

EVALUATION DEPARTMENT



REPORT 8/2018



Evaluation of Norwegian Efforts to Ensure Policy Coherence for Development

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This report is the product of its authors,
and responsibility for the accuracy of data included
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interpretations, and conclusions presented
in this report do not necessarily reflect the views
of the Evaluation Department.

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Foreword

Policy Coherence for Development means working on wider aspects of development in addition to development aid, such as trade, migration, investments, climate change, and security. It goes across government departments, and includes coordination with other national and international actors. OECD puts it as *“ensuring that policies do not harm and where possible contribute to international development objectives”*.

Norwegian governments have expressed their commitment to ensuring Policy Coherence for Development on several occasions, latest in the Jeløya Declaration, which constitutes the political platform of present Prime Minister Erna Solberg's government. Norway is also committed to achieve the sustainable development goals of Agenda 2030 where Policy Coherence for Development is a specific target.

The purpose of this evaluation is to contribute to increased knowledge on initiatives undertaken by the Ministry of Foreign Affairs and other Norwegian actors to ensure policy coherence for development, and to shed light on dilemmas emerging from contradictions between international development objectives and other Norwegian objectives, and how these have been addressed by Norwegian actors. The report calls for more open and transparent discussions on real dilemmas and priorities, as there are some true dilemmas and choices to be made. Is Policy Coherence for Development possible? If so, how can we move from rhetoric to implementation?

We believe this evaluation provides an important contribution to the governments discussions on how to ensure policy coherence for development.

The evaluation was carried out by a team from Fafo Research Foundation in collaboration with the Peace Research Institute Oslo (PRIO). We thank the team for a job well done.

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Per Øyvind Bastøe

Director, Evaluation Department

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The report is the responsibility of the evaluation team and does not necessarily reflect the views of Norad's Evaluation Department, the Norwegian Ministry of Foreign Affairs or any of the organizations or individuals interviewed. Any factual errors or misinterpretations are the responsibility of the evaluation team (Fafo and PRIO).

Executive summary

INTRODUCTION

According to the OECD, Policy Coherence for Development (PCD) can be seen *“as a systematic promotion of mutually reinforcing policy actions across government departments and agencies creating synergies towards achieving the agreed objectives, where development policy shall lead and other policy areas should ensure to be coherent with this”*. Accordingly, the organization defines PCD as *“ensuring that policies do not harm and where possible contribute to international development objectives”* (OECD 2008).

Norwegian governments have expressed their commitment to ensuring PCD on several occasions, first in the Government White Paper 35 (2003–2004) “Fighting Poverty Together – A coherent Policy for Development”, and most recently in White Paper 25 (2016–2017) “Common Responsibility for Common Future”. In addition, PCD was mentioned in the 2013 “Sundvolden Declaration”, which constituted the political platform of present Prime Minister Erna Solberg’s first government. PCD is a key premise for achieving the visions

of Agenda 2030, which Norway has vigorously promoted. PCD is, moreover defined as a specific Sustainable Development Target (SDG17:14).

This evaluation reviews Norwegian efforts to ensure PCD, with special attention paid to the period since the publication of the report from the Policy Coherence Commission in 2008 (NOU 2008:14). It marked a turning point in the Government’s commitment to PCD by outlining some key Norwegian policy “dilemmas” and gave a set of recommendations for how to deal with them in order to ensure PCD. The report has served as a key reference and “baseline” for the present evaluation.

PURPOSE AND OBJECTIVES OF THE EVALUATION

The purpose of this evaluation is to contribute to increased knowledge on: 1) The initiatives undertaken by the Ministry of Foreign Affairs and other Norwegian actors to ensure policy coherence for development; 2) A number of dilemmas emerging from contradictions between international development objectives

and other Norwegian objectives, and how these have been addressed; and 3) How Norwegian efforts to ensure PCD play out in a developing country prioritized in Norwegian development cooperation. Myanmar was selected for a case study, partly because an increasing number of actors, both traditional and non-traditional development actors, have become engaged there in the most recent years, meeting a number of difficult challenges.

More specifically, the objectives of the evaluation are to:

- › Map and describe initiatives taken by the MFA to ensure policy coherence for development, including all Norwegian stakeholders
- › Identify and analyze dilemmas at the intersection of development policy and other policy areas
- › Analyze how these dilemmas have been addressed by the MFA and other Norwegian actors

- › Assess the MFA's efforts to ensure policy coherence for development against best practice as described in OECD or other relevant guidelines
- › Formulate lessons learned from the Norwegian engagement in Myanmar, and provide recommendations for the future

METHODOLOGY AND DATA SOURCES

In order to be able to analyze the process of how initiatives and mechanisms to ensure PCD has come about, the evaluation team has used a Pressure-State-Response (PSR) model, where dilemmas are accentuated by actors pressuring the government to take initiatives to ensure PCD. We define "dilemmas" as *contradictions or incoherencies* brought to the attention of policymakers and other stakeholders by actors such as NGOs, political organizations or international institutions. These signals may or may not lead to efforts to ensure PCD. If such efforts are made, the effect is determined by their type and quality, which may in turn trigger new incoherencies.

The main sources used in the evaluation are: 1) Fifty interviews with informants in the government (principally the MFA), civil society organizations (CSOs), political parties, business companies, and research institutes

in Norway and Myanmar; 2) Literature and public documents, primarily reports from CSOs and other actors, documents on international experiences, Government white papers and national budgets including the annual reports on PCD attached to the budgets; and 3) Government archives, including annual instructions to foreign missions, annual plans for the embassies in Yangon and Bangkok, and annual allocation letters to the embassies.

FINDINGS

Core dilemmas related to Norwegian PCD

The evaluation has identified more than 40 relevant dilemmas (see Appendix 5). While most of them have been addressed, three have been left in place as constant incoherencies. These are:

1. The contradiction between Norway's dependence on income from the export of oil and gas and its declared willingness to contribute towards halting global climate change.

In addition to the petroleum industry and actors depending on it, the MFA, Ministry of Petroleum and Energy, the Ministry of Climate and Environment, the Ministry of Commerce, Trade and Fisheries, and Parliament are all strongly affected by this dilemma.

2. The dilemma represented by the contradictory desires to protect Norwegian agriculture and rural settlement, and to increase imports from low- and medium-income countries.

The many actors within the agricultural sector, the MFA, Ministry of Commerce, Trade and Fisheries, the Ministry of Agriculture and Food, and Parliament are all engaged in tackling this dilemma.

3. The dilemma between upholding Norwegian security interests and advancing human rights.

Promotions of peace and security may, in some instances, go against promotion of universal human rights. Dilemmas of security versus human rights are related to Norway's role as a good ally, as a protector of its own weapon industry, and as a promoter of stricter regulations of arms exports. It is partly an economic, but mostly a political, issue.

Dilemmas stemming from Norway's emergence as a major exporter of capital have been responded to in various ways. Investments by the Norwegian Pension Fund Global are seen by many of our respondents as "the elephant in the room" when it comes to Norway's ability to influence global development. Some see an essential need for clearer regulations and guidelines. The establishment of the Ethical Council of the Fund in 2004 is one of few

examples of how remedies are sought that may remove the most blatant expressions of fundamental dilemmas.

Handling of dilemmas and promotion of PCD

Following the recommendation from the report of the Policy Coherence Committee in 2008, a designated unit in the Department for Economic Relations and Development in the MFA, the Section for Development Policy, was given the responsibility for producing an annual report on PCD to Parliament (Storting). This unit is mandated to coordinate reporting in collaboration with other ministries, and to promote and facilitate PCD among the ministries through its responsibility for the Development Policy in general. However, the unit has no power to direct the policy or activities of other ministries towards ensuring PCD.

The annual report from the government to Parliament is the only formalized mechanism established for the sole purpose of promoting overall PCD in the government system. However, the format of the annual PCD reports as part of the yearly budget proposal to Parliament imposes important limitations on how the report is structured and what issues can be presented. It is important for the government to report on good performance

in these reports, and not to undermine the efforts of the sitting government. Although Norway does a great deal on both the international and the national levels to ensure PCD, the format makes it almost impossible for the reports to address the most important contradictions in Norwegian policies. The fact that the report has had a different focus area every year also makes it difficult to use it to track progress on any particular aspect of PCD. Several informants emphasize that the fact that reporting is a joint effort between different ministries makes it even more difficult to mention incoherencies, because each ministry needs to report in a favorable manner within such a format. The fact that the MFA does not have a clear mandate to coordinate efforts of PCD also makes it difficult, if not impossible, to “force” other ministries to report on potential dilemmas and incoherencies.

In addition to the annual report on PCD, the MFA uses the following more indirect tools to promote PCD in the government system: Establishment of Inter-ministerial and multi-actor advisory groups, working groups, consultative bodies and committees, such as the Policy Coherence Committee in 2008; Initiation and development of Government white papers, which may involve other ministries; development of frameworks and guidelines

across ministries and departments, such as the Strategic Framework for Norwegian Efforts in Fragile States (MFA 2017); and action plans, which may promote intra-ministerial cooperation, such as the “Business and Human Rights – National action plan for the implementation of the UN Guiding Principles” (MFA 2015). Interestingly, these initiatives have primarily been initiated in response to specific challenges and do not stem from any political or bureaucratic process seeking to ensure policy coherence as such. In fact, the concept of PCD is rarely referred to in the MFA by anyone except the few persons designated to work with it.

The MFA’s ability to handle dilemmas related to PCD is constrained by its lack of formal power (hierarchical mechanisms) to interfere in other ministries’ policy decisions, and the deep-rooted notion of sectoral responsibility (Lægneid et al. 2013). According to our respondents, there is no “culture” within the government of interfering in other ministries’ policies beyond informal discussions and cooperation and consultation in inter-ministerial working groups and committees. Several respondents highlight the structure of Norwegian government institutions as a huge challenge when it comes to handling policy incoherence within and between different policy areas. The relative independence of different ministries and the

lack of institutionalized arenas for cooperation between ministries make working towards PCD challenging.

Efforts to ensure PCD compared to international best practices

Countries organize their work towards PCD in different ways, and the Norwegian approach is characterized by informality and the case-by-case handling of dilemmas and incoherencies. This distinguishes Norway from those referred to as “best practice” countries, such as Sweden and the Netherlands.

Formalized mechanisms in other countries include: linking commitment to PCD with the national legislation (Sweden and Belgium); establishing designated and overarching government units with special responsibility for PCD (the Netherlands until 2012); mandating government units responsible for PCD with the power to direct other ministries in conflicts related to ensuring PCD (the Netherlands until 2012); sets of indicators developed by academic institutions for monitoring of PCD (Ireland); and structured ministry reporting formats, including identification of dilemmas, goals for PCD, and measurement of progress (Sweden).

However, international experiences also show that commitment, awareness of the PCD

concept, and the mandates given to the responsible actors are more important than the type of organization established and formalization of mechanisms as such. This is also reflected in the fact that all “best practice” countries have proven to be vulnerable to loss of political momentum with respect to their work towards ensuring PCD, independent of organizational structures (ecdpm 2013). Hence, all PCD systems seem to depend on outside pressure, politically or by civil society actors.

The vast majority of government respondents interviewed for this evaluation see the “system of informality” as a unique national strength. It ensures the flexibility needed for the government to respond efficiently to changing contexts. The same respondents claim that the system works well towards ensuring PCD, and that it is important not to introduce more formal mechanisms.

However, although there are indeed some good arguments for claiming that the informality of the Norwegian governmental and bureaucratic system does produce the flexibility and open access needed for being able to respond to signs of incoherence, such a system has also shown an inability to deal with the more fundamental dilemmas

of PCD related to climate, trade and security. It is also questionable whether the present system is able to deal with the future requirements for PCD related to fulfilling the goals of Agenda 2030.

FINDINGS FROM THE MYANMAR CASE EVALUATION

Potential dilemmas related to Norwegian PCD

The two main potential dilemmas identified in Myanmar were: Norway’s business engagement and the commitment to peacebuilding, and the engagement in natural resource development and the commitment to ensuring peace. In addition, several dilemmas concerning how to achieve the overarching Norwegian development goals of supporting democratization and building peace were raised by respondents, of which the most profound was the dilemma between being more vocal in the criticism of the Myanmar government for the present crisis in Rakhine versus continuing the cooperation with the government, as previously seen.

From 2014, the Solberg government outlined clear expectations to promote Norwegian businesses in developing countries. This presented the Embassy with a dilemma on how to integrate this policy into the long-term priority to support democratization

and peace in Myanmar. There were potential conflicts of policy objectives between business and peacebuilding in this trade-off. While the Embassy is content with how this is balanced in Myanmar, a number of development organizations, humanitarian organizations and CSOs remain concerned about the potential risk that foreign investors with little knowledge about Myanmar's many conflicts could undermine the peace process.

However, CSOs and various Myanmar stakeholders are generally positive towards Norwegian investments in Myanmar, overwhelmingly due to the good reputation of Telenor. There is a clear assessment that Myanmar is in need of responsible foreign invested businesses and it is assumed that Norwegian companies have better standards and are more accountable than other corporations, typically from other Asian countries. There are, nonetheless, several dilemmas for the Norwegian Embassy in ensuring that Norwegian companies know the local context and power structures, and that they operate in a responsible, accountable, transparent, and conflict-sensitive manner. Embassy staff and stakeholders in Myanmar underlined that these dilemmas are greater for smaller companies than for larger, partly state-owned corporations such as Telenor.

A difficult task for the Norwegian government's development agenda in Myanmar has been to incorporate the peace agenda into the sustainable management of natural resources. It cannot be expected that technocrats and engineers in Norwegian companies and agencies in the natural resources management sector should be able to develop full contextual mappings and strategies for conflict sensitivity in contested areas.¹ This responsibility must be shared with the MFA, and the hydropower program with the Myanmar Ministry of Energy and Electricity is a good example of how it can be achieved. The case of SN Power's (owned by Norfund) planned Middle Yewya hydropower project in Myitnge river in western Shan State is an example of a private-sector initiative where the contention between the management of natural resources and conflict sensitivity has been more challenging.

Handling of dilemmas and promotion of PCD at country level

In general, the handling of dilemmas and promotion of PCD by the Embassy in Yangon reflects the "informal" Norwegian approach to ensuring PCD. There were few overarching guidelines in the annual instructions and

¹ A Baseline Study of Norwegian Development Cooperation within the areas of Environment and Natural Resources Management in Myanmar, Fafo, May 2015.

annual allocation letters to the embassies in Bangkok and Yangon in the period 2008–2017. No formal mechanisms or systems to ensure PCD have been initiated. When specific policies are promoted and emphasized by the government, the embassies are obliged to comply with these policies and implement them locally. It is then up to the embassies to handle potential incoherencies between new policies and existing strategies or local commitments.

The Norwegian Embassy in Yangon generally handles dilemmas in an ad hoc manner, through consultancy and informal communication with stakeholders. The Embassy arranges regular consultation meetings with the Norwegian NGOs operating in Myanmar and meets irregularly with their partners. However, the NGOs do not feel that they have any impact on Norwegian priorities.

The Embassy also meets with the Norwegian business sector in Myanmar and is involved in the Myanmar-Norway Business Council. In 2016, the Embassy cooperated with the Myanmar-Norway Business Council and Innovation Norway in producing a business guide for Norwegian investors in Myanmar.²

² Myanmar: A Business Guide for Norwegian Investors, Myanmar-Norway Business Council, January 2016.

This guide could be seen as an initiative to ensure PCD, although it mainly addresses practical issues. It does not discuss dilemmas of investments and peace and development, and the considerations of conflict sensitivity, political dynamics and contested power structures, the way as the Norad-funded investment guide launched by the Norwegian Burma Committee in 2017 does.³ However, the Embassy does contribute to an increased awareness about responsible investments in conflict areas through the support to the Myanmar Centre for Responsible Business.

The Norwegian Embassy in Yangon is generally viewed as being open and accessible to stakeholders in Myanmar. The informal consultations seem to work, although there is little cross-sectoral interaction facilitated by the Embassy, where NGOs and the business sector are brought together. The Embassy keeps close contact with the Myanmar team at the MFA about strategy, dilemmas and challenges in bi-weekly telephone conferences, and otherwise whenever needed. While not explicitly intended to ensure better PCD in the Norwegian engagement in Myanmar, these consultations are examples of initiatives that can have that effect.

³ Hvordan redusere risiko: En guide for norske selskaper i Myanmar, The Norwegian Burma Committee, February 2017.

RECOMMENDATIONS

A general recommendation from this evaluation is that *more formalized mechanisms should be established to make the present system of ensuring PCD more proactive*. The present system, characterized by informality and flexibility, is primarily reactive in the sense that it is relatively fit for dealing with dilemmas and incoherencies within individual sectors when they have emerged, but less fit for handling potential dilemmas before they emerge and to plan for synergies towards development goals between different sectors and policy areas. A proactive system will be even more important in relation to the Government's work towards fulfilling its commitment towards Agenda 2030 and the global SDGs. Hence, the specific recommendations to inform the future work on PCD in the MFA given below should be integrated with Agenda 2030 initiatives whenever possible.

Recommendations with reference to overall efforts to ensuring PCD:

1. Develop awareness of and focus on PCD within all parts of the government

An awareness of the potential benefits is the cornerstone of any system to ensure PCD. Experience has shown that such systems work best when responsibilities are shared by all

government departments and units. The Swedish model of allocating responsibility for PCD to all ministries might serve as an organizational model for a new Norwegian initiative, although the reporting mechanisms might differ.

2. Develop systematic, evidence-based and accountable reporting mechanisms

Accountable and evidence-based monitoring of PCD is an important premise going forward. Monitoring systems do not need to be rigid or based on numerical indicators, but they need to be based on clear goals and unbiased measurement of progress towards these goals over time. Hence, the identification of challenges (incoherencies) and goals should be seen as an important exercise. Efforts should be made to re-shape the existing reporting mechanism and format to include: identification of dilemmas and incoherencies; definition of clear goals for improving for solving the dilemmas and incoherencies; and balanced and un-biased measures of progress towards the goals.

3. Involve external stakeholders, i.e. civil society, business actors, and academic/ - research institutions, in mechanisms for ensuring PCD, including in monitoring and reporting mechanisms

By involving external actors in initiatives to ensure PCD the Norwegian government may

obtain useful external views and capitalize on knowledge gained within various sectors. External actors may be involved in monitoring progress and can contribute to identifying dilemmas and set priorities. The planned dialogue forum on coherence may serve some of these purposes. The Ethical Council of the Norwegian Pension Fund Global provides an example of a way to involve external stakeholders.

4. Promote cross-ministerial dialogue and cooperation

Formal inter-ministerial committees in the most important cases led by a government minister, as well as informal groups and networks, should be developed as tools for ensuring PCD, with the aim of developing synergies between different policy areas. A system for exchange of staff between ministries may also be considered.

5. Consider to establish an overarching or cross-departmental unit within the government system with responsibility of promoting and coordinating efforts towards ensuring PCD

It is difficult to see how the Government's efforts to ensure PCD may move from being reactive (responding to "harm") to being proactive (planning for synergies) within the present ministerial system of

sectoral responsibility. Establishment of an "independent" unit is probably a premise for further development of effective efforts to ensure PCD, whether such a unit is only mandated to promote PCD within and between ministries or to direct in cases of emerging dilemmas or incoherencies.

Recommendations with special reference to Myanmar:

1. Formulate a strategy that outlines the objectives and the strategic approaches of Norway's engagement in Myanmar

The overall strategy for the Norwegian engagement in Myanmar is not clearly documented and Norway has been criticized by external actors for perceived inconsistencies. In addition to contributing to clarifying priorities and avoiding misunderstandings, a strategy could serve as the cornerstone in a Norwegian effort to promote PCD in Myanmar.

2. Establish a forum of Norwegian NGOs, local CSOs and the business sector for strategic discussions on the SDGs, PCD and the democratization and peace agenda in Myanmar

Although the Embassy has good informal dialogue with Norwegian actors in Myanmar, a more formal forum for exchange of information, experiences and viewpoints may contribute towards PCD.

Such a forum may be used to ensure that all Norwegian business actors and development agencies benefitting from Norwegian government support are trained in conflict sensitivity and the political context in Myanmar to ensure PCD on the ground. The Swedish Embassy in Myanmar has established such a forum and engages the external actors in its annual process of strategy development.

3. Consider defining coordination related to PCD (in relationship with the follow-up of Agenda 2030 and the SDGs) as a specific working task at the Embassy in Yangon

If PCD coordination were defined as a specific task at the Embassy this would contribute to building awareness of the concept. It could also serve as a driver to gain a better overview of all Norwegian engagement in the country, including projects and activities presently implemented by multilateral and other development actors beyond the purview of the Embassy. Knowledge of activities funded by other Norwegian actors, including government units, or implemented by multilateral organizations, would create the opportunity to create more synergy between different Norwegian activities. By having PCD coordination as a specific task, the Embassy could also promote the establishment of formal mechanisms to report on PCD-related issues to the MFA.

1. Introduction

1.1. BACKGROUND

Policy Coherence for Development (PCD) refers to the integration of different aspects of international development within national policymaking. PCD is particularly relevant to a “beyond aid” approach, which entails working on wider aspects of development in addition to development aid, such as trade, migration, investments, climate change, and security, across government departments and with other national and international actors. PCD has become increasingly important along with a stronger trend towards globalization during the last couple of decades, and the prospects of developing countries and global development in general are presently being shaped by a wide range of globally interconnected factors, activities and actors.

During the last couple of decades, Norway has become a more influential actor in many fields that are important for international development. Norway is today a major oil-producing country and the Government Pension Fund Global (GPF) is the world’s largest sovereign wealth fund, just having passed

one trillion USD in assets and holding significant shares in multi-national companies, including major companies such as Nestlé SA, Royal Dutch Shell, Amazon, Apple and Microsoft. During the same period, Norwegian businesses have expanded their activities internationally in various fields such as energy, telecom, fertilizer and metal production, and some of the largest of these companies are partly or fully owned by the Norwegian state.

