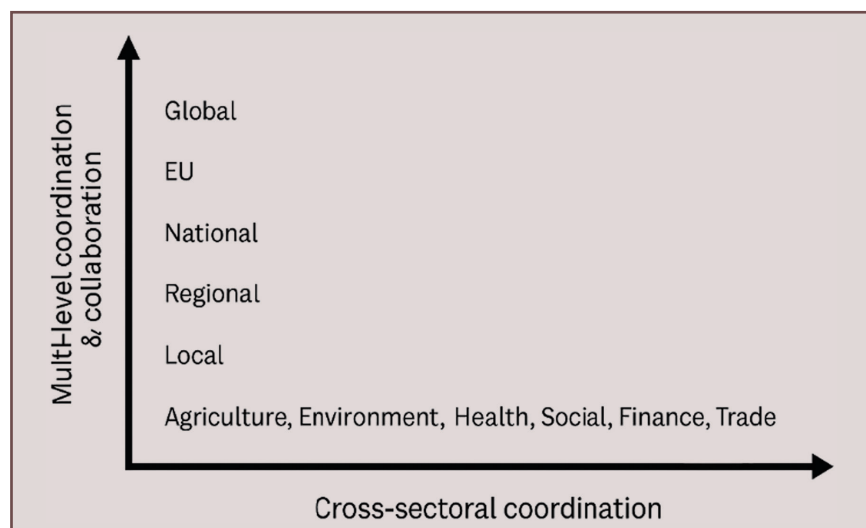
In addition, a third dimension – time – must be considered in advancing policy coherence. Both the long-term span of promoting sustainability, and the strategic use of political cycles, timings and momentum count in the policy process. The election calendar is the main driver in EU administration, while synchronisation has simultaneously to be sought with international political time slots. Moreover, policy dimensions evolve at a different pace regarding the

different sustainability dimensions. For example, whereas environmental sustainability as a critical element of EU policies has gradually been established, measures to promote social sustainability are only just emerging.

When horizontal and vertical coherence unite, we can talk about a holistic, whole-of-government approach. In addition to a

well-synchronised policy formation, decision-making and policy implementation structures, policy coherence of any policy framework requires a connection to the people it represents, which can be called the whole-of-society approach. It refers to politicians' tasks and ability to channel people's values, and to argue, advocate and make decisions that make a difference in a legitimate manner.

Figure 2: Simplified framework: Policy coherence for sustainable agrifood-system development



Source: Authors' own.

For our case the whole-of-government approach to policy coherence means advocating for solutions that address the complexity of food systems as a whole (Borchardt *et al.*, 2024). In concrete terms one may emphasise the interconnectedness of food production and consumption processes, recognising that changes in one area (e.g. agricultural practices) often have cascading effects on other sectors in society. Thus, coordination implies 'moving beyond' the food sector, by considering health outcomes, energy, logistics, the financial sector, environmental sustainability and social equity – all connected to the SDGs. At present, the F2F as the EU's food systems approach has limitations in integrating necessary activities to a coherent whole, as the following sections will show.

Coherence challenges in the current EU policy frameworks and future pathways

When analysing how consistent EU policies are in the area of international agricultural trade, we studied how horizontal and vertical coherence appear, whether and how sustainability has been addressed, and what is likely to happen in the future. As discussed above, *vertical coherence* means ensuring that policies are aligned between different levels of governance—from the EU level (such as the European Commission) down to national and regional authorities in the Member States. In practice, this is often difficult because responsibilities are split. For example, while the EU sets rules for agricultural production and trade, national governments remain in charge of policies that affect food consumption, such as health and nutrition guidelines. If these levels do not work in sync, it can lead to contradictions or gaps in the overall food system approach.

Horizontal coherence focuses on alignment between policy areas at the same governance level, such as the EU's trade policy and agricultural policy, or between policy

frameworks, such as the F2F and the CAP. Within the Commission, interservice working groups have a role in fostering coherence, e.g. the F2F work is organised under the lead of DG SANTE (Directorate General for Health and Food Safety), with DG INTPA (International Partnerships), DG TRADE and DG AGRI complementing in international and agricultural aspects.

