

Internationaler Peer Review 2018 zur deutschen Nachhaltigkeitsstrategie

Stakeholder - Umfrage 17. Oktober 2017 – 1. Dezember 2017

Im Auftrag der Bundesregierung unterstützt der Rat für Nachhaltige Entwicklung derzeit den internationalen Peer Review 2018 zur deutschen Nachhaltigkeitsstrategie.

Die internationale Expertengruppe unter Leitung von Helen Clark hat sich Ende September 2017 erstmals getroffen und sich auf zentrale Fragestellungen ihrer Untersuchung geeinigt. Themenbereiche, die für die Peers von besonderem Interesse sind, sind folgende: Konsum und Produktion, Digitalisierung, Klimapolitik als Hebel, Zukunft der Arbeit, Finanzmärkte, Dringlichkeitsgefühl und science/policy interface, soziale Ungleichheit, SDGs als business case, internationale Verantwortung Deutschlands.

Die Peer Gruppe hat den RNE gebeten, relevante nationale und internationale Akteure in Deutschland um ihre Einschätzung zur Nachhaltigkeitsstrategie und zu den politischen Perspektiven zu bitten.

Die Ergebnisse dieser Umfrage werden der internationalen Expertengruppe als Basis für die Erarbeitung eigener Hypothesen dienen. Ende Februar 2018 wird die Peer Gruppe eine Woche in Berlin tagen und ihre Hypothesen mittels Experten-Anhörungen sowie in Diskussion mit Akteuren testen, um dann anschließend ihre Empfehlungen für die Bundesregierung zu formulieren. Der Arbeitsprozess ähnelt dem, der schon 2013 sowie 2009 den Peer Reviews zu Grunde lag. Die Fragen sind nicht für alle Akteure gleichermaßen relevant, der Transparenz wegen legen wir sie aber offen. Wenn Sie sich an der Umfrage beteiligen möchten, beantworten Sie gegebenenfalls nicht alle Fragen. Bitte geben Sie jeweils die Nummer der Frage an, auf die sich Ihre Antwort bezieht. Frist für die Teilnahme an der Befragung ist der 1. Dezember 2017.

Schließlich noch eine Bitte: Da die Arbeitssprache des Peer Review Englisch ist, bitten wir Sie um Beantwortung auf Englisch, soweit Ihnen das möglich ist.

Den Fragebogen senden Sie bitte ausgefüllt an: veronica.tomei@nachhaltigkeitsrat.de.

Preface

The following statements reflect the ongoing discussions within the RENN network and are a first preliminary result of various and in some cases extensive dialogue processes organized by three RENN (west, süd, mitte). These dialogue processes consisted of several conferences and workshops throughout Germany to discuss (among other topics) the German Sustainable Development Strategy (GSDS). Thus, this document includes ideas, opinions and views of representatives of civil society organisations, municipalities, scientific community as well as businesses. The following statements have therefore a wider basis than the opinion of the twenty partner organisations constituting RENN. Thus, not all opinions reflect positions shared by all RENN.partners to the same extend. However, as the composition and selection of arguments has been carried out by the RENN network it remains solely responsible for its content.

General Information	
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Which stakeholder do you represent or belong to (no ranking implied, multiple answers possible):	a) politics, b) administration, c) enterprise or the business community, d) the labour movement, e) academia, f) municipalities and associations, g) youth, h) gender interests, i) migration groups, j) the disabled movement, k) the churches, l) financial actors, m) the countries, n) grassroots initiatives or local agenda groups, o) civil society organisations
Have you sent in a contribution on the draft of the 2016 Sustainable Development Strategy?	No

Executive summary

Numerous scientific studies provide unambiguous evidence that we approach – and in several dimensions already exceed – the planetary as well as social boundaries. The urgency for action is emphasised by our knowledge of crucial "tipping points" for potentially irreversible damage or developments – such as climate change and species extinction. To achieve the vision and the goals of the Agenda 2030, we need to strive for a low ecological footprint and at the same time to achieve a high score on the human development index as minimum requirements for all countries. ²

Against this background, the German government has committed itself to implement the Agenda 2030 through its renewed German Sustainable Development Strategy (GSDS). It gained worldwide recognition for its advanced governance structure as well as the comprehensive goal system of the GSDS. However, the actual implementation of the ambitious strategy is lacking behind as we observe very little progress in achieving **political coherence** to promote sustainable development. Instead, political and administrative decision-makers seem to continue their (rather sectorially fragmented) "business as usual" approach.

We encourage the German government to more actively leverage on the Agenda 2030 to formulate innovative policies to promote sustainable development and to decisively implement these. By doing so, Germany would become a global role model to promote a truly integrated socio-ecological transformation. Specifically, we see three main areas that deserve particular attention: a) Governance, b) international responsibility of Germany, and c) specific policy areas for urgent action.

a) Governance

For promoting an integrated socio-ecological transformation, i) a stronger focus on **actual policy implementation** as well as ii) **horizontal and vertical integration** are of utmost importance.

- The 2016 revision of the GSDS already aims at greater coherence and the resolution of conflicting goals by considering **interdependencies**. However, potential goal conflicts and/or synergies have neither been identified nor been addressed systematically. As such, they are not considered in important implementation mechanisms such as the federal budget, taxes and other financial instruments. The sustainability impact assessment of new draft laws and regulations as well as the critical assessment of subsidies are promising instruments. Yet, the sustainability impact assessment should be extended to already existing laws, regulations as well as financial instruments. In addition, for both instruments consequences are unclear in case of non-compliance with defined goals towards sustainable development.
- ii) The successful promotion of sustainable development hinges on the close cooperation of the Federal Government with the Länder and municipalities. Yet, the picture is currently rather fragmented, as the GSDS at national level is complemented by a multitude of separate state-level and municipal sustainability strategies and governance structures. There is a need

¹ See for example Rockström et al 2019

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² As for example illustrated by the Global Footprint Network 2010

to **promote vertical integration** harmonize the different approaches across all levels.

The establishment of the Regional Hubs for Sustainability Strategies (RENN), following the explicit recommendation of the peers of the former International Review Process, marks an important step in that direction: The RENN hubs pool extensive expertise of civil society organisations, as some partners of the network draw on more than twenty years of experience in implementing the Agenda 21 and in developing and implementing strategies for sustainable development on the municipal and Länder level. RENN is therefore in a prime position to further promote vertical and horizonal integration and welcomes the opportunity to provide its expertise. Moreover, civil society organisations can act as indispensable allies for the implementation of the GSDS. They use their expertise to develop specific solutions, raise awareness, stimulate innovation for sustainable development and enable dialogue among different stakeholders. Their willingness to contribute to the implementation and improvement of the GSDS, however, depends on clear, transparent and binding procedures for participation, which should be accepted by all ministries. The mandates for these participatory elements need to be clarified to ensure the effective involvement of civil society.

b) International responsibility³

In parallel to promoting sustainable development at national level, Germany bears a strong international responsibility: The Agenda 2030 follows a universal approach and applies the principles and seventeen goals to developing, emerging and developed countries alike. In its national strategy, the German government explicitly acknowledges its responsibility by linking 63 goals to the seventeen SDGs. Out of the 63 goals, eleven newly defined ones explicitly relate to the international responsibility of Germany. However, we observe that several policies, political strategies and measures by Germany (and Europe) with a global impact (for example foreign, security, economic and agricultural policies) are still not coherent with the GSDS and the Agenda 2030. We therefore recommend conducting a comprehensive review of all policies by Germany (and Europe) with a global impact and strive for an alignment with the SDGs. Moreover, we like to encourage the definition of at least one sustainability postulate for each SDG addressing the international responsibility of Germany.

