

1. INTRODUCTION

1.1. The aim of the evaluation and utilisation of data

In its implementation plan for the 2030 Agenda (Prime Minister's Office Finland (PMO) 2017a), the Finnish Government has committed itself to a comprehensive evaluation of the national implementation efforts of the Agenda once per electoral term. The Government is also committed to assessing how Finland's foreign policy in all administrative sectors promotes the achievement of the goals of the 2030 Agenda.

The PATH2030 evaluation described in this report has two main aims:

1. To produce an independent and comprehensive view on sustainable development policy in Finland, especially regarding Finland's national policy, the national implementation of the 2030 Agenda and Finland's foreign policy.
2. To produce concrete recommendations on the future directions of Finland's sustainable development policy (taking into account different timespans and levels of ambition) as well as ways to evaluate it.

The evaluation has been produced as part of the Government's analysis, assessment and research activities (PMO). The PATH2030 evaluation and its results:

1. Create preconditions for coherent and long-term sustainable development policy that was called for in a parliamentary proposal (Committee for the Future 2017).
2. Strengthen the knowledge base for updating the Government's implementation plan for the 2030 Agenda after the parliamentary elections in 2019, and provide input into the preparation of the Government Programme and in choosing the focus areas in the Government Programme.
3. Provide content for social policy debate preceding the parliamentary elections.
4. Benefit all administrative branches by producing information on the relevance, efficiency, sustainability and coherence of their sustainability work.
5. Serve as an input for Finland's next VNR report to the UN High-level Political Forum on Sustainable Development in 2020.

The PATH2030 evaluation was coordinated by Demos Helsinki, the Finnish Environment Institute SYKE, and the Helsinki Institute of Sustainability Science HELSUS at the University of Helsinki. The PATH2030 evaluation's international partners were the Stockholm Environment Institute and the Sustainable Development Solutions Network. The evaluation was realised between 29 August 2018 and 28 February 2019.

1.2. The evaluation questions and limitations of the study

In addition to the two main objectives mentioned above, the project was entrusted with four main evaluation questions and several sub-questions. The project team needed to work on the limitations to the work and to clarify the questions so that the main aims and key evaluation questions were answered. The detailed evaluation questions include questions that needed to be addressed before more specific evaluations could be made. These issues relate, for example, to the state of sustainable development in Finland and its key issues, and to the main goals and means, challenges and strengths of sustainable development policy. The aims of the evaluation, the initial evaluation questions and the specified evaluation questions are presented in Table 3. Table 3 also presents the chapters of this evaluation report, where the clusters of each of the specified evaluation questions are examined. After the table, the changes made to the original evaluation questions and the most significant limitations are reviewed.

Table 3: Specified evaluation questions.

Aims of the evaluation	Evaluation questions	Specified evaluation questions
<ol style="list-style-type: none"> 1. To produce an independent and all-encompassing perspective on Finland's sustainable development policy, specifically for national policy, the national implementation of the 2030 Agenda and Finland's foreign policy. 2. To produce concrete recommendations for the future directions of Finland's sustainable development policy (taking into account different timeframes and levels of ambition), as well as ways to evaluate this progress. 	<ol style="list-style-type: none"> 1. What kind of impact pathway thinking/theories of change is Finland's sustainable development policy based on? 2. Will the current sustainable development policy and measures help achieve societal changes that promote permanent socially, economically and environmentally sustainable development? <ul style="list-style-type: none"> • Are the activities coherent from the sustainable development point of view? • Are the measures comprehensive, relevant and proportionate in relation to the goals? Are measures cost-effective compared to alternative measures? • What added value does the policy model bring to the cooperation of the administrative branches? To what extent does the policy model work in the desired way? 3. How are the human-rights based approach and leave no-one behind thinking of the 2030 Agenda realized in Finland's sustainable development policy? 4. Definition and systematic presentation of the links between the different administrative branches of foreign policy and the sustainable development goals. <ul style="list-style-type: none"> • How coherent is Finland's foreign policy in terms of achieving the sustainable development goals? Does Finland's policy model support the coherence of sustainable development policy outside Finland and in the different administrative branches of foreign policy? How and to what extent? • What are the policy measures that would significantly improve the coherence and effectiveness of external policies in the implementation of the 2030 Agenda in the short, medium and long term? 	<p>Status quo and core questions → CHAPTER 3.1</p> <ul style="list-style-type: none"> • What is the state of sustainable development in Finland in the light of the indicators? • What are the most central key issues to focus on in sustainable development policy? <p>Theory of change → CHAPTER 3.2</p> <ul style="list-style-type: none"> • What are the most important aims and methods of Finland's sustainable development policy? • How are these understood in practice among the most central stakeholders? • What is the theory of change underpinning Finland's sustainable development policy? <p>Policy actions → CHAPTER 3.2</p> <ul style="list-style-type: none"> • How will the central aims and methods of Finland's sustainable development policy be realised? • Do the central policy actions have an impact on the status of sustainable development? • Does the achievement of central aims pose challenges? What are the challenges and existing strengths? • How can policy be evaluated with regard to coherence, coverage and relevance? • What is or what could be the additional value of sustainable development policy? <p>Foreign policy → CHAPTER 3.3</p> <ul style="list-style-type: none"> • How are the human rights-based approach and the leave no-one behind thinking of the 2030 Agenda realized in Finland's sustainable development policy? • How coherent is Finland's foreign policy in terms of achieving the sustainable development goals? • Does Finland's policy model support the coherence of sustainable development policy outside Finland and in the different administrative branches of foreign policy? How and to what extent? • What are the policy measures that would significantly improve the coherence and effectiveness of external policies in the implementation of the 2030 Agenda in the short, medium and long term?

In the course of refining the research questions, the original list was supplemented with many questions that needed to be addressed in order to achieve the key aims of the evaluation. Firstly, the specified evaluation questions are related to the state of sustainable development in Finland and the most important issues shaping the content (Chapter 3.1).

In addition, the detailed questions also addressed, for instance, the most crucial elements of the theory of change and building a solid understanding of the practicalities of different stakeholders (Chapter 3.2). In the case of policy measures, evaluation questions were complemented with questions on the implementation of key targets and means, and their challenges and strengths (Chapter 3.2).

The most significant limitation of the questions was related to the fact that the cost-effectiveness of sustainable development policy was only addressed with a few sentences as part of Chapter 3.2.3. and was thus removed from the evaluation questions.

Cost-effectiveness was in turn addressed as part of the interviews with ministries and experts, but only very general information was obtained on its realisation. A thorough evaluation of cost-effectiveness would have required a significantly different research approach than those pursued in this initiative. This could also have meant double work, as the National Audit Office of Finland will conduct a performance audit in 2019 on the governance model for sustainable development. The upcoming study will assess, inter alia, the economic impact of the measures presented in the Government Report.

In the section addressing foreign policy, the questions were in line with the original proposals. In practice, the section focused **more deeply on foreign and development policy related to the private sector**, as outlined in the original project plan. This made it possible to extend the perspective of the Ministry for Foreign Affairs to other ministries, and to foreign policy that has a broader reach than traditional development policy themes. Working in this manner ensured that the limitation remained manageable. The evaluation focused especially on trade policy and international tax policy, which have gained more emphasis in recent years, inter alia, through the 2030 Agenda. This was also conducive to keeping the scope of the study manageable. Regarding the Leave No One Behind (LNOB) principle, which was specifically required in the call for proposals, and the review of the human rights basis, it was decided, instead of examining individual human rights, to take a similar approach to the general policy on businesses and human rights.

Following this review, it was possible to look at how the 2030 Agenda extends the rather narrowly defined development policy of the UN Millennium Development Goals beyond the boundaries of administrative sectors, including, for example, the formation of positions for the EU and the OECD (concerning tax rules). The approach is also in line with how foreign policy is defined in the Government Programme and in government publications.³

Other limitations of the PATH2030 evaluation

The evaluation focused on the national level, but international questions are examined both as part of the evaluation of foreign policy and indirectly in the implementation of the 2030 Agenda in Finland. When interpreting the results, it should be noted that the national perspective may overlook some features that are significant on the local, regional or sector-level. Furthermore, key issues in sustainable development were examined as part of the entity of sustainable development policy. Consequently, no further in-depth research was conducted on any singular issue aside from the policy instruments for sustainable development and foreign policy. The methods of the PATH2030 evaluation are discussed in more detail in Chapter 1.4, and the overall evaluation framework, its strengths and limitations, are analysed in Chapter 4.5.

³ Another approach would have been to look at how the 2030 Agenda raises issues such as export promotion or innovation policy on the agenda for sustainable development and foreign policy, and how human rights and LNOB impacts and sustainability targets are taken into account in this work. In this context, we will present an extension of similar evaluations in the future.

The PATH2030 evaluation focused particularly on the time after the 2030 Agenda entered into force in early 2016. However, the examined materials also include the national public instrument called the Society's Commitment to Sustainable Development launched in 2013⁴ as well as the launch of the Commitment2050 tool⁵ (Figure 1).



Figure 1. Timespan of the PATH2030 evaluation

1.3. Approach of the evaluation and central concepts

The evaluation focuses on Finland's sustainable development policy and cross-administrative foreign policy. The use of these key concepts in this report is described in Table 4. For example, there is no single definition formulated for sustainable development. The conceptualisation of sustainable development as a political objective has been taken from central documents on sustainable development policy in Finland (PMO Finland 2017a; see also Chapter 2). On the other hand, it has also been the subject of evaluation, as this initiative has examined how sustainable development policy is perceived by key stakeholders (Chapter 3.2.1). Chapter 2 describes sustainable development policy and, for example, the relationship between the 2030 Agenda and Finnish policy in more detail.

Table 4. Central concepts of the evaluation and their distinctions

Sustainable development policy	Sustainable development policy in this broadest sense refers to all policies that affect the achievement of Finland's sustainable development targets (see Chapter 2). It may also refer, therefore, to policies that have not been included in the scope of sustainable development in previous declarations. This scope may include, for instance, measures to combat climate change or to prevent the growth of societal inequality, or measures of economic policy, which, for example, either increase or decrease the total consumption of natural resources or the rate of employment.
Operational model of sustainable development	In this evaluation, the operational model of sustainable development refers to a comprehensive set of cross-administrative policies whose official mission is to promote sustainable development. The concept includes, therefore, a coordination model of sustainable development as defined below, but also covers, for example, budget reviews from a perspective of sustainable development and the integration of sustainable development as

⁴ Society's Commitment to Sustainable Development, "The Finland we want by 2050" was introduced by the National Commission on Sustainable Development as Finland's sustainable development strategy, <https://kestavakehitys.fi/en/commitment2050>

⁵ <https://commitment2050.fi/>

	part of the strategies, measures, indicators and evaluation of ministries (Chapter 3.2.2).
Coordination model of sustainable development	The coordination model of sustainable development in Finland is described in more detail in Chapter 2 (Figure 3). It covers stakeholders, networks and documents that support sustainable development policy on the national level. These are central to the coordination, management, monitoring, and sparring of Finland's sustainable development policy, for example, from the perspectives of young people and research.
Foreign policy in all sectors of government	The necessity of 'foreign policy across all administrative branches' as mentioned in the call for proposals for this project does not have an established definition. According to the Government's report on the 2030 Agenda, "Finland as a global partner supports the sustainable development of developing countries through various means of foreign and security policy, such as trade policy and development policy" (PMO Finland 2017a, p. 42). According to the Government Programme, the government "increases the importance of strengthening the business activities and tax bases of developing countries in Finnish development policy" (PMO Finland 2015b, p. 35). The focus of the report is based, among other things, on these government priorities, which are also linked to the UN processes that preceded the 2030 Agenda.

An evaluation is the product of a process of determining merit, worth, or significance (Scriven 2007), for example of a policy or set of policies. The Expert Panel on Sustainable Development, coordinated by the Finnish Innovation Fund Sitra, recommended that the evaluation of Finland's sustainable development policy should support a change-oriented, coherent and multi-level policy implementation. The main objectives of the evaluation were the state of sustainable development, the progress of implementation and the effectiveness of the measures (Expert Panel on Sustainable Development 2018). The PATH2030 evaluation has been largely based on these recommendations.

The work was based on a theory-based evaluation that aims to understand the preconditions and mechanisms of implementation. These affect both the process and its outcome. The theory-based evaluation can be used to analyse when and how programmes work and how the results correspond to plans (Expert Panel on Sustainable Development 2018, Weiss 1997). The second, even more central, starting point for the work was the tradition of developmental evaluation. In it, the purpose of the evaluation process is not only to understand the merit, worth and significance, but for example to support the development of a certain policy, political programme or organisation (Sustainable Expert Panel 2018, Patton 1994).

So far, most national evaluations of sustainable development have focused on evaluating policies and institutional arrangements or assessing individual objectives (United Nations 2016, 2017). In this evaluation, we strive to correct this deficiency by evaluating Finland's sustainable development policy and cross-administrative foreign policy, in which not only distinct sustainable development policy instruments, but also governmental policy measures

on a wide range of governmental sectors along with their interaction and coherence are relevant.

The so-called 4Is approach was used as the reference framework for evaluating sustainable development policy through institutions, interests, ideas and information (Brockhaus & Angelsen 2012). When examining the institutional level, an attempt was made to analyse how societal structures limit or promote sustainable development policy. The interests of stakeholders also have a major impact on what kind of policy is being promoted. The examination considered how the different positions would gain a voice and who could participate in the decision-making process. At the level of ideas and ideology, efforts were made to identify the ideologies that guide stakeholders and how the ideas of sustainable development have been accepted in politics. We also looked at the type of information that was used to support policy, and how information has guided the direction of policy.

Figure 2 summarises the developmental process of the evaluation.

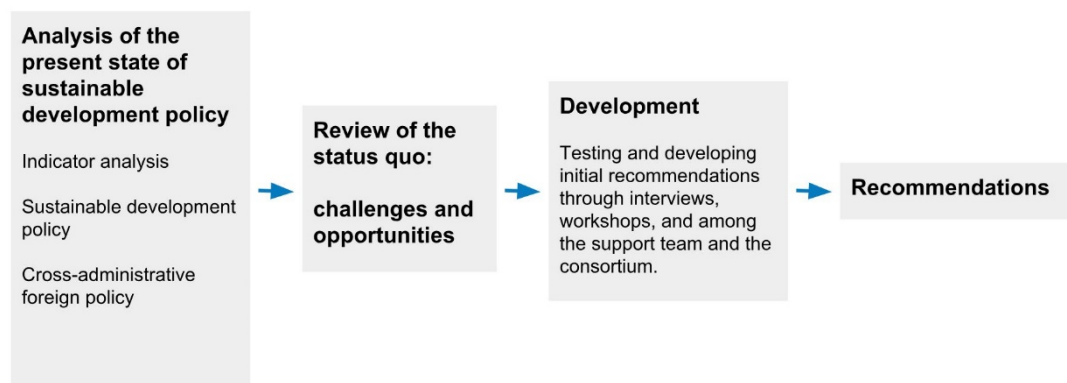


Figure 2. The PATH2030 initiative combines an evaluation of the current situation and the joint development of concrete follow-up recommendations

1.4. Material, methods and process of the evaluation

The PATH2030 evaluation work used extensive and diverse material, which consisted of indicators, documents and expert opinions collected through surveys, interviews and workshops. This section outlines the material used in the evaluation (Table 5) and its analytical methods. Detailed descriptions of the evaluations carried out, as well as lists and documents related to the material and its collection process, are supplied as appendices in this report, which are available in Finnish.

Table 5. Material for the PATH2030 evaluation

Indicators	SDG Index and Dashboards indicators Ten indicator baskets of the State of Sustainable Development monitoring system Helsinki Policy Dialogues material (expert reviews on indicators and workshops)
Central documents	Government programmes and strategies Preparatory documents for development cooperation projects, EU-related governmental position papers
Survey (N=238)	Closed survey for key actors in sustainable development policy (27) Open Poll (211)
Interviews (78 interviewees)	Key experts Representatives of all ministries Expert Panel on Sustainable Development Key stakeholder representatives related to the preliminary results
3 workshops	Two open stakeholder workshops (about 80 and 40 participants) International expert workshop

Indicator Analysis

The state of sustainable development in Finland was studied by analysing national and international sustainability indicators. The results of the indicator analysis are presented in section 3.1, and the analysis is described in Appendix 1 (in Finnish). The indicator analysis was based on expert review where existing material (time series of indicators, interpretative texts and public comments where applicable, as well as expert discussions as part of the HELSUS Policy Dialogues) was used.

Document Analysis

At the beginning of the project, existing key documents were analysed. These included the Government Annual Reports for 2015–2017, the monitoring conducted by Jyrki Katainen and Alexander Stubb's Government Programme 2015, the Government Action Plan 2018–2019 (2018c), the 2030 Agenda report (2017), Government's Common Drivers for Change (2017), futures reviews for the branches of government (2018), draft budgetary plans 2018 and 2019, a summary report on administrative measures regarding the 2030 Agenda (2016) compiled by the Prime Minister's Office, which classifies ministerial measures according to the Sustainable Development Goals (SDG) objectives. In addition, previous evaluations on sustainable development in Finland, such as the reports of the Avain2030 and KekeArvi projects (Lyytimäki et al. 2016, 2017), were used as well as the [kestavakehitys.fi](#) (Sustainable Development) and [sitoumus2050.fi](#) (Commitment 2050) websites. In addition, the Foreign Policy section reviewed, among other things, EU-related governmental position papers, as well as documents related to development cooperation projects, the exact breakdown of which can be found in Appendix 14 (in Finnish).