“ La politique de l'Union européenne en matière de commerce agricole international se trouve à un tournant décisif. ”

Addressing sustainability in EU international agricultural trade.

Our analysis of 3,700 legal acts shows an uneven integration of SDGs (Figure 1). While climate goals (SDG 13) are well embedded, social aspects like gender equality (SDG 5) appear infrequently. The EU has been building a sustainability framework for decades, a long time before the UN Agenda 2030. It has taken strategic and regulatory steps

under different Commissions and Parliaments, resulting in a substantial but somewhat uneven approach. Some essential SDGs such as Gender (SDG 5) and Poverty eradication (SDG 1) are seldom addressed. Environmental goals (climate and land, SDGs 13 and 15) take precedence, while social (hunger, SDG 1) and economic aspects (work SDG 8) are gradually evolving.

Expert views on current coherence, future and enablers.

In line with Figure 1 (Delphi study), TRADE4SD used agricultural, sustainability and trade experts from both public, private and civil society sectors to assess which policy approaches they considered coherent with international agricultural trade policy. These included diversification of trade flows, investments in global food value chains, digital solutions to promote sustainable agriculture and research and innovation in sustainable agriculture. Yet, when looking into the future (to 2035), there was less optimism about EU progress in sustainable food systems-related policy approaches. According to experts, policy approaches related to sustainable food systems are currently difficult to implement, as they require difficult and potentially unpopular political decisions, such as halting biodiversity loss and



Systemic, holistic and whole-of-governance thinking is essential for agri-food trade to become sustainable © Randi Fath, License Unsplash.

implementing climate change mitigation measures. However, the experts expected that the EU will progress with these policies in the longer run. (For more details, see Vihinen *et al.* 2024).

Digital solutions in the form of tools which support policy management can offer opportunities to optimise policy synergies and minimise trade-offs through better policy formation. Such data-driven policy-formation is a case in point for supporting the efficacy of the EU's international agricultural trade policies, for example by supporting the more effective use of Sustainability Indicators, Sustainability Assessments and more robust Sustainability Proofing. An example of policy making skills is the use of data-driven policy formation in building shared understanding of facts, and for launching common concepts and policy approaches for

sensitive topics, such as social sustainability.

Policy coherence and sustainability issues in EU trade-related policies

A series of policy contradictions, inconsistencies and trade-offs must be overcome as they can undermine coherence among agricultural, environmental and trade policies. Research suggests caution regarding the coherence and thus efficiency of the new EU trade policy strategy, which focuses on supporting sustainable value chains and setting global standards (Blot and Kettunen, 2021). EU trade policy is abundantly inconsistent, since it includes initiatives to stimulate greening, such as liberalising trade in sustainable goods and services while at the same time using sustainability standards throughout value chains. However, this strategy does not

address the need for synergies between internal and external policies shaping trade.

The MATS examination of EU trade agreements (Figure 1) suggests that only a few trade agreements consider agriculture's environmental impact in their provisions. These agreements include issues such as the impact on soil and water quality, soil erosion and pollution by agricultural chemicals, the management of impacts using antibiotics and decontaminants, conservation and sustainable use of biological diversity, and genetically modified organisms.

Challenges in aligning F2F and Biodiversity strategies as policy frameworks under the Green Deal. Two of the main Green Deal components, aiming at sustainable food systems, namely the F2F and the Biodiversity



EU agri-food trade policy is not coherent at the moment © Sabine Freiberg, License Unsplash.

strategy, are lacking the holistic approach necessary to align with the CAP, a long-established policy, and its ramifications. Some of the measures under F2F—such as restrictions on inputs like pesticides and fertilisers—have been introduced without creating a clear framework for farmers in meeting these requirements. This lack of alignment makes it more difficult to achieve the broader objectives of the Green Deal in areas such as biodiversity conservation.

