

EVALUATION

EVALUATION OF THE FINNISH DEVELOPMENT POLICY
INFLUENCING IN THE EUROPEAN UNION

Volume 1 • Main Report



Ministry for Foreign
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Evaluation of Finland's Development Policy and Cooperation

2022/5a



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Volume 1 – Main Report

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Acronyms and Abbreviations

ACP	African, Caribbean and Pacific
COAFR	EU Working party on Africa
CODEV	EU Working Party on Development Cooperation and International Partnerships
COHAFA	EU Working party on Humanitarian Aid and Food Aid
COHOM	EU Working party on Human Rights
COREPER	Comité des Représentants Permanents
COVAX	COVID-19 Vaccines Global Access
DG DEVCO	Directorate General for International cooperation and Development (now DG INTPA)
DG ECHO	Directorate General for European Civil Protection and Humanitarian Aid Operations
DG INTPA	Directorate-General for International Partnerships
DG NEAR	Directorate General for Neighbourhood and Enlargement Negotiations
DGT	Directorate-General for Translation
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EDF	European Development Fund
EEAS	European External Action Service
EFSD+	European Fund for Sustainable Development Plus
EIB	European Investment Bank
EPA	Economic Partnership Agreement
EQ	Evaluation Question
EU	European Union
EUD	Delegation of the EU
EUE	Finland's Permanent Representation to the European Union in Brussels
EUR	Euro
FD	Forced Displacement
FINGO	Finnish Development NGOs
FLEGT	Forest Law Enforcement, Governance and Trade
GAP	Gender Action Plan
GCCA+	Global Climate Change Alliance+
GDP	Gross Domestic Product
GESI	Gender Equality and Social Inclusion
GIZ	German Agency for International Cooperation
GPE	Global Partnership for Education
HR/VP	High Representative / Vice President of the EU
HRBA	Human rights-based approach
IFIs	International Financial Institutions
JC	Judgement criterion
KEO-10	MFA Unit for Development Policy
KPO-10	MFA Trade Policy Unit
KPT	Finnish Development Policy Committee
LGBT	Lesbian, gay, bisexual and transgender
MEL	Monitoring, Evaluation and Learning
MFA	Ministry for Foreign Affairs, Finland
MFF	Multiannual Financial Framework
MIP	Multiannual Indicative Programme



MS	Member States
NDICI	Global Europe: Neighbourhood, Development and International Cooperation Instrument
NGO	Non-governmental organisation
ODA	Official development assistance
OECD	Organisation for Economic Cooperation and Development
OECD-DAC	OECD Development Assistance Committee
PCD	Policy Coherence for Development
POL-30	Unit for European Common Foreign and Security Policy
RVWRMP	Rural Village Water Resources Management Project in Nepal
SDG	Sustainable Development Goal
SGUA	EC Support Group for Ukraine
SRHR	Sexual and Reproductive Health and Rights
SST	Small States Theory
TEI	Team Europe Initiative
TFEU	Treaty on the Functioning of the European Union
UK	United Kingdom
UN	United Nations
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNFCCC	United Nations Framework Convention on Climate Change
UNFPA	United Nations Population Fund
USD	US Dollar
VTV	Finnish National Audit Office
WASH	Water, Sanitation and Hygiene



Yhteenveto

Evaluoinnin tarkoitus, tavoitteet ja menetelmät

Ulkoministeriön kehitysevaluoinnin yksikön (EVA-11) tilaamassa strategisessa evaluoinnissa tarkasteltiin Suomen kehityspoliittista vaikuttamista Euroopan Unioniin (EU). Evaluoinnin **tarkoituksena** oli selvittää ulkoministeriön EU:n ja sen toimielimiin kohdistaman vaikuttamisen tarkoituksenmukaisuutta, tuloksellisuutta ja johdonmukaisuutta. Evaluointi pyrkii tukemaan ministeriön kokemuseräistä oppimista ja monenvälisen vaikuttamisen tuloksellisuutta.

Evaluoinnilla oli kolme **päätaavoitetta**. Ensimmäiseen päätaavoitteeseen sisältyi useita osioita. Ensimmäkin arvioitiin Suomen onnistumista Agenda 2030 -toimintaohjelman, ja COVID-19 -pandemian elpymistoimien ilmastoystävällisyyden ja kestävyuden (Building Back Better and Greener) edistämässä. Lisäksi arvioitiin vaikuttamistyön onnistumisesta Suomen kehityspoliittisten tavoitteiden sekä jäsenvaltioiden yhteisten kehitysyhteistyökäytänteiden ja -periaatteiden edistämässä. Toinen päätaavoite oli tarkastella vaikuttamistoimien tuloksellisuutta eri keinojen ja kanavien osalta sekä keskittyen erityisesti EU-vaikuttamistyön mahdollisuuksia nykyisten henkilö- ja taloudellisten resurssien puitteissa. Kolmantena päätaavoitteena oli analysoida tekijöitä, jotka vaikuttavat EU-vaikuttamistyön tuloksiin myönteisesti tai kielteisesti.

Tulevaisuuteen suuntautuvan evaluoinnin avulla pyrittiin tuottamaan näkemyksiä parhaista vaikuttamisen ja osallistumisen mahdollisuuksista ja tavoista, liittyen erityisesti EU:n uuteen ulkosuhderahoitusvälineeseen (NDICI) ja muuttuvaan kehitysyhteistyökenttään. Lisäksi keskityttiin siihen, miten ministeriö ja muut sidosryhmät voisivat kehittää käytäntöjään maksimoidakseen tulevaisuuden vaikuttamisensa EU:ssa käytettävissä olevien resurssiensa puitteissa.

Evaluoinnissa hyödynnettiin vaikutusketjujen hahmottamiseen **muutosteoria -lähestymistapaa**. Prosessissa tarkasteltiin ulkoministeriön toiminnan ja EU:n kehityspolitiikan strategisessa suunnittelussa sekä täytäntöönpanossa aikaansaatuja – tai odotettuja – muutosten välisiä suhteita. Muutosteorian avulla tehtiinkin siis näkyviksi vaikuttamistoiminnan vaiheet ja niiden suhde toisiinsa ja tuloksiin. Evaluointi keskittyi kolmeen keskeiseen kysymykseen, jotka käsittelevät muutosteorian osia joko tuotos- tai tulostasolla. Lähestymistavan kehittämisessä käytettiin myös aikaisempia evaluointiraportteja ja tutkimuksia, kuten pienet valtiot-teoriaa (Small States Theory).

Evaluointi oli kaksiosainen. Ensimmäinen osa keskittyi tarkastelemaan ulkoministeriön vaikuttamistoiminnan järjestäytymistä ja vaikuttamisen prosessia (evaluointikysymykset 1 ja 2). Toinen osa tarkasteli vaikuttamisella saatuja tuloksia (evaluointikysymys 3) ja sen toteutuksessa hyödynnettiin **muutosharavointimenetelmää (Outcome Harvesting)**. Prosessi aloitettiin tunnistamalla vaikuttamistyön tuloksia ja sitten tutkittiin, millä tavoin ne oli saavutettu. Toisen vaiheen toteutukseen sisältyi myös analyysi EU-vaikuttamista mahdollistavista ja hankaloittavista tekijöistä.



Virallisten asiakirjojen ja muun avoimen lähdetiedon lisäksi evaluoinnissa tarkasteltu materiaali sisälsi:

- Yli sata erityisesti Helsingissä ja Brysselissä toteutettua puolistrukturoitua ulkoministeriön, EU-instituutioiden ja jäsenmaiden edustajien **haastattelua**;
- Kaksi maakohtaista **tapaustutkimusta** (Nepal ja Tansania) ja näitä täydentävä pienimuotoinen Ukraina-tapaustutkimus¹;
- Kolme **prosessitapaustutkimusta**, jotka tarkastelivat arviointijaksolle sijoittuneita keskeisiä vaikuttamismahdollisuuksia. Nämä olivat Suomen EU-puheenjohtajuus vuonna 2019, EU:n ulkosuhderahoitusväline-neuvottelut (NDICI) ja COVID-19 -pandemian vastineeksi luodun Team Europe -aloitteiden rakentaminen;
- Suomen kokemuksia EU:n vaikuttamisesta kuuteen muuhun EU:n pieneen tai keskisuureen jäsenvaltioon (Belgia, Tanska, Irlanti, Puola, Portugali ja Ruotsi) peilaava **vertaisarviointi**;
- Suomen EU-vaikuttamista koskevia näkemyksiä kartoittanut **kyselytutkimus**, joka lähetettiin 13 Suomen edustuston ja 17 (14 kumppanimaata edustavaan) EU-edustuston henkilöstön jäsenelle;
- Viisi **temaattista tiivistelmää**, joissa kiteytettiin EU:n vaikuttamisen edistyminen keskeisillä Suomen kehityspolitiikan painopistealueilla (sukupuolten välinen tasa-arvo, hallinto ja ihmisoikeudet, vammaisten henkilöiden oikeudet, koulutus ja ilmastonmuutos).

Arviointiprosessissa painotettiin institutionaalisin seikkoihin liittyvien tietojen keräämistä, jotta saatu tieto vaikuttamisen tuloksellisuudesta pystyttiin asettamaan oikeaan asiayhteyteen. Analyysissä on huomioitu ajalliset tekijät ja niiden mukaiset Suomen kehityspolitiikan painopisteiden muutokset.

Vastaukset arviointikysymyksiin

Kysymys 1. Missä määrin ulkoministeriön johtamistavat, järjestelyt, prosessit ja työkalut mahdollistavat vaikuttamisen EU:n kehityspolitiikkaan ja yhteistyöhön?

Tiivistetty vastaus: Ulkoministeriön EU-vaikuttamisstrategiat ovat linjassa Suomen kehityspolitiikan kanssa ja yleisesti hyvin ymmärrettäviä. Ne kuitenkin näyttävät monimutkaisina, eivätkä aina ole painopisteiden osalta selkeästi määriteltyjä tai riittävän kaukokatseisia. Henkilöstön tekemän vaikuttamistyön seurantaan ei ole käytössä kattavaa mekanismia. Vaikka hyviä esimerkkejä joustavistakin ratkaisuista löytyy, ajoittain henkilöresurssien käyttö on viety selkeästi äärimilleen. Suomi käyttää rajallisesti hyväkseen EU-rahoituksen tarjoamaa taloudellista vipuvaikutusta. Ulkopuolisten näkemykset koskien ulkoministeriötä organisaationa ja sen henkilöstön osaamista sekä ammattitaitoa ovat myönteisiä. Sen sijaan ministeriön sisäiset näkemykset rooleista ja vastuista ovat ristiriitaisempia. Evaluoinnissa tunnistettiin hyviä esimerkkejä vaikuttamistoimien epävirallisesta ja tapauskohtaisesta raportoinnista, mutta todettiin, ettei vakiintunutta seurannan, arvioinnin ja oppimisen järjestelmää ole vaikuttamistyön osalta käytössä.

¹ Evaluoinnissa oli suunniteltu tehtäväksi myös Ukrainasta täysimuotoinen tapaustutkimus, mutta Venäjän hyökkäyssodan Ukrainaan takia tapaustutkimuksen laajuudesta jouduttiin tinkimään.



Kysymys 2. Missä määrin ulkoministeriö on tarkoituksenmukaisella, johdonmukaisella ja tehokkaalla tavalla onnistunut edistämään kehityspoliittisia tavoitteitaan ja periaatteitaan toiminnassaan ja suhteissaan EU:n kanssa?

Tiivistetty vastaus: Suomen EU-vaikuttamisen prosessi on tarkoituksenmukainen, johdonmukainen ja kohtuullisen tehokas sekä sujuva. Kehityspoliittisen vaikuttamisen käytännön toteutus toimii pääpiirteittäin hyvin ja Suomi hyödyntää tehokkaasti edunvalvontatyön mahdollisuudet ja mekanismit. Suomi työskentelee unionin jäsenmaiden samanmielisten ryhmien ja yhteenliittymien kanssa erityisen laajasti ja tuloksettaasti sekä rakentaen että ylläpitäen niitä tarpeen mukaan. Suomen nähdään olevan erittäin taitava koalitioiden rakentamisessa ja tekevän hyvää yhteistyötä myös Euroopan komission kanssa. Komissiossa Suomi nähdäänkin rakentavana, asioihin käytännönläheisesti suhtautuvana ja sääntöjen mukaan toimivana jäsenenä. Komission näkemyksen mukaan Suomi omista vahvoista linjoistaan kiinni pitäen pyrkii yksimieliseen päätöksentekoon ja on myös valmis tekemään myönnytyksiä.

Jäsenmaiden ja EU:n toimielinten edustajat pitivät suomalaisten virkamiesten työskentelytapoja myönteisinä. Suomalaiset nähtiin myös hyvin organisoituina ja valmistautuneina, ammattitaitoisina, rehellisinä sekä erittäin helposti lähestyttävinä. Niin ikään Suomen pitkäjänteistä ja jatkuvasti kehittyvää lähestymistapaa ja vankkaa kokemusta arvioitiin myönteisesti. Suomi on rakentanut itsestään myönteisen kuvan kehitysyhteistyössä.

Evaluoinnin tarkastelujaksolle sijoittunut Suomen EU-puheenjohtajuus oli ulkoministeriön henkilöstölle merkittävä tilaisuus osoittaa organisointikykyään, mistä tämä saikin laajaa kiitosta. Suomi osallistuu säännöllisesti ja aktiivisesti EU:n hallintoelinten toimintaan, olipa kyse sitten Brysselissä olevista työryhmistä tai muista EU-koordinaatioryhmistä Euroopassa ja kumppanimaissa.

Suomen kannat kehityspoliittisissa kysymyksissä ovat yleisesti tiedossa ja sillä on tunnustettu johtava sekä vaikuttava rooli erityisesti sukupuolten välisen tasa-arvon, ihmisoikeusperustaisen lähestymistavan, ja sosiaalisen osallisuuden edistäjänä sekä Afrikan tukemiseen keskittyneenä toimijana. Näiden temaattisten painopistealueiden lisäksi metsätalous ja koulutus ovat aloja, joilla Suomen asiantuntemus on laajalti tunnettu ja arvostettu. Vaikka Suomen tietotaito tunnustetaan myös vammaisten henkilöiden oikeuksiin liittyvissä asioissa, se on kuitenkin vähemmän näkyvää. Tämä saattaa osittain selittyä sillä, että vammaisten henkilöiden oikeuksia ajavassa työssä on nojattu vähemmän koalitioiden muodostamiseen verrattuna esimerkiksi sukupuolten välistä tasa-arvoa ajaviin vaikuttamistoimiin. Suomi ei ole profiloitunut näkyvästi myöskään ilmastonmuutokseen liittyvään työhön vaikuttamisessa. Tämä selittyy osittain sillä, että Suomen ilmastodiplomatia on vahvistunut EU:ssa vasta hiljattain eikä suuri osa siitä osunut tämän arvioinnin kattamalle tarkastelujaksolle.

EU:n rahoituspäätöksistä kumppanimaatasolla nousi esille joitakin sellaisia tapauksia, jotka ovat olleet selkeästi Suomen kehityspoliittikan mukaisia. Näistä esimerkkejä ovat EU:n delegoitu yhteistyörahoitus Suomen Kaukolännen vesivarantohankkeelle Nepalissa, ja Tansania, jossa EU:n viimeisin monivuotinen ohjelmakehitys (MIP) on linjassa Suomen prioriteettien kanssa. Suurten pitkän aikavälin kehityspoliittisten vaikutusten kannalta tärkein Suomen linjan mukainen EU:n rahoituspäätös evaluointijaksolla oli EU:n kehitysrahoituksen säilyttäminen aiempaa vastaavalla tasolla EU:n uudessa monivuotisessa rahoituskehityksessä (2021–2027).



Kysymys 3. Missä määrin ulkoministeriö on onnistunut saavuttamaan vaikutustavoitteitaan EU:ssa Suomen kehityspolitiikan ja kansainvälisten kehitystavoitteiden toteutumisen edistämiseksi?

Tiivistetty vastaus: Muutosharavointi-menetelmän avulla tunnistettiin 18 vaikuttamistyön laaja-alaista tulosta (outcome). Niiden suhteellinen merkitys Suomen vaikuttamistavoitteiden näkökulmasta analysoitiin. Neljäsosa laaja-alaisista tuloksista sisälsi EU:n kolmen keskeisen toimielimen tukemia kehityspoliittisia muutoksia, joten näitä voidaan pitää merkittävinä saavutuksina. Muilla vaikuttamistuloksilla on vähäisempi suhteellinen merkitys, koska ne rajautuvat yksittäisiin kehitysyhteistyötoimiin tai ovat kehityspolitiikan muutoksia joko yksittäisessä kumppanimaassa tai -maaryhmässä.

Sukupuolten välinen tasa-arvo erottuu alueena jolla Suomi on saavuttanut useita vaikuttamistuloksia, vaikka sen seksuaali- ja lisääntymisterveyttä ja -oikeuksia koskeneet tavoitteet eivät olekaan kokonaan täyttyneet. Myös muihin temaattisiin painopistealueisiin (esim. vammaisten henkilöiden oikeudet ja koulutus) liittyviä muutoksia tunnistettiin. Huolimatta siitä että Suomi nähdään Afrikan tukemiseen keskittyneenä toimijana ja Afrikka on Suomen kehityspolitiikan keskiössä, erityisiä Afrikkaan liittyviä laajoja tuloksia ei muutosharavoinnissa löydetty. Sekä EU-puheenjohtajuuskauden aikana että uuden ulkosuhderahoitusvälineen (NDICI) neuvotteluprosessissa Suomi saavutti menestyksekkäästi useita asettamia tavoitteita.

Evaluoinnin 31 keskeistä löydöstä ja näistä muodostetut 11 johtopäätöstä sekä 13 suositusta on esitetty ”keskeiset löydökset, johtopäätökset ja suositukset”-taulukossa seuraavalla sivulla.



KESKEISET LÖYDÖKSET, JOHTOPÄÄTÖKSET JA SUOSITUKSET

LÖYDÖKSET	JOHTOPÄÄTÖKSET	SUOSITUKSET
<p>Löydös 3.1: Useat 18 tunnistetusta laaja-alaisesta tuloksesta liittyvät Suomen onnistuneeseen vaikuttamiseen EU:n kehityspolitiikkaan EU:n neuvoston tasolla tai operatiivisiin päätöksiin kumppanimaissa. Useita tuloksia saavutettiin Suomen vuoden 2019 EU-puheenjohtajuuden aikana.</p> <p>Löydös 3.2: Viisi laaja-alaista tulosta heijastaa EU:n keskeisiä päätöksiä, joihin liittyy komission, neuvoston ja parlamentin hyväksymä kehityspolitiikan muutos, ja joihin Suomi ja muut samanmieliset jäsenmaat aktiivisesti vaikuttivat. Muilla 13 vaikuttamistuloksella on vähäisempi suhteellinen merkitys, koska ne rajautuvat yksittäisiin kehitysyhteistyötoimiin tai ovat kehityspolitiikan muutoksia joko yksittäisessä kumppanimaassa tai -maaryhmässä.</p> <p>Löydös 3.3: Ulkoministeriö saavutti arviointijakson aikana suurimman osan sukupuolten tasa-arvoon ja koulutukseen liittyvistä EU:n politiikkaan vaikuttamisen tavoitteistaan. Ministeriö ei kuitenkaan saavuttanut kaikkia tavoitettaan seksuaali- ja lisääntymisterveyden ja -oikeuksien edistämisessä.</p> <p>Löydös 3.4: Vaikka Suomi yleisesti onnistui hyvin EU-puheenjohtajuudessaan ja EU:n ja Afrikan välinen kumppanuus oli nostettu Suomen presidenttiohjelman tärkeimmäksi prioriteetiksi, Afrikkaan liittyviä laaja-alaisia tuloksia ei saavutettu.</p> <p>Löydös 3.5: Suomen tavoitteet liittyen yhden välineen periaatteeseen ja sen maantieteellisiin ja temaattisiin painopisteisiin EU:n ulkosuhderahoitusväline-neuvotteluissa (NDICI) saavutettiin suurelta osin. Tavoite ilmastonmuutosta koskevan kirjauksen osalta ei kuitenkaan täyttynyt.</p> <p>Löydös 2.6.1: Suurten pitkän aikavälin kehityspoliittisten vaikutusten kannalta tärkein Suomen linjan mukainen EU:n rahoituspäätös arviointijaksolla oli EU:n kehitysrahoituksen säilyttäminen aiempaa vastaavalla tasolla uudessa monivuotisessa rahoituskehyksessä (2021–2027).</p> <p>Löydös 4.1: Vaikka EU:n päätöksentekoprosessit rajaavat vaikuttamismahdollisuudet pieniksi, Suomi on onnistunut vaikuttamaan EU:n kehityspolitiikkaan. Suomi on muotoillut kehityspolitiikkansa linjaan EU:n kehityspolitiikan kanssa ja tämä on auttanut vaikuttamisessa. Suomi on myös käyttänyt vaikuttamiskeinovalikoimaa taitavasti ja tarttunut tarjoutuneisiin mahdollisuuksiin.</p> <p>Löydös 4.2: Suomen onnistuneen vaikuttamistyön Brysselissä ja jäsenmaiden osalta taustalla on erityisesti kaksi merkittävää tekijää. Nämä ovat Suomen maine uskottavana kehityspolitiikan toimijana ja tunnustettu asiantuntemus Suomen prioriteetteihin liittyvillä kehityspolitiikan aloilla.</p>	<p>J1: Ulkoministeriön pyrkimykset vaikuttaa EU:n kehityspolitiikkaan ovat tuottaneet tuloksia. Suomi on saavuttanut useita vaikuttamistavoitteitaan, mikä on hyvä saavutus pienelle jäsenmaalle.</p>	
<p>Löydös 2.4: Evaluoinnin haastateltavat kokivat yleisesti, että Suomen poliittiset kannanotot olivat selkeitä ja näkyviä, ja että EU:n toimielimet ja jäsenvaltiot ymmärsivät kannanotot hyvin. EU-instituutioiden haastateltavat korostivat Suomen ja EU:n kantojen yhtenäisyyttä sekä Suomen luotettavuutta EU:n kumppanina näiden näkemysten edistämisessä EU:n sisäisissä keskusteluissa.</p> <p>Löydös 2.5: Suomella on arvostettu ja vaikutusvaltainen rooli erityisesti sukupuolten väliseen tasa-arvoon (seksuaali- ja lisääntymisterveys ja -oikeudet, transformatiivinen lähestymistapa), ihmisoikeusperustaiseen lähestymistapaan, luonnonvarojen kestävään käyttöön, syrjimättömyyteen ja Afrikan tukemiseen liittyvissä kysymyksissä. Lisäksi Suomen johtajuutta koulutussektorilla arvostetaan, kun taas metsäsektorilla Suomella nähdään olevan asiantuntemusta, jota se on kuitenkin jossain määrin haluton käyttämään. Suomen asiantuntemus vammaisten henkilöiden oikeuksissa tunnustetaan, joskin sen roolin nähdään olevan suppeampi kuin edellä luetelluissa teemoissa. Ilmastoiresilienssiin ja -diplomatiaan liittyvissä kysymyksissä Suomi on noussut näkyvämmäksi vasta vuodesta 2019 alkaen.</p>	<p>J2: Kaikkiaan Suomi on onnistunut johdonmukaisella, tehokkaalla ja tarkoituksenmukaisella tavalla edistämään kehityspoliittisia prioriteettejaan EU:ssa, vaikka joidenkin prioriteettien kohdalla menestys on ollut parempaa kuin toisten.</p>	<p>S1: Ulkoministeriön tulisi rakentaa EU:n kehityspolitiikkaan ja -yhteistyöhön vaikuttaminen onnistumisiensa pohjalle. Ulkoministeriö on onnistunut hyvin esimerkiksi sukupuolten väliseen tasa-arvoon vaikuttamisessa, kun taas esimerkiksi ilmastoiresilienssiin ja vammaisten henkilöiden oikeuksien kohdalla vaikuttamistyö ei ole ollut yhtä tuloksekasta.</p>



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<p>Löydös 2.7.1: Kaiken kaikkiaan Suomi nähdään EU:ssa ja sen ulkopuolella luotettavana, erittäin ammattitaitoisena ja tuloksia tuottavana kehitysyhteistyön toimijana, jonka kanssa EU-toimijat ja sidosryhmät mielellään työskentelevät.</p> <p>Löydös 2.7.2: Evaluointi löysi vahvaa näyttöä siitä, että EU-toimijat arvostavat Suomen tekemää kehitysyhteistyötä. EU:ssa arvostetaan Suomen systemaattista, jatkuvasti kehittyvää ja pitkäaikaista lähestymistapaa, mutta jotkin tahot pitävät Suomen toimintaa suhteellisen varovaisena.</p> <p>Löydös 4.5: Suomen keskittyminen läpileikkaaviin tavoitteisiin on mahdollistanut pitkäkestoisen, näkyvän ja läpinäkyvän lähestymisen vaikuttamiseen.</p>		
<p>Löydös 1.2.2: Suomen rajalliset kehitysyhteistyömäärärahat eivät näytä rajoittavan vaikuttamista, mutta Suomella olisi parannettavaa EU-rahoituksen hankkimisessa toteuttamansa kehitysyhteistyön tueksi. Ulkoministeriö on käynyt läpi EU:n pilariarvioinnin, joten se pystyy hallinnoimaan delegoituja yhteistyövaroja. Ulkoministeriö on kuitenkin ainoa pilariarvioitu suomalainen toimija, mikä on rajoittanut delegoitujen yhteistyövarojen laajempaa käyttöä.</p> <p>Löydös 2.6.2: EU:n rahoituspäätöksistä kumppanimaatasolla nousi esille joitakin sellaisia tapauksia, jotka ovat olleet selkeästi Suomen kehityspolitiikan mukaisia. Näistä esimerkki on EU:n delegoitu yhteistyörahoitus Suomen Kaukolännen vesivarantohankkeelle Nepalissa. Nämä ovat olleet myönteisiä, joskin kummankin osapuolen joustavuutta vaatineita ensikokemuksia, mutta tämän käytännön laajentaminen edellyttää todennäköisesti suomalaisten kehitysyhteistyön suunnitteluprosessien järjestelmällistä muuttamista.</p>	<p>J3: Suomella on ollut hyvä alku EU-varojen hyödyntämisessä omien kehitysyhteistyömäärärahojen tueksi. Perusta, joka mahdollistaisi EU:n delegoiman kehitysyhteistyön laajentamisen, vaikuttaa kuitenkin heikolta.</p>	<p>S2: Suomen tulisi kasvattaa EU:n delegoiman kehitysyhteistyörahoituksen strategista käyttöä.</p>
<p>Löydös 2.1.1: Suomi hyödyntää laajasti liittoumien muodostamista sekä samanmielisten jäsenmaiden kanssa että tapauskohtaisesti. Tätä toimintatapaa käytetään myös suurlähetystöissä. Muut jäsenmaat ja EU-instituutiot pitävät Suomea taitavana liittoumien muodostuksessa.</p> <p>Löydös 2.1.2: Temaattisesti Suomi on työskennellyt samanmielisten jäsenmaiden liittoumien kanssa, vaikkakaan ei aina samalla tasolla kaikissa tärkeissä teemoissaan. Suomi on esimerkiksi panostanut voimakkaasti sukupuolten väliseen tasa-arvoon, mutta ei vammaisten oikeuksiin liittyviin liittoumiin. Tämä saattaa osittain selittää, miksi Suomea pidetään EU:n kehitysyhteistyötoimijoiden keskuudessa huomattavasti näkyvämpänä toimijana sukupuolten tasa-arvoon liittyvissä kysymyksissä kuin vammaisten oikeuksiin liittyvissä kysymyksissä.</p> <p>Löydös 2.2.1: Ulkoministeriö on yleisesti ottaen pystynyt yhdistelemään erilaisia vaikuttamisväyliä merkityksellisellä, yhtenäisellä ja tehokkaalla tavalla. Suomen edustajat osallistuvat säännöllisesti EU:n hallintoelinten toimintaan Brysselissä ja maatasolla päätöksenteossa, koordinoinnissa, ohjelmaohjauksessa ja muissa aloitteissa.</p> <p>Löydös 2.2.2: EU:n toimielimissä on Suomen kansalaisia hyödyllisissä asemissa, joko EU:n virkamiehinä tai ulkoministeriön komennuksella. Ulkoministeriö onkin ennakoivasti nimittänyt suomalaisia asiantuntijoita tiettyihin tehtäviin. Kaikkiaan EU:n toimielimissä työskentelee kuitenkin vielä varsin vähän Suomen kansalaisia.</p> <p>Löydös 4.3: Liittoumien muodostaminen samanmielisten jäsenmaiden kanssa on ollut Suomelle jo pitkään merkittävä vaikuttamisen työkalu suhteessa sekä komissioon että neuvostoon.</p>	<p>J4: Rajallisista resursseista huolimatta Suomi on käyttänyt monenlaisia keinoja ja kanavia vaikuttamisessa. Suomi on erityisesti painottanut työskentelyä samanmielisten valtioiden liittoutumien kanssa. Suomalaisten vähäinen määrä EU:n virkakoneistossa kuitenkin rajoittaa vaikutusmahdollisuuksia.</p>	<p>S3: Suomen tulisi käyttää liittoumien rakentamista ja samanmielisten valtioiden kanssa työskentelyä pääasiallisena EU-vaikuttamisen keinona. Ulkoministeriön tulisi varmistaa, että sen henkilöstö on asianmukaisesti koulutettu tämän mekanismisin hyödyntämisessä.</p> <p>S4: EU:n kehitysyhteistyöstä huolehtiviin toimielimiin tulisi saada lisää suomalaisia.</p>



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<p>Löydös 4.4: Muita Suomen vaikuttamisenestukseen liittyviä tekijöitä ovat (i) keskittyminen läpileikkaaviin tavoitteisiin; (ii) johdonmukainen, näkyvä ja läpinäkyvä lähestyminen; (iii) vahva sidos yhteistyöhön komission kanssa; (iv) sektori-osaajien ja strategisesti sijoittuneiden lähetettyjen asiantuntijoiden hyödyntäminen; ja (v) best practice- sekä vahvaan näyttöön nojautuminen.</p>		
<p>Löydös 1.1: Ulkoministeriön EU-vaikuttamisstrategiat ovat yleensä johdonmukaisia ja yhdistetty hyvin Suomen kehityspolitiikkaan ja EU:n agendaan. Niiden heikkouksiin kuuluu jossain määrin epäselvä priorisointi, riittämätön sisäinen kuuleminen sekä rajallinen suunnitelmallisuus. Myös ministeriön eri osien välinen tiedonjako on ajoittain heikkoa.</p>	<p>J5: Eri puolilla ulkoministeriötä mielletään EU-vaikuttamisen prioriteetit eri tavoin. Osa henkilöstöstä kokee EU-vaikuttamisen tavoitteiden keskinäisen priorisoinnin haastavaksi. Toisaalta haastavaksi koetaan myös priorisointi EU-vaikuttamisen ja muiden työtehtävien välillä.</p>	<p>S5: EU-vaikuttamisen tavoitteiden priorisointia tulisi parantaa. Yksi väylä tähän on täsmentää vaikuttamisen suhteellinen tärkeys osana ulkoministeriön strategiaa ja toimintaa ja sitouttaa kaikki ministeriön vaikuttamista tekevät tahot täsmennyksellä muodostettuun yhteiseen linjaan.</p> <p>S6: Erityisesti on syytä tunnistaa yhtäältä tarpeet EU-vaikuttamiselle Brysselissä ja toisaalta kumppanimaissa. Varsinkin jälkimmäisissä vaikuttamisagendan priorisointiin tulee kiinnittää lisähuomiota.</p>
<p>Löydös 1.1: Ulkoministeriön EU-vaikuttamisstrategiat ovat yleensä johdonmukaisia ja yhdistetty hyvin Suomen kehityspolitiikkaan ja EU:n agendaan. Niiden heikkouksiin kuuluu jossain määrin epäselvä priorisointi, riittämätön sisäinen kuuleminen sekä rajallinen suunnitelmallisuus. Myös ministeriön eri osien välinen tiedonjako on ajoittain heikkoa.</p> <p>Löydös 1.5.2: Institutionaaliseen oppimiseen ja näyttöön perustuva ennakointi ja visiointi on puutteellista.</p> <p>Löydös 2.3: Suomella on vankka kokemus EU-keskustelujen hyödyntämisestä poliittisten prioriteettien edistämässä kuhunkin aiheeseen ja kontekstiin sopivalla tavalla. Erityisesti vuoden 2019 EU-puheenjohtajuuden mukanaan tuomat mahdollisuudet hyödynnettiin ja haastateltavat arvostivat Suomen huolellista presidenttikautensa valmistelua ja toteutusta.</p> <p>Löydös 4.7. Suomen menestyksensä puheenjohtajakauden kulmakiviä olivat perusteellinen valmistautuminen, hyvä henkilöstö, sekä rakentava ja kaikki mukaan ottava tapa johtaa kokouksia ja neuvotteluja.</p>	<p>J6: Suomi on hyödyntänyt hyvin EU-prosessien tarjoamia mahdollisuuksia, kuten EU-puheenjohtajuuttaan vuonna 2019, merkittävien tulosten saavuttamiseksi. Puutteellinen priorisointi ja suunnittelu voidaan kuitenkin nähdä tulevan vaikuttamistyön tuloksellisuuden riskitekijöinä.</p>	<p>S7: EU-vaikuttamiselle olisi hyvä laatia tulevaisuuteen katsovia keskipitkän ajan strategioita, jotka kytkeytyvät EU:n kehitysyhteistyöagendaan ja sen ajallisiin sykleihin. Näissä strategioissa tulisi tunnistaa potentiaaliset EU:n agendalle tulevat uudet mahdollisuudet, joihin Suomi voisi tarttua.</p> <p>S8: Ulkoministeriössä tulisi pohtia pikaisesti, miten Ursula von der Leyenin komission toimikauden päättymistä ja uuden aloittamista voidaan parhaiten käyttää mahdollisuutena vahvistaa suomalaista vaikuttamista EU:n kehitysyhteistyöhön. Samalla tulisi rakentaa perustaa työskentelylle DG INTPA:n uuden komissaarin kanssa.</p>



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<p>Löydös 1.3: Ulkopuoliset toimijat suhtautuvat yleisesti ottaen positiivisesti ulkoministeriön sisäiseen järjestäytymiseen ja henkilöstön itsenäiseen toimimiseen sekä Brysselissä että edustustoissa. Sisäisesti positiivisena nähtiin litteä organisaatorakenne, vähäinen hierarkia, itsenäisyys ja tuki. Näkemykset roolien ja vastuiden asettamisesta, johtamisesta, sekä EU-asioiden osaamisesta ja koordinaatiosta olivat osin positiivisia ja osin negatiivisia.</p>	<p>J7: Ulkoministeriön sisäinen järjestäytyminen on merkittävä tekijä onnistuneessa EU-vaikuttamisessa ja auttanut saavuttamaan monia tuloksia. Johtajuudessa on kuitenkin paikoin parannettavaa.</p>	<p>S9: Ulkoministeriön tulisi selvittää kunkin toimijansa rooli EU-vaikuttamisessa ja viestiä siitä läpi organisaation. Ulkoministeriön ylimmän johdon keskuudessa tulisi vahvistaa vaikuttamisen johtajuus.</p>
<p>Löydös 1.5.1: EU-vaikuttamisen monitorointiin ja oppien keräämiseen ei ole systemaattista lähestymistapaa, ja se perustuu pitkälti yksittäisten henkilöstön edustajien varaan. Joidenkin yksiköiden ja tiimien tasolla on kuitenkin hyviä käytäntöjä tiedon välittämisestä kollegoille, joskin nämä ovat etupäässä kertaluontoisia ja tarveperustaisia.</p> <p>Löydös 1.5.2: Institutionaaliseen oppimiseen ja näyttöön perustuva ennakointi ja visiointi on puutteellista.</p>	<p>J8: Ulkoministeriön tulostiedon ja -tietämyksen hallintaprosessit EU:n kehityspoliittikaan vaikuttamiseen liittyen ovat melko epävirallisia. Vaikuttamisen monitorointi ja oppien kerääminen ei ole systematisoitua ja saatu tieto linkittyy huonosti tulevan vaikuttamisen suunnitteluun.</p>	<p>S10: Ulkoministeriön tulisi luoda EU-vaikuttamisen palaute- ja oppimismekanismi, ja käyttää siitä saatavaa tietoa EU-vaikuttamisen strategian laatimisessa.</p>
<p>Löydös 1.2.1: Ulkoministeriön henkilöstömitoitus on tiukkaa. Rajalliset henkilöstöresurssit rajoittavat EU-vaikuttamistyötä sekä Brysselissä että suurlähetystöissä, mikä johtaa menetettyihin mahdollisuuksiin ja pakottaa henkilöstön mahdollisimman huolelliseen priorisointiin. Myös EU:n virkamiehinä ja erityisesti kansainvälisten kumppanuuksien pääosastossa on hyvin vähän suomalaisia.</p> <p>Löydös 4.6: Toisaalta priorisoinnin puute ja rajallinen läsnäolo nousivat pääasiallisiksi tuloksellista vaikuttamista rajoittaviksi sisäisiksi tekijöiksi sidosryhmien mielestä.</p>	<p>J9: Ulkoministeriön henkilöstörajoitukset rajoittavat EU-vaikuttamista ja johtavat menetettyihin mahdollisuuksiin.</p>	<p>S11: Ulkoministeriön tulisi ottaa strategisempi ja ennakoivampi lähestyminen EU:n kehitysyhteistyöhön vaikuttamisen henkilöstövalintoihin. Lähestymistavassa tulisi huomioida tarve priorisoida vaikuttamistavoitteita sekä käytössä olevat henkilö- ja rahalliset resurssit.</p>
<p>Löydös 1.4.1: Suomen EU-asioiden koordinaatio toimii pääosin hyvin sekä ulkoministeriössä että hallinnossa, ylipäättään, mutta EU:n kehitysyhteistyöhön vaikuttamisen sisäisessä tehokkuudessa on myös parantamisen varaa. Huomattava esimerkki on epäselvä sisäinen koordinaatio EU:n merkittäviin ja tulevaisuuteen kantaviin Team Europe-aloitteisiin (TEI) ja Global Gatewayhin liittyen.</p> <p>Löydös 1.4.2: Koordinaatio Kehityspoliittisen toimikunnan (KPT) ja eduskunnan kanssa on vajavaista. Tämä heikentää vaikuttamistyön läpinäkyvyyttä ja vastuuvollisuutta eikä mahdollista KPT:n ja eduskunnan täyttä tukea ulkoministeriön EU:n kehityspoliittikaan ja –yhteistyöhön vaikuttamiselle.</p>	<p>J10: Suomen sisäinen koordinaatio on paikoin puutteellista. Tähän liittyy riskejä erityisesti avautuvien mahdollisuuksien hyödyntämisen osalta (esim. TEI ja Global Gateway).</p> <p>J11: Suomen EU-vaikuttamisen ulkoinen koordinaatio on rajallista. Tämä heikentää mahdollisuuksia saada tukea kehityspoliittiseen vaikuttamiseen EU:n ulkosuhteissa.</p>	<p>S12: Ulkoministeriön tulisi kriittisesti tarkastella valmiuttaan täysimittaisesti osallistua Team Europe-aloitteisiin (TEI) ja Global Gatewayhin, sekä tarvittaessa laatia selkeä strategia valmiuden parantamiseksi.</p> <p>S13: Ulkoministeriön tulisi parantaa EU-vaikuttamisen läpinäkyvyyttä, vastuuvollisuutta ja ulkoista viestintää. Näin toimimalla vaikuttamiselle olisi mahdollista saada laajempi sidosryhmätoimijoiden tuki.</p>



Sammanfattning

Utvärderingens syfte, målsättning och metod

Utrikesministeriets (UM) enhet för utvecklingsutvärdering beställde denna strategiska utvärdering för att granska Finlands utvecklingspolitiska inflytande i Europeiska Unionen (EU).