Surveys

The initiative carried out a Webropol survey in September–October 2018, with 238 respondents (see Appendices 3 and 4, which are available in Finnish). Respondents were asked eight substantive questions about the present state and political dimensions of sustainable development in Finland with space for open comments at the end. Respondents were also given the opportunity to justify or explain their answer further in a text box after each question. The survey was distributed to respondents in two different ways. The first survey was

distributed through a personal link to key stakeholders in sustainable development policy and the second survey was distributed as an open questionnaire in social media and email lists.

Interviews

78 persons were interviewed as part of the initiative, mainly in August-November 2018 (see Appendix 5, which is available in Finnish). In order to gather background information, members of the Expert Panel on Sustainable Development (seven persons) and other key experts (twelve persons) were interviewed individually and in groups to take into account the most crucial issues, changes and informational needs of the project. In the section on foreign policy, 22 persons were interviewed between June 2018 and January 2019, some of them twice. In each ministry, members of the Sustainable Development Coordination Network (twelve persons) were interviewed, as well as groups of experts in most ministries convened by the contact persons (see Appendix 6 and 7). In addition, in order to ensure the quality of the recommendations, representatives of stakeholders and other key figures were interviewed at the end of the project.

Workshops and partner meetings

The evaluation offered broad opportunities for participation for key actors and stakeholders in sustainable development policy. The main opportunities for participation were two large workshops organised in the House of the Estates in Helsinki (an evaluation workshop in October 2018 and a development workshop in December 2018). In addition, an evaluation workshop was organised with the project's international partners (Stockholm Environment Institute, Sustainable Development Solutions Network). The project was also discussed with partners such as the National Audit Office of Finland NAOF (January 2019) and EvalPartners (October 2018). The steering and support group meetings were also important for the evaluation process and the formulation of recommendations. The members of the support group were key experts and representatives of ministries and stakeholders.

Other methodological choices

In order to assess better the political coherence of sustainable development, a separate review of possible interactions among the 2030 Agenda objectives was carried out (Box 1). The review was based on an evaluation framework tested in Sweden (Nilsson et al. 2016, Nilsson 2017, Weitz et al. 2018). The cross- impact analysis is described in Appendix 13 (in Finnish).

Based on the indicator analysis and the survey, interview and workshop materials, documents and previous literature, key issues that were particularly challenging from the point of view of achieving Finland's sustainable development targets. These analyses are described in Appendix 2. Later in the evaluation process, themes where Finland is doing well internationally were identified. These are described in Chapter 3.1.2.

The PATH2030 evaluation was carried out using several participatory methods. The evaluation of the current state of sustainable development and its policy instruments (Chapter 3) served as a basis for the interpretation of results and the development of recommendations (Chapters 4 and 5). Recommendations were made through collaboration in workshops and supplemented with interviews. Therefore, the recommendations are the result of co-creation and not directly arising from individual interviews.

Box 1. Evaluating and promoting policy coherence for sustainable development

Policy coherence for sustainable development (PCSD) has become one of the guiding principles in the implementation of the 2030 Agenda internationally. In the 2030 Agenda, it is listed as a way to implement the agenda and as a goal (target 17.14). *Policy coherence* is an approach and a tool that aims to integrate the economic, social, environmental and administrative aspects of sustainable development into all policies, both nationally and globally. The main objective of policy coherence is to promote synergies between different areas of policy, identify conflicts and mediate national and international objectives. The aim is also to consider the impact of national policies in other countries (OECD 2014).

Policy coherence is one of the most challenging objectives for the 2030 Agenda countries. The interactions that occur in its implementation are complex and are characterised by interdependencies between different policies. A detailed evaluation of multidimensional and multi-stakeholder policy coherence as a whole is impossible: policy coherence should be promoted between all SDG objectives everywhere, now and in the future and with different actors (Mackie et al. 2017).

Policy coherence can be assessed in parts from different perspectives. First, we can look at how institutional structures contribute to policy coherence (see below). Second, it is possible to assess the types of interaction, synergies and contradictions that exist between different policies, and consider the actual impacts of policies both within and outside Finland. The impact of policies is largely outside the scope of this evaluation; further, there is a lack of practices and tools for evaluating it at all (Koch 2018). However, currently these are being developed internationally, and some examples already exist (OECD 2018c, European Commission 2016, The Netherlands' Ministry for Foreign Affairs 2014). In addition, this report used a method previously used in the Swedish context to identify policy interactions (see Chapter 1.4 and Appendix 13, which is available in Finnish).

Institutional mechanisms enabling and enhancing policy coherence play a crucial role in the successful implementation of SDGs. The OECD has identified eight building blocks that can best support policy coherence in the institutional framework (OECD 2018a, 2017):

1. Political commitment and leadership at the highest level
2. Policy integration in different areas: taking into account the interactions between economic, social and environmental dimensions
3. Long-term planning horizons: plans go beyond the electoral term, and the short-term and long-term priorities must be balanced
4. Policy effects on well-being “here” and “now”, as well as “elsewhere” and “later”, are considered systematically
5. Responsibility for coordination in sustainable development policy is clear and at an appropriate level in administration
6. Ensuring the participation and subnational commitment of regions, cities and municipalities
7. Objectives and indicators for monitoring and reporting are set
8. Stakeholder participation.

In the PATH2030 evaluation, policy coherence analysis is described in chapter 3.2.3 (Strengths and Challenges of Sustainable Development Policy). The coherence of sustainable development policy is also discussed briefly in Chapter 3.2.2 (Actualisation of the core aims and methods), as “coherence and global partnership” has been one of the key policy principles raised in the Finnish 2030 Agenda report (PMO Finland 2017a). It is noteworthy that the concept of policy coherence is not unambiguously defined in the report, but it seems that the interpretation of the content of the concept is less broad than here.

2. FINLAND'S SUSTAINABLE DEVELOPMENT POLICY

2.1. Finland's roots and key agents in sustainable development

Finland's sustainable development policy has a tradition spanning over decades (Finnish Committee for Environment and Development 1989, Niestroy et al. 2013, Rouhinen 2014). Since 1993, the **Finnish National Commission on Sustainable Development** has acted as a coordinating body at the national level. The political weight of the commission has been increased by the fact that it has been chaired by the Prime Minister or a minister, and its members have represented broadly various sectors of society from political decision-making to ministries, research institutes, interest groups and NGOs.

The work of the National Commission on Sustainable Development has been supported by a secretariat that was set up originally by the Ministry of the Environment. Since 2016, this Sustainable Development Coordination Secretariat has been functioning at the Prime Minister's Office. In practice, the secretariat consists of two to three persons. Sustainable development policy is supported by the **Coordination Network** of ministries, which meets around once a month. The task of the Coordination Network is to act as a link between the various administrative sectors and national sustainable development policy.

The **Expert Panel on Sustainable Development**, which has been in operation since 2013, has sought to highlight research data related to sustainable development policy. The panel consists of independent experts from different fields who have been responsible for the panel's statements. The expert members have participated in the work of the panel alongside their own professions. The Finnish Innovation Fund Sitra was responsible for hosting the panel until the end of 2018. In particular, the panel has produced concise summaries and statements on topical issues related to sustainable development, such as the sustainable economy and the evaluation of sustainable development policy. In addition, the panel has commented on issues related to sustainable development policy such as the 2030 Agenda report (PMO Finland 2017a). At the beginning of 2019, new expert members were appointed to the panel, and responsibility for its practical coordination was shared with the Finnish Environment Institute (SYKE), the Natural Resources Institute Finland (Luke) and the Helsinki Institute of Sustainability Science (HELSUS).⁶

In 2017, a new agent became part of the overall network of Finland's sustainable development policy as the Agenda 2030 Youth Group coordinated by Finnish Youth Cooperation Alianssi was established under the Finnish National Commission on Sustainable Development. In particular, the Youth Group aims to increase the participation of young people in the planning and implementation of the 2030 Agenda at the national level.⁷

⁶ Two of the host organisations of the new Expert Panel on Sustainable Development are involved in the PATH2030 consortium. However, the evaluation is critical of this model for an expert panel and it is not seen as optimal in the light of the collected material. Eeva Furman from the Finnish Environment Institute SYKE has chaired the Expert Panel on Sustainable Development. She was also elected chair of the renewed panel that started its work in 2019. Furman has participated in the PATH2030 evaluation as an expert advisor. She has not been involved in writing the report or, for example, evaluating the Expert Panel, or formulating recommendations. More information on the work of the Expert Panel on Sustainable Development: <https://www.sitra.fi/en/topics/expert-panel-sustainable-development>

⁷ <http://www.nuortenagenda.fi/> (in Finnish)

Finland's sustainable development coordination model⁸, which was the focus of this evaluation, is presented in Figure 3.

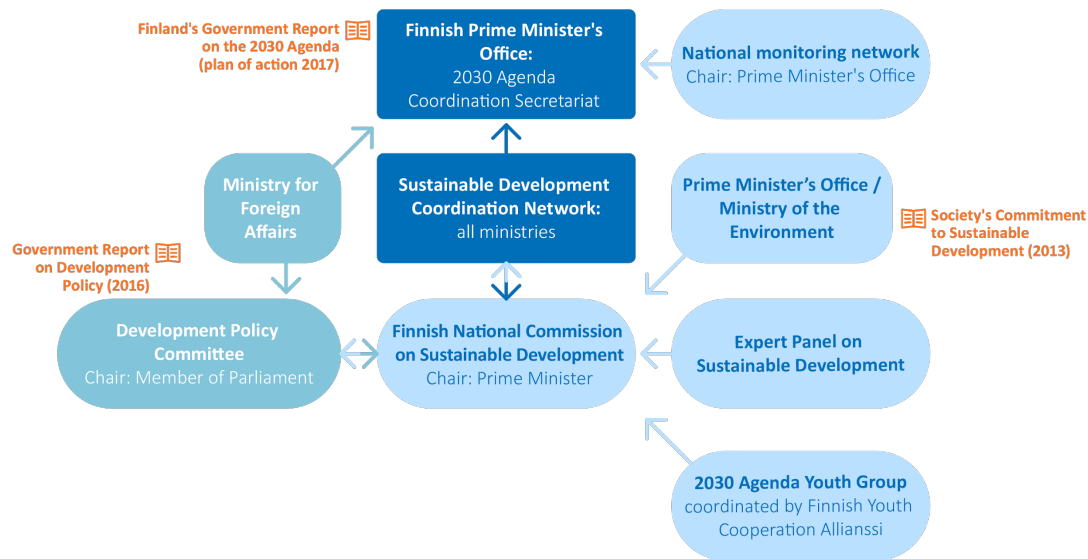


Figure 3. The Coordination Model of Sustainable Development in Finland⁹

Finland's first national strategy for sustainable development was published in 1998 and the second in 2006 (Ministry of the Environment 1998, PMO Finland 2006). These were extensive documents containing rather detailed objectives. In 2013, the Finnish National Commission on Sustainable Development issued a new strategic statement called the Society's Commitment to Sustainable Development in the form of, unlike its predecessors, a concise document¹⁰. It includes eight general objectives and a long-term vision that the Finland of 2050 will be a globally responsible country committed to the wellbeing of its citizens as well as to respecting environmental carrying capacity. At the beginning of 2016, the Society's Commitment strategy was updated to be compatible with the global Sustainable Development Goals (SDGs) adopted by UN member states in 2015.

The monitoring and evaluation activities of sustainable development have used indicators since 2000 (Rosenström & Palosaari 2000). Indicators help to gather measurable data on the themes identified as key issues in the strategies of sustainable development. Today, indicators for sustainable development have been compiled into ten indicator baskets, each with about four to six indicators¹¹. The preparation of the indicators falls under the responsibility of a monitoring network for sustainable development composed of representatives of ministries and research institutes, and the General Secretariat on Sustainable Development. The Kestavakehitys.fi (Sustainable Development) website not only offers the opportunity to get acquainted with the indicators, but also to participate in the discussion and present one's own views on the interpretation of the indicators. The aim is to update the indicators and their interpretation texts annually.

⁸The term 'coordination model of sustainable development' has been used in this evaluation to refer to the whole set of key agents, networks and documents presented in Figure 3. The term 'operating model of sustainable development' has been used, however, when it has been necessary to refer to a wider set of measures to promote sustainable development, including the activities of ministries on mainstreaming sustainable development and the pledges made using the Commitment2050 tool.

⁹ The Expert Panel on Sustainable Development is not mentioned in the figure because it changed during the evaluation period. During the years 2013-2019 the panel was coordinated by Sitra. From 2019, the responsibility of the coordination was divided between the Finnish Environmental Institute (SYKE), the Natural Resources Institute Finland (LUKE) and Helsinki Institute of Sustainability Science (HELSUS).

¹⁰<https://kestavakehitys.fi/en/commitment2050>

¹¹<https://kestavakehitys.fi/en/information-on-monitoring>

The implementation of sustainable development has previously been widely evaluated at the national level in 2003 and 2009 (Patosaari 2003, Ramboll 2009). Other evaluations and studies supporting sustainable development work also have been carried out in Finland (e.g. by the National Audit Office of Finland 2010, Rouhinen 2014, Lyytimäki et al. 2016, Lyytimäki et al. 2017); an assessment of innovations related to sustainable development in Finland is currently in the making¹². This evaluation focuses on the period following Finland's last sustainable development strategy (2013) and the UN 2030 Agenda (2015). These milestones are described below.

2.2. Society's Commitment and the Government's 2030 Agenda report

Preparing for the Society's Commitment to Sustainable Development strategy model was the responsibility of the Finnish National Commission on Sustainable Development. It was first published in 2016 under the title "The Finland We Want By 2050". In practice, the Society's Commitment initiative replaced the previous national strategy for sustainable development (PMO Finland 2006). The purpose of a societal commitment is to motivate and engage the public administration with other agents to promote sustainable development in their entire sphere of work and activities. It is therefore a very ambitious objective and one that relates in principle to all activities of all agents. The Society's Commitment is underlined as being "the National Commission on Sustainable Development's interpretation on what sustainable development means" (Finnish National Commission on Sustainable Development 2016). Its eight general objectives at the national level will be implemented through more specified objectives and measures defined by each agent or stakeholder.

In the spring of 2016, the Society's Commitment was updated to be compatible with the UN's global 2030 Agenda for Sustainable Development adopted in the same year. The programme includes 17 main Sustainable Development Goals (SDGs) and 169 more detailed targets within these (United Nations 2015). The starting points for the programmes are similar. They strive to cover a wide range of aspects of sustainable development. However, the technical implementation of the 2030 Agenda and the Society's Commitment of Finland are still different in some aspects. The main differences are the number of main goals, the lack of more detailed sub-targets in the Society's Commitment, and the different timeframes: the global goals have been primarily aimed for 2030 and the national Commitment goals for 2050.

Goals of sustainable development have become a major high-level policy orientation in Finland. Although the Ministry for Foreign Affairs was primarily responsible for the 2030 Agenda negotiation, and the Ministry of the Environment previously responded for sustainable development policy, the implementation and monitoring of the targets was transferred to the Prime Minister's Office in 2016, where the **2030 Agenda Coordination Secretariat** is now hosted.

In Finland, the government is responsible for implementing and monitoring the 2030 Agenda. In 2017, the government published an implementation plan for the 2030 Agenda (the 2030 Agenda report, PMO Finland 2017a). It explains how the Finnish government intends to implement the UN Sustainable Development Goals by 2030. The report is built on **two focus areas aligned by the government**: 1) achieving a carbon-neutral and resource-

¹² Naumanen, M (2019). Sustainable development innovations support the unpublished draft of the 2030 Agenda Implementation (KITA) project. VTT

wise Finland; 2) securing non-discrimination, equality and a high level of competence in Finland by 2030. In addition, the report contains three **cross-cutting policy principles**: 1) long-term action and transformation; 2) policy coherence and global partnership; 3) ownership and participation. The report outlines the key objectives and concrete measures for focus areas and policy principles that support the implementation of the Government Programme; they are in line with sustainable development work in different governmental sectors. The report describes also the system for monitoring and evaluating sustainable development. The Society's Commitment to Sustainable Development is a key starting point for the 2030 Agenda report. When the report was presented to Parliament, the **Committee for the Future** became its reporting committee.

Through the 2030 Agenda report, sustainable development policy has become integrated more closely into the activities of the Government. Since 2016, progress on sustainable development has been reported as part of the **Government Annual Report**. The 2019 budget was the first to examine sustainability implications in the general aims of the budget, such as the amount of taxes and subsidies on sustainability, with a focus on a "carbon-neutral and resource-wise Finland".

In future, the report will be presented to Parliament in every electoral term. Its implementation is monitored in the Government Annual Reports. The Committee for the Future produced a report (Committee for the Future 2017) for the Government Report (VNS 1/2017 vp) on the recommendations for the 2030 Agenda, which Parliament should demand from the Government. The recommendations were broad-based and largely in line with the recommendations made in this report. In its report (Committee for the Future 2018), the Committee for the Future stressed also that the implementation of the 2030 Agenda as a governmental report was important. It ensures Parliament the opportunity to deal extensively with the matter and to monitor the annual measures in its annual reports. In addition, the report process supports policy that extends beyond the electoral term.

2.3. Sustainable development in foreign policy

In foreign policy, the 2030 Agenda was preceded by the UN Millennium Development Goals (MDGs), which came into force in 2000, and the Millennium Declaration supporting them. Compared to the Millennium Development Goals, one of the key reforms of the 2030 Agenda goals was that the goals **also apply to the national policies of rich countries**. Nonetheless, the idea of a partnership between northern and southern states, already present in the Millennium Development Goals, remained strongly on the agenda. Another key innovation was that development and well-being be examined and pursued **within the planetary boundaries**.