Impacts on developing countries and lessons learnt

By Global South, we refer to low- and middle-income countries, particularly in Africa, Asia and Latin America. The introduction of decoupled subsidies by the EU has significantly decreased the CAP's impact on such countries. However, decoupled payments can still negatively influence the Global South since they act as a production incentive for EU farmers. Empirical evidence corroborates this result, especially for net-exporting developing countries and/or the rural livelihoods of net-importing developing countries. The following sections provide more specific examples from the perspective of the dairy sector, sugar sector, organic certification and food safety regulations.

“ Die internationale Agrarhandelspolitik der EU befindet sich an einem kritischen Punkt. ”

Dairy and sugar sector issues.

Coupled subsidies for the EU milk sector combined with market interventions indirectly subsidise exports, thus distorting the market, potentially harming farmers in developing countries. The use of innovative technology to produce milk powder exerts additional pressure on world milk prices as



Coordination is the key for successful agri-food trade policies © Sigmund, License Unsplash.

well as on African countries' milk exporters. However, an abrupt decrease in EU milk powder exports could threaten food security in import-dependent countries in Africa. Likewise, coupled subsidies can incentivise the expansion of sugar beet cultivation, thus resulting in a further reduction of EU sugar imports from developing countries.

The EU Organic Farming Certification Scheme.

The issue raised in the MATS case studies is the decision of the EU not to actively promote the solution of equivalence. Instead, the EU tends to suggest the procedure of individual recognition of control and auditing organisations as almost the only solution for countries wishing to export their organic produce to any EU country. Formal recognition and encouragement of regional organic standards, such as the East African Organic Products Standard (EAOPS), the Pacific Organic Standard (POS), the Central American initiative, the Asia Regional Organic Standard (AROS), the African Regional Standard (ARS), and lastly, the Association of Southeast Asian Nations (ASEAN) Standard for Organic Agriculture (ASOA) would be a crucial step towards improving on efficacy and coherence concerns. (Pekdemir, 2018).

Beyond such benefits from standards recognition, countries in the Global South where organic farming is increasing rapidly, could contribute more broadly to sustainable production practices adoption and to alleviating poverty. Furthermore, the EU could encourage Global South countries in their efforts to cooperate more effectively among them but also with stakeholders along the value chain in order to promote regional organic standards, support local value chain growth that is better adapted to the local circumstances and practices, as examples from Kenya suggest (Case Study 11: Private standards and sustainable trade: <https://sustainable-agri-trade.eu/private-standards-and-sustainable-trade/>). As the Kenya example shows, adopting group certification could help to reduce certification costs and contribute to fulfilling the need for adaptation to local circumstances.

Harmonised Food safety regulations for EU imports, extension and training.

EU support for systematically taking stock of local phytosanitary practices, knowledge and experience, and creating legally harmonised and publicly available knowledge bases accessible to farmers and practitioners in developing countries could be vital

steps for addressing phytosanitary issues in the Global South, also supporting their market access via the EU. In addition, EU support for institutional quality by reinforcing and reforming agricultural extension services towards an integrated and IT-based knowledge management system with access to transparent research results could be of great importance for supporting both local and global sustainable value chains growth.

“ The EU’s international agricultural trade policy is at a critical juncture. ”

The above could be seen not only as examples that coherence needs to be addressed conceptually and operationally, but also that although legal harmonisation is valuable, the achievement of coherence requires the alignment of different policy domains through both legal and institutional mechanisms.

Conclusion and policy recommendations

The EU’s international agricultural trade policy is at a critical juncture. Strengthening policy coherence is now more essential than ever to ensure that trade policy effectively contributes to sustainable development. On the one hand, the EU has over the years made strong strategic and legal commitments to sustainability, reflected in frameworks like the Green Deal, the Farm-to-Fork Strategy, and Policy Coherence for Development. On the other hand, persistent policy fragmentation, conflicting objectives and insufficient integration across policy areas and sectors continue to undermine the EU’s effectiveness in achieving the SDGs through its trade-related policies. Our analysis, summarised in Figure 3, identifies several key obstacles that hinder greater coherence in EU international agricultural trade. The analyses from the TRADE4SD and MATS project results also identify a set of critical enablers that can support a transition to more coherent policymaking.