Norway’s expanding international engagement, and ability to influence international development, involves different actors with different objectives and interests, including different government ministries with responsibilities for different policy areas. It also exposes dilemmas between these different interests, of which dilemmas between national economic and political interests and the interests of developing countries, or the global population as a whole, are of special concern. In this context, policy coherence is of vital importance for ensuring that Norway’s “beyond aid” policies are supportive of – or at least do not undercut – internationally

agreed development goals, and that Norway’s aid efforts in developing countries are not undermined by other Norwegian activities with an impact on the same countries.

Norwegian governments have expressed their commitment to ensuring PCD on several occasions, first in the Government White Paper 35 (2003–2004) “Fighting Poverty Together – A coherent Policy for Development”, and most recently in White Paper 25 (2016–2017) “Common Responsibility for Common Future”. In addition, PCD was mentioned in the 2013 “Sundvolden Declaration”, which constituted the political platform of present Prime Minister Erna Solberg’s first government. Moreover, the commitment has recently been re-stated in the political platform of the new coalition Government – the Jeløya Platform.

Norway’s efforts and performance in relation to ensuring policy coherence have been peer reviewed by the OECD Development Assistance Committee (DAC) at three occasions. Despite good overall reviews, recommendations call for more “independent” and research-based

evaluations of policy coherence efforts and more focus on actual change in policies and institutional set-ups to promote PCD in practice.⁴

In addition to responding to previous recommendations and improving approaches to ensure policy coherence for development, Agenda 2030 and the Sustainable Development Goals (SDGs) add a new layer of requirements for ensuring policy coherence in the period ahead. Through Agenda 2030, policy coherence for sustainable development is presented as an independent Sustainable Development Target (SDG 17:14). At the same time, policy coherence is of critical importance for creating synergies among SDGs as well as between different sectoral policies at the local, regional, national and international levels. Hence, an update of current Norwegian approaches to promoting policy coherence in an SDG context is needed. This includes making sure that existing institutional mechanisms are “fit for purpose” for the implementation of the SDGs.

The MFA has a responsibility for promoting and reporting on Norwegian PCD, through

4 «Fortsatt ustemt», Kirkens nødhjelp 2016; «Norway 2013», ECD Development Co-operation Peer Review; «Verdivalg og veivalg for en ny tid – KrFs alternative melding for morgendagens utviklingspolitikk», 2016.

its responsibility for the Development policy in general, and this evaluation is initiated to provide knowledge on Norwegian efforts to ensure PCD, with MFA as the main evaluation object. Myanmar is selected as a case to assess the practical implications of how these efforts play out at country level. Myanmar is one of the priority countries for Norwegian Official Development Assistance (ODA), and may provide useful insights as a case due to the fact that an increasing number of actors, both traditional and non-traditional development actors, are engaged in the country.

1.2. OBJECTIVES AND EVALUATION QUESTIONS

1.2.1. Objectives

The main objectives of this evaluation have been to:

- › Analyze how these dilemmas have been addressed by the MFA and other Norwegian development actors
 - › Assess the MFA's efforts to ensure policy coherence for development against best practices as described in OECD guidelines for policy coherence for sustainable development or other relevant guidelines
 - › Formulate lessons learned from the Norwegian engagement in Myanmar, and provide recommendations for how to work with policy coherence for development in the future
-
- › Map and describe initiatives taken by the MFA to ensure policy coherence for development, including mapping all Norwegian stakeholders in relation to policy coherence for development
 - › Identify and analyze dilemmas at the intersection of development policy and other policy areas

TABLE 1 // EVALUATION QUESTIONS

1. How does the MFA ensure policy coherence for development?

- a. What concrete initiatives have the MFA and other development actors undertaken in order to ensure policy coherence for development?
- b. What potential dilemmas are there in the intersection between development objectives and other objectives?
- c. How do the MFA's efforts to ensure policy coherence for development compare with best practices as described in guidelines by the OECD and others?

2. How did the MFA's work with policy coherence for development play out in Myanmar during the period covered by the evaluation?

- a. What were Norway's development policy objectives, which other policy objectives were there, and what were the respective interests of the various Norwegian actors in Myanmar? Were these coherent?
- b. What were the dilemmas in relation to policy coherence for development?
- c. How were these dilemmas addressed? How did the actors assess different options in different phases related to these dilemmas?
- d. Is there a system of feedback between the Embassy and the MFA that ensures learning from how various dilemmas have been addressed?

3. What are the main lessons learned and recommendations to inform the future work on policy coherence for development in the MFA?

1.2.2. Evaluation questions

In relation to the objectives presented above, the evaluation seeks to answer three primary questions and a set of sub-questions.

The two first primary questions refer to efforts made to ensure Norwegian PCD in general and to how these efforts are reflected in initiatives to ensure PCD at country level in Myanmar, respectively. The synthesis of findings derived from answering these questions provides the basis for answering the third primary question on lessons and recommendations for MFA's future work on policy coherence for development.

1.3. DEFINITION OF POLICY COHERENCE FOR DEVELOPMENT (PCD)

The following definition of Policy Coherence for Development is used as the basis for this evaluation:

"Ensuring that policies do not harm and where possible contribute to international development objectives"

(OECD 2008)

OECD adds to this definition that PCD should be seen as *"the systematic promotion of mutually reinforcing policy actions across government departments and agencies creating synergies towards achieving the agreed objectives"*, and further states that *"development policy shall lead, and other policy areas should ensure to be coherent with this."*⁵

In the OECD's latest framework on how to assess, implement and monitor PCD, the organization advocates a need for going beyond the "do no harm" ambition and for ensuring policy synergies towards stated development goals, with special reference to Agenda 2030 and the Sustainable Development Goals (SDGs).⁶ Although this

⁵ See Terms of Reference (p.1) in Appendix 1.

⁶ See: Annotations of the OECD PCSD Framework: Generic Module (http://www.oecd.org/pcd/ONLINE_Annotations_Generic.pdf).

new ambition sets the standard for how Policy Coherence for Development should be defined to comply with the objectives of Agenda 2030 in the years to come, there are two main reasons for not using this new understanding of PCD as a basis for this evaluation:

- › The underlined definition captures the "synergy" ambition of the new framework – in addition to the "do no harm" ambition. This makes it possible to analytically distinguish between initiatives of coherence aimed at: a) avoiding identified harm; and b) creating synergies towards overall development goals.
- › There is good reason to believe that many of the initiatives taken to ensure policy coherence in the time period for this evaluation (2008-present) are in the category of "avoiding harm", and that some of the initiatives were even designed to comply with the definition given above.

1.4. FOCUS AND BOUNDARIES OF THE EVALUATION

PCD is a complex topic, involving a wide range of actors, dilemmas and potential conflicts between policy areas and practices. In addition, these actors, dilemmas and conflicts operate at different scales, from the local to the global level, as well as between policy areas and within policy areas. Hence, a set of priorities had to be taken to delimit this evaluation from the outset. This also implies that there are relevant topics that are not covered in any detail, but which are relevant for a comprehensive coverage of PCD. Two delimitations that have been made and which are of special relevance in this respect are:

- › The evaluation covers efforts to ensure PCD up to the end of December 2017. Hence, the Government's commitments towards PCD as expressed in the new political platform of the present coalition government (the Jeløya Platform), and new relevant initiatives such as the re-introduction of a Minister of Development, are not covered explicitly by the evaluation.

› According to the evaluation’s Terms of Reference, dilemmas between different policy areas should be the main focus for the evaluation. However, there are also actors, dilemmas and potential conflicts within the Development policy and within the Development administration, including Norad, which are of relevance to PCD.

1.5. ETHICAL CONSIDERATIONS

This evaluation depends to a large degree on information from key informants, obtained through interviews. At the same time, the number of key informants, particularly within the government, is relatively limited. In this context, the evaluation team has taken every effort to anonymize individual respondents in the report. Where individuals may be possible to identify, this has been done in agreement with the respondents or/and in relation to expressions which are considered non-controversial and which represent general views. The evaluation team has also strived for carrying out the interviews in an informal manner, with a main focus on obtaining knowledge about the structure and behavior of the “system” for ensuring PCD rather than on evaluating the individual actors’ behavior and contributions within this system. The purpose of the evaluation and the purpose

of the interviews within the context of the evaluation were clearly and openly introduced to all respondents prior to each interview.

1.6. STRUCTURE OF THE REPORT

This report is basically structured according to the three main evaluation questions given in Table 1. Part 2 provides an overview of the methodological approach to the evaluation, including the data sources used and the analytical framework in which the data have been applied. Part 3 presents the findings from the evaluation of Norwegian efforts to ensure PCD in general since 2008, including an overview of actors and dilemmas related to PCD, and initiatives taken to ensure PCD. Part 4 presents the findings from the Myanmar case study of how the Norwegian “system” for ensuring PCD is understood and implemented at country level. The last part of the report, Part 5, summarizes the main findings from the evaluation and provides a set of recommendations based on the evaluation of efforts to ensure PCD in general and in the Myanmar case study in particular.

2. Methodology

2.1. METHODOLOGICAL APPROACH

The nature of this evaluation, with its focus on initiatives for ensuring Policy Coherence for Development (PCD) in general and in the case of Myanmar since 2008, calls for methods to explain processes and contextual factors behind the identified initiatives. Two suitable concepts for the purpose are *Process Tracing and an actor-based approach*. These two concepts have been used in combination.

2.1.1. Process Tracing

Process tracing consists of finding out how different actors interact in ways that produce a given outcome, and, instead of testing generalizing causal hypotheses, process tracing identifies the actors' level of importance, and how contextual variables influence their interaction (George and Bennett 2005, p.147).⁷ Therefore, process tracing relies on detailed and contextually rich information, and, when applied successfully, uncovers all the links in the chains of actions and other events that lead to certain

outcomes (Goldstone, 2003, pp.47–48). Alexander L. George and Andrew Bennett (2005) describe process tracing as taking a careful account of events in order of appearance, but with analytical stops to infer how one event is causally linked to another, and by seeking explanations for why some actors and events seem to matter more than others (Georges and Bennett 2005, pp.206–207). Process tracing is, in contemporary political science, the equivalent to narrative explanatory method in traditional historical science.

As in historical narratives, process tracing often reveals that more than one causal chain has contributed to a given outcome. For example, evidence might give us high confidence that a certain advocacy intervention caused a policy change, but this does not rule out the possibility that other factors external to the intervention contributed to the outcome. This has an important implication for the use of process tracing in impact evaluation: it allows for judgements on contribution rather than attribution.⁸

Although the methodology offers a set of relatively well-defined techniques for more rigorous causal analysis, e.g. to test the relative strength of various causes, employing such techniques has been outside the scope of this evaluation. Process tracing has been used just to guide our data collection and our analyzes of the data.

2.1.2. An actor-based approach

Policies, interests, initiatives and behavior are all attributes of actors. An actor-based approach refers to taking the actors' viewpoint in particular contexts in trying to understand decision and actions taken. There are several well-defined actor-based methodologies, including stakeholder analysis. However, the use of the concept in this evaluation merely refers to the process of mapping out the views, perceptions, interests, and motivations of the different actors in specific contexts of interest in order to explain the reasoning of the actors in response to events at the time they were happening.

⁷ George, Alexander L, and Andrew Bennett (2005) *Case Studies and Theory Development in the Social Sciences*. Cambridge: MIT Press.

⁸ CDI, 2015: *Straws-in-the-wind, Hoops and Smoking Guns: What can Process Tracing Offer to Impact Evaluation?* Centre for Development Impact, Practice Paper No 10 April 2015.

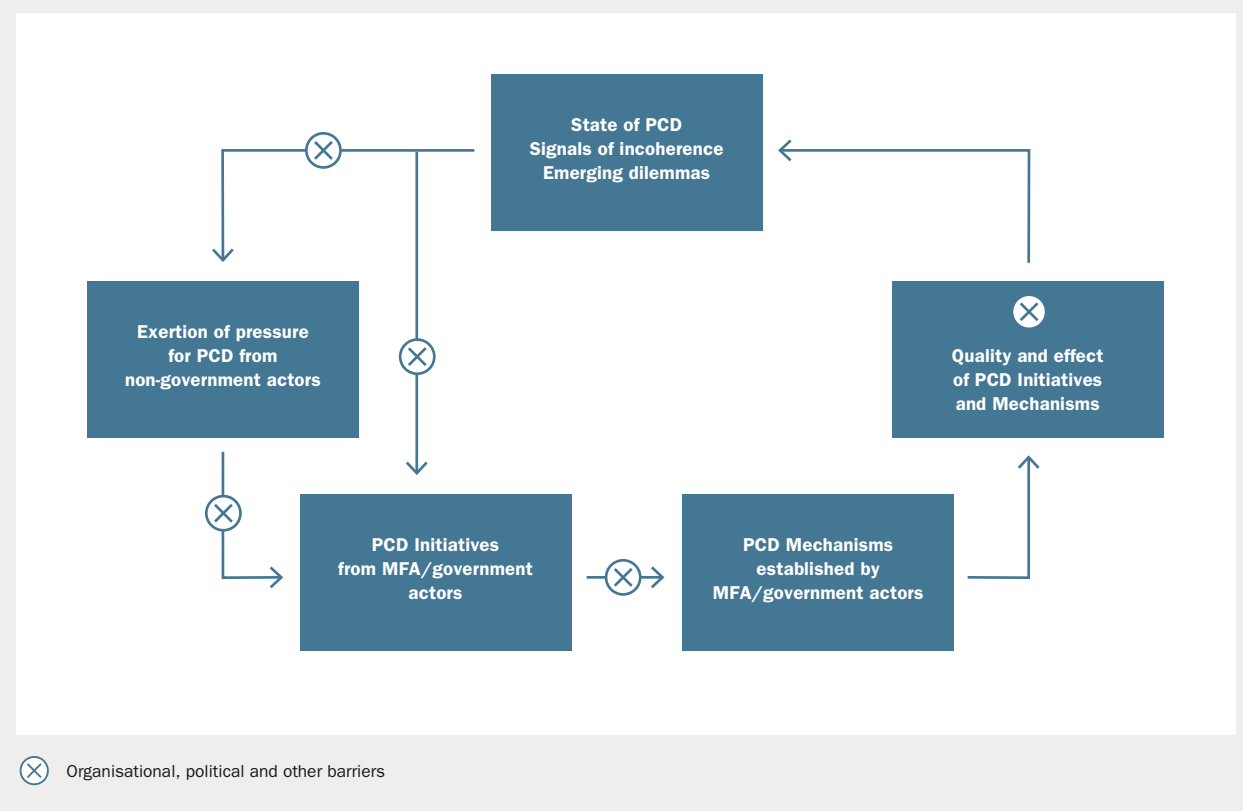
In this evaluation, mapping out the reasoning behind decisions and actions taken by various actors is an integrated part of process tracing. An actor-based approach helps explain the processes behind identified initiatives for ensuring PCD. In addition, it has helped identify multiple factors and contributions to the initiatives. The practical use of the concept in this evaluation is reflected throughout the analyzes presented in Parts 3 and 4.

2.2. Analytical model

As the main focus of this evaluation has been the process of ensuring PCD over time rather than on the state of PCD as such, we found it useful to capture the dynamics between the needs for PCD; the actors advocating or resisting PCD; the policymakers responsible for ensuring PCD; the initiatives taken to ensure PCD; and types, quality and effects of the mechanisms established to ensure PCD (Figure 1):

The model is developed from a general “Pressure-State-Response” model, and outlines a general process of developing response measures and mechanisms for ensuring PCD from an initial identification of dilemmas or emerging signals of incoherence. The model also distinguishes between different actors with different roles in this process,

FIGURE 1 // AN ANALYTICAL MODEL FOR EVALUATING THE PROCESS OF ENSURING NORWEGIAN PCD



including the roles and influences of the MFA versus other government ministries and actors. Beside the identification of actors and their roles in the process, the model is used to identify various political and institutional characteristics which prevent or support measures for ensuring PCD to be taken.

The need for PCD may be exposed by reviews of the state of PCD carried out by various actors at a variety of levels (international organizations such as the OECD, Norwegian CSOs or CSOs in recipient countries for Norwegian development aid), signals of incoherence (e.g. exposed through public media), or through

emerging dilemmas, e.g. being exposed in relation to plans for investments or business activities.

Actors within the government may capture these signals and they may take initiatives to respond to them. However, there may also be processes and actors within the government system (termed political and institutional obstacles in the model) that constrain the taking of initiatives. Signals may also be captured or forwarded by non-government actors, typically CSOs exerting pressure on the government to ensure PCD from the outside, or for producing certain actions that may undermine PCD. Again, the pressure for taking initiatives to ensure or detract from PCD may be constrained by processes and actors (barriers) influencing policy and decisions.

Initiatives for PCD undertaken by government actors may typically be in the form of evaluations and government white papers, recommending concrete measures for improving PCD. Such concrete measures are often mechanisms that are characterized by being formalized regulations and structures, e.g. reporting mechanisms or requirements for impact assessments. However, the transformation of recommendations from initiatives into formalized mechanisms may also be

constrained by processes and actors within the government system. In this context, it may be interesting to foreshadow the recommendations below, which reveal the authors behind the evaluation as actors seeking to generate formalizing processes.

Finally, the quality of established mechanisms determines their effects on PCD. However, as the main objective of this evaluation is evaluate “efforts” rather than “effects” with respect to ensuring PCD, the “quality” of the mechanisms is assessed against their compliance with documented best practices rather than against their “real” effects.

The political and institutional obstacles in the model are key focal points for this evaluation, and refer to various characteristics within and between government ministries and units which constrain initiatives and mechanisms for ensuring PCD. Such characteristics may be organizational, e.g. lack of inter-ministerial coordination structures and overarching goals; cultural, e.g. the struggle for independence and political control within ministries; or lack of general political will and commitment.

2.3. Data sources

The main data sources used in the application of the model described above have been interviews with key PCD actors in the government, with special attention to actors in the MFA, civil society, and the business sector; national and international policy documents and reports; and correspondence and documentation in MFA and Norad archives and databases, including budgetary and funding data. Table 2 shows what main data sources that have been used to address the various objectives of the evaluation. The interviewees and documents reviewed are listed at the appendices and in the list of references.

TABLE 2 // MAIN DATA SOURCES USED IN THE VARIOUS PARTS OF THE ANALYTICAL MODEL

Model Component / Evaluation objectives	Data sources
Mapping of stakeholders (all components)	Literature and public documents Key Informants
Mapping and analysis of dilemmas	Literature and public documents Key Informants
Map and describe initiatives taken to ensure PCD	Public documents Archives review Key Informants
Analyze the outcomes of initiatives	Public documents Archives review Key Informants
Map and describe PCD mechanisms	Public documents Key Informants
Analyze establishment and function of mechanisms	Key Informants Archives review
Assess efforts against best practices	Literature and public documents Key Informants
Assess the general state of PCD	Literature and public documents Key informants

2.3.1. Key Informants

Due to limited empirical documentation, interviews comprise the main source of information gathered. A total of 50 interviews have been carried out in Norway and Myanmar, with informants representing all main stakeholder groups involved in Norwegian PCD. The interview guides developed for the interviews have been dynamic and adaptable, but, in general, the guides have contained questions related to the following topics:

- › The actors´ understanding of PCD
- › Perceived and experienced dilemmas related to PCD
- › Initiatives taken to ensure PCD
- › Mechanisms established to ensure PCD
- › Prospects and constraints for ensuring PCD
- › Strategies and activities related to PCD
- › Organization and responsibilities related to ensuring PCD
- › Views on Norwegian actors´ organization and approaches towards ensuring PCD

2.3.2. Review of literature and public documents

The main reports and documents reviewed in this evaluation include: Documentation on the state and dilemmas of PCD produced by various actors, primarily non-government actors including NGOs and political parties; policy documents mainly produced by government actors; and documents on international experiences and best practices related to PCD. In addition, the team has reviewed a wide range of white papers on issues related to PCD (development, environment, business and finance) from various governments from 2003 to 2017. The team has also read and reviewed OECD reports (a number of peer reviews of Norway and other countries) and important PCD documents from other governments (Sweden, Denmark, Finland, the Netherlands, Canada and Ireland).

2.3.3. Archives review

The team has reviewed all archival documents at the MFA concerning the annual reporting on PCD from the government to Parliament, including the internal discussions prior to the establishment of this reporting, and assessments of the value of the mechanism. To trace the policy instructions from the MFA to the Norwegian foreign missions, and to Myanmar in particular, the team has additionally accessed more than 100 archival documents from the period 2008–2017. These are:

- › **The reports from MFA’s Myanmar team to the Minister of Foreign Affairs.** These are briefing notes provided for the Minister or the State Secretaries, typically prior to official visits to Myanmar.
- › **The annual instructions for the foreign missions, “årsinstruks for stasjonene” (2011-2017).** This is where the Minister of Foreign Affairs and the MFA present government policy and the general expectations for the foreign mission’s annual plans.

- › **The annual plans, “virksomhetsplaner”,** from the Norwegian Embassy in Bangkok (2008–2014), the Diplomatic Mission in Yangon (2012–2013), and the Norwegian Embassy in Yangon (2013–2017). The annual plans contain a short annual report, as well as the plans for the coming year.
- › **The annual allocation letters, “tildelingsskriv”,** to the Embassy in Bangkok (2008–2014), the Diplomatic Mission in Yangon (2012–2013) and the Embassy in Yangon (2013–2017). The MFA uses the annual allocation letters to comment both on last year’s annual reports and on the plans for the coming year.

Other data extracted from government databases include financial figures from ministries’ and Norad databases, including data on funding to various actors and to different development sectors. In addition, the team has reviewed the State Budgets from 2008 to 2017, with special attention paid to links between the annual reports on PCD, included as attachments to the State Budgets from 2011, and the allocation of funds to development related sectors in the budgets.