c) Specific areas in need of action

In terms of substantive areas for action, we would like to emphasise the following topics:

- We regret that Germany, despite its excellent starting conditions compared to other countries in the world, will very likely miss its climate goals. More determination is required to implement an energy transition through the expansion of renewable energies and the phase-out of coal.
- Agricultural turn around: As recent studies on flying insects have shown, the
 extinction of species in Germany has reached an alarming level. Although the
 reasons for the loss of insects are not fully clear, there is considerable evidence
 that current agricultural practices such as the excessive usage of pesticides and

³ See also Civil Society Reflection Group on the 2030 Agenda for Sustainable Develop 2016 & 2017

- herbicides as well as fertilizer significantly contribute to the observed loss in biodiversity of plants and thereby deprivation of habitats for insects. To stop these trends, there is a need for a decisive political agenda to steer a far-reaching agricultural turnaround towards sustainable agriculture.
- "Sustainable financing", "sustainable economy" as well as "education for sustainable development" should be included as additional fields of action into the GSDS.
- Finally, we like to draw attention to the following **off-track goals**, which demand for additional effort for their successful implementation: end poverty in all its forms everywhere (SDG 1) & reduce inequality within and among countries (SDG 10), take urgent action to combat climate change and its impacts (SDG 13) & ensure access to affordable, reliable, sustainable and modern energy for all (SDG 7), make cities and human settlements inclusive, safe, resilient and sustainable (especially development of the built-up area and transport infrastructure expansion and mobility) (SDG 11) as well as sustainable production and consumption (especially high energy consumption due to consumption) (SDG 12).

The below report provides an extensive assessment of the status quo, identifies avenues for further action in more detail and – to the extent possible – formulates specific proposals.

The state of play of the German Sustainable Development Strategy 2016 (Reference 1)

The German government is committed to implement the Agenda 2030. With the revised GSDS of 2016, the national goal system has been aligned with the global SDGs. Moreover, the German governance for implementing the SDGs has been reinforced by new structural components. As such, Germany gains international recognition for its efforts in implementing SDGs: According to scientific criteria as defined by the European Sustainable Development Network (ESDN) as well as the Organisation for Economic Co-operation and Development (OECD) and United Nations Development Programme (UNDP)⁴, implementation architecture of Germany meets high standards.

Despite these promising steps, we are of the opinion that the implemented structure and efforts will not suffice to achieve the defined goals by 2030. We believe that Germany misses the chance to take leadership in fully integrating the SDGs in day-to-day political decision-making in all sectors. By doing so, Germany could promote a real social-ecological transformation within Germany, act as a role model for other countries and trigger the necessary international dynamic to promote sustainable development. The German government should leave the path of incremental changes to the sustainability architecture but instead use the current window of opportunity to initiate, promote and undertake a comprehensive and inclusive transformation which does not just address the symptoms but the causes of unsustainable development. For this endeavour, we provide the following observations and suggestions:

1) Increase the political relevance of the strategy (reference 1.2)

The GSDS, including its structures and instruments as well as its goal system and its indicators, provides a promising basis to foster the needed vertical and horizontal integration of sustainability issues into day-to-day politico-administrative decision-making. It offers the chance for long-term planning focussing on goal achievements in 2030. In practice, however, we observe that political decisions are seldomly informed by the GSDS, but are instead taken on the basis of other (sometimes short term) policy considerations. Therefore, long-term strategies need to have priority over day-to-day tactical political strategies. Thus, we strongly suggest to more systematically integrate the GSDS in "ordinary" decision-making, turning the GSDS into the central steering and overarching planning instrument of German policies.

2) Strive for a better cohesion of political decision-making (reference 1.2)

The revised GSDS emphasises that it strives towards a greater policy coherence and the resolution of conflicting goals considering the substantial number of systemic interdependencies. While we support this ambition and appreciate the improvements made to date, the current strategy leaves further room for improvement in terms of political cohesion: We still observe the implementation of policies even though they contradict the goals defined in the strategy (as for example the "Bundesverkehrswegeplan" which impedes the needed transformation in the area of mobility).

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⁴ OECD & UNDP 2002: S. 33, 34; ESDN (o.J.)

In addition to the divergence of the day-to-day policy-making from the goals, the internal cohesion of the strategy could be further improved in the following four areas:

Constitutional status

Since 15 November 1994, environmental protection has been preserved as an objective of the state in Article 20a of the German Basic Law. Constitutional status has thus been afforded to environmental protection and its objectives. All state bodies - in particular the legislature - are required to be "mindful also of [their] responsibility toward future generations" and to protect the environment. We strongly support the idea to extend this paragraph and also elevate sustainable development to constitutional status (which has been already been scrutinised with a legal option instructed by the German Council of Sustainable Development⁶).

Definition of sustainable development

Within the introductory chapters of the GSDS, the basic aims and principles are presented. In that context, the concept of sustainable development is defined as "the guiding principle" for the current legislative period and the strategy as such. We appreciate the explicit link of the concept of sustainable development to the planetary boundaries (as "save operating space") together with the objective of a life in dignity for everyone. However, the concept of the three dimensions of sustainable development (triple bottom line) is still included in the definition of sustainable development and its role remains unclear. This is particularly important, as it might be in contradiction to the clearly defined boundaries. For the definition of sustainable development, we therefore recommend to solely relate to the concept of the planetary boundaries of the earth together with the objective of a life in dignity for everyone forming the ultimate constraints for political decisions.

Goals and targets

With the renewal of the GSDS, the goal system experienced a substantial expansion: 63 indicators and respective goals now cover a great range of relevant policy fields. The strategy would, however, benefit from a more comprehensive elaboration of their interlinkages, such as synergies and goal conflicts. Such a transparent approach might be instrumental to reap synergies and to resolve and negotiate goal conflicts (see also "The governance approach and structure").

Implementation measurements

The GSDS elaborates on the Federal Government's (ongoing and planned) activities to implement each of the defined goals. We appreciate that goals and indicators are already linked to concrete activities. Yet, the approach could be further improved by paying attention to potential synergies and conflicts among different measurements. Moreover, it is currently unclear which of the mentioned activities are already being implemented (and in how far they contribute to the

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⁵ Deutscher Bundestag 2015: Article 20a, page 27

⁶ Wieland 2016

achievement of the goals) and which ones are future activities. To improve clarity, we therefore recommend to not elaborate on all running activities which relate to a certain topic but to solely describe measurements which have been adapted, intensified or have been newly introduced to reach the defined sustainability goals.

Linkage of public finances to the sustainable goal system

To ensure sustainable development, the concept of sustainability needs to become a key principle in public budget allocation. We need to overcome the idea, that sustainable development is an add-on to existing tasks and expenditures – it needs to be an integral part of every decision and disbursement. In our view, public budgets are an effective means to translate political decisions on sustainable development (SDGs, Paris Agreement, GSDS) into administrative and economic reality and increase political coherence. Therefore, we appreciate measures taken so far, such as the consistency-check of public subsidies with development goals implemented in 2015. We encourage public authorities to intensify their efforts to align public budgets with the GSDS - covering both revenues (such as taxes) and expenditures (such as subsidies, other incentives). In this context, it is crucial to not just link individual goals to the budget, but also to consider the interlinkages and potential goal conflicts. This integrated/inclusive approach is warranted to ensure that public action is oriented towards the ultimate goals of staying within the planetary boundaries, and ensuring a life in dignity for everyone. Such approaches are already being tested by the municipalities of e.g. Freiburg, Cologne and Kreis Unna (district in North Rhine Westphalia).