Syftet med utvärderingen var att bedöma relevansen, måluppfyllelsen och samstämmigheten i UM:s olika utvecklingspolitiska verksamheter i fråga om hur de påverkar EU och dess institutioner, och att ge vägledning till ministeriet om hur denna påverkan kan ytterligare stärkas. Utvärderingen är framåtblickande och syftar till att hjälpa UM dra lärdom av tidigare erfarenheter, och tillämpa dessa lärdomar inom sin resultatorienterade strategi för multilateral påverkan.

Utvärderingen hade tre huvudsakliga **målsättningar**. Det första målet var att bedöma hur Finland har lyckats främja Agenda 2030, *Building Back Better (and Greener)*, och Finlands utvecklingspolitiska mål i EU, samt medlemsstaternas (MS) gemensamma praxis och principer för utvecklingssamarbete. Det andra målet var att bedöma resultatuppfyllelsen i olika påverkansaktiviteter, inklusive påverkan på resultat, medel och kanaler och vilka de bästa möjligheterna är för Finland att påverka EU, med hänsyn till tillgängliga personalresurser och budget. Det tredje syftet var att analysera de faktorer som har underlättat/möjliggjort eller hindrat resultatuppfyllelsen vad gäller påverkanarbetet gentemot EU.

Dessutom förväntades utvärderingen **se framåt och bidra med insikter** om de bästa möjligheterna och sätten för Finland att påverka EU framöver, särskilt under den nya EU-budgeten och utvecklingssamarbetet. Likaså förväntades utvärderingen att reflektera kring hur ministeriet och andra relevanta intressenter skulle kunna utveckla sin praxis för att maximera inflytande på EU i framtiden, med hänsyn till tillgängliga personalresurser och budget.

Metoden för utvärderingen utgår från en **förändringsteori** som på ett sammanhängande och logiskt sätt presenterar den orsakssamverkan som råder – eller förväntas råda – mellan UM:s åtgärder (insatser) och de särskilda förändringar (resultat) som kan skönjas inom den strategiska utformningen och genomförandet av EU:s utvecklingspolitik. Med andra ord visar förändringsteorin de olika stegen och hur dessa bygger på varandra för att uppnå påverkansmålen. Tre utvärderingsfrågor (EQ) har ringats in som var och en berör specifika delar av förändringsteorin, på kort och lång sikt. Utvärderingens metod inspirerades även av tidigare utvärderingar och relevant forskning, till exempel om småstatsteori.

Utvärderingen följde två spår. Det första spåret fokuserade på de två första utvärderingsfrågorna: EQ1 om UM:s organisationen för påverkan och EQ2 om påverkansprocessen. Det andra spåret fokuserade på EQ3 om resultat, och tog hjälp av en metod för "outcome harvesting" som först identifierade förändringar/resultat och sedan hur dessa uppnåddes. Detta inkluderade en analys av faktorer som främjar och hindrar påverkanarbetet gentemot EU.



Data samlades in från offentliga dokument och litteratur och från flera olika källor inklusive:

- 110 semistrukturerade **intervjuer**, som genomfördes i Helsingfors, Bryssel och på andra håll med tjänstemän från UM, EU:s institutioner, och ett urval av EU:s medlemsstater.
- Två **geografiska fallstudier** av Nepal respektive Tanzania, samt en tredje "mini-studie"² av Ukraina.
- Tre **process-relaterade fallstudier** om särskilda händelser under utvärderingsperioden som utgjorde viktiga möjligheter för inflytande: det finska EU-ordförandeskapet 2019, förhandlingen av det nya EU NDICI-finansieringsinstrumentet och svaret på Covid-19/Team Europe Initiatives (TEIs).
- En **peer review** gjordes också för att jämföra erfarenheterna från Finlands påverkansarbete gentemot EU med ett urval av sex andra, små och medelstora EU-medlemsstater (Belgien, Danmark, Irland, Polen, Portugal och Sverige).
- En **webbenkät** skickades till 13 finska ambassader och 17 EU-delegationstjänstemän i 14 partnerländer för att samla in synpunkter på Finlands EU-inflytande.
- Slutligen tog utvärderingsteamet fram fem **specifika ämnesbeskrivningar** som sammanfattade vilka framsteg som gjorts när det gäller EU-inflytande inom politiskt prioriterade områden (jämförelse, samhällsstyrning och mänskliga rättigheter, funktionshindrades rättigheter, utbildning och klimatförändringar).

Under hela processen lades särskild vikt vid att kontextualisera resultat, både vad gäller det institutionella ramverket och tidsaspekter, för att beakta förändringar i politiska prioriteringar.

Sammanfattande svar på utvärderingsfrågorna

Fråga 1 – I vilken utsträckning är UM:s styrning, organisation, processer och verktyg strukturerade på ett sätt som maximerar Finlands inflytande vad gäller utvecklingspolitik och utvecklingssamarbete?

Sammanfattande svar: UM:s strategier för EU-påverkan är förenliga med dess utvecklingspolitik och allmänt väl kända, men de är komplexa, inte alltid tillräckligt fokuserade på gällande prioriteringar, och inte alltid tillräckligt visionära. Vad gäller resurser finns det inget system för att följa upp hur mycket tid personalen lägger ner på påverkansarbetet och delar av personalen är uppenbart överansträngd, även om det också finns några bra exempel på flexibilitet i personalplacering. Det förekommer att Finland använder EU-medel som hävstång, men inte i någon högre utsträckning. Externa aktörer ser positivt på UM:s kompetens och professionalitet, både på personnivå och organisatorisk nivå. Interna synpunkter på roller och ansvar skiljer sig åt mer. Det finns några bra exempel på intern (informell och tillfällig) rapportering, men institutionaliserade system för uppföljning, utvärdering och lärande lyser med sin frånvaro.

2 Denna mini-studie var ursprungligen avsett som en tredje fullständig fallstudie men bantades ner på grund av kriget i Ukraina.



Fråga 2 – I vilken utsträckning har UM lyckats främja och införliva sina utvecklingspolitiska mål och principer i sitt engagemang för och samarbete med EU på ett relevant, sammanhängande och effektivt sätt?

Sammanfattande svar: Finlands hantering av påverkansarbetet gentemot EU:s utvecklingssamarbete är relevant, sammanhängande, någorlunda effektiv och löper smidigt.

Det praktiska genomförandet av Finlands politik för att påverka EU fungerar i allmänhet väl. Finland utnyttjar existerande möjligheter och mekanismer för påverkansarbete. I synnerhet bedriver Finland ett omfattande och effektivt arbete med olika grupperingar av likasinnade medlemsstater och koalitioner, och bidrar till att både utveckla och bibehålla dessa efter behov. Finland ansågs i allmänhet vara mycket kompetent på att bygga upp och utnyttja koalitioner. Finland samarbetar också bra med EU-kommissionen och ses som en konstruktiv medlemsstat som följer reglerna, har sina gränser som inte får överskridas, men som också, vid behov, har en pragmatisk inställning, söker samförstånd och kompromisser.

Medlemsstaternas och EU-institutionernas representanter var genomgående positiva i sin bedömning av hur finländska tjänstemän arbetade, såg dem som välorganiserade och förberedda, professionella, ärliga och lättillgängliga. Deras långsiktiga, iterativa förhållningssätt och gedigna erfarenhet ses som en styrka. Finland har byggt upp en positiv image inom utvecklingssamarbetet.

Finlands ordförandeskap i EU var en viktig omständighet under utvärderingsperioden, och erbjöd UM:s tjänstemän att visa upp sina organisatoriska färdigheter. Sättet EU-ordförandeskapet genomfördes på möttes genomgående av positiva kommentarer. Finland deltar regelbundet och proaktivt i andra styrningsstrukturer inom EU, både arbetsgrupper i Bryssel och andra samordningsgrupper i Europa eller i partnerländer.

Finlands ståndpunkter i policy-frågor är allmänt välkända och man anses ha en ledande och inflytelserik roll särskilt inom jämställdhet (sexuell och reproduktiv hälsa och rättigheter, ett transformativt förhållningssätt), rättighetsperspektivet, inkludering och stöd till Afrika, på all prioriterade områden. Skogsbruk och utbildning är andra områden där Finlands expertis noteras och uppskattas. Likaså har Finland ett erkänt kunnande och inställning till inkludering av personer med funktionshinder, även om detta området är mindre framträdande, vilket delvis kan förklaras av att Finland inte arbetar genom koalitioner på detta område, i kontrast till jämställdhetsområdet. Likaså är klimatåtgärder ett mindre framträdande inslag i Finlands framtoning, vilket i sin tur kan bero på att UM:s aktiviteter inom klimatdiplomatin tog fart först mot slutet av utvärderingsperioden och sedan mer i UNFCCC (även om Finland och EU samarbetar i det sammanhanget).

I vissa enstaka fall har EU:s beslut om stöd på landnivå tydligt legal i linje med finländska intressen, som t ex i fallet med EU:s delegerade samfinansiering av det finska vattenprojektet i Nepal (RVWRMP), och i Tanzania där EU:s anpassning av sitt fleråriga program öppnar upp möjligheter för finansiering av Finlands prioriteringar. När det gäller stora och långsiktiga effekter på policy-nivå var det viktigaste EU-beslutet som sammanföll med finska intressen det om att bibehålla nivån på biståndsbudgeten i EU:s nya fleråriga stödprogram för perioden 2021-2027.



Fråga 3 I vilken utsträckning har UM lyckats uppnå påverkansmål/inflytande inom EU som främjar finska intressen och den internationella utvecklingsagendan?

Sammanfattande svar: På de områden som granskats av utvärderingen identifierades 18 resultat, som bedömdes på ett systematiskt sätt i fråga om signifikans. En fjärdedel av dessa resultat bestod av förändringar på policy-nivå, som formellt godkändes av de tre centrala EU-institutionerna och är därför av stor betydelse. Resten av resultaten är av mer begränsad betydelse och ofta av mer operativ karaktär eller består av politiska förändringar på regional nivå eller landnivå.

Jämställdhet är ett område där Finland har uppnått många resultat även om ambitionerna vad gäller SRHR inte helt uppfylldes. Det finns också enstaka resultat inom andra prioriterade ämnesområden (t.ex. funktionshindrades rättigheter, utbildning), men inget utmärkande resultat i Afrika. Under EU-ordförandeskapet och förhandlingarna om NDICI-GE uppnådde Finland flera förväntade resultat.

Tabellen nedan presenterar utvärderingens 31 resultat, 11 slutsatser och 13 rekommendationer avseende hur UM kan öka inflytandet på EU:s utvecklingspolitik.



UTVÄRDERINGENS RESULTAT, SLUTSATSER OCH REKOMMENDATIONER

RESULTAT	SLUTSATSER	REKOMMENDATIONER
<p>Resultat 3.1: De 18 långsiktiga resultat som identifierades omfattar flera där Finland på olika sätt har lyckats påverka EU:s utvecklingspolitik i rådsdiskussioner, men också mer operativa beslut i partnerländerna. Olika resultat uppnåddes även under de särskilda omständigheterna som rådde under Finlands EU-ordförandeskap 2019.</p> <p>Resultat 3.2: I fem fall uppnåddes långsiktiga resultat genom viktiga EU-beslut om policy-förändringar som godkänkts av kommissionen, rådet och parlamentet, med aktivt inflytande från Finland och andra likasinnade medlemsstater. Ytterligare tretton resultat utgörs av förändringar av mer begränsad omfattning och betydelse, ofta på landnivå eller i planering av insatser.</p> <p>Resultat 3.3: Under utvärderingsperioden har UM uppnått de flesta av sina påverkansmål gentemot EU inom områdena jämställdhet och utbildning, men ambitionen att ytterligare främja SRHR uppfylldes inte.</p> <p>Resultat 3.4: Även om Finlands EU-ordförandeskap överlag var en framgång uppnåddes inget specifikt resultat i förhållande till Afrika, trots att partnerskapet mellan EU och Afrika var prioriterat i Finlands ordförandeskapsprogram.</p> <p>Resultat 3.5: Finlands ståndpunkter inom NDICI-förhandlingarna uppnåddes till stor del vad gäller principen om en enda mekanism och dess geografiska och tematiska fokus. Finlands ambition att stärka skrivningarna om klimatförändringar uppfylldes dock inte.</p> <p>Resultat 2.6.1: När det gäller stora långsiktiga politiska effekter var EU:s beslut att, i linje med Finlands intressen, upprätthålla nivån på biståndet inom den fleråriga budgetramen (2021-2027) det viktigaste (allt offentligt utvecklingsbistånd återfinns nu i NDICI-GE).</p> <p>Resultat 4.1: Finland har kunnat påverka EU trots ett begränsat utrymme för sådan påverkan inom EU:s beslutsprocesser. För att åstadkomma detta drog Finland nytta av utrikespolitikens anpassning till EU:s utvecklingspolitik. Finland använde även god praxis och utnyttjade de möjligheter som uppstod.</p> <p>Resultat 4.2: Finlands anseende som en trovärdig utvecklingsaktör och den ledande expertis som man besitter inom utvalda områden är fortfarande i särklass de två viktigaste faktorerna bakom Finlands inflytande i Bryssel och i partnerländerna.</p>	<p>S1: UM:s ansträngningar att påverka EU:s politik för utvecklingssamarbete har gett värdefulla resultat. En rad betydande resultat har uppnåtts, vilket ska ses som en stor framgång för en liten medlemsstat som Finland.</p>	
<p>Resultat 2.4: De som intervjuades ansåg i allmänhet att Finlands politiska ståndpunkter var tydliga och synliga, och EU-institutionerna och medlemsstaterna var väl införstådda med dessa. Intervjupersoner från EU-institutionerna betonade ofta att Finlands ståndpunkter sammanfaller med EU:s, och att Finland för fram dessa åsikter i EU-debatter på ett konsekvent sätt.</p> <p>Resultat 2.5: Finland har en ledande och inflytelserik roll, särskilt när det gäller jämställdhet (SRHR, transformativt tillvägagångssätt), rättighetsperspektivet och hållbar användning av naturresurser. Utbildning är ett annat område där Finlands ledarskap uppskattas. Finland anses även ha mycket god men mindre framträdande expertis när det gäller inkludering av personer med funktionshinder. Finland har också behållit sitt rykte som ledande inom skogssektorn, även om man ibland uppfattas som ovillig att använda denna expertis. UM:s ökande satsning på klimatåtgärder och klimatdiplomati har gradvis lyft Finlands profil på detta område sedan 2019.</p>	<p>S2: Finland har på ett sammanhängande, effektivt och relevant sätt lyckats främja sina egna utvecklingspolitiska prioriteringar i EU-sammanhang, men i olika utsträckning.</p>	<p>R1: UM bör kapitalisera på det inflytande som har uppnåtts inom vissa områden (t.ex. jämställdhet) för att förbättra resultat på andra områden (t.ex. klimatåtgärder och funktionshinder), där Finlands påverkan har varit mindre.</p>



UTVÄRDERINGENS RESULTAT, SLUTSATSER OCH REKOMMENDATIONER

RESULTAT	SLUTSATSER	REKOMMENDATIONER
<p>Resultat 2.7.1: Överlag anses Finland vara en pålitlig, mycket professionell och slagkraftig aktör inom utvecklingssamarbetet, både inom och utanför EU, och andra aktörer samarbetar därför gärna med Finland.</p> <p>Resultat 2.7.2: Det finns starka belägg för att andra EU-aktörer har en positiv syn på Finlands insatser inom utvecklingssamarbetet. Finlands tillvägagångssätt uppskattas av EU, inte minst för att det är systematiskt, iterativt och långsiktigt, även om vissa tjänstemän anser att Finland går mycket försiktigt fram.</p> <p>Resultat 4.5: Finlands fokus på tvärgående mål har möjliggjort en mycket konsekvent, synlig och transparent påverkansstrategi.</p>		
<p>Resultat 1.2.2: Finlands begränsade budget för utvecklingssamarbete verkar inte vara ett hinder för påverkan, men man skulle kunna bli bättre på att mobilisera EU-finansiering. UM har genomgått en "pelar"-utvärdering av EU som gör det möjligt för myndigheten att förvalta delegerade medel för utvecklingssamarbete. UM är dock den enda finska aktören som har varit föremål för en sådan utvärdering, vilket är ett hinder för vidare expansion.</p> <p>Resultat 2.6.2: Det finns några exempel på EU-beslut om stöd på landnivå som ligger i linje med finländska intressen, såsom EU:s delegerade finansiering av det finska vattenprojektet i Nepal. De första erfarenheterna har varit positiva och krävt viss flexibilitet från båda sidor, men att expandera denna praxis kommer troligen att kräva en mer systematisk anpassning av Finlands system för programutveckling.</p>	<p>S3: Finland har börjat att använda EU-medel för att utöka landets biståndsbudget, men har inte lagt en tillräcklig grund för att öka användandet av delegerade EU-medel.</p>	<p>R2: Finland bör utöka den strategiska användningen av EU:s delegerade medel för utvecklingssamarbete.</p>
<p>Resultat 2.1.1: Finland bygger ofta koalitioner och samarbetar med likasinnade grupperingar av medlemsstater. Detta inbegriper såväl formella som informella grupperingar och samarbeten. Detta sker även på ambassadnivå. Tjänstemän från andra medlemsstater och EU-institutionerna tycker att Finland är bra på att bygga koalitioner.</p> <p>Resultat 2.1.2: Finland har samarbetat med likasinnade koalitioner av medlemsstater på sektornivå, men inte alltid på ett metodiskt sätt. Till exempel har Finland haft ett starkt engagemang i koalitioner som arbetar med jämställdhet men inte med de som arbetar med inkludering av personer med funktionshinder. Detta kan delvis förklara Finland mycket varierande synlighet inom EU:s utvecklingskretsar på dessa två områden.</p> <p>Resultat 2.2.1: I stort sett har UM kunnat kombinera olika påverkanskanaler på ett relevant, sammanhängande och effektivt sätt. Finska representanter deltar regelbundet i EU:s styrande organ för beslutsfattande, samordning, programutveckling och andra initiativ, både i Bryssel och på landnivå.</p> <p>Resultat 2.2.2: Finländska medborgare återfinns på olika befattningar inom EU-institutionerna, antingen som självständiga EU-tjänstemän eller som UM-utsända, och det finns exempel på att UM arbetar proaktivt med att utse finländska experter för specifika uppgifter. Totalt sett finns det dock fortfarande för få finländska medborgare som arbetar i EU-institutionerna.</p> <p>Resultat 4.3: Att bilda koalitioner med likasinnade stater fortsätter att vara ett viktigt verktyg för Finlands påverkansarbete inom EU. Detta sker både i arbetet med kommissionen och under rådsdiskussioner.</p>	<p>S4: Finland har framgångsrikt använt en mängd olika kanaler för påverkansarbetet trots begränsade resurser. Framför allt har man arbetat med koalitioner av likasinnade stater på många men inte alla områden. Å andra sidan är bristen på finländska medborgare i EU-institutionerna ett klart handikapp som håller tillbaka landets påverkansförmåga.</p>	<p>R3: Utöka koalitionsbyggande och samarbete med likasinnade stater som en kanal för påverkansarbete inom EU, och se till att UM:s tjänstemän är tillräckligt utbildade för att använda denna kanal på ett bra sätt.</p> <p>R4: Utöka finländska medborgares närvaro i EU-institutioner som hanterar utvecklingssamarbete.</p>



UTVÄRDERINGENS RESULTAT, SLUTSATSER OCH REKOMMENDATIONER

RESULTAT	SLUTSATSER	REKOMMENDATIONER
<p>Resultat 4.4: Ett antal faktorer bidrog till de resultat som Finland uppnådde genom sitt påverkansarbete, i synnerhet: (i) fokus på övergripande mål, (ii) mycket konsekvent, synligt och transparent tillvägagångssätt, (iii) starka band med kommissionen, (iv) användning av sektorsexpert och "strategiska" personalplaceringar, och (v) framtagande av dokument som belyser god praxis och/eller evidens.</p>		
<p>Resultat 1.1: Även om UM:s strategier för påverkan inom EU i allmänhet är sammanhängande och väl kopplade till Finlands utvecklingspolitik och EU-agenda, är prioriteringar inte alltid tydliga, och otillräckligt internt samråd har ägt rum. Därtill finns brister i planering och informationsutbytet mellan olika delar av ministeriet.</p>	<p>S5: Det finns en ganska stor variation i hur UM:s personal, i olika delar av myndigheten, uppfattar vilka prioriteringar som gäller för påverkansarbetet inom EU. Befintliga planer och vägledningar ger inte alltid tydliga besked om gällande strategier och mål, och i vilken mån påverkansarbetet ska prioriteras bland andra arbetsuppgifter.</p>	<p>R5: Förtydliga prioriteringen av olika mål inom påverkansarbetet gentemot EU bland annat genom att skapa internt samförstånd om hur dessa prioriteringar ska viktas inom UM:s strategi och operativa arbete.</p> <p>R6: I synnerhet bör man skilja på behoven att påverka EU in Bryssel och på landnivå (genom ambassader), och ta fram tydligare prioriteringar på landnivå för detta arbete.</p>
<p>Resultat 1.1: Även om UM:s strategier för påverkan inom EU i allmänhet är sammanhängande och väl kopplade till Finlands utvecklingspolitik och EU-agenda, är prioriteringar inte alltid tydliga, och otillräckligt internt samråd har ägt rum. Därtill finns brister i planering och informationsutbytet mellan olika delar av ministeriet.</p> <p>Resultat 1.5.2: Det finns en uppenbar brist på institutionellt framåttänkande och visioner baserat på lärdomar och nya fakta.</p> <p>Resultat 2.3: Finland har en gedigen meritlista när det gäller att använda de möjligheterna som ges av EU-debatter för att föra fram sina politiska prioriteringar på olika sätt, anpassat efter omständigheterna och det specifika ämnesområde som avhandlas. I synnerhet tog man vara på de möjligheter som gavs av EU-ordförandeskapet 2019 på ett väl genomtänkt sätt som mötte stor uppskattning bland intervjupersonerna.</p> <p>Resultat 4.7: Finlands framgångsrika EU-ordförandeskap kan förklaras av en rad interna faktorer. De viktigaste var noggranna förberedelser, bra personal, flexibilitet och ett smidigt, konstruktivt och inkluderande tillvägagångssätt för att hantera möten och förhandlingar.</p>	<p>S6: Finland har väl utnyttjat de möjligheter som uppstått genom regelbundna EU-processer, såsom EU-ordförandeskapet 2019, för att åstadkomma betydande resultat. Det finns dock vissa svagheter när det gäller prioritering och framtida planering som kan äventyra dessa framsteg.</p>	<p>R7: Ta fram mer framåtblickande påverkansstrategier med medellång planeringshorisont som är kopplade till EU:s agendor och planeringscykler för utvecklingssamarbete. På längre sikt försöka identifiera nya möjligheter för påverkan som ges av EU agendan på områden där Finland har en stark profil.</p> <p>R8: Överväg snarast hur slutet av von der Leyen-kommissionens mandatperiod och starten på en ny, bäst kan användas som en möjlighet att befästa det finländska inflytandet på EU:s utvecklingssamarbete, samt lägga grunden för samarbete med GD INTPA:s nya kommissionsledamot.</p>



UTVÄRDERINGENS RESULTAT, SLUTSATSER OCH REKOMMENDATIONER

RESULTAT	SLUTSATSER	REKOMMENDATIONER
<p>Resultat 1.3: Externa observatörer är i allmänhet positiva till hur UM är organiserat och den självständighet personal i Bryssel och på ambassader uppvisar. Internt ses den relativt platta organisationsstrukturen, den begränsade hierarkin, autonomi och stödet till representanter som positivt. Det finns dock olika åsikter om hur roller och ansvar beslutas om, vilken ledningskapacitet som finns, graden av EU-kunskap, och vad gäller tydligheten i samordningen mellan EU:s ämnesområden.</p>	<p>S7: Det sätt på vilket UM är organiserat internt är helt klart en viktig faktor för de resultat som uppnåtts inom påverkansarbetet, men det finns också utrymme för förbättringar och skäl för att stärka ledarskapet inom vissa områden.</p>	<p>R9: Klargör och kommunicera regelbundet om roller och ansvarsområden, samt säkerställ ett principfast ledarskap för påverkansarbetet gentemot EU på chefsnivå inom UM.</p>
<p>Resultat 1.5.1: Det finns inget system för att följa upp och dra lärdomar av Finlands EU-inflytande. Uppföljning och lärande är istället i hög grad beroende av den fortsatta närvaron av erfarna individer. Det finns dock en god praxis inom enskilda enheter och team som förmedlar viktig kunskap till kollegor, men detta görs till stor del på ad-hoc-basis.</p> <p>Resultat 1.5.2: Det finns en uppenbar brist på institutionellt framåttänkande och visioner baserat på lärdomar och nya fakta.</p>	<p>S8: De kunskapshanteringsprocesser som finns inom UM i fråga om påverkansarbetet gentemot EU:s utvecklingssamarbete är relativt informella. Det finns en brist på system för uppföljning och lärande, samt svaga kopplingar till planering inför framtiden.</p>	<p>R10: Inför en systematiserad återkopplings- och inlärningscykel som kan tjäna som underlag för strategier för påverkan gentemot EU.</p>
<p>Resultat 1.2.1: UM:s bemanning är knapp. Intervjuer pekar på att tidsbrist är en begränsning för påverkansarbetet gentemot EU, både i Bryssel och på ambassadnivå, vilket gör att de möjligheter som ges inte alltid kan tas om hand på ett bra sätt och fordrar att personalen prioriterar hårt mellan olika arbetsuppgifter. Det finns också för få finländska medborgare i EU:s förvaltning och särskilt inom GD INTPA.</p> <p>Resultat 4.6: Bristande prioritering och begränsad personalnärvaro anses av intressenter vara de huvudsakliga begränsningarna för Finlands inflytande.</p>	<p>S9: UM:s begränsade personalresurser påverkar Finlands EU-inflytande på alla nivåer, vilket också begränsar förmågan att ta till vara nya möjligheter och utgör en risk för framtida påverkan.</p>	<p>R11: Inför ett mer strategiskt och proaktivt förhållningssätt till bemanning inom UM i förhållande till påverkansarbetet gentemot EU:s utvecklingssamarbete, som både tar hänsyn till behovet för prioritering av arbetet och personalbudgeten.</p>
<p>Resultat 1.4.1: Finlands samordning av EU-frågor fungerar generellt sett bra både inom UM och mellan olika myndigheter, men det finns utrymme för organisatoriska effektiviseringar i samband med påverkansarbetet gentemot EU:s utvecklingssamarbete. Ett påtagligt exempel, som sannolikt också kommer att få ökad relevans framöver, är den otydlighet som präglar den interna samordningen av Finlands förhållningssätt till TEI och EU:s nya Global Gateway-strategi.</p> <p>Resultat 1.4.2: Den externa samordningen och samrådet med intressenter såsom den Utvecklingspolitiska kommissionen (KPT) och riksdagen är inte heller så bra som den skulle kunna vara. Detta påverkar transparensen och ansvarsutkrävandet, och berövar UM potentiellt viktigt komplimenterande stöd som kan öka Finlands inflytande på EU:s utvecklingspolitik och utvecklingssamarbete, då dessa intressenter också har sina egna kanaler för att påverka i Bryssel.</p>	<p>S10: När den interna samordningen inte är så stark som den borde vara, uppstår risker, särskilt när nya och viktiga möjligheter uppstår (t.ex. TEI och Global Gateway).</p> <p>S11: Extern samordning och samråd i Finland för att påverka EU:s utvecklingspolitik och utvecklingssamarbete är begränsad, vilket berövar potentiellt externt stöd för finländsk inflytande.</p>	<p>R12: Granska om UM är tillräckligt väl organiserat för att samordna och delta i TEI och EU:s nya Global Gateway, och ta fram en tydlig strategi för att göra det efter behov.</p> <p>R13: Vidta åtgärder för att förbättra transparensen, ansvarsutkrävandet och den externa kommunikationen i förhållande till påverkansarbetet gentemot EU för att uppmuntra intressenter att stödja UM:s insatser på detta område.</p>



Summary

Purpose, objectives and methodology of the evaluation

The Unit for Development Evaluation of the Ministry for Foreign Affairs (MFA) of Finland commissioned a strategic evaluation to assess Finland's development policy influencing in the European Union (EU).

The **purpose** of this evaluation was to assess the relevance, effectiveness and coherence of the different development policy influencing activities by the MFA concerning the EU and its institutions, and to provide guidance to the Ministry on the further strengthening of influencing activities. The evaluation is forward-looking and is intended to help the MFA learn from past experience and apply lessons learnt to improve its results-oriented approach to multilateral influencing.

The main **objectives** of this evaluation were threefold. First to assess how Finland has managed to promote Agenda 2030, Building Back Better (and Greener), and Finland's Development Policy objectives in the EU, as well as the common development cooperation practices and principles by the Member States (MS). Second, to assess the effectiveness of various influencing activities, including influencing outcomes, means and channels and Finland's best opportunities to influence the EU taking into account available human and financial resources. And third to analyse the factors that have facilitated/enabled or hindered the positive results of the influencing activities towards the EU.

In addition, the evaluation was expected to **look forward and provide insights** on the best opportunities and ways to engage and influence in the future, especially under the new EU budget and the evolving development cooperation scene. Equally it was expected to consider how the Ministry and other relevant stakeholders could develop their practices to maximise influencing the EU for the future, taking into account available human and financial resources.

The evaluation **methodology** is embedded in a **theory of change (ToC) framework**, which provides a coherent and logical model that focuses on causal mechanisms. These underpin how and to what extent the MFA's actions (inputs) have led – or are expected to lead – to specific changes (outcomes) in the strategic design and the implementation of EU development policy. In other words, the ToC shows the different steps and how they are built on each other to achieve the objectives of influencing. Three evaluation questions (EQs) each address specific parts of the ToC either at the output or outcome/impact level. Previous evaluation reports and relevant research, such as on Small State Theory, were also used to help develop the approach.

The evaluation followed two tracks of enquiry. Track 1 included the first two evaluation questions: EQ1 on the organisation of the MFA for influencing and EQ2 on the process of influencing. Track 2 with the third EQ 3 on outcomes, studied the MFA's influencing in reverse, by using an **outcome harvesting** process which started by identifying outcomes and then examined how each of them was achieved. This also included an analysis of enabling and hindering factors for EU influencing work.



Data was collected from official documents, public literature and from several sources including:

- One hundred and ten semi-structured **interviews** were conducted in Helsinki, Brussels and elsewhere, with officials from the MFA, the EU institutions and a selection of EU MS.
- Two partner country **case studies** were done for Nepal and Tanzania and a third 'mini-case'³ for Ukraine.
- Three **process cases** on particular events during the evaluation period that constituted important opportunities for influencing: the Finnish EU Presidency in 2019, the negotiation of the new EU NDICI financial instrument, and the response to the COVID-19/Team Europe Initiatives (TEIs).
- A **peer review** was also prepared to compare Finland's experience of EU influencing with a sample of six other small to medium EU MS (Belgium, Denmark, Ireland, Poland, Portugal and Sweden).
- An online **survey** was sent to 13 Finnish embassy and 17 EU Delegation officials covering 14 partner countries to assess views on Finnish EU influencing.
- Finally, the evaluation team drafted five **thematic briefs** to summarise specifically what progress was made on EU influencing in key Finnish policy priority areas (gender equality, governance & human rights, rights of persons with disabilities, education and climate change).

Throughout the process, special emphasis was placed on collecting information on the institutional settings so as to contextualise the findings. Equally, temporal factors were reflected in the analyses, to take into account shifts in policy priorities.

Summary answers to the evaluation questions

EQ1 – To what extent are the MFA's management approaches, arrangements, processes, and tools efficiently organised to maximise Finland's influence from the point of view of development policy and cooperation?

Summary answer: The MFA's EU influencing strategies are coherent with its development policy and generally well understood, but they are complex, not always well focused, and prioritised, nor always farsighted enough. In terms of resources, there is no monitoring of staff time on influencing and some staff are clearly stretched, though there are also some good examples of flexibility in staff deployment. Leveraging of EU funds for Finland occurs, but it is not extensive. External views are positive on the competence and professionalism of MFA staff and organisation. Internal views on roles and responsibilities are more mixed. There are some good instances of informal and ad-hoc reporting, but institutionalised Monitoring, Evaluation and Learning (MEL) systems are almost non-existent.

3 This was originally intended as a third full case study but had to be trimmed down because of the war in Ukraine.



EQ2 – To what extent has the MFA succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU in a relevant, coherent and efficient manner?

Summary answer: Finland's process for influencing the EU on development cooperation is relevant, coherent, reasonably efficient and runs smoothly.

The practical implementation of Finland's policy for influencing the EU generally operates well. Finland makes good use of the opportunities and mechanisms commonly used for this advocacy work. In particular, it works extensively and effectively with like-minded groups and coalitions among the MS, both building them up and maintaining them as required. Finland was generally seen as very adept at building and making use of coalitions. Finland also cooperates well with the European Commission where it is seen as a constructive MS that plays by the rules, has its red lines, but is also willing to be pragmatic, seek consensus and compromise.

Representatives from MS and from EU institutions were uniformly positive in their assessment of the way Finnish officials worked, seeing them as well organised and prepared, professional, honest and approachable. Their long-term iterative approach and solid experience were also commented on favourably. Finland has built up a positive image for itself in development cooperation.

Finland's Presidency of the EU was an important moment during the evaluation period where the MFA officials could showcase their organisational skills. The way this was conducted was widely approved of. Finland regularly and proactively participates in other governance structures in EU settings, be it working groups in Brussels or other EU coordination groups in Europe or in partner countries.

Finland's positions on policy issues are generally well known and it has a well-recognised leading and influential role particularly in the areas of gender equality (sexual and reproductive health and rights (SRHR), transformative approach), human rights-based approach (HRBA), inclusion and support for Africa, all topics aligned with its thematic priorities. Forestry and education are other areas where its expertise is recognised and respected. Equally, its know-how and stance on disability inclusion is recognised, but less prominent, which may partly be explained by the contrasting use made of coalitions in this area (low) relative to gender equality (high). Equally climate action emerged as a less prominent feature of Finland's profile, though this may be because MFA activities in climate diplomacy only increased towards the end of the evaluation period and then more in the UNFCCC (although Finland and the EU do work together in that context).

Some limited instances emerged of EU financial decisions at the partner country level that have clearly been in line with Finnish interests, such as the delegated cooperation funding from the EU for the Finnish water project in Nepal (RVWRMP) or in Tanzania where the latest EU Multiannual Indicative Programme (MIP) alignment with Finnish priorities is reflected in action documents that allocate funding to these areas. In terms of major long-term policy impact the most important EU financial decision consistent with Finnish interests during the period of the evaluation was the maintenance of the same level of official development assistance (ODA) in the new EU Multiannual Financial Framework (MFF) 2021-2027.



EQ3 To what extent has the MFA succeeded in attaining influencing objectives/changes in the EU for the advancement of the Finnish and international development agenda and interests?

Summary answer: In the areas examined by the evaluation 18 outcomes were harvested and systematically analysed in terms of significance. A quarter of them involved policy shifts endorsed by the three key EU institutions and is therefore of major significance. The remainder are of more limited significance and often of a more operational character or policy shifts at a regional or country level.

Gender equality stands out as an area where Finland has achieved multiple outcomes though its ambitions on SRHR were not entirely met. There are also individual outcomes relating to other thematic priorities (e.g. rights of persons with disabilities, education), but no specific outcome on Africa. During both the process moments of the EU Presidency and the NDICI-GE negotiations Finland successfully achieved various outcomes it was seeking.

The 31 detailed findings, 11 conclusions based on the findings and the 13 recommendations made to support the MFA in enhancing its influencing impact on the EU development policy are presented in the table below.