The Government Report on Finnish Foreign and Security Policy establishes that sustainable development goals are central to Finland's foreign and security policy. The policy emphasizes strengthening gender equality and the human rights of women and girls, reducing inequalities, tackling climate change and its impacts, promoting peaceful societies, guaranteeing legal services for all, and effective and responsible institutions. (PMO Finland 2016b). The Prime Minister's Office's 2030 Agenda report states that "As a global partner, Finland applies foreign and security policy measures such as trade and development policies to support sustainable development in developing countries." (PMO Finland 2017a, p. 31).

This evaluation will examine the mainstreaming of **human rights and the Leave No One Behind principle in foreign policy, especially in the private sector**. Not only are these

themes priorities of Finland's foreign and development policy, they are also good examples of cross-sectoral governance in sustainable development. In addition, the growing emphasis on the private sector -driven development has been an international trend.

The evaluation of the relationship between the private sector and foreign policy will partly build on the previous work of the **Development Policy Committee**. In addition to the Department for Development Policy of the Ministry for Foreign Affairs and the OECD Development Assistance Committee (peer reviews), the Development Policy Committee is the only entity that systematically and extensively monitors and evaluates Finland's development cooperation and policy. The Prime Minister's Office institutes the Development Policy Committee every electoral term. It consists of parliamentary parties, advocacy groups, non- governmental organisations and universities of the UniPID network. The Development Policy Committee has intensified its cooperation with the National Commission on Sustainable Development, including through joint meetings.

Following the Government Programme, the most important documents outlining the relationship between sustainable development and foreign policy are the Government Report on Development Policy and the Government Report on Finnish Foreign and Security Policy (Foreign Affairs Committee 2016, PMO Finland 2016b). In practice, dealing with sustainability issues has been limited to the first of these reports.

3. RESULTS OF THE EVALUATION

3.1. The state of sustainable development in Finland

3.1.1. The state of sustainable development in the light of indicators

This section answers the following detailed evaluation questions:

- What is the state of sustainable development in Finland in the light of indicators?
- What are the key issues that should be addressed in sustainable development policy?

The aim is to measure the achievement of the 2030 Agenda goals internationally with indicators, of which there are currently 232. These official SDG indicators are constantly being developed, but so far their usefulness is limited due to the problems of defining the indicators and lack of a knowledge base (Janoušková et al. 2018). Since 2016, the Bertelsmann Foundation and the Sustainable Development Solutions Network (SDSN) have published the yearly **SDG Index and Dashboards** report (Sachs et al. 2018). The report is not an official tool for monitoring sustainable development but is complementary to official SDG indicators and voluntary national evaluation processes. The SDG Index and Dashboards report, using historical data, has assessed how a state has developed to reach a SDG, and has determined whether this development will be sufficient to reach the SDG by 2030. Figure 5 summarises Finland's results in the 2018 report. According to the 2018 report, Finland has been particularly successful in achieving the SDG # 1 (No Poverty) and SDG # 7 (Affordable and Clean Energy) targets. Like wealthy countries in general, the biggest challenges facing Finland are the achievement of SDG # 12 (Responsible Consumption and Production), # 13

(Climate Action) and # 14 (Life Below Water). In the country-specific SDG Index scoring, Finland ranked third after Sweden and Denmark.

Finland's national **State of Sustainable Development monitoring system** and its ten indicator baskets form an indicator system parallel to the SDG Index. The national indicators provide information on Finland in relation to the Society's Commitment to Sustainable Development¹³ and its eight objectives and support national efforts on sustainable development policy. The indicators have been selected on the basis of extensive development work involving ministries and some state research institutes, but not the wider scientific community. National indicators are constantly being developed. Statistics Finland has also started collecting data from Finland in accordance with the SDG targets and published a national reporting platform in February 2019 to monitor the implementation of the Sustainable Development Goals of the UN 2030 Agenda in Finland¹⁴. The platform has information on some SDG indicators and will be complemented in the future.

Figure 4 summarises the equivalences between Finland's sustainable development indicator baskets and the SDG Index and Dashboards Report and presents an evaluation of the state of sustainable development in Finland. On the left-hand side of the picture, there is an interpretation of the state of sustainable development made in the PATH2030 project, based on an expert evaluation of the sources used (see Appendix 1). The right-hand side depicts Finland's performance as presented in the 2018 SDG Index and Dashboards report and the direction of development in relation to the SDG objectives.

To summarise, **the state of sustainable development indicators has been evaluated as alarming more often on the national indicators side than in the SDG Index**. The yellow SDG level used in the index may contain several developmental paths considered positive, and the evaluation of one single indicator as yellow, changes the overall level from green to yellow. Hence, on the SDG Index, the green level is hard to reach (see Figure 4 for explanations of colours). The national indicators have been selected to measure issues relevant to Finland, while the indicators of the SDG Index are global. Many indicators, such as indicators of extreme poverty, malnutrition or primary health care, are not informative when describing the situation in Finland. The difference in the indicators and their different assessment, also influence the result. The estimated status and trend of the SDG Index is calculated by using a mathematical formula. This is currently not possible for the national indicators. The picture illustrates that while Finland can be seen in many aspects as an advanced country in sustainable development measured by international indicators (SDG Index trends), in a national perspective, there are many areas to be improved. Figure 5 shows the state of sustainable development in Finland as measured by national indicators.

¹³ <https://kestavakehitys.fi/en/information-on-monitoring>

¹⁴ http://www.stat.fi/tup/kestavan-kehityksen-yk-indikaattorit-agenda2030_en.html

3.1.2. Key issues of sustainable development

The project assessed the most important issues of sustainable development in Finland, where Finland still needs to improve its policies, and what are Finland's strengths. The review is based on national and international indicators, previous surveys and studies, the PATH2030 survey, interviews with expert panelists, and inter-ministerial group interviews where ministry experts assessed the significance, challenges and opportunities of sustainable development issues. Below is a concise summary of the most important topics that were identified. The summary presents an overall interpretation by the PATH2030 evaluation team, which also combine partially conflicting views from different sources and commentators. More detailed descriptions may be found in Appendices 1, 2, 3, 4, and 7, which are available in Finnish.

Based on the indicator analysis and interviews, Finland's strengths were identified as competence and societal stability.

Competence

According to national indicators, Finland performs well in education and the development of skills: the proportion of the population that has completed basic education is high and, for example, the utilisation rate of library services continues to be high. However, the trends in the development of literacy and social skills among young people are worrying and the share of research and development expenditure in the GDP has declined. Six of the eight sub-indicators of the SDG Index (SDG # 4) measuring education indicate the best possible status (Sachs et al. 2018). Furthermore, the open answers of the PATH2030 survey indicate an appreciation for the Finnish education system, and competence was described as a prime export product for Finland. At the same time, however, the importance of maintaining this status quo was underlined. Competence was also recognised as a strength for Finland in ministry interviews. However, according to some interviewees, there is still work to be done to support lifelong learning.

Societal stability

The national indicators do not directly measure the stability of society, but seven of the nine sub-indicators of SDG # 16 (Peace, Justice and Strong Institutions) of the SDG Index indicate the best possible status. This is also reflected in international comparisons of national security and stability, many in which Finland has ranked first or at least in the top ten¹⁵. The open responses in the PATH2030 survey highlighted stability and prosperity and thus Finland's favourable situation requires it to be globally responsible. According to interviews with the Ministry of the Interior and members of the expert panel, social trust is the foundation of everything, and confidence in the authorities has not been shaken even in recent times. For example, highly publicised charges against senior police officers were seen as confidence-building because they show that everyone is equal before the law.

The next part describes key issues of sustainable development, on which Finland has yet to improve according to this evaluation, but for the development of which there are already significant political processes.

¹⁵ Eurostat (2018), Fragile State Index (2017, 2018), Global Law and Order (2017, 2018), World Economic Forum (2017), World Internal Security and Police Index (2016)

Sustainability of the energy system

According to the SDG Index and the national indicators, Finland is doing well in its efforts to expand sustainable energy. Renewable energy accounts for a large share of final energy consumption in Finland, and about two-thirds of it is accounted for with wood-based side-streams of the forest industry and forest management. However, the increasing use of forests for energy production is not unproblematic regarding carbon dioxide emissions, biodiversity and other environmental impacts (e.g. Vanhala et al. 2013). The energy sector accounts for most (75%) of Finland's greenhouse gas emissions. Although emissions have dropped since 1990, the goal of carbon neutrality is still far from being achieved (Statistics Finland 2016).

In the PATH2030 survey, the sustainability of energy production and consumption became the second most prominent area in which Finland needs to improve from the perspective of achieving sustainable development (74% of respondents). The open responses highlighted a wide variety of differing views on the sustainability of energy production methods. In general, the challenges were seen to be the increase in energy consumption and the lack of governance tools to control this. According to the interviewees with the ministries¹⁶, the development of the energy system is very EU-driven. Challenges are related, for example, to the growth of traffic performance and the aging of the car fleet, attitudes opposed to change expressed by businesses and by private individuals, and contradictory views on bioenergy. Key initiatives contributing to the sustainability of the energy sector include the Energy and Climate Roadmap and Strategy¹⁷, the work of the Transport Climate Policy Working Group (ILMO45) and the implementation of the Finnish Medium-term Climate Change Policy Plan (KAISU). However, some interviewees felt the change is too slow.

Sustainable use of forests

According to Finland's sustainable development indicators, new growth of trees has remained strong, but there is not enough decayed wood in forests (see e.g. Kuusela & Punttila 2017, Korhonen et al. 2016). In the survey, biodiversity and the use of forests as carbon sinks was the third most cited area in which Finland should improve (63% of respondents). Respondents wrote abundant comments in the survey's open section related to the sustainable use of forests. The comments showed that there are major differences in perspectives on the sustainable use of Finnish forests, forestry and forest policy among experts of sustainable development. For some respondents, the sustainable use of forests meant using wood as raw material and energy. Others, however, felt that Finland's current forest industry poses a threat to forest carbon sinks and biodiversity.

Some of the interviewed ministry experts¹⁸ related that international efforts in favour of forests are driven by, inter alia, biodiversity negotiations and the implementation of SDG # 15 (Life on Land). Experts believe, however, that this could be improved at the national level because, firstly, a significant proportion of endangered species habit in forests, and secondly, strategies considering forests are partly contradictory (e.g. Finland's National Forest Strategy, the Finnish Bioeconomy Strategy and Finland's Biodiversity Action Plan); the lobbying of different interest groups was seen as very forceful. On the other hand, some interviewees said that Finnish forests are healthy and that their use does not pose a challenge to sustainable development. These interviewees underlined that, according to the monitoring

¹⁶ Interviews: Ministry of Transport and Communications, Ministry of Economic Affairs and Employment, Ministry of the Environment

¹⁷ <https://tem.fi/en/energy-and-climate-strategy>

¹⁸ Interviews: Ministry of Agriculture and Forestry, Ministry of the Environment

data of the National Forest Strategy, the increment value and turnover of the forest industry have increased. Key initiatives to promote the sustainable use of forests include the National Forest Strategy 2025 and the Forest Biodiversity Programme for Southern Finland.

Sustainability of Finland's aquatic ecosystems

According to national water protection indicator data, point source discharges into waterways have clearly decreased in Finland in recent decades, but there are still major challenges in managing diffuse, non-point source loading. According to national indicators, the amount of nutrients (nitrogen and phosphorus) transported by Finnish rivers into the Baltic Sea have remained relatively unchanged from the 1970s to the present day. The Finnish sea areas still suffer from eutrophication; the state of the Archipelago Sea and the Gulf of Finland is particularly alarming (Korpinen et al. 2018). Increasing oil and chemical transportation in the Baltic Sea poses a growing environmental risk. According to the SDG Index indicators, the biodiversity of the Finnish territorial waters as well as the purity of water is deteriorating. In the PATH2030 survey, the number of answers received for the option 'Baltic Sea and Inland Waterways' was the fifth highest (47% of respondents).

The open responses of the survey raised concerns about the pollution of the Baltic Sea, but also pointed out the improved status of inland waters. According to ministry experts¹⁹ 15, many efforts have been made to improve the state of the Baltic Sea, such as Finland's Marine Strategy, key projects on Finnish waters and marine environment, and nutrient recycling programmes (Raki and Raki2). Despite these efforts, nutrient emissions from agriculture and, in particular, the eutrophication of coastal waters, pose challenges. Also, climate change and the spread of non-native species were mentioned in the interviews as threats to the sustainability of aquatic ecosystems.

Sustainable food system

Neither of the sustainable development indicator systems measures the development of the food system directly, but there are indicators for sustainable food production and consumption in different parts of the indicator systems. As Caron et al. (2018) suggest, each SDG relates to food in one way or another and food production and consumption should be examined as a complete system from primary production to consumption. The Finnish food system has been successful, for example, in eradicating hunger, improving food security and improving nutrition (SDG # 2). However, many other objectives still face challenges. Food production is responsible for more than a quarter of global greenhouse gas emissions (e.g. Tubiello et al. 2015). For example, the use of fertilisers is reflected in the SDG Index as an indicator of the efficiency of nitrogen use, and in national indicators as nitrogen and phosphorus loads into the Baltic Sea. Finland should improve on both indicators. Food is an important and multidimensional part of consumption, which according to both indicator systems is one of the biggest challenges for sustainable development in Finland. Also the number of overweight people and the balance within the consumption of different food product categories (vegetables, meat, fish) shows signs of decreasing sustainability.

In the PATH2030 survey, the sustainability of the Finnish diet was the sixth most cited area in which Finland should improve in terms of sustainable development (43% of respondents). The open responses highlighted, among other things, the adverse environmental and health impacts of dietary habits, and the consumption and production of food of animal origin. Some respondents believe that there is hesitancy to speak up on the problems and impacts

¹⁹ Interviews: Ministry of Agriculture and Forestry, Ministry of the Environment

of food production. Some of the ministry²⁰ experts also felt that the national debate has kept silent on food and its impacts, as has the 2030 Agenda report (PMO Finland 2017a). According to these interviewees, the challenge lies in the strong contradictions in the perspectives, the difficulty in influencing personal food choices and the cross-sectoral nature of the topic, because food links to diverse areas such as health, equality and the state of the environment. Key initiatives to increase the sustainability of the food system have included the Government Report on Food Policy and nutritional recommendations.

Equality and inclusion

The inequality of Finnish society is manifested in many ways in the national sustainability indicators, for example, in income disparities, inclusion, marginalisation and faith in the future. Social inequalities have increased, although Finland is doing well by international comparison. This is reflected in Finland's success in the SDG Index compared to national indicators. According to both indicator systems, there is work to be done in, for example, closing the gender pay gap and in reducing the number of young people not in employment, education or training. In the PATH2030 survey, economic inequalities and marginalisation in Finland received the fourth highest rate of mentions (52% of respondents). The open responses highlighted the declining trend of equality, although some respondents considered equality and participation a strength for Finland. However, the development of economic, gender-related and regional inequalities was mainly perceived as a cause for concern. According to ministry experts²¹, inequalities are increasing problematically. In particular, urgent challenges are the rapid diversification of the population and the difficulty of identifying people with special needs. In addition, more freedom of choice can contribute to inequality and differentiation among population groups. Recent important initiatives in this area have included the Youth Guarantee commitment, the Equal Pay Programme, and the Ministry of Education and Culture's programme to prevent hate speech and racism and promote social inclusion.

Some of the key issues of sustainable development require more comprehensive policy action than is currently the case. These include cross-cutting themes that are central to sustainable development and that have not yet been comprehensively addressed as unified entities. The most significant factor in this evaluation was the global footprint of Finnish consumption.

Global footprint of Finnish consumption

In both indicator systems, consumption indicators are marked red, meaning the worst possible status. Indicators mainly measure domestic consumption, but the sub-indicator to SDG #12 (Responsible Consumption and Production) on the SDG Index, which measures sulphur dioxide emissions from imports, also shows red. The SDG Index also includes estimates of the so-called spillover effect. It tells us to what extent countries have negative effects on the environment, economic development or security outside their national borders, thus undermining the ability of other countries to reach SDG targets. Finland, like other EU countries on average, is responsible for a significant negative spillover effect, whereas in many African countries, for example, the impact on the outside world is very small (Sachs et al. 2018). In the survey, the respondents felt that the global footprint of Finnish consumption was the biggest challenge for sustainable development (75% of respondents). In the open

²⁰ Interviews: Ministry of Agriculture and Forestry, Ministry of Social Affairs and Health, Ministry of the Environment

²¹ Interviews: Ministry of Justice, Ministry of Education and Culture, Ministry of the Interior, Ministry of Social Affairs and Health

responses, many were worried about consumption and the emissions derived from it. In addition, the respondents were concerned about Finland's dependence on foreign raw materials. In the ministry interviews²², consumption was cited as an important topic, especially in the field of energy and natural resources. The survey identified inequality and over-consumption as challenges, along with the current policy's failure to address these problems sufficiently. The far-reaching effects of consumption are also strongly linked to current approaches to work and the economy. The initiatives that seek to address the global footprint of Finnish consumption include a sustainable consumption and production programme and a circular economy roadmap. The social impacts of Finnish consumption were also addressed at stakeholder workshops. These can be influenced by policies related to human rights and responsibility in the private sector.

3.2. Evaluation of Finland's sustainable development policy

3.2.1. Theory of change

This section answers the following detailed evaluation questions:

- What are the most important aims and methods of Finland's sustainable development policy?
- How are these understood in practice among the most central stakeholders?
- What is the theory of change underpinning Finland's sustainable development policy?

The theory of change (ToC) in Finnish sustainable development policy (Expert Panel on Sustainable Development 2018, Weiss 1997) was first and foremost analysed by focusing on the most central document, the 2030 Agenda report (PMO Finland 2017a), policy instruments for sustainable development²³, and the views of representatives of ministries and experts. The goal of the ToC analysis is to understand what a policy process entails, and how and when different steps are expected to be realised. The mechanisms and phases of this change have been found to be obscured by the wide-ranging transformation processes to which sustainable development policies belong (Chen & Rossi 1989). In this evaluation, the analysis of the ToC seeks to clarify not only the official goals of policy, but also the ways in which key agents perceive them (Weiss 1997).