2.4. LIMITATIONS

The main limitation to this evaluation has been a lack of empirical documentation of decisions and processes underlying the MFA's and other government actors' efforts to ensure PCD. While there is a vast amount of documentation on the "pressure side" reflecting the activities of external actors, particularly civil society actors, the documentation of internal processes and decisions related to PCD within and between government ministries is scarce. To compensate for this fact, interviews with key informants within the MFA having been involved in government initiatives for ensuring PCD have played a key role in the evaluation.

The lack of empirical documentation found in the reviewed documents and archives has also limited the possibility to employ more rigorous methodologies for the evaluation, including the more formalized techniques of Process Tracing. To compensate for this, the evaluation team has actively focused on triangulating information in interviews with different respondents, i.e. testing empirical data from several independent sources, and on using the analytical model developed for the purpose of this evaluation (Figure 1, p.18) as a framework for categorizing and comparing different data sources with a clear focus.

It should also be mentioned that the selection of just one single case study prevents us from producing globally representative findings. However, the main purpose of selecting a country for study in this evaluation was to gain insight into how the overall initiatives and "system" of ensuring Norwegian PCD has played out in a developing country setting, not to establish generalizable conclusions about PCD in developing countries.

Lastly, it should be mentioned that PCD may include an infinite number of policy areas and actors, and that this evaluation does not intend to cover all of them. Furthermore, when it comes to identifying mechanisms for ensuring PCD, it is also difficult to distinguish between mechanisms that have been established for the sole purpose of ensuring PCD and mechanisms that have been established in order to address imperfections in certain sectors, such as child labor, but which might influence PCD in general.

3. Actors, dilemmas and initiatives related to Norwegian PCD

This part of the report presents the findings from the overall evaluation of Norwegian efforts to ensure Policy Coherence for Development (PCD), with main focus on the period 2008 to the present. Section 3.1 provides an overview of the main stakeholders related to Norwegian PCD. Section 3.2 discusses the main dilemmas related to Norwegian PCD. Section 3.3 presents the initiatives and mechanisms introduced to ensure Norwegian PCD in the period 2008–present, and the relationships between them. This section is organized according to the analytical model outlined in Figure 1. The last section in this part compares the efforts to ensure Norwegian PCD with international best practices.

3.1. ACTORS INFLUENCING NORWEGIAN PCD

The wide range of stakeholders in relation to Norwegian policy coherence for development can be divided in five main groups: 1) MFA and other government ministries and units; 2) CSOs and political parties; 3) Private- and government-owned companies; 4) Government funding institutions; and 5) International organizations.

3.1.1. Government actors

The current Norwegian government (a coalition of the Conservative Party and Progress Party) included policy coherence for development in its political platform when taking office in 2013. It declared that it would: *“Pursue an integrated development policy, in which measures within the various sectors point in the same direction to the greatest possible degree”* (The Sundvolden Declaration 2013, p.7).⁹ This shows a political commitment to PCD. The commitment has also been reiterated in several white papers since then, latest one on development policy “Common Responsibility for Common Future” (Report to the Storting, 25 (2016–2017)). Since the launch of Agenda 2030 and the Sustainable Development Goals (SDGs), Prime Minister Erna Solberg has made them an overarching priority in Norwegian policymaking. Policy coherence for sustainable development is seen as key in achieving the Sustainable Development Goals.

⁹ https://www.regjeringen.no/contentassets/a93b067d9b604c5a82bd3b5590096f74/politisk_platform_eng.pdf

A range of ministries are involved in integrating policy coherence for development into their policies. The most relevant of these are the Ministries of Finance, Petroleum and Energy, Climate and Environment, Trade, Industry and Fisheries, Defense, and Agriculture and Food. All of them have policy responsibilities that are directly related to policy coherence for development. The Ministry of Finance is responsible for the administration of the Government Pension Fund Global and has the main responsibility for developing the national reporting on Norway’s implementation of the SDGs. The Ministry of Climate and Environment has the main responsibility for ensuring integrated climate and environmental policies, such as, for example, Norway’s International Climate and Forest Initiative (NICFI), and the responsibility was transferred from the MFA to the Ministry of Climate and Environment in 2014.¹⁰ The Ministry of Trade, Industry and Fisheries has several areas of responsibility linked to PCD, such as the Export Credit

¹⁰ Prop. 23 S (2016–2017) Proposisjon til Stortinget (forslag til stortingsvedtak) Endringer i statsbudsjettet 2016 under Utanriksdepartementet.

Norway and The Norwegian Export Guarantee Agency (GIEK) and coordinates the “Team Norway” effort.¹¹ The Ministry of Petroleum and Energy is responsible for an integrated and coordinated energy policy, including carbon capture and storage. The Ministry of Agriculture and Food is responsible for import tariffs for agricultural products, and the Ministry of Defense for implementing international operations and missions.

All these ministries have a so-called “sectoral responsibility”, which means that no ministry has any authority over another within its field of responsibility. Although the Norwegian Constitution does not say anything about the sectoral responsibilities principle (Smith 2015) it nonetheless has a very strong standing. The notion of the sectoral responsibility system can be seen as hindering initiatives of coherence and cooperation. Any initiatives that could be perceived as limiting a minister’s authority within his or her area (Difi 2014) and hence reduce his or her administrative and political power will meet with staunch resistance. Norway’s strict division of

11 «Team Norway» consists of a wide range of public and private organizations including: the Ministry of Trade, Industry and Fisheries, the MFA, the Ministry of Petroleum and Energy, the Norwegian Export Guarantee Agency, Norwegian Research Council, Export Credit Norway, Innovation Norway (IN), Norwegian Renewable Energy Partners (INTPOW), Norwegian Oil and Gas Partners (INTSOK), Norad, Nordfund, and a range of private and CSO organizations.

responsibility between ministries made cooperation and inter-ministerial cooperation challenging (Difi 2016, 2017), and not only with regards to PCD. Several of our interviewees point to the relative “independence” of different ministries (and also sometimes departments) as one of the main challenges in achieving policy coherence (for development). “Everything that requires cooperation across ministries is a huge challenge – politicians and bureaucrats are almost exclusively concerned with their own responsibilities” (interview with government officials).

In terms of the co-ordination of policy coherence for development within the Government offices, the Norwegian Ministry of Foreign Affairs (MFA) acts as the main conduit for inter-ministerial co-ordination and should manage conflicts of interest between its development policy and its other policies (OECD-DAC, 2013 p.26). Within the MFA, the Department for Economic Relations and Development is the main responsible unit for issues related to PCD; within the Department, the Section for Development Policy is the lead agent. However, following the Sectoral Responsibility principle, the Ministry and its Department for Economic Relations and Development have not been provided with any formal power to direct other ministries’

policies with respect to ensuring PCD. Instead of leading to more MFA authority over policy co-ordination, globalization has led a number of ministries to develop their own priorities and focus areas for international engagement and cooperation within their own sector – without much coordination across ministries. This was confirmed to the evaluation team by key respondents in the evaluation.

Besides the Section for Development Policy, all sections in the MFA’s Department for Economic Relations and Development have important areas of responsibility relating directly to PCD. The sections for Business Relations and Private Sector Development; Energy and Climate; Trade Policy and Economic Analysis; Multilateral and Development Banks; and the Secretariat to the Norwegian Contact Point for the OECD guidelines all have important roles in the implementation of Norwegian PCD. At the same time, they have clear policy objectives that go beyond and sometimes in contradiction with PCD. One example of this is the Section for Business Relations and Private Sector Development whose main responsibility is to promote Norwegian business and trade abroad. In addition to the Department for Economic Relations and Development, there are other units and departments in the MFA that also hold important roles

in relation to PCD, The Department for Regional Affairs, the Department of UN and Humanitarian Affairs and the Department of Security Policy and the High North all have sections whose work is of high relevance for PCD. The Department of Regional Affairs is, for example, responsible for *“ensuring that Norwegian international development policy is designed to promote the achievement of the UN Millennium Development Goals and is in keeping with the Norwegian Government’s priorities. It is also responsible for following up Norwegian interests in regions outside Europe and North America and for developing a more coherent Norwegian foreign policy in these regions”*.¹² However, as with the sections in the Department for Economic Relations and Development, these departments sometimes have policy objectives that might be seen as contradicting PCD.

3.1.2. Civil society organizations and political parties

Norwegian CSOs within the development sphere are important stakeholders within policy coherence for development. Many of these organizations have played an important role as drivers for policy coherence for

¹² <https://www.regjeringen.no/en/dep/ud/organisation/departments/id860/> (visited 19th December 2017, revisited 22nd February 2018).

development on the Norwegian political agenda. They have acted as senders of signals, pressures and recommendations; they have been dialogue partners and resource providers; producers of analysis and knowledge; and they have raised the general awareness about policy coherence for development both within governments and in the general public. The most important CSOs in the debate about policy coherence for development in the Norwegian context have been Forum, the Norwegian Church Aid and the RORG network, which have all produced important input towards the development of the field.¹³ Stakeholders within government have recognized the role of these CSOs, and activities within the field of policy coherence for development have benefited from government grants.

The Parliament and the opposition parties are important stakeholders and drivers behind the Norwegian efforts to promote policy coherence for development. From their position outside the government, they act as critics to the government, senders of signals and recommendations, awareness raisers, and pushers for action. In 2016, the Christian

¹³ Among others; NCA alternative policy coherence for development reports (2011, 2014 and 2016), Forums research reports (2015), RORG’s website and participations in various forums and multi stakeholder committees.

Democratic Party (KrF), supported by the majority in Parliament, launched an alternative white paper on Norwegian development policies, where a “Policy Coherence for Development Reform” was one of the most central issues (KrF, 2016).

CSOs and political parties in opposition to the government have, of course, their own agenda. They can be drivers for PCD, but may find it difficult to take part in some of the often difficult compromises that are necessary in order to achieve PCD. The lack of perceived and real ownership of processes initiated by the government may be a reason for this.

3.1.3. Private and governmental business actors

An increasingly prominent role has, in recent years, been given to the private sector and business in partnerships to promote development and achieve the SDGs (Government White Paper No. 24 (2016–2017) p.16 (English version)). Private and public market actors can contribute to development on the country level through their interaction with actors in emerging and developing economies. Norway has an active business community with a strong presence in many developing economies. Through their modes of operation and interaction with local

governments and communities these actors should be seen as important stakeholders in the work towards policy coherence for development. Among the most important private actors are Statoil, Telenor, Yara, Norsk Hydro, SN Power, and Nammo (defense equipment). In the latest white paper on development policy from the government,¹⁴ Norwegian companies (together with Norfund and Innovation Norway) are suggested to be part of a consolidated “Team Norway profile” to promote Norwegian efforts.

Private and government actors contribute to PCD through their participation in a number of initiatives taken by the Government, CSOs and state-owned companies. One example of this may be KOMpakt (the Government’s consultative body on matters relating to corporate social responsibility) or Team Norway. In addition, these actors contribute, through their efforts, to adhering to international and national codes of conduct for businesses abroad.

¹⁴ “Common Responsibility for Common Future” Report to the Storting 24 (2016–2017).

3.1.4. Government funding institutions

Norway owns important funding institutions, including the world’s largest sovereign investment fund – the Government Pension Fund Global. In addition, there are several funding institutions set up to support Norwegian business actors promoting international development, of which Norfund, Innovation Norway and The Norwegian Export Credit Guarantee Agency (GIEK) are the most important. Norfund’s mandate is to contribute to economic and social development by providing equity capital and other risk capital to sustainable businesses in poor countries.¹⁵ The Norwegian Export Guarantee Agency’s social mandate is to issue bank guarantees and other guarantees that support Norwegian exports and investments facilitating investments in developing countries. Guidelines and modes of operation for these funding institutions may contribute to PCD, but they may also hamper development in poor countries through investments in businesses and projects that contribute to local conflicts or environmental damage. Both the Government Pension Fund Global and Norfund have been criticized for using tax havens (NCA 2016; Kapoor and Zeilina 2016; EURODAD 2015). However, it is important to recognize that

¹⁵ https://www.norfund.no/om-oss/historie_2/.

these funds also make significant positive contributions to PCD. Their guidelines and ethical considerations in investment are seen as positive contributions to the establishment of sustainable development (CDI 2017, NCA 2016). One recent example is when the Government Pension Fund Global recommended removing oil and gas stocks from the Government Pension Fund Global’s benchmark index (nbim, 16th November 2017).¹⁶

3.1.5. International organizations and research environments

The Organization for Economic Cooperation and Development (OECD), and, in particular, its Development Assistance Committee (DAC), is an international reference point for enhancing policy coherence for development for its 35 members¹⁷ and the European Commission.¹⁸ The responsibility for issues related to policy coherence for development is placed with the Secretary General, thus indicating that policy coherence for development spans all of OECD’s areas of work. OECD-DAC is an important driver for policy coherence for development in that it provides guidelines and self-assessment toolkits developed to design, implement

¹⁶ <https://www.nbim.no/no/apenhet/nyheter/2017/norges-bank-anbefaler-a-ta-oljeaksjer-ut-av-referanseindeksen-for-statens-pensjonsfond-utland/>.

¹⁷ <http://www.oecd.org/about/membersandpartners/>.

¹⁸ The Commission has ‘Enhanced Observer’ status.

and track progress on PCD and best practices and is responsible for conducting peer reviews of all its member states. OECD–DAC can be seen as providing important signals and recommendations to governments in their efforts to secure policy coherence.

When the United Nations (UN) and Agenda 2030 made policy coherence for sustainable development a separate target under goal 17 in the 2030 Agenda, it became an important actor in promoting policy coherence for development. Policy coherence is now an integrated part of the work with all SDGs, and increased focus on SDGs will mean an increased focus on policy coherence for (sustainable) development.

Norway channels substantial financing for development projects through other multinational organizations, such as the International Monetary Fund (IMF), the World Bank (WB), UN agencies and others. Through these organizations' implementation of projects in developing countries, they have an indirect influence on Norwegian PCD. These organizations report back to donors through yearly reports, although often without specific detail on single donor countries, and without specific reporting on issues of policy coherence or incoherence. Despite an increased focus on reporting

from the Norwegian funding agencies, it is difficult to say precisely what the role of these organizations is to secure Norwegian PCD.

Several research environments have specialized in development research, including PCD. Among the leading research institutions is the Center for Global Development (CGD) which produces the Commitment to Development Index (CDI). This index rates 27 of the world's richest countries on their dedication to policies that benefit people living in poorer nations. The Index is widely used as a measure of PCD despite the fact that some countries (including Norway) have been critical of the way the index measures contributions to global emissions and trade. The European Center for Development Policy Management (ecdpm) is another leading research environment related to PCD. The center is funded mainly by European governments.

3.1.6. Actors' commitment to and understanding of PCD

The need for an overarching and specific commitment to PCD is recognized by both the OECD and the EU, as well as in other evaluations of PCD (ecdpm 2013). In order to be able to secure policy coherence for development, there must be a long-term focus on achieving coherence, a clear understanding

of what the commitment entails, and preferably concrete operationalization of the commitment. The current Norwegian government committed to PCD in their political platform (Sundvolden Declaration 2013), and has restated this commitment in the last government white paper on development (MFA, 2017). It is important to sustain the political interest, will, and support for PCD. Several of the respondents have commented that the political priority of PCD is not sufficiently high; hence the goal of PCD loses in competition with other policy goals. One respondent put it this way: *“When we were trying to argue for policy coherence for development with, for instance, the Ministry of Climate and Environment, they might see the relevance of particular projects such as Norway’s International Climate and Forest Initiative (NICFI), but a more overarching approach was seen as very difficult and even “meaningless”.*

In analyzing reports, statements and interviews with a wide range of respondents, it is clear that there are many different understandings of what PCD entails. Some respondents would emphasize the need for internal coherence in the Norwegian development policy, others would talk about the need for a coherent Norwegian policy (for instance in Myanmar). This illustrates that there are clear dilemmas related to the sustained commitment

to PCD at the political level, but also to the understanding and shared ownership of both the concept of PCD and the PCD policy commitment in place beyond those mandated to promote it.

Beyond the MFA, (and sometimes even within different departments in the MFA) it is also important to strive to make PCD commitments meaningful at a national level. There is a recurring perception among several of the respondents in the project that the interest for, and understanding of, the concept of policy coherence for development is relatively limited.

3.2. DILEMMAS

Policy coherence for development adheres to a notion that, as far as possible, policy areas should work together to contribute to a more sustainable global development. On an overarching level, a clear and unambiguous political commitment is important (OECD,¹⁹ ecdpm 2013), and a common understanding of what development is and how it can be achieved is necessary in order to achieve PCD. On a policy level, dilemmas and conflicts emerging between national interests and development interests should be clearly described, in order to increase

¹⁹ <http://www.oecd.org/pcd/pcsd-framework-generic-module-institutional-framework.htm>.

awareness of these conflicts and facilitate improved prioritizing and choices. At its core, this is about identifying and dealing with opposing interests between the goals of the government within different policy areas, and the global goals to secure a sustainable development and foster respect for human rights and developing countries, as well as for poor peoples' perspectives on development.

Based on interviews with respondents (see list of perceived dilemmas and challenges, Appendix 6), previous reports from researchers (CDI 2017, ecdpm 2013), CSOs (NCA, 2011, 2014, 2016; Forum 2015) and international organizations (European commission 2015, OECD, 2008), two main types of dilemmas have been identified:

1. Dilemmas related to conflict between development policy objectives and other policy objectives.
2. Dilemmas concerning how to reach development policy objectives.

3.2.1 Dilemmas related to conflict between development policy objectives and other policy objectives

To what extent do national policy goals contribute to or hamper development in poor countries, and what are the main challenges and dilemmas related to other policy objectives? These issues have been discussed in general and specifically pertaining to the Norwegian context in reports from Norwegian CSOs (NCA, 2011, 2014, 2016; Forum/FNI 2015), international researchers (CDI 2017), international organizations (EU, 2015;²⁰ OECD, 2013a) and other governments in relation to their own reporting on policy coherence (Swedish government 2015).²¹

Based on the identification of dilemmas and challenges in the reports referred to above, and over 40 dilemmas introduced to the evaluation team through interviews with respondents both in Norway and Myanmar (see Appendix 5), some important dilemmas emerge. Four main policy areas stand out as important across all sources, namely finance, trade, environment and security. Looking at Norwegian performance on PCD within these categories, we find that both Norwegian CSOs

²⁰ Policy Coherence for Development 2015 EU Report (EU commission).

²¹ «Politiken för global utveckling i genomförandet av Agenda 2030» (Swedish government White paper 2015/16:182).

(NCA and Forum) and the CDI indicate that Norway has relatively good performance on finance (Norway is rated in third place in the CDI index and NCA find Norwegian performance within their indications on finance as relatively good). On the other hand, CDI²² and NCA find that there are persisting challenges in the areas of trade, environment and security. The interview respondents identified the same policy areas to contain the most persisting challenges. Taking into consideration Norwegian performance over time, and based both on NCAs reporting on PCD and in the CDI, we find that Norway has made little or no progress within trade and environment over time. With regards to security, there is more fluctuation in the evaluation of Norwegian performance over time.

²² **On the CDI index** – some observers have been critical of the development of the CDI index, and see it as unfair for countries such as Norway that have an energy production. The index measures fossil fuel production per capita as an approximation to Norway's contribution to global emissions. Thus, the methodology differs from the conventional way of measuring emissions from fossil fuel energy consumption. How fair the CDI measures of Norwegian GHG emissions are, and thus how fair Norway's contribution to global climate change is, is questionable. The CDI methodology is not in line with the reporting requirements under the United Nations Framework Convention on Climate Change (UNFCCC), and thus runs counter to the main credo of Norwegian climate policy: to reduce emissions by pricing carbon through taxes and/or emissions trading. (Norway has generally argued that it is not cost-efficient to target the production of energy with policy measures). The low CDI score on trade is due to the high tariffs on imported agricultural products – critics of the index have claimed that the fact that Norway imports most of its food from the EU and only about 10% from developing countries needs to be taken into consideration, and that it thus is unfair that we “lose” points on this indicator. At the same time, Norway has implemented a system of general trade preferences (GSP). These systems have been criticized by CSOs for being implemented arbitrarily, and it has been claimed that there is room for changing the preferences if it is seen as a threat to the Norwegian agriculture (an example is the import of mutton from Botswana).

Finally, we have taken into consideration the perceived ability of different sectors to solve dilemmas. Some of the dilemmas can be solved through the coordination of policies and skillful trade-offs in priorities within policy development and implementation, whereas other dilemmas are far more challenging to deal with. This is particularly true in the cases where the dilemmas are characterized by high levels of conflict and difficult, if not impossible, trade-offs. Such situations occur when national sector interests are in opposition to global development objectives and the assumed domestic costs of a given policy change are high and immediate. We find that dilemmas within the sectors of trade, environment and security represent dilemmas where national interests and global development interests are at odds.

A brief presentation of some of the most important PCD dilemmas within the policy areas of trade, environment and security is given below.

Trade

Trade rules represent an area where many view the interests of the poor developing countries as being directly in conflict with national interests. The dilemma is how to balance nationally important policy objectives, such

as sustaining Norwegian domestic markets, with policy objectives that seek to facilitate economic activity and growth in developing countries. One respondent put it this way: *“National interests related to trade and agriculture are almost impossible to challenge.”*

In order to be able to sustain Norwegian competence and markets, powerful interest groups see strict restrictions on service providers from other countries as a key to defending their interests and representing their constituencies. Likewise, the view that Norway has to protect national farming and demographic concerns (sustaining a decentralized settlement pattern and rural populations) through a high share of agricultural subsidies to Norwegian farmers is firmly bestowed in both government and other powerful interest groups. The power to define and establish the development friendly trade rules, subsidies and import tariffs lies beyond the responsibility of the MFA. Other important ministries are strongly involved in the work with these policies, such as the Ministry of Commerce, Trade and Fisheries, the Ministry of Agriculture and Food, and ultimately Parliament. Any policy change within these issues will thus require a high degree of interest alignment and coordination between different government agencies and interest groups, in addition to

some difficult, “costly”, and hard to imagine sacrifices on behalf of the core interests of strong groups such as the trade unions, the agricultural associations and political parties representing farmers and workers. In all likelihood, this renders policy change non-viable due to the political nature of the dilemma and its alignment with core political interests in the Norwegian national context.