TABLE OF KEY FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p>Finding 3.1: The 18 outcomes identified include several where Finland has succeeded in different ways to influence EU development policy in Council discussions, but also more operational decisions in partner countries. Various outcomes were also achieved during the special circumstances of Finland's EU Presidency in 2019.</p> <p>Finding 3.2: Five outcomes reflect key EU decisions involving a policy shift that is approved by the Commission, Council and Parliament, with active influencing from Finland, alongside other like-minded states. Another thirteen outcomes reflect changes of a more limited scale and significance often at a country level or on programming.</p> <p>Finding 3.3: During the evaluation period the MFA has achieved most of its EU policy influencing objectives on gender equality and education, but its ambition to promote SRHR further was not met.</p> <p>Finding 3.4: While Finland's Presidency was overall a success, no specific outcome was achieved in relation to Africa, despite the EU-Africa partnership being a main priority in Finland's Presidency Programme.</p> <p>Finding 3.5: Finland's positions on the NDICI negotiations were largely achieved in relation to the principle of a single instrument and its geographical and thematic focus. Finland's ambition in terms of stronger language on climate change was not met, however.</p> <p>Finding 2.6.1: In terms of major long-term policy impact the most important EU financial decision that was consistent with Finnish interests during the period of the evaluation was the major achievement of maintaining the volume of ODA in the new EU MFF (2021-2027) (all ODA is now in the NDICI-GE).</p> <p>Finding 4.1: Finland has been able to impact on the EU despite the limited scope for influencing in a system largely shaped by the EU decision-making processes. To do so it built on the relatively strong alignment between its own development policies and those of the EU, used established practices well and took advantage of available opportunities.</p> <p>Finding 4.2: Finland's reputation as a credible development actor and lead expertise in selected areas remain, by far, the two main factors explaining Finland's influencing successes in Brussels and in partner countries.</p>	<p>C1: The MFA's efforts to influence EU development cooperation policy have yielded worthwhile results. A range of significant outcomes have been achieved that constitute a successful achievement for a small MS of the EU.</p>	
<p>Finding 2.4: Interviewees generally felt Finland was clear and visible in its policy positions and that these were well understood by the EU institutions and MS. EU institutions' interviewees often emphasised the commonality of Finland's position with those of the EU and stressed that Finland was a reliable partner in pushing these views in EU debates.</p> <p>Finding 2.5: Finland has a well-recognised leading and influential role, particularly on gender equality (SRHR, transformative approach), HRBA and sustainable use of natural resources. Education is another area where its leadership is recognised and respected. Its expertise on disability inclusion is recognised, but less prominent. Finland has also maintained its reputation as a leader in the forest sector, although it is sometimes seen as reluctant to use the expertise. The increased efforts of the MFA in climate action and diplomacy have raised Finland's profile gradually since 2019.</p> <p>Finding 2.7.1: Overall Finland is widely seen in the development sector, both within the EU and beyond, as a trusted, highly professional and effective actor in development cooperation with whom other EU actors are happy to work.</p>	<p>C2: Finland has succeeded in a coherent, efficient and relevant manner, to promote its own development policy priorities in the EU context though not all of them to the same extent.</p>	<p>R1: The MFA should build on its evident successes in certain areas of influencing EU development cooperation (e.g. gender equality) to help improve its record in other areas (e.g. climate action and disability) where it has had less impact.</p>



TABLE OF KEY FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p>Finding 2.7.2: There is strong evidence from other EU actors that Finland's performance in development cooperation is recognised and respected. Finland's approach is appreciated by the EU not least because it is systematic, iterative and long-term, but is also seen by some officials as relatively cautious.</p> <p>Finding 4.5: Finland's focus on cross-cutting objectives has allowed it to follow a highly consistent, visible, and transparent approach to influencing.</p>		
<p>Finding 1.2.2: Limited Finnish ODA budgets do not seem to be a constraint on influencing, but Finland could do better at gaining access to EU funding. The MFA has undergone the EU pillar assessment enabling it to manage delegated cooperation funds, though it is the only Finnish entity to have done so, which is a constraint on expansion.</p> <p>Finding 2.6.2: There are a few instances of EU financial decisions at the partner country level that are in line with Finnish interests, such as the EU delegated cooperation funding for the Finnish water project in Nepal. These have been positive first experiences requiring some flexibility on both sides, but scaling-up this practice will probably entail more systematic adjustments to Finnish programming procedures.</p>	<p>C3: Finland has made a good start on using EU funds to expand the ODA budgets it manages, but the foundations for increasing use of this EU delegated cooperation appear to be weak.</p>	<p>R2: Finland, should expand the strategic use of EU delegated cooperation funding.</p>
<p>Finding 2.1.1: Coalition building and working with like-minded groups is extensively used by Finland both with well-established like-minded groups of MS and more informally and casually. The practice is also reflected at the level of embassies. Finland is seen by officials from other MS and the EU institutions as adept at coalition building.</p> <p>Finding 2.1.2: On a sector specific level Finland has used working with like-minded state coalitions though not always in a consistent fashion. Thus, for instance, it has invested heavily on EU MS coalitions on gender equality but not on disability inclusion. This may partially explain the very different levels of visibility Finland enjoys in EU development circles on these two topics.</p> <p>Finding 2.2.1: By and large, MFA has demonstrated an ability to combine different influencing channels in a relevant, coherent and efficient manner. Finnish representatives regularly participate in EU governance structures in Brussels or at country level for decision-making, coordination, programme steering or other initiatives.</p> <p>Finding 2.2.2: There are various Finnish nationals in useful positions in the EU institutions, either independently as EU officials or as MFA secondees, and examples of the MFA being proactive in the appointment of Finnish experts for specific tasks. However, overall, there are still too few Finnish nationals working in the EU institutions.</p> <p>Finding 4.3: Forming coalitions with like-minded states has remained an essential tool for EU influencing both when working with the Commission and during Council discussions.</p> <p>Finding 4.4: Other activities and practices contributed to Finland's influencing outcomes, notably: (i) focus on cross-cutting objectives, (ii) highly consistent, visible, and transparent approach, (iii) strong links with the Commission, (iv) use of sector experts and 'strategic' placements, and (v) production of best practice and/or evidence papers.</p>	<p>C4: Finland has successfully used a variety of channels for influencing despite limited resources. In particular, it has made good use of working with coalitions of like-minded states in many though not all areas. On the other hand, the weak presence of Finnish nationals in the EU institutions is a clear handicap for influencing.</p>	<p>R3: Extend the use of coalition-building and working with like-minded states as a key channel for EU influencing and ensure MFA officials are appropriately trained to use this mechanism well.</p> <p>R4: Expand the presence of Finnish nationals in the EU institutions dealing with development cooperation.</p>



TABLE OF KEY FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p>Finding 1.1: While the MFA's EU influencing strategies are generally coherent and well linked to Finland's development policy and EU agenda, they suffer from some lack of clarity on prioritisation, inadequate internal consultation and limited forward planning. Poor information sharing between different parts of the Ministry is also apparent at times.</p>	<p>C5: There is a fairly high degree of variation in the way staff, in different parts of the MFA, perceive priorities in EU influencing. Based on the available plans and guidance not all find it that easy to prioritise both among the EU influencing strategies and objectives nor between them and their other duties.</p>	<p>R5: Improve prioritisation of different objectives within EU influencing including by strengthening internal agreement on their relative importance in the MFA's strategy and operational work.</p> <p>R6: In particular, differentiate more clearly between the needs of EU influencing in Brussels and in embassies and improve clarity on prioritisation in partner-country settings.</p>
<p>Finding 1.1: While the MFA's EU influencing strategies are generally coherent and well linked to Finland's development policy and EU agenda, they suffer from some lack of clarity on prioritisation, inadequate internal consultation and limited forward planning. Poor information sharing between different parts of the Ministry is also apparent at times.</p> <p>Finding 1.5.2: There is an apparent lack of institutional forward thinking and visioning based on lessons learnt and new evidence.</p> <p>Finding 2.3: Finland has a solid track record of using the opportunities in the calendar of EU debates to advance its policy priorities in different ways that are well adjusted to the circumstances and scope of the topic. In particular, the opportunity of its EU Presidency in 2019 was taken very seriously with a well thought through and implemented approach that met with widespread appreciation among interviewees.</p> <p>Finding 4.7: The main internal factors explaining Finland's successful Presidency were in particular careful preparation, good staffing, flexibility and a soft, constructive and inclusive approach to managing meetings and negotiations.</p>	<p>C6: Finland has used the opportunities provided by regular EU processes, such as the 2019 EU Presidency, well to achieve significant outcomes. But some weaknesses on prioritisation and forward planning could jeopardise this good track record going forward.</p>	<p>R7: Develop more forward looking and medium-term influencing strategies that link to EU development cooperation agendas and calendar cycles and, looking further ahead, seek to identify potential new opportunities coming up on the EU agenda that Finland might be well placed to help tackle.</p> <p>R8: Consider urgently how the end of the term of the von der Leyen Commission and the start of a new one, might be best used as an opportunity to consolidate Finnish influencing on EU development cooperation from the past few years, as well as prepare the ground for working with the new Commissioner for DG INTPA.</p>
<p>Finding 1.3: External observers are generally positive on the way the MFA is organised and the autonomy given to staff in Brussels and embassies. Internally the relatively flat organisational structure, limited hierarchy, good autonomy and backup for representatives are seen as positive. Yet there are also mixed views on the setting of roles and responsibilities, on the strength of leadership, on levels of EU knowledge and some lack of clarity on coordination of EU topics.</p>	<p>C7: The way the MFA is organised internally is clearly an important factor in its successful influencing of the EU that has helped enable a good list of outcomes, though there is also scope for improvements and a case for strengthening leadership in certain areas.</p>	<p>R9: Clarify and communicate regularly on roles and responsibilities and ensure consistent leadership on EU influencing among the senior MFA management.</p>
<p>Finding 1.5.1: There is no systematic approach to monitoring and learning lessons on EU influencing, which relies heavily on the continuing presence of experienced individuals. Yet, there are good practices at the level of individual units and teams that do organise to pass on essential knowledge to colleagues, but this is largely done on an ad-hoc basis.</p> <p>Finding 1.5.2: There is an apparent lack of institutional forward thinking and visioning based on lessons learnt and new evidence.</p>	<p>C8: MFA knowledge management processes for influencing the EU on development cooperation are rather informal, with limited systematisation of monitoring and learning and poor links to forward planning.</p>	<p>R10: Establish an organised feedback- and learning-cycle to help support strategizing on EU influencing.</p>



TABLE OF KEY FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

FINDINGS	CONCLUSIONS	RECOMMENDATIONS
<p>Finding 1.2.1: MFA staffing is tight. Interview evidence suggests limited staff time is a constraint on EU influencing work both in Brussels and in the embassies, resulting in missed opportunities and obliging staff to prioritise as carefully as possible. There are also too few Finnish nationals in the EU civil service and notably in DG INTPA.</p> <p>Finding 4.6: Conversely, a lack of prioritisation and limited staff presence were identified by stakeholders as the main internal constraints to effective influencing.</p>	<p>C9: MFA staffing constraints place limits on EU influencing at all levels resulting in missed opportunities and constitutes a risk for influencing going forward.</p>	<p>R11: Take a more strategic and proactive approach to MFA staffing for influencing on EU development cooperation that combines both the needs of the prioritisation of the work and the scope for staff deployment within the limits set by budgets.</p>
<p>Finding 1.4.1: Finland's coordination on EU matters generally works well both within the MFA and across government, but there are also various improvements that could be made to strengthen organisational efficiency for influencing the EU on development cooperation. The most pressing example of this, due to its likely importance going forward, is the lack of clarity on internal coordination on Finland's approach to the TEIs and the EU's new Global Gateway strategy.</p> <p>Finding 1.4.2: External coordination and consultation with stakeholders such as the Finnish Development Policy Committee (KPT) and the Parliament is also not as strong as it could be. This undermines transparency and accountability and deprives the MFA of a potentially useful source of complementary support on influencing EU development policy and cooperation given that such stakeholders also have their own channels for influencing in Brussels.</p>	<p>C10: In places where internal coordination is not as strong as it should be, this creates risks particularly when new and potentially far-reaching opportunities arise (e.g. the TEIs and Global Gateway).</p> <p>C11: External coordination and consultation in Finland on influencing EU development policy and cooperation is limited which undermines potential external support for Finnish influencing in EU external action.</p>	<p>R12: Review whether the MFA is adequately set up to coordinate and participate in TEIs and the EU's new Global Gateway and develop a clear strategy to do so as required.</p> <p>R13: Take steps to improve the transparency, accountability and external communication on EU influencing so as to encourage wider stakeholder support for influencing on EU development policy and cooperation.</p>



1 Introduction

1.1 Purpose, rationale, and main users

The Unit for Development Evaluation of the Ministry for Foreign Affairs (MFA) of Finland commissioned a strategic evaluation to assess Finland's development policy influencing in the European Union (EU).

The **purpose** of this evaluation is to assess the relevance, effectiveness and coherence of the different development policy influencing activities by the MFA concerning the EU and its institutions, and to provide guidance to the Ministry on the further strengthening of influencing activities. The evaluation is forward-looking and should help the MFA learn from past experience and apply lessons learnt to improve its results-oriented approach to multilateral influencing.

The **rationale** derives from the fact the EU is a significant channel for Finland's development policy and cooperation. Finns have held several significant roles and positions in the joint European development arena in the recent past (e.g., EU Presidency in 2019; Jutta Urpilainen as Commissioner, International Partnerships 2019-2024). Finland's influencing activities towards multilateral organisations were evaluated in 2019-2020. However, the development policy influencing activities concerning the EU have not yet been evaluated at the strategic level. Hence, the evaluation makes a contribution to wider lessons learnt on the Ministry's development policy influencing activities overall, based on these two evaluations. The evaluation also considers the recent processes and developments that led to the development of the NDICI (Global Europe: Neighbourhood, Development and International Cooperation Instrument) and the development cooperation objectives. Therefore, within certain limits⁴, this evaluation seeks to inform the Ministry on how to engage with the EU during the new NDICI era in the most influential ways.

The **main users** are the Ministry's leadership, departments and representations in charge of design and implementation of development policy and cooperation and EU development policy relations, influencing and negotiations, as well as the Finnish agencies involved in the implementation of EU funded development cooperation programmes. Other relevant users are the government of Finland actors engaged with EU coordination and relations, the Parliament (especially Foreign Affairs Committee), and the Development Policy Committee.

⁴ Only possible to a certain extent, see Section 2.3 on Limitations.



1.2 Objectives

The **objectives** of this evaluation are:

- To assess how Finland has managed to promote the Agenda 2030, Building Back Better (and Greener), and Finland's Development Policy objectives in the EU, as well as the common development cooperation practices and principles by the Member States (MS).
- To assess the effectiveness of various influencing activities, including influencing outcomes, means and channels and Finland's best opportunities to influence the EU (institutions and bodies, country delegations, interventions etc.) taking into account available human and financial resources.
- To analyse the factors (structures, processes, tools, capacity, other) that have facilitated/ enabled or hindered the positive results of the influencing activities towards the EU.
- To provide insight on the best opportunities and ways to engage and influence in the future, especially under the new EU funding instrument and the evolving development cooperation scene.
- To provide insight into how the Ministry and other relevant stakeholders could develop their practices to maximise influencing the EU for the future, taking into account available human and financial resources.

1.3 Scope

The evaluation primarily focuses on Finland's influencing of the EU's development policy and cooperation but also goes beyond the aid agenda, by including:

- Finland's influencing of the European Neighbourhood Policy (ENP);
- Broader foreign and security policy from the point of view of coherence⁵;
- The Ministry's approach to the 'Policy Coherence for Development' (PCD) agenda;
- The framework of Finnish influencing of the EU is defined by the MFA 2018-20 multilateral influencing plan, which states: *"The EU and the Member States (MS)...*
 - *...will implement the Agenda 2030 on Sustainable Development Goals (SDGs) comprehensively and strategically in development policy, by combining the three dimensions of sustainable development in a balanced and coherent way and*
 - *... apply the principle of policy coherence for sustainable development (PCSD) and take the objectives of development cooperation into account in all their internal and external policies that may affect developing countries".*

⁵ Only possible to a certain extent, see Section 2.3 on Limitations.



The evaluation covers all levels of engagement in the Ministry and its work with the EU, ranging from the various positions in Helsinki to the embassies and delegations in Brussels and partner countries. The methods and principles used by Finland to influence EU development policy in a broad sense are evaluated with regard to various fields of development policy and cooperation under the administration of the MFA. The practices used by Finland to engage in EU decision-making are assessed. Equally, the processes and developments that have led to the new financing instruments and programming, Finland's engagement and contributions therein as well as abilities to promote and secure its interests, are included in the scope of the evaluation.

The evaluation does not assess:

- Finnish influence on DG ECHO (humanitarian assistance);
- Influencing through Finnish Civil Society Organisations, which operate independently and cannot be seen as serving the interest of the MFA;
- The extent to which EU shared commitments and the development cooperation agenda have come to shape the Ministry's development cooperation agenda;
- The extent to which the Ministry has successfully influenced relevant national policies through other means than via the EU.

The evaluation mainly focuses on the period of 2014-2021. This covers the period of the EU's fifth multiannual financial framework (MFF) and multiannual indicative programme (MIP) of 2014-2020, including the adoption of the new European Consensus on Development (2017) reflecting the SDGs, and the negotiations leading towards the new financing instruments; the funding cuts of the Finnish development cooperation budget in 2015; and Finland's EU Presidency in 2019. The beginning of the 2021-2027 funding period is also considered, including the most recent developments such as the introduction of the NDICI and the COVID-19 response.



Box 1 Definitions used in this evaluation

This evaluation largely follows the definition criteria developed by the Evaluation of Finnish Development Policy Influencing Activities in Multilateral Organisations (henceforth MO Evaluation, (Palenberg et al., 2020)). However, the EU as a supra-national organisation is based on a specific set of institutions and, as a well-integrated MS, the Finnish government wields a certain authority within them that is different from Finland's position within global multilateral organisations which are characterised by inter-governmental cooperation but not supra-nationality. Some adaptations of the definitions and criteria for the MO Evaluation have thus been applied. Moreover, as a small state within a group of 27 MS (28 for much of the temporal scope), some of which have considerably more resources and power, Finland faces particular challenges and opportunities within the EU. Thus:

- 1) We define **influence** as the power to have an effect on people or things. In this evaluation we are especially interested in the MFA's influence. This influence originates from past and present behaviour of MFA staff, from information shared by the MFA in different ways with the outside world and from the image that this creates of Finland in the outside world.
- 2) Usually, the relationship between influencing activities and influencing effects is not monocausal. So, whereas MFA initiated influencing activities may have **contributed**⁶ to an effect, it is likely that many other influences, influencing activities, as well as other factors and conditions did too. In the EU context, in particular, there were 27, and now 26, other MS in addition to Finland, all seeking to influence the EU to a greater or lesser extent.
- 3) Influencing **goals** are broad strategic objectives that explain the ultimate purpose of influencing activities, for example contributing to an increase in the operational effectiveness of the conduct of EU development cooperation or inducing changes in how its work is prioritised thematically.
- 4) Influencing **objectives** are more concrete, tangible and short-term than influencing goals and, ideally, are specific, measurable, attainable, relevant and time bound. Immediate influencing effects on people, policies or operations are at the level of influencing objectives, whereas influencing goals correspond to the outcomes and impacts to which these effects contribute.
- 5) Correspondingly, **influencing strategies** are high level plans to achieve one or more influencing goals over an extended period of time and with a coordinated set of influencing activities. **Influencing plans** are concrete and actionable documents that explain how and when one or more influencing objectives can be reached through certain influencing activities, and how this can be monitored.
- 6) The concept of '**small state**' has been explored in academic literature. Research on **Small State Theory** (SST), as it is known, offers a relevant conceptual framework that can help explain the motivations and particular types of influencing action that such states may undertake.

6 It should be noted that influencing effects on the EU's development policy and cooperation may not always be clearly associated with Finland's influence because they strongly depend on various factors within the complex organisational setting of the EU, the evolving context in which they operate, and the priorities and activities of other actors, particularly other Member States. Hence, attribution will be more difficult to prove than contribution.



- 7) With the term **EU**, we refer to any of the institutions in the scope of this evaluation. Formally the term EU also refers to the EU institutions and MS acting together. To avoid ambiguity this report uses the more cumbersome but clearer term '**EU as a whole**' in such cases.
- 8) When referring to different **organisational levels within the EU**, we use the following terms to indicate levels at which people have certain responsibilities, at which policies are prepared, adopted or applied, or at which operational decisions are prepared, taken or implemented:
 - The governance level – the Council, its working groups, the rotating EU Presidency of the Council and the European Parliament;
 - The headquarters level – the European Commission (DGs/Directorate-General: INTPA/International Partnerships, and NEAR/Neighbourhood) and the European External Action Service (EEAS);
 - The country level – the EU Delegations in each partner country;
 - The individual staff level – officials of the EU institutions – Commission, EEAS and European Parliament.
- 9) With the term **MFA**, we refer to the institution as a whole, that is the Ministry in Helsinki, its embassies, and its permanent missions. We use slightly adapted or simplified **organisation levels** within the MFA. Thus, sources of influence and influencing activities can originate from different hierarchical levels within the MFA:
 - The political leadership level (Ministers);
 - The MFA senior management (Secretary of State, Undersecretaries of State, Department Directors, Department Deputy Directors);
 - The unit level within the MFA;
 - The Embassy and mission (e.g., Permanent Representation in Brussels or 'Perm Rep') level,
 - The individual staff level.

Source: Evaluation team



2 Approach, methodology and limitations

The evaluation methodology and framework including a discussion on the theory of change (ToC), the evaluation questions (EQs) and the evaluation matrix are provided in Annex 3. Key points from this longer description are outlined below for convenience.

2.1 Approach and methodology

The evaluation is embedded in a **ToC framework**, which focuses on causal mechanisms or more specifically an understanding of how and to what extent the MFA's actions (inputs) have led – or are expected to lead – to specific changes in the strategic design and the implementation of EU development policy. The ToC provides a coherent and logical model or framework that explains and visualises (see Figure 6 in Annex 3) how the influencing activities contribute to a chain of results that generate intended or observed outcomes and impacts. In other words, the ToC shows the different steps and how they are built on each other to achieve the objectives of influencing. Each of the three EQs addresses specific parts of the ToC either at the output or outcome/impact level.




Within this overall framework, the evaluation is based on **five guiding principles**:

- First, it is **results-based**: the team analyses the actions of the involved stakeholders (i.e., all inputs by the MFA and other relevant Finnish actors directed at the influencing of the EU development policy and cooperation) and the results achieved based on these actions.
- Second, it is **outcome-oriented**: the team analyses the perceived and actual outcomes and impacts of influencing and thus assesses the effectiveness of the Finnish approach.
- Third, it is **process-oriented**: the team analyses the kind of processes – both in quantitative and qualitative terms – that the MFA initiated and followed to achieve outcomes. This includes an assessment of the efficiency of the chosen approaches to influencing.
- Fourth, it is **evidence-based**: the team applies a mixed-methods approach combining quantitative and qualitative data collection and analysis. Since influencing cannot easily be captured in quantitative terms **most of the evidence will be qualitative**.
- Fifth, it is **utilisation-focused**: the evaluation is conducted in such a way as to promote the use and operationalisation of findings. For this evaluation, it also implies focusing on **forward-looking analysis** that can contribute to future planning.

The evaluation follows a **dual track methodological approach** to strengthen the robustness of findings. The objectives of Finnish influencing are relatively clearly described in the influencing plans which define what MFA influencing aims to achieve in relation to EU development policy and cooperation. Thus, the team will assess **progress towards the predetermined anticipated outcomes and impacts of influencing (Track 1 – EQ1 and EQ2)**. At the same time, the team



will also pursue research in the opposite direction through **outcome harvesting (Track 2 – EQ3)**: evidence will be collected of what has changed in EU development policy and cooperation in the areas defined by the Ministry’s influencing plans for the EU, and then, working backwards, the team will determine how and to what extent Finnish influencing contributed to the main changes. The outcomes can be intended or unintended, direct or indirect, but the connection between the intervention and the outcomes should be plausible. The analysis of the progress towards the *pre-determined* anticipated outcomes and impacts of influencing allows identifying those efforts and outputs that did not lead to any significant outcomes.

THREE MAIN EVALUATION QUESTIONS (EQs):	
	EQ1: To what extent are the MFA’s management approaches, arrangements, processes, and tools efficiently organised to maximise Finland’s influence from the point of view of development policy and cooperation?
	EQ2: To what extent has the MFA succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU in a relevant, coherent and efficient manner?
	EQ3: To what extent has the MFA succeeded in attaining influencing objectives/changes in the EU for the advancement of the Finnish and international development agenda and interests?

An evaluation matrix was built up from these three EQs with a number of judgement criteria (JCs) and possible relevant indicators formulated for each one (see Table 5 in Annex 3). The matrix was then used as the basis for structuring interviews (combined with the interview guide presented in Annex 8) and data collection in general. For EQ3 on outcomes these then had to be adapted to suit the outcome harvesting methodology.

Choice of judgment criteria for the outcome harvesting: In line with the outcome harvesting methodology (see Annex 3), the JCs for analysing the selected outcomes under EQ3 were revised. This provided the basis for a better analysis of whether the outcomes identified were ‘real’ outcomes which required significant influencing work to achieve; whether they matched up with the MFA’s influencing objectives and finally how they were achieved in practice (enabling and hindering factors) as this was considered important in terms of learning lessons.

Although these JCs are different from those originally suggested they are rooted in the original ones and pick up many of their features such as the significance and the nature (operational/policy) of the change. Significance was also an important part of the analysis in the MO evaluation, although a different rating system suited to the EU has been devised. The distinction between immediate and long-term objectives proved difficult to distinguish clearly so was dropped.



2.2 Methods of data collection and analysis

Data was collected from several sources as follows. Relevant intermediary reports for these sources are provided in Volume 2.

- 110 semi-structured **interviews** constituted one of the principal and most valuable sources of data. A good number of face-to-face interviews were conducted in Helsinki and Brussels, and more online in both these cities and elsewhere, with officials from the MFA, the EU institutions and a selection of MS. Relevant persons from other organisations were also interviewed. Interviewees were chosen to get a broad range of views, but also to verify data from one source against another. Past holders of certain key positions were also included to ensure the evaluation timeframe was well covered. In some cases, repeat interviews or follow up by email to check details was also done. A full list of interviewees is provided in Annex 10.
- Two partner country **case studies** were done for Nepal and Tanzania and a third 'mini-case'⁷ for Ukraine. Reports from these cases are provided in Volume 2.
- Three **process cases** relating to particular events during the evaluation period which were deemed to constitute important opportunities for influencing: the Finnish EU Presidency in 2019, the negotiation of the new EU NDICI financial instrument, and the response to the COVID-19/Team Europe Initiatives (TEIs), were also examined. These are written up in short briefs that are presented in Volume 2.
- An **extensive review** of relevant Finnish and EU documents on development policy and cooperation was also conducted. Documents included policy/influencing objectives and positions of both, strategy and programming documents, guidelines, internal reporting, reviews, evaluation reports, other reports, emails (to the extent possible) as well as previous evaluations and reports on influencing. A full bibliography is provided in Annex 9.
- A **peer review** was also prepared to compare Finland's experience of EU influencing with a sample of six other small to medium EU MS (Belgium, Denmark, Ireland, Poland, Portugal and Sweden). The peer review report is provided in Volume 2.
- An online **survey** was sent to Finnish embassies in 15 partner countries and the corresponding 15 EU Delegations seeking to assess views on Finnish EU influencing and partly quantify their strength. The survey report is provided in Volume 2.
- Five **thematic briefs** were also drafted by the evaluation team to summarise specifically what progress was made on EU influencing in key Finnish policy priority areas (gender equality, governance & human rights, rights of persons disabilities, education and climate & forests). These briefs are presented in Volume 2.

Throughout the process, special emphasis was placed on collecting information on the institutional settings to allow contextualising the findings emerging from the exploration of the various sources. In addition to contextual factors, temporal factors are reflected in the analyses, to take into account shifts in policy priorities.

7 This was originally intended as a third full case study but had to be downsized because of the Russian invasion of Ukraine.



Data analysis proceeded in stages writing up notes from individual sources, collating these using the evaluation matrix for the different intermediary products listed above (case studies, briefs, reports, etc.) and then synthesising them from across all these products. Throughout this process evidence from different sources was carefully compared and triangulated, to ensure robustness and guard against confirmation bias. Interviews were usually done by two team members together and notes cross checked afterwards. Specific claims made, for instance in the outcome harvesting process, were cross-checked through additional interviews or documentary evidence. The synthesis phase was devoted to finalising the answers to the evaluation questions and formulating conclusions and recommendations based on the data collected and findings identified throughout the process.

2.3 Limitations

A list of potential risks with proposed mitigation strategies is presented in Annex 3 (Table 11). They include lack of institutional memory among interviewees, positive bias in outcome harvesting, limited meaningful engagement by stakeholders, and limited cooperation by EU stakeholders).

The main limitation that arose in the execution of the case studies was the restriction on access to interviewees resulting arising from the Russian invasion of Ukraine in February 2022. The Ukraine study therefore had to be downgraded as an insufficient number of interviewees were available, and in particular no EU institutional interviewees, making triangulation of data impossible. Both the Nepal and Tanzanian studies progressed well, however, with the minor issue of no survey responses being received in the latter.

The identification of a group of a similar EU MS for the peer review involved a number of steps to arrive at a representative sample that are discussed in the report. One of the seven chosen countries declined the invitation to participate, but the resulting group still remained adequate both in terms of having some countries similar to Finland in various respects and some outliers to broaden the scope.

The main limitation of the survey was the small size of the sample with only 15 responses on the 30 invitations sent out. Care therefore had to be taken in the interpretation of some of the results. This is explained in each case in the survey report (Volume 2).

Otherwise, two further limitations emerged during the research, with the data collected not proving to be adequate in two areas. The first related to one of the objectives of the evaluation and the second to an aspect of the scope of the evaluation:

1. In the first case one of the evaluation objectives asked for insights “*on the best opportunities and ways to engage and influence in the future, especially under the new EU funding instrument*”. Given that the NDICI instrument was new at the time of data collection, interviewees were still unsure how it would work in practice. So, this question can only be discussed in general terms based on past practice under the old MFF instruments (Development Cooperation Instrument (DCI), European Neighbourhood and Partnership Instrument (ENPI), etc.).



2. The second gap was in relation to the Ministry's approach to the PCD agenda. Given the potentially extensive range of this question that relates to the impact of other EU (and Finnish) external policies and their impact on the development cooperation agenda, it was not possible to cover this systematically in this evaluation. The hope was therefore that insights on policy coherence issues would emerge from the discussion on the influencing agenda. Obvious areas where this might have happened would have been in relation to policies on, for instance, trade, security, migration or climate. Yet none of these topics that regularly result in policy incoherence gave rise to extensive discussions in interviews or in the influencing documents reviewed. One hypothesis for explaining this could be that Finnish policy on these topics is closely aligned with that of the EU and therefore the need to influence did not arise in any prominent way.

One further note of caution relates to the fact that Finland's positions and policy objectives on development cooperation are often very similar to those of the EU. This was brought up in a good number of interviews particularly with Commission officials and may even indicate some positive bias towards Finland on their behalf. Officials from other EU MS, though often in agreement with Finland's positions, were less inclined to suggest their government shared the same policy as Finland. What is also true is that given these similarities in views, the results of Finnish influencing, particularly when dealing with policy documents often seem like issues of detail or nuance rather than major issues of substance. One might think therefore that Finland's influencing has little value. Yet not all EU MS governments think alike and on some issues there are clearly major and even growing differences. Thus, helping the Commission maintain the status quo in the face of opposition from different quarters is often a meaningful outcome in itself. On the reverse side the fact that EU officials apparently do feel that Finland often has similar positions to their own, probably also increases Finland's leverage in its influencing of the EU.



3 Contextual highlights

A fuller contextual analysis is provided in Annex 4. Some of the key highlights have been summarised here.

3.1 Global context

The period covered by this evaluation (2014-2021) comprises some significant advances in international thinking on development cooperation and the broader context for development. In particular, 2015 was the year of the three major UN summits on the 2030 Agenda, Financing for Development (3rd UN FfD Conference) and the Paris Climate Agreement. These frameworks set the global context for development and climate action over the next decade and a half. Furthermore, towards the end of the evaluation's coverage period, the world was also widely affected by the COVID-19 pandemic with its devastating global social and economic impacts. While the effects of the pandemic varied across different continents and regions, there is no doubt that it reversed progress on poverty reduction and development in many parts of the Global South. Some 97 million people were pushed back into poverty, according to some estimates (Sánchez-Páramo et al., 2021) This enormous setback caused by the pandemic has therefore prompted governments and development organisations worldwide to reassess and recalibrate their development plans and assistance.

3.2 EU Context

3.2.1 General introduction

The EU and its MS are the world's largest donors of development and humanitarian assistance, providing about 50% of global official development assistance (ODA). Thus, development policy is a prominent part of the EU's external relations and the EU's role as an international actor.

The EU donors consist of four major donors (Annex 4, Figure 8): Germany, France, the UK⁸ and the EU itself. There are then ten medium-scale donors⁹, including Finland, shown on the graph. The remaining fifteen have small Official Development Assistance (ODA) budgets, which consist principally of their contributions to the ODA budget of the EU. EU ODA rose dramatically in the 2000s to fulfil the commitments the EU group made at the 1st UN Conference on Financing for Development in Monterrey in 2002. Then, it suffered a setback after the 2008 financial crisis. However, ODA levels recovered again in subsequent years for the EU and many Member States.

8 The UK left the EU in 2021 and therefore contributed to the full period of the EU 2014-2021 MFF.

9 10 medium-scale donors: Sweden, Netherlands, Italy, Spain, Denmark, Belgium, Austria, Finland, Ireland and Poland.



In its 2020 Annual Report (EU, 2020) DG INTPA reported that in 2019, the EU and its MS provided EUR 75.2 billion (EU share EUR 13.2 billion) in ODA¹⁰, which covers more than half (55.2%) of total global assistance. Of Finland's total ODA, EUR 223 million were allocated through EU institutions (22 % of total Finnish ODA) in 2019.

Development cooperation is termed a 'shared competence' in the EU whereby EU MS continue with their bilateral programmes alongside the EU programme managed by the Commission. The EU Treaty stipulates in Art. 208 (EU, 2016) that the EU and its MS should coordinate and seek complementarity in running these parallel development programmes. In addition, the Treaty expects them to promote policy coherence between all their different policies (both internal and external to the EU) that could impact international development.

The MS, including Finland, jointly agree on the common practices and principles that guide the implementation of development policy by all EU MS. At the overall policy level, these were most recently agreed upon in the '2017 European Consensus on Development' that incorporated the objectives of the 2030 Agenda into EU development policy, thereby updating the earlier '2005 Consensus'. Further, more detailed development policy commitments in specific areas are agreed upon from time to time by the Council after discussion in its working groups and based on proposals from the Commission.

Finland joined the EU in 1995. It has therefore been part of the debate on EU development policy since before the moment this really intensified with the reform of EU external assistance in 2001 under the leadership of Poul Nielson, the Danish EU Commissioner for Development from 1999 to 2004. This period has therefore included Finnish involvement in the agreement on the two versions of the 'Consensus', the first conceptually linked to the UN MDGs, the latter to the SDGs, that are also central to EU and Finnish development policy. Finland's current influencing of EU development cooperation policy therefore builds on the foundations of more than 20 years of EU debate, in which Finland has played an active part. EU development cooperation policy is thus already close to that of Finland and nominally at least both of their policies, and indeed those of all the other 26 MS, are rooted in the 'European Consensus'. As such, influencing during the period of the evaluation, which covers the latter third of these years, is largely about refinements to the existing strong common policy framework rather than about major changes or dramatic breakthroughs.

3.2.2 Financial framework

The EU budget or MFF, to which all the MS contribute, provides the funds for the EU development programme managed by the Commission. During the evaluation period, a first MFF covered the years 2014-2020, and a second one was negotiated and agreed upon for 2021-2027. Total external assistance of EUR 79.5 billion¹¹ for the seven years available in the new MFF comes under one budget instrument, the NDICI-GE (Neighbourhood, Development and International Cooperation Instrument – Global Europe). In the previous MFF (2014-2020), the equivalent amount was slightly lower at EUR 69 billion, but it was spread over nine different instruments. These included the European Development Fund (EDF), which traditionally stood outside the EU budget as the financial protocol to the ACP-EU Cotonou Partnership Agreement and its predecessors, the Lomé Conventions. The EDF with an allocation of EUR 30.5 billion (2014-2020) (EC, 2013) was by far the largest element of the EU's external assistance budget but two other instruments were also

¹⁰ OECD ODA stats for 2019 record higher amounts in USD for EU as a whole: USD 80.5 billion, and for EU institutions: 15.1 billion. For 2020 these had risen to EU as a whole: USD 96.3 billion, and EU institutions: USD 20.8 billion.

¹¹ In current prices; the amount in 2018 fixed prices is EUR 70.8 billion.



important: the Development Cooperation Instrument (DCI), and the European Neighbourhood Instrument (ENI).

The EU's development funding is allocated through several funding modalities. *Grants* are direct financial contributions provided to governments or other organisations or projects carried out by them. *Budget support* aims to finance partner countries' development strategies and/or strengthen specific systems through direct financial support to national budgets. *Blending* combines EU grants with *loans* or equity from public and private financiers.

3.2.3 EU governance and processes

For this evaluation, the most important EU institutions are the four main decision-making institutions which lead the EU, that is the Council of the European Union, the European Commission, the European External Action Service (EEAS) and the European Parliament.¹²

The **Council of the European Union** or, in short, 'Council' or 'Council of Ministers' (*Euroopan unionin neuvosto*), is one of the two legislative bodies of the EU. The Council and the European Parliament amend and approve or veto proposals presented by the European Commission. Each MS holds the Presidency of the Council of the EU for a period of six months on a rotational basis.

The Council also encompasses the preparatory bodies COREPER I and II. COREPER stands for the 'Committee of the Permanent Representatives of the Governments of the MS to the European Union'; they examine all topics that are included in the Council's discussion agenda. COREPER prepares meetings of the Ministerial level Foreign Affairs Council (FAC). Over 150 specialised working parties and committees of MS participate in the Council's preparatory work. Examples include the 'Working Party on Development Cooperation and International Partnerships' (CODEV-PI) and the 'Africa Working Party' (COAFR).

The role of the **European Commission** (*Euroopan komissio*) is to act as the executive body of the EU. It operates with 27 Commissioners headed by a President. The European Commission is organised into Directorates-General (DGs). Development cooperation and policy are dealt with in DG INTPA (International Partnerships) currently under the leadership of the Finnish Commissioner Jutta Urpilainen.

The **European External Action Service** (EEAS) (*Euroopan ulkosuhdehallinto*) provides support to the High Representative for Foreign Affairs and Security Policy (HR/VP) of the EU. The HR/VP is President of the Foreign Affairs Council and Vice-President of the Commission. The role of the EEAS is to coordinate the EU's Common Foreign and Security Policy, including the Common Security and Defence Policy (CSDP).

The **European Parliament** (*Euroopan parlamentti*) is the other legislative body of the EU, together with the Council of the EU. At present, 705 Members of Parliament, elected directly by the citizens of the MS, adopt European legislation. 14 members represent Finland in the European Parliament.

The **Presidency of the Council** rotates among the EU MS every 6 months. During this 6-month period, the presidency chairs meetings at every level in the Council, helping to ensure the continuity

¹² For more information on the EU institutions, see the EU's website (2022b) https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/types-institutions-and-bodies_en



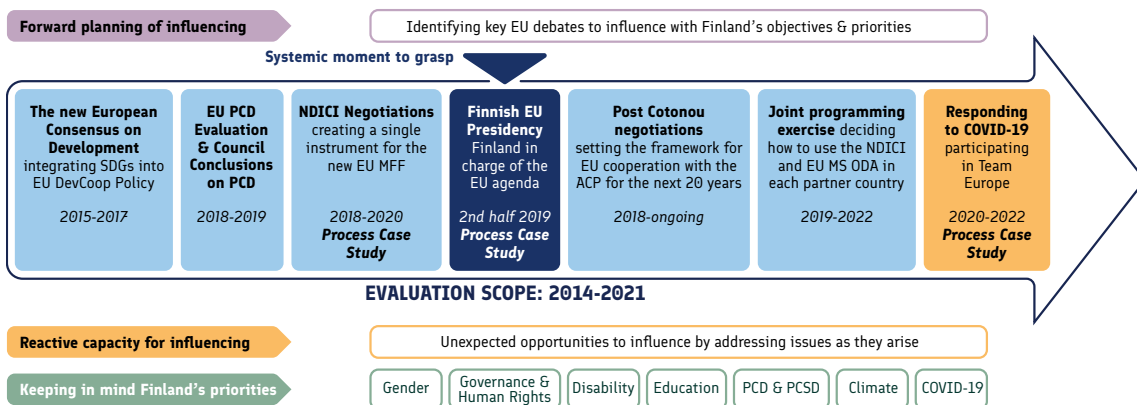
of the EU's work across all areas, including development cooperation. While the Presidency chairs policy groups (e.g., CODEV-PI), the EEAS chairs meetings of geographical groups (e.g., COAFR) just as the HRVP chairs the Foreign Affairs Council. Holding the Presidency therefore requires additional resources and staff mobilisation to prepare and chair COREPER and all relevant working groups.