3) Pay more attention to the international responsibility of Germany⁷

The Agenda 2030 follows a universal approach and applies the principles and seventeen goals to developing, emerging and developed countries alike. In its national strategy, the German government explicitly acknowledges its responsibility by linking 63 goals to the seventeen SDGs. Out of the 63 goals, eleven newly defined ones explicitly relate to the international responsibility of Germany. However, some measures by Germany with a global impact do not seem to be fully reconciled within the German goal scheme: Germany's export of weapons, for example, conflicts with the goal concerning practical action to combat the proliferation of (especially small) arms. To further increase the coherence of the GSDS, we suggest the following:

- a) In order to stress the international responsibility of Germany: the GSDS should include at least one sustainability postulate for each SDG which address the international responsibility of Germany;
- b) conduct a comprehensive review of all policies, political strategies and measures by Germany (and Europe) with a global impact (for example foreign, security, economic, agricultural and fisheries policies) with regard to their coherence with the GSDS and the Agenda 2030,

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⁷ See also Civil Society Reflection Group on the 2030 Agenda for Sustainable Develop 2016 & 2017

c) and set up goals to reduce the negative and to enhance the positive impact of these policies.

4) Improve measurement and reporting mechanisms

The GSDS entails a broad set of instruments to support its implementation, evaluation und reporting. While these instruments have been further improved in the revised strategy of 2016, additional enhancements could contain:

Sustainability indicators and goals

We appreciate the revised goal system in the 2016 GSDS, as it largely maintains the previously established set of goals (except for three) and complements these with new goals to more systematically incorporate the newly developed SDGs. While this new set of goals and indicators forms a helpful tool for promoting sustainable development, we encourage the following amendments:

- While acknowledging the importance of a comprehensive set of indicators (and respective goals), some do not seem to generate valuable additional information on sustainable development. For example, the new indicators for "land use" (loss of open space; settlement density) are based on the same data as the "expansion of built-up area and transport infrastructure" and therefore hardly provide new insights. Instead, indicators on the qualitative aspects of land use (for example the ecosystem services or the general value in terms of biodiversity) would be more meaningful. We therefore suggest choosing indicators according to their informational surplus.
- Moreover, some indicators at national level do not seem to fully reflect the thrust of the respective global SDG. While the translation of the SDG into a comprehensive yet parsimonious and practical system is difficult to achieve, the transposition of several SDGs could be improved (please also see the separate section below on "6. Pay more attention to the following topics"):

SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

- ➤ The GSDS emphasises the role of government debt and defines three indicators. Government debt, however, is neither mentioned within the respective SDG nor in others.
- ➤ Employment in the GSDS is only represented in quantitative terms (employment rates). Qualitative aspects of employment, such as the amount of jobs subject to social insurance are not depicted.
- The GSDS defines the indicator "number of members of the Textile Partnership" to measure decent work worldwide. While the "Textile Partnership" is a welcome initiative to promote decent work conditions worldwide, the mere number of members in this partnership does not adequately

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⁸ In response to the tragic accidents in textile factories, the German Federal Minister for Economic Cooperation and Development Dr. Gerd Müller initiated the foundation of the Textiles Partnership in 2014.

represent the state of affairs in the global value chains (not least since the partnership does not formulate and enforce minimum standards).

- Moreover, as described above, we like to encourage the German government to define sustainability postulate, goals and indicators for each SDG which reflect the international as well as national dimension of sustainable development. Goals such as reducing poverty, hunger, health, inequality and many other also require Germany's international efforts and should therefore also be mentioned within the German goal system.
- In some instances, modifications to the goals of certain indicators ("goal displacement") pretend significant improvements although actual progress has only been limited: Illustrative examples of such goal displacements include the extension of the timelines to achieve specific goals, for example the extension of the built-up areas and transport infrastructure, species diversity, share of expenditure for official development assistance in gross national income. Due to the goal displacement, the evaluation of the Federal Statistical Bureau changed to a more positive result although actual progress has been limited. We therefore recommend to increase transparency on how the goals in the GSDS are set, provide explanations in case of needed changes and to elaborate on remedial actions to be considered if a goal is missed.
- Furthermore, the German Government should not make the inclusion of an "sustainability postulate" conditional to the availability of indicators and data for evaluating progress. Indicators and the needed data might be developed in a second step. The definition of "sustainability postulates" should be specified on the basis of their relevance for sustainable development.
- The definition of some goals does not completely adhere to the SMART criteria. Partly, quantification and timelines are missing and should be added.

Assessment of the German Federal Bureau of Statistics

The German Federal Bureau of Statistics assesses the government's performance against each of the 63 indicators and the written assessment of the development of each indicator is complemented with a graphic. Moreover, the development of the indicator over time is pictured and put into a statistical context. The used "weather symbols" are intended to "enable a fast assessment of the development of the respective indicator". We generally appreciate the comprehensive information on the development of each individual indicator. Yet, the symbols are often misleading:

a) The evaluation of the German Federal Bureau of Statistics refers to the development of an indicator over the last five years. It provides a positive assessment of an indicator (symbol of the sun) if the respective goal will be reached by extrapolating the latest development. However, this linear

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⁹ German Federal Statistical Office 2016

- extrapolation of the five last years might often be unrealistic, as the "low hanging fruits" have already been picked and further progress might slow down and become more challenging.
- b) Even though the German Federal Bureau of Statistics is clear on its methodology, the weather symbolism can be perceived as misleading as it seems to indicate the current status of an indicator. In workshops and discussions, we became aware that the "sunny symbol" is often interpreted as already having achieved a sustainable state regarding an indicator.

For more clarity, we therefore encourage to revise the methodology according to this perception. We recommend two symbols, one indicating the current status in terms of sustainability, the other indicating the recent trends.

Sustainability checks for proposed legislation & subsidies

The German government implemented a systematic check of proposed legislation by 2008 and introduced a sustainability check for subsidies based on the goal system in 2015. We appreciate both mechanisms for reporting and implementation. However, we see the following room for improvement:

Sustainability check - subsidies

The last check of subsidies conducted in 2015 came to the conclusion that for every subsidy a link to one sustainability goal could be identified. However, it also concluded that some subsidies may conflict with goals in terms of their ecological, social and economic effects. To improve the steering effect of the GSDS towards a more sustainable development, we encourage an inclusive subsidy check that a) focusses on potential goal conflicts (by indicating the goals conflicting with each subsidy), and b) triggers remedial follow-up action in case of such conflicts.

Sustainability check – law proposals

We welcome that a formal sustainability check according to the guidelines of sustainability are an integral part of the regulatory impact assessment since 2009. Moreover, we strongly support the recent proposal that the mandate of the German Parliamentary Advisory Council on Sustainable Development (Parlamentarischer Beirat für Nachhaltige Entwicklung) should be expanded beyond a mere formal review to also include a content review regarding sustainable development. The content review should systematically check the progress made in 2017 on the entire set of the sustainability goals defined in the revised strategy. It should also identify and address potential goal conflicts and propose remedial measures. The assessment process as well as the final results of the review should be transparent and publicly available. Stakeholder consultations could help to inform the decisions of the Advisory Council.