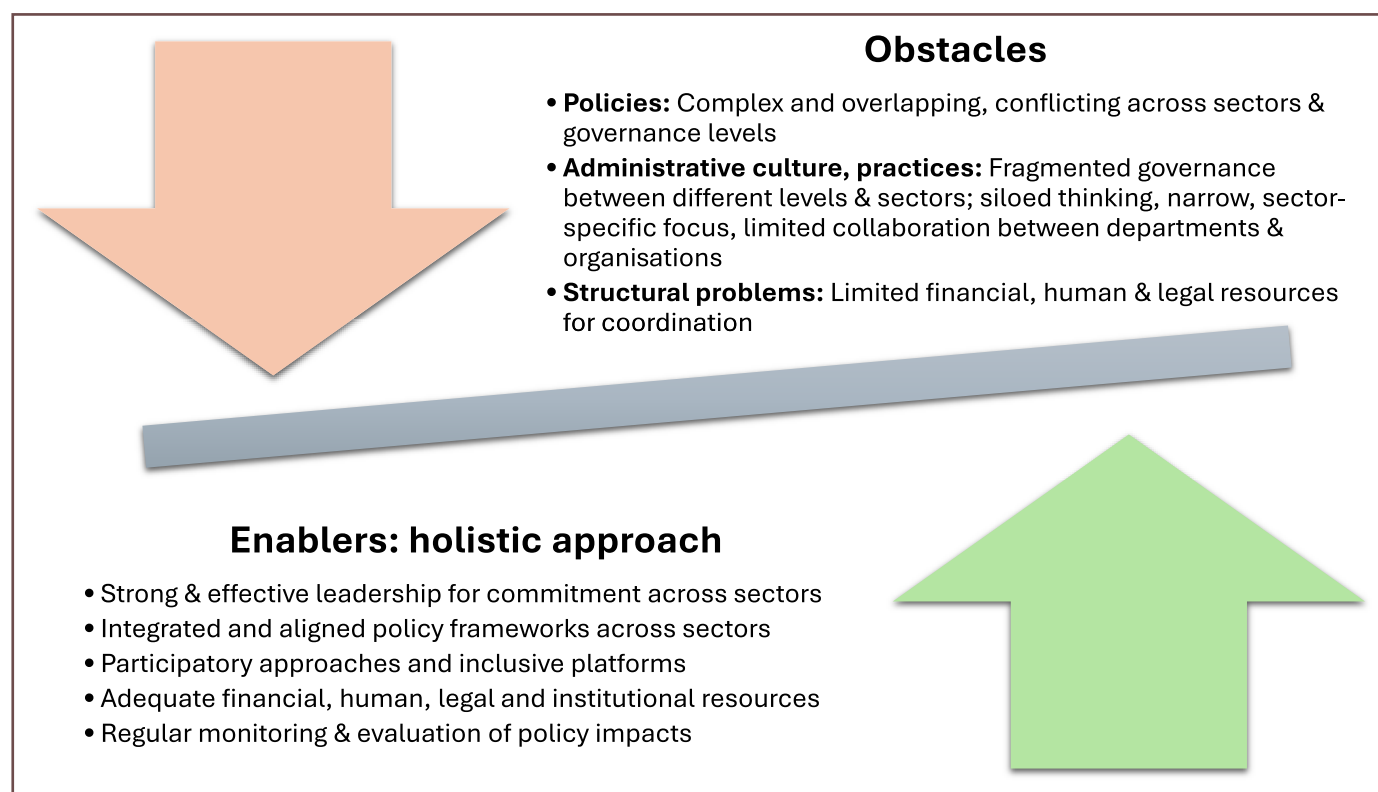
First, the identified obstacles and enablers show that recognising policy

trade-offs and synergies is essential, as in the case of the CAP policy measures and trade with the Least Developed Countries, but there is no single ‘silver bullet’ to be found. Progress in policy coherence will remain meagre when focusing on policy instrument level. Instead, we can start with the notion that policy coherence and SDGs are both systemic phenomena which evolve over time. Hence, we need first a clear frame and goals for enhancing systemic, holistic and thus whole-of-governance thinking.