The analysis shows, above all, the **lack of clarity in the theory of change** regarding sustainable development policy. For example, the 2030 Agenda report, which focuses on sustainable development policy (PMO Finland 2017a), has very broad and general objectives²⁴. Although the report lists a variety of measures to achieve the goals, **no plausible path between measures and objectives has been created**.

The ambiguity of the theory of change was also reflected in the interviews with experts and representatives of ministries²⁵. Their views emphasised on the one hand the **broad and in-**

22 Interviews: Ministry of Transportation and Communications, Ministry of Agriculture and Forestry, Ministry of Social Affairs and Health, Ministry of Finance and Ministry of the Environment

23 Key actions, agents and policy instruments are described in more detail in Chapter 2 and will be analysed in more detail in section 3.2.2.

24 The 2030 Agenda Report (2017) lists aims for implementation (p. 13) which are the vision of Prime Minister Sipilä's Government Programme (2015) ("Finland is an inventive, caring and safe country where we all can feel important.") and the vision of the National Commission on Sustainable Development in Finland in 2050 ("A prosperous Finland with global responsibility for sustainability and the carrying capacity of nature").

25 The question asked about the strengths and weaknesses of Finland's sustainable development model, both in principle and in practice.

clusive nature of the model, and on the other hand its **complexity and administrative focus**. The model emphasises inclusion, creation of conversational links and, more recently, the mainstreaming of sustainable development. This happens at the expense of other possible elements of change, such as ambitious, concrete target setting or challenging agents and stakeholders related to the topic.

Some experts saw links between Finland's sustainable development model and a multi-level perspective on **transitions** (Geels & Schot 2007) that has been used widely as a model of societal change. Interaction between different levels of society is essential in the model. Previous research has found that the Finnish model, to some extent, supports innovative grassroots initiatives and experiments (*niche*), especially through the Commitment2050 tool (Lyytimäki et al. 2019). Changes related to the management, monitoring, measurement and evaluation of sustainable development policy²⁶, on the other hand, may affect Finland's political system (*regime*). Overall, at least among key agents, Finland's long-term work on sustainable development has contributed to sustainability becoming a broadly shared and accepted objective, – the importance of which is rarely questioned (*landscape*).

Transition theory has been criticised for over-emphasising the impact of grassroots activities and overestimating their ability to change the system (e.g. Berkhout et al. 2004). In addition, the Finnish model of sustainable development has one major difference compared to the transition model: in Finland, sustainable development policy has, during the period of examination, **emphasised the search for cross-sectoral understanding and low-threshold participation rather than promoting societal change**. This is reflected, for example, in the approach of the Commitment2050 tool, where different agents can report on their own voluntary sustainability targets.

It is important to note that the core content and objectives of Finland's sustainable development policy – let alone its means – do not enjoy full mutual understanding. Different parties involved have **many different, vague and unspoken ways of perceiving sustainable development, but there is a lack of clear and shared theory of political change**. This typifies processes such as sustainable development policy (Weiss 1995, Stame 2004).

Differentiation begins with the definition of sustainable development – but there are differences also in the extent to which sustainable development is accompanied by, for example, the need for more transformative policy. In terms of definition, the traditionally used distinction between three pillars – economic, environmental and social sustainability – still seems to be the most widespread way of perceiving sustainable development, for example, through the ministry interviews. However, recent sustainability research has questioned the equal emphasis of three pillars (e.g. Raworth 2017, Kates 2001). Pillar thinking has in practice led to economic sustainability being the most important goal, and environmental and social goals have received less attention (the so-called Mickey Mouse model).

However, with the adoption of the 2030 Agenda, seventeen SDGs have begun to increasingly affect sustainable development thinking, and many representatives of central administration are using them in the international work of their own sector. The SDGs have been criticised, however, for covering everything possible, and for being difficult to measure (Swain 2017). The SDGs are based on pillar thinking, but they are widely known and have brought sustainability thinking back to the core of societal debate.

²⁶ Incl. the development of indicators for sustainable development, reporting in government annual reports and evaluating the approach to sustainable development in state budget proposals.

Further, compared to the SDGs, the eight national targets, for Finland's latest sustainable development strategy (Finnish National Commission on Sustainable Development 2016) are poorly known. Many experts who were interviewed, as well as workshop participants, considered it challenging that sustainable development continues to be classified differently on the national level than the SDGs. In this context, Finland's eight targets for sustainable development (Finnish National Commission on Sustainable Development 2016) and the ten indicator baskets (Appendix 1, which is available in Finnish) were considered unclear and confusing. Instead, concise selections such as the focus points²⁷ presented in the Government's 2030 Agenda report (PMO Finland 2017a), or comprehensive models that can be visualised (e.g. the doughnut model, Raworth 2017; see Box 2), were considered clear.

3.2.2. Realisation of key objectives and means

This section answers the following detailed evaluation questions:

- How will the central aims and methods of sustainable development be realised?
- Do the central policy actions have an impact on the status of sustainable development?

The realisation of Finland's targets and means of sustainable development policy has been evaluated in surveys. Respondents gave an average school score of 7, meaning **satisfactory** (with 4 being the worst and 10 the best) to the **general state of sustainable development** in Finland (see Figure 6). Those who work more frequently with sustainable development seem to give on average higher ratings to the general state of sustainable development in Finland than those who rarely deal with the question. This observation, however, could not be fully proven with the used data. More information on the survey and its statistical analysis may be found in Appendices 3 and 4, which are available in Finnish.

²⁷ 1) A carbon-neutral and resource-wise Finland and 2) securing non-discrimination, equality and a high level of competence in Finland

Focus areas and policy principles

As noted in the analysis on the theory of change (Chapter 3.2.1), it is worthwhile to reflect on the realisation of the focus areas and policy principles of the 2030 Agenda report (PMO Finland 2017a).

A good conception of the **fulfilment of policy principles** was obtained, especially through the expert and ministry interviews, but also through the workshops and the open responses in the survey. The results are presented in Table 6. The material shows that the policy principles outlined in the 2030 Agenda report are perceived as relevant in the context of sustainable development; they can be used also in different ways to make strategically, slightly different sustainable development policy.

Based on the indicator analysis presented in Chapter 3.1 and supplemented by material collected in the survey, interviews and workshops, it can also be concluded that the **focus areas** of sustainable development in Finland have been meaningfully defined: Finland still has much to do in order to achieve the goals of sustainable development related to carbon neutrality and resource wisdom, also in global comparison. In terms of non-discrimination, equality and competence, Finland is performing well in global comparison, but efforts to maintain a good level and achieve the set goals require increased efforts.

Thus, in this evaluation, we were able to examine the current situation and trends in the focus areas, and to identify issues of particular concern that should be addressed if sustainable development objectives are to be achieved. On these issues, we briefly reviewed the steps that have been taken in Finland to address the challenges. However, **the material in this evaluation was not able to provide an accurate, sufficiently comprehensive and diverse evaluation of the extent to which current measures have managed to promote issues** such as the sustainability of the energy system or issues related to equality and inclusion, and which specific measures should be taken on these issues to achieve the targets²⁸. Policy evaluation is therefore general, focused on the big picture and cross-sectoral issues – and the same applies to policy recommendations made on the basis of the work.

Furthermore, there were **no clear links between the data on sustainable development policy in Finland, such as the activities of the National Commission on Sustainable Development or the Expert Panel, and the concrete impacts on environmental, economic or social spheres of development**. Instead, the evaluation supports the idea that Finland's sustainable development policy has influenced discourse and thinking habits, for example, in ministries, information on the state of sustainable development in Finland and its development potential, the emergence of a common language as well as cooperation forums and management practices.

²⁸ Such an evaluation would have required intensive case-related familiarisation, examining futures scenarios, and also a broad participative process in all key areas and sectors of sustainability, especially in a number of challenging, or especially promising, substantive issues.

Table 6. Implementation of the policy principles of the 2030 Agenda report

Ownership and participation	<p>Sustainable development has been accepted widely as an aim in Finland. However, in practical matters, the interpretations of sustainability may vary significantly.</p> <p>The opportunities for participation by different parties are considered quite good. Political institutions driving sustainable development in Finland have been formed so that they offer broad participation possibilities for different parts of society. The Commitment2050 tool strengthens multi-stakeholder participation. However, the participation of certain groups, such as young people, should be strengthened. Municipalities and cities are experiencing a lack of state support.</p>
Policy coherence and global partnership	<p>Finland's policy model for sustainable development is constructed in an exemplary manner, and policy coherence works well in Finland at the target level. In practice, however, there is ample room for improvement in coherence, for example, in relation to the challenging substantive issues identified in this evaluation. Often, the barriers to coherence are formed by rigid structures, but also by conflicts of interest.</p> <p>The challenge is also that the global effects of Finnish politics, or the interactions between different policy areas, are not perceived or evaluated well enough.</p>
Long-term action and transformation	<p>Based on the evaluation, short-term objectives are emphasised at the expense of long-term objectives in both decision-making and publicity, and the impacts of the decisions taken are not recognised sufficiently.</p> <p>Many hope for more transformative policy and mechanisms that would create debate on challenging issues, for example in the decision-making processes of the government and ministries.</p>

Central administration operations

From the perspective of assessing and developing sustainable development policy, it is essential to understand how the idea of sustainable development is reflected in the key strategy, planning, management and reporting documents, and activities of the administration. Appendix 8 describes in more detail the implementation of sustainable development in the central administration.

While sustainable development policy has a long tradition, **only recently has the perspective become part of the activities of all ministries**. Based on the material of this evaluation, ministries and their agents can be categorised into different groups based on the adoption and implementation of sustainable development²⁹.

1. **Newcomers:** For some ministries, sustainability is still a new, thought-provoking perspective that has the capacity to develop concrete conduct.
2. **Recognisers:** Some ministries have taken the next step from initial enthusiasm, but the importance of sustainable development for one's own activities has not been comprehensively understood and has not been extensively implemented within the ministry. Some find it challenging to identify and determine the activities that lie at the core of sustainable development because almost everything can promote sustainability.
3. **Pioneers:** There are many actors in the ministry landscape for whom sustainable development has been a central issue for years or even decades. Some of the ministries with a long track record on sustainable development efforts believe that sustainable development no longer has much to offer them because they have already digested its central message; they now use updated and more concrete concepts to develop their operations.
4. **Challengers:** On the other hand, there are also ministries for which sustainable development is still loaded with controversy, including "discomfort with the ways how common things have been dealt with in the past"³⁰ and where "sustainable development is disconnected from other aims".

According to the analysis carried out in this project, **sustainable development has been reflected more frequently and more extensively in the documents that guide and evaluate the activities of the central administration**; in particular, there has been a change after 2016. For example, the follow-up of the 2011–2015 Government Programme and the 2015 Government Annual Report were mainly focused on the problems of their time, such as the economic deficit and migration (PMO Finland 2015b, 2016a). For the first time in the 2016 Government Annual Report, sustainable development was addressed in its own chapter (PMO Finland 2017c, 2018b). The change is reflected in how sustainable development and the 2030 Agenda describe not only development and foreign policy, but also international cooperation, the environment and the economy, i.e. with a wider social scope than in previous documents. The changes highlight the importance of sustainable development policies in governance, and that **the 2030 Agenda has been very important for the visibility of sustainable development**.

Sustainable development has been particularly well considered in ministries at the strategic level. Its importance as a strategy for structuring strategy papers will increase in the future (Table 7) (see Appendix 9 for more detailed results in Finnish). However, often sustainability is approached as part of another, narrower theme, such as the sustainable use of natural resources, security or the economy, not necessarily in a holistic way.

²⁹ This distinction is made to illustrate the different levels of mainstreaming and the attitudes towards sustainable development. However, it should be noted that many ministries are also heterogeneous bodies internally with regard to these issues: the degree and approach of mainstreaming may vary, for example, between departments or units. The division was also done by interviewing a rather limited number of experts. As a result, ministries have not been placed into categories. However, the breakdown can help to develop an approach to sustainable development so that it can benefit and also benefit from the diversity of the ministries.

³⁰ These are citations taken from interviews with ministry representatives.

Table 7. Sustainable development in ministerial management systems³¹

Strategy level	The strategies of almost all ministries have considered at least one dimension of sustainable development. Few strategies, however, are structured around sustainable development. Several ministries are planning to implement a more holistic approach to sustainable development in their future strategy.
Performance management	In all ministries, sustainable development has been included in performance management, at least to some extent and in some units. However, only two ministries have considered it more broadly as part of the performance management of all units. One ministry is taking sustainable development into account in the coming year.
Executive team	Sustainable development has been a theme discussed by the executive team in five ministries in the past two years. However, the 2030 Agenda has not been addressed directly in any ministry; the national 2030 Agenda report in only one. In three ministries, sustainable development has surfaced as part of another topic; in one ministry it has not been addressed at all. All in all, sustainable development has been addressed twelve times at least on some level in a total of eight ministries.

In practice, ministries have organised their work on sustainable development in different ways. Most ministries have one official who, alongside his or her other work, participates in the Sustainable Development Coordination Network. The interviews also stressed **the importance of resourcing and engaging agents extensively within ministries** so that the contact person is not overburdened with the implementation of the reform measures which are often extensive. If the contact person changes, the continuity of the work should not be compromised. If sustainability were seen more broadly in practice as one of the strategic goals at the core of ministerial activity, then it might ignite a more active approach to sustainable development policy instruments. Currently, ministries are largely waiting for the Coordination Secretariat to ask them to act, even though the ministries could also propose, for example, their own strategically significant reforms to the National Commission on Sustainable Development or to the Expert Panel on Sustainable Development.

According to the interviews, in addition to the Government Annual Report, the **examination of sustainable development in the draft budget process** has contributed to the visibility of sustainable development in the ministries. The focus areas outlined in the the 2030 Agenda report were elevated to the main title justifications of the state budget proposal for 2018 (Ministry of Finance 2017, 2018b). In the 2019 budget proposal, the objectives, actions, funding, taxes, and harmful subsidies of the focus of a "carbon neutral and resource-wise Finland" were also considered as part of the general budget justifications. The focus on "non-discrimination, equality and competence" is to be included in the general justifications for the forthcoming budget proposal.

Reviewing the state budget proposal also provides a good opportunity to assess the concrete commitment of the government to promoting the goals of sustainable development. Measures that were deemed counterproductive in the ministry interviews included subsidies

³¹ The results of the table are based on the following questions to the representatives of all ministries: 1) How is sustainable development and the implementation of the 2030 Agenda recorded in your ministry strategy? 2) How has sustainable development and the implementation of the 2030 Agenda been incorporated into the performance management processes of your administration? 3) Have sustainable development and the implementation of the 2030 Agenda been addressed by your ministry's management team over the past two years? There were nine responses to the questionnaire, out of a total of 11 ministries.

that are environmentally harmful, the amounts of which were first considered in the 2019 budget proposal as part of the move towards a "carbon-neutral and resource-wise Finland". In the budget proposal, environmentally harmful subsidies are subsidies that lead to an increase in the use of natural resources and environmental pressures in a subsidised enterprise or a branch of industry. However, environmentally harmful subsidies can have significant economic and social benefits. The amount of the subsidies has been estimated on the basis of previous studies. Approximately EUR 3.5 billion worth of environmentally harmful subsidies are paid, mostly to the energy, transport and agriculture sectors. By comparison, in the 2019 budget proposal, the subsidies for carbon neutrality and resource-wisdom were a combined total of approximately EUR 1.7 billion (Ministry of Finance 2018b), which is only about half the amount of the harmful subsidies.

Coordination model of sustainable development and policy instruments

Although the status and politics of sustainable development in Finland as a whole were criticised in the material of this evaluation (see, for example, the ratings for sustainable development policy and status in Figures 6 and 7), **the coordination model of sustainable development (Figure 3, p. 16 also received many positive evaluations and it has a good international reputation.** The establishment of the 2030 Agenda Coordination Secretariat at the Prime Minister's Office, the sustainability assessment of the budget proposal, the Government's 2030 Agenda Report (PMO Finland 2017a), and its associated cooperation with the Committee for the Future, as well as the Commitment2050 tool and the Agenda 2030 Youth Group were considered important reforms during the period of examination. Regarding the older aspects of the coordination model, special mention was made of the Prime Minister-driven leadership and broad participation of the National Commission on Sustainable Development.

In the light of this evaluation, there is nevertheless considerable pressure to develop the functions of the National Commission on Sustainable Development, the Expert Panel, the monitoring network, as well as the indicators. Although a multifunctional model has strengths, the complexity also blurs the big picture somewhat. The material would justify combining policy instruments of sustainable development policy and development policy, or at least it would justify deepening their cooperation, since the global impact of national action is at the core of both systems. There are also good reasons for consolidating cooperation between the National Commission on Sustainable Development, the Expert Panel and the Monitoring Network. Networks of administration, research and practical work are now working too loosely and overlapping in the current coordination model.

All in all, a separate sustainable development coordination model was criticised in some interviews, for example, for **excess administrative work and a lack of coherence.** In an ideal situation, sustainability would be taken into account in all operations in an integrated and cross-sectoral manner. However, the mainstreaming of such sustainability is not yet in that advanced state. While it would be a good idea to aim to make the existence of different policy instruments for sustainable development unnecessary, we are still at a stage where many existing instruments need to be reinforced rather than scrapped.

On the other hand, in the workshops and interviews, the city representatives hoped for concrete support for the **launch of the 2030 Agenda work of cities and municipalities** at the strategic level. Although various ministries are running urban and sub-regional development programs, there is not sufficient interaction between the local level and the government, according to interviews and workshops. The commitment of the state and the local level to sustainable development and coordination between levels of administration is critical to

achieving the 2030 Agenda goals (OECD 2018a). In particular, coordination and guidance are needed for the goal setting, implementation and monitoring of sustainable development.