On the other hand, many advocates of import restrictions on agricultural products will argue that production and consumption of locally produced food is a premise for sustainable development, and hence challenges the premise of free trade as a prerequisite for development (see paragraph 3.2.2).

Climate and environment

Despite Norway’s commitment to the Paris Agreement and other climate initiatives, Norway is an important fossil fuel producer. The dilemma between the perceived need to secure government incomes, protect and sustain important Norwegian industries (oil and gas, shipping, transportation (air)), technologies and settlement patterns, and the need for transition to a more sustainable and low-carbon-use society is important and profound. Another dilemma is between the government’s policy to secure high oil prices and the policy to promote

development in countries often dependent on buying oil on the global market. Many see these dilemmas as related to core interests in Norwegian society (employment, incomes etc.). Furthermore, the power to define and implement policy changes more often than not reaches beyond the responsibility of the MFA, and coordination and cooperation with other ministries and government offices such as the Ministry of Petroleum and Energy, the Ministry of Climate and Environment, the Ministry of Commerce, Trade and Fisheries, and ultimately Parliament, is required.

Dilemmas between the continued production of fossil fuels and a sustainable development is both political and economic in nature, and reaches deep into core national interests. It also has a generational aspect to it that development must be seen in the light of development, both now and for future generations.

Security

Reducing insecurity and conflict in fragile and poor states is imperative for development. There can be no sustainable development without peace and security, and peace and security will not be sustainable without development. However, engagement in fragile states can illustrate tensions between foreign

and development policy objectives and possible competing interests. This becomes particularly visible “on the ground” when policies and projects are implemented. Promotions of peace and security may, in some instances, go against promotion of universal human rights. Dilemmas of security versus human rights are related to Norway’s role as a good ally, as a protector of its own weapon industry, and as a promoter of stricter regulations of arms exports. It is partly an economic, but mostly a political, issue.

Some respondents highlighted the Norwegian engagement in Afghanistan and its membership in the NATO-led alliance vs. the neutrality of development and humanitarian actors and efforts as an example of a security-human rights dilemma. The political priorities of contributing to joint missions often led by important allies (the US and NATO) may lead to less focus on development in countries of lesser strategic importance. Such dilemmas may involve several policy areas and require cooperation across several ministries.

Even though Norway has limited arms exports to poor and undemocratic countries, the lack of requirements for end-user certificates represents a loophole in the current system. Introducing a system of end-user certificates in Norwegian exports may benefit development.

Still, this may be in contradiction with the interests of other NATO members, where some claim that requirements for end-user certificates will undermine trust among NATO members and be detrimental to the interests of Norwegian weapons exporters. One dilemma mentioned by respondents was the export of weapons to UAE and their role in the war in Yemen vs. Norway's humanitarian engagement in the country.²³

3.2.2 Dilemmas concerning how to reach development policy objectives

Many of the interviewed respondents pointed to the fact that difference in perceptions of development as a concept is a fundamental source of dilemmas, and hence that development policies in themselves involved dilemmas. Such dilemmas include both dilemmas related to different priorities of development and those related to different strategies for how to reach development goals.

Dilemmas related to different prioritizations of development objectives are well known from the Development literature,²⁴ and are also being debated in connection to the new global goals for sustainable development (SDGs).

²³ As of early January 2018 exports were stopped by Parliament after pressure from CSOs and the media.

²⁴ See, e.g. WCDE (1987); Hueting (1990); Stiglitz, Sen and Fitoussi (2008); and ICSU, ISSC (2015).

Perhaps the two most potentially conflicting goals in this respect are between economic growth and the environment, and between overall economic growth and social equality. Another dimension of the economic growth-environment dilemma is connected to scale, i.e. a dilemma of supporting economic growth at the national scale and thereby potentially contributing to increased emissions and depletion of natural resources, causing global and longer-term negative environmental effects. Although significant measures have been taken to reduce the negative environmental effects of industrial development and economic growth over time, including measures in the name of ensuring PCD, there is still no “decoupling” between the two processes.

There are also different and potentially conflicting perceptions of how to achieve development. One such dilemma has already been mentioned in relation to import restrictions on agricultural produce and the protection of the national agricultural sector. Advocates for this policy might argue that production and consumption of local agricultural produce promotes sustainable development at the global scale, while it obviously might constrain the possibilities for economic growth in other countries, including countries in which Norway supports agricultural development.

Another classic dilemma related to conflicting perceptions of the way towards development is the strategy of primarily promoting overall economic activity and growth in a country (“trickle down”) vs. a strategy of directly supporting the poorer segments of society.

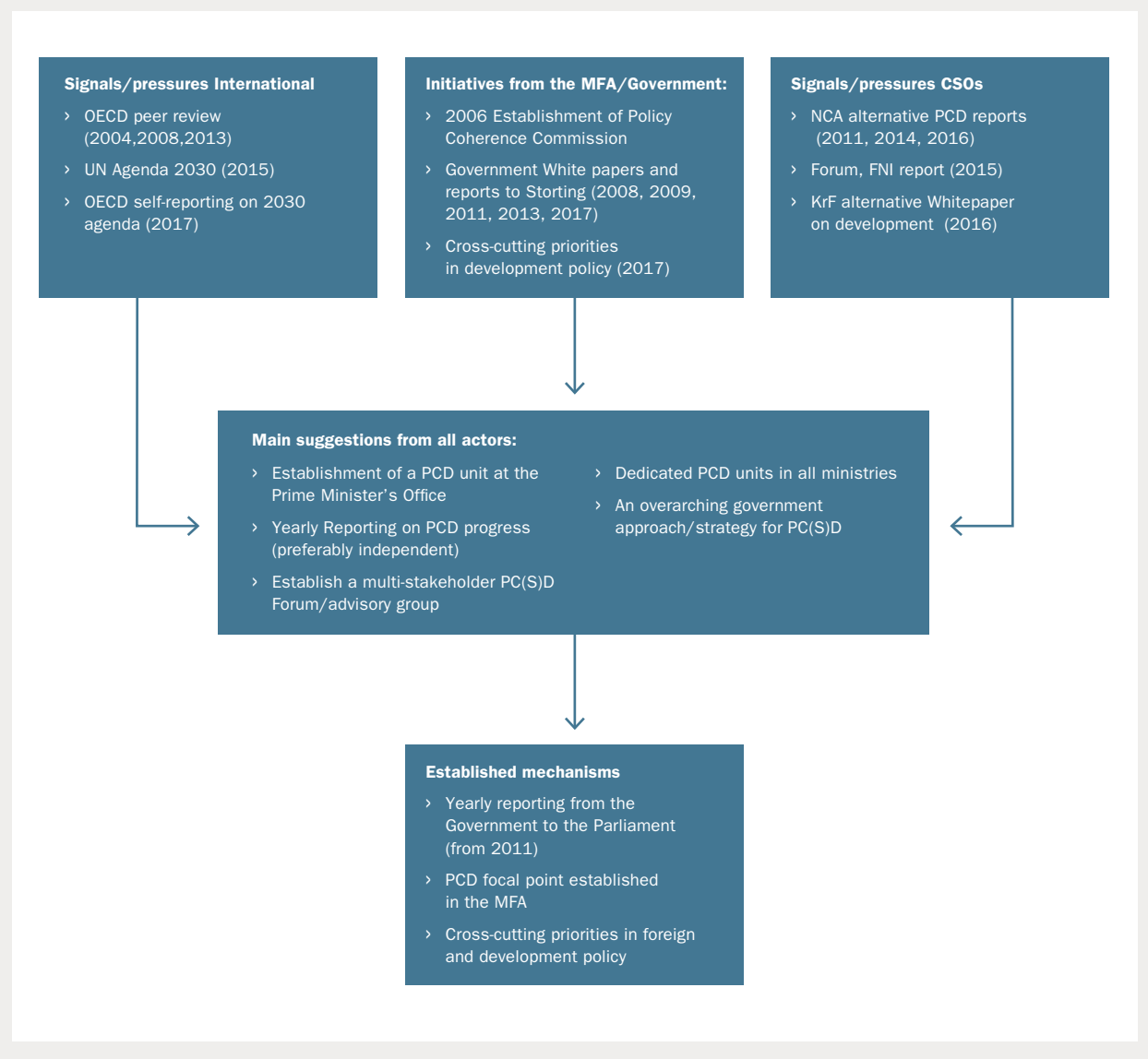
3.3. INITIATIVES AND MECHANISMS FOR ENSURING PCD

When dilemmas are brought forth either by civil society, media, researchers, the private sector, international organizations or the government itself, these serve as signals of incoherence. In this section we present the different ways these signals of incoherence have been and are addressed by the MFA and other government units, and discusses possible reasons for why some initiatives for ensuring PCD are taken forward while others are not. Figure 2, next page, summarizes the main sources of pressure, the initiatives proposed by various actors, and the mechanisms finally established for ensuring PCD. The figure is based on the analytical model presented in section 2.2 (figure 1), and more details about the process are provided in Appendices 4 and 5.

3.3.1. Pressure and proposed mechanisms

Since policy coherence for development was first introduced in the Norwegian context through the 2003 government white paper

FIGURE 2 // THE RELATIONSHIPS BETWEEN PRESSURES FOR PROMOTING PCD AND MECHANISMS ESTABLISHED TO ENSURING PCD



“Fighting Poverty Together – A Coherent Policy for Development” (MFA 2003), several signals of incoherencies have been voiced and initiatives taken from different actors to promote policy coherence for development in the Norwegian context. These signals/pressures and initiatives can roughly be categorized as:

- > Signals/pressures from international organizations
- > Signals/pressures from CSOs and reports
- > Initiatives from government and the MFA

We find that most dilemmas in policy coherence for development are first picked up by international or CSO actors (actors outside of government). These actors then formulate signals and pressures through reports and recommendations. Despite the lack of concrete documentation, it is clear from interviews with government officials that such incoherencies and dilemmas are also discussed within government, across and within ministries, through a form of inter-ministerial diplomacy. Still, the explicit initiatives and mechanisms to handle them are often initially recommended by outside actors.

BOX 1 // THE ACTORS' MAIN RECOMMENDATIONS FOR ENSURING PCD

- › Establishment of a PCD unit at the Prime Minister's Office
- › Yearly Reporting on PCD progress (preferably independent)
- › Establishment of a multi-stakeholder PC(S)D Forum / advisory group
- › Dedicated PCD units in all ministries
- › An overarching "government-wide" approach/strategy for PC(S)D

Most of the signals/pressures and initiatives have issued concrete recommendations and suggestions on how to strengthen PCD in the Norwegian context. Over the near ten-year timespan included in this evaluation, many of the same recommendations have been made from different actors outside the government (see Figure 2, Appendices 5 and 6, and Box 1), yet only a few of them have been picked up by the government and initiated as mechanisms (see next paragraph).

3.3.2. Responses and established mechanisms

A limited number of mechanisms have been specifically established to ensure PCD. Through document analysis and interviews with key informants, we have identified only three

mechanisms that have been established more or less directly to promote PCD at an overall level. The mechanism most directly established to promote PCD is the annual reporting on PCD from the government to Parliament. The two other mechanisms introduced to promote PCD, although in a more indirect way, are the establishment of the Department for Economic Relations and Development within the MFA²⁵ and a focal point for PCD within this department (see paragraph 3.1.1), and the establishment of cross-cutting priorities in Norwegian foreign policy.

In addition, we have identified several mechanisms that can be said to indirectly promote policy coherence for development, but PCD was not explicitly part of their mandate when they were established. These include among others: KOMpakt, OECD focal point, Strategic framework for Norwegian efforts in fragile states and regions (MFA 2017)) (See Appendices 4 and 5 for a chronological presentation on Norwegian PCD).

The main monitoring and reporting mechanism for Norwegian PCD is the annual report to

25 This unit was not established for the purpose of having responsibility for PCD as such, but the rationale behind the establishment was to integrate the MFA's work on promoting Norwegian international business with its work on global economy, trade, energy, climate and development (Prop. 1 S, (2014–2015) Utenriksdepartementet (UD)).

Parliament. This reporting mechanism was introduced in 2011 and has been followed up in a dedicated chapter in the budget proposal from the government to Parliament. The work of developing the reports has been led by a dedicated official within the MFA's Department for Economy and Development. The reports depend on input from other line ministers, and the general procedure is that the topic of the report is suggested by a working team in the MFA and approved by the Foreign- or Development Minister. Subsequently, a draft is presented and is sent to different line ministries in the early stages of the reporting to comment on the report.

The procedures followed to produce the report, as well as the contents of the report, have been criticized by CSOs and others for not being transparent with respect to dilemmas and challenges, and for not providing clear recommendations for improving PCD. The set-up of the report and the reporting procedures were also deemed by many interviewed respondents, both within and outside the government, as inadequate with respect to providing structured and accountable evidence for improving PCD. On this background, most critics have advocated for an external actor to be responsible for the reporting.

The format of the annual PCD reports as part of the yearly budget proposal to Parliament imposes important limitations on how the report is structured and what issues can be presented. Some respondents also pointed at the organizational structure of sectoral responsibility of the ministries (see paragraph 3.1.1) as a key factor behind the “unsystematic” format of the report. It is important for the government to report on good performance in these reports, and not to undermine the efforts of the sitting government.

Although Norway does a considerable amount on both the international and the national levels to ensure PCD, the format makes it almost impossible for the reports to raise real dilemmas and contradictions in Norwegian policies and to be critical of policy development. The fact that the report has been about different focus areas every year also makes it difficult to see the report as tracking progress on any particular aspect of PCD. Several key informants emphasized that the fact that the reporting is a joint effort between different ministries also makes it difficult to raise incoherencies, due to the fact that each ministry needs to report in a favorable manner within such a format. The fact that the MFA does not have a clear mandate to coordinate efforts of PCD also makes it difficult, if not

impossible, to “force” other ministries to report on potential dilemmas and incoherencies.

In addition to the mechanisms presented above, and which were directly or indirectly established for promoting PCD, there are several processes of policy development and policy implementation that can be seen as relevant to secure PCD:

Inter-ministerial and multi-actor advisory groups, working groups, consultative bodies and committees, whether they are initiated at governmental or ministerial level, are tools to secure policy coherence, and the aim is often to create common understandings about a given topic/policy area. Examples of such groups or committees include: the Policy Coherence Committee (2008), the consultative body on matters of multilateral trade issues (WTO committee), KOMpakt (the Government’s consultative body on matters relating to CSR Action plans), and the inter-ministerial working group to evaluate experiences and possible improvements in the Generalized Scheme of Preferences (GSP) Regulations (2012).²⁶

²⁶ The groups had representatives from the MFA, the Ministry of Trade, Industry and Fisheries, the Ministry of Finance, Ministry of Local Government and Modernization, the Ministry of Agriculture and Food, Norad, Norwegian Customs, and the Norwegian Agriculture Agency.
https://www.regjeringen.no/globalassets/upload/ud/vedlegg/handelspolitikk/wto20generelt/import_fra_utviklingsland_webny.pdf.

Government White papers may pertain to several policy areas, the responsible ministry may consult with other involved ministries in the process of writing the paper on both the political and administrative levels. The content of the white papers influences policies both through general visions and more concrete priorities and efforts. Some examples of these White papers are: NOU 2008: 14 “*Coherent for Development?*”, Report No. 13 to the Storting (2008–2009) “*Climate, conflict and Capital*”, NOU 2009:19 “*Tax havens and development*”, Report No. 10 to the Storting (2008–2009) “*Corporate social responsibility in a Global Economy*”, Report No. 14 to the Storting (2010–2011) “*Towards Greener Development*”, NOU 2016:8 “*A good ally – Norway in Afghanistan 2001–2014*”, Report No. 25 to the Storting (2012–2013) “*Sharing for prosperity*”, Report No. 24 to the Storting (2016–2017) “*Common Responsibility for Common Future*”.

Other processes to secure PCD can be seen in the development of *frameworks and guidelines* across ministries and departments. Some examples of this can be the Strategic Framework for Norwegian Efforts in Fragile States (MFA 2017); Ethical guidelines for the management of the Government Pension Fund Global; Ethical guidelines for contact with business and industry in the defense

sector (Ministry of Defense 2011) and the Ethical guidelines for the management of the Government Pension Fund Global (Council on Ethics 2017).²⁷

Beyond committees, working groups, frameworks and guidelines, *action plans* may also be seen as tools to secure PCD. Some of these action plans are cooperation between ministries and clearly state that intra-ministerial cooperation is needed to fulfill the action plans. Examples of such action plans are “Business and Human Rights – National action plan for the implementation of the UN Guiding Principles” (MFA 2015), “National Action plan on women, peace and security 2015–2018” (MFA 2015), “Freedom, power and opportunities – Action plan for women’s rights and equality in foreign and development policy 2016–2020” (MFA 2016), “Food Security in a climate perspective – strategy 2013–2015” (MFA 2012). In line with the abovementioned initiatives, there are cross-cutting issues for all Norwegian development policy and aid, emphasizing human rights; women’s rights and gender equality; climate change and environment; and anti-corruption. All development efforts are to be assessed

²⁷ https://etikkradet.no/files/2017/04/Etikkradet_Guidelines_eng_2017_web.pdf.

on the basis of how they affect or are affected by these cross-cutting issues (MFA 2017).

3.3.3. Obstacles to establishing mechanisms and ensuring PCD

Despite a number of mechanisms and initiatives brought forward to promote PCD by different actors over the years, many of these have never been implemented. Two of the main recommendations given in the report from the Policy Coherence Commission in 2008 was to establish a “government-wide” approach to PCD, and to establish a central PCD unit at the Prime Minister’s Office. None of these recommendations were implemented.

The relative independence of different ministries (the principle of sectoral responsibilities) in the Norwegian government and bureaucracy was the most common explanation given by key respondents for a “government-wide” approach to PCD not being implemented. Another common argument was the possible loss of flexibility through imposing coordination by one unit across all ministries. These arguments were continuously used by several respondents to argue against a “government-wide” approach and to justify why this approach and a central (inter-ministerial) PCD unit would most likely “not work in the Norwegian context”. The main obstacle to

taking this recommendation further was the structural context of Norwegian government, and a perception of the value of flexibility vs. more institutional and rigid systems of reporting and responsibility.

The idea of establishing a PCD unit at the Prime Minister’s Office was also seen as difficult by several respondents based on the strong notion of sectoral responsibilities. Taking the responsibility away from a ministry is seen as difficult for that particular ministry, while at the same time it makes the Prime Minister responsible for policy areas that “belong” to line ministries. Establishment of a unit at the PM’s Office that can instruct other ministries has not previously been tested, and is seen as requiring a large-scale reform. It has been advocated that a Public Security Unit should be established at the PM’s Office, but even in such a high-profile policy area, the responsibility to monitor other ministries’ efforts in public security (“samfunnssikkerhet og beredskap”) still sits with the Ministry of Justice and Public Security (JD 2012).

The recommendation to establish a multi-stakeholder PC(S)D forum or advisory group will, according to a key respondent, most likely be initiated. The process of preparing a mandate for such a forum is currently (December 2017)

ongoing in the MFA. The establishment of such a forum was recommended by the government's latest white paper on development (MFA 2017).

MFA's lack of formal power (hierarchical mechanisms) to interfere in other ministries' policy decisions, and the deep-rooted notion of sectoral responsibilities (Lægreid mfl. 2013), was mentioned by many respondents as a key obstacle of establishing mechanisms and ensuring PCD in general. According to key respondents interviewed, there is no "culture" within the government of interfering in other ministries' policies and decisions beyond informal discussions and cooperation and consultations in inter-ministerial working groups and committees. Several of the respondents in the evaluation highlighted the structure of Norwegian government institutions as one of the most important challenges with regards to handling dilemmas of PCD within and between different policy areas. The relative independence of different ministries and the lack of institutionalized arenas for cooperation between ministries make policy coherence for development challenging. Two respondents described the structure of Norwegian government as "siloified", indicating that each and every ministry works in their own sphere, with little interaction with other ministries about policy development and implementation.

This echoes what previous evaluations of coherence in Norway have shown (Difi, 2011, 2014, 2017).

Consequently, the MFA relies heavily on informal mechanisms to handle emerging dilemmas and promoting PCD. Formal and informal consultations (discussions) with relevant ministries and other stakeholders on a case-by-case basis are the main mechanism, and a balance of interests, with limited sacrifices by any stakeholder, is a typical outcome rather than initiation of concrete measures to ensure PCD. The main constraint to effectively handle dilemmas is perceived by many of the respondents to be the horizontal organizational structure of Norwegian ministries and the limited operational space for the MFA (or other ministries) to direct other line ministries within this structure.

Furthermore, the Ministry has limited power to direct business actors in their work towards ensuring PCD. Such power is stronger among other ministries, such as the Ministry of Finance, the Ministry of Petroleum and Energy, and the Ministry of Trade, Industry and Fisheries. In this political context, it can be seen as a paradox that some of the most concrete mechanisms established, and those which promote PCD, have been initiated by

ministries other than the MFA, e.g. regulations of the Pensions Fund Global and guidelines for Norwegian business actors abroad.

A number of respondents also pointed to the relatively weak role of the MFA as the responsible ministry for policy coherence for development. According to one key informant, "other ministries have very clear priorities and are more used to conflict and power games than the foreign ministry". This often leads to policy coherence for development being the least prioritized goal when there are conflicting policy goals. The lack of political prioritization of PCD in these cases was also explained by key respondents as being due to the fact that "the short-term costs of ensuring PCD were clear, while the long-term benefits were unclear".

Several respondents highlighted the notion that consensus between different ministries was seen as a valuable and normatively good thing. This "drive towards consensus" can also be seen as a challenge for handling dilemmas and securing policy coherence for development because it contributes to an "inability" to describe real or potential conflicts between policy goals, and, through these descriptions, to facilitate discussion and dialogue towards a potential trade-off between goals, as well as

general awareness about policy coherence for development. One example of this is the annual reporting for PCD, where there are limited descriptions of challenges and dilemmas and more focus on what the government has already achieved.