¹⁰ German Federal Ministry of Finance 2015: http://www.bundesfinanzministerium.de/Content/DE/Pressemitteilungen/Finanzpolitik/2015/08/2015-08-26-PM31.html (last access 28.11.2017)

The currently proposed sustainability check only relates to new law proposals. We therefore suggest extending the scope and systematically apply the sustainability check to all existing laws and regulations.

5) Pay more attention to the following topics (reference 1.1 "identified gaps")¹¹

Sustainable finances / financing

Within the sustainability discourse, sustainable finances / financing has been mainly defined as "consolidating public finances" (often referring to the concept of "intergenerational justice"). The consolidation of public finances has thus been defined as a goal in the GSDS as well as in several strategies of the Länder and municipalities. However, we would like to encourage a broader perspective on sustainable finances:

Public finances and the dominance of the "black zero"

We agree that the consolidation of public finances is important given the alarming debt level of many public authorities. At the same time, the worldwide transformation towards a sustainable development requires considerable investments (regarding new infrastructure for energy, mobility, digitalisation etc). In addition, recent austerity measures (such as cutting expenses in social services, education, etc.) might cause social imbalances and endanger social cohesion. Therefore, public authorities have to commit the necessary investments to promote the required transformation towards a sustainable economy and to safeguard social coherence. The current low interest rate environment provides public authorities with a promising window of opportunity to achieve these goals.

Moreover, public authorities such as the German government, the Länder and municipalities command funds, special assets and reserves (for example for civil service pensions). Sustainability criteria already inform the investment of some of these resources. However, sustainability criteria should become guiding principles for all public financial investments. This has also to be considered for redistribution of income between Bund, Länder and municipalities (Länderfinanzausgleich) (i.e. by means of a bonus and malus-system) and the allocation of subsidies, as they could have a strong steering function for sustainable development.

Furthermore, to attract capital for sustainable development, authorities have also already used promising instruments such as "green bonds". As the first public green bonds attracted wide interest, green bonds might encourage further funding for sustainable development (see for example the Sustainability Bond of the State or North Rhine-Westphalia¹²).

¹¹ Please refer also to "New opportunities and challenges" (reference 3.1, 3.2, 3.3), page 26ff

¹² Ministry for Climate, Environment, Agriculture, Conservation and Consumer Protection of the State of North Rhine-Westphalia https://www.nachhaltigkeit.nrw.de/projekte/sustainability-bond/ (last access 28.11.2017)

The role of the private financial sector in financing the transformation: The financial sector plays a strategic role for the socio-economic transformation."13

In practice, however, parts of the financial sector hardly fulfil this role: Neither does the financial sector systematically incorporate risks related to climate change and the socio-economic transformation into their management, nor is sufficient capital allocated to projects promoting sustainable development. In essence, the financial sector does not seem to effectively contribute to promoting sustainable development. In light of these observations, we recommend to

- a) intensify the dialogue with the financial sector to promote the financing for sustainable development;
- b) check the consistency of current financial market regulation with the politically agreed-upon path for sustainable development and to align existing rules where necessary;
- c) start a more general reflexion on the usefulness and/or negative consequences of some financial products and practices for sustainable development and
- d) implement a financial transaction tax as a mean to draw on the financial sector for funding sustainable development and at the same time contribute to a stabilisation of markets. At the end of 2016, ten European countries agreed to the introduction of such a tax, but the final decision-taking was postponed. We therefore recommend to resume negotiations.

Sustainable economy

For a socio-ecological transformation we also need to strive for a re-orientation of economy towards sustainability so that it contributes to the realisation of the politically agreed-upon goal system and prioritizes social and often environmental considerations over private economic interests and profit orientation. This re-orientation will require responsible regulation by policy makers.

Economic growth

Within the GSDS economic growth (GDP per capita) serves as an indicator for sustainable development. Yet, there is an ongoing critical debate about economic growth and its contributions to sustainable development (see for example "The German Enquete Commission on growth, prosperity and quality of life"). Several studies question the possibility to decouple growth from resource and energy consumption¹⁴. Moreover, alternative indicators such as welfare indices have been recommended in the debate as more meaningful and holistic instruments to approximate sustainable (economic) development. Thus, we like to encourage to include such an indicator instead of economic growth.

¹³ See for example: Discussion paper/living document by Alexander Bassen et al., Last updated: 15 March 2017

¹⁴ See for example Jackson 2017, Paech 2012

Sustainability Reporting

Public interest on the sustainability performance of companies is increasing. As financial reporting according to accounting standards is mandatory, reporting on the sustainability performance is voluntary. Moreover, we have to cope with a vast set of reporting standards of sustainability indicators. We appreciate that in December 2014, the recently adopted "Directive on disclosure of non-financial and diversity information by certain large companies", amending the 2013 Accounting Directive, entered into force. Member states now have two years to transpose it into national laws, and it is expected that the first company reports will be published in 2018 covering financial year 2017-2018. We appreciate that Germany now translated the directive into German law. However, the "CSR-Berichtspflicht" is only mandatory for about 550 companies in Germany and leaves room for interpretation which information has to be disclosed (i.e. does explicitly require reporting on supply chains). Moreover, companies do not have to validate the disclosed information. Thus, we encourage to further amend the "CSR-Berichtspflicht" to non-capital market oriented companies as well as companies with less than 500 employees and set clear reporting standards which clearly include the supply chains of a company.

Circular Economy

To develop our economy towards a circular economy it is of utmost importance to minimize resource consumption. By keeping resources as long as possible in the circle of use and reuse we can reduce the use of new (and sometime more and more scarce) resources. With the already 1996 enforced Circular Economy and Waste Law, Germany was a frontrunner. However, we are still far away from reaching a circular economy in our country. The further improvement of this law should focus on reducing waste sources from the beginning (e.g. by less packaging or prolonging the lifespan of products), increasing recycling quota and fostering upcycling instead of just recycling (which often means "energetic recycling" - burning waste to generate energy or heat).

Social and solidary economy (SSE)

Within the last years, we have experienced a rediscovery and revival of alternative forms of enterprises such as cooperatives, associations and community-based businesses. Some of these businesses base their business practices on social innovations such as sharing, lending or repairing. The term SSE as defined by the United Nations Research Institute for Social Development "covers a diverse range of organizations and enterprises that prioritize social and often environmental considerations over private economic interests and profit orientation; involve forms of management or governance which are more horizontal and democratic; and are often linked to forms of collective action and active citizenship." We suggest to pay more attention to these entrepreneurial concepts to promote sustainable economic development. In order to promote new start-ups for sustainable development and enable their advancement (out of their niche), we encourage to set up funds for which start-ups can pitch with sustainable business ideas.

¹⁵ United Nations Research Institute for Social Development (UNRISD) 2016: 17

International Trade Politics in contrast to sustainable development
Since the temporary suspension of negotiations over the Transatlantic Trade and
Investment Partnership (TTIP) and the initiation of the Comprehensive Economic
and Trade Agreement (CETA) ratification, the latter came into the limelight. One
of the most controversial clauses pertains to the exclusive and unilateral right
allowing transnational corporations to sue governments before private arbitration
tribunals for losses incurred following a change in legislation. Although CETA
declares that 'the right to regulate within their territories to achieve legitimate
policy objectives' is guaranteed to the states in order to reconcile investment
objectives with environmental and social principles, any possibility of standing in a
tribunal with looming colossal indemnities might paralyse any action from
governments. Moreover, given the strong presence of US companies in Canada,
they could realise, via CETA, a substantial part of TTIP's objectives. Taking into
consideration that the CETA has still to be ratified by national parliaments, we
recommend to not ratify CETA to retain full governmental ability to act.