As development cooperation is an area of shared competence in the EU, **decisions** are rarely legally binding, unless they have links with the EU budget which require legislation approved by the Parliament and Council. Decision making on EU development cooperation and policy at the level of **Council** is normally by **consensus** without a vote. Should a vote be required this would typically be with a qualified majority (55%) or unanimous vote. Successful influencing therefore requires building up support among groups of MS.

3.2.4 Timeline of key events

Within the EU context, several key events and policy debates on international development cooperation took place during the evaluation period. A few of these were considered essential for Finnish EU policy influencing and are represented in Figure 1 below.

Figure 1 Moments in time: Opportunities for influencing EU debates & processes



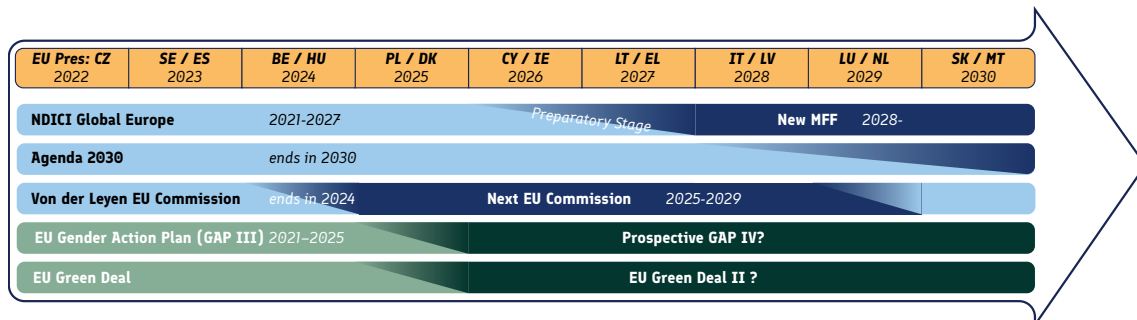
Source: Evaluation Team

As indicated in Figure 1 and explained in Annex 3, the evaluation has chosen three of these opportunities as 'process cases' because of their prominence as moments for influencing during the evaluation period.

Looking a few years into the future (Figure 2), upcoming events include significant milestones in EU development cooperation and policy influencing. Other moments such as the renewal of the 'Consensus' or the EU Global Strategy are more difficult to predict as they do not have a specified lifespan. However, the next 5-10 years will cover at least the implementation of the NDICI-GE 2021-2027 financing framework, different Presidencies of the Council of the EU by both large MS but also by some with more traditional views on development (and particular issues related to gender equality) than Finland, the ending of the current EU Commission's 5-year term (2019-2024), and an update to Agenda 2030. All these can be important moments for influencing the EU.



Figure 2 Some significant near-future milestones relevant to influencing EU's development cooperation



Source: Evaluation Team

3.3 Finland's EU influencing policies

It is important to note that although this evaluation is concerned only with influencing EU development policy, this takes place in a broader framework of general Finnish influencing the EU. The following sections describe the hierarchy, from Finland's government programmes to specific thematic policy papers. The layers are visualised in the form of two timelines encompassing policies covering MFA's EU development policy influencing, MFA's general EU influencing, and the entire government's EU influencing (see Figure 9 and Figure 10 in Annex 4).

3.4 EU influencing policies at the level of the whole Finnish Government

The highest level framework outlining Finland's EU influencing policy is described in the Government Programmes (Finnish Government, 2014, 2015, 2019d). Similarly, the Finnish Foreign and Security Policies establish the general vision of Finland's relationship with external actors, including the EU and other multilateral configurations (MFA, 2018f).

The types of policy documents that define specific EU influencing objectives covering the entire Government have varied over the years. In 2013 and from 2016 to 2018, the Government published annual EU Policies (Finnish Government, 2013, 2016a, 2016b, 2017). However, in 2014-2015, the plans were based on the Presidency of the Council of the EU of different MS. Thus, the scope of each strategy was only six months. In 2019 and 2020, no updates were announced. The current government-wide EU influencing policy is titled 'Government Report on EU Policy 2021: Strong and united EU – towards a more sustainable European Union' (Finnish Government, 2021a). The document was launched in 2021 and is expected to remain valid for several years. Finland's Africa Strategy is another recent policy document that includes provisions on Finland's approach to dealing with the EU in the context of the Union's external relations (Finnish Government, 2021b).

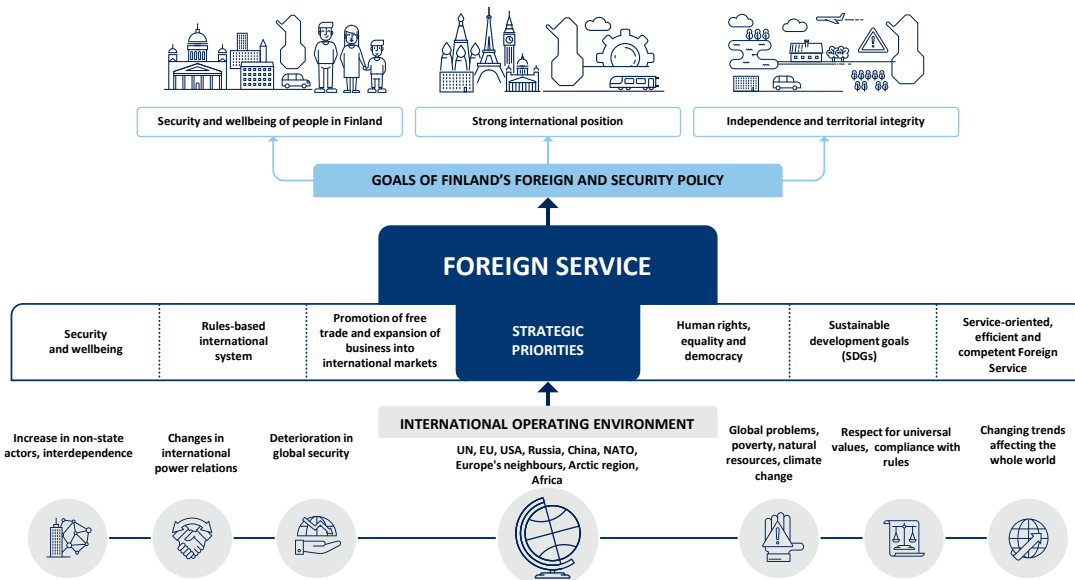
3.4.1 MFA's EU influencing policies

The MFA's general policies, operational plans, and budgets are described in the Strategic Priorities of the Foreign Service (MFA, 2018f) and the Operation and Budget Plans (*toiminta- ja taloussuunnitelma*, TTS) (MFA, 2022f). They are consistent with the higher-level government-wide policies;



Finland's vision is to support security and wellbeing, a rules-based international system, free trade, human rights, equality, democracy, and the SDGs (see Figure 3).

Figure 3 Strategic priorities of Finland's foreign service 2018-2022



Source: MFA (2018f)

MFA's Annual Financial Reports (*tilinpäätös*) (MFA, 2022e) include brief accounts of the Ministry's achievements against the targets defined in budget implementation documents (*talousarvion toimeenpanoasiakirjat*) (MFA, 2022d). They include matrices regarding the level of achievement (achieved, partly achieved, not achieved) of different objectives of which several relate to EU influencing, including brief justifications. While these reports provide a useful summary of actions implemented in that year, they remain self-assessments.

In addition, the MFA has formulated more specific EU influencing plans for 2019, 2020-2021, and 2022. These are brief documents that outline priorities across different lines of action. The EU influencing plan in 2019, which was the year of the Finnish EU Presidency, listed seven specific areas for influencing: the EU's role as a provider of security, stability in the EU neighbourhood, Arctic policy in the EU, managing migration and influencing the underlying causes, an open and rules-based trading system, the EU-Africa partnership and effective implementation of EU development policy.

However, the 2020-2021 and 2022 EU influencing plans were less focused than their predecessor. The first one covers the EU's external influence, partnerships, resilience and recovery, values and some EU operational issues. The second is more open with a long list of 19 items, including both specific EU policies (strategic Compass, climate, gender equality) and more practical issues (use of deputies to replace the HR/VP on specific tasks), including particular Finnish concerns (EU use of Finnish experts).



3.4.2 Finland's development policy

Finland's approach to influencing EU development policy and cooperation is rooted in its development policy priorities. For the evaluation period, these are outlined in two **Development Policy Programmes** from **2012** and **2016**, of which the latter is key as it covers most of the evaluation period. The 2016 programme explains that the SDGs guide Finland's development policy, and its core goal is poverty eradication. It also identifies four priority areas: (i) the rights of women and girls, (ii) partner country economies generating jobs, livelihood opportunities and well-being, (iii) partner country societies becoming more democratic and better functioning, and (iv) food security, access to water, energy and natural resources are used sustainably.

Furthermore, the 2016 Development Policy Programme underlines the importance for Finland of membership in the EU and the objective it has to influence the EU's policies:

- *“Within the European Union, Finland influences development policy decisions and promotes the principle that the consequences of EU action for developing countries be considered more broadly. EU decisions and agreements in fields such as taxation, trade and agriculture [...] carry major immediate or indirect consequences for developing countries.” (p.28)*
- *“Finland works actively to promote the realisation of its development policy goals through EU action. As a member of the EU, Finland influences the future of international development policy and participates in the formulation of development cooperation all over the world.” (pp.30-31)*

The new government since June 2019, endorsed the development policy framework created by its predecessor prompting the MFA to publish a document titled **'Theories of Change and Aggregate Indicators for Finland's Development Policy 2020'** (MFA, 2020d). This draws together the work implemented from 2016 through 2019 on defining the activities, outputs, outcomes, and impacts of the four policy priority areas (Priority Area 1: Rights of Women and Girls, Priority Area 2: Sustainable economies and decent work, Priority Area 3: Education and peaceful democratic societies, Priority Area 4: Climate and natural resources), including their corresponding indicators.

The gist of the 2016 Development Policy Programme is placed in a long-term context in the **'Report on Development Policy Extending Across Parliamentary Terms'** (MFA, 2021c). This aims to consolidate the longstanding nature and coherence of Finland's development policy and coordination. The report highlights the importance of maintaining an active role in the EU in the context of development policy and cooperation in line with Finland's priorities. Efforts to strengthen policy coherence and engaging in Team Europe efforts are mentioned specifically.

Furthermore, in parallel with the clarification of Finland's Development Policy Programme 2016, the MFA developed a **"Guideline for the Cross-Cutting Objectives in 2020"** (MFA, 2020b). While gender equality, reduction of inequalities, and climate change have been cross-cutting objectives for Finland over the years, the new *Guideline* provides more specific definitions of the themes.

The cross-cutting objectives defined in 2020 are (i) gender equality, (ii) non-discrimination with a focus on persons with disabilities, and (iii) climate resilience and low emission development. The 'Report on Development Policy Extending Across Parliamentary Terms' also introduced a fourth cross-cutting objective on *"protection of the environment, with an emphasis on safeguarding biodiversity"*. In this evaluation, we have thus broadened the third priority to encompass topics broadly



under the concept of climate change. This thematic area can also include the recent prioritisation given to 'Building Back Better and Greener' as linked to the COVID-19 response. The reasoning behind the approach is to ensure that the analysis widely captures valuable information and lessons learnt that can guide the MFA in its future work.

3.4.3 MFA objectives for EU development policy influencing

In 2018, MFA prepared its first EU development policy influencing plan. The description of the objectives was accompanied by a results matrix. Subsequently, MFA formulated updates to the influencing plan in the following years in 2020 and 2021-2022. The influencing priorities of those plans are summarised below.

The MFA 2018 influencing plan on EU development policy covers the period until 2030, when the UN Agenda 2030 ends. The long-term change objectives at the organisation level were defined as follows:

- *The EU and the Member States will implement the 2030 Agenda on Sustainable Development Goals (SDGs) comprehensively and strategically in development policy by combining the three dimensions of sustainable development in a balanced and coherent way, and*
- *The EU and the Member States apply the principle of policy coherence in support of sustainable development and consider the objectives of development cooperation in all their internal and external policies that may affect developing countries.*

More immediately, Finland aimed to exert influence to ensure that at least the past level of EU ODA was maintained in the new EU budget (MFF 2021-27) with an explicit ODA commitment. Finland also planned to support the Commission's proposal for the future MFF to include a commitment to a unified financing for development under the NDICI to enable flexible and cost-efficient channelling of funds for least developed countries. Equally it aimed to push for the NDICI to include a commitment to poverty reduction as the main objective and an earmarked allocation for least developed countries.

Moreover, Finland has consistently promoted increased funding for sexual and reproductive health and rights (SRHR) and intends to continue with this influencing agenda in the future. In addition, a more significant share should be allocated to the fight against climate change. Finland also prioritised the Post-Cotonou EU-ACP relations to align with Finland's negotiating objectives. They highlight the focus on Africa, least developed countries and fragile countries, without limiting it only to ACP countries and with the inclusion of human rights and equality. In terms of influencing objectives on organisational efficiency, Finland's long-term priorities were that the Commission DGs would jointly implement the Agenda 2030 in line with the principle of policy coherence for sustainable development. Last, but not least, Finland also promoted the recruitment of Finns in the EU as well as procurement from Finland.

For the Finnish EU Presidency in 2019 specific priorities were set both at a general level and more specifically for development cooperation as explained in Box 2.



Box 2 Finland's EU Presidency in 2019

Finland held the rotating **Presidency of the Council of the EU** for the second half of 2019. The Presidency enables influencing of the agenda at all levels, from the political to the working group level, in both formal and informal settings, and in Brussels and partner countries, with the EU delegations and the MS embassies. While the holder of the Presidency can introduce their topics or interests to the agenda, they also need to help the European Commission orchestrate the ongoing business of the Council and its working groups in Brussels. The holder also works closely with the 'Presidency Trio', the MS that hold the Presidency both before and after, to set longer-term objectives. In Finland's case, that was Romania (first half 2019) and Croatia (first half 2020). In addition, the Presidency country chairs the development working groups (CODEV, ACP, and 2030 Agenda working groups) while EEAS chairs the geographical groups.

The general influencing priorities during Finland's Presidency of the Council of the EU were defined in the document '**Sustainable Europe-Sustainable Future – Finland's Presidency Programme 1 July – 31 December 2019**' (Finnish Government, 2019b).

A June 2018 Background Paper for Anne-Mari Virolainen, the Minister for Foreign Trade and Development at the time set as key reference frameworks for the Finnish Presidency: the 2030 Agenda, the Paris Climate Agreement and the new European Consensus for Development and identified the following priorities: **Gender equality** (incl. SRHR), **human rights**, as well as the **0.7% ODA/GNI** and **0.2% of ODA/GNI to least developed countries targets**. The paper also noted that **financing issues** would be a central element of the Presidency with the start of discussions on the **next EU MFF**. Also, a decision was required on the **future level of EU ODA** and creating an '**External Action Facility**' (later to become the NDICI-GE). The need to tackle the negotiations for the **post-Cotonou negotiations** was also highlighted, where Finland would want to see priority given to **Africa** in future cooperation and a focus on **least developed countries** and **fragile states**.

More refined priorities were described in MFA internal documents tailored for specific processes and platforms such as the Council Working Party on Development Cooperation (CODEV) or the NDICI-Global Europe financial framework negotiations.

At the close of the Presidency, Prime Minister Sanna Marin stressed, in particular, international development, the progress made on EU support for the implementation of the 2030 Agenda, the EU partnership with Africa, and the EU financial architecture for development. However, a wide variety of other development topics were discussed in CODEV and other relevant Council working groups (Marin, 2019).

The Prime Minister's Office published a brief public report on the Presidency on a dedicated website (Finnish Government, 2019a). The more detailed accounts of negotiations were documented in internal memos at the MFA on various topics.



The Ministry published two updates to its influencing plan a few years later (2020 and 2020-2021). The 2020 plan includes the following items:

- Finland supports the Commission's strong emphasis on Africa.
- The EU's global COVID-19 pandemic response. Support the EU's comprehensive Team Europe approach (see Box 3 below). Still, the recovery should be based on the sustainable and inclusive principle of 'Building Back Better and Greener'. Specifically, the response should pay particular attention to gender equality, SRHR, climate action, and education.

A list of the priority processes and thematic priorities for Finland to follow are included in the Annex 4.

Box 3 Team Europe approach and the Global Gateway strategy

Team Europe (TE) consists of the EU, the EU MS, their implementing agencies and public development banks, the EIB, and EBRD. It was launched as part of the EU's global response to the COVID-19 pandemic in April 2020. The concept was included in the 'working better together' approach, to further improve the coherence and coordination of efforts, especially at the partner country level. The initiatives can also be multi-country or regional as well as global. TE seeks to establish a leading role for the EU on the global stage, protecting and promoting European interests and values, as well as branding EU interventions and creating more visibility. The approach is one of the guiding principles for EU MIPs. It aims to provide a strategic European response through joint programming.

Team Europe Initiatives (TEIs) are the main programmes that use the Team Europe approach adding to the overall implementation of the EU MFF. They aim to deliver results for partner countries in line with their strategic and national priorities. At the same time, TEIs are underpinned by the EU's political and policy priorities. They are financed both from the EU budget and therefore guided by NDICI programming guidelines and from the relevant financial resources of the participating EU MS. The joint programming processes at the country level should reflect and incorporate the TEIs, and vice versa TEIs should feed into the ongoing and future joint programming processes. The initiatives can also be multi-country or regional (an updated list available at <https://europa.eu/capacity4dev/wbt-team-europe>).

Currently, the European Commission aims to include these ongoing economic and social recovery efforts under the umbrella of the **Global Gateway** strategy launched in December 2021. This new geopolitical strategy builds on the EU's potential to stimulate sustainable digital, energy, and transport solutions worldwide (EU, 2021).

For more information, see the thematic brief on EU's external COVID-19 response / Team Europe in Volume 2.



Influencing the EU takes place also at the **country level**, especially, in the locations where Finland has established an embassy. MFA publishes country programmes for development cooperation (earlier called country strategies) in Finland's long-term partner countries. Since 2020, more comprehensive country strategies involving sectors also beyond development cooperation and country programmes have been defined separately.

The partner country setting provides a different context for influencing the EU than the Brussels/EU capitals context. The number of EU players (EUD and MS embassies) is generally smaller, the personal connections between all the heads of mission, heads of cooperation and sector specialists more direct and frequent, and their daily concerns both more operational and more political vis-à-vis a single interlocuter, the partner government.



4 Findings

4.1 Efficiency of organisation for influencing (EQ1)

EQ1 To what extent are the MFA's management approaches, arrangements, processes, and tools efficiently organised to maximise Finland's influence from the point of view of development policy and cooperation?

Summary Answer: The MFA is generally efficiently organised for influencing the EU. The approach and strategies developed for the influencing are coherent with its development policy and generally well understood. However, their efficiency is not as strong as might be, as they are complex, not always well focused, and prioritised, nor always farsighted enough. In terms of resources, some staff are clearly stretched, yet there is no monitoring of staff time on influencing. On the other hand, there are also some good examples of flexibility in staff deployment. Leveraging of EU funds for Finland occurs, but it is not extensive. External observers are positive on the competence and professionalism of MFA staff and organisation. Internal views on roles and responsibilities are more mixed. There are some good instances of informal and ad-hoc reporting, but institutionalised MEL systems are almost non-existent.

4.1.1 Approach and strategy

Criterion: The approach and strategy developed by the Ministry to influence the EU, starting from its influencing plans, was efficient, coherent with wider MFA policies and well understood by all actors, including for the embassies and for the wider Finnish government bodies involved and the Parliament

Finding 1.1: While the MFA's EU influencing strategies are generally coherent and well linked to Finland's development policy and EU agenda, they suffer from some lack of clarity on prioritisation, inadequate internal consultation and limited forward planning. Poor information sharing between different parts of the Ministry is also apparent at times.

Officials interviewed regularly emphasised the systematic links between Finland's overall agenda for the EU with its development policy. Responses to the survey (see Volume 2) were generally very positive on the efficiency and coherence of the MFA's influencing strategy. The overall European and international context in which influencing occurs is also seen as part of the framework and this was apparent in interviews from the regular references made to the government programme, its overall EU policy, foreign and security policy, migration, trade and to the Ministry's vision of international affairs beyond the EU. Several EU officials in both delegations and headquarters also commented positively on the synergies between EU and Finnish development policy, which suggests that Finland's influencing is well-tuned to the EU context in which it operates.



However, there are mixed views on the clarity and prioritisation of the EU influencing plans on development policy (2018; 2020; 2021-2022) with quite a number of interviewees making critical comments, though overall the balance remains positive. Two thirds of Finnish respondents to the survey, for instance, were positive about the Ministry's EU influencing strategies and their efficiency and coherence (see Volume 2). The evolution of MFA's EU influencing plans reflects the comments by interviewees; for example, the complexity and number of priorities show an increasing trend between the 2019, 2020-2021, and 2022 MFA EU influencing plans.

Officials in EU related departments, responsible for the influencing policy are well able to explain its rationale and coherence. Nevertheless, a good number of MFA interviewees argued that priorities were not always clear for Finland's EU influencing, that the policy had different levels making it at times unclear which were the most important objectives and that more guidance on how to prioritise among them in specific contexts would be useful. Equally there were comments about a need to improve the long-term vision behind the influencing strategy and to start influencing at an earlier stage. It was felt that there is more scope for taking into account the EU dimension in the overall strategic planning of the Ministry which in turn would help with the targeting of influencing. For geographical desks and embassies, for instance, country strategy and programme formulation guidelines mention EU influencing only briefly and reporting guidelines do not mention the EU at all. Equally, it would seem that the importance of the EU as a vital tool for achieving Finland's foreign service strategic priorities is not always stressed. For instance, the MFA diagram reproduced in Figure 3 above (MFA, 2018f), suggests the EU is merely part of the context in which the MFA operates, but not part of the tools or approaches adopted to achieve the MFA's priorities, nor indeed, potentially, a strategic priority in itself.

Some critical comments were made about internal Ministry coordination on influencing with different departments not always fully aware of each other's priorities on the EU. Not surprisingly perhaps, this was particularly evident when new EU initiatives emerged, such as Team Europe or the Global Gateway, where it was important the MFA took a collective view quickly. There is also a lack of guidance on country-level EU influencing.

While the government's high-level policy on the EU is in the public domain (e.g., Government Report on EU Policy 2021: Strong and united EU – towards a more sustainable European Union; Sustainable Europe - Sustainable Future, Finland's Presidency Programme (2019)), and is known and generally supported by most parties in parliament, the influencing plans on development cooperation however are not in the public domain. They have also not been discussed with external instances such as the Development Policy Committee (KPT). Moreover, there appears to have been limited internal consultation beyond the departments directly responsible for the EU. Embassies, for instance, have not been consulted though this does seem to be changing with Team Europe (e.g., MFA internal brainstorming with embassies on Team Europe on 16 June 2020) where their involvement is often highly relevant.

The importance of this finding is also underlined by Small State Theory which encourages such states to ensure that their policies are coherent and based on broad political consensus (SST-H7). It would seem that the design of Finland's influencing strategies are in line with this hypothesis, but more could be done to ensure they are clear to and well supported by all stakeholders.



4.1.2 Resources: Staffing and budgets

Criterion: The staffing levels and budgets deployed by the MFA at various levels of engagement for influencing the EU have optimised the use of the resources available

Finding 1.2.1: MFA staffing is tight. Interview evidence suggests limited staff time is a constraint on EU influencing work both in Brussels and in the embassies, resulting in missed opportunities and obliging staff to prioritise as carefully as possible. There are also too few Finnish nationals in the EU civil service and notably in DG INTPA.

Finding 1.2.2: Limited Finnish ODA budgets do not seem to be a constraint on influencing, but Finland could do better at gaining access to EU funding. The MFA has undergone the EU pillar assessment enabling it to manage delegated cooperation funds, though it is the only Finnish entity to have done so, which is a constraint on expansion.

The MFA operates in a context of tight staffing budget levels. Echoes of this emerged from various interviews: in the Ministry itself, in embassies and in then secondment of Finnish officials to EU institutions. This also seems to affect training and capacity development, which several interviewees felt could be improved. Embassy survey respondents were mixed in their views on budget and staffing levels. On staffing more specifically, turnover and constraints in terms of human resources, particularly at partner country level, were felt to affect the level and quality of engagement as well as the ability to devote time to influencing tasks.

No evidence is available on MFA staff time spent on EU influencing. As EU work permeates a lot of the work of the Ministry it is also difficult to separate out from officials' other work. In the Perm Rep in Brussels there is one staff member working on the principal Council working group for development cooperation (CODEV-PI), but she also covers Human Rights (COHOM). All Member States covered in the peer review indicated they had limited staff time available for EU influencing but did not specify numbers. Some of them also highlighted that staff turnover and constraints in terms of human and financial resources, particularly at partner country level, affect the level and quality of engagement as well as the ability to devote time to influencing tasks.

At the same time, Finnish staff numbers in the EU institutions remain below par for what would be Finland's notional share based on its population. As explained in Box 5 in Section 4.2.2 below, this is partly due to low levels of Finns applying to the EU personnel selection processes. However, it may also be because EU careers have lost their appeal to young Finns. Finnish secondments to the EU in the development sector are notably absent. Sweden on the other hand (as per peer review) is increasing its numbers and plans to have 20 seconded experts in the development sector in the EU. Small State Theory also underlines the importance of secondments with external stakeholders as a capacity building strategy (SST-H2).

The National Audit Office investigated this issue in 2016, highlighting the low rates of recruitment to the EU. The MFA responded indicating it was taking measures to address the issue, particularly with respect to the placement of Finns in the EEAS, but the situation remains sub-optimal.

The lack of enough diplomats and sector experts in embassies also came up as a constraining factor for EU influencing in both the Nepal and Tanzania case studies. Some opportunities for more



extensive influencing were missed. Embassy communication on the positive results achieved in Finnish projects could have been stronger thereby also helping to influence the EU. However, EUD staff did comment favourably on the expertise and professionalism of Finnish officials and experts: *“Finnish staffing is limited in quantity but good in quality”*. Equally survey respondents, both from Finnish embassies and EUDs, did not see staff shortages as a major obstacle to Finnish influence, though some concerns were voiced about limited numbers of specialised staff and the increased pressures managing EU delegated cooperation funds placed on staff time.

Various examples emerged of the MFA appointing extra diplomatic staff or experts at strategic moments that were relevant for EU influencing efforts, such as additional staff for the EU Presidency or a new Commercial Counsellor position – both in the Perm Rep in Brussels – tasked with facilitating Finnish private sector engagement in EU operations globally (see also the brief on COVID-19 response in Volume 2).

The creation of this Commercial Counsellor position in Brussels speaks to the fact that many MFA interviewees feel Finland was still quite poor at leveraging EU funds for Finnish interests and feel this is a major challenge for the country. This is partly related to Finland’s limited ODA funds, though in itself this does not seem to be a serious constraint on EU influencing. Steps have been taken to leverage EU funds and the MFA has undergone the pillar assessment for the MFA to ensure it meets the criteria to manage EU funds in a delegated cooperation mode. This has been successfully done with the RVWRMP project in Nepal. Other actors such as Finnvera, Tesi and the Nordic investment bank (NIB) are also being pillar assessed so that they can partner with the European Commission. Finnfund has been pillar assessed to participate in providing guarantees in the EFSD+ and the other three expect to participate in the implementation of the InvestEU programme. However, Finnfund has not done the pillar investment required to manage grants, leaving the MFA itself as the only Finnish entity able to take on EU delegation cooperation funding. This may prove a constraint if the Ministry wishes to expand its access to this type of funding.

4.1.3 Organisation: Roles and responsibilities

Criterion: The roles and responsibilities of the Ministry’s various units and actors (including the embassies) involved in influencing the EU and the systems for linking them were efficient, clearly established and well understood

Finding 1.3: External observers are generally positive on the way the MFA is organised and the autonomy given to staff in Brussels and embassies. Internally the relatively flat organisational structure, limited hierarchy, good autonomy and backup for representatives are seen as positive. Yet there are also mixed views on the setting of roles and responsibilities, on the strength of leadership, on levels of EU knowledge and some lack of clarity on coordination of EU topics.

Views expressed in interviews in Helsinki were mixed. Some were positive or neutral about MFA internal roles and responsibilities suggesting that the MFA was good at setting general priorities, that its internal coordination has improved over time, and that it was particularly good during the EU Presidency and the NDICI negotiations. The limited hierarchy and flat structure¹³ were also

13 A flat organisation structure has few levels of hierarchy between senior management and frontline staff (see <https://www.nibusinessinfo.co.uk/content/flat-organisational-structure>)



appreciated. Others had clear opinions on how the leadership in the MFA needed to be strengthened, that there was not enough coherence between departments, and no suitable platform to discuss EU affairs regularly and coordinate actions. Yet others saw room for improvement in how units and departments are organised in terms of EU influencing, arguing that there was a general lack of clarity on who does what. Another view was that the organisation of UN influencing seems much clearer. One interviewee was specifically concerned about growing incoherence between trade and development policy.

The view from interviewees outside the MFA was consistently positive with counterparts from the EU and other MS saying they felt the Finnish MFA was well organised and efficient.

MFA officials in Brussels generally commented positively on the guidance received from Helsinki both in terms of content and timing. In particular, they appreciated the space and autonomy the MFA gave them to interpret their briefings and instructions in a proactive manner according to circumstances. It was felt by both Finnish officials and others that this was an important factor in the successful execution of the EU Presidency (see also the Presidency brief in Volume 2).

Several HQ officials (both MFA and EU) emphasised the importance of country-level influencing. Case study interviews, both with embassy and EUD officials, confirmed this, citing examples of discussions on the latest MIPs, TEIs and GAP III country-level implementation plans for instance, where considerable influencing took place. Discussions at the country level tend to be more concrete and 'real' compared to policy debates in Brussels. The role of regional departments is also felt to be key in influencing the EU delegations. Some interviewees suggested that more money and expertise should be invested at the country level and that MFA staff at headquarters in embassies and in Brussels need to collaborate closely on the use of the new NDICI instrument. Evidence from the Nepal and Tanzania case studies was already quite positive about internal coordination with the MFA in Helsinki. Embassy officials responding to the survey highlighted that the EU's new TEIs introduce a need for a major change in internal coordination.

The peer review also brought out how some MS used more decentralised approaches to decision making which allow for greater flexibility in adapting to country contexts. However, these can also be challenging models to operate and lead to less coherence. In Denmark, for instance, a decentralised approach makes it easier for embassy staff to connect their development cooperation with advocacy work. Whereas in Portugal, Portuguese Cooperation Centres are administratively independent entities overseen by the relevant embassy. They have been able to hire staff locally and increase their capacity to support and provide advice.



4.1.4 Organisation: Working jointly with others

Criterion: Opportunities for joint working within the Ministry (including the embassies), and with the wider Finnish government and Parliament have been maximised

Finding 1.4.1: Finland's coordination on EU matters generally works well both within the MFA and across government, but there are also various improvements that could be made to strengthen organisational efficiency for influencing the EU on development cooperation. The most pressing example of this, due to its likely importance going forward, is the lack of clarity on internal coordination on Finland's approach to the TEIs and the EU's new Global Gateway strategy.

Finding 1.4.2: External coordination and consultation with stakeholders such as the KPT and the Parliament is also not as strong as it could be. This undermines transparency and accountability and deprives the MFA of a potentially useful source of complementary support on influencing EU development policy and cooperation given that such stakeholders also have their own channels for influencing in Brussels.

Coordination on EU matters in Finland is generally seen as positive in literature and by interviewees both within and outside the Ministry, and there are many examples of where this operates smoothly both within the Ministry and externally between the MFA and other parts of government. However, examples also came to light where improvements could be made on joint working that are likely to have a positive impact on EU influencing (e.g., with Urpilainen Cabinet, with KPT, and with the private sector in particular for TEIs and the EU's Global Gateway).

Finland's overall system for the coordination of EU affairs has been positively reviewed in the literature (Nordström et al., 2022). However, much of the discussion in this literature relates to Finnish influence on EU legislation and vice versa. As development cooperation is an area of shared competence in the EU – which relies largely on consensus building rather than legislation – practices in this area can be somewhat different though the overall positive image remains valid.

To their counterparts in other MS, Finnish delegates give the impression of being backed up by a well-coordinated Ministry which gives them appropriate and timely briefings coupled with sufficient flexibility. Though it should also be said that many of the countries consulted in the peer review also have a specific ministry unit working on EU affairs. Perm Rep staff in Brussels are also positive about the coordination with Helsinki, and staff in Helsinki responsible for feeding information and positions to Finnish delegates to EU committees also feel the system works well. Finland's EU Presidency was a moment that showcased the country's ability to run a tight ship which many Brussels interviewees commented on favourably. In particular, the wide coverage of the new single instrument, the NDICI, required good coordination on various topics across the MFA (development cooperation and neighbourhood, but also Arctic and cross-border cooperation with Russia) for the negotiation. The Finnish line on the NDICI was also successfully communicated and discussed with the Finnish Parliament (NDICI outcome).

There is also evidence that the MFA coordinates well with other ministries over EU influencing, the Finnish chair of the EU Working Party on Forestry during the EU Presidency came from the Ministry of Agriculture & Forestry for instance, although this concerned EU internal policy rather than development cooperation. Another example is Finland's prominent role in global climate negotiations



and diplomacy, where EU-level coordination is a given. In those processes, MFA liaises closely with the Ministry of Environment of Finland. There is also evidence of good coordination with the Ministry of Education on programmes in this sector (e.g., in Ukraine, Tanzania). Equally on COVAX the MFA was in close coordination with the Ministry of Social Affairs and Health and the team did not observe any complaints in this respect.

The presence of a Finnish commissioner for DG INTPA presented another, out of the ordinary, opportunity for external coordination for the MFA. This seems to operate smoothly at various levels (Minister Skinnari is in regular contact with Commissioner Urpilainen and the Perm Rep with members of her Cabinet), but interviewees suggested that more advantage could be taken of this situation. In particular, there is some evidence that suggests the Ministry was quite slow to initiate these contacts, thereby missing opportunities to have an early influence on her programme.

On the other hand, there are also clear examples of where joint working, coordination and transparency can be improved. Communication in both directions, between the embassies and headquarters is not always as strong as desired (e.g., on priorities for EU influencing, or on opportunities for Finnish companies to participate in emerging projects in country or TEIs).

Equally, there is demand from the KPT to be more involved in forward looking debates before choices are made internally in the MFA. Similarly, MFA's Action Plan for Climate Smart Foreign Policy (2019) remained an internal document. On the private sector side there are also indications that internal coordination and external joint working could be improved and the need for this is becoming more urgent if Finland is going to take full advantage of the introduction of the new TEIs and the EU's forthcoming Global Gateway.

As indicated above, Small State Theory also encourages ensuring broad based political consensus (SST-H7) around EU influencing strategies.

4.1.5 Organisation: Learning and monitoring

Criterion: Learning, feedback and monitoring mechanism on influencing have been established and are used

Finding 1.5.1: There is no systematic approach to monitoring and learning lessons on EU influencing, which relies heavily on the continuing presence of experienced individuals. Yet, there are good practices at the level of individual units and teams that do organise to pass on essential knowledge to colleagues, but this is largely done on an ad-hoc basis.

Finding 1.5.2: There is an apparent lack of institutional forward thinking and visioning based on lessons learnt and new evidence.

There is little or no system for learning feedback on EU influencing. To a large extent this relies on individual experience particularly among sector experts that spend longer in post than the diplomats in the Ministry who are rotated regularly. This inevitably causes difficulties with handovers.

At a wider level, interviews and the documentation reviewed suggest that in general institutional knowledge sharing is not very systematised in the Ministry. There are some good practices such as regular team meetings, periodic workshops for EU training and a fair amount of regular, though



often also ad-hoc, reporting from units and embassies. MFA's annual (development cooperation) Results Day, Annual Development Policy Days, and Annual Ambassador Days are also useful established practices. However, there is not much in terms of systematic monitoring, though independent evaluation, such as the current exercise, is carried out regularly. But there is also a feeling that reporting obligations are already too heavy and that there are too few opportunities to exchange views across the Ministry in a more dynamic and engaging manner that attracts attention.

There is also an open question on synchronising lesson learning with the timelines of EU debates that create opportunities for influencing at particular moments: knowledge sharing needs to follow the pace of external events.

There is quite extensive reporting that has grown up over the years, but this has apparently not been brought together in an organised system of knowledge management. The lack of institutionalised learning mechanisms means that when reporting does take place is not always systematically fed into knowledge management systems where it could be retrieved and drawn on when needed. Thus, there are many memos recording different events and processes (e.g., memos of different aspects of the Presidency), most of these purely internal and often quite ad hoc 'reporting'. Equally, there is a weak bottom-up mechanism to feed learning from the embassies to HQ (confirmed by case studies and the survey).

The question of learning is a systemic issue and is linked with leadership, priority setting and with staff placements. The Audit Office's recommendations (see section 4.1.2) thus remain valid. Equally, this runs counter to Small State Theory which encourages consistent use of capacity building strategies (SST-H1).

The peer review also brought out the importance of training and experience. Thus, some countries (Denmark) pointed out that a certain level of technical expertise is required to work on influencing the EU, which is often difficult to attain. Yet none of the peer countries reviewed reported providing their staff with specific training on influencing issues, but rather such guidance tended to be provided on an ad hoc basis (e.g., Ireland contracted the services of ECDPM to provide training on various topics).

Forward thinking based on acquired knowledge and experience is also very limited and needs to be substantially strengthened in the eyes of a number of interviewees.



4.2 Relevance, efficiency and coherence of influencing processes (EQ2)

EQ2: To what extent has the MFA succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU in a relevant, coherent and efficient manner?

Summary Answer: Finland's processes for influencing the EU on development cooperation are relevant, coherent, reasonably efficient and run smoothly. Finland's policy for influencing the EU is generally well translated into practice. Finland makes good use of the opportunities and mechanisms commonly used for this advocacy work. In particular, it works extensively and effectively with like-minded groups and coalitions among the MS, both building them up and maintaining them as required. Though the relative lack of Finns in the European Institutions is a handicap for influencing. The MFA also works closely with the European Commission where it is seen as a constructive MS. Finland is well perceived by EU and MS officials who see Finnish officials as well organised and prepared, professional, honest and approachable, though perhaps also somewhat cautious at times. Finland's EU Presidency was also seen as well run and effective. Partly as a result of this positive image Finland's positions on policy issues are generally well known and understood and its inputs are seen as coherent and relevant. The impact of this can also be seen both at the level of EU development policy and at a more operational level in terms of programmes and projects, including decisions on EU finance that are in line with Finnish interests.