There was also a clear notion among many of the respondents that one of the biggest strengths in Norwegian bureaucracy was its “flexibility”: being able to meet new and unexpected challenges as they arise. This flexibility was perceived by several of the respondents to be jeopardized through the introduction of “too rigid” action plans, strategies, reporting regimes and formalized mechanisms. It was perceived as a challenge that the institutionalization of policy coherence mechanisms, such as strategies, action plans, focal units and reporting regimes are seen as risking a perceived strength of the Norwegian system. However, the “flexibility” of the system was also seen by some respondents as an obstacle to ensuring PCD. The main argument behind these statements was that “flexibility” implies lack of: clearly stated policy goals; procedures for following up and reporting on the goal statements; and clear responsibilities for reaching the goals. The most critical notion expressed on the system of “flexibility” was that “it is designed for circumventing

responsibility and accountability”. On the other hand, the ability of a “flexible system” to meet new and unexpected challenges seems to make it more capable of responding to signals of incoherence after they have appeared (ex-post), i.e. securing “no harm”, rather than providing space for strategic planning and policy synergies towards PCD.

3.4. EFFORTS COMPARED TO INTERNATIONAL BEST PRACTICES

The main source of documenting and recommending best practices with respect to ensuring PCD is the OECD-DAC, through their lessons from national reviews and work in establishing guidelines for PCD. The committee provides recommendations and best practices in three separate but interrelated phases of establishing an effective system for ensuring PCD:

1. Political commitment for PCD (setting, prioritizing and articulating objectives).
2. Ensuring effective policy coordination for PCD.
3. Improving implementation, monitoring, analysis, and reporting of PCD.

In addition to the OECD reviews, best practices are documented in various evaluations and studies of country experiences, particularly within the EU. A key reference for insight into how different European countries organize their work towards ensuring PCD is a study commissioned by DANIDA and carried out by the European Center for Development Policy Management in 2013 (ecdpm 2013). In this literature, Sweden and the Netherlands are the two countries primarily referred to with respect to providing best practices of organizing work towards PCD.

3.4.1. Political commitment for PCD

OECD-DAC states that political commitment needs to be expressed at the highest levels of government and to be backed by policies, instructions and incentives that translate commitment into action. Commitment to PCD also entails working with civil society and parliaments to raise public awareness for PCD to sustain broader support.²⁸ Furthermore, the committee states that setting out a vision document is not sufficient in itself to ensure PCD, and that priority areas need to be monitored and detected incoherencies need to be responded to.

²⁸ OECD-DAC: Recommendations of the council on good institutional practices in promoting PCD, 29. April 2010 – C(2010)41.

Commitment to PCD has been expressed at the highest level of the Norwegian government through several White Papers and the Sundvollen Declaration in 2013, as well as through initiatives such as the policy coherence commission in 2008, and the annual reports on PCD attached to the State Budget. However, the follow-up of these expressions of commitment has been weak, both with respect to development of policies, instructions, incentives and clear plans to translate commitment into practices as well as to establish concrete mechanisms resulting in improved PCD. There was a widespread perception among interviewed respondents within the government, as well as among CSO representatives and others, that concrete plans and procedures for following up the very general statements of commitment were lacking, and that there was a weak political will to follow up the stated commitments in practice.

Although commitment to work for PCD has been stated in several government documents and, at the highest political level, there is no legal commitment attached to the statements. A few countries have attached legal commitments to PCD, e.g. Sweden has had a legal commitment since 2003, while Belgium has introduced PCD as one of six overarching objectives of the law on development cooperation adopted

in 2013. Other European countries, including Finland, Germany and Ireland, have stated their commitments to PCD through White Papers or Coalition Agreement, similar to Norway, but with no legal commitments.

The government, through the MFA, does support CSOs in informing, engaging and educating the public on PCD-related topics. The concept of PCD, however, is relatively unknown to the public and does not receive significant attention outside the few civil society actors engaged in the topic. Information gathered from the interviews also shows that the concept does receive little attention within government structures and is not very well understood by government actors.

Compared to some other “best practice” countries in this field, the Norwegian government has instigated few initiatives to follow up stated commitments and to make the PCD concept known within ministries. In Sweden, for instance, the government has required all ministries to develop action plans for how to follow up the national plan for global development and PCD.²⁹ This includes the development of operational goals,

²⁹ In the Swedish Government White paper “Politiken for global utveckling i genomförandet av Agenda 2013” 2015/16:182.

identifying needs for analyzes, determining which government actors need to be involved, and assessing the need for internal capacity building in the field.³⁰ A particular focus of the work and reporting on PCD in Sweden has been the willingness to illustrate dilemmas and inconsistencies between policy goals, particularly with reference to exports of war materials, capital dispersal (illicit capital flows) and global development.

3.4.2. Ensuring effective policy coordination for PCD

OECD-DAC recommends that policy coordination for PCD builds on the existing government structures in various countries. Most countries have established a central co-ordination unit to ensure PCD, typically the Government Office (equivalent to the Prime Minister’s Office in Norway). In some countries, coordination is the responsibility of ministries or agencies that have the mandate to promote consideration of development issues in the policymaking process. Many countries have also established cabinet committees or inter-ministerial committees and working groups of high-level civil servants for inter-ministerial coordination

³⁰ <http://www.concord.se/nystart-for-sveriges-politik-for-global-utveckling-handlingsplaner-under-hosten/>.

towards PCD. Some key recommendations from OECD-DAC in this respect are to:

- › Use the center of government as mandated for central coordination of PCD
- › Establish efficient processes for inter-ministerial coordination to resolve policy conflicts, while ensuring that mandates and responsibilities are clear
- › Ensure that both formal governance arrangements and informal working practices support effective communication between ministries and departments

Among European countries there are many different institutional arrangements established to ensure PCD. The Netherlands had, until 2012, a designated government department, the Department for Effectiveness and Coherence (DEAC), which was particularly established to work with PCD. The unit was tasked to conduct screening exercises of government policies and activities against PCD, proactively engage with other departments and ministries, and promote discussion on PCD issues (ecdpm 2013). Sweden, on the other hand, has a government-wide institutional arrangement, where all government departments are responsible for ensuring

that their policy area is in compliance with the government-wide responsibility for PCD. Each ministry also has to report to Parliament according to a set of goals and indicators outlined by the Department of Development Cooperation within the MFA, which has the responsibility for monitoring and policy compliance of the PCD work carried out by the separate ministries.

However, a general lesson from the studies on institutional arrangements towards ensuring PCD is that commitment, awareness of the PCD concept, and the mandates given to the responsible actors are more important than the type of organization established as such. This is also reflected in the fact that all “best practice” countries have proven to be vulnerable to loss of political momentum with respect to their work towards ensuring PCD, independent of organizational structures and the existence of mechanisms (ecdpm 2013). Hence, all PCD systems seem to depend on continuous pressure, politically or by civil society actors, to be sustainable. In this respect, Finland is the only country that formally involves CSO in their organizational arrangements towards ensuring PCD.

Norway has a “horizontal” structure of government, whereby each ministry has jurisdiction

over their own sector, and no tradition for establishing overarching units to override this structure. Hence, although proposals to establish a unit responsible for PCD at the Prime Minister’s Office have been put forward, the responsibility still lies with the MFA. Although responsibility for ensuring PCD is allocated to a specific ministry and department within the government, in accordance with the existing government structure, the unit is not equipped with a mandate or the tools to effectively carry out its task. In other words, the unit is not in a position to direct other ministries with respect to ensuring PCD. Neither can it be said that there exist efficient processes for inter-ministerial coordination to resolve policy conflicts. Rather, it was clearly stated by interview respondents that the MFA has a weak position when it comes to resolving inter-ministerial conflicts, and that balancing interests by informal means was the main outcome of such processes.

However, many respondents also highlighted the high degree of informal mechanisms of communication and coordination within the government as a particular strength of the Norwegian government’s structure, claiming that this system, beyond doubt, contributed to strong PCD in practice – also compared

to countries with rigid structures and mechanisms for ensuring PCD”.

As of late November 2017, the Norwegian government has taken an initiative to form a dialogue forum where policy coherence for development (or policy coherence for sustainable development) will be the main focus. The committee will consist of representatives from ministries, private companies, civil society and researchers. According to a key informant in the MFA, the work on preparing a mandate for this forum is currently ongoing.

3.4.3. Improving implementation, monitoring, analysis and reporting of PCD

OECD-DAC states that effective procedures and mechanisms must be in place to ensure that policies can be effectively implemented and adjusted as needed in order to maintain their coherence over time. More specifically, the committee recommends that the State Budget should be used actively as a tool to ensure PCD, and that an evidence-based approach to PCD should be adopted. Furthermore, analyzes of policy performance should take into account available evidence through reliable and impartial sources, such as academia, independent domestic and international think tanks, etc., and the

results should be published for Parliament and the wider public in a transparent and accountable manner. Independent reviews of policy performance on high priority issues with a substantial impact on development issues should also be considered.

OECD-DAC country evaluations and studies reveal that an evidence-based approach to PCD is the most neglected aspect of ensuring PCD in all assessed countries, including in Norway. This is a major bottleneck to ensuring PCD, as evidence is the basis for both awareness and attention to PCD as well as for measuring progress towards PCD. Most countries carry out ad-hoc studies and evaluations of the state of PCD, but with a varying degree of systematics. Some countries use external actors to conduct analysis, e.g. academic institutions as in Germany and Ireland. Some rely primarily on evaluation services, e.g. the Netherlands, and others base their follow-up on various forms of internal reporting systems, e.g. ministries reporting to their parliaments as in Sweden – and in Norway (although in different forms with respect to systematics). There are also examples of systems that make active use of “watchdogs”, i.e. CSOs, in their monitoring and reporting systems, e.g. Finland. Ireland is probably the country which has gone furthest in its attempt to establish a systematic

monitoring system of PCD by developing a set of PCD indicators for the country. However, this system has not produced any significant results compared to other monitoring and reporting systems (ecdpm 2013).

The weaknesses of Norway’s main mechanism for monitoring PCD, the annual report to the Parliament, have been discussed above. In addition to having established the annual reporting mechanism, it may be argued that the Government sustains a system of “watchdogs” by funding critical PCD monitoring activities carried out by CSOs. However, there is no formalized system established to follow up the outcomes from such activities. The planned policy coherence commission has a potential of formalizing the role of CSOs in the Government’s efforts to ensuring PCD, although the composition and the mandate of the commission is still unclear.

4. Reflections on the ground: The case of Myanmar

4.1. INTRODUCTION

This part of the report looks at how the MFA works to ensure Policy Coherence for Development (PCD) at a country level, through a case study of Myanmar (2008–2017), and identifies and analyzes links between the general findings and the findings from the case study. The assessment include: local initiatives or mechanisms that are relevant on a general level; Norwegian policy objectives in Myanmar; interests of Norwegian actors; dilemmas with regard to PCD, and how these dilemmas are addressed; feedback mechanisms from country level to the MFA.

Through text studies and interviews with a broad spectrum of stakeholders in Norway and Myanmar, the evaluation analyzes actions, statements and policy objectives in their historical context and in line with established values, norms and traditions at the time.

In our interviews we have focused on:

1. The conceptual understanding of PCD
2. Strategies
3. Actors
4. Dilemmas
5. Measures to ensure PCD
6. Responses to signals of incoherence
7. Obstacles and opportunities in ensuring PCD
8. The state of play for PCD in the Norwegian engagement in Myanmar

Section 4.2. outlines the history of Norwegian engagement in Myanmar, while section 4.3. presents the identified PCD dilemmas of this engagement. In section 4.4. the Norwegian efforts to handle dilemmas and to ensure PCD in Myanmar are assessed. These efforts are divided into a section on instructions from the MFA (4.4.1.) and a section on operationalization on the ground (4.4.2.). Finally, section 4.5. presents a summary of the findings.

4.2. OVERVIEW OF THE NORWEGIAN ENGAGEMENT IN MYANMAR

Since the devastations of Cyclone Nargis in 2008, Myanmar received a substantial increase in humanitarian aid from Norway. After nearly 50 years of military rule and 60 years of harrowing civil wars, with more than a dozen armed groups, the country was economically backward, politically dysfunctional and internationally isolated.

With the reform process following the 2010 general elections in Myanmar, the country was singled out as one of the priority countries for Norwegian assistance. A Memorandum of Understanding between Norway and Myanmar was signed in 2014. Since then, Norway has had two main priorities in Myanmar:

- › Peace, democratization and reform process
- › Sustainable management of natural resources, energy and environment/-climate change

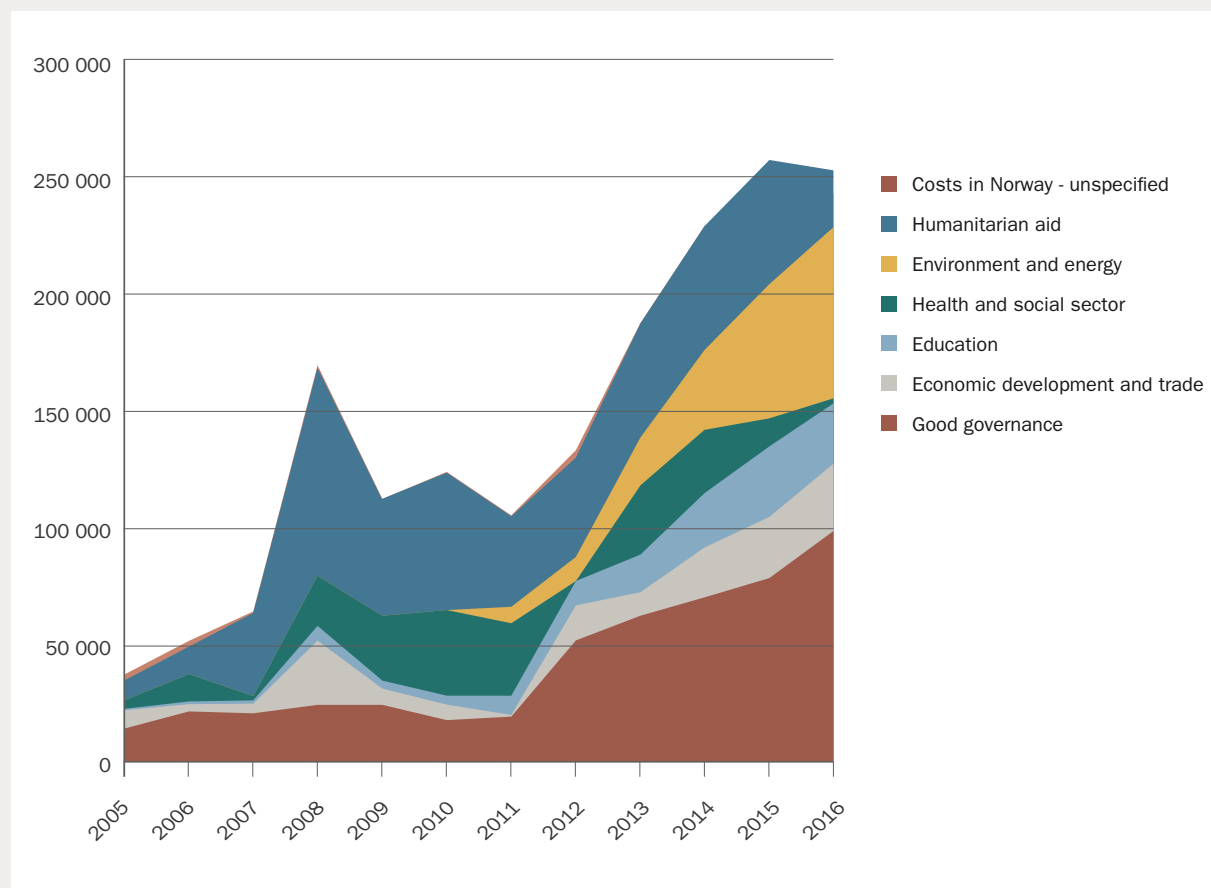
From 2010 to 2012 Norwegian non-governmental organizations received approximately 50% or more of the Norwegian funding, mostly to governance and emergency aid. In 2016, 29% of development aid was allocated to the environment and energy. The other large area was “good governance” at 39%. From 2012, Norway’s public sector became a substantial recipient of foreign assistance (7% of all aid in 2012; 15% in 2016). From 2013, the share of Norwegian NGOs was below 50% (38% in 2016). Norwegian aid to Myanmar peaked at NOK 256.4 million in 2015.

The overall goal of Norway’s Myanmar policy has been to support efforts to achieve a democratic and peaceful Myanmar. While this goal has been fairly consistent over the past decades, the strategic assessment of how to achieve these goals gradually changed over time. We can roughly divide the engagement into four periods: before 2008; from 2008 to 2012; from 2012 to 2015; and post-2015.

4.2.1 Engagement prior to 2008

The early Norwegian engagement towards Myanmar focused on support to exile communities and refugees on the Thai-Myanmar border, along with support for exile organizations such as the Democratic Voice

FIGURE 3 // NORWEGIAN AID TO MYANMAR 2005–2016, MILLION NOK



Source: Norad

of Burma that broadcasted from Oslo. A strict sanction regime towards the military junta was enforced in line with other Western countries. However, from 2006, the Norwegian Embassy

in Bangkok was engaged in discussions with central figures within the Myanmar business sector with links to the powerful Myanmar military. Often referred to as “the third force”,

BOX 2 // MYANMAR – A COUNTRY OF CONTESTED POLITICAL TRUTHS

The modern history of Myanmar is marred by two long-running and paramount conflicts:

- › 50 years of military dictatorship and the fight between the military and democratic forces
- › 70 years of continuous civil wars between the military and dozens of politically and ethnically defined armed groups.

The military still holds substantial power in Myanmar's politics through the constitution, and the civil war is still fierce, particularly in the North and the Northeast. Both democratization and the peace process are slow. How Myanmar stakeholders assess the political realities depends on where they are positioned with regard to these two conflicts. Broadly speaking, we can identify three categories of political world views:

- › The perspective of the military
- › The perspective of the democracy movement
- › The perspective of ethnic and religious minorities

While, for a long time, the democracy movement and the ethnic and religious minorities found a common enemy in the military, it is not a given that their interests are the same with regards to power sharing and economic redistribution.

this group of people was forging links with Myanmar academics and civil society groups willing to work with reformists within Myanmar. Norway's dialogue engagement was controversial at the time, and was met with

criticism from a number of CSOs, particularly those working along the Thai-Myanmar border. However, the engagement had clear backing from the political leadership in the MFA.

4.2.2 Engagement 2008–2012

From 2008, the engagement policy was intensified, and, in the wake of the devastations of Cyclone Nargis, State Secretary Raymond Johansen visited a donor conference in Myanmar. The visit was followed up by the first Norwegian Ministerial visit to Myanmar by the Minister for Environment and International Development, Erik Solheim. During these years, the Norwegian support to CSOs inside Myanmar increased significantly, while the international sanction regime continued.

4.2.3 Engagement 2012–2015

With the reform agenda launched in 2011 by President Thein Sein, who took office after a contested national election in November 2010, the Norwegian government made the decision to engage fully with the Myanmar government. Civil society support inside Myanmar was upheld, while the Norwegian government signaled that cross-border support would be phased out. Norway accommodated a number of requests by the Thein Sein government and his most trusted ministers, Soe Thane and Aung Min, to support the reform

agenda and the peace process. While the Myanmar government had negotiated ceasefire agreements with a number of armed groups, among them the Karen National Union that had been fighting the Union government since 1947, renewed fighting with the Kachin Independence Army and other armed groups in the Northeast of the country severely hampered the peace process.

In 2012, Norway was among the very first Western countries to lift economic sanctions against Myanmar and a diplomatic mission was established in Yangon, with continued support from the Embassy in Bangkok. The Myanmar Peace Support Initiative (MPSI) and the Peace Donor Support Group were fronted by Norway. There were several minister-level visits between the two countries. In 2013, Norway cancelled Myanmar's debt and upgraded its diplomatic mission to a full embassy.

4.2.4 Engagement post–2015

The early Norwegian engagement with the Thein Sein Government was subject to much controversy – applauded by some, condemned by others. One of the critics was National League for Democracy (NLD) leader Aung San Suu Kyi, who, in 2016, formed the first democratically elected government in more than 50 years. It was therefore a calculated

risk that the close relations with the Thein Sein Government could backfire in terms of reduced influence with the change in government. While Norway has continued its engagement for democratic reforms and peace, its footprints are reduced due to altered political realities and more rigid political processes. With the new civilian and popularly elected government there is also more friction in Myanmar politics. While the Thein Sein government had a great deal of goodwill from the military, the military is considerably more skeptical towards the NLD-led government, President Htin Kyaw and State Counsellor Aung San Suu Kyi. The Commander in Chief Min Aung Hlaing is positioning himself towards the next election in 2020. Both the democratization process and the peace process have stagnated, and the refugee crisis in northern Rakhine State adds another major challenge – for the Myanmar government and the international community and donors alike. In this complex political situation, the role of civil society and an independent media are key in ensuring a critical public sphere that can scrutinize the democratization process and the peace process.

The aim of the Myanmar government is that more international support should go through the government or be coordinated by the Government. This is highly problematic from the perspectives of some of the ethnic armed groups who control large areas and seek international support for service deliveries. Norway, as well as other international partners, seeks to find ways to support such groups and the ethnic minority side of the conflict in addition to the government side.