The evaluation process also highlighted the **important role of investments and innovation support as part of a sustainable development policy**. At the moment, there is no precise information on to what extent governmental support for innovations contributes to achieving sustainable development goals. However, the role of innovation in achieving sustainability is estimated to be significant. The ongoing KITA project³² will examine this theme more closely. However, based on this evaluation, it is known, for example, that the Ministry of Economic Affairs and Employment is working to promote the development of innovation ecosystems that support sustainable development, including organisations, companies, cities and research institutes, of which sustainable growth is at the core, e.g. The Technical Research Centre of Finland's (VTT's) objectives. In terms of public investment, the state-owned investment company Tesi has made sustainable development one of its strategic goals³³, and sustainable development is part of Finnvera's business principles³⁴. On the other hand, the objectives of the Finnish State Development Company (Vake) and Business Finland do not explicitly mention the promotion of sustainable development^{35,36}, although several programmes are aimed at themes of sustainable development. With the right strategic public and private-sector cooperation models, the share of private capital could be considerably greater, ensuring a greater overall effect.

An analysis of Finland's sustainable development coordination model and policy instruments is described in Appendix 10, which is available in Finnish.

3.2.3. The strengths and challenges of Finland's sustainable development policy

This section answers the following detailed evaluation questions:

- Does the achievement of central aims pose challenges? What are the challenges and existing strengths?
- How can policy be evaluated with regard to coherence, coverage, and relevance?
- What is or what could be the additional value of sustainable development policy?

Strengths and challenges in the 4Is analysis

The challenges of implementing sustainable development policy, but also the strengths, are linked to a number of different themes within the 4Is framework (Brockhaus & Angelsen 2012) (Table 8), where the components of social change are examined from the perspective of institutions, interests, ideas and information. The table summarises, in particular, the findings of expert interviews, supplemented by views from the survey and workshop material.

32 The KITA project (Government's analysis, assessment and research activities) is focused on supporting the implementation of the 2030 Agenda by improving sustainable development in four sectors. KITA studies the market opportunities for innovation in sustainable development and makes recommendations for the development of innovation and enterprise policy measures for sustainable development. https://tietokayttoon.fi/hankkeet/hanke-esittely/-/asset_publisher/kestavan-kehityksen-innovaatiot-tukemassa-agenda-2030-n-toimeenpanoa-kita (in Finnish)

33 <http://www.industryinvestment.com/about-us/news/news-archive/>

34 <https://www.finnvera.fi/en/>

35 <https://vake.fi/enhome/>

36 <https://www.businessfinland.fi/en/for-finnish-customers/about-us/strategy/>

Table 8. General state of Finland's sustainable development policy, structured according to the 4Is framework (Brockhaus & Angelsen 2012)

Institutions	<p>Sustainable development institutions (policy instruments) are well- structured in Finland, and the operational model is generally considered to be good, motivating commitment and participation. However, the model is poorly resourced. The core actors and many implementers of sustainable development, for example in the ministries, have insufficient financial and temporal resources, which contributes to undermining sustainable development for other tasks and interests. This is also reflected in activities where sustainable development is fairly well integrated in strategies and also in many important tools for performance management, reporting and evaluation, but not necessarily in practical decisions.</p> <p>In practice, political measures are often seen as short-sighted, ineffective and partly contradictory with objectives from the viewpoint of sustainable development. Regarding policy coherence, one of the key challenges is that actors and sectors work in separate silos: it is difficult to ensure that knowledge, decisions and measures are compatible with each other and that their interconnections are considered.</p>
Interests	<p>The interests and goals of interest groups are strongly reflected in key political questions relevant to sustainable development. Conflicts of interest lead to a disconnect between broad objectives of sustainability and practical measures. The mainstreaming of sustainable development has progressed at the level of attitudes. However, in decision-making, other goals will easily overlook sustainable development. In particular, short-term financial interests have a strong role to play. There is also a lack of will or courage to raise difficult topics for political consideration, and they are postponed, for example, until the next electoral term.</p> <p>Maintaining discussion between the different parties is an essential – though not sufficient – condition for overcoming conflicts of interest. If sustainable development policy is to be more vigorous, there is a need for policies that have a strong direction but that are also considered to be fair. In addition, there is a need for courageous experiments and a solid knowledge base to resolve conflicts in future-proof ways.</p>
Ideas	<p>At the level of ideas, sustainable development is a broadly shared and accepted aim. However, when moving from mere concepts to a more concrete direction disagreements may arise. For example, contradictions between objectives and measures of different administrative sectors emerge. It is also possible to isolate individual goals that are being promoted in a way that is irrelevant to the 2030 Agenda as a whole, or even contrary to it. There is no shared vision or plan for implementing the 2030 Agenda objectives.</p>
Information	<p>There is plenty of information available on sustainable development, but the challenge is to crystallise information to describe large entities and slow changes, for example by means of indicators. Existing systems of</p>

	<p>sustainability indicators are structured on different principles and are perceived as confusing.</p> <p>On the basis of the material, there is a particular need for independent, multidisciplinary and synthesising research data that can be used as a basis for decision-making. Knowledge should flow both ways, so that sustainable development can in practice be implemented and mainstreamed into all of society. Today, the use of selective information based on one's own interests is one of the major challenges of mutual understanding.</p>
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Policy coherence, coverage and relevance

In this section, Finland's strengths and challenges in sustainable development are assessed through perspectives that are typical of policy research: coherence, coverage and relevance. Policy coherence is the approach that is particularly critical for sustainable development policy (see Box 1; Appendix 13 and its background literature, which is available in Finnish), therefore it is discussed in most detail. Coverage and relevance are only briefly assessed.

Institutional mechanisms that allow and strengthen policy coherence play a crucial role in the successful implementation of sustainable development objectives. In this case, it is essential that the goals of sustainable development are an integral part of existing administrative institutions and are integrated into their activities, and that administrative culture nurtures intergovernmental cooperation and is actively engaged in global responsibility. According to the OECD (2017, 2018a, 2018b) estimates, Finland has successfully adopted elements of all eight policy coherence elements (see Box 1). These factors are evaluated in the light of our material.

In the Finnish model, political commitment to sustainable development is demonstrated by the Prime Minister-led responsibility in the National Commission on Sustainable Development, active international reporting to the UN33, the national report completed among the first countries, and the commitment to policy coherence in the government report³⁷. However, the Prime Minister's leadership can be seen partly as ritualistic, and the report can be criticised for containing mainly the goals already listed in Government Programmes and other strategies.

From an international point of view, cross-sectoral governmental cooperation in sustainable development policy in Finland is, for example, relatively good in ministries. However, the tendency to operate in a secluded manner in ministries is a key problem. More high-level ministerial cooperation would be needed to direct the planning, budgeting and legislation of the various sectors of government in the direction of sustainable development. Focusing on issues or phenomena relevant to sustainable development should be included, for example, in budgeting. The systematic evaluation of the interaction between different policy areas needs to be increased (for example by applying the method described in Appendix 13). As outlined in more detail in the chapter on foreign policy (Chapter 3.3), the problem of policy coherence is that the impact of Finland's actions on the rest of the world is not sufficiently taken into account. The Government's 2030 Agenda report has decided to investigate the use of a sustainability impact assessment tool in drawing up legislation (PMO Finland

³⁷ High Level Political Forum on Sustainable Development; <https://sustainabledevelopment.un.org/hlpf>

2017a). Such a tool could increase knowledge of the interconnection of activities between different administrative sectors. Both monitoring information and impact assessment should be better linked to decision-making.

Finland is one of the nine countries that have put sustainable development coordination at the core of government (Prime Minister's Office) (OECD 2018a). In addition, Finland's strengths include a coordination network gathered from ministry representatives. The commitment of the ministries to the Sustainable Development Coordination Network is weak in parts (often based on one person) and reactive. In addition, the human resources of the Coordination Secretariat are very limited and, for example, have no mandate to resolve conflicts between administrations.

The 2030 Agenda's target year is just under three electoral terms. Despite long-term plans, decisions are typically made with a focus on short-term goals at the expense of long-term goals. Mechanisms for better and systematic use of research data in policy making and policy preparation for sustainable development need to be improved. One solution to this is to strengthen the role of the Expert Panel on Sustainable Development (see Appendix 10, which is available in Finnish). In order to improve the knowledge base of sustainable development policy, the reorientation of research resources to the themes of sustainable development and the enhancement of multidisciplinary understanding is justified, for example, in the case of the Strategic Research Council (STN) and the Government's Analysis, Assessment and Research Activities (VN-TEAS).

To summarise, Finland's sustainable development policy can be considered to be successful overall in the light of this evaluation. It has promoted objectives relevant to sustainable development goals through meaningful means. However, since ownership and participation have, to some extent, been executed at the expense of coherence and transformation, policy measures could be more comprehensive: they could aim to develop and implement a strong and clear theory of change, in practice some kind of strategy or road map.

Added value

On the basis of this evaluation, the added value of a sustainable development policy lies in particular in the following issues:

1. **Securing a long-term political perspective that surpasses electoral terms.** In this respect, sustainable development has links but also potential overlap with foresight work.³⁸
2. **Promoting global responsibility and opportunities.** This is also the clue to the cross-sectoral aspects of foreign policy.
3. **Promoting cross-sectoral cooperation, developing mechanisms affecting all policy, and creating a common language and awareness.** This aspect is also being promoted at the moment by the Prime Minister's Office's Strategy Department, which should be better taken into account in future.
4. **Enhancing broad societal participation in politics.** This point of view is also present in many other contexts, but the National Commission on Sustainable Development, for example, is exceptional in bringing civil society representatives to the

³⁸ E.g. Futures reviews for the branches of government, <https://vnk.fi/en/foresight/futures-reviews>

same meetings with the Prime Minister. The Commitment2050 tool also has the potential to promote broad inclusion.

5. **Understanding the status and interdependencies of various issues relevant to society's development and future.** Essential aspects in this regard are not only monitoring and measuring, but also other mechanisms that make the scientific community's voices heard in politics. This important point of view should be taken into account not only in the development of policy instruments for sustainable development, but also in the development of scientific advice.

The most important of these various aspects of added value of sustainable development policy during the period of examination have been the production of broad-based inclusion and common language, the development of mechanisms affecting the policy mix, and also the introduction of a global perspective through the 2030 Agenda framework. However, the added value of sustainable development policy could be to focus policy even more on the achievement of international sustainable development goals and to improve policy responsiveness and coherence.

3.3. General evaluation of sustainable development in the foreign policy of all administrative branches

This chapter addresses the following targeted evaluation questions:

- How are the human rights-based approach and the Leave No One Behind principle of the 2030 Agenda realised in Finland's sustainable development policy?
- How coherent is Finland's foreign policy in terms of achieving the sustainable development goals (SDGs)?
- Does Finland's policy model support the coherence of sustainable development policy outside Finland and in the different administrative branches of foreign policy?
- What realistic measures are required to improve the coherence and effectiveness of external policies in the implementation of the 2030 Agenda significantly in the short, medium and long term?

Internationally, Finland is a well-respected country that holds the third place on the Center for Global Development 2018 Commitment to Development Index (CDI), after Sweden and Denmark³⁹. Many of the challenges Finland faces in implementing the SDGs are related to the broad-based nature of SDGs and challenges in coordination. Many other countries are also faced with these challenges. In accordance with the research assignment, we will assess how coherent foreign policy is in achieving the targets of sustainable development and whether Finland's policies support the coherence of sustainable development policy outside Finland and in the different administrative branches of foreign policy. Moreover, we assess how are the human rights based approach and the Leave No One Behind (LNOB) thinking of the 2030 Agenda is realised in Finland's sustainable development policy.

In principle, this assignment could encompass all the work performed by the Ministry for Foreign Affairs and a large portion of the work performed by other ministries. Due to limited resources, one topical theme was chosen in this report to serve as a broad case study i, i.e., the private sector -related foreign policy. This makes it possible to conduct an analysis of

³⁹ cf. <https://www.cgdev.org/commitment-development-index-2018>. cross-administrative foreign policy refers to national foreign policy (incl. development policy) themes, which concern the branches of two or more ministries, at least in certain key areas.

foreign policy carried out in various ministries from an SDG viewpoint. We will expand upon this perspective with an analysis of Government communications concerning European Union matters with regard to broader foreign and development policy. This analysis extends from January 2016 to August 2018. Our focus is: 1) the top level of cross-administrative foreign policy on policies which we will be examining through policies and Government communications on EU matters; and 2) the role of private sector in sustainable development, including its human rights impact. From the viewpoint of the assignment, the key Government communications concerning EU matters are related to trade policy, international taxation and migration issues, as well as development financing. Private sector policy forms the core of the analysis also in relation to the human rights based approach and LNOB. The foreign policy report (including a more detailed account of sources) can be read in its entirety in Appendix 14.

A human rights based approach⁴⁰ is a key principle of the 2030 Agenda. With regard to LNOB, the 2030 Agenda proclaims that (Article 4): "And we will endeavour to reach the furthest behind first". The Government Programme (PMO Finland 2015b, p. 34) states that Finland promotes "...sustainable development as well as international stability, peace, democracy, human rights, the rule of law and equality"⁴¹. **The human rights based approach is also the key principle of Finland's development policy.** We examine how human rights and LNOB approaches feature in Finland's inter-ministerial work regarding the private sector and sustainable development policy. The 2030 Agenda report emphasises cross-administrative cooperation in achieving global partnership (PMO, 2017a). **The society's commitment to sustainable development emphasises commitments to development funding as well as the central importance of the human rights based approach,** stating that "Finland will promote peace, equality, non-discrimination and justice both nationally and internationally" (Finnish National Commission on Sustainable Development, 2016, p. 1).

Sustainable development work will feature prominently during Finland's candidacy for membership of the Human Rights Council of the UN in 2022–2024. Finland's candidature for a seat on the UN Security Council in 2028 is linked with the 2030 Agenda. A consistent sustainable development policy is also vital to these candidacies. Although many of the Finnish policies may be considered ambitious, **a majority of the respondents to our survey (Appendices 3-4, which are available in Finnish) felt that sustainable development is addressed in foreign policy only moderately well (42%) or poorly (36%).** The Finnish Parliament's Foreign Affairs Committee (2017) felt that there was little coherence between foreign and security policy and the 2030 Agenda.

Private sector related development is a major policy priority for Finland. Many ministries participate in the implementation of foreign policy, in addition to other public actors and municipalities. The Ministry of Finance is primarily responsible for policy processes related to international taxation, whilst the Ministry for Foreign Affairs is responsible for part of the tax and development policy work and a majority of the private sector development cooperation work and trade policy. The work done by the Ministry of Economic Affairs and Employment involves both private sector development and the human rights responsibilities of business enterprises as well as the transparency and scope of their financial statements that are vital to the prevention of international tax avoidance and evasion. Finland's positions on EU legislative processes related to sustainable development and foreign policy offer a perspective

⁴⁰ In this report, the 'human rights based approach' is employed in accordance with the Ministry for Foreign Affairs policy: internationally-defined human rights are used as a basis for setting the objectives for policy and human rights principles are used as the basis for its implementation. https://um.fi/documents/35732/48132/human_rights_based_approach_in_finlands_development_cooperation_guidance

⁴¹ Consequently, this report does not address Finland's international human rights policy as such, but rather the position of the human rights/LNOB perspective in Finland's international sustainable development policy.

on, for example, trade and tax policy. Moreover, these positions offer an opportunity for a broader analysis of human rights aspects related, for example, to migration and development issues. With regard to policy themes pertaining to the private sector, essential development has been the allocation of resources to private sector actors and financial investments, particularly through Finnfund. Analysis of the section on foreign policy follows the 4Is approach (Brockhaus & Angelsen, 2012). Key findings are presented in Table 9.

Table 9. General state of sustainable foreign policy according to the 4Is framework

Institutions	Consolidation of sustainable development coordination in the Prime Minister's Office is, even by international standards, an excellent point of departure for promoting sustainable foreign policy. However, resourcing is a major problem at several levels, from development cooperation projects to ministry and administrative level personnel resources. The mainstreaming of sustainable development in foreign policy has also been too heavily concentrated in the Ministry for Foreign Affairs and its Unit for Development Policy. In addition to this, sustainable development -related tasks are often too dependent on individual civil servants. However, there are some interesting initiatives for mainstreaming sustainable development thinking underway.
Interests	The key question regarding interests is to what extent can sustainable development be promoted as a holistic agenda? The scope of the 2030 Agenda and the lack of international coordination mechanisms make this an extremely important question. The risk is that the aspects of sustainable development related to trade promotion and narrowly defined short-term "Finnish interests", are emphasised at the expense of others. The other aspects of sustainability and development are overlooked. This can also be in stark conflict with the LNOB principle. In concrete terms, the importance of improving the coordination and reconciliation between interests can be seen in, for example, differences in Government communications on EU matters among the different ministries.
Ideas	Mainstreaming the goals of sustainable development also requires that additional attention to the broader ideas guiding this work. Sustainable development features in communications on EU matters dealing with the EU's general development policy in varying degrees. There is also a need to take into account lessons that can be drawn from Finland's own development history, including the ways in which these strengths can be used more extensively in Finland's foreign policy across ministries.
Information	The production and evaluation of information supporting sustainable development needs to be improved. Mainstreaming sustainable development requires highlighting these issues in higher level alignments. On the other hand, documents issued by different ministries are often disproportionate with each other, and this problem could be addressed by strengthening the role of the Prime Minister's Office as a coordinator of inter-ministerial evaluations. Another challenge facing the promotion of sustainable development is the difficulty in obtaining information on ongoing foreign policy processes and Finnish positions. There is a need for more transparency in policy

	alignments regarding the Finnish positions in multilateral institutions. Research prospects in sustainable foreign policy should be further emphasised.
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3.3.1 Foreign policy challenges

Institutions

Consolidating coordination to the Prime Minister's Office offers a good starting point for inter-ministerial sustainable foreign policy. This work is also supported by the joint ministerial Sustainable Development Coordination Network. The culture of participation through, for example, the Development Policy Committee is an asset. In Finnish Parliament, the Committee for the Future and the Foreign Affairs Committee both play a key role. This being said, the Foreign Affairs Committee has correctly stated (2017, p. 3) that the global dimension of coherence depends on actions taken "primarily through Finland's development policy". Responsibility for the 2030 Agenda foreign policy still relies too much on the work conducted by the Department for Development Policy at the Ministry for Foreign Affairs. The Agenda's impact in other departments and ministries is much more limited, even if its importance would be emphasised in various policies.