Education, education for sustainable development and participation (SDG 4)

Within the GSDS the German Government explicitly names education to be a crucial factor that decides on people's opportunities to develop their individual skills, realise their professional aims, participate in and shape their society. Thus, education is a human right."

However, the potential of education in general - formal and non-formal – has not been exhausted to reach the SDGs and work on acceptance of the concept of sustainable development within the whole society. As education and participation is named within several targets of the SDGs (for example 11.3 "Enhance (...) the capacity for participatory, integrated and sustainable human settlement planning and management (...)") we encourage to incorporate education within the relevant targets of the GSDS.

Moreover, the strategy explicitly addresses SDG target 4.7 "Education for Sustainable Development" and emphasises the importance to "anchor education for sustainable development (ESD) in the structure of all educational areas in a targeted fashion". Furthermore, ESD has been defined as one of the "Sustainability Management System Rules". We appreciate this endeavour and recommend for its implementation that the GSDS focusses more on already existing strategies and plans, as for example the "Nationaler Aktionsplan Bildung für nachhaltige Entwicklung" (NAP BNE). This action plan was developed by a multiplicity of civil stakeholders from NGOs, churches, science, and contains 130 aims and more than 300 actions. Its aims to not only concern education for sustainable development in schools. But moreover, they concern topics like sustainable cities, youth and public participation in the development of sustainable strategies on all levels, whole institutional approaches or education for "world citizenship".

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¹⁶ German Federal Government 2016: 82

With the implementation of the NAP BNE Germany could become a leader in transferring the World Action Plan - Education for Sustainable Development" in practice and serve as a positive role model for other countries.

Moreover, we appreciate the effort that the German Government decided to include a specific indicator and goal on education for sustainable development. However, this indicator needs to be developed in cooperation with civil society, NGOs, education institutions (formal, and non-formal) and science.

Science and Research for sustainable development

RENN discussions and workshops show the need for transformative science and sustainability science and research, defined and provided by for example the Wuppertal Institute: "Transformative research contributes to solving societal problems and is characterised by an explicit aspiration to get involved: The aim is to catalyse processes of change and to actively involve stakeholders in the research process. In this way, transformative research generates "socially robust" knowledge needed for sustainability transitions. Research should thus follow a transdisciplinary concept of knowledge: it does not only serve to generate "systems knowledge" (e.g. technological or resource-oriented systems analysis), but also integrates stakeholders in the process of generating "target knowledge" (visions and guiding principles) and "transformation knowledge" in concrete settings of urban or sectoral transitions to sustainability." 17

6) Reflect on and pay more attention to the off-track goals and targets (reference 1.4)

As outlined above, the weather symbols do not always allow to judge the state of sustainability in Germany (see page 8). For this reason, please find below a set of developments we identify as critical, although they are officially depicted as rather positive ("sunny" or "half-cloudy"):

End poverty in all its forms everywhere (SDG 1) & reduce inequality within and among countries (SDG 10)

The German Federal Bureau of Statistics evaluates the development of poverty and the distributive justice as "heading into the right direction" (half-cloudy symbol). Germany might indeed meet its goals on the respective indicators. However, we are of the opinion that Germany's goals to reduce "material deprivation", "severe material deprivation" as well as "gini income coefficient after social transfers" lack ambition: They are set to merely reach a level significantly below the EU-28 average by 2030. In light of the economic strength of Germany, these targets seem under-ambitious. Moreover, statistics show that the absolute size (and relative share) of the low-income segment (which are often not eligible to social welfare and thus in danger to live in poverty after retirement) in Germany is still increasing, causing a high poverty rate among employed people (increase of 100% between 2004 and 2014). In addition, we suggest that the "gini wealth coefficient" is more meaningful compared to the "gini income coefficient after

¹⁷ Wuppertal Institute (o.J.) https://wupperinst.org/en/research/transformative-research/ (last access 28.11.2017)

¹⁸ Spannagel et al. 2017, see also Paritätischer Gesamtverband 2016

social transfers" as wealth provides a more holistic approach to available funds and savings are an important security in times of personal crises.

Take urgent action to combat climate change and its impacts (SDG 13) & Ensure Access to affordable, reliable, sustainable and modern energy for all (SDG 7) Germany has already stepped into the challenging task of implementing an energy transformation – above all by promoting renewable energy, e.g. with feed-in tariffs, and a 2014 launched National Action Plan on Energy Efficiency – and as well has set itself ambitious emission reduction targets in the context of the internationally adopted Paris Agreement. The GSDS is referring to these frameworks but unfortunately not to the most recent strategy by which Germany wants to fulfil its commitments: the Climate Action Plan 2050¹⁹. This plan was adopted in November 2016 and therefore it was too late to integrate it into the GSDS, as the latter was in the process of being adopted by that time, too.

The Climate Action Plan 2050 is much more precise about the pathways and milestones leading to a development according to the Paris Agreement. Especially important is that the Federal Ministry of Environment succeeded in defining sectoral targets as well, so it provides guidance and strategic measures for all areas of action: energy, buildings, transport, trade and industry, agriculture and forestry. Covering all sectors is vital, because contributions to emission reduction towards a 1,5°C-compatible pathway and the self-imposed targets especially by transport and agriculture have been very low so far.

Therefore, the goals and indicators defined for SDGs 7 and 13 in the GSDS have to be aligned with the Climate Action Plan 2050. Moreover, as all countries have to raise their climate action ambitions progressively to stay well-below a 1,5°C temperature limit, this incremental ambition mechanism has to be reflected in the GSDS, too.

Another important challenge Germany is facing is the phase out of coal. The GSDS is only mentioning that there has to be a switch from fossil to renewable energies and the Climate Action Plan 2050 is not getting explicit about the date of a coal phase-out, however, acknowledging that it has to be organized in a planned and social just way. But to be able to reach the agreed target of becoming carbon neutral by 2050, a coal phase-out is necessary by 2030 and has to be initiated now, launching a broad multi-stakeholder process to avoid social unrest by job losses and disruptive transformations in the affected regions. Moreover, to be able to fulfil its emission reduction goal for 2020 (-40% CO₂ emissions), Germany has to shut down the 20 worst emitting coal-fired power units already by 2020. As Germany is producing more power than it needs domestically (in 2016 the country exported around 50 billion kWh which comprises about 8% of the German power consumption.²⁰), these shutdowns would not provoke black-

¹⁹ German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB): 2016

²⁰ Fraunhofer Institut für Solare Energiesysteme; for more data on power export rates see as well https://www.energy-charts.de/ (last access 28.11.2017)

outs in our power supply, but significantly reduce the export rate (and by that reduce CO₂ emissions).

In recent years, Germany did not manage to significantly further reduce its CO₂ emissions, on the contrary, recent projections suggest that emissions are even increasing again.²¹ Apart from the export-oriented power production, another reason is the above mentioned complete failure of the transport sector to reduce its emissions – that is why sectoral reduction targets are so important and a transformation of the mobility sector is mandatory (see as well the paragraph about mobility above). Another reason is that the EU Emissions Trading System (ETS) is failing to incentivise emission reduction because emission allowances are too cheap. Therefore, we urge politicians to re-fit the ETS by putting a higher price (at least 30 Euro) on allowances, or to establish another CO₂ pricing instrument to induce emission reduction, like a carbon tax.