4.2.1 Activities: Working with coalitions

Criterion: The Ministry has engaged at various levels and used different channels in a relevant, coherent, and efficient manner to build coalitions, within the EU and with other EU MS on various priority areas

Finding 2.1.1: Coalition building and working with like-minded groups is extensively used by Finland both with well-established like-minded groups of MS and more informally and casually. The practice is also reflected at the level of embassies. Finland is seen by officials from other MS and the EU institutions as adept at coalition building.

Finding 2.1.2: On a sector specific level Finland has used working with like-minded state coalitions though not always in a consistent fashion. Thus, for instance, it has invested heavily on EU MS coalitions on gender equality but not on disability inclusion. This may partially explain the very different levels of visibility Finland enjoys in EU development circles on these two topics.

Evidence of Finland's active use of coalition building was picked up throughout the research: in interviews, in documentary evidence, in Brussels, in Helsinki, among MS, in the EU institutions, in EUDs and in embassies. Multiple interviews with different types of interviewees confirmed most of the points. All the peer review countries referred to coalition building and indeed saw it as standard



practice. This is also consistent with the literature on Small State Theory as discussed above and in the annexes (SST-H6).

Officials from EU institutions also confirmed that Finland is adept at working with coalitions. The process of EU decision making in development cooperation with most common positions being reached by consensus in Council working groups lends itself to the formation of coalitions and indeed the practice is seen by officials in Brussels circles as standard practice. Finland is also seen by officials from other MS and the EU institutions as adept at the process of coalition building and is recognised as very active in this behind the scenes setting up coalitions and nurturing those that are important to it, so much so that one MS official remarked that in official settings they had noticed that: *“Finland never stands alone”*.

MFA Helsinki staff, including management, are clear on the importance of coalition building. Traditionally Finland has worked with the other Nordic countries and is still doing so, but the practice goes well beyond this obvious first group and now more, and often more transient, coalitions are built around different themes and at multiple levels in a very dynamic way. Having one or other large MS in the coalition can be useful but is often not essential. Working in coalitions typically involves not just agreeing on positions but also strategizing how best to push positions both in and out of formal meetings.

Typically, therefore, Finland works with the Nordics, Netherlands, Germany and Ireland. The UK was also a regular partner before Brexit. However, other participants such as Poland, France and Belgium were also mentioned in different cases and indeed confirmed by officials from these countries.

Coalition building is also seen as key by sector advisers, but if they work on their own in the MFA there can be difficulties in maintaining the rhythm required to sustain coalitions and maintain networks, particularly if Finland wants to play a leading role. Personal contacts are crucial in these networks and coalitions, which means they can be vulnerable to poor handovers and staff turnover, particularly where sector advisers work on their own. In Brussels sustainability appears to be less of a problem because CODEV and other working groups have regular meetings creating opportunities for informal networking in the corridors or after meetings. The importance of this became evident during the COVID-19 pandemic when much of this informal networking was curtailed making the whole process of building and sustaining coalitions more difficult. In embassies coalitions are perhaps even easier to establish and sustain, particularly if the EU group present in country is small (e.g., Nepal), because embassy staff know each other and meet frequently in both formal and informal settings.

A strong example of sustained working with coalitions is provided by the gender equality case where Finland has long worked with a group of like-minded states. These are active in the EU level Gender Experts Group, but also in CODEV and other Council groups including the ad-hoc group for the NDICI negotiations. The like-minded group for gender equality has a more or less constant core membership, but also includes less regular MS participants from time to time. In late 2021 Finland also proposed a supplementary sub-group to the Gender Experts Group be formed to study how the concept of a ‘gender transformative approach’ (one of Finland’s core approaches) could be made more operational in the EU context. This sub-group attracted about 9 MS and started work in early 2022. The value of having this sub-group was confirmed by the Commission staff as well as MFA officials.



On rights of persons with disabilities on the other hand, the MFA does not appear to be active in any EU level coalition preferring instead to work with like-minded states in UN and global contexts.

Coalitions with like-minded states have remained an essential part of EU influencing mechanisms, both when working with the Commission and during Council discussions. Examples in Box 4 below show how building coalitions has been used not just to push for Finland's priorities and/or convince the EU, but also, to 'block' compromise decisions being made. The examples also show that the need for coalition building varies from topic to topic.

Box 4 The value of coalitions with like-minded states

Finland has taken an active role in seeking coalition with other like-minded states, as demonstrated in specific areas, notably gender equality. This has led to a good level of success, as shown on the issue of gender equality and SRHR in the 2017 'European Consensus for Development', when 17 MS lobbied for stronger language in the 2017 Consensus during Malta's Presidency.¹⁴ Other forms of coalition work include sending joint letters to the EU Commission.¹⁵

In some cases, Finland has been able to 'piggy-back' on other like-minded states' influencing positions to achieve its objectives. In practice, however, this 'silent' approach to influencing still requires quite some preparation and liaising with other MS, so as to ensure that they share Finland's positions and are prepared to take the lead. More concretely, it is current practice for like-minded states to meet in advance of key meetings not only to agree to a common position but also decide on who will take the lead on what during the meetings.

Informally, one MFA respondent also shared the example of climate mainstreaming in NDICI, which Finland assumed Germany would push for (including during its Presidency). Due to a mistake this did not happen, however, which in part explained the limited achievement in this area (see section 4.3). While this example remains anecdotal, it clearly indicates **the importance of knowing both other MS' respective positions and their influencing plans going forward.**

Coalitions have also been used to block decisions. As already made apparent, the majority of MS share the same development cooperation objectives related to gender equality – with 24 (out of 27) delegations supporting GAP III text in its entirety – yet a minority of MS are strongly opposed to SRHR and gender identity. During GAP III Council discussion, influencing tactics (such as those listed in Box 9) proved insufficient to achieve the required unanimous vote. So, in this particular case, a coalition (between Finland other like-minded states) was in effect used to **block a decision** that would compromise their positions. Finland with another 11 MS insisted that the term gender equality should not be removed or changed to another format.

14 MFA interview

15 Evidence collected include the following illustrative examples in relation to gender equality: In 2017, Finland was the co-signatory of a joint like-minded states letter to EU Development Commissioner asking the Commission to allocate additional funding to cover the SRHR funding gap after the US cuts. In 2018, Finland coordinated the drafting of a joint paper by like-minded states on how to include gender equality in the NDICI. According to an MFA official, Finland with other like-minded states also pushed the EC to send internal instructions to their EUDs on how to integrate GAP in programming.



The MFA recognises the importance of combining EU cooperation and bilateral channels when influencing the EU (MFA, 2022c). There is no evidence, however, to show that Finland has worked bilaterally to cooperate with non-like-minded MS even though, in preparation for the Finnish Presidency, one recommendation coming from the EC was that MS should engage directly with the capitals of ‘difficult’ MS to discuss their position on gender equality. Yet in practice, it appears that Finland has **mostly focused on working with established like-minded states** (such as Sweden, Denmark, Netherlands, Ireland, Germany, France, Spain and Portugal (MFA, 2021a)) rather than on seeking new ones. This approach seems largely justified, in view of the efforts (and low chance of success) required to win over some MS and get them to change their positions on politically sensitive subjects.

An example from the NDICI negotiations shows that, **in some (rare) cases, building a coalition is not strictly necessary**. With NDICI, Finland MFA had been actively pushing for the inclusion of the Arctic in the regulations. However, for this topic, a coalition with others was not particularly needed, because all MS and EU Institutions, at least tacitly, accepted Finland’s position. During the interviews, external stakeholders referred to the Arctic as a ‘niche’ area that Finland had unilaterally (and successfully) pushed for throughout the NDICI negotiations (including during the Finnish Presidency).

Finally, evidence shows that **coalitions can help influence the EU institutions as ‘combined voices cannot be ignored’** even though they may not be sufficient to achieve a unanimous vote, as often required for the Council conclusions (e.g., GAP, NDICI negotiating mandate). In this case, a two-pronged approach is needed, with, on the one hand, MS uniting to push for shared priorities; and, on the other, the Council Presidency ensuring that all MS are on board. This gives the Council Presidency an important role as a ‘honest broker’.

Source: Evaluation team, based on interviews and documentary evidence

4.2.2 Activities: Making use of various complementary channels

Criterion: The Ministry has engaged at various levels and using a variety of different channels (including staff secondments) in a relevant, coherent and efficient manner to participate proactively and purposefully in EU governance structures in relation to its various priority areas

Finding 2.2.1: By and large, MFA has demonstrated an ability to combine different influencing channels in a relevant, coherent and efficient manner. Finnish representatives regularly participate in EU governance structures in Brussels or at country level for decision-making, coordination, programme steering or other initiatives.

Finding 2.2.2: There are various Finnish nationals in useful positions in the EU institutions, either independently as EU officials or as MFA secondees, and examples of the MFA being proactive in the appointment of Finnish experts for specific tasks. However, overall, there are still too few Finnish nationals working in the EU institutions.



There are several aspects to this criterion on MFA engagement in the EU: (i) involvement in governance (ii) Finnish staff involvement in the EU (including secondments to EU institutions and the distribution of Finnish fonctionnaires) and (iii) the manner in which this is done (i.e., was it relevant, coherent and efficient). The MFA has engaged in all of these as the descriptions below show.

(i) Involvement in governance: The most high-profile moment during the evaluation period for Finnish involvement in EU governance was during Finland's Presidency of the EU Council for the second semester of 2019. This is covered in more detail under the next JC and elsewhere in this report (brief on Presidency, outcomes, etc.). Suffice it to say here that Finland took this opportunity seriously, prepared for it in quite some depth, identified clear priorities (both in terms of the needs of the EU agenda and in terms of its own priorities) and achieved a respectable number of results in a relevant, coherent and efficient manner.

Finland's **Presidency of the Council of the EU** was an important moment during the evaluation period when the MFA officials could showcase their organisational skills. The way this was conducted indeed won widespread praise. Finland also regularly participates in other governance structures in EU settings be it working groups in Brussels or other EU coordination groups in Europe and in partner countries.

There are however also other moments when Finland has been willing to step into less demanding governance roles that involve the EU. Examples range from leading on operational sector coordination at the level of embassies (e.g. on education in Nepal, chairing donor groups on gender equality and human rights in Tanzania), taking the lead on facilitating an expert group (e.g. gender transformative approach sub-group in the EU), an official from the Ministry of Agriculture and Forestry (based at the Perm Rep) chairing the Council Working Party for Forestry¹⁶ during the Finnish EU Presidency and an MFA official leading the Connectivity group in the D4D TEI. Moreover, this involvement is recognised and appreciated by others with for instance most of the EUD respondents to the survey confirming that Finns regularly took roles in the management of joint programmes or other coordination mechanisms.

(ii) Finnish staff involvement in the EU: In terms of staff deployments there are various cases of the MFA or embassies deploying Finnish staff in useful positions. First and foremost, however, there are a few Finnish career officials or fonctionnaires working in valuable roles in the Commission (e.g., in DG INTPA one of the Directors, an advisor on disability and an official in the Inter-Institutional Relations Unit,) or the EEAS (e.g., the chair of the Africa working group) who stand out as major assets for Finnish interests. But it is also apparent from Commission human resources statistics (see Box 5 below) that Finnish nationals are under-represented in DG INTPA and for the past few years too few Finns have been applying to become Commission fonctionnaires compared to nationals of other MS.

16 <https://www.consilium.europa.eu/en/council-eu/preparatory-bodies/working-party-forestry/>



Box 5 Low Finnish staff levels in the Commission

Finnish staff levels in the Commission have, since 2016, been at 1.7%, that is slightly below the Commission's 'Guiding Rate' of 1.8% for Finland (to ensure a fair balance between MS). For DG INTPA, the proportion of Finns is a lot lower (0.7%). However, although this is low, a rate slightly below the Guiding Rate would not be surprising as about 16% of Finns in the Commission work for the translation services (DGT), so rates in other DGs will be lower. To reach the Guiding Rate the number of Finns in DG INTPA (18 in late 2021) would have to approximately double, to around 30 (taking into account the need for DGT translators).

Data from the European Personnel Selection Office (EPSO) recruitment competitions suggest that not enough Finns apply to (1.5% instead of the 1.8% Guiding Rate), although their success rate is fine (a little above the EU27 average), though not as high as for some MS.

Sources: EC (2018, 2020, 2021)

Although Finland uses secondments less frequently than some MS¹⁷, several examples emerged during interviews such as education advisers for Ethiopia and Ukraine and a secondment of a social sector specialist to the SGUA¹⁸ in Brussels. A Finnish Junior Professional placed in the EUD Nepal also played a useful role at an early stage in getting the EUD interested in the Finnish RVWRMP project that the EUD later helped finance. All these examples relate directly to particular thematic and policy priorities of Finland, and the manner in which these deployments were organised was commented on favourably by interviewees. There was also an example in the other direction of one Finnish Commission official being seconded to the Brussels Perm Rep for the Presidency – so the MFA is using EU knowledge where it does exist in the Finnish community. Several MFA officials interviewed recognise that the Ministry needs to step up its efforts to place Finnish staff in EU institutions, not least to improve the pool of Finnish knowledge of EU institutional processes. At the same time a view was expressed that Finns are in general not attracted to a career in the Brussels bureaucracy, though clearly opinions vary. There has been some exchange on EU appointments between the National Audit Office and the MFA in 2019. The MFA in its response to the NAO report (VTV, 2016a) stressed the importance it attaches to appointments to the EU and that it regularly organises training sessions on EU affairs for its officials.

Finally, the MFA has itself deployed staff to new positions in embassies to tackle specific emerging issues of importance to Finland. Thus, additional staff were posted to the Brussels Perm Rep for the Presidency (e.g., an ambassador level person to add weight to the Finnish chairing of the NDICI negotiations); and more recently a post was created there to act as a focal point to encourage Finnish private sector involvement in EU projects, by collecting advance information on emerging contracting and procurement opportunities that might be relevant for Finnish companies.

The most prominent example of a Finn taking a leading EU governance role is of course Commissioner Urpilainen herself in charge of DG INTPA since late 2019. This has raised the profile of Finland in the development sector and even though her position as a Commissioner means she has to put European, not Finnish, interests first, it still does give Finland direct access to the top of

17 The peer review revealed that Sweden has some 20 secondments in the EU institutions. These are placed in strategic positions such as on gender equality, the Eastern Partnership, democracy and rule of law. There are also plans to increase this number further.

18 SGUA (Support Group for Ukraine) was established as an advisory body in the European Commission in 2014. It helps mobilise EU Member States' expertise and enhance strategic upstream coordination with other donors and the IFIs. SGUA is made up of thematic teams corresponding to the essential reform priorities set out in the Association Agreement.



the DG. At the political level Finland has used this opening regularly and MFA officials have also been in regular touch with her and her Cabinet, though perhaps not as much as some interviewees were expecting particularly at the start, when Urpilainen's appointment was first announced.

(iii) The manner in which this is done: As well as other channels discussed (building coalitions, engaging in EU governance and Finns working in the EU) Finland also cooperates well directly with the European Commission discussing ideas for policy improvements and even contributing language for papers. There it is seen as a constructive MS that plays by the rules, has its red lines, but is also willing to be pragmatic, seek consensus and compromise. For the Presidency, for instance, Finland worked closely with the Commission to prepare key debates and actively sought to ensure it had Commission support for its priorities.

Documentary evidence and interviews also show that Finnish officials engaged regularly and proactively in a wide variety of ways with EU institutions and MS officials both informally and formally, at all levels and both one to one and in group contexts. Again, using the Presidency as an example, specific efforts were made to build trust with different parties well in advance, explain Finnish thinking in one-to-one settings at political as well as official levels, encourage debate by organising events and float ideas through draft papers and presentations. All this in an effort to bolster the regular formal channels of working groups preparing Council meetings. The same open and engaged approach, though obviously with less intensity than for the Presidency, is evident across the board, both in Europe and in partner countries, in the way Finnish officials work with their EU and MS counterparts on an on-going basis, and is indeed extensively confirmed by their interlocuters.

The COVID-19 pandemic obviously changed regular working practices a lot, but in both positive and negative ways. On the positive side interviewees mentioned new internal MFA coordination meetings via videoconferencing, including some open to all staff, and an increase in informal exchange on digital platforms with EU and MS actors. Drawbacks included challenges from not having physical meetings, higher than normal workload in EUDs as they also did their best to cope with the health emergency, good momentum on certain topics becoming disrupted and no real brainstorming with colleagues.

It is the combination of these different more formal channels (building coalitions, engaging in EU governance and Finns working in the EU, working directly with the Commission) and the manner in which they are used by officials, combined with the personal contacts they establish, that result in a relevant, coherent and effective package. In addition, there is a question of timing and using opportunities as they arise which we explore in the next section.

4.2.3 Activities: Taking advantage of opportunities in the EU calendar

Criterion: The Ministry has engaged at various levels and used different channels in a relevant, coherent and efficient manner to take advantage of the specific and relevant EU policy debates and opportunities that have arisen, including Finland's EU Presidency

Finding 2.3: Finland has a solid track record of using the opportunities in the calendar of EU debates to advance its policy priorities in different ways that are well adjusted to the circumstances and scope of the topic. In particular, the opportunity of its EU Presidency in 2019 was taken very seriously with a well thought through and implemented approach that met with widespread appreciation among interviewees.



Overall, we can conclude that Finland has a good track record of using opportunities in the EU calendar and the debates they result in, to push its development policy priorities. Exactly how this is done varies according to the topic, the circumstances and indeed the role Finland is playing. Thus, during the six months of the Presidency when Finland played the role of a facilitator it had to downplay its advocacy stance, but on the other hand it was in a strong position to craft the agenda and set the terms of the debate which also allows scope for advancing its own priorities in different ways. Equally, we can see that the role Finland was able to play in the MIP programming in Nepal and Tanzania was adjusted to the different circumstances of the EU group of donors present in country. Yet, we should also note that as discussed below (sections 4.3 and 4.4) some opportunities do not materialise as expected (e.g., slow progress on post-Cotonou reducing the scope to discuss EU relations with Africa) or even get missed (e.g., climate language in NDICI regulation).

Interviews and documentary research show a strong level of Finnish engagement in EU debates and opportunities occurring during the period of the evaluation including in particular most of those identified as opportunities in Figure 1 above. The key moment was once again Finland's EU Presidency where there is considerable documentary and interview evidence of how Finland engaged, but there were other EU debates as well that came up in the interviews, notably the drafting of the 2017 European Consensus on Development, the NDICI, joint programming for MIPs and the discussion on TEIs arising out of the COVID-19 pandemic. Yet Finland also has a reputation for restraint and only contributing to discussions when it has something to say, which is seen by other stakeholders as a positive attribute that adds weight to its contributions.

Less present in interviewees' minds was the discussion on policy coherence around the PCD evaluation and Council conclusions in May 2019 just before the Finnish Presidency and the post-Cotonou negotiations which were largely in the hands of the Commission. The lack of prominence of the EU debate on PCD is probably because the debate itself is no longer as intensive as in previous years¹⁹ (roughly 2005-2017), nevertheless, Finland is still seen by other EU actors as a strong supporter of policy coherence. Equally, Finland did actively support the Commission's proposal for the post-Cotonou negotiating mandate and in its conduct of the NDICI negotiations during the Presidency adopted positions consistent with that mandate (e.g., inclusion of the EDF in the EU budget). However, the post-Cotonou talks have progressed much slower than hoped and, in the process, they limited the scope to discuss one of Finland's priorities, EU-Africa relations during the latter period covered by the evaluation.

The example of the Consensus is instructive as the effort put in there to entrench strong language on SRHR and gender equality has proved to be an important foundation on which to fall back on when difficulties arose in later years on other EU debates related to gender equality such as on GAP II and GAP III. For the drafting of the Consensus MFA officials worked with 17 like-minded states led by Denmark to push for more ambitious language on gender equality (particularly SRHR) and bring it up to the Beijing Declaration standard. There was opposition from a few MS, but the majority was large enough to agree the changes. Minister Kai Mykkänen (Minister 2016-2018) also sent a letter to the Commissioner Mimica (DG DEVCO) in advance of development ministers informal meeting in Tallinn (Estonian Presidency, 2017) advocating for more funding for SRHR. The Consensus is an important foundation text for EU development cooperation and recognised as such by Finland which has been a strong supporter of the Commission's promotion of the policy statement.

19 The twelve years from the Council conclusions on PCD in 2005 to the publication of the European Consensus in 2017 really constitute the most intensive years of the EU debate on PCD (Mackie, James. "Promoting policy coherence: Lessons learned in EU development cooperation", *ECDPM/CASCADES Brief*, September 2020, <https://ecdpm.org/publications/promoting-policy-coherence-lessons-learned-eu-development-cooperation/>)



The Team Europe debate emerged out of the COVID-19 response at a late stage of the evaluation period. Finland has got involved in this discussion both in Brussels and at the country level as is evident from both the Nepal and Tanzania case studies. In Brussels the Perm Rep staff member working on opportunities for the Finnish private sector is following the debate as are officials in Helsinki. The D4D TEI in particular is being followed closely by the MFA which includes 12 EU MS. Within the D4D Hub, Finland has assumed the leadership of the Digital Connectivity working group of the Hub's Africa branch together with France while acting as a member in the three other working groups. This engagement is taken forward by MFA representatives from Helsinki and from the Perm Rep. However, as indicated by EUD and embassy responses to the survey, it is increasingly apparent that apart from the initial discussion on the TE framework, most of the running on TEIs will be at the partner country level. Both Nepal and Tanzania offer good examples of embassy staff getting involved in the preparation of such national level TEIs (e.g., in Tanzania a TEI on the blue economy and in Nepal a TEI on climate change adaptation with GCCA+ funding called GRAPE).

The case studies on Nepal and Tanzania also brought out that Finland was well involved in the joint programming process to prepare the MIP for the 2021-2027 MFF in both countries. This was particularly evident in Nepal with its very small number of EU MS present, so Finland was able to play a central role that was recognised and welcomed by the EUD. In Tanzania, with its much larger group of MS bilateral programmes, Finland's contribution was less prominent and mainly came down to an active participation in the MIP preparation process and commenting, more than other MS, in the resulting action documents (especially on the one on gender equality).

The Finnish EU Presidency in 2019 required extensive organisation to ensure coherent and efficient implementation. This involved the MFA in making detailed preparations (drafting manuals, a code of conduct, training sessions), a specific choice of approach (conscious change of style with a focus on facilitation, consensus building and inclusiveness) and the organisation of events to raise the profile of particular themes and encourage networking. In terms of content there was also a careful prioritisation of issues influenced both by EU needs and Finnish priority topics. Particularly high-profile issues for the Presidency proved to be the NDICI negotiation (including difficult points on migration and the role of European Investment Bank (EIB)), the debate on the European development finance architecture and the EFSD+ and the GAP II Annual Report Council conclusions. Finland adopted an inclusive and flexible approach that was widely appreciated by officials in the MS, the EP, the Council Secretariat and the Commission, but also took some chances and was prepared to break with precedent (e.g., calling an informal meeting of the NDICI group in Helsinki which helped create a conducive atmosphere in the group and involving the EIB and Commission in direct negotiation and drafting of the relevant part of the text of the NDICI Regulation). Interviewees in Brussels expressed widespread approval of the professional, inclusive and efficient conduct of the Presidency (see also presidency brief and outcomes).

Respondents to the survey felt Finland was particularly strong in joint management of programmes and donor coordination as well as in building coalitions with the EU and EU MS. They had also played a strong role in debates on the rights of women and girls and on education and, to a lesser extent, on discussions on the sustainable use of natural resources.



4.2.4 Outputs: Creating a clear and visible stance

Criterion: Finland's stance has been visible and well understood by the European Commission and EEAS as well as by other EU institutional actors and MS

Finding 2.4: Interviewees generally felt Finland was clear and visible in its policy positions and that these were well understood by the EU institutions and MS. EU institutions' interviewees often emphasised the commonality of Finland's position with those of the EU and stressed that Finland was a reliable partner in pushing these views in EU debates.

Comments made in the survey (see Volume 2) indicate that among the EUD officials who responded there was little doubt that Finland makes itself well understood, as evidenced by the examples presented in Box 6 below.

Box 6 Examples provided by EUD officials illustrating good communication by Finnish counterparts

- *“Finland was always an active contributor to the various debates in EU context underlining very well Finnish priorities.”*
- *“Clear communication.”*
- *“The Finish colleagues have consistently managed to communicate their principles and objectives ... both in bilateral meetings as well as multi stakeholder meetings.”*
- *“You are asking whether Finland has been ‘understood’ – and this is clearly the case. The development counsellor is engaged, she communicates clearly, friendly, and effectively.”*
- *“Finnish messages have been understood to a great extent.”*
- *“My counterpart at Finnish Embassy always speaks openly. The same applies to the Ambassador.”*

Source: Survey

MFA sector advisors also reported their impression that Finland's positions on priorities such as gender equality or disability inclusion are well understood, and that Finland is seen as a go-to country on these areas of expertise. This is also confirmed by EU officials in the same fields. Small State Theory also encourages small states to build up their credibility in external policy and cooperation (SST-H5) and ensure they base their arguments on solid evidence and expertise (SST-H3).

The two case studies on Nepal and Tanzania both report strong evidence on EU group (EUD and other MS embassies) awareness of Finnish positions. In Nepal it was concluded the EUD and MS knew and understood Finland's position on water, sanitation and hygiene (WASH), education and gender equality and in Tanzania it was felt Finland has created an identity through its approach focused on concrete objectives and working in different geographic areas. In Brussels solid awareness of Finland's positions in key areas was also apparent in many of the interviews with MS and EU institution officials.



A number of EU officials, for instance in Nepal, emphasised that they saw the influencing going both ways between the EU and Finland as they shared a lot of similar values. It was therefore more a question of constructing a common European agenda on development cooperation together.

4.2.5 Outputs: An influential role on priority issues

Criterion: Finland has established a leading or influential role on some priority issues

Finding 2.5: Finland has a well-recognised leading and influential role, particularly on gender equality (SRHR, transformative approach), human rights-based approach (HRBA) and sustainable use of natural resources. Education is another area where its leadership is recognised and respected. Its expertise on disability inclusion is recognised, but less prominent. Finland has also maintained its reputation as a leader in the forest sector, although it is sometimes seen as reluctant to use the expertise. The increased efforts of the MFA in climate action and diplomacy have raised Finland's pro-file gradually since 2019.

The evidence collected, both documentary and interviews, consistently pointed to a few areas where Finland plays a leadership and influential role. This was particularly the case on gender equality and SRHR, education, disability inclusion and forestry, though in specific contexts Finland was also known for leadership in other areas, such as WASH in Nepal or HRBA in both Nepal and Tanzania. On climate action, Finland has been making efforts to raise its visibility internationally since 2019. Examples are the recent engagement in climate diplomacy efforts and adaptation finance discussions that take place in the context of the EU's external action and UNFCCC negotiations. Here, the nexus between forests, biodiversity, climate change mitigation, and adaptation is underlined. In other words, Finland is recognised as a leader in some of its own key development cooperation priority areas. This is also a strategy that is consistent with Small State Theory which encourages small states, with their often limited resources, to concentrate on a few carefully chosen objectives (SST-H1).

On gender equality and SRHR Finland's strong views are widely known, but its stance on the gender transformative approach still often requires more explaining, though specialists in the area such as in the DG INTPA Gender Unit are well aware of this and respect Finland's expertise in this area.

Several interviewees suggested Finland's stance on inclusiveness and disability inclusion is known, but EU officials do not see it as one of Finland's high-level priorities, at least not in development cooperation (seen as stronger in the humanitarian aid field). This view is also confirmed by MFA officials.

EU and EU MS in Nepal acknowledge Finland's leading role in WASH, HRBA and some parts of gender equality and social inclusion (GESI), particularly on changing social attitudes to menstrual hygiene in the RVWRMP project (which can be understood as part of SRHR). Finland's significant role in the gender transformative approach of RVWRMP was also recognised in Brussels. Finland's storytelling methodology for monitoring attitudinal change has been used in a subsequent UN Women project to measure a transformative (behavioural and norm) change as reflected in GAP III. Forestry is an area in which Finland used to be very active and successful in Nepal, but from which it then pulled back much to the dismay of the EUD. More recently Finland is considering re-engaging in the sector in Nepal, though not directly, but as part of natural resource management in local government.



The EU and MS in Tanzania recognise Finland's leadership role notably in the gender equality and forestry agendas, and also, though to a lesser extent, in the area of governance, including human rights and taxation. In the area of forestry, Finland is recognised for its long track record in the sector in the country, and for the technical expertise of its specialists and staff, which makes it the 'go-to donor' in the forestry sector. The EU has contacted Finland to get 'inspiration' on its programming and partners. In the area of gender equality, it is especially recognised for its focus on gender-based violence, women's leadership, and mainstreaming. In terms of governance, there is evidence of a more vocal role in the human rights agenda at the beginning of the evaluation period that has evolved into more concentrated support in the area of taxation and mainstreaming of HRBA.

Protection of forests is also an area where Finland, during its Presidency, played a pivotal role in pushing for the adoption of the Council conclusions (Council of the European Union, 2019b) on the EU Communication on Stepping up EU Action to Protect and Restore the World's Forests though really in terms of EU internal rather than external policy.

Education is another area where Finnish expertise is widely recognised and respected as is apparent in evidence from both Nepal and Ukraine. Finland's demonstrated lead expertise in the education sector, coupled with its long-standing partnership with the Ukrainian Ministry of Education, was in the eyes of the MFA key in getting the EU on board. *"Finland is the biggest bilateral actor in primary and secondary education, EU had an agenda and realised it would be easier to channel their funds through Finland."*

Finally in the survey, the first four areas (in order of priority) where EUD respondents felt Finland is a leading or particularly influential actor were: (i) rights of women and girls/gender equality, (ii) sustainable use of natural resources, (iii) education and (iv) HRBA. Though in some of its other policy priorities such as climate resilience it is not seen as a leader or influential actor.

Finland's positions on policy issues are generally well known and it has a well-recognised leading and influential role particularly in the areas of gender equality (SRHR, transformative approach), HRBA and non-discrimination, topics aligned with its thematic priorities. Forestry and education are other areas where its expertise is recognised and respected. Equally, its know-how and stance on disability inclusion is recognised, but less prominent. On the other hand, it is not known as a leader on climate resilience.

4.2.6 Outputs: Influencing EU financial decisions

Criterion: EU financial decisions and disbursements are in line with Finnish interests

Finding 2.6.1: In terms of major long-term policy impact the most important EU financial decision that was consistent with Finnish interests during the period of the evaluation was the major achievement of maintaining the volume of ODA in the new EU MFF (2021-2027) (all ODA is now in the NDICI-GE).

Finding 2.6.2: There are a few instances of EU financial decisions at the partner country level that are in line with Finnish interests, such as the EU delegated cooperation funding for the Finnish water project in Nepal. These have been positive first experiences requiring some flexibility on both sides, but scaling-up this practice will probably entail more systematic adjustments to Finnish programming procedures.



One of the objectives Finland adopted for the NDICI negotiation was the maintenance of the volume of ODA in the new EU MFF (2021-27). This was in line with the Commission's proposal for the new MFF, but was maintained through the negotiations as a result of pushing by various MS including Finland. Although Finland was not alone in arguing for this, it is nevertheless an important achievement given that this was in the context of Brexit and the resulting 15% hole created by the lack of a British contribution to the EU budget. The position Finland took on this is also consistent with SST-H6 that notes small states tend to support the community-centred approach in the EU rather than an intergovernmental one. In this case the latter position would have argued for a reduction of the EU budget and a de-facto renationalisation of ODA. This can therefore be seen as a very significant achievement for countries like Finland that argued for this.

The EU financial decision in 2016 to fund the RVWRMP with EUR 20 million is strongly in line with Finnish interests and has meant that EUD spending has increased in Finland's priority areas of WASH, HRBA and GESI. EUD interests were also included to a large extent in the project, and the win-win arrangement was considered to be very fruitful for a functional, long-term cooperation. These positive experiences have contributed to further spending in areas of Finland's interests, and particularly in the education sector there appears to be an EU interest to replicate delegated cooperation funding, though this proved not to be possible due to limited budgets on the Finnish side. To become eligible to manage EU delegated cooperation funding in Nepal the MFA underwent a pillar assessment. This makes it possible to extend the arrangement elsewhere providing the MFA also has the necessary internal capacity to manage multiple grants of this nature, which some interviewees expressed doubts about. Equally, embassy and EUD staff did raise concerns about the practical feasibility of synchronising the different Finnish and EU procedures for programme approval. Ways round this were found, and small adjustments made, but if the MFA wished to scale-up the use of delegated cooperation, then more systematic adjustments would no doubt be required and probably largely on the Finnish side.

Equally, the EU's decision to provide delegated cooperation funds to Finland for the RVWRMP moved the EU away from just providing budget support to the central government in Nepal and got them to also make a policy shift and start funding programme work at a local level in different parts of the country.

The latest EU MIP in Tanzania (2021-2027) is aligned with Finland's priorities. The three core thematic areas are the Green Deal (including forestry), human capital and employment (with a focus on education, and inclusiveness as a cross-cutting objective), and governance. In the first action documents that have emerged from the Annual Action Plan 2021, Finland's priorities have been mainly reflected with respect to gender equality and taxation, which shows the active participation that the Embassy had during the process of formulation of the MIP and the first action document particularly in these two areas. On gender equality, this resulted in the drafting of a specific action document adopting 'gender transformative' language in its title, to which the EU contributes EUR 70 million. As for taxation, Finland reinforced its already active participation in the MIP process in its successful experience with the Tanzania Revenue Authority. This was reflected in the action document on green cities, which has as one of its strategic objectives 'promoting and enabling regulatory and policy environment to enhance local revenue mobilisation', a topic close to Finland's interests in governance linked to taxation. The EU's contribution to this component is EUR 30.6 million.

In sum some limited instances emerged of EU financial decisions at the partner country level that have clearly been in line with Finnish interests, such as the delegated cooperation funding from the EU for the Finnish water project in Nepal (RVWRMP) or in Tanzania where the latest EU MIP



is aligned with Finnish interests. In terms of major long-term policy impact the most important EU financial decision consistent with Finnish interests during the period of the evaluation was maintenance of the same level of ODA in the NDICI in the new EU MFF (2021-2027).

4.2.7 Outputs: Establishing a professional image as a trusted actor

Criterion: Finland's image as a trusted, professional and effective development policy and cooperation actor to be followed is well recognised and respected

Finding 2.7.1: Overall Finland is widely seen in the development sector, both within the EU and beyond, as a trusted, highly professional and effective actor in development cooperation with whom other EU actors are happy to work.

Finding 2.7.2: There is strong evidence from other EU actors that Finland's performance in development cooperation is recognised and respected. Finland's approach is appreciated by the EU not least because it is systematic, iterative and long-term, but is also seen by some officials as relatively cautious.

A wide variety of officials in the EU institutions and MS do have a positive image of Finland as a highly professional and effective development actor. This was felt to be true in Brussels as well as in the partner countries reviewed in the case studies of Nepal and Tanzania. Finnish officials are also generally seen as well organised and prepared, honest and approachable.

All the interviewees at the EUD and MS in Nepal have a positive image of Finland as a development actor. There is a high degree of trust and its long record of cooperation work in the country adds to the respect Finland enjoys in Nepal. The way Finns work is considered as professional, cooperative and constructive, coupled with a high level of expertise. One EU interviewee in Brussels stated: *"We feel lucky to have Finland in Nepal"*.

All stakeholders interviewed in the EUD and the EU MS in Tanzania have a positive image of Finland as a development actor. This opinion is shared by other stakeholders, including UN agencies, and the good dialogue with the government is also emphasised. Finland is noted for its credibility, its long-standing presence in the country, its technical expertise in thematic areas such as gender equality and forestry, and its comprehensive knowledge of the country and local structures.

Finnish officials also understand the importance of trust-building with partners and stakeholders. This was for instance visible in the approach taken to their EU Presidency in 2019 which put considerable emphasis on trust-building during the preparatory phase and in the discussions during the Finnish tenure. Equally for Ukraine MFA officials interviewed stressed 'trust-building' as one of the reasons for using sector experts: *"People need to be there to create trust and to make your points clear"*.

One EUD official interviewed saw Finland's approach as systematic, iterative and long-term which is largely appreciated by the EU but is also seen by some officials as relatively cautious, indicating an aversion to taking risks.

There was also considerable evidence from interviews with independent observers that Finland's performance in development cooperation is seen in a positive light. One example is the way the DG INTPA officials wanted the gender equality aspects of the RVWRMP project in Nepal presented at the European Development Days in Brussels. In another context, many interviewees in Brussels



commented how they felt the Finnish Presidency of the EU had been well prepared and was run in a thoroughly professional manner.

Finland's strong professional image in development cooperation is also consistent with Small States Theory that argues for respectability and credibility to strengthen their position (SST-H5).

4.3 Effectiveness and outcomes of influencing (EQ3)

EQ3 To what extent has the Ministry succeeded in attaining influencing objectives/ changes in the EU for the advancement of the Finnish and international development agenda and interests?

Summary Answer: In the areas examined by the evaluation 18 outcomes were harvested and carefully analysed in terms of significance. A quarter of them involved policy shifts endorsed by the three key EU institutions and is therefore of major significance. The remainder are of more limited significance, often of a more operational character of policy shifts at a regional or country level.

Gender equality stands out as an area where Finland has achieved multiple outcomes though its ambitions on SRHR were not entirely met. There are also individual outcomes relating to other thematic priorities (e.g., rights of persons with disabilities, education), but no specific outcome on Africa. During both the process moments of the EU Presidency and the NDICI negotiations Finland successfully achieved various outcomes it was seeking.

4.3.1 Outcome harvesting: the overall results

A total of 18 influencing outcomes over the review period were harvested, including 12 at HQ level and 6 in partner countries. These were collected and verified in the harvesting process. They were identified in the thematic priority areas and process cases, and in the country case studies agreed with the MFA. This is therefore not an exhaustive list of potential influencing outcomes achieved during the period under review and a different methodology might well have identified others.

The outcomes identified reflect well some of Finland's thematic priorities, with nine outcomes (including two in partner countries) covering human rights, gender equality and disability inclusion, and one in education. No outcomes were identified in the priority areas of governance/HRBA and climate/forests. At the same time, consistent with Finnish development policy, all outcomes contribute directly or indirectly to many of the 2030 Agenda's SDGs (Figure 4).

Demonstrating the importance of specific opportunities for influencing the EU, six outcomes were achieved during the Finnish Presidency in 2019 and four as part of the NDICI negotiations. To avoid giving a false impression of the overall level of success in achieving outcomes, each one is listed only once in Table 1 even though it may fall under several categories. This cross-labelling is indicated to some extent as possible. As explained in section 2, the implementation of the outcome harvesting approach adopted for EQ3 prompted a reworking of the initial judgement criteria. The findings for this section are therefore presented under two headings: Significance of outcomes and performance against objectives. A further section (4.4) provides a transversal analysis and findings on the enabling and hindering factors for all outcomes.



Figure 4 Outcomes



Source: Evaluation team, outcome harvesting



4.3.2 Significance of influencing outcomes

Finding 3.1: The 18 outcomes identified include several where Finland has succeeded in different ways to influence EU development policy in Council discussions, but also more operational decisions in partner countries. Various outcomes were also achieved during the special circumstances of Finland's EU Presidency in 2019.