Second, will, skill and trust are prerequisites for being able to choose between goals that can be justifiably disagreed about and cannot be reached simultaneously – the basic characteristics of politics. It implies deliberative discussion on *values*, since *interests* (also those of EU trade partners) must be reconciled. Data-driven policy processes using impact indicators, robust evidence and sustainability proofing offer *facts* and common ground for discussions, also on sensitive issues such as child labour or living income.

Third, the policy coherence process requires public sector innovations. It

Figure 3: Obstacles and enablers of policy coherence in EU’s international agricultural trade



is essential to strengthen institutional capacities for adopting a systemic approach in decision-taking and in the daily work on the Commission. Concrete steps in this direction are, for example, the principle of collegiality of the Commission's internal decision-making and the use of Commission vice-chairs. Moreover, a Team Europe-type approach should be encouraged. It means joining EU forces so that the action becomes more than the sum of its parts. Team Europe consists of the European Union, EU Member States as well as the European Investment Bank and the European Bank for Reconstruction and Development. Anticipatory systems thinking tools (e.g. foresight) and improved coordination mechanisms are steps in this direction. To make better policies, recognising and utilising windows of opportunity in policymaking (timing, leverage points, political realism) has to be encouraged as part of a more facts-based, impacts- and

indicator-focused trade policy making process.

Finally, in addition to these systems-wide innovations, we recommend that the following practical key actions are taken in order to improve policy coherence for advancing sustainable development:

- (i) enhance EU-internal coordination mechanisms, including cross-sectoral working groups, foresight activities, and shared digital platforms for policy development, learning and capacity-building;
- (ii) integrate sustainability proofing in all EU trade agreements and CAP instruments through tools such as SDG mapping, sustainability indicators, and *ex-ante* and *ex-post* sustainability impact assessments;
- (iii) reform trade policy further to ensure that environmental, economic and social sustainability objectives are consistently

addressed across internal and external policy domains;

- (iv) ensure trade agreements explicitly cover agriculture, including provisions related to climate change, biodiversity and social justice; and
- (v) improve CAP coherence with SDGs, particularly by reviewing the use of coupled payments and strengthening support for smallholder farmers, sustainable production practices and food value chains in the Global South.

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Summary

How To Improve the Coherence of EU Trade-Related Policies Regarding the UN Sustainable Development Goals?

 In view of the EU's sustainability goals, policy coherence aims to reduce contradictions, enhance synergies and boost the effectiveness of actions across various policy areas to achieve the goals set and deliver aligned, sustainable outcomes. Two EU projects provide evidence on how to improve coherence between the EU policies involved in international agricultural trade and in promoting sustainability objectives. Three main issues are identified: coherence limitations within the Farm-to-Fork (F2F) strategy, inconsistencies between governance levels (EU, Member State, regional/local), and insufficient dynamics in EU policy processes. A systemic approach to agriculture is needed that considers the whole interconnected system rather than isolated parts. The first version of F2F focused heavily on the supply side (i.e. farmers and food producers), while neglecting the demand side (i.e. consumers, markets, and structural incentives to shift consumption). A 'F2F 2.0' is needed to balance supply and demand side policies.


Environmental goals currently take precedence over social and economic sustainability aspects. Enhancing policy coherence is needed via a long-term commitment, alongside clear expectations and robust policy making skills. The incorporation of sustainability indicators and proofing is essential for translating sustainability commitments into concrete and coherent policies. Policy coherence is not just a technical exercise – it is a challenge that demands political will, strategic capacity and institutional innovation.

Comment améliorer la cohérence des politiques commerciales de l'Union européenne au regard des objectifs de développement durable des Nations Unies ?