Make cities and human settlements inclusive, safe, resilient and sustainable (SDG 11)

Development of the built-up area and transport infrastructure expansion

Even if we saw a reduction over the last years, in Germany every day about 70 ha of land is still converted into built-up areas and transport infrastructure. To a substantial extent, agricultural land and especially grassland with high ecological value (in terms of biodiversity) are converted. Since 2012, the extension of transport infrastructure is the main cause for the conversion of land. The German government commits itself to a reduction of this trend towards a conversion of 30ha/ day in 2030. With the renewal of the German Strategy, the timeline to achieve this reduction ("goal") has been prolonged from 2020 to 2030. Despite the limited progress, this shift has resulted in a more positive assessment in the most recent evaluation by the German Federal Bureau of Statistics ("sunny symbol").

We do not share this assessment, as the current trend does not seem to describe a sustainable path. Stronger efforts to stop the conversion of land are required, setting the goal towards a conversion of 0 ha/day or even less. In this light, we appreciate the comprehensive offers to municipalities within the Federal-Länder programmes for the promotion of urban planning and village development and other support programmes. However, a reversal of the current trend requires additional efforts. In this regard, we like to point to the fact that German municipalities generate a major share of their income through business and real estate transfer taxes and have therefore considerable interests to convert land into housing areas or industrial real estate. This is a clear example where the financial and overall economic interests of municipalities (shaped by incentive structures such as tax regimes) conflict with the sustainability goals defined in the GSDS.

Thus, we encourage a structured dialogue with the Länder and the municipalities how the conversion of land can be reduced. To overcome perverse incentive structures, this might also encompass new rewarding systems to save or even unseal space.

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²¹ UBA 2017

Moreover, as already mentioned above, we would appreciate to define an indicator and goal for the unsealing of space as well as more qualitative indicators on land use /development.

Mobility

The indicators "final energy consumption in freight transport and passenger transport" show that mobility is one of the major challenges in Germany. First, it causes about 18% GHG emissions (2015)²². Second, it is an important factor for land use change in Germany as it causes the conversion of land to transport infrastructure. Finally, we experience a broad range of health issues due to accidents and air pollution.

The negative trend will continue if sustainable transport solutions are not systematically pursued in a comprehensive manner. Sustainable mobility solutions can transform cities into places for healthy living, research and innovation, and efficient production. Green logistics help improving the efficiency of production and trade whereby reducing the negative footprint of transport.

Transformation goals:

- The effective integration of different modes of transport, including multimodality in logistics
- the re-emergence of walking and cycling as safe and viable modes of transit
- the reorganization of the public transport sector to an efficient, comfortable and affordable alternative to motorised private transport
- the continuous development of progressive regulations to support sustainable mobility
- the development of efficient propulsion systems

Change areas:

- Cities play a major role in fostering sustainable mobility solutions. German cities are deploying a broad range of tools and measures to tackle air pollution, to improve access to services and to enhance safety.
- Smart mobility such as carsharing and bikesharing is a promising new element in the mobility landscape, offering flexible and attractive alternatives to the motorised private transport. Shared mobility allows for a more efficient use of vehicles, and can reduce the cost of private car ownership.
- Integrated networks of long-distance and regional trains, as well as trams and busses are backbones of mobility and therefore need to be strengthened.
- Due to different settlement densities in rural and urban areas, there is a need to develop adequate mobility concepts which correspond to the respective regional circumstances. Especially the mobility in rural areas needs to be addressed.
- An effective leverage to reduce motorised transport and thus simultaneously emissions, is the deflection of traffic on railways.

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²² UBA 2016

Sustainable Production and consumption (especially high energy consumption due to consumption) (SDG 12)

The SDSD states that the "SDG 12 aims to achieve the necessary change to our ways of life and business."²³ However, comparing the targets of SDG12 to the indicators given as well as the described measurements in the GSDS, we fear that we will miss the required transformation as only a fragment of the targets is addressed within the GSDS.

Measures by the Federal Government to implement SDG12

Since February 2016 the National Programme for Sustainable Consumption and Production is part of the GSDS which is named to be the central programme to translate the GSDS into action. However, as the status, impact and validity of the listed measures for its implementation are unclear – they cannot be relied on to define the state of implementation of SDG12 in Germany. Moreover, a new institution, the Centre of Competence for Sustainable Consumption and Production was founded. We understand the potential to support the implementation of targets, however its definite role and mandate is unclear.

Consumers call for reasonable prices that reflect the true cost (and value) of a product. Consumers also call for more transparency when it comes to Quality Labels ("Gütesiegel"). The platform "siegelklarheit.de", a measure listed in the GSDS to achieve SDG12, offers an overview of existing Quality Labels in Germany. Though this might be an attempt to raise awareness and ensure clarity, there is still not enough effort undertaken to increase transparency and identify those Quality Labels that do not substantially contribute to a sustainable development. The Federal Government should aim for more transparency and should establish a valid and reliable labelling system which offers an easy-to-understand basis for decision-making if to buy or not to buy a product.

All in all, there is a need to clarify validity and impacts of measures listed in the GSDS.

Indicators in the GSDS

The indicators chosen to show the implementation of SDG12 in the GSDS are limited to only three. Moreover, we see further improvement to increase their meaningfulness relating to progress in implementing goal 12:

- The indicator "market share of goods certified by independently verified sustainability labelling schemes (future perspective: market share of products and services with trustworthy and ambitious eco- and social labels") has two major short-comings: 1) the proposed labels are only applied to certain product groups and thus ignore a great range of products. 2) high costs and a low demand for labelled products (i.e. with the "Blauer Engel") abstain companies from a certification. Moreover, instead of focussing on individual consumer decisions (as proposed by the indicator) we recommend focussing on improving production processes of consumer products (see also comments on EMAS).
- The (title of the) indicator "Energy consumption/CO₂ emissions from private household consumption" is misleading as it seems to shift the responsibility from the producer to the consumer. The energy consumption of private households is

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²³ German Federal Government 2016: 166

- caused by heating, the consumption of fossil fuel for mobility (directly) and by the consumption of goods (indirectly). However, private households have limited possibilities to influence their energy consumption (as many citizens live in rented accommodation without adequate insulation and by products of which they cannot influence the production processes of products).
- The third indicator EMASeco-management refers a) to the number of organizations which voluntarily registered for EMAS in Germany and b) their employees. In both instances there has been very little progress within the last years. Moreover, the management system EMAS only refers to ecological indicators and ignores the social dimension of sustainability. We therefore recommend making EMAS, or a variation of EMAS certificate mandatory for all enterprises. The CSR-Reporting Commitment ("CSR-Berichtspflicht") corresponding to the German Sustainability Codex for large enterprises, mandatory in Germany since 2016, and the share of companies particularly small and medium sized enterprises that deliver sustainability reports on a voluntary basis could be taken into account for also reporting on the social responsibility of companies. Moreover, the state of implementation of the "National Action Plan for Business and Human Rights" could be another suitable indicator.

The multitude of starting points listed in the GSDS stresses the complexity of the field of sustainable consumption and production. This complexity can neither be met by the bunch of measures listed in the GSDS nor by the indicators chosen. Furthermore, it is recommendable to improve the political cohesion regarding this topic. Particularly, the Federal Ministry of Economics should take up its responsibility support-sustainable businesses and address social implications caused by a lack of respect towards labour standards set by the ILO.