4.3. DILEMMAS

With the shift in Norway's engagement in Myanmar, Norway faced considerably more dilemmas in the period after 2012 than it had done in the two previous phases. Respondents identified seven main dilemmas with regard to PCD that Norway has had to handle in Myanmar. The dilemmas can be divided into two main categories:

- › Dilemmas related to conflict of policy objectives beyond development (2 dilemmas)
- › Dilemmas related to strategy towards development (5 dilemmas)

4.3.1. Dilemmas related to conflict of policy objectives beyond development

1) Business engagement and commitment to peace

Norwegian corporations such as Telenor and several Norwegian government agencies provided training and consultancy to the Thein Sein Government at an early stage. From the Myanmar government's side, this was highly valued and central figures within the Thein Sein government still express sincere gratitude to the Norwegian diplomatic staff and to the MFA's Myanmar team for this assistance. In a period where the Norwegian government was deeply involved in the peace process and the reform of Myanmar's public sector, the Norwegian Embassy in Bangkok also hosted several exposure trips for Norwegian businesses in Myanmar. These trips captured a considerable amount of attention and critics speculated whether access for Norwegian investors was the main priority for the Norwegian government, and that the peace commitment was primarily used as door-openers for Norwegian companies. When Telenor won one of two bids for the lucrative Myanmar telecom licenses in 2013, speculations about Myanmar biases towards Norwegian companies started circulating in Myanmar. The transition of highly profiled

diplomats and politicians from the MFA to central positions in Norwegian corporations involved in Myanmar (Telenor, Statoil) nurtured these speculations. However, the telecom bid was carried out in a transparent manner according to international standards with tenders, bids and a shortlist selected by independent consultants.³¹

From 2014, the Solberg government outlined clear expectations to promote Norwegian businesses in developing countries. This presented the Embassy with a dilemma on how to integrate this policy into the long-term priority to support democratization and peace in Myanmar. There were potential conflicts of policy objectives between business and peacebuilding in this trade-off. While the Embassy is content with how this is balanced in Myanmar, a number of development organizations, humanitarian organizations and CSOs remain concerned about the potential risk that foreign investors with little knowledge about Myanmar's many conflicts could undermine the peace process.

³¹ During our interview, former Myanmar Minister Soe Thane, described in detail how the Government strived to follow international standards.

CSOs and various Myanmar stakeholders are generally positive towards Norwegian businesses in Myanmar, overwhelmingly due to the good reputation of Telenor. There is a clear assessment that Myanmar is in need of responsible foreign investments and businesses and it is assumed that Norwegian businesses have better standards and are more accountable than other corporations, typically from other Asian countries. There are, nonetheless, several dilemmas for the Norwegian Embassy in ensuring that Norwegian businesses know the local context and power structures, and that they operate in a responsible, accountable, transparent and conflict-sensitive manner. Embassy staff and stakeholders in Myanmar underlined that these dilemmas are greater in the cases of smaller companies compared to larger, partly state-owned corporations like Telenor.

2) Natural resources development and peace

In the document "Myanmar: Status og videre engasjement" (Myanmar: Status and further engagement) (11.11.2013) to the Minister of Foreign Affairs, the MFA's Myanmar team outlined the next stage of Norwegian engagement in Myanmar. Two major components of the development cooperation were defined to be:

- › Peace, democracy and reform
- › Sustainable management of natural resources, energy and environment/-climate change

While the first component represented a natural follow-up of earlier commitments and the MPSI engagement, the other component was based on an assessment that Norwegian companies and agencies have, over the years, developed expertise on natural resources management that may be of high relevance for Myanmar. Myanmar is particularly rich on natural resources, including hydropower, and the country is in great need of sustainable energy sources. However, many of these resources are located in conflict areas or in areas where the authority of the union government is contested. Involvement in such areas is therefore controversial and disputed.

A difficult dilemma for the Norwegian government's development agenda has been to incorporate the peace agenda into the sustainable management of natural resources. It cannot be expected that technocrats and engineers in Norwegian companies and agencies in the natural resources management sector should be able to develop full contextual mappings and strategies for conflict sensitivity

in contested areas.³² This responsibility must be shared with the MFA. The case of SN Power's (Statkraft and Norfund) hydropower initiative, the Middle Yewya dam in Shan State is a case in point (see separate box) and was raised by several respondents in Myanmar. Despite being carried out by a fully state-owned company, with an explicit development agenda, the Middle Yewya project was criticized for insufficient risks assessment and consultations with local stakeholders.

4.3.2. Dilemmas related to strategy towards development

1) Support for peace and democratization and legitimization of the military's agenda

With its early engagement with the Thein Sein government, Norway provided legitimacy to a government with close links to a brutal military dictatorship. Some critics accused the Norwegian government of being naïve and blind to the military's agenda to secure continued control over vital strategic interests. Considering the long-term focus on dialogue with various political actors inside and outside Myanmar, dating back to 2006, and the continuous political commitment from the

³² A Baseline Study of Norwegian Development Cooperation within the areas of Environment and Natural Resources Management in Myanmar, Fafo, May 2015.

BOX 3 // AN EXAMPLE OF THE DILEMMA OF NATURAL RESOURCES DEVELOPMENT AND PEACE

In 2014, the Norwegian state-owned company SN Power signed a MoU with the Thein Sein Government to investigate at the feasibility stage, the hydropower opportunity in the Myitnge river (also called Namthu) situated in the Shan State. SN Power has a clear development profile and was at the time owned by Statkraft and Norfund.

The early phase risk assessment report the company produced was positive. The planned project, known as the Middle Yewya project, was assessed to have little negative environmental impact as its location was planned between one existing hydropower project (the Yeywa), and another already under construction (The Upper Yeywa). The location was in a scarcely populated area and it was assessed that the project could achieve a capacity of up to 690 MW, roughly 15% of the total existing power production in Myanmar. Overall, this was good news for a country heavily in need of clean and sustainable electricity.

In 2016, all three Yewya projects in the Namthu River Basin received criticism from local groups, including the Shan State Farmers' Network, representing some 50,000 members, the Shan Human Rights Foundation, the Shan Sapawa Environmental Organization and other organizations within the broad alliance of Shan organizations in the Action for Shan State Rivers Network.

The criticism was primarily directed towards the Upper Yeywa project for not considering the local political contexts in the contested area in which it was operating. The well-intended and technically well-planned Middle Yeywa project also encountered difficulties. Hydropower is exceptionally sensitive in ethnic minority areas as it goes straight into the core of power sharing between the Bamar majority in the central government and the military on the one hand, and local ethnic minorities who dispute the legitimacy of the state on the other.

Over the past few years, the Myanmar military has launched a massive offensive against the SSPP (an armed group that has not signed a ceasefire agreement with the central government) in Shan State, north and northeast of the project area. SN Power had largely consulted the central government and the regional government (accountable to the central government, not the local population or the ethnic armed groups who control large areas along the river).

SN Power was faced with the critical question of who owns the water resources. This goes to the core of the conflict in the many civil wars in Myanmar, Shan State included. If the electricity goes to central Myanmar, without benefits for the local communities, such projects risk ending up as conflict drivers, rather than the positive development projects they were intended to be.

At the time of writing this report, SN Power is committed to solve the political issues of sharing the benefits from the water resources between relevant stakeholders, prior to the commencement of any projects. Meanwhile, the company faces a number of challenges from an inefficient Myanmar bureaucracy. In 2017, Statkraft sold its shares in SN Power, which is now fully owned by Norfund.

The Middle Yewya hydropower project is an illustrative example of a possible dilemma where there are conflicts of policy objectives. The objectives of producing much-needed and profitable electricity, believed to facilitate development in the area, could contradict the objective of peacebuilding. The project also reveals a dilemma related to perceptions of the development concept. While some actors see the development of infrastructure as a key to peace, others view these developments as potential conflict drivers.

political leadership of the MFA, throughout this period, there is little reason to believe that the choice to engage with the Thein Sein government was hasty or uninformed. Rather, respondents state that it was a clear political choice – supported by some and criticized by others. While the risk of providing legitimacy to the continued involvement of the military in Myanmar politics was a clear strategic dilemma, this choice was not based on PCD. The decision was made based on a conviction that this was the right moment to start normalizing relations to Myanmar.

2) Support for cross-border aid and refugee camps and new peace dividends

Another political choice was the decision to phase out cross-border aid and the support for refugees on the Thai-Myanmar border. This strategic dilemma was more directly linked to PCD, as some of the priorities that were made had direct consequences for vulnerable people who experienced cuts in their food rations and social welfare services. While the cuts were clearly announced in advance, the shift from supporting refugees and internally displaced persons (IDPs) from along the Thai border, to IDPs reached from the Myanmar side through the MPSI projects, represented a clear strategic dilemma with implications for PCD. The Norwegian diplomatic

mission to Yangon and the MFA saw it as the right political priority to support the new ceasefire areas and endeavor to facilitate peace dividends in these areas.

3) Communication of strategy and efficiency

While the Norwegian government received critique from some organizations, particularly along the Thai-Myanmar border and some of the Burma campaign groups in the West, it was praised by civil society groups and the business sector in Myanmar. Most of the criticism received was based on conflicting political convictions, but some may also have been rooted in a frustration from organizations that were losing financial leverage and influence. Respondents have pointed out that the Norwegian government could have been clearer in communicating strategy in these early years. With the high level of activities, the scarce human resources of the Embassy in Bangkok and the diplomatic mission in Yangon in the period 2011–2013 were stretched to the limit. The diplomatic staff was faced with the strategic dilemma between spending time implementing plans and clearly communicating a strategy to ease tension among stakeholders. Diplomats have made it clear that they did not prioritize reaching out to certain groups that they saw as “difficult or impossible to convince”.

4) Civil society support and other priorities

The long-term support for CSOs in Myanmar proved to be a vital component in the early reform years, both with regard to sustaining pressure and holding the government accountable, and to having access to capable and well-organized civil society groups and community-based groups in the implementation of the MPSI projects.³³ The importance of a vibrant civil society proved to be just as significant after the 2015 election, with the formation of a democratically elected government. In 2015, 2016 and 2017, many of the local partner organizations of the Norwegian NGOs with a long history in Myanmar experienced cuts in their allocations, in addition to considerable unpredictability regarding if and when funding would be provided. Several respondents explained that this has placed many local organizations in a difficult position with direct impact on their ability to operate.

³³ Lessons Learned from MPSI's work supporting the peace process in Myanmar, Government of Norway, March 2014.

5) Human rights advocacy and continued engagement – the Rakhine crisis

During the time of research for this evaluation, the crisis in northern Rakhine State escalated dramatically. When a marginal group of militants from the Rohingya diaspora attacked Myanmar security forces on August 25, 2017, the military answered with the collective punishment of an entire ethnic group. By the end of 2017, more than 650,000 Rohingya refugees from Rakhine had crossed the border to Bangladesh. The refugees escaped brutal killings and abuse by the Myanmar military of a currently unknown magnitude.

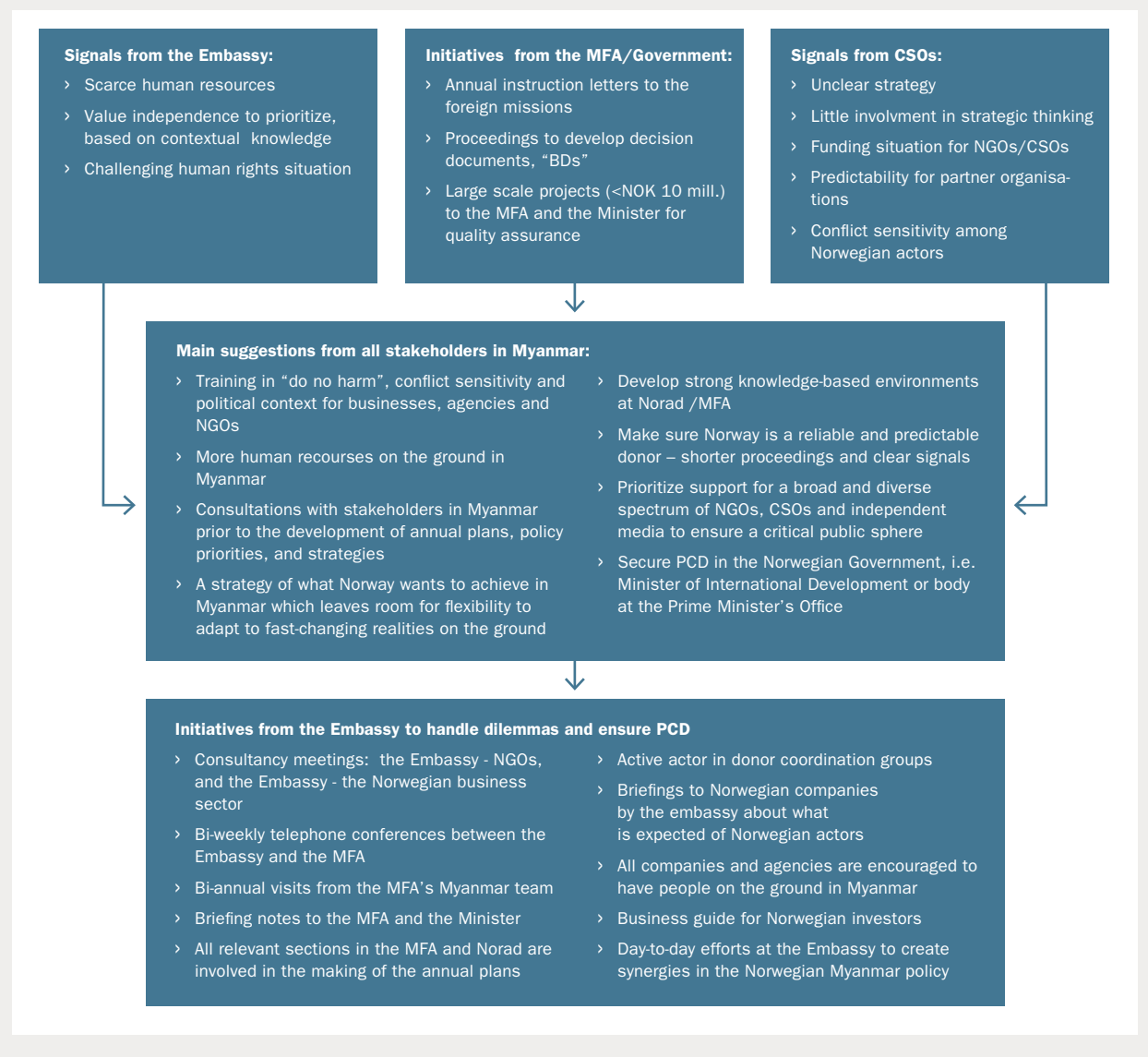
While the responsibility for the atrocities lies with the Myanmar military, it is clear that the civilian government and the State Counselor could have done more to protect vulnerable groups in Rakhine and raise concern over the atrocities. At the same time, the Myanmar public is overwhelmingly opposed to granting civil rights and citizenship to the Rohingya population, and the Rakhine crisis is politically explosive and could jeopardize stability far beyond Rakhine State. International donors are left with a clear strategic dilemma between openly pushing the human rights agenda, with the possible consequence of implementing sanctions, and continuing to work with the government on democratization and peace

and instead voice concerns about human rights abuses behind the scenes. The Norwegian priority is currently an attempt to balance this dilemma by continuing the engagement with Myanmar at the same time as concerns about the Rohingya crisis are raised with the Myanmar government in private as well as in public statements and in the media. Norway has also clearly expressed the expectation that the Myanmar government starts implementing the recommendations from the Advisory Commission on Rakhine State, led by Kofi Annan. However, it is challenging to balance between criticism and support in such volatile situations and the few Myanmar CSO representatives who raised concern about the Rakhine crisis, expressed disappointment that Norway is not more vocal about the military's human rights violations and the civilian government's inability to respond.

4.4. NORWAY'S EFFORTS TO HANDLE DILEMMAS AND ENSURING PCD IN MYANMAR

This report has found that there are few formal mechanisms, systems or initiatives for PCD initiated by the MFA at the national level. For the Myanmar case study, the evaluation team has both searched for formal instructions from the MFA to the Embassy in Yangon (and in Bangkok 2008–2012) (4.5.1.) and assessed the actual practices on the ground at the Embassy and how the diplomatic staff operates to ensure a coherent Norwegian policy for development in Myanmar (4.5.2). We have analyzed how the Embassy works, and how it has worked over the past ten years, towards strategic planning; how it identifies and handles dilemmas; and how it consults the MFA, the various business actors, civil society actors, and political actors in Myanmar. For this part of the report, the team has interviewed ambassadors and Embassy staff, members of the MFA's Myanmar team, members of the diplomatic community in Yangon, former Myanmar ministers, Myanmar political advisors and political analysts, Norwegian NGOs in Myanmar, and all of the most central local partners of the Norwegian NGOs in Myanmar. In so doing, the entire period from 2008 to 2017 has been covered.

FIGURE 4 // RELATIONSHIPS BETWEEN PRESSURES FOR PROMOTING PCD AND INITIATIVES TAKEN TO ENSURE PCD BY THE EMBASSY IN MYANMAR



4.4.1. Policy instructions from the MFA to the Norwegian Embassy in Bangkok and Yangon

As described in section 2.3.3. of this report, the team has traced and analyzed the policy instructions from the MFA to the foreign mission to Myanmar, as well as the briefings from the Embassy in Myanmar to the Ministry. The following four types of documents were reviewed:

- > Reports and briefing notes from the MFA’s Myanmar team to the Minister of Foreign Affairs
- > The annual instructions for the foreign missions, “årsinstruks for stasjonene”
- > The annual plans, “virksomhetsplaner”, from the Norwegian Embassy
- > The annual allocation letters, “tildelingskriv”, to the Embassy

Our main finding is that there is little focus on PCD in the communications with the embassies and the foreign missions. In the annual allocation letter of 2008, the MFA underscores that the Minister of Environment and International Development had initiated a discussion about the totality of Norwegian policies in developing countries and that Norwegian international development policy

should be an integrated part of the country's foreign policy:

*“The Minister of Environment and International Development has initiated a broader debate about the collective Norwegian policies in developing countries [...] the embassies are asked to take note of the broad political consensus that international development goes beyond aid and that the international development policy should be an integrated part of our foreign policy and our trade policy. Norwegian development policy shall be a tool to influence global, regional, and national conditions for international development.”*³⁴

(Annual allocation letter to the Embassy in Bangkok 2008)

The specification should be seen in conjunction with the Official Norwegian Report “Coherent for Development?” (2008) and the White paper “Climate, Conflict and Capital” (Report to the Storting 13 2008/2009) that were both underway. However, after this specification, there are few traces of instructions to ensure PCD. In 2010, it is repeated that Norway's international development policy shall be an integrated part of the country's foreign policy. There are, however, no other guidelines or measurements regarding the implementation of such policies, and the

³⁴ Authors' translation from Norwegian.

annual plans from the Embassy accordingly do not further specify this point.

The annual instruction for the foreign missions was established as the leading guideline for annual planning from 2011. In the instruction, the White paper on “Climate, Conflict and Capital” (see above) is referred to as the Government's policy, but the content of this White paper is not reflected in the instruction. It is also indicated that the embassies will be asked to formulate 3-year plans for their development engagements in their host countries. The Embassy in Yangon picks up on this point in 2014, where it states that the Embassy, in cooperation with the MFA and Norad, will develop a 3-year plan for the development cooperation between Norway and Myanmar.

After the change of government in 2013, there are few changes with implications for PCD in the annual instructions for the foreign missions of 2014. One apparent change is the increased focus on business for development, including trade-related development cooperation. Embassies are expected to report specifically on this point.

In 2015, the Solberg government had made its mark on the annual instruction. The focus

on business in the development policy is clearly present, with an implied assumption of the benefits for developing countries. At the same time, the actual wording of policy coherence is explicitly stated for the first time in the communication with the foreign missions. Reflecting the Sundvolden Declaration, the focus is on policy coherence and not specifically on policy coherence for *development*. However, it is stated that Norwegian efforts should, to as large an extent as possible, be coherent with the policies and priorities of the countries in question:

*“The government' foreign policy and international development policy shall be results oriented, based on facts, built on economic analyzes and contribute to Norwegian policy coherence [...] To achieve good results, Norwegian efforts should to the largest extent possible cohere with the countries own policies and priorities.”*³⁵

(Annual instruction for the foreign missions 2015, p. 8)

From 2014, there is a distinct focus on business and the promotion of business (“*næringsfremme*”) in the annual allocation letters from the MFA, with a particular focus on Norwegian business interests:

³⁵ Authors' translation from Norwegian.

*“The increased commitment to commercial development in international development cooperation must be reflected in the reports from the missions. An account of the conditions for commercial development and of the host country’s priorities in this field is important. The same goes for the existing Norwegian commercial engagement and the possibilities for increased involvement of Norwegian actors.”*³⁶

(Annual instruction for the foreign missions 2015, p. 11)

At the same time, the budget post on Peace and Reconciliation was significantly cut from 10 million NOK in 2015 to 1 Million NOK in 2016, with an increase to 6 million NOK in 2017. The support for democratic reform and the peace process in Myanmar remains the number one priority of the Norwegian Embassy and continues to define the Norwegian Myanmar policy. The annual allocation letters and the annual plans do not discuss any potential dilemmas between the main strategic goal and the increased emphasis from the government and the Ministry on the promotion of business, nor do they address how the subordinate goals may support the primary goal.

There are few overarching guidelines on PCD in the annual instructions and annual allocation

³⁶ Authors’ translation from Norwegian.

letters to the embassies in Bangkok and Yangon in the period 2008–2017. No formal mechanisms or systems to ensure PCD have been initiated. When specific policies are promoted and emphasized by the Government, the embassies are obliged to comply with these policies and implement them locally. It is then up to the embassies to handle potential policy incoherence between new policies and existing strategies and commitments on the ground. In the 2014 annual plan from the Embassy in Yangon, the instruction to promote business was handled by incorporating the new policy requirements into the overall long-term priority to support democratization and peace:

*“The work to promote business is linked with the overall ambition of contributing to democratic reform, economic [reform] and the peace process. Conflict sensitivity and sustainability are key, but also the objective of utilizing the potential in business investments to support the political goals.”*³⁷

(Annual plan for the Norwegian Embassy in Yangon 2014, p. 5)

In the annual Instruction from 2017, the Prime Minister’s commitment to the 2030 Agenda for Sustainable Development is distinctly present. With the political leverage of the 2030

³⁷ Authors’ translation from Norwegian.