One of the challenges repeatedly brought up in interviews is resourcing. A particularly acute issue are the recent cuts to development cooperation budget and a lack of predictability in funding. This is in stark conflict with the SDGs concerning these obligations, including SDG 17.2 and its Indicator 17.2.1. For example, the decline in basic funding given by Finland to UN organisations has had a major impact, with Finland falling behind the Nordic reference group. **Regaining the position as one of the leading countries in sustainable development demands significant additional investment.** The situation also greatly influences Finland's ability to support groups in weaker positions. Even though Finland has positioned itself as a proponent of empowering women and girls in its official policies, Finland cut 29 per cent of its support for UN Women and 43 per cent of its support for UNFPA during the period covered in this evaluation (Development Policy Committee, 2017). Furthermore, the allocation of Finland's investment to vulnerable groups in accordance with the LNOB principle would require identifying these vulnerable groups and the underlying reasons. This should be done through preliminary evaluations and analyses with an adequate resourcing at both the project and broader policy level.

One challenge is human resources, as the number of civil servants has been cut throughout the 2000s with mechanical reduction targets. For example, **the total number of personnel assigned by ministries and embassies in the Ministry for Foreign Affairs was 1,817 persons in 1998, whilst the total number had declined to 1,402 in 2017** (Ministry for Foreign Affairs, 2002, Ministry for Foreign Affairs, 2017). The interviews also revealed an oft-repeated concern that experts are unable to participate in many important international meetings, in which Finland would be able to make a genuine contribution. **Supporting an international system based on regulatory control requires an adequately resourced civil service.** Personnel turnover in the Ministry for Foreign Affairs can also cause problems, as many tasks are handled by career diplomats. A positive aspect of this is the exchange of ideas. On the other hand, there is a danger of deterioration of institutional memory, when knowledge of various negotiation processes and networks is lost. The problem is further exacerbated when demanding tasks have to be outsourced to short-term interns.

Interests

The 2030 Agenda is an enormous endeavour. According to the interviews, Finland lacks a shared understanding of how the 2030 Agenda influences policy. **Is the promotion of sustainable development related only to specific activities in the private sector -related development, or is there a genuine effort to promote sustainable development globally?** The promotion of many important sustainable development -related themes are dependent on individual civil servants. Different policies often state that “Finland promotes” or “Finland does” certain things, but the administrative challenges related to these and the ways to overcome them are not given enough attention. For example, the Global Sustainable Development Report (GSDR) mentions human rights as a common denominator. But, to what extent is the objective shared in real terms?

In development policy, thematic areas vary widely from one minister and government to another. For example, conflicts between commercial and sustainable development interests were mentioned in interviews and in the stakeholder event working group as a concern. In practice, commercial interests would seem to take precedence over other objectives, for example in relation to the arms trade policies. This was a concern even though Finland is committed to the EU's arms export criteria, which gives particular attention to human rights, as well as to the protection of regional peace, security and stability. The same problems were relevant in corporate responsibility policy and in Finland's Arctic policy, where commercial and sustainable development goals are not always aligned with each other.

There is a risk that the commercial pillar of sustainable development, and narrowly defined short-term “Finnish interests”, are emphasised at the expense of other goals. The other aspects of sustainability and development of developing countries are overlooked. This may be in stark conflict with the LNOB principle, according to which sustainable development should be focused on supporting vulnerable groups. The problem is related to a concern that interviewees expressed over “cherry-picking” individual goals from the extensive 2030 Agenda in ways that may not promote the agenda as a whole.

The nature of the problem is evident in the private sector -related foreign policy. As corporations internationalise, corporate responsibility issues have gained increasing attention also in Finland – it is not always possible to expect the Government to assume its responsibility for the enforcement of laws. The National Action Plan for the implementation of the UN Guiding Principles on Business and Human Rights⁴² was drafted during the previous Government's term. According to the interviewees, the sustainable development agenda has risen to become an integral part of corporate responsibility. Business enterprises have adopted the sustainable development agenda, which offers a new way to discuss difficult issues. **The flip side of this positive development is the concern of interviewees that the sustainable development discourse and “doing good” would supplant the political discussion on business enterprise obligations concerning human rights and the right to work, the potential adverse impacts of business enterprise activity, and their legal obligations.** There is a risk that sustainable development facilitates cherry-picking: actors are profiled by means of individual goals, thus overlooking the LNOB principle and human rights based approach.

⁴² In accordance with UN principles, the concept of “human rights” includes the core conventions laid out in the ILO Declaration on Fundamental Principles and Rights at Work. https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf

There has been a shift in development financing toward private sector instruments.⁴³ Officially, states are still expected fulfil their own obligations in the drafting and enforcement of legislation, and business enterprises are expected to do their part in accordance with the regulations and principles that apply to them. Conversely, the interviews revealed that a strong belief in having the private sector play a primary role in development policy – i.e., assuming that development is realised directly through investments and the jobs they create – has led to a situation in which information on publicly funded development cooperation is increasingly being treated as a business secret. There has also been discussion about project administration and developmental impact criteria expected of private sector projects. The requirements for conventional development cooperation project administration are considered too stringent for private sector actors, which can be problematic, as publicly funded corporate activity should be expected to ensure a high degree of transparency. However, according to the **UN Guiding Principles on Business and Human Rights, the state is directly responsible for the impacts that business enterprise activity has on human rights**. Indeed, the Ministry for Foreign Affairs launched a project in 2018 whose purpose was to develop the human rights expertise of civil servants using private sector development instruments. In particular, **the evaluation of human rights and inequality impacts from an LNOB point of view remains ineffectual**, as the funding of, for example, green technology business projects is considered a legitimate way to promote sustainable development. However, as the experiences of Finnish SMEs participating in the Business with Impact (BEAM) global development innovation programme revealed in a survey commissioned by the Finnish Committee for UNICEF in 2017, business enterprises do not always understand the difference between their operational performance and its impact on development, with environmentally-friendly products considered as having inherent developmental impacts. According to the same survey, combining profitable business with development goals, such as reducing poverty, is challenging.

A key area of focus with regard to private sector development impacts would be to strengthen the fundamental principles and rights at work at the global level through the International Labour Organization (ILO). The ILO, however, is not given priority on the list of UN organisations where Finnish development policy is concerned, and cooperation with it is coordinated by the Ministry of Economic Affairs and Employment. The potential use of the ILO in promoting sustainable development based on human rights would require more effective coordination as well as inter-ministerial cooperation and resourcing and better prioritisation of the ILO.

Interests in light of Government communications concerning European Union matters and other policies

The E and U Government communications concerning European Union matters provide interesting research material for assessing how well sustainable development has been mainstreamed to foreign policy. E communications are sent straight from ministries to the Parliament, whereas U communications are discussed also in the Government's plenary session. Even though responsibility for the preparation of communications typically belongs to an individual ministry, ministries may comment on communications being prepared by other ministries⁴⁴. According to the Government strategy on ways to influence the EU (2017, p. 16), Finland endeavours to “proactively and actively promote its goals in the European Union.”

⁴³ Although private sector instruments account for only a few per cent of the development cooperation budget, this is due to the fact that the biggest changes in focus have occurred in financial investments outside the budget framework.

⁴⁴ A comprehensive analysis (with cited sources) of E and U communications can be found in the foreign policy section in a more extensive appendix.

The primary focus in this work has been in “responding to migration; promoting growth, sustainable development and stability; developing internal security; and strengthening the external dimension and security of the EU” (Finnish Government 2018a, p. 14). The political mandate for promoting sustainable development is therefore strong. The review of these communications on relevant themes offers an opportunity to examine whether ministries differ from one another where the mainstreaming of SDGs is concerned.

Communications concerning migration issues differ depending on the ministry responsible. Ministry of the Interior positions explicitly emphasise migration as a problem for Finland and the EU alike, which needs to be controlled or prevented. No sustainable development perspectives are mentioned. For example, in an E communication from the Prime Minister's Office and Ministry of the Interior concerning migration (E103), the focus is given to reducing costs incurred by Finland by managing migration outside Finland's borders in an effort to save on costs. On the other hand, a strong trend away from the instrumentalisation of development policy and toward the management of migration is visible in the positions drafted by the Ministry for Foreign Affairs, including even the Department for Development Policy.

In E and U communications concerning international taxation, Finland has traditionally followed the EU Commission's positions, which can be considered as moderate. Communications on international taxation have been prepared by the Ministry of Finance, with the exception of one communication prepared by the Ministry of Justice and another by the Ministry of Economic Affairs and Employment. **None of these communications on international taxation makes any reference whatsoever to the 2030 Agenda or the SDGs.** In the Ministry of Finance, the work related to international taxation is conducted with minimal resources, even though its responsibilities have markedly increased in the 2010s. The taxation and development -related work at the Ministry for Foreign Affairs has been so poorly resourced, that increasing its advisory role in tax and development -related work in other ministries has been an unrealistic idea.

Based on our interviews, Finland is planning to emphasize development banks in its tax and development work. In practice, this can be associated with, for example, the funding rounds of the World Bank and African Development Bank. Tax and development related policy alignments are too vague, and Finland needs to articulate its own advocacy goals more clearly (Development Policy Committee, 2017). The matter should have a higher profile also in Parliament, particularly in the Foreign Affairs Committee.

In addition to international taxation, there were several EU communications related to trade policy. This is an interesting field, not least because the 2017 Government Annual Report mentioned that sustainable development has been promoted in trade agreements (Finnish Government, 2018a). Many communications, however, merely express content that agreements pave the way for trade or offer Finland new export opportunities. **The 2030 Agenda was most prominently featured in communications from the Ministry for Foreign Affairs Department for Development Policy.** For example, a briefing on the relations in the African, Caribbean and Pacific Region stated that future EU cooperation should coherently promote “UN Sustainable Development Goals as part of the EU's global influence targets and strategies”. In addition to this, the communication called for a focus on the least developed and vulnerable states. Finland also demanded a strong commitment to the International Criminal Court (ICC) and cooperation in migration matters. However, neither SDGs nor even their themes appeared in any of the communications. Furthermore, health care and social services issues received little attention.

Ideas

In this section, we will expand the examination of sustainable development policy to communications addressing sustainable development and foreign policy on a more general level. The main focus is on how the ideas behind the SDGs are conveyed into policy. The sustainable development agenda brings actors together at the global and national level, from different administrative branches and social sectors. Despite this, the clarity of the concept and, in particular, its concrete political impact was called into question in interviews. A coherent sustainable development policy requires a policy in line with the global 2030 Agenda, which is not possible if the primary focus is placed on individual SDGs. The LNOB principle and the connections to human rights are key examples. Civil servants working directly with human rights and inequality issues see human rights as an integral part of the sustainable development agenda. However, the human rights perspective is not part of the mainstream in broader ministerial work.

On the other hand, with specific regard to international human rights policy, Finland has engaged in cooperation with other actors, particularly the Nordic countries, to ensure the human rights-based approach in sustainable development and link the 2030 Agenda to international human rights conventions and norms. This stems from the concern that, by focusing on individual goals, the principle of non-discrimination in the 2030 Agenda will be overlooked, with no attention given to the most vulnerable groups. Based on the interviews, it seems that **the connection of human rights with SDGs perceived as environmental issues is not always taken into consideration – not even in Finland**. Sustainable development dimensions have been mainstreamed, for example, in the structure of comment rounds primarily in the Ministry for Foreign Affairs.

SDGs have appeared to a modest extent in EU positions concerning Finnish development policy after 2015. Top level Government objectives and thematic communications are bridged by the strategies for influencing the EU in 2017 and 2018, which are published as E communications. The 2017 strategy for influencing the EU states that:

"Implementation of the 2030 Agenda and sustainable development principles as well as migration management require a reform of EU development policy. Finland places particular emphasis on increasing climate sustainability and renewable energy, strengthening the public economy in developing countries, including the capacity to collect taxes, green and participatory growth, strengthening the private sector and women's role, reducing youth unemployment, enhancing the rights of women and girls, mitigating illegal money flows, and taking migration issues and a new cooperative model based on a partnership framework."
(Finnish Government 2016, p. 26)

In other words, there is a long list of themes essential to both the 2030 Agenda and Finland's development policy report. These are, however, limited to the steering of development policy. It is also unclear as to **what concrete measures should be taken to change the EU's development and development cooperation policy**, so that these initiatives can be progressed. Moreover, as stated above, SDGs do not generally appear in communications on, for example, international taxation. This problem is linked to the fact that **Finland lacks clearly defined written and open advocacy goals in its work related to international organisations**.

The above-mentioned communications were prepared at either the Government level (influence strategies) or jointly by the Ministry for Foreign Affairs and the Ministry of Economic Affairs and Employment. Relevant EU positions are also outlined in communications prepared by the Ministry for Foreign Affairs. The sustainable development perspective is more evident in these than the documents mentioned above. Conversely, the E communication "Harnessing globalisation by 2025" published in 2017 makes no mention whatsoever of the 2030 Agenda, nor does it address human rights or inequality issues, even though sustainable development is prominently featured in the communication itself.

Despite the fact that SDGs encompass all policy sectors, development cooperation remains a key instrument for promoting sustainable development at the global level. We assessed private sector development cooperation also through related project proposals and reports. In practice, projects were selected by looking at funding decisions on the Ministry's open website and then ordering project documents concerning projects considered to be of interest with regard to this report⁴⁵. **Of the ten project plans examined, four made direct mention of SDGs.** On the other hand, all the plans noted links between the projects and Finland's development policy priorities. In this context, the level of the human rights consideration was addressed in only six of the projects, as required by the Ministry's Human Rights Based Approach in Development Cooperation, Guidance note, 2015. In addition to this, two of the plans also contained analyses of the human rights based approach. The analyses were, in many cases, quite superficial mentions, and the plans did not explain what the evaluations were based on.

In summary, it can be said that the taking of SDGs into consideration varied a great deal. An interesting question to ask is to what extent should plans at the project level be directly linked to the 2030 Agenda framework. Or is it enough that Finland's more general development policy takes the 2030 Agenda into consideration? There are no clear-cut answers to these questions.

Information

Sustainable foreign policy requires the production of various kinds of information. To what extent is Finland's sustainable foreign policy in all administrative branches based on researched information? Are there problem areas in the availability or dissemination of information? **The collection, availability and use of information categorised by factors affecting vulnerability (e.g. gender, socioeconomic class, ethnic background) is of utmost importance in the promotion of the human rights based approach and LNOB.** The production of detailed information has also seen vital in the international discussions in promoting the human rights based approach in sustainable development (e.g. OHCHR, Danish Institute for Human Rights, 2018). Another challenge facing the promotion of sustainable development is the difficulty in obtaining information on ongoing foreign policy processes and Finnish positions. According to interviews, not even those following the topic professionally have an easy time obtaining information on ongoing processes. There are also major challenges in the evaluation of activities and using the information produced in evaluations for decision making.

One of the challenges mentioned in interviews and workshops was the funding of small NGOs that work with development cooperation and development policy. The field of NGO funding has changed quickly in recent years with reductions in funding possibilities for communications and global education. In the 2018 call for funding applications, funding was

⁴⁵ A more detailed list of the projects examined can be found in foreign policy Appendix 14.

granted to 15 projects as compared to 19 projects in 2017 and 45 in 2016 (Rekola, 2018). In addition to this, attitudes toward organisations active in influence work have often been critical, even though the debates they started have resulted in improvements to sustainable development work.

3.3.2 Foreign policy opportunities

Institutions

Achieving a common understanding of the link between sustainable development and foreign policy is a long process. Political will is needed to increase the official development aid budget and ensure adequate resourcing across ministries. Likewise, various issues within ministries also call for attention. This section deals with some of the tools that can be used to achieve these goals. Even though the boundaries between ministries can sometimes hinder inter-ministerial cooperation, the interviewees still saw that this cooperation works better in Finland than in many other countries.

The 2030 Agenda can facilitate overcoming boundaries between foreign and national policies. Interviewees mentioned cases where the participation in the UN High-Level Political Forum (HLPF) "awoke" high-level civil servants to the links between the global dimension and development policy within their respective administrative branches. This, in turn, resulted in progress with the broader agenda. On the other hand, there is a risk that, instead of deeper institutionalisation, **good practices will be forgotten because of the high personnel turnover.**

The Foreign Affairs Committee states (2016, p. 3) that "Even if there would be savings in development funding for the framework period, the long-term goal stated in the Government Programme is to increase development funding to 0.7 per cent of the GNP, in accordance with the UN and EU targets." In 2018, the Ministry for Foreign Affairs prepared a scenario, in which the UN target could be achieved by 2028 (Ministry for Foreign Affairs, 2018a).