 Au regard des objectifs de développement durable de l'Union européenne (UE), la cohérence des politiques vise à réduire les contradictions, à renforcer les synergies et à accroître l'efficacité des actions menées dans différents domaines de politique afin d'atteindre les objectifs fixés et de produire des résultats durables et cohérents. Deux projets de l'UE apportent des éléments probants sur la manière d'améliorer la cohérence entre les politiques de l'UE relatives au commerce agricole international et à la promotion des objectifs de développement durable. Trois principaux problèmes ont été identifiés : les limites de la cohérence au sein de la stratégie 'De la ferme à l'assiette' (F2F), les incohérences entre les niveaux de gouvernance (UE, États membres, régional/local) et le manque de dynamisme des processus d'élaboration des politiques de l'UE. Une approche systémique de l'agriculture est nécessaire, prenant en compte l'ensemble du système interconnecté plutôt que des éléments isolés. La première version de F2F était fortement axée sur l'offre (agriculteurs et producteurs alimentaires), négligeant la demande (consommateurs, marchés et incitations structurelles à modifier la consommation). Une version 'F2F 2.0' est nécessaire pour équilibrer les politiques relatives à l'offre et à la demande.

Actuellement, les objectifs environnementaux priment sur les aspects sociaux et économiques du développement durable. Il est nécessaire de renforcer la cohérence des politiques grâce à un engagement à long terme, des attentes claires et de solides compétences en matière d'élaboration des politiques. L'intégration d'indicateurs de durabilité et leur validation sont essentielles pour traduire les engagements en matière de durabilité en politiques concrètes et cohérentes. La cohérence des politiques n'est pas un simple exercice technique: c'est un défi qui exige une volonté politique, une capacité stratégique et une innovation institutionnelle.

Wie lässt sich die Kohärenz der handelsbezogenen EU-Politiken im Hinblick auf die Nachhaltigkeitsziele der Vereinten Nationen verbessern?

 Im Hinblick auf die Nachhaltigkeitsziele der EU zielt die politische Kohärenz darauf ab, Widersprüche abzubauen, Synergien zu stärken und die Wirksamkeit von Maßnahmen in verschiedenen Politikbereichen zu steigern, um die gesetzten Ziele zu erreichen und aufeinander abgestimmte, nachhaltige Ergebnisse zu erzielen. Zwei EU-Projekte liefern Erkenntnisse darüber, wie die Kohärenz zwischen den EU-Politiken im internationalen Agrarhandel und bei der Förderung von Nachhaltigkeitszielen verbessert werden kann. Dabei werden drei Hauptprobleme identifiziert: Kohärenzlücken innerhalb der „Farm-to-Fork“-Strategie (F2F), Inkonsistenzen zwischen den verschiedenen Governance-Ebenen (EU, Mitgliedstaaten, regional/lokal) und eine unzureichende Dynamik in den politischen Prozessen der EU. Es bedarf eines systemischen Ansatzes für die Landwirtschaft, der das gesamte vernetzte System und nicht nur isolierte Teile betrachtet. Die erste Version von F2F konzentrierte sich stark auf die Angebotsseite (d. h. Landwirtschaft und Lebensmittelproduzenten), während die Nachfrageseite (d. h. Verbraucher, Märkte und strukturelle Anreize zur Verlagerung des Konsums) vernachlässigt wurde. Ein „F2F 2.0“ ist erforderlich, um die Maßnahmen auf der Angebots- und Nachfrageseite in Einklang zu bringen.

Umweltziele haben derzeit Vorrang vor Aspekten der sozialen und wirtschaftlichen Nachhaltigkeit. Eine stärkere politische Kohärenz muss durch langfristiges Engagement, klare Erwartungen und fundierte politische Entscheidungsfähigkeiten erreicht werden. Die Einbeziehung von Nachhaltigkeitsindikatoren und die Durchführung von Nachhaltigkeitsprüfungen sind unerlässlich, um Nachhaltigkeitsverpflichtungen in konkrete und kohärente politische Maßnahmen umzusetzen. Politische Kohärenz ist nicht nur eine technische Übung – sie ist eine Herausforderung, die politischen Willen, strategische Kompetenz und institutionelle Innovation erfordert.

summary