Agenda, where policy coherence for sustainable development (PCSD) is clearly addressed, this marks a window of opportunity to streamline PCD in a meaningful way for the future, at home and in the host countries.

4.4.2. Operationalization on the ground in Myanmar

A consistent characteristic of the Norwegian Myanmar policy in the period 2008–2017 is the deliberate strategy of not formalizing a strategy that defines the goals or theories of change of the Norwegian engagement in Myanmar. The rationale is that this leaves the Embassy with much-needed flexibility to respond to new needs and fast-changing dynamics on the ground. While some attempts to formalize strategies have been made, these attempts were never put to use.³⁸ Norwegian diplomats typically compare with the Swedish model, which they find to be too rigid and potentially constraining.³⁹

The fact that no Myanmar strategy has been formally recorded does not mean that there is no consistent plan or strategic thinking behind the Norwegian engagement. Peace and democratization has been,

³⁸ Some sources refer to a Myanmar strategy of 2012, but the team has not been able to locate this document.

³⁹ Interview with Norwegian diplomats.

and still is, the overall guiding principle and all new projects and initiatives are assessed in light of this overall priority.

When Norway, through its energy program, engages in discussions with the Myanmar Government over the Norwegian financing models of hydropower, to the government, and to ethnic armed organizations in Myanmar, this is done as a contribution to the peace process. The Norwegian model, where one part of the revenue goes to the central state and the other to the municipality, is viewed as a potential model for how Myanmar can exercise power sharing between the government and armed groups in a future federal state formation. Similarly, the financial support to the Mon National Education Committee is prioritized as a way to bring ethnic minority education systems into the national discussion about education reform. The thought is that the Mon national education system could also be a model for other ethnic minority areas. This would represent another example of federalism in practice, particularly important in a time when the formal peace process seems to be deadlocked.

Current and former Embassy staffs highly value their independence and flexibility. The Embassy is closer to the realities on the

ground compared to politicians and bureaucrats in Oslo. However, there is systematic reporting and regular hearing processes on Myanmar between Yangon and Oslo, not only with regards to formulating the annual plans, but also throughout the year. The fact that there is a Myanmar coordinator at the MFA is a clear indicator that coherence is prioritized in the Norwegian engagement in Myanmar. Strategic thinking and analytical exchange also comes to show in the briefing notes from the Embassy to the Minister or State Secretaries, as well as in the comments on these notes from the Minister or State Secretaries back to Yangon.

Over the past 10 years, there have been few discussions about PCD at the Embassy, but there is a clear assumption that the Norwegian diplomatic staffs are well equipped to handle dilemmas of PCD or signals of incoherence as they appear, without formalized mechanisms or an official strategy.

However, this practice of not formalizing a long-term strategy leaves the Embassy and the MFA vulnerable and dependent on continuity, personal initiatives and strategic and visionary individuals. In such settings, the agenda is defined by a few individuals, and respondents raised concern that biases could be inherited

and that organizations risked not being judged solely on merits and achievements.⁴⁰

Another challenge with this approach is that it is not transparent, and thus vulnerable to criticism from the outside. Critics who do not see the full strategy, can seemingly get their assumptions confirmed if there is no documentation to counter them. Moreover, without a clear strategy of aspired achievements, priorities and measures to achieve goals, it is difficult to assess the impact of policy efforts. It is important to note that there are ways to formalize strategies without creating rigid and inflexible systems.

Swedish diplomats emphasize the process of developing strategies as more valuable than the end product itself. The Swedish Embassy and SIDA work closely together in this process. Comprehensive consultations with stakeholders bring new perspectives into the process and also create a common understanding, ownership and shared ambition between the Embassy and the stakeholders. The Norwegian approach is more informal.

40 Several NGOs raised the concern that a few organizations are not considered by the same parameters as others. Current and former diplomats pointed out that not all organizations received the same attention in their critique of the Norwegian Myanmar policy.

The Norwegian Embassy in Yangon generally addresses dilemmas in a more ad hoc manner, through consultancy and informal communication with stakeholders. The Embassy arranges regular consultation meetings with the Norwegian NGOs operating in Myanmar and meets irregularly with their partners. But the NGOs do not feel that they have impact on Norwegian priorities.

Norwegian NGOs find it problematic that the Norwegian MFA keeps an increasing amount of funds unallocated until late in the year to retain the flexibility. Combined with long proceedings, this leaves local partners with no flexibility and much uncertainty with regard to whether or not they can implement their planned projects, as well as whether they can retain their staff:

“Who needs the flexibility the most – is it the organizations on the ground or is it the Norwegian Ministry of Foreign Affairs?”⁴¹

The Embassy also meets with the Norwegian business sector in Myanmar and is involved in the Myanmar-Norway Business Council. In 2016, the Embassy cooperated with the Myanmar-Norway Business Council and

⁴¹ Interview with an NGO representative in Yangon. This concern was raised by a number of other NGOs.

Innovation Norway in producing a business guide for Norwegian investors in Myanmar.⁴² This guide could be seen as an initiative to ensure PCD, although it mainly addresses practical issues. It does not discuss dilemmas of investments and peace and development, and the considerations of conflict sensitivity, political dynamics and contested power structures, the way the Norad-funded investment guide launched by the Norwegian Burma Committee in 2017 does.⁴³ However, the Embassy does contribute to increased awareness about responsible investments in conflict areas through the support to the Myanmar Centre for Responsible Business.

The Norwegian Embassy in Yangon is generally viewed as open and accessible to stakeholders in Myanmar. The informal consultations seem to work, although there are few cross-sectoral interactions facilitated by the Embassy where NGOs and the business sector are brought together. The Embassy keeps close contact with the Myanmar team at the MFA and consults them in bi-weekly telephone conferences about strategy, dilemmas and challenges, and otherwise whenever needed.

⁴² *Myanmar: A Business Guide for Norwegian Investors*, Myanmar-Norway Business Council, January 2016.

⁴³ *Hvordan redusere risiko: En guide for norske selskaper i Myanmar*, The Norwegian Burma Committee, February 2017.

Other relevant sections and departments in the MFA and in Norad are also consulted. While not explicitly intended to ensure better PCD in the Norwegian engagement in Myanmar, these consultations are examples of initiatives that can have that effect. However, in the absence of formal co-ordination, neither the Embassy nor any other Norwegian government unit have the total overview or influence over all Norwegian activities in the country (even government activities). This limits Norway's capacity to ensure synergy between the various activities.

4.5. SUMMARY

Similar to the findings of the overall Norwegian PCD, there are few formalized mechanisms to ensure Norwegian PCD at the country level. While there have been initiatives at the Embassy in Yangon to address strategic dilemmas and conflicts of policy objectives as they appear, there are no instructions about this from the MFA in Oslo, and the Embassy has thus had few strategic discussions about such dilemmas, how to handle them, and what mechanisms are needed to ensure PCD in the Norwegian Myanmar policies.

A critical reflection over dilemmas of PCD in Myanmar and a process of strategic discussions with a wide range of stakeholders that could lead to a flexible strategy would

benefit the Embassy, as it would obtain valuable input from stakeholders, who, at the same time, would have a clearer idea of the Norwegian engagement.

As the promotion of business in Myanmar is prioritized by the Government and seen as a core task of the Embassy, the Embassy also needs a better system with which to coordinate with the Norwegian business sector, government agencies and NGOs. One initiative could be to ensure training in conflict sensitivity and the political context in Myanmar.

PCD is typically put on the agenda when dilemmas or conflicts occur. NGOs and CSOs play a crucial role in facilitating a critical public sphere that will send signals and express pressure to ensure PCD. Norway should therefore support a broad spectrum of politically diverse organizations, both inside and outside Myanmar, that can push for PC(S)D.

5. Conclusions

5.1. MAIN FINDINGS

5.1.1. MFA's and the Government's efforts to ensure PCD

In several white papers, the Norwegian Government has expressed a clear commitment towards ensuring Policy Coherence for Development (PCD), first in the Government White Paper 35 (2003–2004) “Fighting Poverty Together – A coherent Policy for Development”, and the latest in White Paper 25 (2016-2017) “Common Responsibility for Common Future”. In addition, the objective of ensuring PCD is mentioned in the “The Sundvolden Declaration”, which constituted the political platform of present PM Erna Solberg's first government.

Based on recommendations from the Official Norwegian Report (NOU) 2008:14, “Coherent for Development? — How coherent Norwegian policies can assist development in poor countries”, the Section for Development Policy in the Ministry of Foreign Affairs was given responsibility for monitoring relevant policy areas and coordinating work to follow up the Government's commitment to PCD, primarily

through a responsibility for producing an annual report on PCD to Parliament (Storting) from 2011. Within this unit, one person has had PCD as his/her main area of responsibility.

To date, the establishment of a reporting mechanism on PCD is the only concrete structural measure that has been initiated to ensure overall PCD within the government system. However, a number of other initiatives have been taken to address various incoherencies in specific sectors or areas. A general feature of these sector specific initiatives is that they are not directly traceable to the MFA and the Ministry's responsibility for cross-sectoral coordination of the Development policy, including PCD. Rather, these initiatives have resulted from pressure by external actors, such as CSOs, political parties, media, and international institutions directly influencing the ministries or other government units responsible for the sector or area in question.

A distinct example of this process is the establishment of the Council on Ethics for the Government Pension Fund Global in 2004.

This council was established by the Ministry of Finance, principally based on pressure from CSOs and political parties (Ramberg 2011) and which, since then, has acted like a CSO within the government system. Other examples include the regulations and guidelines that the Ministry of Finance has implemented based on the council's recommendations, and the regulations established to direct the state's purchase of specific products such as timber from rainforests or palm oil, which may undermine Norway's policy and efforts to protect forests of global importance.

The reactive and sector-based establishment of regulations also reflects that *informal* mechanisms and initiatives are the main tools available for MFA to promote PCD. Such mechanisms include case-by-case communication and meetings with relevant stakeholders, i.e. other MFA units, other ministries, government agencies or business companies. There are only a few examples of more formalized intra- and cross-ministerial groups or committees having been temporarily established at the initiative of the MFA to discuss specific topics related to PCD.

The vast majority of government respondents interviewed for this evaluation see this “system of informality” as a unique strength of the Norwegian bureaucratic system. It ensures the flexibility needed for the Government to respond efficiently to changing contexts. It was also a clear assumption by most of the same respondents that such a system works effectively towards ensuring PCD, and that it is important not to introduce more formal mechanisms for ensuring PCD. Due to the strong notion of sectoral responsibilities, it is difficult to put in place formal mechanisms to ensure PCD across different ministries and departments. Because formal cooperation and coherence is difficult, it is the informal mechanisms that seem to be working best.

There are indeed some good arguments for claiming that the informality of the Norwegian governmental and bureaucratic system does produce the flexibility and open access needed for being able to respond to signs of incoherence. This characteristic may also explain the fact that the initiatives and mechanisms identified in this evaluation, and which have proven to influence PCD positively, have been responses to case-specific signs of incoherence and have not come about as a result of mechanisms established for the general purpose of ensuring PCD.

However, we have no way of knowing what would have been achieved by such mechanisms, since they have not been established.

The present informal system must be assumed to be less able to deal with more fundamental dilemmas of policy coherence and conflicts between major policy areas, such as those relating to Norway’s overall economic and geopolitical interests or its commitment to the Sustainable Development Goals. If there should be a political will to ensure more coherence between Norwegian policies and actions with regard to finance, trade, environment and security, then informal case-by-case mechanisms would not be sufficient. Several important dilemmas have been addressed in both government and non-government reports on PCD since 2008 and previously, without much being done to do anything about them in practice.

One of the main constraints is the fact that, even though the MFA has been given the task to coordinate and follow up the Government’s work towards PCD, it has not been equipped with any formal power over other ministries’ policies or activities. In addition, no inter-ministerial committees led by the ministers themselves have been established. We know from other countries (such as the UK) that when

such committees are led by the responsible ministers themselves, they can develop policies that are subsequently implemented by several ministries in tandem. Within the Norwegian ministerial “power structure”, the MFA has limited influence. It provides “helping hands” to various Norwegian agencies and interest groups, but does not drive policies. Furthermore, the main formal mechanism that the MFA can use in order to ensure PCD, the annual reporting to Parliament, has not been used for this purpose. In general, it is merely a report on what has been done, and is not used to identify challenges or define goals that can be decided upon politically so they can be monitored and addressed again in the next annual report. Lastly, there is little awareness of the PCD concept within the various government ministries and units, and the term is not actively used in ministerial policy and strategy documents.

5.1.2. Reflections of the efforts at country level in Myanmar

The lack of formal mechanisms to ensure PCD, and the widespread conviction in Norway that informal mechanisms work best, are manifestly reflected in the practice of the Norwegian Embassy and Norwegian actors in Myanmar. The Embassy’s work towards ensuring PCD is carried out in close contact and communication

with stakeholders, including business actors and CSOs, and is geared towards responding to their interests and desires. The “tools” include facilitation of meeting groups for business actors, and development of guidelines for how to operate in Myanmar. However, the awareness of the PCD concept is low, and the term is not used in policy or strategy documents or in the daily policy and activities at the Embassy. The focus of the “tools” mentioned above is primarily towards corporate social responsibility and to “do no harm”.

The Embassy’s staff is confident that the “informality” of the bureaucratic system and the use of informal mechanisms are most suitable for ensuring PCD. Our respondents are reticent towards the idea of overly formalized strategy processes. One of the most important arguments against adopting formal strategies is the concern that formal directives from Oslo would not be based on the contextual knowledge needed to carry out effective activities in a complex country such as Myanmar. Following this, there is no formal system of feedback between the Embassy and the MFA for the purpose of learning from how various dilemmas have been addressed.

There is no formal strategy (i.e. in the form of a document) for Norway’s engagement

in Myanmar. This is likely to have contributed to some misunderstandings between Norwegian and local actors, the latter of which work on the assumption that Norway has a coherent policy so that activities in one domain are meant to underpin activities and interests in another. Certainly, the overall goal of “a democratic and peaceful Myanmar” is well aligned at the Embassy and engagement and activities are considered in a perspective of promoting democracy and peace. Although Norwegian companies and NGOs have other primary objectives in the country, the Embassy staff is clear about the goal that their presence should be seen from the perspective of promoting democracy and peace. The largest Norwegian business actors in the country are seen by the Embassy, as well as by the vast majority of local stakeholders interviewed, as having contributed to sustainable development by lifting the local standards of responsible business and through technology transfer and capacity building. Yet this is not part of any formal strategy.

The main dilemmas of PCD expressed by most actors in Myanmar are of a “strategic” nature, i.e. not related to the goals of the various actors and their activities but rather to the question of how to achieve the goals. The most prominent of these dilemmas at the

time of our evaluation was the question of the conflict in Rakhine State and the treatment of the Rohingya population, and whether Norway should be more vocal in their criticism of the Myanmar Government for the present crisis in Rakhine vs. to continue the cooperation with the Government as previously. It is challenging to balance between criticism and support in such volatile situations. The few Myanmar CSO representatives who raised concern about the Rakhine crisis, expressed disappointment that Norway is not more vocal about the military’s human rights violations and the civilian Government’s inability to respond.

With respect to ensuring PCD, the informality of the Norwegian approach has some obvious weaknesses. It prevents the establishment of formal mechanisms to ensure co-ordination and continuity. Firstly, in the absence of formal co-ordination, neither the Embassy nor any other Norwegian Government unit have the total overview or influence over all Norwegian activities in the country (even government activities). This limits Norway’s capacity to ensure synergy between the various activities. Secondly, the informality of the present system relies heavily on the people who occupy a position at any given time, and particularly on the knowledge and perspectives of the ambassador. With respect to being able

to ensure PCD at the national level in Myanmar, the Embassy is also constrained by the fact that the Embassy's priorities and activities to a large degree are defined by the annual policy instructions given by the Government in Norway, and which do not necessarily reflect any strategic proposals developed at the Embassy. Hence, when PCD is not high on the agenda in the MFA, this means that only a highly forceful and strategically oriented ambassador might be able to ensure PCD in Myanmar.

5.2. RECOMMENDATIONS

A general recommendation from this evaluation is that **more formalized mechanisms should be established to make the present system of ensuring Policy Coherence for Development (PCD) more proactive.** The present system, characterized by informality and flexibility, is primarily reactive in the sense that it is relatively fit for dealing with dilemmas and incoherencies within individual sectors when they have emerged, but less fit for handling potential dilemmas before they emerge and to plan for synergies towards development goals between different sectors and policy areas.

A proactive system will be even more important in relation to the Government's work towards fulfilling its commitment towards Agenda 2030

and the global SDGs in the coming years. Hence, the following specific recommendations to inform the future work on PCD in the MFA should be integrated with Agenda 2030 initiatives whenever possible:

1. Develop awareness of and focus on Policy Coherence for Development (PCD) within all parts of the Government

Awareness of the potential benefits is the cornerstone of any system to ensure PCD. Experience has shown that such systems work best when responsibilities are shared by all government departments and units. The Swedish model of allocating responsibility for PCD to all ministries might serve as an organizational model for a new Norwegian initiative, although the reporting mechanisms might differ.

2. Develop systematic, evidence-based and accountable reporting mechanisms

Accountable and evidence-based monitoring of Policy Coherence for Development (PCD) is an important premise going forward. Monitoring systems do not need to be rigid or based on numerical indicators, but they need to be based on clear goals and an unbiased measurement of progress towards these goals over time. Hence, the identification of challenges (incoherencies) and goals should be seen as

an important exercise. Efforts should be made to re-shape the existing reporting mechanism and format to include: identification of existing and potential dilemmas and incoherencies; definition of clear goals for solving the dilemmas and incoherencies; and balanced and un-biased measures of progress towards the goals.

3. Involve external stakeholders, i.e. civil society, business actors, and academic/-research institutions, in mechanisms for ensuring Policy Coherence for Development (PCD), including in monitoring and reporting mechanisms

By involving external actors in initiatives to ensure PCD, the Norwegian Government may obtain useful external views and capitalize on knowledge gained within various sectors. External actors may be involved in monitoring progress and can contribute to identifying dilemmas and set priorities. The planned dialogue forum on coherence may serve some of these purposes. The Ethical Council of the Norwegian Pension Fund Global provides an example of a way to involve external stakeholders.

4. Promote cross-ministerial dialogue and cooperation

Formal inter-ministerial committees in the most important cases led by a government minister, as well as informal groups and networks, should be developed as tools for ensuring Policy Coherence for Development (PCD), with the aim of developing synergies between different policy areas. A system for exchange of staff between ministries may also be considered.

5. Consider to establish an overarching or cross-departmental unit within the government system with responsibility of promoting and coordinating efforts towards ensuring Policy Coherence for Development (PCD)

It is difficult to see how the Government's efforts to ensure PCD may move from being reactive (responding to "harm") to being proactive (planning for synergies) within the present ministerial system of sectoral responsibility. Establishment of an "independent" cross-sectoral unit is probably a premise for further development of effective efforts to ensure PCD, whether such a unit is only mandated to promote PCD within and between ministries or to direct in cases of emerging dilemmas or incoherencies.

5.2.1. Additional recommendations with special relevance for Myanmar

1. Formulate a strategy that outlines the objectives and the strategic approaches of Norway's engagement in Myanmar

The overall strategy for Norwegian engagement in Myanmar is not clearly documented and Norway has been criticized by many external actors for perceived inconsistencies. In addition to contributing to clarifying priorities and activities and avoiding misunderstandings, a strategy could serve as the cornerstone in a Norwegian effort to promote Policy Coherence for Development (PCD) in Myanmar.

2. Establish a forum of Norwegian NGOs, CSOs and the business sector for strategic discussions on the Sustainable Development Goals (SDGs), Policy Coherence for Development (PCD) and the democratization and peace agenda in Myanmar

Although the Embassy has good informal dialogue with Norwegian actors in Myanmar, a more formal forum for exchange of information, experiences and viewpoints may contribute towards PCD. Such a forum may be used to ensure that all Norwegian business actors and development agencies benefitting from Norwegian government support are trained in conflict sensitivity and the political

context in Myanmar to ensure PCD on the ground. The Swedish Embassy in Myanmar has established such a forum and engages the external actors in its annual process of strategy development.

3. Consider defining coordination related to Policy Coherence for Development (PCD) (in relationship with the follow-up of Agenda 2030 and the SDGs) as a specific working task at the Embassy in Yangon

If PCD coordination was defined as a specific task at the Embassy this would contribute to building awareness of the concept. It could also serve as a driver to gain a better overview of all Norwegian engagement in the country, including projects and activities presently implemented by multilateral and other development actors beyond the purview of the Embassy. Knowledge of activities funded by other Norwegian actors, including government units, or implemented by multilateral organizations, would open up the opportunity to create more synergy between different Norwegian activities. By having PCD coordination as a specific task the Embassy could also promote establishment of formal mechanisms to report on PCD-related issues to the MFA.

Annex 1: Terms of Reference

TERMS OF REFERENCE: EVALUATION OF NORWEGIAN POLICY COHERENCE FOR DEVELOPMENT

Background and rationale

The Organization for Economic Cooperation and Development (OECD) defines policy coherence as “the systematic promotion of mutually reinforcing policy actions across government departments and agencies creating synergies towards achieving the agreed objectives.”

Policy coherence for development is defined in OECD as “ensuring that policies do not harm and where possible contribute to international development objectives.” The development policy shall lead, and other policy areas should ensure to be coherent with this. Within national governments, policy coherence issues arise between different types of public policies, between different levels of government, between different stakeholders (both state and non-state, commercial and non-commercial) and at an international level between different countries.