Finding 3.2: Five Outcomes reflect key EU decisions involving a policy shift that is approved by the Commission, Council and Parliament, with active influencing from Finland, alongside other like-minded states. Another thirteen outcomes reflect changes of a more limited scale and significance often at a country level or on programming. The combined ratings on the significance of the agreed changes, level of commitment and Finland's contribution show a range of success stories, each achieved for different reasons. Those scoring the highest typically (but not only) reflect key EU decisions or policy shifts (with potentially wide implications) that involve all 3 EU institutions and active influencing from Finland, alongside other like-minded states. During the Presidency, Finland also made a visible and significant contribution to resolving disagreement amongst MS and EU institutions. Finally, Nepal provides a unique example whereby the MFA used its partner country experience to influence an EU position in Brussels.

Table 1 is organised by topic and gives the ratings for each outcome. The highest scores relate to cases where the significance of the outcome (criteria 1+2) is rated highly both in terms of the outcome itself (criterion 1) and the degree of EU commitment (criterion 2), that is where not only the Commission approves the change, but it is also endorsed by the Council and Parliament indicating a very high level of EU commitment. The significance of the effort required by Finland (criterion 3) then adds additional points. These ratings show how the outcomes fall into two rough groups:

A. The highest scores are thus achieved for the following outcomes, each reflecting contrasting outcome stories with the EU institutions in Brussels:

- **Outcome 5:** As confirmed by EU and MFA key informants, a major success in relation to gender equality remains the adoption of gender equality / SRHR language in the 2017 European Consensus on Development. The reference to gender equality in the Consensus has since become an important benchmark for Finland and other like-minded states. This document was approved by both Council and Parliament though it is not legally binding. Finland was visibly active at the time, influencing the EU with other like-minded states (see section 3 and gender equality brief).
- **Outcomes 1, 2, 3 and 12:** Finland also met most of its development cooperation objectives during the NDICI negotiations (Outcome 1). After a 4-year process, the NDICI was formally approved by the Council and Parliament under German Presidency in June 2021. During the negotiations, Finland's negotiating tactics varied according to the thematic area and the moment in the negotiation process (see Box 7).
- Looking more specifically at the significance of the Finnish effort to achieve certain outcomes, **Outcomes 2, 3, 6 and 12 are those where Finland faced most resistance.** The first two (Outcomes 2 and 3) relate to difficult moments in the NDICI negotiation, the third to the opposition encountered on SRHR language in the GAP II annual report (Outcome 6) and the last (Outcome 12) on the unexpected need to revise the Council directives for the EPA negotiations.



Box 7 Negotiating tactics used by Finland

- For thematic issues strongly backed by other MS (or Commission), such as the overall emphasis on gender equality and the principle of a single instrument, Finland acted more as a follower. In contrast, Finland was found to be actively pushing thematic priorities that are more unique to Finland's interests (Arctic), or only concern a few MS (forestry).
- On the other hand, within the wider discussion on gender equality, Finland also worked with other like-minded states to strengthen the language further on SHRH and where this met opposition from some MS which would have compromised one of its red lines, it chose to pull back and rely on the agreed text in the 2017 Consensus.
- For the Presidency in 2019, Finland's role switched from pushing its own priorities to one of an 'honest broker' that is generally expected of the MS with the Presidency, but even this role does allow the presidency country some scope to influence by setting the terms of the debate and the agenda. Thus, for instance, in the NDICI negotiations during the Presidency, Finland made sure not to allow the principle of the single instrument to be reopened even though some MS still had reservations.
- During the Presidency, Finland succeeded in finding temporary compromise solutions amongst MS on divisive topics, notably the role of EIB in the new financial architecture (Outcome 2), and the approach to tackling migration in NDICI (Outcome 3); each compromise solution was formally adopted by the Council. Finland also spearheaded the revision of the directives for the negotiation of Economic Partnership Agreements with the ACP countries and regions, as approved by Council in December 2019 (Outcome 12).

Source: Evaluation team based on interviews and documentary evidence

B. Medium level scoring is common for influencing outcomes in partner countries and other examples of influencing successes in Brussels, as follows.

- **Outcomes 13-18:** In Nepal, Tanzania, and Ukraine the MFA has influenced the EU on **funding decisions** with additional EU funding secured for Finland-led projects in sectors where Finland has had a long experience). In Nepal and Tanzania, the MFA also visibly influenced EU **programming**, notably in relation to the gender transformative approach, and now within ongoing TEIs. Finland's gender transformative approach in Nepal also influenced GAP III, a useful example of inter-connection between influencing channels in partner countries and policy processes in Brussels.
- **Outcomes 6, 7, 9, 10 and 11:** At the level of **global and/or regional programming**, Finland has been successful in influencing the EU (principally the European Commission) as follows:
 - Finland has actively encouraged the European Commission to adopt a more ambitious gender action plan, with stronger or more explicit language on disability inclusion, gender transformative and inter-sectional approach (Outcomes 6, 7 and 10) and to set up a gender transformative approach expert group (Outcome 8). These successes were built on Finland's working closely with like-minded officials in the Commission and other MS.



- The MFA has also come to influence EU's response to Commissioner Urpilainen's personal pledge to increase the share of education in EU development cooperation, with the European Commission notably committing to an increase in its contribution to the Global Partnership for Education (Outcome 11).
- Since 2021, the MFA has also visibly continued to push for the priorities it succeeded in having included in the NDICI (Outcome 1), to then be implemented in the NDICI global and regional programmes during committee meetings (not seen as a new outcome).
- Called upon to draw from its human right-based approach expertise for advice, Finland also played a leading role in helping the European Commission revise its toolbox on HRBA. (Outcome 9).
- **Outcome 4:** During the 2019 Presidency, Finland also successfully led the Council discussion with the Commission and Parliament on **NDICI** during the first round of negotiations. This implicated all the three EU institutions but did not involve a formal decision on their part.
- **Outcome 8:** In 2022 Finland took the lead, having secured the agreement of the Commission and other MS, to establish a gender transformative working group from among the members of the EU Gender expert group, to study practical ways of encouraging gender transformative approaches.

In this group of medium-scoring outcomes, the significance of the Finnish effort to achieve them is always in the median point of the scale except for in **Outcome 1 in the NDICI negotiation** where limited effort was required for maintaining two points, the principle of the single instrument and the language on gender equality, and a third – strong language on climate in the regulation – where Finland omitted to push due to a misunderstanding (explained further below) with other parties.

Overall, these examples illustrate the wide variety of outcomes that Finland has been able to push in EU development policy and cooperation during the evaluation period. Each one is individual in terms of both the objective to be achieved and the path followed to reach them. The difficulties involved relate both to the topics and to the level in the EU institutional decision making to which they have to be pushed. While Finland as an EU MS can be most active in the Council preparatory groups, it needs to invest some energy in influencing the Commission. As the list shows, positive outcomes can also be achieved in more operational decisions on EU work in partner countries. Here the institutional process is simpler as the Parliament is not an actor and the number of MS present will be substantially less.

This process of outcome harvesting has concentrated on outcomes that have been achieved. Yet there are also some that were not achieved. Some of these the harvesting process did pick up on, however. Examples of this lowest level of influencing effects on EU policy, despite Finland's objective in these areas can be for various reasons. In the first two examples below the factors explaining the non-outcomes were largely external and outside Finland's control, whereas for the latter two the factors were more internal to Finland and thus meant a couple of missed opportunities.

1. **On Africa:** Despite this being one of Finland's priorities, during the Finnish Presidency in 2019 there was a lack of opportunities to shape EU development cooperation in Africa, because of the stalled Cotonou negotiation process. Instead, the MFA focus was shifted to public communication on Africa.



2. **On gender equality:** While Finland's overall success rate on influencing EU policy on gender equality is high, the target on further improving language on SRHR in certain Council documents ran into difficulties due to strong opposition from some MS. The best example of this is a failure to agree on Council conclusions on GAP III in December 2020. The result was that only Presidency Conclusions could be agreed on GAP III and these carry less weight. In this case, faced with this resistance, Finland took a step back and focused instead on maintaining the 'red line' of solid pre-existing language in the European Consensus.
3. **On climate in the NDICI:** Finland failed to take a more pro-active role to push for a more ambitious target, but instead relied on other parties to improve the language on climate in the regulation, who then failed to do so. The MFA thus did not prioritise or failed to voice its climate change objectives clearly enough in this case.
4. **On forestry:** During the Presidency in 2019, despite chairing the Council working group preparing Council conclusions²⁰ on action to restore the world's forests, Finland concentrated on domestic forestry issues and did not seek to influence the EU development agenda on global forestry despite it being a priority. In terms of development concerns this was also something of a missed opportunity. This case is explored in more detail in Box 8 below.

Box 8 Protection of World's Forests – a missed opportunity for influencing

In July 2019, at the start of the Finnish Presidency the Commission adopted a Communication on World Forests²¹ announcing regulatory measures on EU-driven global deforestation. In due course this led to the European Commission (November 2021) tabling **a legislative proposal aimed at curbing deforestation and forest degradation driven by the expansion of agricultural land used to produce specific commodities**, namely cattle, cocoa, coffee, palm oil, soya and wood. The proposal imposed due diligence obligations on operators placing these commodities and some derived products on the EU market or exporting them from the EU. The legislation was then also referred to in the European Green Deal, the EU biodiversity strategy for 2030 and the Farm to Fork strategy.

The matter was extensively discussed in Council working groups (notably in those for forestry, environment, agriculture and CODEV) which led to Council conclusions being adopted on 19 December 2019²². The forestry group that led the discussion included experts from the Finnish Ministry of Agriculture and Forestry, who also chaired it during the Presidency. The discussion gained considerable momentum with a concerted effort between these groups which apparently was, at least partially, promoted by the Finnish experts pushing the issue and collaborating on it in the working groups. However, it also seems that Finland did not play a strong role in the development policy aspects of the debate. Commission interviewees confirmed numerous contacts with Finland in preparation of the Communication but said that these were on Finland's domestic issues, not development policy. Most of their contacts were with the Ministry of Agriculture and Forestry and forest industry associations.

20 Council conclusions on forestry, 19.12.19, <https://www.consilium.europa.eu/media/41860/st15151-en19.pdf>

21 The EU Communication on *Stepping up EU Action to Protect and Restore the World's Forests*, European Commission, 23 July 2019, https://ec.europa.eu/environment/forests/eu_comm_2019.htm

22 Council conclusions on forestry, 19.12.19, <https://www.consilium.europa.eu/media/41860/st15151-en19.pdf>




Apparently, the role of the Ministry was stronger than that of the MFA throughout the whole process and particularly so in preparing the legislation. Finland's main concern in the preparatory work was apparently on the future of the FLEGT Action Plans and Voluntary Partnership Agreements and the concerns of Finland's domestic forest-based industries. Finland also paid some attention to trade issues, and these do affect developing countries.

In conclusion, it has to be noted first, that while the Communication and the legislation are significant from a development policy perspective this is not as a result of Finland's efforts; and second, while the Communication may have been important, perhaps fundamental to Finland and because of Finland, it seems for domestic rather than for development policy reasons. This suggests that at the very least, Finland missed an opportunity to push development issues in a relevant debate for both forestry and climate change when it was in a strong position to do so.

Source: Evaluation team based on interviews and documentary evidence



Table 1 List of outcomes by category and by significance of result and effort

Process case outcomes	<p>Outcome No. 1 <u>NDICI</u></p> <p>Finland met most of its development cooperation priorities during NDICI negotiations (gender equality, single instrument, Arctic, forestry)</p> <p>2019</p> <p style="text-align: right;">Result: 7 Effort: 1-2*</p>	<p>Outcome No. 2 <u>NDICI</u></p> <p>During Presidency: Council mandate in NDICI negotiation was revised and Council conclusion on the role of EIB/EFSD+ adopted, allowing NDICI negotiation to stay on track</p> <p>2019</p> <p style="text-align: right;"> Result: 5 Effort: 3</p>	<p>Outcome No. 3 <u>NDICI</u></p> <p>During Presidency: Compromise solution was found on the reference to migration, allowing NDICI negotiation to stay on track</p> <p>2019</p> <p style="text-align: right;"> Result: 5 Effort: 3</p>	<p>Outcome No. 4 <u>NDICI</u></p> <p>During Presidency: Trilogue process with EP+COM started, leading to successful negotiation for first round (Cluster 1)**</p> <p>2019</p> <p style="text-align: right;"> Result: 2 (+) Effort: 2</p>
Thematic case outcomes	<p>Outcome No. 5 <u>Gender equality</u></p> <p>The language for gender equality / SRHR was strengthened in the 2017 European Consensus for Development and before this, to a lesser extent – in GAP II (2015)</p> <p>2015-2017</p> <p style="text-align: right;">Result: 7 Effort: 2</p>	<p>Outcome No. 6 <u>Gender equality</u></p> <p>During Presidency: Council conclusions on GAP II annual report (with some reference to SRHR) were adopted by consensus</p> <p>2019</p> <p style="text-align: right;"> Result: 4 Effort : 3</p>	<p>Outcome No. 7 <u>Gender equality</u></p> <p>The language on gender transformative approach has been significantly strengthened under GAP III</p> <p>2020</p> <p style="text-align: right;">Result: 5 Effort: 2</p>	<p>Outcome No. 8 <u>Gender equality</u></p> <p>A gender transformative working group has been set up</p> <p>2021</p> <p style="text-align: right;">Result: 4 Effort: 2</p>
	<p>Outcome No. 9 <u>Governance / Human rights</u></p> <p>Finland has influenced the EU in the language and content of the 'EU Toolbox on HRBA', which was updated in 2021</p> <p>2021</p> <p style="text-align: right;">Result: 4 Effort: 2</p>	<p>Outcome No. 10 <u>Disability inclusion / Rights of persons with disabilities</u></p> <p>During Presidency: Language on intersectionality and inclusiveness was integrated into Council conclusion on GAP II progress report</p> <p>2019</p> <p style="text-align: right;"> Result: 3 Effort: 2</p>	<p>Outcome No. 11 <u>Education</u></p> <p>The EU has increased its contribution to the Global Partnership for Education</p> <p>2021</p> <p style="text-align: right;">Result: 3 Effort: 2</p>	<p>Outcome No. 12 <u>Other</u></p> <p>Council amends negotiating directives for the negotiation of EPA with the ACP countries</p> <p>2021</p> <p style="text-align: right;">Result: 5 Effort: 3</p>



Country case outcomes			COLOUR CODES Process case outcome (NDICI and Presidency) Thematic Priority case outcomes Country Case outcomes		
<p>Outcome No. 13</p> <p><u>Nepal</u></p> <p>Finland's gender transformative approach in Nepal has influenced GAP III</p> <p>2019-2020</p> <p>Result: 5 Effort: 2</p>	<p>Outcome No. 14</p> <p><u>Nepal</u></p> <p>EU has provided additional funding to Finland-led Rural Village Water Resources Management Project</p> <p>2016</p> <p>Result: 3 Effort: 2</p>	<p>Outcome No. 15</p> <p><u>Nepal</u></p> <p>EU has adopted the decentralised model of governance from the Rural Village Water Resources Management Project, for working with local authorities</p> <p>2020</p> <p>Result: 3 Effort: 2</p>	<p>*1 (single instrument, climate, gender equality) 2 (Arctic, forestry).</p> <p>**Cluster 1 "informally" agreed by both Council and Parliament, allowing negotiations to continue.</p>		
<p>Outcome No. 16</p> <p><u>Tanzania</u></p> <p>Finnish priorities (gender equality, forestry, governance) are reflected in EU MIP, with 'gender transformative' mentioned in the title of one action document</p> <p>2020-2021</p> <p>Result: 3 Effort: 2</p>	<p>Outcome No. 17</p> <p><u>Tanzania</u></p> <p>Finnish priorities and long experience in the country have shaped the scope and geographical coverage of forthcoming TEI Blue Economy in Tanzania</p> <p>2020-2021</p> <p>Result: 3 Effort: 2</p>	<p>Outcome No. 18</p> <p><u>Ukraine</u></p> <p>EU has provided additional funding to Finland-led education project</p> <p>2018</p> <p>Result: 3 Effort: 2</p>			
<p>Key to rating system: 3 criteria used with scores to be allocated for each one Full explanation and scoring for each criterion is provided in Table 13 in Annex 6.</p>					
Circumstances making the outcome (or result) more or less difficult to achieve (1+2)				(3) Significance of Finland's contribution (or effort required)	
(1) Scale of agreed change		(2) Level of commitment			
1: Consensus that reflects Finland priorities has been maintained 2a: EU has made new financial pledges at country, regional and global level that reflect Finland priorities 2b: EU has changed its approach to interventions at country, regional and global level that reflect Finland priorities 2c: EU has taken additional (intermediary) steps to promote changes at country, regional and global level that reflect Finland priorities 3: EU has made new policy commitment (incl. financial targets) that reflect Finland priorities		1: Commitment made by COM / EUD 2: Commitment made by COM and selected MS 3: Commitment formally approved by MS (Council) 4: Commitment formally approved by MS (Council and Parliament)		1: Finland as a follower 2: Finland as a leader – in situation of (general) agreement / absence of strong opposition 3: Finland as a leader – in situation of (some) disagreement	

Source: Evaluation team, outcome harvesting



4.3.3 Performance against influencing objectives

Finding 3.3: During the evaluation period the MFA has achieved most of its EU policy influencing objectives on gender equality and education, but its ambition to promote SRHR further was not met.

Finding 3.4: While Finland's Presidency was overall a success, no specific outcome was achieved in relation to Africa, despite the EU-Africa partnership being a main priority in Finland's Presidency Programme.

Finding 3.5: Finland's positions on the NDICI negotiations were largely achieved in relation to the principle of a single instrument and its geographical and thematic focus. Finland's ambition in terms of stronger language on climate change was not met, however.

As discussed in section 3.4.3, in recent years, the MFA has made its influencing objectives for EU development cooperation more explicit. At the same time, the MFA has also refrained from committing to measurable influencing targets, an approach that adequately reflects EU's complex policy landscape and the relatively small margin that individual MS can have to influence EU on their own.

As explained in this section, the list of outcomes harvested compares well with the objectives the MFA set, thereby providing a good first indication that Finland has been effective in influencing the EU for the advancement of the Finnish development agenda and interests. The detailed analysis for this is in Table 14 (see Annex 7) which gives an overview of MFA influencing objectives for each selected theme, the process followed and the extent to which these objectives have been met.

Some of the MFA's achievements against its own EU influencing objectives under **specific themes** are thus as follows:

- On **gender equality**, Finland's influencing objectives were achieved in relation to **NDICI** (85%-5% dual target), **GAP III** (focus on gender transformation), and implementing GAP in partner countries. But Finland did not achieve its ambition to get the EU to strengthen its (policy and financial) commitment to **SRHR** (as, for example, stated in the ToC (2020)). Similarly, Finland's hopes to integrate shared values and commitments to SRHR, sexual orientation and gender identity, in the **post-Cotonou agreement**, were not met.
- Concerning **climate and forests**, MFA influencing plans include a long list of relevant items – from promoting forestry in EFSD+ to strengthening the role of EU in climate actions. These objectives were only partially met. Although the NDICI regulation includes good references to sustainable forestry, the climate target under NDICI is relatively loose compared to what Finland (along with the European Commission and other like-minded states) had envisaged.
- With the EU increasing its commitment to the Global Partnership for Education (GPE), Finland has largely met its main objective under **education**, which is to strengthen the EU's global role in education development policy. The MFA developed a set of influencing objectives on education relatively recently, partly capitalising on the opportunity provided by Commissioner Urpilainen's prioritisation of the topic.
- On **rights of persons with disabilities** the language included in the GAP II Annual Report Council conclusions during the Finnish Presidency refers to intersectionality and



non-discrimination and makes specific mention of disability inclusion as well as gender equality. This was on the basis of wording provided by the MFA disability inclusion adviser.

- **Governance / human rights:** Finland was called upon to draw on its dedicated HRBA expertise for advice. As a result, it played a leading role in helping the European Commission revise its toolbox on HRBA.

Finland's achievements against its own influencing objectives in relation to specific, selected **processes** are as follows:

- Although it is too early to talk about influencing outcomes **Finland was effective in using the opportunity of TE to promote its development cooperation priorities** during programming discussions. In addition, the final text of the Council conclusion on Strengthening Team Europe's commitment to Human Development (June 2021) mentions both **SRHR and disability inclusion**, as requested by Finland, Sweden and other MS.
- Finland's two main development cooperation priorities under Finnish Presidency were **gender equality and Africa**. The **2019 Presidency programme** makes only a limited (and indirect) reference to the EU development cooperation agenda, with **EU-Africa partnership** receiving special emphasis under 'the EU as a strong global actor'. Other relevant elements include references to partnership with multilaterals and **gender equality**. The document does not specifically mention the role that Finland will play in NDICI negotiations. Table 1 already shows that seven influencing outcomes were identified and attributed to Finnish successful Presidency. While heralded as a main priority in Finland Presidency Programme, no specific outcome was achieved on **Africa**, beyond the revision of the EPA negotiating directives (Outcome 12) which was largely unplanned. Instead, Finland promoted Africa as a priority mostly through the work of EEAS and the Foreign Affairs Council discussion on the forthcoming EU-Africa Strategy and the hosting of public events.
- Finland's position on **NDICI** was largely achieved in relation to the principle of a single instrument, the geographical focus, and on thematic priorities, notably human rights, **gender equality** (see above), and (to some extent) climate action, the inclusion of the Arctic, migration, and the preference for an open architecture (with EFSD+). The NDICI approach to tackling **migration** is development-focused and comprehensive, with a dual focus on migration management and root causes of migration and, the term "*flexible incitative approach*" (language negotiated during Finnish Presidency) was retained in the final regulation.

4.4 Enabling and hindering factors to effective influencing

This section uses the evidence collected as part of the harvested outcomes and overall performance of MFA²³ first, to identify the main external factors with which the MFA has had to contend in its EU influencing work, dividing these into enabling and hindering factors. Second, it summarises some key internal factors the MFA has been able to make the most of to achieve outcomes, both on an on-going basis and then specifically during the somewhat different context of the Presidency. These are illustrated with specific examples in text boxes.

23 See thematic / process briefs in Volume 2 for more detailed evidence.



4.4.1 External factors: Circumstances of the Ministry's EU influencing work

External enabling factors

There are a number of **external circumstances** that were found to be **conducive** to Finland reaching its influencing objectives:

- **The Commission and Finland's development cooperation priorities are mostly aligned** as a consensus on many issues has been built up over many years and consolidated in periodic overarching statements such as the 2017 European Consensus. This means the Commission's proposals require limited inputs. This alignment was cited as a conducive factor for many outcomes. For example, the Commission has been advocating for a gender transformative approach since GAP II.
- **The choice of DG INTPA Commissioners (and their advisers) and their priorities are also an important factor.** Under the previous Commissioner Mimica, gender equality was a priority. Under the current one, it is now education. In addition, the current Commissioner is Finnish, which Finland rightly identified as an opportunity to influence the EU (MFA internal report, 2021a). As part of her pledge to strengthen EU's commitment to education, the current Commissioner has also appointed a Finnish education adviser with strong links with the MFA which has boosted influencing opportunities for Finland.
- **In the majority of cases, little influencing effort is required at the Council because European institutions and MS already agree** and/or there is no strong opposition from selected MS. Examples of such influencing include the first round (or 'cluster') of NDICI negotiation during Trilogue, the inclusion of sustainable forestry and the Arctic in the NDICI regulation; the drafting of GAP III (with the Commission only) and MS' response to the DG INTPA Commissioner to increase the education aid budget.
- **The hand-over (and coordination) between Presidencies is well established**, including with the established practice of organising Trio Presidencies. In the case of Finland, preparation started as part of the established **Trio Presidency**, including Romania-Finland and Croatia. There are also some good established practices, allowing the Council Permanent Secretaries and their delegates, to learn from each other. For example, delegates from the outgoing Presidency will invite delegates from the incoming Presidency to sit in some of their meetings; they also make final presentations or share hand-over notes.

At country level, conducive external factors were identified as first, Finland and the EU have largely shared goals in Nepal, Tanzania, and Ukraine. Second, EUD spending has increased in Finland's priority areas in all three countries, which opened new opportunities for partnership.

In Nepal, Finland's engagement with the EUD is seen as even more important by both sides in the COVID-19 context, after UK disengagement with Brexit and now with another core MS, Germany, phasing out its bilateral development cooperation. Finland is a recognised leader and plays an influential role particularly in gender equality (SRHR, transformative approach), HRBA, inclusion and education. In Tanzania, Finland is recognised as a leader in similar fields but with a larger number of MS present, its position and influence is less prominent.



External hindering factors

Conversely, the key **hindering external factors** to effective influencing of the EU are identified as follows:

- The influencing agenda is first and foremost **dictated by the EU's own decision-making processes** in Brussels. **Thus, much of the pre-influencing work starts with the European Commission.** While the MFA has maintained informal links with the European Commission, ultimately, the (more formal) opportunities to influence are decided by the Commission itself, which uses public consultations and sector expert meetings to call for MS inputs (including written comments) in preparation of its staff working papers and communications to the Council and Parliament.
- **The opportunities to comment on the Commission's positions vary and can at times be limited.** Although Commission and EEAS policy proposals are, for the most part, sent to the Council and Parliament as formal 'communications' for discussion and approval, not all positions formulated by the Commission are submitted to the Council's attention. **Internal Staff Working Papers**, (or Joint Staff Working Papers, when jointly submitted with EEAS) are not submitted to the Council unless they accompany a communication. This was the case with GAP II, when the EC produced a **Joint Staff Working Paper**, but no communication to the Council and Parliament.²⁴ Even when consultations do take place, Finland and other MS interviewees have complained (including, recently, during the first committee meeting using the new NDICI regulation (interviews and MFA, 2021b)), that they were not given enough time to prepare for the meetings and to coordinate positions with other like-minded states. Furthermore, when the Commission is mandated to lead an external negotiating process, as is the case for post-Cotonou or EPA, MS only have partial oversight of the negotiations.²⁵
- **Influencing is harder to achieve at the beginning or at the end of the Parliament's term or a new Commission's tenure.** In particular, the Finnish Presidency also coincided with an 'institutional gap' in the EU institutions. The new Commission (and DG INTPA Commissioner) was appointed in September 2019. According to the final MFA COREPER report (MFA, 2021a), the situation compounded the work of the Presidency, as for the first few months the outgoing Juncker Commission was effectively paralysed and the new von der Leyen Commission only started work in November 2019. Equally, the EU parliamentary elections were held in May 2019. Yet, according to a key informant, this created a sense of urgency and helped the parliamentary negotiators finalise the Parliament's position on NDICI in March 2019, four months before the new parliament was installed.
- **When unanimous vote is required at the Council, there is always a risk of diluting existing EU commitments.** Examples of influencing tactics have already been given. For example, the language in the Council conclusion on GAP II is less ambitious than the language used by the Commission in its JSWP, with no reference to SRHR. The language in Council conclusions on GAP II progress reports was subsequently strengthened under the

24 "The new framework is a Joint Staff Working Document. The status of Communication – such as that accorded to the Action Plan on Human Rights and Democracy – would have given it greater political weight. Staff Working Documents are not discussed, agreed or reviewed at EU Council level." (O'Connell, 2014)

25 For post-Cotonou, according to MFA (2019h), EU member states may be observers at Senior Officials Meetings (SOM meetings), which are being prepared by the technical level, i.e. the ACP Secretariat and Commission officials, but have not been able to attend technical level meetings. The Member States have requested the presidency's participation, but Romania decided that it would not participate in the technical negotiations as a representative of the Member States during its term of office.



Romanian and Finnish Presidencies. Even then, commitment to SRHR, is only referred to as the EU and not 'the EU and its MS'.

- On rare occasions, MS positions **are irreconcilable**, and **Council conclusions cannot be agreed**, as was the case for GAP III (see Box 9). Pre-existing documents and the language in them then remain the standard. These diverging views of what constitutes EU common values and the role that the EU should play as a global actor are often found in areas that straddle **EU internal and external affairs**²⁶.

Box 9 MS diverging views on gender equality and implications for GAP III

MS positions on gender identity and SRHR have grown further apart over the years as different political parties have won power in various MS. The diverging positions already became apparent in 2017 and were the subject of sustained discussions with like-minded states during the preparation of the Presidency. Under the German Presidency in 2021, the Council failed to reach a conclusion on GAP III notwithstanding Germany's efforts to find a compromise solution. More specifically, according to interviewees, Finland and other MS were reported as having rejected Germany's final proposal because it did not meet their 'red line' position (see section 3.2).

As a result, Germany chose to only go for Presidency conclusions. While the Presidency conclusions only engage the Presidency and not the full Council, they seek to reflect the views of the majority of MS. As a result, the earlier Council conclusions adopting the GAP II progress report under the Finland Presidency have gained significance with time, as this was the last occasion that MS unanimously agreed to a shared EU Gender Action Plan.

Source: Evaluation team based on interviews and documentary evidence

- **EU's decision-making is slow.** This is particularly the case for complex processes, involving all EU institutions such as NDICI, and/or **third parties**, such as post-Cotonou and EPA. For example, it took four years (and eight Presidencies) for the Commission, Council and Parliament to agree on NDICI.
- Because of the slow decision-making process and reliance on former Presidencies, **the timing of opportunities to influence the Council (while holding the Presidency) is hard to predict.** Occasionally, Finland had to be flexible in its approach related to gender equality and indeed reduce its ambitions, because the opportunities that it had envisaged to coincide with its Presidency did not materialise (see Box 10).

²⁶ During its Presidency, Finland's ambition to have a new gender equality policy adopted by the Council were not met. Instead narrower Council conclusions on 'Gender-Equal Economies in the EU: The Way Forward - Council Conclusions' were adopted in December 2019.



Box 10 Shifting opportunities to influence key EU processes during the Finnish Presidency

The importance of having a flexible approach to running an EU Presidency is illustrated by the following examples

Post-Cotonou: According to the negotiation calendar for post-Cotonou, negotiations on the future partnership should have been concluded during Finland's Presidency of the Council of the EU in the second half of 2019. As the negotiation process was delayed, Finland first expected to take on the negotiation of a transit agreement. This did not happen either. The Cotonou agreement was finally extended in February 2020; and the negotiations (also referred to the initialling of future post-Cotonou agreement) ended in April 2021. In addition, as mentioned before, with post-Cotonou (involving third party negotiations), the opportunity for MS (starting with the Presidency) to be involved in the negotiations (led by the Commission) remained somewhat limited.

Gender equality: From various memos, it is apparent that Finland initially harboured a hope to match its ambition on promoting gender equality by working with the Commission and Council on developing GAP III. It soon transpired (during the preparatory meetings with the EC and other MS) that this was too early and that the focus should be instead on adopting Council conclusion on the GAP II second progress report.

NDICI negotiations: On this important dossier, the Finnish Presidency benefited from the success of the Romanian Presidency in having the Council approve its negotiating mandate for NDICI (in effect reaching a first agreement over the principle of a single instrument). This allowed the Trilogue discussion to start during the Finnish Presidency. At the same time, the opportunity to make progress with NDICI during the six-month presidency remained de facto limited; an agreement was finally reached under the German Presidency in 2021.

Source: Evaluation team based on interviews and documentary evidence

- **There are other unpredictable elements that are typical to any influencing / negotiation processes.** As shown with NDICI, any negotiation process involves a random / unknown element, by which the final position of MS is only known at the end and last-minute changes are possible. This can lead to both positive and negative outcomes, which cannot be predicted. As indicated by the MFA some issues were negotiated at the last minute, and included many surprise elements. **Similarly, an internal report** (MFA, 2020c) reflects on the fact that real time pressure is often required to reach the most difficult compromise solutions. Thus, it seems that for both the EFSD+ and the migration target, the different positions only really began to move as the time window was closing.
- **In partner country contexts** the main hindering factors to influencing the EU were linked to the context and, more specifically, lack of ownership or buy-in from government counterparts in implementing projects reflecting Finland's and EU's combined priorities (Ukraine, Tanzania²⁷). A similar constraint was identified with the post-Cotonou negotiations, with ACP countries reluctant to adopt SRHR language.

27 The latter part of the evaluation period is also marked by President Magufuli's request for the Head of the EU Delegation to leave the country in 2018 (along with the Head of UN Women, the Head of the UNDP, and the Head of UNESCO who received a similar expulsion order). The disagreement was over the international community questioning the suppression of lesbian, gay, bisexual and transgender (LGBT) rights in Tanzania (CNN, 2018).



4.4.2 Internal factors: Making the most of the Ministry's options

Finding 4.1: Finland has been able to impact on the EU despite the limited scope for influencing in a system largely shaped by the EU decision-making processes. To do so it built on the relatively strong alignment between its own development policies and those of the EU, used established practices well and took advantage of available opportunities.

Finding 4.2: Finland's reputation as a credible development actor and lead expertise in selected areas remain, by far, the two main factors explaining Finland's influencing successes in Brussels and in partner countries.

Finding 4.3: Forming coalitions with like-minded states has remained an essential tool for EU influencing both when working with the Commission and during Council discussions.

Finding 4.4: Other activities and practices contributed to Finland's influencing outcomes, notably: (i) focus on cross-cutting objectives, (ii) highly consistent, visible, and transparent approach, (iii) strong links with the Commission, (iv) use of sector experts and 'strategic' placements, and (v) production of best practice and/or evidence papers.

Finding 4.5: Finland's focus on cross-cutting objectives has allowed it to follow a highly consistent, visible, and transparent approach to influencing.

Finding 4.6: Conversely, a lack of prioritisation and limited staff presence were identified by stakeholders as the main internal constraints to effective influencing.

This sub-section complements the evaluation's findings on EQ1 and EQ2, by analysing the main strategies, inputs, activities and outputs that lead to successful influencing outcomes. A distinction is made between the internal factors that contribute or hinder effective influencing 'overall' and the internal factors associated, more specifically, with the successful Finnish Presidency.

Internal enabling factors

The overall achievements against MFA's influencing objectives point to the following contributing factors that are internal to MFA:

- According to the majority of stakeholders interviewed, Finland's **reputation** as a credible development actor (with no colonial baggage²⁸) and lead **expertise** in selected areas remain, by far, the two most important factors explaining Finland's influencing successes in Brussels and in partner countries²⁹.
- In addition, during this evaluation period, the 2019 Presidency (see next section), and appointment of a Finnish Commissioner have also been positive opportunities for Finland (MFA, 2021a).

²⁸ This was a feature highlighted by Ireland in the peer review, as also one of their advantages.

²⁹ According to views expressed in the peer review, the Irish experience is apparently rather similar: "*being a credible and flexible player has been an advantage*".



In addition to the above, the following **activities and practices** were found to have contributed to Finland's influencing outcomes at HQ (outside the Presidency)³⁰:

- Finland's **focus** on cross-cutting objectives has allowed it to follow a highly consistent, visible, and transparent approach to influencing. This has been particularly the case for gender equality and disability inclusion (though less so for climate resilience). There is indeed enough evidence to indicate that Finland has made the most of every opportunity to promote gender equality and disability inclusion across all main sectors covered by EU's development cooperation. Outcome 10 (intersectionality and inclusiveness in GAP II progress report) provides a direct example of such 'mainstreaming' and of a 'piggy-backing' approach, whereby one cross-cutting objective (in this particular case disability inclusion) is promoted as part of a broader EU discussion on another cross-cutting objective (gender equality).
- Despite the scope for influencing being largely dictated by the EU institutions, MS and Finland among them, can, by remaining **well informed about the evolution of debates**³¹ and **by knowing the way EU processes work**, generate additional opportunities through proactive engagement (see section 3.2).
- Finland has **maintained strong links with the European Commission** thereby creating opportunities for influencing beyond the formal ones offered. The MFA has worked closely with relevant units at the Commission and regularly responded to their request for comments. Examples of such contributions included the 2017 Consensus, GAP III, and the EU-Africa Strategy.
- Further down the line, MS also have the opportunity, though not always, to discuss the Commission's proposals in the Council working groups. Preparing Council decisions in the working parties is an important part of the process and here using **coalitions** of like-minded members states is a crucial strategy that Finland has used extensively. This came out strongly in the peer review.
- The Council can also **ask the Commission to prepare a proposal on a specific topic for discussion** in working parties, as shown in the EPA negotiation outcome during the 2019 Presidency (see Box 11).
- MFA sector advisors have influenced EU debates through bringing dedicated, **hands-on expertise** that other MS do not have. This was particularly the case for gender equality (as further demonstrated by Outcome 8 on the gender transformative working group), disability inclusion and more recently education. Evidence from both the survey responses and the peer review³² emphasised the importance of technical expertise in influencing the EU.
- More broadly, **secondments** of experienced staff in the EU institutions, EUDs or even as experts in Finnish embassies provide another way of bringing Finnish expertise and know-how to bear on decision making at different levels.
- Finland has on occasions produced some **best practice and/or evidence papers**. This has helped to strengthen Finland's influencing positions in selected areas. Examples include Finland circulating a non-paper on promoting sustainable forestry in NDICI negotiations and

30 Outcomes 1, 5, 7, 8 and 11.

31 In the peer review, many of those interviewed stated the importance of timing and momentum as facilitating aspects of building consensus, citing successes in influencing on gender equality, migration and climate as examples.

32 One peer review country argued that the EU is characterised by highly qualified thematic specialists. So, to influence the EU, you need good technical arguments, and this is the only way to stand out for individual countries.



EU development cooperation (MFA, 2019g), and a two-pager highlighting Finland's priorities and recommendations to the EU to the Commissioner's Cabinet.³³

Box 11 Shaping the Commission's proposals: example from the EPA negotiations

Outcome 12: Under the Finnish Presidency the Council amended the negotiating directives for the negotiation of EPA with the ACP countries

During the Finnish Presidency, it became apparent that the European Commission's negotiating mandate for Economic Partnership Agreements (EPA) with ACP countries and regions (dating back 2002) had become outdated and did not reflect more recent developments and policies in trade-related areas. With the ACP working group (chaired by the Finns) in the lead, the Council requested the European Commission to submit a proposal for an update of the negotiating directives leading to further discussion between the Council and Commission. The final directives were subsequently submitted and approved in December 2019.

Source: Evaluation team based on interviews and documentary evidence

At partner country level, Finland's long-experience in some countries and sectors worked well to influence the EU. This was also emphasised as important in the peer review³⁴. In addition, as shown in Tanzania and Nepal, Finland has used its thematic expertise in specific niche areas as a leveraging point both to influence the EU and engage with other EU MS (sometimes as lead). As shown in Ukraine, while the main communication channel is between the EUD and Embassy, some strategic placement in Brussels can also play a significant role. In this country, opportunities were identified in large part through the mediation of a Finnish education and social sector expert, who was seconded to the European Commission Support Group for Ukraine (SGUA) from 2017.

Based on the above where Finland has shown **prioritisation, responsiveness, staff placements, and knowledge of EU institutions**, these have come through as key elements contributing to effective influencing (EQ1).