In addition to the level of development funding, the problems with human resources in ministries and embassies described in the previous section have to be addressed. A well-functioning civil service is not only a prerequisite for democracy, but also a way to maintain and even raise Finland's foreign policy profile. For example, the declaration made by the Finnish Parliament's Committee for the Future (2017, p. 4), i.e. "the leadership and activity of Finland and also the EU" will not be realised without adequate resources. **At present, Finland's resources and profile in developing countries and international fora fall below those of key reference countries. At the same time, many emerging economies have become more active in various fronts.** The current inadequate resourcing will have an adverse impact on Finnish society as a whole, with missed opportunities for various new contacts in international fora. Additional resources would provide opportunities to increase Finland's presence internationally. Finland has linked, for example, its chairmanship on the Arctic Council (2017-2019) and in negotiations for the UN Arms Trade Treaty (ATT) with the 2030 Agenda.

The ministry-specific evaluations of the future prospects in their ministerial agendas offer an opportunity to mainstream sustainable development across administrative boundaries. Drafted every four years, these evaluations were last published in 2018. The evaluation for the Ministry of Finance includes a somewhat extensive review of forces driving change in world politics, but the procedural sections do not discuss, for example, the importance of international tax cooperation as a means of tackling global challenges, even when the topic

falls within the purview of the ministry (Ministry of Finance, 2018a). The 2018 evaluation of the Ministry of Economic Affairs and Employment also ignores the foreign policy dimension of the ministry's administrative branch, with the exception of climate policy (the Ministry of Economic Affairs and Employment, 2018). On the other hand, the Ministry of Economic Affairs and Employment includes sustainable development in its strategy document, "Agenda for sustainable growth". The ministry also aims at promoting sustainable development during Finland's EU Presidency. Several other government agencies that promote internationalisation of business (VTT, Business Finland, Finnvera, Tesi, GTK – see section 3.2.3 for more detailed information) have included sustainable development in their strategies.

In its own evaluation, the Prime Minister's Office considered the ministry-level evaluations as a whole. "The overall coordination and forming an overview of Government work as a whole would promote a long-term, common content framework that unites the Government and within which it would be possible to include various preparations" (PMO Finland 2018a, p. 16). The 2030 Agenda was brought up as the answer to this challenge.

In the Ministry for Foreign Affairs, sustainable development (particularly climate and environmental sustainability) are included in the ministry strategy as well as the financial and operating plan drafted by the Management Group. According to civil servants, this has made it possible to take the 2030 Agenda broadly into account, as the goals are also integrated into results frameworks. However, ownership of the agenda is still primarily with the Department for Development Policy. An even more concrete impact is perhaps the Development Cooperation Results Report, which is related to sustainable development work and was published in the autumn of 2018. The report provides an interesting perspective on the grouping of SDGs (Ministry for Foreign Affairs, 2018b). Drafting of the report was part of a broader operational reform at the Ministry for Foreign Affairs which emphasised thematic thinking. At the turn of the year in 2019, the Ministry for Foreign Affairs began forming a group that brought different units and departments together to focus on SDGs. This could be used as an example of a good practice for other ministries. **In ministries, it is important that sustainable development work is not outsourced to private experts specialising in such work** (see also section 3.2.2): all sector experts must possess adequate expertise and resources for taking the 2030 Agenda into consideration in their own work. More effectively tying budget systems to the logic of SDGs would also be beneficial.

Interests

A key question related to the mainstreaming of sustainable development in foreign policy is how well countries can solve conflicts of interest between sustainable development and other policy goals. **Mirrored against Finland's own development history and areas of expertise, it is striking how little Finnish EU policy positions emphasise themes related to the social services and the health sector.** With the exception of a communication on the TTIP relating to social services and health care, the *only* mention of sustainable development is found in a communication concerning Africa, Caribbean and Pacific Region trade negotiations.

The situation is not much better in general communications on EU development policy, which briefly refer to reproductive health, but no other areas of social policy. In other cases, social policy is only mentioned in passing among numerous other policy segments. The lack of attention given to social services and health care could be due to a variety of reasons, one of which might be personnel reductions in this particular field when the Ministry for Foreign Affairs discontinued the post of social policy adviser. Another sector commonly associated with the Finnish development model – education – gets slightly more attention in the

communications than social services and health care, but the mentions are still rather sporadic.

What is needed is a more comprehensive understanding of how sustainable development goals are linked to each other and which iteration will be advocated by Finland. It cannot be assumed that each ministry can remain focused on a few individual sectors, whilst “someone else” would address the rest. **Internationally, Finland must also assume responsibility for the 2030 Agenda as a whole.** From an LNOB standpoint, a crucial issue is that development cooperation funds are not used to hinder the mobility of the most vulnerable people. Instead, these funds should be put toward resolving the problems in the countries of origin and reducing inequalities in global mobility.

In tax and development work, Finland aims to continue focus particularly on large development banks, and to maintain the centrality of tax-related issues for example during the funding rounds of these development banks. In this context, it would be important to, for example, address the ways in which the World Bank's influential report, *Doing Business*, can be seen to promote harmful tax competition. The report's ease of doing business index is often used in politics and business (Kelley & Simmons, 2016).

In trade policy, some communications underlined the need to include more comprehensively sustainable development approaches in trade agreements. Supporting the multilateral trade policy system and the UN Conference on Trade and Development (UNCTAD) is an essential part of this goal. **The policy goals that Finland aims to advocate in trade policy should be articulated more clearly, including what concrete measures will be taken and in which forums.** For example, there is still much left to be said about maintaining the profile of development policy targets in EU trade policy, as mentioned in the Government Report on Development Policy (Foreign Affairs Committee, 2016).

Ideas

Investment-driven private sector development has also become an international megatrend as part of the 2030 Agenda, with Finland also joining in. In the midst of rapid changes, there has not been enough active debate on the most comprehensive development model that can be promoted through this work. **An important question to ask would be which pre-conditions should be met in order to facilitate development in developing countries.** The focal point of Finland's development policy has changed in recent years to supporting foreign investments in developing countries. One might ask to what extent a small country such as Finland differs from other OECD countries doing the same work.

There would be room to expand work related to developing trade capacity, taxation, addressing the human rights impacts of business, promoting extensive social policy and education policy, and so on. The cross-sectoral foreign policy in these sectors could draw from Finland's traditional strengths in a situation where the international development field is getting increasingly crowded. On the other hand, **concrete ideas on what kinds of policies Finland should advocate in development banks with regard to taxation and financial investments are needed.** With the current restrictions in place, financial investments might be channelled through countries which, according to some definitions, could be referred to as “tax havens”. Partly in order to address these kinds of challenges, the Development Policy Committee (2017) has proposed issuing a governmental **plan for influencing multilateral cooperation**. It would help to clarify and integrate Finland's cross-administrative work in the OECD, World Bank, EU and other important international organisations. In addition,

combining the development policy report and foreign and security policy report would be a major step.

Private sector interest in sustainable development should be harnessed in such a way that it would promote responsible business, which takes the importance of the 2030 Agenda into consideration. This should also include the corporate responsibility to respect human rights (including labour rights – "avoiding harm", not just "doing good"), which should be taken into account in sustainable development pledges made by business enterprises. In recent years, great strides have been made with respect to this in private sector development instruments, but there is still much work to be done. Conversely, the role that the private sector plays in, for example, promoting labour rights, is limited, and Finland should indeed support strengthening the regulation of labour rights at the global level through the ILO.

Information

Development policy and foreign policy are often seen as separate areas in Government policies. Development policy should be part of foreign policy, but the evaluation of sustainable development emphasises development policy. We lack a comprehensive cross-administrative evaluation system. **Integrating development and foreign policy agendas would also help with the "policy glut", in which the growing number of policies cannibalises their effectiveness.** Efforts should also be made to both reduce the number of policies and more effectively take sustainable development into consideration in them throughout the Government. In recent years, there has been a great deal of discussion on "harmful subsidies", and this same approach could be used when dealing with sustainable development issues. What adverse development impacts might there be in development countries as a result of, for example, decisions on arm exports? And correspondingly: What positive multiplier effects could these decisions have? This kind of reasoning would increase understanding of the interdependencies of goals, but also require increased coordination and training.

We should also consider **how the profile of research could be raised in Government's EU-related alignments.** For example, communications related to corporate taxation make references to evaluations on the impact that reforms have on tax revenue, but no sources are given. Better, more prominently featured links to empirical and legal research data would help to enhance the connections between civil servant work and research over the long term. Furthermore, the impacts of development should be comprehensively monitored, also using external *ex post* evaluations, for which adequate resources must be provided to ensure their proper implementation.

The inclusion of foreign policy and trade policy was considered crucial when evaluating progress of the 2030 Agenda. The evaluation experts in ministries have intensified their inter-ministerial cooperation through an informal network that was formed in 2018, which providing an excellent starting point for further improving cross-sectoral evaluations. However, improving the impact that evaluations have on decision making would require greater attention. Existing cross-administrative sustainable development coordination bodies could serve as one such channel. The cross-administrative profile of sustainable development in evaluation could be enhanced by, for example, having the Prime Minister's Office also participate in this coordination work. In addition to this, the need to enhance expertise in development policy on the Expert Panel on Sustainable Development was also stated.

In development policy, more attention should also be given to assessing the performance and cost-effectiveness of small organisations in relation to large organisations, including advocacy work. **Small organisations often follow cross-administrative themes on sustainable development and identify their shortcomings. This watchdog role is crucial to ensuring informed public discourse.** It also supports the continuous, agile evaluation of activities and their establishment in ways that internal Government evaluation practices and implementation approaches cannot.

Ministry annual reports should be developed so that they provide a genuine evaluation of sustainable development work and its impact. Current annual reports were seen as too focused on listing the work that has been done rather than genuinely assessing it. There is also a need for training in, for example, how to concretely promote the human rights based approach. This training should be provided by experts within the ministries. Links between the work in different ministries should also be identified more thoroughly and best practices should be shared between ministries. One of the problems with this is that, for example, different experts are used in different UN processes, which means that the focal points also vary.

4. INTERPRETATION OF RESULTS AND CONCLUSIONS

This section presents the primary results of the PATH2030 evaluation and the conclusions drawn from them, with a particular focus on key observations and areas needing improvement.

4.1. The state of sustainable development and policy impact

Even though Finland is doing well in sustainable development by international standards, there is still much work to be done in order to achieve the goals laid out in the 2030 Agenda. According to indicators, the challenges of sustainable development particularly involve consumption, the state of nature and the environment, climate change and inequality.

A major challenge in policy development is primarily the fact that the sustainable development policy **theory of change is unclear**: the targets are broadly defined and abstract, and existing measures do not provide a credible path to achieving the goals.

However, sustainable development is a **widely shared and accepted objective** in, for example, ministries. Outlining sustainability according to the 2030 Agenda goals is widely accepted. The focus areas specified in the 2030 Agenda report (PMO Finland 2017a)⁴⁶ reflect the challenges facing sustainable development and should be maintained also in the future. Likewise, key policy principles⁴⁷ address factors that are essential in light of this evaluation and should be preserved.

In light of the data obtained from this evaluation, Finland's sustainable development policy has managed to establish participation and ownership and, during the period under review, important steps in the mainstreaming of sustainable development were taken in, for example, ministry functions. However, **there is still much work to be done in the transformational potential, long-term action and coherence of policy**.

In this evaluation, Finland's sustainable development policy could not be linked to specific economic, social or environmental impacts. This can be explained particularly by the nature of sustainable development policy: the **added value of** sustainable development policy has been in the creation of a broad-based vision and common language, the development of mechanisms for influencing policy as a whole, and the establishment of platforms for monitoring and discussion.

The added value of sustainable development could, however, be **gearing all policy more towards international SDGs**, which would require, for example: reifying, collecting and bringing goals to the core of the policy; creating a credible path for change; improving monitoring; and the frequent scientific evaluation of goal achievement.

⁴⁶ 1) A carbon-neutral and resource-wise Finland; 2) A non-discriminating, equal and competent Finland

⁴⁷ A - Long-term action and transformation; B - Policy coherence and global partnership; C - Ownership and participation.

4.2. Sustainable development policy instruments

With regard to the **structural challenges** of sustainable development policy, it was found that the existing institutional structure is incapable of keeping key sustainable development challenges consistently on major policy fora. Although there is a wealth of **information** on how to tackle the challenges of sustainable development, this information is not necessarily **usable by decision-makers** at the right time and in the right form. There are also **significant conflicts of interest** in many issues that are important from a sustainable development standpoint. This means that both scientific knowledge and policy mandates are needed to effect change. However, because sustainable development is ideally a widely accepted goal, it creates a common language for finding solutions.

According to this evaluation, there would seem to be a major need to make changes in sustainable development policy instruments related to the **conveying and use of information in policy**. Firstly, a system of multiple sustainable development indicators classified in different ways causes confusion. In addition to this, the credibility of national indicators is compromised by the fact that they are not independently produced with the wide support of the scientific community, but rather by representatives from ministries and some state-run research institutes. The Expert Panel on Sustainable Development, which represents the scientific community, has been almost entirely overlooked and unable to exert adequate influence in key policy processes.

The evaluation strongly supports the fact that the 2030 Agenda Coordination Secretariat is kept within the Prime Minister's Office as well as that the Inter-Ministerial Coordination Network will continue its activities. The National Commission on Sustainable Development has maintained its influence as a meeting point for the Prime Minister or Minister of the Environment, top level ministry personnel and **civil society**. According to the evaluation, the Commission could be used more strategically in promoting sustainable development. Likewise, the Commitment 2050 tool has potential for significantly increasing influence. Stronger state support would be needed for sustainable development work in cities.

One result of the evaluation is that the existing sustainable development policy instruments should be preserved, developed and enhanced. However, a long-term goal in particular should be that **sustainable development policy in the form of a policy segment or separate policy should become obsolete**, and striving for sustainability should be more extensively integrated in the function of all policy segments. At present, however, there is still much work to be done in the development of sustainability targets and paths for change as well as operating approaches that are suitable for them.

4.3. Foreign policy of all administrative branches

Finland has a long-standing tradition as a proponent of broad-based foreign and development policy that stems from its strengths as a nation. These strengths can also be put to use in the future. In order to enhance Finland's global role, attention must be given to the fundamentals: **Finland needs a credible plan and broad-based commitment to increase development cooperation appropriations to 0.7 per cent of the GNP**. A strong political commitment to the Nordic cooperation model should also be emphasised. The model includes strong support for a rules-based system, which should also, in practice, be seen as **strong support for UN organisations and high-profile work within the UN**. Strong, concrete cross-administrative support for a human rights based approach is also important.

Opportunities to promote the sustainable development work of all administrative branches in foreign policy are exceptionally good in Finland, as coordination work in this area is concentrated in the Prime Minister's Office and because Finland is already highly committed, by international standards, to the global development agenda. In practice, however, interviews and text materials reveal that the mainstreaming of the human rights based approach and broad-based foreign policy in sustainable development, both within the Ministry for Foreign Affairs and throughout the Finnish Government, still needs a great deal of work and the resources required to carry out this work.

4.4. Need for systemic changes

The need for a systematic rethinking of work and the economy was surfaced at different points of the evaluation; in a survey, interviews and workshops. In the survey, this theme was addressed with the question: On what should Finland focus in order to achieve the goals of sustainable development? Reform of the work and economic policies received 37 per cent of the respondents' votes, and in free-form responses it was described as being a **decisive change for a more sustainable future and a requirement for achieving other goals**. Some of the respondents stated that one of the biggest challenges to the coherence of SDGs were the conflicts between economic and employment goals and many of the other goals. Even though long-term sustainability goals are unanimously accepted, short term economic and employment policies often take precedence over them. Ministry experts felt that expansive themes such as the reform of work and economic policies were challenging. Such themes are, however, necessary from a sustainable development standpoint. Some of the respondents declared the importance of doing away with the present economic model of continuous growth, whilst others felt it was a requirement for all activity.

At the end of the project, two round table discussions were held on this theme. The round table participants were researchers, politicians, civil servants and representatives of companies and NGOs. The participants considered it important that an open social discussion could be held on the theme. The discussion touched on such topics as the need for **new macroeconomic models**, sustainable well-being indicators parallel to the GDP, and **comprehensive reform of social security** so that it takes forms of work other than paid employment into consideration. One approach to the sustainable economy is the "Doughnut Model" (Box 2).

Box 2. Assessing Finnish performance through the Doughnut Model?

The "Doughnut Model" provides an alternative way of looking at a compartmentalised analysis of the economy, environment and human well-being. The Doughnut Model is based on Kate Raworth's critique of 20th century economics (2017). In the model, she questions the ability of the mechanical balance of supply and demand and economic growth to solve environmental problems and bridge the gap in income levels.

The Doughnut Model is illustrated by a diagram, which consists of two rings: one showing the social foundation, and the other the planetary boundaries that represent the ecological ceiling. Between the rings of social foundation and ecological ceiling is space for a safe and just society. The inner ring describes the opportunities for living a good life. If the inner ring is filled, the basic requirements for human well-being have been met. However, achieving the goals of the inner ring still does not say anything about well-being in a welfare state.

The outer ring of the doughnut describes the limits of the planet's critical natural threshold, e.g. carbon dioxide emissions, nitrogen and phosphorus loading, materials and the ecological footprint. In today's world, humanity overshoots the critical natural threshold, at least where nitrogen, phosphorus, biodiversity and climate change are concerned.

Using Raworth's Doughnut Model, researchers at the University of Leeds analysed the state of sustainability in different countries with various indicators to describe the carrying capacity of the planet and human well-being (O'Neill et al. 2018). According to their findings, no country stays within the critical natural threshold whilst achieving the goals of social well-being at the same time. Finland overshoots the critical natural threshold in several areas, but achieves social goals, with the exception of employment (Figure 8).

One might consider whether there is a need to present sustainable development indicators by new means, such as the Doughnut Model, thus illustrating the interaction between ecological and social development more clearly. However, this approach requires the definition of sustainable development target levels.