Biodiversity / Species diversity (SDG 15)

Recent studies show a loss of more than 75% of flying insects in North Rhine-Westphalia within the last 27 years. A similar development is observed in other regions in Germany. The ecological and economic consequences are far reaching. At the same time, we observe an alarming loss of several other species. For Germany, the Red List of endangered species shows a dramatic decrease in biodiversity. Although the reasons for the loss of insects are not fully clear, there are considerable hints that current agricultural practices such as the excessive usage of pesticides and herbicides as well as fertilizer contribute to the observed loss in biodiversity of plants and thereby deprivation of habitats for insects.

Moreover, agricultural practices have an important effect on other key goals and indicators defined for the GSDS, such as the high levels of nitrogen and phosphors in floating waters, ground water as well as the soil (SDG 2, 6), nutrient inputs in coastal waters and marine waters (SDG 14) as well as climate change (SDG 13). Most of these goals are also "off-track" and need more ambition in their implementation. To stop these trends, there is a need for a decisive political agenda to steer a far-reaching agricultural turnaround towards sustainable agriculture.

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²⁴ Hallmann et al. 2017

²⁵ Bundesamt für Naturschutz hhttps://www.bfn.de/themen/rote-liste.html (last access 28.11.2017)

The governance approach and structure (Reference 2)

As mentioned above, the German sustainability architecture (governance system for sustainable development) is widely renowned for the comprehensive institutions and mechanisms, which help to further develop and implement the goals of the strategy. This architecture has been continuously refined. Major suggestions and recommendations resulted from the previous International Peer Review processes. One of the major findings of the last International Peer Review was that the horizontal and vertical coordination of the GSDS needs further improvement.

In light of this recommendation the German government designed and implemented additional elements of the sustainability architecture for an improved coordination of measures for sustainable development between the Federal Government, Länder, municipalities, the scientific community and civil society as well as a stronger cross-sector and intra-department cooperation (such as a regular dialogue format "Sustainability Forum" ("Forum Nachhaltigkeit") which also should allow the greater involvement of social stakeholders in the preparation of meetings of the State Secretaries' Committee, the launch of a platform on which scientific support ("Wissenschaftsplattform") for the implementation of the SDGs will be pooled, the implementation of sustainability coordinators for each ministry ("Ressortkoordinatoren Nachhaltigkeit") as well as the launch of the Regional Hubs for Sustainable Development (RENN)). We appreciate the implementation of the new structures and mechanisms which already show an improvement in terms of the horizontal and regional coordination. Thus, the work of the Regional Hubs shows already considerable improvement of cross-level, cross-country and cross-actor dialogues.

7) A clarification on mandates and coordination of new formats is needed (reference 2.1 & 2.3)

Civil society has a crucial role in initiating new cross-actor alliances and partnerships for sustainable development and in stimulating a broader interest among important multiplicators within society regarding the implementation of the GSDS. By informing these actors about the GSDS (especially those who haven't seen themselves as relevant actors and contributors to sustainable development) and inspiring and shaping new networks, RENN actively contributes to this process. For this endeavour, it is important to show that the GSDS really initiates a socio-ecological transformation, has a strong political relevance and enables civil society to contribute.

However, despite the essential support of the new formats to participate in the further development and implementation of the strategy, we experience a certain level of fatigue within civil society organisations in contributing to the GSDS. Voices are heard that since its implementation in 2002, there has been hardy any progress towards a socioecological transformation introduced by the GSDS despite the constant proposals of civil society organisations to increase pace.

From our point of view, there is no need for additional participatory formats but for a more effective and binding participation. We therefore suggest a clarification on mandates of the new formats as well as transparency on how exactly the input of civil

society organisations can impact the GSDS. Furthermore, we encourage that all formats are reconciled with all departments of the German Federal Government and obtain their acceptance.

8) Further strengthen horizontal and vertical integration (reference 2.1)

New efforts for a stronger horizontal and vertical integration have been made. However, there is a need to accelerate the process of horizontal and vertical integration which synchronizes the different strategies for sustainable development on all levels. Many Länder have developed own strategies within the last years. Some already explicitly refer to the SDGs. Moreover, many municipalities have understood their crucial role for implementing sustainable development and implemented sectoral or integrated strategical approaches. However, we see the need for a stronger coordination of these processes. For this purpose, a structured and targeted dialogue with representatives of all levels is needed to build new structures and mechanisms for a stronger cooperation between the Federal state, Länder and municipalities and agree on responsibilities for certain goals and measurements. The "Bund-Länder-Erfahrungsaustausch Nachhaltige Entwicklung" is a good start for a regular dialogue between the Federal State and the Länder. We encourage to intensify this dialogue and include representatives of municipalities.

Moreover, we strongly support the idea that sustainable development needs to be a compulsory task for all municipalities. This could include a mandatory set-up of long-term integrated strategies on sustainable development which encompass a defined range of policy feeds, specific goals and indicators and are translated into an action plan clarifying responsibilities and resources for its implementation. Strategies for sustainable development can also be complemented with a sustainable budget plan which links all resources to the annual budget (see also "Linkage of public finances to the sustainable goal system", page 5).

Finally, we currently perceive a gap in the vertical integration of the sustainability agenda, as regulations for many relevant policy fields (such as agriculture, energy, mobility, security) are negotiated and decided at the level of the European Union. Unfortunately, however, the ambition to work towards an integrated and ambitious strategy at the European level does not seem to be very pronounced. Instead, the European Union seems to restrict itself to sectoral targets or measures. Yet, a harmonised European approach could provide the current measures at national level with the decisive momentum.

9) Need for a New Governance (reference 2.1, 2.2, 2.3)

Even if we appreciate the new elements of the sustainability architecture, we believe that there is a need for general transformation of our governance system. Several key challenges which need to be addressed for a transformation towards sustainable development (such as climate change, biodiversity, poverty and growing social disparities) can hardly be solved within the current governance structures, which are

very contingent on tactical questions and the daily routine of political negotiations. This might also be the reason why many of the crucial topics for sustainable development didn't play a role in the recent campaigns for the federal elections in Germany.

For such required long-term decisions and to achieve the necessary pace of change, new governance models are needed. Democratically elected "future councils" which also consists of civil society organisations and scientific representatives and are implemented for a longer period of time (overarching regular election cycle) could be an effective and complementary new governance element.

Such "future councils" might also improve stakeholder involvement. The implementation of the above mentioned new elements are important steps for mandates of the new elements of the sustainability architecture. This might also prevent the danger that too many parallel formats of participation lead to the fatigue of involved actors.

It is important to establish sustainable development strategies as well on the level of municipalities. Good experiences have already been made with local sustainability councils which are appointed by the municipal council to develop a strategy for sustainable development. They comprise equally local politicians, representatives of the municipal administration and civil society organisations. In this multi stakeholder process the set-up of the long-term development strategy is negotiated, including a goal system and action plan specifying responsibilities and resources for its implementation, and finally adopted by the city council. We recommend to facilitate and support such processes on the municipal level more.

Moreover, the municipal level is the place where new formats for participation can be tried and implemented. Whether these are youth parliaments or participative budgeting, informal urban planning or multi stakeholder councils. Opening spaces for communication and collaboration, giving citizens the opportunity to engage in transformative actions to co-create their living environment and by that feel self-efficient is the best way to defeat disenchantment with politics. The institutional setup has to learn anew how to deal with these new instruments of participation. Furthermore, local transformative initiatives and social innovations should be acknowledged more as vital examples and impulse givers for political decision-makers.