Internal hindering factors

Conversely, in cases when there is a **lack of prioritisation**³⁵ and **limited staff presence**, these are identified by stakeholders as the main **constraints** (or internal hindering factors) to effective influencing (see also Findings 1.1, 1.2.1 and 2.2.2).

- As an example of a lack of prioritisation, MFA stakeholders commented that the limited success in pushing climate resilience was largely explained by the influencing strategies, which encompassed too broad a range of issues; this has made it difficult to find the right entry points to promoting climate resilience.

³³ Interviews with MFA and Commission (MFA, 2021e).

³⁴ In the peer review one country representative argued that increasingly, influencing work is moving to the 'field'. Thus building up a track record and expertise working on the ground and in specific areas was an asset when it comes to being valued by the EU as credible and reliable.

³⁵ Ireland's view, as voiced in the peer review, is instructive here: "As a smaller Member State, you have to pick your battles, nonetheless this can be more effective than the larger countries being involved in everything."



- At partner country level, over-stretched embassy staff (Tanzania, Nepal) and limited knowledge of EU procedures (Ukraine) were identified as key factors limiting Finland's ability to influence the EUD that resulted in certain opportunities for influencing being missed.
- Interviews with staff suggested there are other instances of tight staffing which often prove to be a constraint for influencing (e.g., at the Perm Rep in Brussels, sector advisors working on their own, limited staff to deal with new issues such as TEIs, etc.). While some of these cases are addressed with additional staffing (e.g., Presidency) others are not leaving staff to prioritise what issues are best addressed first.

Although these two factors are identified as the key constraints on further influencing there are also a number of other internal factors which can be characterised as limiting even though they do not seriously constrain influencing or at least not for now. These have been identified in other findings, but for reference they include: (i) limited forward planning: Findings 1.1 and 1.5.2, (ii) limited capacity for managing EU delegated cooperation: Finding 1.2.2, (iii) limited clarity on internal coordination for new EU initiatives such as Team Europe and the Global Gateway: Finding 1.4.1, (iv) poor external consultation: Finding 1.4.2 and (v) no systematic monitoring and learning from experience: Finding 1.5.1.

The special case of the EU Presidency and factors enabling its success

Finding 4.7: The main internal factors explaining Finland's successful Presidency were in particular careful preparation, good staffing, flexibility and a soft, constructive and inclusive approach to managing meetings and negotiations.

With 27 MS each getting their turn, Finland will not get another EU Presidency for quite some years but given the uniqueness of the moment as an opportunity for influencing the EU, as well as the special efforts made, it is valuable to draw some lessons from the experience.

The main internal factors explaining Finland's successful Presidency were identified as follows:

- **The Presidency was well-prepared and well resourced.** As also mentioned in MFA internal documentation, good preparation was key to a successful Presidency (MFA, 2021a).
- Significant effort was invested in coordinating Finland's position so Finland's Presidency Programme reflected cross-ministerial discussion. Extensive training and guidelines were also provided to all newly appointed delegates.³⁶
- In parallel, the MFA Development Policy unit started preliminary discussions with the European Commission and other MS on various topics as early as 2018, as shown in selected memos (MFA, 2018b, 2018a, 2019a, 2019e, 2019g, 2019b, 2019d). These early discussions allowed the MFA to start thinking about key priorities for its Presidency at an early stage³⁷, in addition to developing a good understanding of other MS positions on key issues; and learning lessons from previous Presidencies.
- On staffing, using NDICI as an example, an **ambassador** (with development cooperation background) was appointed to lead the discussion. Although her appointment came a bit late, the majority of external stakeholders interviewed considered that the 2-people team

³⁶ See for example: Council of the European Union, 2019a; Finnish Government, 2019c.

³⁷ See for example (MFA, 2018d).



leading the negotiations was excellent, owing to their combined diplomatic and technical skills and strong knowledge of development cooperation. External stakeholders also pointed to Finland's **careful selection of delegates** as an important element of success.

- **Flexibility on all fronts (objective setting; schedule of events; management & reporting) was also key.** Finland recognised having little control over the landscape that it would inherit from the previous Presidency (with a lot of Council conclusions being typically made right at the end of each Presidency). As indicated in the MFA's final COREPER II report the success of the Presidency would also depend on the circumstances pertaining at the time and which were always liable to change (MFA, 2021a).
- On this basis, Finland worked well to achieve the right balance between planning ahead and allowing some flexibility. More specifically, the MFA and its development cooperation unit rightly produced a relatively broad workplan³⁸, which could be shaped and refined in the months leading up to, and, during the Presidency, to reflect the current state of negotiations on key topics.
- The same combination of planning and flexibility was used to **schedule key meetings**. As explained in an internal memo, in preparing calendars officials always pre-booked more meetings than perhaps needed on the basis that cancelling them would always be easier and less awkward for participants than booking new ones (MFA, 2020c).
- At a staffing level, as confirmed by both MFA and external stakeholders, the relatively flat management structure of the Ministry also allowed delegates to be responsive and be given **sufficient autonomy** to facilitate Council discussions, while still receiving sufficient guidance from the Ministry in Helsinki. This was identified as important, for example, during the NIDICI negotiations.

As a result of these efforts, the MFA developed a **relatively clear vision** as to what they could realistically achieve during the Presidency. As confirmed by the majority of external stakeholders interviewed, Finland's delegates were also seen as well-prepared, well-briefed and as **understanding their role** well during the Presidency. Finland's delegates, as noted in the peer review for instance, were particularly appreciated for their **soft, constructive & inclusive approach** to negotiations³⁹ (as further highlighted in Box 12). This, combined with Finland's image as a **neutral state with no colonial baggage**, and clear focus on development cooperation, was said to have contributed to create a **climate of trust and optimism** during the Council and Trilogue discussions. This climate of trust in turn allowed Finland to be at times a bit **pushier** when dealing with sticky issues, such as those regarding the role of EIB during the NDICI negotiation (see Box 12)

38 CoDEV workplan was finalised in May 2019 (see (MFA, 2019c)).

39 In the peer review the Swedish representative suggested that one success factor for influencing was to have an overall flexible approach rather than pushing too hard, but to combine that with being assertive, transparent and clear on the country's position.



Box 12 Role of the Presidency and their delegates: examples from Finland

The role of MS, when holding the Presidency, is no longer about pushing for their own priorities but about, being an **'honest broker'**. For example, the drafting of the conclusions for the GAP II progress report during Finland Presidency involved working closely with like-minded states in favour of a more ambitious language. At the same time, the role of Finland's Presidency was primarily to ensure that all MS would unanimously approve the final text.

Finnish delegates were seen as understanding this new role as facilitator and negotiator particularly well. Thus, according to MFA internal documents, officials deliberately started to take a more compromise-oriented line in the NDICI negotiations even before the Presidency (MFA, 2020c).

The delegates showed a strong understanding of how decisions are made within the EU. They also performed well in leading negotiations, as demonstrated by the outcomes harvested (see Table 1) and following practices during NDICI negotiations:

- **Combining formal and informal discussions, with external events:** Stakeholder interviews and selected memos confirm that Finland combined formal and informal discussions during its Presidency (while also making good use of public events).⁴⁰
- **Being inclusive:** There are two main examples of Finland using an inclusive approach to negotiations. First, by inviting other Council working parties to join and participate in Council discussions (Outcome 2); second by providing re-assurance to all MS and DG units that their needs and interests would not be forgotten. This was particularly the case with DG NEAR and Eastern Europe MS during the NDICI negotiation, as they feared the focus on their region would be lost with the move towards a single instrument.
- **Being innovative (and a little pushy):** As pointed out by some stakeholders, Finland also proposed innovative solutions. For example, Finland proposed the new term 'flexible incitative approach' when dealing with migration during the NDICI negotiation. Some external stakeholders also mention Finland's somewhat 'unusual' approach to bring in the EIB into the Council-Commission discussion on EFSD+. This is also an example of Finland deploying what Small State Theory refers to as a 'reframing strategy' when faced with adverse positions (SST-H4). Finally, Finland was reported by some external stakeholders as putting the right amount of pressure when a solution was near. This was confirmed in the same memo.

In addition to the above, Finland also skilfully integrated into the negotiation some of its own priorities, most notably **the inclusion of the Arctic** in the NDICI regulation, during its Presidency.

A final role for Finland was the **handover** of the Presidency to Croatia. According to stakeholders interviewed, including from Croatia, the transition process also went smoothly.

Source: Evaluation team based on interviews and documentary evidence

⁴⁰ Examples include a high-level event with Bill and Melinda Gates Foundation in October 2019.



Finally, while overall the Presidency was successful, the Finnish government, and the MFA more specifically, could have done more to **stress the importance of its agenda on EU development cooperation within the overall plan for the Presidency**. According to some Finnish external stakeholders, development cooperation appeared to have fallen down the list of priorities compared to the previous Finnish Presidency in 2006. Many topics of relevance to the development cooperation agenda (including NDICI) were indeed not mentioned in the main Finnish Presidency Programme, and subsequent progress reports. Conversely, the Finnish Programme, although promoting EU-Africa partnership as a main priority, did not take on board the limited policy opportunities to do so because of the stalled post-Cotonou negotiations. As a result, the main achievements on Africa only involved the holding of public events and some country discussions (including Sudan), with the EEAS, at the Foreign Affairs Council.

4.4.3 Conclusions on enabling and hindering factors

Enabling factors: Making the most of one's strengths

There are a fair number of facilitating or enabling factors that emerged from the research. Chief amongst these were Finland's reputation and credibility, but MFA officials also have a good knowledge of the ropes in Brussels and have used tried and tested practices such as working in coalitions with like-minded states. These are also similar to the practices of their peer MS and well reflected in Small State Theory (see summary in Annex 5).

The Ministry's influencing plans have been well founded in Finland's own policy priorities which logically are reflected in its areas of particular expertise, such as on gender equality. Finland's consistent focus on issues such as gender equality combined with the expertise it has built up in this area have thus combined to give Finland a high profile on the topic, one which is highly respected by other EU actors and gives Finland considerable influence in this area but also beyond.

The highly competent manner in which Finland handled the EU Presidency in 2019 contributed to enhancing its professional image, adding further to its ability to influence the outcomes of EU policy debates.

One further external enabling factor is that to some extent Finland has been pushing at an open door. Thus, the overall EU context has been generally conducive for development cooperation in the past period and Finland's own positions on development policy and practice have for the most part been well aligned to those of the Commission and a fair group of other MS. The influencing has thus been more a case of constructing a common endeavour with a group of like-minded actors, rather than of persuading a recalcitrant group wanting to go in another direction. That said, there are certain areas of policy (e.g., SRHR) where there are genuine major differences between EU actors and more of a struggle to keep to Finland's chosen direction.

Finally, of course, Finland's approach has been constructive, generally supportive to the Commission (SST-H6) and has played the game according to the established rules. As a small EU MS it knows it does not have the luxury of being able to swing an argument on its own or put its foot down in a manner a large MS might consider possible.



Hindering Factors: Knowing and tackling one's weaknesses

Not surprisingly a lack of resources, particularly in terms of staff time but also to some extent budgets, puts limits on the influencing efforts that the MFA officials can undertake and has meant some opportunities for influencing have been missed. That then raises the importance of effective prioritisation to use staff time as well as possible. Yet it is precisely prioritisation that is the other area that, in the eyes of quite a number of staff, is the second most important hindering factor for influencing.

Thus, the research revealed that the clarity of prioritisation in influencing is variable, there is often a lack of focus, inadequate guidance on how best to prioritise influencing work in different parts of the Ministry and its embassies and limited internal ownership of influencing plans. Some interviewees pointed to a lack of high-level leadership and a need for management to provide more medium-term vision.

There are then of course various examples of potential hurdles ahead which could become important and could be solved by more investment if the choice is made to go down certain paths. There are also opportunities to be considered. For instance, there is more scope for Finland to access EU funding through delegated cooperation, but that requires some adjustments and capacity building. There is also the question of how much Finland wants to get involved in TEIs or the EU Global Gateway. But these are precisely the policy choices that need to be made based on the Ministry's vision of its future priorities for Finland's involvement with EU development cooperation and then systems put in place to tackle them systematically.



5 Conclusions

The Conclusions chapter is divided into three sections. First it considers the actual conclusions of the study. Second it then compares these with the conclusions of the earlier study on Finnish influencing of multilateral organisations. Third it goes back to the causal argument behind the evaluation, that is the ToC advanced at the start and reassesses its validity.

5.1 Conclusions based on the findings

Conclusion 1: The MFA's efforts to influence EU development cooperation policy have yielded worthwhile results. A range of significant outcomes have been achieved that constitute a successful achievement for a small MS of the EU.

Conclusion based on Findings 3.1, 3.2, 3.3, 3.4, 3.5, 2.6.1, 4.1 and 4.2

A variety of outcomes have been achieved at different levels on both policy issues and operational questions and both in Brussels and in partner country settings.

This positive overall conclusion should be tempered with the recognition that Finland's development policy is largely in line with that of the European Commission and of many, though not all, MS. The significance of Finland's influence is thus less that it is a unique force in the EU development policy arena, but rather more that it is a strong and reliable contributor to strengthening, maintaining and improving a common endeavour, that is, the construction and defence of an effective European development policy framework and cooperation.

Conclusion 2: Finland has succeeded in a coherent, efficient and relevant manner, to promote its own development policy priorities in the EU context though not all of them to the same extent.

Conclusion based on Findings 2.4, 2.5, 2.7.1, 2.7.2 and 4.5

Finland's professional and collaborative approach and visible support for its priority topics are commendable; these have been acknowledged also by the EU partners. However, not all four policy priority areas nor the cross-cutting objectives have been followed equally. Finland's management of its EU Presidency in 2019 was generally seen as competently managed. It also showed that Finland could prioritise well and in a flexible manner to get the best results.

Among the four policy priority areas, PPA1 – the Rights of Women and Girls – comes out of this analysis by far the strongest. The cross-cutting objectives are similarly not all as strongly felt in the influencing. Gender equality again emerges as the strongest, whereas non-discrimination with a focus on disability and climate resilience come out as areas where Finland's influence has been felt more weakly, even though these are known as Finnish priorities. This concentration on a limited number of topics for influencing is consistent with Small State Theory (SST-H1).



Finland's image as a trusted, competent and professional development actor is also strong and its expertise in various areas, which generally correspond to its policy priorities, is well recognised and respected in EU circles. This gives Finland considerable leverage for its influencing efforts. The emphasis on expertise is also highlighted in Small State Theory (SST-H5).

There have also been influencing successes in other key areas that can have a long-term impact, such as the achieved in maintaining the ODA level in the development cooperation budget of the new NDICI (EU MFF 2021-27) at the same level as under the previous MFF. This was also achieved against the backdrop of Brexit and the removal of the UK's 15% contribution to the EU budget. In such circumstances maintaining the level of ODA in the budget is an outstanding achievement. Again, while Finland was not alone in pushing for this, this was an important result that is a key element for maintaining the EU development cooperation effort. In particular, during its tenure of the EU Presidency in 2019, Finland played a significant role in the successful negotiation of the new NDICI instrument and the effort to maintain the ODA level in the budget.

Finding 2.6.1 on pushing to maintain the level of the EU's ODA budget is a good example of the MFA adopting a position that is consistent with a 'community'⁴¹ approach in the EU rather than an intergovernmental one. Small State Theory argues that in the EU context the community method is preferred as it is felt to maximise the scope for small state influence in the EU (SST-H6). The alternative of decreasing the EU ODA budget, would have meant a trend towards a re-nationalisation of ODA and a more intergovernmental approach as each MS would then spend a high proportion of its ODA budget through its bilateral programme.

The MFA and some of its embassies have, moreover, acquired a good reputation with the Commission for managing EU funds in delegated cooperation. This has created new openings for Finland to further expand its work considerably beyond the constraints of its own ODA budget.

Conclusion 3: Finland has made a good start on using EU funds to expand the ODA budgets it manages, but the foundations for increasing use of this EU delegated cooperation appear to be weak.

Conclusion based on Findings 1.2.2 and 2.6.2

Both EU and Finnish officials involved in the use of EU delegated cooperation funds by Finland see considerable scope for further expansion. However, they also note the burden it places on the MFA and embassies in particular. Currently only the MFA is pillar assessed to manage EU funds⁴² and the MFA's programming procedures are not yet well synchronised with those of the EU.

In the context of restricted ODA budget in Finland making use of EU funds (to which Finland has of course contributed) is a good way to expand Finland's own development cooperation programme and the projects it sees as important. In the process it also results in regular contacts with the EU Delegations thereby building mutual trust and familiarity with each other that are a useful basis for further influencing. However, managing delegated cooperation also requires the capacity to do so which is so far limited in the MFA, so this is an area where capacity building and particularly

41 Community-centred refers to the EU's 'community' method rather than the 'intergovernmental' method – that is work is channelled through the Commission rather than kept in the hands of member states. In development cooperation both methods are used as this is an area of EU 'shared competence'.

42 Finnfund is pillar assessed to provide guarantees for the EFSD+ but not to manage EU delegated cooperation funds.



institutional capacity building (see SST-H2) will be essential if Finland wants to go further down this path.

Conclusion 4: Finland has successfully used a variety of channels for influencing despite limited resources. In particular, it has made good use of working with coalitions of like-minded states in many though not all areas. On the other hand, the weak presence of Finnish nationals in the EU institutions is a clear handicap for influencing.

Conclusion based on Findings 2.1.1, 2.1.2, 2.2.1, 2.2.2, 4.3 and 4.4

In choosing to work with coalitions Finland has followed a similar path to other small states in the EU and one that is consistent with Small State Theory (SST-H6). At the same time, it has proactively and to good purpose used a variety of other means of exerting influence that are common in the EU.

Other successful means have involved participation in governance frameworks and programming steering groups, hosting debates or events, drafting non-papers for discussion or inputs to reports, informal contacts and meetings with key partners and having nationals in various positions in the EU institutions, EU Delegations, the Perm Rep in Brussels or its own embassies.

The scope for placing nationals in key positions in the EU institutions is probably the measure out of this list that offers the most scope for expansion. The recruitment rates for Finnish nationals into the EU civil service are below what should be expected. Encouraging this recruitment is probably also a more cost-effective way of achieving the same end as secondments (where the MFA would go on paying the salaries), so it would seem an obvious choice for more support. On the other hand, this is not a new problem, or one just confined to the development cooperation sector. It is also an issue that has been brought up in other reports and evaluations. Resolving this dilemma therefore requires a serious effort and solid commitment.

Conclusion 5: There is a fairly high degree of variation in the way staff, in different parts of the MFA, perceive priorities in EU influencing. Based on the available plans and guidance not all find it that easy to prioritise both among the EU influencing strategies and objectives nor between them and their other duties.

Conclusion based on Finding 1.1

Finland's influencing plans/strategies have both strengths and weaknesses but, considering the increasing challenges in international development and inside the EU, the weaknesses are becoming more prominent. It is apparent that not all officials find it that easy to adapt the influencing plans to their particular circumstances nor prioritise within them or with their other tasks. Yet in times of limited resources in the Ministry and increasing global challenges, making clear choices is vital.

This is perhaps most apparent away from headquarters in Brussels or in embassies. As these offices pursue somewhat different outcomes and use varying different approaches, their influencing plans or priorities should also vary. In the case of embassies in particular the traditional role for Heads of Cooperation has been to administer Finnish bilateral ODA. Yet they are now also expected to engage proactively and regularly with the EU. How best to prioritise competing demands on their time is not always that easy.



Another example is for thematic experts at headquarters who need to combine both support to their own Finnish colleagues in Helsinki and abroad and participate in the relevant sectoral policy debates at the EU level and therefore need guidance on balancing the importance of various EU influencing priorities.

In a context of limited human resource budgets improving the focus of the use of precious staff time and making choices on priorities is essential and should be closely supported (SST-H1).

Conclusion 6: Finland has used the opportunities provided by regular EU processes, such as the 2019 EU Presidency, well to achieve significant outcomes. But some weaknesses on prioritisation and forward planning could jeopardise this good track record going forward.

Conclusion based on Findings 1.1, 1.5.2, 2.3 and 4.7

The prime example of this during the evaluation period was the Finnish Presidency of the EU in 2019 which went extremely well. But there are also other examples such as the negotiation of the NDICI regulation or the appointment of a Finnish politician as EU Commissioner for Development, Jutta Urpilainen, though was more difficult to use too explicitly. Finland is also exploring the new opportunity offered by TEIs and on the horizon there are possible openings in the Global Gateway.

Cooperation with Commissioner Urpilainen took some time to take off however, with the government apparently initially reticent to push their policies with her, perhaps out of a sense of propriety for the position. Over time this seems to have resolved itself with the MFA making better use of the opening it offers.

The EU Presidency was however a major success in development cooperation with Finland achieving many of the goals it set itself. It also did a lot to strengthen Finland's image as an efficient, professional and trusted actor in the development sector.

The wider point that emerges from both these examples however is Finland's constructive approach to playing the EU game seriously and on its own terms. In doing so it unambiguously favours the community approach to the EU rather than the intergovernmental one, consistent with Small State Theory (SST-H6).

Conclusion 7: The way the MFA is organised internally is clearly an important factor in its successful influencing of the EU that has helped enable a good list of outcomes, though there is also scope for improvements and a case for strengthening leadership in certain areas.

Conclusion based on Finding 1.3

Two assets stand out from the findings, the first is the relatively flat organisational structure of the Ministry and the space diplomats and sector experts are given to interpret their role. This seems to lead to more flexible approaches and constructive relationships in working with other EU actors. Second, internal government coordination on EU matters in Finland has a positive image and is seen as helping to ensure that Finnish delegates are consistent in their messages, though coordination on EU influencing in particular could be stronger.



At the same time both these assets have their limits and need to be kept under review and regularly fine-tuned. The first for instance does give rise to concern among some officials that there is a lack of clear leadership. Whereas for the second there are entities which feel less in the loop than others which may in turn lead to missed opportunities for influencing.

Conclusion 8: MFA knowledge management processes for influencing the EU on development cooperation are rather informal, with limited systematisation of monitoring and learning and poor links to forward planning.

Conclusion based on Findings 1.5.1 and 1.5.2

The rather ad-hoc approach to MEL and knowledge management on EU influencing contributes to difficulties in various areas including consensus building on priorities' internal coordination, solid forward planning, visioning and capacity building. There were also some indications that this may be resulting in missed and/or poorly followed through influencing opportunities. This is another area which Small State Theory highlights as important (SST-H2).

Conclusion 9: MFA staffing constraints place limits on EU influencing at all levels resulting in missed opportunities and constitutes a risk for influencing going forward.

Conclusion based on Findings 1.2.1 and 4.6

Tight human resource budgets place constraints on influencing. In these circumstances staff see the importance of good prioritisation, but some would benefit from more guidance on balancing influencing with other work and on prioritising among influencing tasks. As EU development cooperation becomes a growing concern for Finland its MFA officials have to increasingly balance bilateral work for Finland and the focus on the EU. This takes time and gives rise to competing priorities.

Equally it is important to take a dynamic and strategic approach to staff deployment for influencing, as was done to good effect during the Presidency, and indeed broaden the analysis to potential openings beyond the MFA.

Alternatives to just appointing more officials were thus also considered. It was noted that the numbers of Finns in the European civil service were below par, yet those who are there constitute a reservoir of goodwill and informal support for Finland as well as a knowledge pool of Finns that know first-hand how the EU works. The costs of Finns in the EU civil service are then of course also paid out of the EU budget.

Finland also uses fewer secondments of specialist experts to the European institutions than some EU MS who see this approach as one means of influencing. However, secondments are less attractive in budget terms as the costs then fall on the sending country.

The scope for other Finnish organisations with relevant expertise may also be encouraged and supported by the Ministry in different ways to send personnel to development programmes supported by Finland and the EU. Private sector consultants are already recruited for this type of role. Finnish Non-governmental organisations (NGOs) also send personnel overseas and institutes or centres of excellence may also be able to expand their contribution. All of these can add to the pool of Finnish expertise on EU development cooperation that can then help with influencing when required.



Conclusion 10: In places where internal coordination is not as strong as it should be, this creates risks particularly when new and potentially far-reaching opportunities arise (e.g., the TEIs and Global Gateway).

Conclusion based on Finding 1.4.1

The MFA does not yet seem clear about how to manage Finnish involvement in the TEIs, and even more so on how to approach the latest new Commission initiative, the Global Gateway strategy, nor adequately prepared to do so. This lack of clarity creates a risk of Finland losing out.

There is already a lot of time and enthusiasm being invested on the TEI approach and further down the road there is the prospect of involvement in the EU Global Gateway strategy, but there are also questions on overall coordination prioritisation and on the sustainability of Finland's involvement. While the very novelty of these initiatives means that an initial lack of clarity around how to handle them is not surprising, it is also true that the earlier clarity on management can be established the more Finland can get in at the start and carve out a good place for itself. As is often the case in the EU, being up to date on the latest initiatives and ready to react quickly is often half the battle to ensuring participation.

Both the TEIs and the Global Gateway are potentially important opportunities for Finland and its private sector, and in line with the MFA's priorities on encouraging Finnish business FDI, so it is important to follow them up promptly. There is also the fact that Finland has some familiarity with the concept of Team Europe and its objective to involve multiple actors contributing their respective expertise in different ways, as a result of using it at a national level with Team Finland. So potentially Finland should be able to adapt quickly and smoothly to the European level version (see also SST-H7).

Conclusion 11: External coordination and consultation in Finland on influencing EU development policy and cooperation is limited which undermines potential external support for Finnish influencing in EU external action.

Conclusion based on Finding 1.4.2

Poor external consultation does seem to be creating difficulties for mobilising external support for EU influencing from other stakeholders. The KPT and its constituent members from the Parliament, FINGO and the private sector can all act as allies for the MFA in EU influencing, providing they are informed. FINGO for instance has considerable influence with CONCORD in Brussels that in turn is listened to by the Commission and other MS Perm Reps (SST-H7).

5.2 Comparing conclusions: the EU with multilateral organisations

As already referred to this evaluation on Finnish influencing of EU development policy and cooperation comes shortly after a similar evaluation on influencing multilateral organisations. Given the similarities in the timing and scope of the two studies it is instructive to briefly compare their conclusions even though, as explained in section 2, the differences between the organisations also create different possibilities for influencing. The basic comparison is done in Table 2 below and this is then followed by some concluding comments.



Table 2 Comparing the Conclusions of this evaluation with those of the MO Evaluation

MO EVALUATION CONCLUSIONS	EU POLICY INFLUENCING EVALUATION CONCLUSIONS	COMPARISON
Effectiveness		
1. Finland is effective in influencing its multilateral partners.	1. The MFA's efforts to influence EU development cooperation policy have yielded worthwhile results. A range of significant outcomes have been achieved that constitute a successful achievement for a small MS of the EU. 2: Finland has succeeded in a coherent, efficient and relevant manner, to promote its own development policy priorities in the EU context though not all of them to the same extent.	Both evaluations reach very similar positive conclusions.
	3. Finland has made a good start on using EU funds to expand the ODA budgets it manages, but the foundations for increasing use of this EU delegated cooperation appear to be weak.	Finland using EU funds is not an issue in the MO context.
Channels		
3. Staff placements can be used more strategically and more effectively for multilateral influencing.	4. Finland has successfully used a variety of channels for influencing despite limited resources. In particular, it has made good use of working with coalitions of like-minded states in many though not all areas. On the other hand, the weak presence of Finnish nationals in the EU institutions is a clear handicap for influencing.	MO evaluation reaches no general conclusion on channels except for this one on staff placements. In the EU evaluation this issue is picked up in a recommendation (R4) with a similar message.
	6. Finland has used the opportunities provided by regular EU processes, such as the 2019 EU Presidency, well to achieve significant outcomes. But some weaknesses on prioritisation and forward planning could jeopardise this good track record going forward.	EU operates in a very specific way that is also different from the Mos – so there is no conclusion here in the MO context.
Staffing		
2. It is in the MFA's interest to secure adequate levels of human resources for multilateral influencing.	9. MFA staffing constraints place limits on EU influencing at all levels resulting in missed opportunities.	Similar conclusion on tight staffing budgets imposing constraints on influencing.
6. Staff rotations reduce influencing effectiveness.		



MO EVALUATION CONCLUSIONS	EU POLICY INFLUENCING EVALUATION CONCLUSIONS	COMPARISON
Prioritisation & Coordination		
4. Finland's approach to multilateral influencing covers both issue-driven influencing and general engagement of multilateral organisations, with at times unclear relative priorities.	5. There is a fairly high degree of variation in the way staff, in different parts of the MFA, perceive priorities in EU influencing. Based on the available plans and guidance not all find it that easy to prioritise both among the EU influencing strategies and objectives nor between them and their other duties.	Difficulties with the prioritisation of influencing objectives is picked up as an issue in both.
5. For multilateral influencing, there is no strong rationale for coordinating or aligning country-level and corporate-level influencing activities and objectives.		
<i>Internal coordination is only covered in the MO evaluation conclusions in terms of knowledge management (see below).</i>	7. The way the MFA is organised internally is clearly an important factor in its successful influencing of the EU that has helped enable a good list of outcomes, though there is also scope for improvements and a case for strengthening leadership in certain areas. 10. In places where internal coordination is not as strong as it should be, this creates risks particularly when new and potentially far-reaching opportunities arise (e.g., the TEIs and Global Gateway).	
<i>External coordination and consultation are not covered in the MO conclusions.</i>	11. External coordination and consultation in Finland on influencing EU development policy and cooperation is limited which undermines potential external support for Finnish influencing in EU external action.	
7. Country-level information and experience can represent useful input for corporate level influencing but is not always accessible.	<i>No formal conclusion is reached on this but examples of country-level information being of value at the corporate level are noted.</i>	
Knowledge management		
8. The MFA's approach to managing multilateral influencing with influencing plans and related processes has been effective for organisational learning and the MFA's reporting to parliament but has not significantly impacted how multilateral influencing is implemented in practice.	8. MFA knowledge management processes for influencing the EU on development cooperation are rather informal, with limited systematisation of monitoring and learning and poor links to forward planning.	The evaluations at first seem to reach opposite conclusions here on learning. On the other hand, both seem to agree that the practice of influencing and/or forward planning do not benefit from any learning that does take place.

Source: Evaluation team



Comparing the conclusions of this evaluation on influencing the EU with those of the previous evaluation on influencing multilateral organisations (Table 2) a few similarities stand out. First both evaluations are positive about the results achieved in each context. A second similarity is that both recommend increasing staff placements in the organisations in question. Equally, they both note that tight staffing budgets constrain the influencing – in both cases therefore it would seem that the potential for influencing further is not exhausted if human resources could be increased. Finally, both note some difficulties on the internal prioritisation of influencing tasks. Set alongside the previous common conclusion on staffing constraints, this is worth noting as it suggests that existing staffing could be used more effectively if prioritisation were simpler and clearer for staff.

There are also differences. First in the case of the EU the scope for Finland tapping into EU funding is noted, whereas this is not a possibility in the MO context. Second the EU decision making processes allow for specific forms of influencing that do not arise, at least in the same way, in the MO context. Third, the conclusions reached on knowledge management are different on the levels of learning from influencing practice in each, but both evaluations express concerns about the impact of the learning that takes place, as it does not seem to improve the influencing or forward planning.

5.3 Validating the theory of change

The methodology for his evaluation used the framework of a ToC which is represented graphically in Figure 6 in Annex 3. Looking back at this ToC on the basis of the findings that emerged, we can conclude that essentially it provided a very adequate representation of the causal chain involved in influencing the EU on development cooperation and policy. Thus:

- At the first level of **inputs**, the nine generic inputs listed in the diagram and grouped under the three headings strategy, resources and organisation all played a role. Worth noting is that the input ‘Adequate Human Resources’ did emerge in the findings with the comment that “*staffing constraints place limits on EU influencing*” (F1.2.1). Equally, in relation to the input ‘Relevant Finnish Institutions’, Finding 1.2.2 indicated that the limited number of Finnish institutions that have passed the EU pillar assessment may prove to be a constraint in the future.
- At the level of **activities** all the three featured in the ToC (building coalitions, participation in EU governance, proactive role in debates and processes) had a significant place in the analysis. This then confirms their role as important mechanisms to push influencing.
- At the level of **outputs**, five were listed in the diagram and again all of them were important in the causal change. One of them, that is ‘Finland seen as a trusted, professional and effective development actor’ emerged as one of the most important reasons for Finland’s success with influencing EU development policy and cooperation (F2.7.1 and 2.7.2).
- In terms of **immediate outcomes**, the evidence collected showed that Finnish influencing did impact on the trio people, policies and organisations, as represented in the diagram. Some very tangible evidence on the impact on policies was available (see Table 1) and many of the interviews, brought up the positive impact on people. Not surprisingly organisational impact was harder to demonstrate, but some of the policy outcomes (e.g., agreeing the NDICI-GE as a single instrument for all EU ODA) are of a nature that, if properly followed, are likely to produce long-term organisational change.



- Among the two **longer-term outcomes** listed in the diagram, the ‘Adjusted thematic approaches and priorities in EU’s development cooperation’ can be confidently predicted from the evidence collected, whereas it is harder to reach a conclusive judgement on whether ‘Increased operational efficiency’ will be a long-term outcome.
- Finally, in terms of movement towards the **high-level goals**, Figure 4 illustrates how the harvested outcomes identified contribute to the SDGs.

Thus overall, we can conclude the ToC diagram proved its worth in the evaluation and could therefore continue to be used in any internal discussions (e.g., information session, training, strategizing and forward planning) on influencing EU development cooperation.



6 Recommendations

Recommendation 1: The MFA should build on its evident successes in certain areas of influencing EU development cooperation (e.g., gender equality) to help improve its record in other areas (e.g., climate action and disability) where it has had less impact.

This recommendation is based on Conclusion C2.

It is addressed to the MFA leadership and Departments for Development Policy, for Europe and the other Regional Departments, as well as the Political and the International Trade Departments.

This recommendation is about building on strengths to help tackle weaknesses. This can be about looking at past practice in areas of success and learning lessons. For instance, using coalitions with EU like-minded states has worked well on issues such as gender equality and could be more extensively used in areas such as disability inclusion.

But it can also be about building out from the successful areas and seeing how they can add value elsewhere. Thus, by adopting a nexus approach to areas where gender equality and climate resilience intersect, the MFA could use its successful track record on gender equality as an entry point for work on climate change. There are significant opportunities in climate policy (both in mitigation and climate resilience) that could respond well to a transformational approach on gender equality. This would offer an opening for Finland to push particular impact-focused ideas in climate change from a base in gender equality policy where Finnish expertise is well known. Another potential nexus to explore further would be climate change and forests (and it is already emerging strongly in Finland's climate diplomacy) or again climate change and education.

Finland has supported the inclusion of a gender perspective in climate action since 2008 and done a lot of well-recognised work in relation to influencing on the intersection of gender equality and climate. While this is recognised in Finland's influencing goals, the process and outcomes on this nexus have been seen, not in an EU context, but mainly in other forums, such as in global climate funding boards and within multilateral organisations, where there are successful examples from the context of climate negotiations under the UNFCCC, of influencing the UN Agencies on gender equality in climate action and of providing funding for the approach (MFA 2022f, MFA 2022g, Palenberg et al., 2020).

In the area of climate resilience and disaster risk reduction, the integration of a gender perspective can bring significant improvements on impact, results and human rights. Women play a fundamental, yet undervalued, role in climate change mitigation. If policies and projects take into account women's particular roles, needs and contributions to climate action and support women's empowerment, there will be a greater possibility of limiting global warming to 1.5°C, in line with the international agreements (UNOCHA & UNDP, 2021).

Finland is already strong on gender equality and recognised for it in the EU. Gender intersects with climate issues and focusing on this nexus may be a good way for Finland to develop a specific



niche for itself in climate policy that can be complementary to what other EU MS and the Commission are doing. Climate policy is also a very broad field so the slow progress Finland has made on EU influencing on this cross-cutting objective may best be tackled by focusing down on a limited agenda such as the gender equality/climate nexus rather than trying to tackle the whole area at once. A similar approach could be adopted to education and climate, particularly as education is fundamental to changing attitudes on climate.

Recommendation 2: Finland, should expand the strategic use of EU delegated cooperation funding.

This recommendation on Conclusion C3.

It is addressed to the MFA leadership and Departments for Development Policy, for Europe and the other Regional Departments, as well as the Political and the International Trade Departments.

Finland's first experiences with EU delegated cooperation have gone well and there is enthusiasm to go further, however there is also an awareness that there are limits to how much more can realistically be done to the same high standard in this area without making some improvements in the arrangements the MFA has in place to manage this modality. It is therefore important to take a more strategic approach to increasing Finnish involvement in EU delegated cooperation.

The following actions may therefore be appropriate:

- Assess available capacity in the MFA to realistically manage an increase in EU delegated cooperation and identify potential bottlenecks (e.g., staff capacity, financial capacity, synchronising procedures with the EU, etc.)
- Assess what further Finnish organisations might become EU pillar assessed (to manage EU delegated cooperation) and engage in a dialogue with them to explore possibilities.
- Consider whether it would be appropriate to establish a Finnish implementation agency to take up EU contracts on the model of agencies in many EU MS.
- Consider having a Finnish organisation join the EU Practitioners Network to facilitate learning lessons from other EU MS agencies.
- Look at the scope of Finnish NGOs, institutes and centres of expertise to see how they might best be supported to improve their ability to send relevant experts on longer term contracts for EU funded projects or to EUDs.

Recommendation 3: Extend the use of coalition-building and working with like-minded states as a key channel for EU influencing and ensure MFA officials are appropriately trained to use this mechanism well.

This recommendation is based on Conclusion C4.

It is addressed to the MFA leadership and Departments for Development Policy, for Europe and the other Regional Departments including embassies, as well as the Political and the International Trade Departments.



While the evidence showed that Finland has used a variety of means to influence the EU it was also apparent that using coalitions of like-minded states was one of the most useful and commonly used practices. This also conforms with Small State Theory analysis of the behaviour of smaller EU MS. Finland already does this well and is indeed known for this in the EU. This is therefore a key practice and set of skills that experienced MFA officials need to pass on to new colleagues, both diplomats and thematic experts, that join the Ministry. Developing a training module internally may well be a good way to achieve this but equally structured learning on the job through short secondments to the Perm Rep in Brussels is likely to also be useful.

Recommendation 4: Expand the presence of Finnish nationals in the EU institutions dealing with development cooperation.

This recommendation is based on Conclusion C4.

It is addressed to the MFA leadership and Departments for Development Policy and for Europe, as well as the MFA Administrative Service (and the Prime Minister's Office).

Another key channel for exerting influence on EU development cooperation is through Finnish nationals that are familiar with what Finland stands for and can offer. There are various ways in which the presence of Finnish nationals can be increased in EU development cooperation (e.g., Junior Professional in Delegation positions, secondments, hiring of consultants). In particular, the experience of Sweden with expert secondments should be carefully considered.