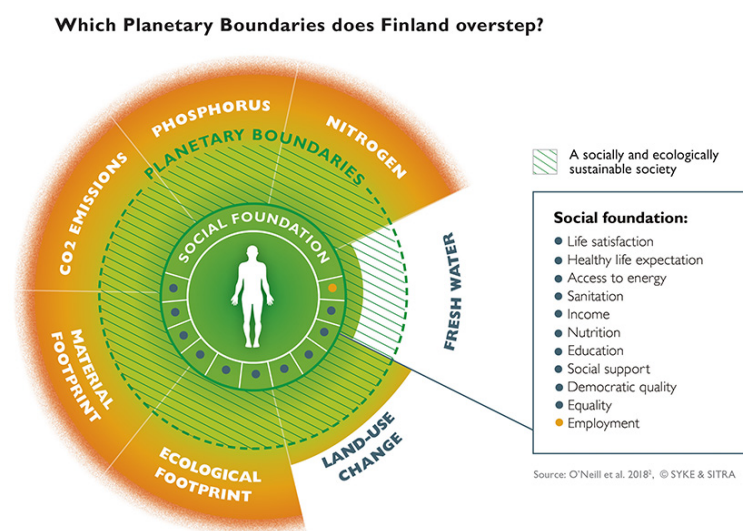


Figure 1. The Finnish state described through the Doughnut Model (Furman et. al. 2018, O'Neill et. al. 2018)

4.5. Reflections on the setting and strengths of the evaluation

Based on the process, it can be stated that the **strengths of the PATH2030 evaluation setting were:**

- A strong emphasis on policy development and in the creation of comprehensive and viable procedural recommendations
- A broad participatory evaluation process that combined various approaches and produced rich content with multiple perspectives
- The desire for a comprehensive understanding of the key challenges and development opportunities of sustainable development policy
- The desire to focus on issues central to the achievement of sustainability targets.

The limitations of the evaluation setting were:

- The tight schedule for conducting the evaluation in relation to the scope of the task
- Emphasising the perspectives of ministry representatives and key experts at the expense of, for example, municipal or business perspectives
- Level of information on key content issues (e.g. energy system changes, sustainable forest use and the promotion of equality), related policy development needs and the adequacy of existing measures
- Cost-effectiveness was not assessed in this work
- Due to the nature of the evaluation, attention was focused more on challenges than strengths.

As is often the case when conducting evaluations, evaluation questions are agreed upon together by the commissioning party and the author at the beginning of work. In this evaluation, it was not possible to do so due to VN-TEAS project rules. This presented challenges, when the project group was forced to redefine the evaluation questions in the middle of the project.

The **analysis of content issues** important to the achievement of sustainability targets proved to raise the most criticism. This kind of analysis of sustainable development challenges that was brought about by, for example, indicators and expert statements, will be needed also in the future. However, an analysis of positive opportunities and places for positive global handprints should also be given greater attention in the future along with challenging content issues.

A positive aspect of the evaluation work was that so many people gave their time to the project meetings, workshops, interviews and surveys. Sustainable development speaks to a wide variety of different actors. The timeframe for completion of the project, however, made the work difficult: When such an extensive evaluation had to be conducted in less than six months--and the project included numerous interactive events, meetings and interviews--there was less time for work planning, background work and more in-depth analysis than would have otherwise been necessary.

5. RECOMMENDATIONS

Achievement of the 2030 Agenda goals offers an opportunity to reform society as a whole toward meeting future needs. The goal is an ambitious one and has a clearly defined timeline. The next three full Government terms form a goal-oriented continuum, at the end of which the 2030 Agenda goals will have been realised in 2030. Now there is an opportunity to find ways for political parties and the next three Governments to commit to SDGs that extend beyond just a single Government term.

The following recommendations have been divided into four topics. The reference given at the end of each recommendation refers to the section of the report where the recommendation primarily applies.

The state of sustainable development and policy impact

- 1. Future Governments should have the achievement of the 2030 Agenda goals as the basis for their Government Programmes.**
 - Each Government's objectives should be in line with the principles of sustainable development.
 - Finland's focus areas in sustainable development work, i.e. 1) A carbon-neutral and resource-wise Finland and 2) A non-discriminating, equal and competent Finland, are on point and work should be continued based on these. (See section 3.3.2.)
 - The focus of political leadership should be in sustainable development areas where Finland still has a great deal of work to do in achieving goals, or special opportunities to serve as a global leader. The focus areas should therefore include at least in the promotion of carbon-neutrality and resource-wisdom as well as the reduction of the total global impact of consumption and inequality. (See section 3.1.1. and Appendix 2, which is available in Finnish)
 - All ministries should more extensively integrate the 2030 Agenda in their own strategy, operations, indicators and futures reviews as well as those of units in a performance agreement with them. (See section 3.2.2. and Appendices 8 and 9, which are available in Finnish)
- 2. The Government should launch a process in which a national roadmap extending to 2030 is produced in order to strengthen the goal-oriented and systematic nature of policy with regard to sustainable development. The roadmap should allow Finland to take a leadership role in moving toward a global economic system that takes limits on the carrying capacity of nature into consideration.**
 - Draft a roadmap extending to 2030. The roadmap can be drafted, for example, at the request of the Government, using the parliamentary process and Expert Panel on Sustainable Development for support. The roadmap shows how Finland should achieve all the 2030 Agenda goals by 2030 and supports the achievement of goals in the EU and globally. The roadmap focuses on phenomena with special challenges to or opportunities for sustainable development. (See section 3.1.)

- As part of the roadmap, measurable national target levels for various SDGs should be compiled and defined based on the best available scientific data and a broad participatory process. (See section 3.1.1.) The goals should be categorised according to the 17 SDGs. The eight national goals should be dispensed.
- Achieving these goals involves systemic change in many different fields. Such major changes must be made with careful consideration, and they require long term political commitment. System-level changes are, however, possible, provided that there is political commitment to solutions which promote change that is fair to all parties. (See section 4.4. and box 2)

3. The Government should allocate public funds for sustainable development with greater coherence and impact.

- The sustainability review of the state budget should be extended and expanded so that it would also cover the focus area "A non-discriminating, equal and competent Finland".⁴⁸ (See section 3.3.2.)
- Goals, such as the gradual elimination of subsidies that have an adverse impact on the environment and increasing investments that promote sustainable development, should be set for the sustainability of the budget. The budget should be formulated in such a way that state economy funds allocated for dealing with phenomena important to sustainable development can be analysed as a whole. The impact of appropriations on the achievement of goals should be monitored and assessed in the Government Annual Report. (See section 3.3.2.)
- Gear state investments, such as tax and innovation subsidies, more intensively and with greater impact toward projects that promote the sustainable development focus areas – 1) A carbon-neutral and resource-wise Finland and 2) A non-discriminating, equal and competent Finland.⁴⁹(See section 3.2.2.)

4. Strengthen the monitoring of the 2030 Agenda goals and its scientific support. Improve the viability of indicator data.

- Use the 2030 Agenda as the basis for national sustainable development work and apply its goals in a national context for Finland. (See section 3.1.1.)
- Develop national sustainable development indicators by more fully integrating them with the 17 SDGs. The collection of SDG indicator data already begun by Statistics Finland can be used for this purpose and supplemented with indicators from the national system. Strive to establish **a single clearly visualised indicator system**, which serves as a broad-based, topical benchmark for discussion. (See section 3.1.1.)

⁴⁸ The state budget was analysed in accordance with the focus area "A carbon-neutral and resource-wise Finland" for the first time in 2019 in connection with the draft budget. See also Ministry of Finance (2019).

⁴⁹ Naumanen, M (2019). Unpublished draft of the Sustainable Development Innovations in Support of the 2030 Agenda (Kestävän kehityksen innovaatiot tukemassa Agenda 2030 - KITA) project. VTT Technical Research Centre of Finland

- Emphasis the viability of data so that it is easy to monitor the achievement of goals and developmental trends. When the target levels have been set, the indicator data should be compiled and visualised in a way that is appropriate to Finnish conditions. (See e.g. Figure 6 and box 2.)

Developing a sustainable development operating model

5. The Expert Panel on Sustainable Development should play a more visible and influential role as the interpreter of science.

- Enable the work of the independent Expert Panel on Sustainable Development with sufficient and permanent resourcing and integrate it more closely with decision making. Secure the mandate of the Panel with, for example, **a Government decree**. The Expert Panel operating model could borrow from solutions used by the Finnish Climate Change Panel. However, this should be done in such a way that its link with the administration would be through the 2030 Agenda Coordination Secretariat in the Prime Minister's Office. (See section 3.2.2. and Appendix 10, which is available in Finnish)
- Assign the Panel the role of a high-level, independent sparring partner and system-level interpreter for dealing with sustainable development issues. Assign the Expert Panel **a mandate** and provide it with an opportunity to comment on key Government plans that are key to sustainable development, such as Government Programmes and important bills, during their preparatory phase. (See section 3.2.2. and Appendix 10, which is available in Finnish)
- Ensure that the sustainable development perspective plays a key role in the reform of science advice and clarify the Panel's role as part of the science advice entity. Support institutional learning, which facilitates the more effective and systematic application of research data in sustainable development policy decision making and the preparation of decisions. (See section 3.2.2. and Appendix 10, which is available in Finnish)
- As a key actor representing the scientific community, the Expert Panel more effectively sparks public debate on **a fair economic system that takes the carrying capacity of nature into consideration** and facilitates the achievement of the 2030 Agenda goals. (See section 4.3. and box 2)
- The Panel should be heard on the data needs of sustainable development in preparations by, for example, the Finnish Government's Analysis, Assessment and Research Activities (VN TEAS). (See section 3.2.2. and Appendix 10, which is available in Finnish)
- In addition to the Panel, other operating models (such as web-based models) are adopted so that a broader spectrum of expertise from the scientific community can be more effectively utilised in administration and decision making. (See section 3.2.2. and Appendix 10, which is available in Finnish)

6. The Finnish National Commission on Sustainable Development should address current transformations more intensively and create a common understanding of the big situational picture. The Agenda 2030 Youth Group deserves to have a permanent institutional role.

- The Finnish National Commission on Sustainable Development should be more closely involved with Government strategy work. The Commission could address, in particular, extensive, current reform projects, in which: a) there is a need to understand the impacts of transformations on various areas of sustainable development and Finland's global role; and b) it is useful to bring high-level decision-makers, researchers and representatives from civil society together. (See sections 3.2.2. and 4.2.)
- The Commission's working methods should be updated: Ministries, the Expert Panel and representatives from civil society could suggest topics to be addressed on the Commission agenda. Some of the meetings should be open to all. At the meetings, a mandate could be given to smaller groups to continue working on an issue addressed at the meeting in a composition that would be useful to the work of the Government or some other key actor. (See section 3.2.2. and Appendix 10, which is available in Finnish)
- The institutional role of youths in sustainable development policy should be increased. A permanent mandate and budget should be established for the Agenda 2030 Youth Group. The Agenda 2030 Youth Group should be heard in sustainable development policy. (See section 3.2.2. and Appendix 10)

7. Cities should be supported in the implementation of the 2030 Agenda.

- Cities' strategic implementation of the 2030 Agenda should be supported. Support could be provided by either the Prime Minister's Office or, for example, the Ministry of the Environment. Coordination is needed in, for example, to support cities' sustainable development budgets, the development of management systems, and preparations for the monitoring and reporting on the state of sustainable development at the city level. (See section 3.2.2. and Appendix 10, which is available in Finnish)

8. Ministries should include sustainability targets in the drafting of legislation. Key Government bills and budgets should be assessed from a sustainable development perspective.

- **A systematic, cross-administrative evaluation system** should be established to support sustainable development policy, and key legislative and reform projects should be assessed with **sustainable development impact evaluation** type of instruments⁵⁰. (See section 3.2.3.)

⁵⁰ E.g. Hämeenlinna case study on the assessment of sustainable development in urban planning. <http://www.hameenlinna.fi/pages/67514/Jul35.pdf>

- The mandate of the **Finnish Council of Regulatory Impact Analysis** to issue statements on the impacts that key bills have on sustainable development focus areas should be expanded. This requires that the achievement of the 2030 Agenda goals also be included in the drafting guidelines for Government proposals and impact evaluation guidelines. (See section 3.2.3.)
 - Key bills should require not only an impact evaluation, but also a follow-up evaluation on sustainable development impacts, for example, 2-3 years after the bills are enacted into law. (See section 3.2.3.)
- 9. Ministries and the Prime Minister's Office should ensure that the necessary human resources are provided to facilitate the long-term and consistent performance of sustainable development work.**
- The internal and high-level coordination within and between ministries involving issues important to sustainable development should be enhanced, such as by inviting chief secretaries to discussions held by the Finnish National Commission on Sustainable Development. (See section 3.2.2. and Appendix 10, which is available in Finnish)
 - The resourcing, expertise and networking of sustainable development work performed by sector experts in different fields should be enhanced, so that the work will not be left to individuals and personnel turnover will not interrupt the continuity of work. (See section 3.2.2., Appendix 10 and section 4.1 in Appendix 14, which are available in Finnish)
 - Resources for communications, interaction and other support functions of the 2030 Agenda Coordination Secretariat should be increased. (See section 3.2.2. and Appendix 10)

Foreign policy recommendations

- 10. The Government should further enhance the impact and coherence of Finland's cross-administrative sustainable foreign policy.**
- The promotion of sustainable development should be mainstreamed in all inter-ministerial foreign policy.
 - There is a need for a credible roadmap **for increasing official development aid to 0.7 per cent** of the GNP and a broad-based commitment to achieve this target. In connection with this, financing for the UN system should be restored to its previous level and further increased. (See section 3.3. and Appendix 14, section 4.1, which is available in Finnish) Foreign and development policy reports should be consolidated using a sustainable development framework and the mandate of the Development Policy Committee should be sanctioned by Government decree. (See section 3.2.3. and Appendix 14, which is available in Finnish)
 - Key sustainable **foreign policy areas** outside the Ministry for Foreign Affairs Department for Development Policy should be identified in different ministries, and ex-

pertise in taking sustainable development into consideration should be further supported (e.g. trade, investments, international taxation). (See section 3.3.1., 3.3.2 and Appendix 14, which is available in Finnish)

- **A transparent policy alignment regarding the Finnish positions in multilateral institutions** should be drafted to support the participation of Parliament and stakeholders in influencing sustainable foreign policy. (See section 3.3.2. and Appendix 14, sections 5.3. and 6, which are available in Finnish)
- With regard to this, an effort must be made to ensure that Finland's EU policy alignments are in line with the SDGs. (See section 3.3.1. and 3.3.2.)
- Possibilities for using Ministry for Foreign Affairs development policy strategy maps should also be investigated more extensively in the state administration. (See section 3.3.2. and Appendix 14, section 5.1, which is available in Finnish)
- It should be ensured that Finland's sustainable development policy reduces inequality in accordance with the Leave No One Behind principle, and the evaluation of all foreign policy human rights impacts should be developed. (See section 3.3.1., 3.3.2 and Appendix 14, section 6, which is available in Finnish)
- The gathering and evaluation of information related to the Leave No One Behind principle and human rights based approach should be developed. (See section 3.3.1., 3.3.2 and section 4.4.)

Monitoring and evaluating in the future

In light of this evaluation work, it can be stated that there is just cause to conduct a more comprehensive developmental evaluation (Patton 1994) on the state of sustainable development, policy implementation and impact once every government term. This would make it possible to find the necessary scientific basis for making broad-based changes. However, it is also important to develop continuous monitoring as well as the use of, for example, forecasting data and big data.

Annual monitoring, and development based on it, can be implemented in accordance with the recommendations made in the PATH2030 evaluation as follows:

- When targets are set for key indicators describing the state of sustainable development in Finland, the achievement of these targets must be monitored at least on an annual basis
- In connection with the Government Annual Report, the “State of Finland” Report should be published. It should use indicators that are in accordance with the goals of the 2030 Agenda. Progress on implementation of the 2030 Agenda roadmap is also monitored in connection with the Government Annual Report.
- When targets have been set for budget shares promoting sustainable development, their achievement is monitored on an annual basis in the Government Annual Report.
- Strengthening the role of the Expert Panel on Sustainable Development and Finnish Council of Regulatory Impact Analysis paves the way for continuity in monitoring.
- If one of the set targets are not achieved, ways to do so are actively sought by changing policy.

Finland has opportunities to set an internationally important example in the evaluation of sustainable development policy, thus encouraging also other states to draft more coherent sustainable development policies. In order for an evaluation to have an impact, it must be developmental and independent.

The next evaluation could focus on two things:

- Firstly, it could examine how well a government committed to the principles of sustainable development would adhere to them in its decisions.
- Secondly, there must be an analysis of whether the instruments being used have moved society in the right direction. This is done by, for example, examining the achievement of the 2030 Agenda goals and sustainable development budget targets.

In order to serve as an even better global example, Finland could also request that a public sustainable development evaluation to be conducted by an important and influential outside party (e.g. OECD) at the end of the next Government term. This kind of evaluation has never been conducted before. For the sake of impact, it is vital that the results will be published as well as that these results and the methodology used are discussed with experts. Likewise, it is important to invite civil society to discuss the consequences of policy where sustainable development is concerned.

The monitoring and evaluation of cross-administrative foreign policy also needs further development. This evaluation examined cross-administrative foreign policy in relation to up-and-coming themes in development and foreign policy, i.e. the role of the private sector in international development. This resulted in the involvement of ministries other than those normally dealing with development policy. However, foreign policy and global impacts are also related to a wide range of other themes: The analysis of foreign policy impacts throughout sustainable development work needs to be further developed. In this respect, there is also a need to continue the examination of the human rights-based approach and the Leave No One Behind principle.