To implement measures the German Federal Government needs to work with, support and strengthen groups as grassroots initiatives and local agenda groups who make a huge contribution towards a sustainable development. A great share of time and capacity is spent on bureaucratic processes, as setting up proposals, documentations and calling for funds. We recommend a simplification of these processes to enable the above-mentioned groups to focus on their contribution towards a sustainable development.

10) Use science-policy interface to intensify interlinkages between goals (reference 2.4)²⁶

We appreciate the implementation of the "science platform" as new mechanism to improve the science-policy interface. We believe that this platform can make major contributions to the further development and implementation of the sustainability strategy by for example supporting the enhancement of political cohesion. We therefore encourage that the platform could support the German government by identifying interlinkages between the goals such as target conflicts and synergies.

It is of no doubt that the negotiation und resolving of conflicts of interests as well as the leverage of synergies needs to be in the hands of democratic processes. These decisions cannot be undertaken by the scientific community but are the responsibility of politicians. However, as Blanc (2015) shows, scientific evidence on the interlinkages between the SDGs are not fully spelled out in the final documents of the Agenda 2030. A stronger cooperation between science and policy-makers could facilitate integrated thinking, inspire more integrated policy-making and policy innovations, contribute to more transparent and founded groundwork for political decision-making, ease the systematic consideration of synergies and trade-offs across SDG areas as well as concrete policies and also enable the mainstreaming of sustainable development. If these analyses would be publicly available, it could also inform the public debate and foster a transparent discussion about the most adequate solutions for sustainable development.

²⁶ Please refer also to "Science and Research for sustainable development", page 16

New opportunities and challenges (reference 3.1, 3.2, 3.3)

The Agenda 2030 has been recognized by a broad range of actors and gained considerable attention. Moreover, many actors – such as public agencies, civil society organisations, municipalities and businesses – committed to its implementation. We need to maintain this "spirit of change" to promote sustainable development!

12) Opportunities and challenges ahead

We observe many positive developments: On all levels, sustainability strategies are developed which exhibit a clear willingness to work on long-term solutions for sustainable development. The energy transformation in Germany is advancing even if recent policy changes might have slowed it down. In any case, citizens, civil society organisations and businesses drive the expansion of renewable energies forward. The concept of education for sustainable development (ESD) enjoys great popularity. Networks have been created and civil society organisations are pushing to integrate ESD into formal and non-formal education.

Despite this progress in some areas, we face considerable challenges (but also opportunities), which we have not fully grasped yet. In general, the sustainability agenda is closely intertwined with major societal developments that deserve consideration:

Digitalisation and the new social question

A topic which craves wide attention in political and public debates is the need to increase the speed for digitalisation. However, digitalisation is hardly addressed within the GSDS. It is widely discussed that digitalisation offers an impressive range of opportunities for our society, some of them potentially contributing to sustainable development. At the same time, digitalisation also comes with numerous risks. In this vein, an increasing digitalisation and automatization might fundamentally change the way we work, raising essential questions concerning working regulations, taxation (of income, capital, production) etc. Other risks are infringements of privacy or the tremendous demand for resources and energy. We recommend to also address this topic within the sustainability strategy and evaluate the related risks and opportunities.

Migration / Integration

In 2015, Germany received credit for its commitment to receive a considerable number of refugees. The term "welcoming culture" was on everyone's lips. Pictures of helping citizens have been on the news for weeks. Over time, this positive public perception towards refugees has changed. The dominant public discourse now relates to the challenges of integration, including over-challenged municipalities, housing shortages, domination by foreign cultures and competition on the labour market. As a consequence, the topics of migration and integration played a leading role in recent federal and state-level election campaigns.

The refugee policy has also been named within the GSDS as an outstanding policy field because

"the global refugee situation, which is also confronting Germany with big challenges, is showing us the urgent need for a concrete, global and sustainable approach." ²⁷

Moreover,

"the numerous causes of refugeeism and migration are also an expression of a current lack of sustainable development. The "2030 Agenda" addresses all of the chief reasons for refugeeism and migration in its catalogue of goals."²⁸

We share these observations and encourage more comprehensive and integrated political efforts to address the challenges and opportunities through the GSDS²⁹. We appreciate the initiative of Germany to work on a new shared responsibility to host refugees among all member states of the European Union, effectively overcoming the Dublin II agreement. However, we do not consider the increasing tendency towards an isolationist policy of the EU as well as the cooperation with autocratic regimes to prevent migration as a sustainable solution. The GSDS provides a powerful (but "under-used") instrument to work towards a more harmonised and inclusive approach to address the root causes of migration (link to other SDGs), as well as the challenges to integrating refugees and other migrants into our society.

A German Vision for Sustainable Development

Although several standard indicators (e.g. GDP growth) cast a positive view on life in Germany, significant parts of the population feel insecure or socially or economically "left behind". While we do not strive to provide comprehensive explanations for these perceptions, increasing social inequality is one explanation repeatedly advocated (About one quarter of the employed population works in the low-wage sector). The (perceived or actual) challenges of migration are sometimes seen as additional reasons.

Regardless of the underlying reasons, the pessimistic sentiments held by significant parts of the population seem to reflect in electoral results across Europe, including Germany at all political levels: Traditional people's parties are losing votes, while right-wing "protest" parties gain electoral support.

These trends might be reinforced by public discourses, which centres on negative expectations and leaves little room to develop positive accounts and optimistic visions of the future.

We feel that there is a strong need to strengthen measurements for democracy education, anti-racism education, media competences and world citizenship education in the framework of education for sustainable development. Education is an important key to raise awareness for sustainable development and combat scepticism against sustainability.

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²⁷ German Federal Government 2016: 19

²⁸ ibidem

Moreover, we share the view that the development of a positive vision can help to overcome short and medium-term conflicts. As the ESDN and the OECD & UNDP (2002) argue:

"Strategic planning frameworks are more likely to be successful when they have a long-term vision with a clear timeframe upon which stakeholders agree. At the same time, they need to include ways of dealing with short- and medium-term necessities and change. The vision needs to have the commitment of all political parties so that an incoming government will not view a particular strategy as representing only the views or policies of its predecessor." 30

Thus, we encourage to initiate a similar process in Germany, leveraging on the SDGs. Such a process could help to create a common vision for the future development of the German society and provides a tool to explicate diverging interests and provide a path to overcome these in the common interest of all involved stakeholders. The debate on the phasing out of coal mining provides an illustrative example of "deadlock", as (legitimate) short term interests (e.g. job security) collide with the societal long-term interests (e.g. reduction of carbon emissions). Formulating a strong vision of the future (i.e. a "post-coal scenario" or "post-combustion engine" scenarios) could contribute to overcoming these challenges by fostering social cohesion and generating a stronger acceptance and interests in sustainable development and the GSDS.

The strengthened Advisory Council would be a well-positioned actor to promote the formulation of such a vision, especially since the Agenda 2030 already contains important notions: The agreement promotes an inclusive development process (compared to other international agreements), which involved multiple stakeholders from diverse countries. (This process might have contributed to a broad "ownership" among the involved stakeholders regarding the final resolution.) It contains a vision ($\S 7 - 9$) and defines basic principles for the implementation of the SDGs. The notion "leave no one behind" also expresses a strong future vision. Thus, the Agenda 2030 can already be read as a promising basis for a new international and intergenerational social contract ("Gesellschaftsvertrag").

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³⁰ OECD & UNDP 2002: 33

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