The current Norwegian government has declared that they will pursue an “integrated development policy, in which measures within the various sectors point in the same direction to the greatest possible degree”.⁴⁴ The Sustainable Development Goals, to which Norway is committed, has a target that all countries should enhance policy coherence for sustainable development.⁴⁵ Following the recommendations from a policy coherence commission in 2008, the government established a system of annual reporting on the coherence between the government’s development policy and other policy areas, as part of its budget proposals to the Parliament.⁴⁶ The Ministry of Foreign Affairs (MFA) is responsible for the development policy, and has the responsibility to coordinate this report.

44 Sundvolden declaration, October 2013: https://www.regjeringen.no/contentassets/a93b067d9b604c5a82bd3b5590096f74/politisk_platform_eng.pdf.

45 OECD DAC has a framework for Policy Coherence for Sustainable Development that provides guidance on how to track progress on PCSD, in relation to 17.14 of the SDGs: <http://www.oecd.org/pcd/pcsd-framework.htm>

46 NOU 2008:14. *Samstemt for utvikling? – Hvordan en helhetlig norsk politikk kan bidra til utvikling i fattige land*. Norges Offentlige Utredninger.

OECD Development Assistance Committee’s (DAC) peer reviews assess how different countries perform in relation to policy coherence. Each DAC member country is peer reviewed roughly every five years.⁴⁷ The two last peer reviews of Norway, in 2008 and 2013, recommended MFA to commission longer-term studies to analyze potential areas of policy conflict in order to have solid evidence to underpin discussions with other ministries.⁴⁸ The peer reviews of Norway have criticized the yearly coherence reports for not contributing to actual changes in policies, apart from the debate they create when they are presented to the Parliament. The reports have also been criticized by the civil society of being subject to agreement among all ministries, which may result in more critical issues not being addressed.⁴⁹

47 <http://www.oecd.org/dac/peer-reviews/>.

48 OECD (2013). *OECD Development Co-operation Peer Review: Norway 2013*. Paris: OECD.

49 The Norwegian Church Aid are conducting biannual reports on Norway’s policy coherence for development. The latest report is from September 2016: *Kirkens Nødhjelp (rapport 03/2016). Fortsatt Ustemt. Hvordan norsk politikk kan bli mer samstemt for utvikling*. Oslo: 2016. An annual index, produced by Centre for Global Development, ranks 27 of the world’s richest countries on policies that affect people living in poorer countries. Norway was ranked no. 6 in 2016 <http://cgdev.org/commitment-development-index>.

On this background, the evaluation department is conducting an evaluation of MFA's efforts to ensure policy coherence for development. Myanmar is selected as a case to assess the practical implications of how this plays out at country level, what the potential dilemmas in the intersection between objectives of the development policy and other policy areas are, and how these have been addressed by Norwegian actors. Myanmar is one of the priority countries for Norwegian Official Development Assistance (ODA), and an increasing number of actors, both traditional and non-traditional development actors, are engaged in the country.

Myanmar has developed from being one of the world's most isolated and closed countries, subjected to extensive sanctions by other countries, to a country with significant economic growth. The Norwegian ODA to Myanmar has increased significantly over the past ten years, from 51.6 million NOK in 2006 to 228.5 million NOK in 2015. While most of the support before 2008 was related to humanitarian assistance through civil society, more long-term development cooperation has been taking over. The Norwegian Diplomatic Mission in Yangon, Myanmar was established in 2012, and upgraded to Embassy in 2013. The two major components of the development

cooperation are 1) peace, democracy and reform, and 2) sustainable management of natural resources, energy and environment/-climate change.⁵⁰

During the last five years, several Norwegian private sector companies have engaged in the country. Telenor, Statoil, SN Power, Yara and Jotun have either signed contracts and started the work, signed MoUs or started conversations with the Myanmar government within their respective areas. With many and different actors engaged (state and non-state, commercial and non-commercial), there might be a risk that different interests and priorities pull in different directions. Norway was early engaged in the country and with the gradually increased presence by a variety of actors, there are opportunities to ensure policy coherence for development.

Purpose and objectives

The main purpose of the evaluation is to contribute to increased knowledge about:

- › The initiatives done by the Ministry of Foreign Affairs and other Norwegian development actors to ensure policy coherence for development

⁵⁰ The numbers for 2016 will be ready in early April 2017: <https://www.norad.no/en/front/toolspublications/norwegian-aid-statistics/?tab=geo>.

- › The dilemmas in relation to the intersection between objectives of the development policy and other policy areas, and how these have been addressed by Norwegian actors

Another purpose is to learn from experiences at country level.

The evaluation results may be used to inform MFA's future work to ensure policy coherence for development. The main users of the evaluation are the MFA and other ministries with policies relevant for developing countries, the Norwegian Embassy in Myanmar, Norad, the Parliament, NGOs and other stakeholders like private companies operating in developing countries. The evaluation might also contribute to the debate on policy coherence for development in general.

The objectives of the evaluation are to:

- › Map and describe initiatives by MFA to ensure policy coherence for development. This also includes to map all Norwegian stakeholders in relation to policy coherence for development
- › Identify and analyze dilemmas in the intersection between objectives of the development policy and other policy areas

- › Analyze how these dilemmas have been addressed by MFA and other Norwegian development actors
- › Assess MFA's efforts to ensure policy coherence for development against best practices as described in OECD guidelines for policy coherence for sustainable development or other relevant guidelines
- › Formulate lessons learned from the Norwegian engagement in Myanmar and provide recommendations on how to work with policy coherence for development in the future

Scope

The evaluation will use the OECD definition of policy coherence for development referred above. The time period for the evaluation is from 2008 until the start of the evaluation. The starting point in 2008 is related to the commitment by the government towards policy coherence for development since then.

The evaluation will include all Norwegian engagement in Myanmar affecting the development policy. The engagement in Myanmar in the period of the evaluation may be divided into three phases. During this period, the Norwegian support has changed

from mainly going through exile organizations, to supporting organizations inside the country.

- › **Prior 2008:** At the height of internal conflict and violence, Norway engaged with local partners promoting political reform. At the same time, it worked with exile organizations promoting change from outside of Myanmar.
- › **2008–2012:** After cyclone Nargis in 2008, Norway gradually provided more aid to organizations based in the country.
- › **2013– :** The Diplomatic Mission was established. Long-term assistance was initiated. Several NGOs now have permanent presence in Myanmar/or travels there regularly. Norwegian private sector companies have been present since 2013.

Although the evaluation is limited to one case study, the evaluation will try to identify lessons learned that can also be useful for comparable situations and contexts elsewhere.

Evaluation object

The evaluation object is MFA's efforts to ensure policy coherence for development. The development policy is the responsibility of the MFA, and it is MFA's responsibility to ensure a holistic foreign policy. The entry

point is therefore MFA, but the evaluation will necessarily involve stakeholders from other ministries and non-state actors, both NGOs and private sector companies.

Possible approach

The evaluation will map and describe what concrete initiatives MFA and other development actors have done to ensure policy coherence for development. The evaluation will identify and analyze dilemmas in the intersection between objectives of the development policy and other policy areas. Some potential dilemmas between different policy objectives might be:

- › how to address potential conflicts of interest between the Norwegian government's development objectives, trade objectives, the private sector's commercial objectives and the development objectives of the Myanmar government?
- › how to address a potential tension between contributing to conflict prevention/peace- and state-building on one side and the objective to promote and protect human rights and good governance on the other?

The evaluation team is expected to further identify and elaborate on dilemmas of relevance for the evaluation.

In Myanmar, the evaluation will map all Norwegian actors engaged, including the degree of Norwegian official support to these actors (both financial and other support), and their relevance for development policy objectives.

The evaluation will analyze, interpret and discuss decisions made by Norwegian actors in different phases of the engagement in light of the knowledge and opportunities available at the time, in relation to the identified dilemmas.

Evaluation questions

The following evaluation questions will guide the evaluation:

1. How does MFA ensure policy coherence for development?

- a. What concrete initiatives have MFA and other development actors done to ensure policy coherence for development?
- b. What are potential dilemmas in the intersection between objectives of the development policy and other policy areas?
- c. How does MFA's efforts to ensure policy coherence for development compare with best practices as described in guidelines by OECD or others?

2. How does MFA's work with policy coherence for development play out in Myanmar in the period of the evaluation?

- a. What were Norwegian development policy objectives, what were other policy objectives, and what were the interests of Norwegian actors in Myanmar? Where these coherent?
- b. What were the dilemmas in relation to policy coherence for development?
- c. How were these dilemmas addressed? How did the actors assess different options in different phases related to these dilemmas?
- d. Is there a system of feedback from country to MFA level in order to learn from potential dilemmas and how these have been addressed?

3. What are the main lessons learned and recommendations to inform the future work on policy coherence for development in MFA?

Methodology

The evaluation team will propose an outline of a methodological approach that optimizes the possibility of producing evidence-based assessments. All parts of the evaluation shall adhere to recognized evaluation principles and the OECD DAC's quality standards for development evaluation, as well as relevant guidelines from the Evaluation Department. The evaluation should be utilization-focused. The methodological approach could:

- › Rely mainly on qualitative methods such as process tracing analysis or a historical interpretative approach, understanding actions, statements and policy objectives in their historical context and in line with established values norms and traditions at the time.
- › Rely on a cross-section of data sources to ensure triangulation of information through a variety of means.
- › Where possible use quantitative data (i.e. size of funds, number of staff, number of projects).
- › Be synthesized in an evaluation matrix, which should be used as the key organizing tool for the evaluation.

The conclusions should be substantiated by existing research, evaluations, and best practices related to policy coherence for development.

The evaluation team may propose a methodological approach that can trace processes in relation to decisions made at different points in time. Patterns should be detected in order to learn and generate lessons that can be useful for similar work in the future.

The evaluation team may propose an alternative approach that responds to the purpose and objectives in this Terms of Reference in other ways than those laid out above, demonstrating comparable rigor and ability to respond to the evaluation questions.

Challenges and limitations

A challenge in this evaluation is that policy coherence for development is a cross government affair, even though the responsibility for the development policy is with MFA.

The evaluation will involve several stakeholders that are not traditional development actors, like other ministries, state-owned and private sector companies. It will be important for the evaluation team to plan for sufficient time to map all and interview relevant stakeholders both in Oslo and in Myanmar.

Ethics

The evaluation process itself should be conflict sensitive. The evaluation process should show sensitivity and respect to all stakeholders.

The evaluation shall be undertaken with integrity and honesty and ensure inclusiveness of views. The rights, dignity and welfare of participants in the evaluation should be protected. Anonymity and confidentiality of individual informants should be protected. An introductory statement to the evaluation report may explain what measures were or were not taken to ensure no harm/conflict sensitivity of the evaluation itself, as well as the security of the interviewees.

Organization of the evaluation

The evaluation will be managed by the evaluation department, Norad. The evaluation team will report to the evaluation department through the team leader. The team leader shall be in charge of all deliveries and will report to the evaluation department on the team's progress, including any problems that may jeopardize the assignment. The evaluation department and the team shall emphasize transparent and open communication with the stakeholders. Regular contact between the evaluation department, team and stakeholders will assist in discussing any arising issues and ensuring a participatory process. All decisions

concerning the interpretation of this Terms of Reference, and all deliverables are subject to approval by the evaluation department.

The team should consult widely with stakeholders pertinent to the assignment. In some evaluations, the evaluation department participates in parts of the field visits to better understand the context of the evaluation. This might also be discussed for this evaluation. Stakeholders will be asked to comment on the draft inception report and the draft final report. In addition, experts or other relevant parties may be invited to comment on reports or specific issues during the process. The evaluation team shall take note of all comments received from stakeholders. Where there are significant divergences of views between the evaluation team and stakeholders, this shall be reflected in the final report. Quality assurance shall be provided by the institution delivering the consultancy services prior to submission of all deliverables. Access to archives and statistics will be facilitated by Norad and stakeholders.

Budget and deliverables

The evaluation will be budgeted with up to 150 days of work. The deliverables consist of the following outputs:

- › Inception report not exceeding 20 pages, excluding annexes
- › Exit workshop Myanmar, presenting initial findings at field level
- › Draft report. After circulation to the stakeholders, the Evaluation department will provide feedback
- › Workshop on draft findings and conclusions to inform recommendations in Oslo
- › Final report not exceeding 25,000 words (approx. 40 pages) excluding summary and annexes
- › Presentation at a seminar in Oslo
- › Policy brief on a topic identified during the evaluation process, not exceeding 4 pages

All reports shall be prepared in accordance with the Evaluation Department's guidelines and shall be submitted in electronic form in accordance with the progress plan specified in these Terms of References or later revisions. The Evaluation department retains the sole rights with respect to distribution, dissemination and publication of the deliverables.

Phases and deadlines

The evaluation will be organised into four work phases; (i) inception phase; (ii) country visits and interviews; (iii) analysis and report writing; and (iv) dissemination. The main parts will be carried out over the period June 2017 – January 2018, while dissemination is planned for February 2018. Please refer to deadlines in the tender document.

Annex 2: List of interviews

MFA and Norwegian Government		Date of interview
Svein Åge Dale (retired)	Former Ministry of Foreign Affairs (MFA)	28 November 2017 Additional e-mail communication 4 and 7 January 2018
Asbjørn Eidhammer (retired)	Former, Norad, Ministry of Foreign Affairs (MFA), Ambassador	16 November 2017
Katja Nordgaard	Ministry of Foreign Affairs (MFA)	16 November 2017
Inge Herman Rydland	Ministry of Foreign Affairs (MFA)	28 November 2017
Leiv Lunde	Ministry of Foreign Affairs (MFA)	20 November 2017
Arne Jan Flølo	Ministry of Foreign Affairs (MFA)	19 January 2018
Einar Rystad	Ministry of Foreign Affairs (MFA)	19 January 2018
Hilde Haraldstad (e-mail)	Ministry of Foreign Affairs (MFA), Former Myanmar Coordinator	21 January 2018
Norwegian NGOs/civil society		Date of interview
Ingeborg Moa	Norwegian People's Aid (NPA)	11 January 2018
Claudio Feo	Norwegian People's Aid (NPA)	11 January 2018
Borghild Tønnessen-Krokan	Forum	9 October 2018
Silje Hagerup	Forum	9 October 2018
Knut Hjelleset	RORG	9 October 2018
Arnfinn Nygård	RORG	9 October 2018
Arvinn Gadgil	Norwegian Refugee Council (NRC)	16 November 2017



Other Individuals		Date of interview
Linn Herning		20 November 2017
Gunstein Insteffjord		24 November 2017
Politicians		Date of interview
Anniken Huitfeldt	AP (Labour party)	18 December 2017
Hilde Frafjord Johnson	KrF (Christian Democrats)	24 November 2017
Sigbjørn Aanes	Prime Minister's Office (SMK)	19 December 2017
Business Actors		Date of interview
Torger Lien (e-mail)	CEO, SN Power	8 January 2018
Elsbeth Tronstad (e-mail)		8 January 2018

INTERVIEWS FOR THE MYANMAR COUNTRY CASE

Diplomats		Date of interview
Tone Tinnes	Ambassador	21 October 2017
Harald W Mathisen	Norwegian Embassy	20, 26 October 2017
Lise Nordgaard	Norwegian Embassy	20, 26 October 2017
Morten Nergaard Rezende	Norwegian Embassy	20, 26 October 2017
Ann Stödberg	Swedish Embassy	25 October 2017
Claudine Haenni	Swiss Embassy	26 October 2017





Norwegian NGOs		Date of interview
Marte G Jenssen	Norwegian People's Aid (NPA)	23 October 2017
Andreas Indregard	Former Norwegian People's Aid (NPA)	25 October 2017
Prasant Naik	Norwegian Refugee Council (NRC)	24 October 2017
Kendra Hughbanks	Norwegian Refugee Council (NRC)	24 October 2017
Andreas Kiaby	Danish Church Aid - Norwegian Church Aid (DCA-NCA)	23 October 2017
Eva Østbye	CDA Collaborative Learning Projects	21 October 2017
Audun Aagre	Norwegian Burma Committee (NBA)	3 December 2017
Analysts		Date of interview
Thant Myint U		7 December 2017
Richard Horsey		20 October 2017
Mael Raynaud		23 October 2017
Myanmar Organizations		Date of interview
Khin Maung Win	Democratic Voice of Burma (DVB)	23 October 2017
All main partner organizations of Norwegian NGOs in Myanmar		
Norwegian Business actors in Myanmar		Date of interview
U Tin Myo Win	Head of National Reconciliation and Peace Center (NRPC)	21 October 2017
U Soe Thane	Former Minister, President's Office	22 October 2017
U Hla Maung Shwe	National Reconciliation and Peace Center (NRPC)/ Myanmar Peace Center (MPC)/Myanmar Egress	21 October 2017
Norwegian Business actors in Myanmar		Date of interview
Ola Nicolai Borge	Myanmar-Norway Business Council	27 October 2017 Additional e-mail communication 8 January 2018

Annex 3: References and document sources

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Prop. 30 S (2014-2015) Endringer i statsbudsjettet 2014 under Utenriksdepartementet – Tilråding frå Utenriksdepartementet 21. november 2014, godkjend i statsråd same dagen. (Regjeringa Solberg)

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Acronyms

BD	Beslutningsdokument (Decision Document)	INTPOW	Norwegian Renewable Energy Partners	PCSD	Policy Coherence for Sustainable Development
CDG	Center for Global Development	INTSOK	Norwegian Oil and Gas Partners	PDSG	Peace Donor Support Group
CDI	Commitment to Development Index	JD	Justice Department	PM	Prime Minister
CSO	Civil Society Organizations	KOMPakt	The government's consultative body on matters related to corporate social responsibility	RORG	RammeavtaleORGanisasjoner (Network of organizations with a framework agreement (rammeavtale) for multi-year funding for development education with the Norwegian Agency for Development Cooperation (Norad)
CSR	Social Corporate Responsibility	KrF	Kristelig Folkeparti/Norwegian Christian Democratic Party	SDG	Sustainable Development Goals
DAC	Development Assistance Committee	MFA	Ministry of Foreign Affairs	SIDA	Swedish International Development Cooperation Agency
DEAC	Department of Effectiveness and Coherence (the Netherlands)	MPSI	Myanmar Peace Support Initiative	WB	World Bank
DIFI	Direktoratet for forvaltning og ikt (The Directorate for Management and ICT)	NATO	North Atlantic Treaty Organization	WTO	World Trade Organization
ecdpm	The European Centre for Development Policy Management	NCA	Norwegian Church Aid		
Forum	Forum for Development and the Environment (Umbrella organization for CSOs working with matters related to development and environment)	NGO	Non-Governmental Organizations		
GIEK	The Norwegian Export Guarantee Agency	NICFI	Norway's International Climate and Forest Initiative		
GPIFG	Government Pension Fund Global	NTPOW	Norwegian Renewable Energy Partners		
GSP	Generalized Scheme of Preferences	NLD	National League for Democracy		
IDP	Internally Displaced Person(s)	Norad	Norwegian Agency for Development Cooperation		
IMF	International Monetary Fund	NORWEP	Norwegian Energy Partners (NTPOW and INTSOK)		
IN	Innovation Norway	OECD	Organization for Economic Cooperation and Development		
INGO	International Non-Governmental Organization	PCD	Policy Coherence for Development		

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- 8.16 Country Evaluation Brief: Mozambique
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- 6.15 Evaluation Series of NORHED Higher Education and Research for Development. Evaluation of the Award Mechanism
- 5.15 Basis for Decisions to use Results-Based Payments in Norwegian Development Aid
- 4.15 Experiences with Results-Based Payments in Norwegian Development Aid

- 3.15 A Baseline Study of Norwegian Development Cooperation within the areas of Environment and Natural Resources Management in Myanmar
- 2.15 Evaluation of Norway's support to women's rights and gender equality in development cooperation
- 1.15 Evaluation of the Norwegian Investment Fund for Developing Countries (Norfund)
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- 4.13 Evaluation of Five Humanitarian Programmes of the Norwegian Refugee Council and of the Standby Roster NORCAP
- 3.13 Evaluation of the Norway India Partnership Initiative for Maternal and Child Health
- 2.13 Local Perception, Participation and Accountability in Malawi's Health Sector
- 1.13 A Framework for Analysing Participation in Development
- 2012**
- 9.12 Evaluation of Norway's Bilateral Agricultural Support to Food Security
- 8.12 Use of Evaluations in the Norwegian Development Cooperation System
- 7.12 A Study of Monitoring and Evaluation in Six Norwegian Civil Society Organisations
- 6.12 Facing the Resource Curse: Norway's Oil for Development Program
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- 4.12 Evaluation of the Health Results Innovation Trust Fund
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- 13.10 Evaluation: Real-Time Evaluation of Norway's International Climate and Forest Initiative. Country Report: Brasil
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- 10.10 Evaluation: Democracy Support through the United Nations
- 9.10 Study: Evaluability Study of Partnership Initiatives
- 8.10 Evaluation: Evaluation of Transparency International
- 7.10 Evaluation: Evaluation of Norwegian Development Cooperation with the Western Balkans
- 6.10 Study: Evaluation of Norwegian Business-related Assistance Uganda Case Study

- 5.10 Study: Evaluation of Norwegian Business-related Assistance Bangladesh Case Study
- 4.10 Study: Evaluation of Norwegian Business-related Assistance South Africa Case Study
- 3.10 Synthesis Main Report: Evaluation of Norwegian Business-related Assistance
- 2.10 Synthesis Study: Support to Legislatures
- 1.10 Evaluation: Evaluation of the Norwegian Centre for Democracy Support 2002–2009

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- 6.08 Evaluation: Evaluation of Norwegian Development Cooperation in the Fisheries Sector
- 5.08 Evaluation: Evaluation of the Norwegian Research and Development Activities in Conflict Prevention and Peace-building
- 4.08 Evaluation: Evaluation of Norwegian HIV/AIDS Responses
- 3.08 Evaluation: Mid-term Evaluation the EEA Grants
- 2.08 Evaluation: Joint Evaluation of the Trust Fund for Enviromentally and Socially Sustainable Development (TFESSD)
- 2.08 Synthesis Study: Cash Transfers Contributing to Social Protection: A Synthesis of Evaluation Findings
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