If the MFA's human resources budget is the most important constraint, then consider supporting more Finnish nationals to successfully compete in the European Personnel Selection process and become EU civil servants. This is more of a long-term solution.

Looking further afield other Finnish organisations such as NGOs, research institutes or centres of excellence also provide Finnish personnel for development, and these can all be encouraged to also consider involvement in EU development cooperation.

Recommendation 5: Improve prioritisation of different objectives within EU influencing including by strengthening internal agreement on their relative importance in the MFA's strategy and operational work.

This recommendation is based on Conclusion C5 and 7.

It is addressed to the MFA leadership, the Department for Development Policy, the Department for Europe and other Regional Departments, the Political Department and the Department for International Trade.

This is partly an issue for staff in certain units who feel they would benefit from more guidance on the Ministry's EU influencing agenda and how they could prioritise this better in their work, but it seems likely that the issue may become more widespread. As the EU becomes more prominent in all of the MFA's work and all staff are expected to keep it in mind in their particular areas of responsibility, the need for solid, consistent and regular on-going guidance on how to integrate the MFA's EU priorities inevitably grows. Ultimately, for staff who have a lot on their plate, it also



comes down to questions of prioritisation and how best to focus. This then is a growing management issue where a strong internal consensus is needed among the different levels of management. The consensus then needs to be regularly communicated and discussed with all staff in team meetings and other appropriate fora.

Guidance, is of course, already provided, but evidence suggests that for many staff this could be taken further. For instance, EU influencing priorities (based on the overall influencing plans) and how to achieve them could be made more explicit in the guidelines and templates for thematic sector specialists.

Recommendation 6: In particular, differentiate more clearly between the needs of EU influencing in Brussels and in embassies and improve clarity on prioritisation in partner-country settings.

This recommendation is based on Conclusion C7.

It is addressed to the MFA leadership, the Department for Development Policy, the Department for Europe and other Regional Departments, the Political Department and the Department for International Trade.

This recommendation covers a particular aspect of the previous one in that embassy staff clearly have very specific roles and operate in a context where EU Delegations and the embassies of other EU MS are very present. This EU group can also vary tremendously in size from just a couple of MS to more than a dozen. Embassy staff are therefore faced with issues of EU coordination and influencing on a daily basis in addition to having to run their own bilateral programmes.

Increasingly it also seems that as decision making is decentralised and with the advent Team Europe approaches at the partners country or regional level, a growing proportion of EU influencing on development cooperation will be conducted at partner country level.

In these circumstances it seems clear that embassy staff require well-tuned guidance on the Ministry's EU influencing agenda and how they could prioritise this better in their work. As above with the previous recommendation, as the EU becomes more prominent in all of the MFA's work and all staff are expected to keep it in mind in their particular areas of responsibility, the need for solid, consistent and regular on-going guidance on how to integrate the MFA's EU priorities inevitably grows. Ultimately, for staff who have a lot on their plate, it also comes down to questions of prioritisation and how best to focus. As also indicated above this is a growing management issue where a strong internal consensus needs to be maintained between head office and embassies.

Guidance, is of course, already provided, but evidence suggests that for many staff this could be taken further. For instance, EU influencing priorities (based on the overall influencing plans) and how to achieve them could be made more explicit in the guidelines and templates for embassies.



Recommendation 7: Develop more forward looking and medium-term influencing strategies that link to EU development cooperation agendas and calendar cycles and, looking further ahead, seek to identify potential new opportunities coming up on the EU agenda that Finland might be well placed to help tackle.

This recommendation is based on Conclusion C6.

It is addressed to the Department for Development Policy and the Department for Europe.

A key element of Finland's successful influencing over the past period has been its willingness to use the opportunities that the EU system has thrown up. Examples of this have included the EU Presidency, the appointment of a Finnish Commissioner for development cooperation, the possibility to establish a gender transformative approach expert group and the EU's opening to delegated cooperation. More recently, MFA staff are actively exploring Finnish involvement in TEIs and on the horizon, there is prospective EU Global Gateway.

Based on the value of this experience of using opportunities in the EU system it is important to look ahead and consider what other ones might emerge in the medium term. The EU administration operates in cycles so it is relatively straightforward to see many of the opportunities that will come up in the next few years. Finland will not get another Presidency for quite some years, but various like-minded states such as Sweden (2023), Belgium (2024), Denmark (2025) and Ireland (2026) will all have their turn and will no doubt be open to joint action in the areas of some of Finland's policy priorities. The MFF runs in longer 7-year cycles, but by the mid-term of the current MFF (201-2027) a debate preparing the next MFF will open up, which, in all likelihood, also involves a discussion on the implementation of the NDICI single instrument format. All these opportunities for influencing can therefore be prepared well in advance.

Finland's chairing of the NDICI negotiations during the Presidency threw up evidence that Finland was respected by two often very different groups of MS: (a) the development cooperation specialists such as Sweden, Denmark, Germany and France and (b) those with an interest in neighbourhood policy who saw in Finland a country who had experience of dealing with Russia and which therefore also had a good feel for Europe's East-West relations. With the crisis provoked by the Russian invasions of Ukraine this latter appreciation will become increasingly important for the EU. Rebuilding Ukraine after the war will, for instance, be a major task Finland is well placed to contribute towards. Both cross-border relations with Russia and indeed Arctic cooperation are therefore likely to create various opportunities for Finnish involvement and leadership in EU affairs. While this is not strictly development cooperation in the traditional North-South sense, it is a field where Finnish cross-cutting objectives and many of its development policy priorities remain valid and can be put into practice.

Recommendation 8: Consider urgently how the end of the term of the von der Leyen Commission and the start of a new one, might be best used as an opportunity to consolidate Finnish influencing on EU development cooperation from the past few years, as well as prepare the ground for working with the new Commissioner for DG INTPA.

This recommendation is based on Conclusion C6.

It is addressed to the Department for Development Policy and the Department for Europe.



An immediate example of an opportunity that can be used to push Finnish priorities on development cooperation is the end of Commissioner Urpilainen's term in charge of DG INTPA. In particular, the MFA leadership could first of all, engage with the Commissioner Cabinet to discuss what the legacy of her tenure could be and then, to the extent that these are in line with Finland's influencing priorities, work with her team to help them concretise results to this end. Education is the most obvious area in which it would be good to consolidate the legacy of this term, but there may also be other areas. Second, the MFA should start preparing what it wishes to see as the priorities for DG INTPA in the next Commission from 2024 and use the expertise gained by Commissioner Urpilainen and her Cabinet to see how these might best be carried forward as soon as the new Commissioner has been appointed.

Recommendation 9: Clarify and communicate regularly on roles and responsibilities and ensure consistent leadership on EU influencing among the senior MFA management.

This recommendation is based on Conclusion C7.

It is addressed to the MFA leadership.

This recommendation is based on the conclusion that strengthening leadership on EU influencing is one key area where the MFA's internal organisation could be improved. This is essential because the EU is becoming such a prominent presence in all aspects of the MFA's work (including in partner countries) that it is important that the whole organisation pulls in the same direction on this. This therefore requires strong, unified and visionary leadership at all levels of the Ministry, something that was not always in evidence during the research.

Recommendation 10: Establish an organised feedback- and learning-cycle to help support strategizing on EU influencing.

This recommendation is based on Conclusion C8.

It is addressed to the MFA leadership, the Department for Development Policy the Department for Europe and the Evaluation Unit (EVA-11).

Current MEL practices in the MFA appear as largely ad-hoc and piecemeal with a high reliance on personal knowledge that does not always seem to be systematically passed on when post holders change. Good personal discipline among officials can, and often does, overcome problems but not all staff will behave in the same way, and this makes the organisation vulnerable to moments of loss in expertise and corporate memory and weakens the foundations for evidence-based forward strategizing. Steps should therefore be taken to strengthen (and in certain places also create new aspects of) a regular cycle of feedback, learning and forward planning based on lessons learnt. This should also include periodic outcome driven assessment at regular intervals.

Also include in this more multistakeholder consultation (e.g., with the Parliament and other actors) on Finland's EU development cooperation influencing plans and how these might best be supported by such other actors. External stakeholders can be a valuable resource in terms of knowledge and long-term experience and should be brought in where possible. If kept well-informed they can



also become allies in influencing at the EU level. This therefore requires more multistakeholder consultation and regular communication on Finland's influencing plans.

Recommendation 11: Take a more strategic and proactive approach to MFA staffing for influencing on EU development cooperation that combines both the needs of the prioritisation of the work and the scope for staff deployment within the limits set by budgets.

This recommendation is based on Conclusion C9.

It is addressed to the MFA leadership and Departments for Development Policy, for Europe and the other Regional Departments including embassies, as well as the Political and the International Trade Departments.

In the context of limited human resource budgets, the MFA needs to take a holistic approach to both helping staff maximise the use of their time with more guidance on the prioritisation of influencing work (as above) and by increasing staff deployment in strategic positions for influencing both within the MFA and the EU.

Increasing the number of Finns in EU development cooperation can be done by different routes. This should include encouraging Finnish appointments to the EU civil service where costs are then paid out of the EU budget. There should also be scope to support other Finnish organisations with relevant development expertise to send personnel overseas. There may of course be obstacles to this, but finance is not necessarily one of them if EU development cooperation funds are involved. Other administrative or legal issues to do with the original orientations of individual organisations, may also limit their ability to send development personnel abroad to EU development cooperation projects. For the MFA to have a good understanding of any such constraints that may exist would be a useful first step forward.

Recommendation 12: Review whether the MFA is adequately set up to coordinate and participate in TEIs and the EU's new Global Gateway and develop a clear strategy to do so as required.

This recommendation is based on Conclusion C10.

It is addressed to the Department for Development Policy.

There is considerable enthusiasm on Finland joining in on relevant TEIs in Helsinki and Brussels but also in embassies. Embassy staff are also being pushed by EU Delegations to join in and ensure Finnish participation. The same is likely to happen down the line with the Commission's even newer Global Gateway initiative. While the opportunities look positive there is clearly also a lot of work involved and some officials are questioning how best to keep this burgeoning field manageable. So far there also seems to be a lack of clarity in the Ministry as to a focal point for coordinating Finnish involvement in these initiatives and there is thus a danger that mistakes will be made and the pressures on certain staff will become excessive leading to potentially reduced uptake of relevant opportunities. Equally, careful consideration should be given as to whether



the needs of Finnish actors such as the private sector to get involved in these EU initiatives are adequately catered for.

Recommendation 13: Take steps to improve the transparency, accountability and external communication on EU influencing so as to encourage wider stakeholder support for influencing on EU development policy and cooperation.

This recommendation is based on Conclusion C11.

It is addressed to the Department for Development Policy.

The key step for the Ministry to take on this recommendation is to regularly communicate with and consult the KPT on its EU influencing plans, seek its inputs and keep the committee updated on progress. By virtue of the KPT's membership this would automatically involve four key constituencies that can both help inform the influencing plans and support the MFA in their implementation. That is the Parliament, the private sector, the Finnish NGO sector and the trade union movement in Finland. Not only would this improve transparency and accountability to key constituencies, but it would also help secure support for Finnish influencing in EU development cooperation.

These constituencies take an active interest in Finnish, but also EU, development cooperation. All four of them also have linkages through to European level equivalent bodies that in turn are regularly in touch with and represent their views to the EU institutions and particularly the Commission and the Perm Reps of other MS. They can therefore help ensure that Finnish points of view are well communicated and taken more fully into account in Brussels, providing of course, that a consensus on influencing priorities can first be built between them and the MFA in Helsinki. Building such a broad-based political consensus as a platform to support Finnish EU influencing efforts is also consistent with Small State Theory (SST-H7).



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8 Annexes

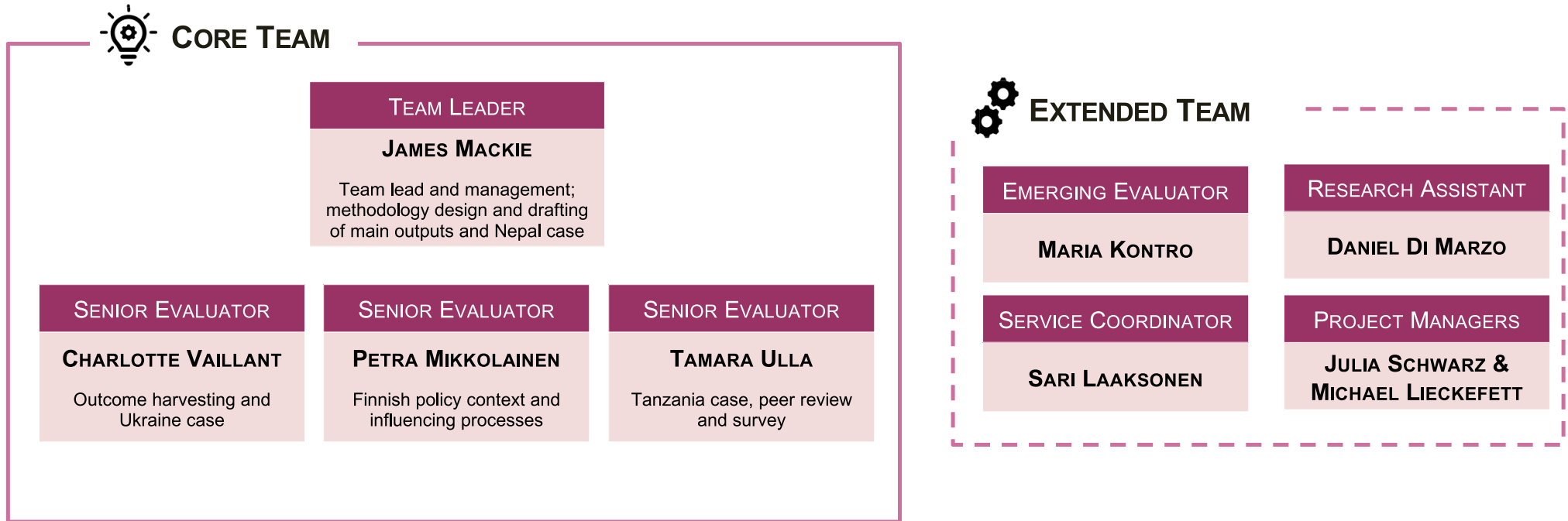
Annex 1: The Evaluation Team

The evaluation was conducted by a four-person international team, supported by an emerging evaluator and a research assistant. Particip/NIRAS also supported the exercise through ongoing technical support and quality assurance. Figure 5 shows the overall team structure, composition; and lines of responsibility. Key roles and responsibilities were as follows:

WHO	RESPONSIBILITIES
Team Lead James Mackie	Overall team lead and management; methodology design; drafting of main outputs; EU HQ level analysis and the Nepal case study.
Senior Evaluator Charlotte Vaillant	Supporting methodology design and drafting of main outputs; outcome harvesting, peer review and Ukraine case study.
Senior Evaluator Petra Mikkolainen	Analysis of Finnish policy context; supporting methodology design and drafting of main outputs; MFA influencing processes and influencing activities.
Senior Evaluator Tamara Ulla	Supporting methodology design and drafting of main outputs; Tanzania case study, peer review and survey.
Emerging Evaluator Maria Kontro	Supporting data analysis; supporting drafting of main outputs and Nepal case study.
Research assistant Daniel Di Marzo	Supporting data collection and analysis, peer review and survey.
Former Team Lead Jörn Dosch	Contributions to methodology design.
Service coordinator Sari Laaksonen	Overall management and quality assurance.
Project managers Julia Schwarz and Michael Lieckefett	Overall management and quality assurance.



Figure 5 Evaluation team structure and composition





Annex 2: Terms of Reference

1. Background

The European Union (EU) and its Member States are the world's largest donors of development and humanitarian assistance. Finland continues to exert influence on EU development policy and EU institutions in line with its development policy priorities. Development policy is an integral part of the EU's external relations and the EU's role as a global actor.

In 2019, the EU and its Member States invested EUR 75.2 billion (EU share €13.2 billion) in official development assistance, which covers more than half (55.2%) of total global assistance. During the same year, the EU's ODA funding helped improve the lives of millions of people in over 120 countries around the world and its humanitarian assistance provided relief to millions of people in more than 80 countries.¹⁴³

The EU and each of its Member States practice their development cooperation and development policies which complement and support the development cooperation carried out by the EU. The Member States, including Finland, jointly agree on the common practices and principles that give guidance to the implementation of development policy in all EU Member States. The European Commission's Directorate- General for International Partnerships and the European External Action Service (EEAS) are responsible for the formulation of European development policy and for delivering aid.

EU's development funding is allocated through several funding modalities. Grants are direct financial contributions provided to organisations or projects carried out by them. Contracts are awarded through tendering procedures to purchase services, supplies or works. Budget support aims at financing partner countries' development strategies and/or strengthening specific systems through sector budget support. It consists of financial transfers to the national treasuries and involves policy dialogue and measures to assess the use made of these funds. To benefit from budget support, a beneficiary country must demonstrate commitment to the fundamental values of human rights, democracy and the rule of law. In recent years, blending modalities for achieving EU external policy objectives, complementary to other aid modalities and pursuing the relevant regional, national and overarching policy priorities, have increased. Blending is the combination of EU grants with loans or equity from public and private financiers.

Between 2014-2020, EU funding delivered aid mainly from two different sources:

- European Development Fund (EDF): € 30.5 billion to African, Caribbean and Pacific countries
- Development Cooperation Instrument (DCI): € 19.6 billion (within EU budget)

43 2020 Annual report on the implementation of the European Union's instruments for financing external actions in 2019. European Commission.



The new multi-annual financing framework was negotiated for 2021-2027. A new all-encompassing funding instrument for external action was established: Neighbourhood, Development and International Cooperation Instrument (NDICI)⁴⁴.

Finland contributes to EU-level action having a wider impact on developing countries. For instance, EU decisions and agreements in fields such as taxation, trade and agriculture carry major immediate or indirect consequences for developing countries. Participating in the EU development policy and its decision-making provides Finland greater opportunities than its size would suggest, shaping the future of international development policy. At the same time, it is part of Finland's multilateral cooperation. As an example, Finland attends international negotiations as part of the EU. By influencing EU programming at the country level, Finland can potentially influence large and significant thematic areas and interventions. Cooperation with EU delegations is a major part of this.

For Finland, some of the potential added value of allocating development funding through the EU include:

- With delegations in 150 countries, Finland can reach countries where it does not have a presence of its own.
- EU finances large programmes and focuses on a limited number of sectors per country, thus decreasing fragmentation.
- Joint programmes and projects between the EU and Finland enable additional contributions by the EU.
- EU applies funding modalities that are not used by all Member States in their respective bilateral cooperation programmes, such as budget support (as in the case of Finland).
- EU and the Member States have a strong common voice as the biggest development donor in the world.
- Cooperation and joint programming at the country level provide synergies and opportunities for avoiding overlapping and fragmentation. Furthermore, it enables a joint forum for information sharing, joint analyses and actions.
- EU development funding supports the promotion of the EU's values and trade interests globally.
- Finland can further advance its development cooperation priorities; strengthening the status and rights of women and girls (GAP III), strengthening the economic base of developing countries and creating jobs, education, well-functioning societies and democracy, climate change and natural resources.

Finland seeks to play a role at different levels of EU's decision-making, to bring questions regarded important by Finland to the fore in the EU's development policy:

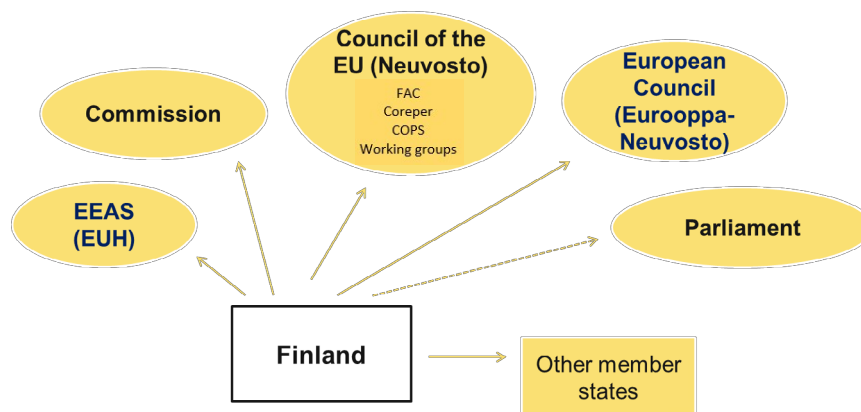
- Finland's Minister for Development Cooperation and Foreign Trade attends the Foreign Affairs
- Council (FAC) when it meets to make decisions in the EU Development Ministers configuration.

44 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R0947>



- As for the preparation of decisions adopted in the Council of Ministers, Finland participates in working parties meeting at the senior official level (including the Working Party on Development Cooperation (CODEV) and the ACP Working Party, which concentrates on cooperation with the African, Caribbean and Pacific countries). The CODEV working party has had a new name and mandate since July 2021 taking into account the new multiannual financial framework of the EU: CODEV-PI/ Working Party on Development Cooperation and International Partnerships.
- Finland is involved in the implementation and monitoring of development cooperation projects and programmes by working in the committees responsible for the financing instruments.
- Finland's missions in different countries participate in the coordination of the EU's development cooperation and consultations and expert-level meetings with the EU Delegations related to e.g., the EU's country strategies.

Furthermore, Finland seeks to advance Finnish expertise and secondments in the EU.



Source: KEO-10/POL-30, Training on EU influencing, 2018

Finland supports the strengthening of the EU's role as an international political player that acts with one voice in international organisations and contractual negotiations. The EU, on its part, is engaged in political dialogue with third parties, under the leadership of the High Representative, aiming to strengthen its international profile and to play a role in international politics in line with its objectives.

2. Purpose and Rationale

In line with the evaluation plan 2021-2023, the Unit for Development Evaluation of the Ministry for Foreign Affairs of Finland commissions a strategic evaluation to assess Finland's development policy influencing in the EU.

Finland is a committed supporter of the European development policy and cooperation. The EU is a significant channel for Finland's development cooperation. Finns have held several significant roles and positions in the joint European development arena in the recent past (e.g., EU Presidency in 2019; Jutta Urpilainen Commissioner, International Partnerships 2019-2024).



Finland's influencing activities towards multilateral organizations were evaluated in 2019-2020. However, the development policy influencing activities concerning the EU have not yet been evaluated at the strategic level. This evaluation will contribute to wider lessons learnt on the Ministry's development policy influencing activities overall, based on these two evaluations.

The New European Consensus for Development, adopted in 2017, is a major leading policy guideline for the EU Development Policy and falls within the period of this evaluation. Also, the timing of this evaluation after Finland's EU Presidency will enable assessing influencing during that period. The evaluation will also take into account the recent processes and developments that led to the development of the NDICI (Neighbourhood, Development and International Cooperation Instrument) and the development cooperation objectives. Therefore, this evaluation will inform the Ministry on how to engage with the EU during the new NDICI era in the most influential ways. It is against this rationale that the evaluation is commissioned.

The purpose of this evaluation is to assess the relevance, effectiveness and coherence of the different development policy influencing activities by the Ministry concerning the EU and its institutions, and to provide guidance to the Ministry on further strengthening of the influencing activities for the future.

The evaluation is mostly forward-looking (formative) and utilization-focused, providing strategic information to inform future developments of the influencing agenda and practices as well as actionable recommendations.

The objectives of this evaluation are:

- To assess how Finland has managed to promote Agenda2030, Building Back Better (and Greener), and Finland's Development Policy objectives in the EU, as well as the common development cooperation practices and principles by the Member States.
- To assess the effectiveness of various influencing activities, including influencing outcomes, means and channels and Finland's best opportunities to influence the EU (institutions and bodies, country delegations, interventions etc.) taking into account available human and financial resources.
- To analyse the factors (structures, processes, tools, capacity, other) that have facilitated/ enabled or hindered the positive results of the influencing activities towards the EU.
- To provide insight on the best opportunities and ways to engage and influence in the future, especially under the new EU funding instrument and the evolving development cooperation scene.
- To provide insight on how the Ministry together with other relevant stakeholders could develop their practices to maximize influencing the EU for the future, taking into account available human and financial resources.

3. Scope

The evaluation will mainly focus on the period of 2014-2021. This covers the period of the EU's fifth multiannual financial framework (MFFs) and multi-annual indicative programme (MIP) of 2014-2020, including the adoption of the European Consensus on Development (2017) reflecting the SDGs, and the negotiations leading towards the new Development and International Cooperation



Instrument (NDICI) 2021-2027; the funding cuts of the Finnish development cooperation budget in 2015; and Finland's EU Presidency in 2019.

More recent (post-2020) developments will be taken into consideration whenever deemed useful and necessary to allow for at least a preliminary evaluation of Finnish development policy influencing during the current 2021-2027 funding period which is characterised by some changes compared to the previous multi-annual financing framework. These changes include but are not limited to the reform of DG DEVCO, which is now called DG INTPA and is the principal EU stakeholder regarding the design, management and implementation of the Union's development cooperation. Including the most recent developments allows making preliminary findings regarding the extent to which new institutional set-ups, such as the NDICI (Neighbourhood, Development and International Cooperation Instrument), have affected Finland's influence positively or negatively. Finland's influence of supporting the European Neighbourhood Policy (ENP) reforms is included in the evaluation. This evaluation will inform the Ministry on how to engage with the EU during the new NDICI era in the most influential ways.

The evaluation is to cover all levels of engagement in the Ministry and its work with the EU, ranging from the various positions in Helsinki to the embassies and delegations in Brussels and partner countries. The methods and principles used by Finland to influence EU development policy in a broad sense will be evaluated with regard to all fields of cooperation under the administration of the Ministry for Foreign Affairs. The practices used by Finland to engage in EU decision-making will be assessed. Equally, the processes and developments that have led to the new financing instruments and programming, Finland's engagement and contributions therein as well as abilities to promote and secure its interests, will be assessed.

Humanitarian assistance will be excluded from the scope of this evaluation.

4. Evaluation Questions

The preliminary evaluation questions and issues to be assessed are:

1. To what extent has the Ministry succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU? (Effectiveness, Relevance, Coherence of influencing)
 - b. At the various levels of engagement (Brussels, partner countries; policies, joint programming; etc.)
 - c. During the different terms of Presidency, including Finland's term of Presidency.
 - d. Through the different channels (formal and informal; funding channels; Finland alone/as part of the EU/ as part of the like-minded country groups or networks; etc.)
 - e. In the various policy priority areas or themes set out in Finland's policies, plans and guidelines.
2. To what extent has the Ministry been able to influence the EU for the advancement of the Finnish and international development agenda and interests, and why? (Effectiveness of influencing)



- a. What have been the most prominent influencing results achieved/contributed to by Finland as a key actor?
 - b. How visible has Finland been and have its key messages and positions been understood?
 - c. What have been the strengths, weaknesses, best practices and challenges of the Finnish influencing approach in terms of effectiveness?
 - d. What have been the enabling or hindering factors in effective influencing towards the EU?
 - e. What have been the missed opportunities (backward) or (unused) potential (forward), if any, in influencing the EU?
3. To what extent have the management arrangements, processes and tools been effective in maximising the influence and coordination from the point of view of development policy and cooperation? (Management, coherence of influencing)
- d. within the Ministry, including the embassies and permanent representations
 - e. within the government of Finland and towards the Parliament
 - f. with other EU countries at international and country levels

Based on the evidence and joint analyses, the evaluation team will present findings and overall answers to the evaluation questions in a clear and concise manner. Furthermore, the evaluation shall draw well-justified conclusions and make strategic and practical recommendations for the ministry on how it can further enhance its EU policy influencing activities and their effectiveness, relevance, coherence and management. Beyond the EU, the evaluation is also expected to present wider lessons learnt on the best ways for Finland to carry out policy influencing and suggestions how to further develop them, based on the evidence from this evaluation and the 2019 one on influencing multilateral organizations.

The main users of the evaluation are the Ministry's leadership, departments and representations in charge of design and implementation of development cooperation and EU development relations and negotiations, as well as the Finnish agencies involved in the implementation of EU funded development cooperation programmes. Other relevant users are the government of Finland actors engaged with EU coordination and relations, the Parliament (especially Foreign Affairs Committee), and the Development Policy Committee.

5. Approach and Methodology

The evaluation will be

- results-based: analysing the actions of the involved stakeholders (which will be mapped during the inception phase) and the degree of result achievement in influencing;
- outcome-oriented: analysing the perceived outcomes among stakeholder groups;
- process-oriented: analysing the kind of processes that were initiated and followed to achieve outcomes; and
- evidence-based: utilising a mixed-methods approach combining quantitative and qualitative data collection and analysis.



- The three dimensions that need to be taken into consideration for the analysis of influencing are:
- Channel - Institutional versus personal influence: the extent to which influence exerted through (and due to) institutional settings and arrangements (e.g., decision-making procedures within the EU) and personal initiatives/actions (e.g., the role of individual officials and diplomats)
- Approach – Formal versus informal influence: the extent to which influence is exerted through formal means of interaction (e.g., negotiations) and informal means of interaction (communication outside official negotiations, diplomatic relations, etc.)?
- Level – Macro versus micro: the extent to which influence is exerted at the policy and strategic level on the one hand and at the level of implementation at the other

These dimensions will be considered in the process of gathering evidence in addressing the Evaluation Questions (EQs). The EQs proposed above will serve as the basis to develop a full evaluation matrix during the inception phase.

During the desk phase, an extensive documentary review will be carried out covering Finnish and EU policy (incl. policy/influencing objectives and positions of both, strategy and programming documents, guidelines, internal reporting, reviews, evaluation reports, other reports, emails (to the extent possible) as well as previous evaluations and reports on influencing.

In the documentary review, special emphasis will be placed on collecting information on the institutional contexts (incl. in relation to structures, organisational culture, external political/policy environment, positions by other member states and like-minded actors) to allow contextualising the findings emerging from the exploration of the various sources. In addition to contextual factors, temporal factors are reflected in the analyses, to take into account shifts in policy priorities if any.

Both quantitative and qualitative data will be gathered. The quantitative approach will not be restricted to a presentation of figures on Finland's contribution to EU financing instruments, thematic budget lines, programmes, organisations units etc., but also elaborate graphs and figures showing the mentioning of Finland and Finnish activities related to, or indicative of influencing in key EU reports and documents. For this purpose, special emphasis will be put on a systematic software-based analysis of all independent evaluations of the EU's country- and regional-level as well as thematic development cooperation since 2014.

In addition to documentary research, an e-survey of relevant stakeholders will be launched, followed by or in parallel with in-depth interviews. Survey and interviews address the same stakeholder groups: officials of MFA and other relevant government agencies, Finnish officials at the European Commission (particularly INTPA), Finnish diplomats at the EEAS, Finnish members of the European Parliament's Committee on Development (DEVE), other relevant stakeholders involved in the conduct of Finland-EU relations with regards to development policy, and officials from other EU MS in the respective institutions. It would be useful to conduct the survey first and triangulate and deepen findings through interviews. However, due to time constraints, it might be necessary to do the survey and interviews in parallel.

During the field phase, consultations with Finnish Embassies, EU Delegations, MS Embassies, and selected national government stakeholders and potentially key beneficiaries will be conducted in a small number of case study countries. The ideal approach – to be discussed further – would be to select three countries based on the following criteria:



- a country which is a recipient of both sizable EU and Finnish ODA and where a large number of EU MS is present (including Finland);
- a country which is a recipient of both EU and Finnish ODA and where Finland is one of only a small number of MS present;
- a country that is a recipient of EU but not Finnish ODA and where Finland is present.

Such a sample would allow for the evaluation of Finnish influencing under different framework conditions. However, two country case studies would also be an option as long as they reflect contrasting situations.

The information gathered during the field phase will be crucial to assess the effects of Finnish influencing and will serve four main purposes: i) triangulating information stemming from other methods/tools; ii) confirming the findings emerging from the desk phase, including comparing with results from the evaluation on influencing multilaterals; iii) enriching the evidence base, and iv) identifying “human- interest stories” to illustrate the extent and effects of Finnish influencing. The evaluation team will seek to gather some direct quotes, with the informed consent of the informants.

The synthesis phase is devoted to joint analyses and reporting, finalising the answers to the EQs and formulating conclusions and recommendations based on the quantitative and qualitative data collected and findings identified throughout the process.

For the desk and final reports, a common template will be used to gather and structure findings from documents, the survey and interviews to establish a robust, comprehensive and transparent evidence base. As a general rule, the data and findings of the online survey as well as information and data extracted from all other sources will be disaggregated to the extent possible to show differences between stakeholder groups in line with the evaluation requirements of individual indicators (and EQs).

The detailed evaluation questions and the methodology to best support the achievement of the evaluation purpose and objectives will be defined in cooperation between EVA-11, the reference group, the EMS Coordinator and the Team Leader. It is foreseen that the approach, scope and possible sampling will be established on basis of further consultations, the review of existing documentation and discussions among the named parties.

Some of the limitations related to the availability of data and information include the rotation and challenges of the availability of staff concerning the earlier years of the temporal scope. The documentation related to the topic is mostly based on memos and internal briefs, practically all of which are in Finnish. The English materials available are online on EC websites, such as the annual report.⁴⁵

It is foreseen that data and information is needed to be collected at the partner country level. The selection of country cases will be discussed and finalised in the inception report.

Issues of bias must be addressed and minimised in the design and execution of the evaluation methodology, given the foreseen inclination towards positive bias by informants.

45 https://ec.europa.eu/international-partnerships/news/2020-annual-report-implementation-eus-external-action-instruments-2019_da



Evaluation criteria covered by this evaluation are 'relevance', 'effectiveness' and 'coherence'. In addition, further questions to do with planning and implementation are included under the heading of 'management', although some may also appear under the coherence criterion.

6. Evaluation process, timelines and deliverables

The evaluation will take place during 2021/2022. It began in June-August 2021 by conducting initial consultations within the ministry for drafting a concept note, nominating the reference group and launching the process for identifying Team Leader candidates. The evaluation follows the general phasing of the Evaluation Management Services (EMS) framework used by the Development Evaluation Unit (EVA-11). The timetable below is tentative, except for the final report.

Phase A: Planning phase: September 2021 (SO1)

- Preparation of the draft Terms of Reference: 15 October 2021
- Circulation for feedback from the Reference Group (RG): DL 27 October 2021
- Finalisation of the ToR and submission for approval: 29 October 2021

Phase B: Start-up phase: November 2021 (SO2)

- Recruitment of the team members
- Kick-off meeting by ET, RG and EVA (online), 12 November 2021

Phase C: Inception phase: November 2021

- Submission of Draft Inception Report, 4th week of November 2021
- Inception meeting (incl. interviews), 4th week of November 2021 (online)
- Final Inception Report, First week of December 2021

Phase D: Implementation phase: December – February 2022

- Desk review and conduct of consultations virtually and in Finland, December – January 2022
- Two country case studies, January – February 2022
- EU/Brussels case study, January – February 2022

Phase E: Reporting/Dissemination Phase: February – September 2022

- Analysis and joint report writing by ET February – April 2022
- Internal sense-making and analysis workshop (2 d), ET: first week of April 2022
- Findings, Conclusion, and Recommendations (FCR) Workshop (ET, RG, EVA): First week of April 2022
- Joint writing/harmonization workshop (1d), ET:
- Draft Final Report submission, 1st week of June 2022



- Meeting on Draft Final Report (and commenting), 3rd week of June 2022
- Final Report, last week of August 2022
- Public Presentations, last week of September 2022.

The language of all produced reports and possible other documents is English. The timetables are tentative, except for the final reports.

A. Planning Phase: The Team Leader will submit the draft ToR in liaison with the Evaluation Manager and the EMS Service Coordinator.

B. Start-up Phase: Presentation of the approach and methodology by the Team Leader.

C. Inception phase: The inception phase will include an evaluation of the availability and accessibility of strategic documentation and communication. This will provide the basis for a comprehensive desk review during the implementation phase. The (draft and final) inception report will include the evaluation plan and initial desk study. The inception report will include the following sections: background and context; initial desk study findings (strategic level only), further development of the analytical framework; finalization of the methodology and summarised in an evaluation matrix including evaluation questions/sub-questions, judgment criteria, methods for data collection and analysis (the evaluation matrix will reflect and address relevant gender and cross-cutting perspectives); final work plan and division of work between team members; tentative table of contents of the final report; possible data gaps; tentative implementation plan for stakeholder consultations with a clear division of work (participation, interview questions/guides/checklists, preliminary list of stakeholders and organizations to be contacted); communication and dissemination plan; analysis of risks and limitations and their mitigation; and budget. The structure of the evaluation report and annexes or additional volumes will be agreed upon in the Inception meeting.

D. Implementation phase: At the end of the implementation phase, a Preliminary Findings Workshop will be conducted in Helsinki with key stakeholders to validate and align with the utilisation-focused approach of the evaluation.

E. Reporting and dissemination phase: Final report (draft final and final versions) and the methodological note will be reviewed by the quality assurance expert. Production of the first draft of the 4-pager for communication purposes will be the responsibility of the Team Leader/Evaluation Team. The first draft will be provided simultaneously with the first draft of the final report.

The final report will include an abstract and summary (including table on main findings, conclusions, and recommendations) in Finnish, Swedish, and English. The final report will be delivered in Word format (Microsoft Word 2010) with all the tables and pictures also separately in their original formats. The revised reports have to be accompanied by a table of received comments and responses to them. In addition, the MFA requires access to the evaluation team's tools, data sets, or interim evidence documents, e.g., completed matrices, although it is not expected that these should be of publishable quality. The MFA treats these documents as confidential if needed.

Each deliverable is subject to specific approval. The evaluation team can move to the next phase only after receiving a written statement of acceptance by the MFA.



In addition to written deliverables, the Team Leader and the evaluation team are expected to participate in workshops and give oral presentations, often supported by PowerPoint slides (esp. during phases D and E). Should the COVID-19 situation allow, the public presentation of evaluation results will be held in Helsinki, with evaluation team members present. In addition, the Team Leader and other team members will give a short presentation of the findings in a public Webinar. This presentation can be delivered from distance. In the event of continued travel restrictions, these two presentation events may be combined.

The Consultant is expected to provide agreed visual materials, such as a minimum of 3 alternatives for the cover picture for EVA-11's acceptance.

The inception phase is expected to include a review of the existing documentation, further consultations and possibly some initial collection of primary data, to support the final definition of evaluation design and methodology, scope, sampling and/or case study selections.

The evaluation results will be published in early autumn 2022.

7. Expertise Required

The evaluation team should consist of 3-4 international and country experts (TBD). One expert shall be nominated as the Team Leader. The expertise requirements for the Evaluation Team Leader/ Team are:

- Experience in evaluating policy dialogue/influencing/advocacy activities in the development policy and cooperation context.
- Experience in centralised, policy level evaluations in development policy and cooperation, with a strategic focus.
- Knowledge of the development policy and cooperation of the EU, including funding instruments.
- Readiness to use a variety of evaluation methods (e.g., survey, in-depth interviews, participatory methods etc.) as well as readiness and availability to disseminate the evaluation results and recommendations in the way that it supports managing and learning of the Ministry's staff and management.
- Preferably thematic/sectoral expertise in: green energy/growth/economy/transition/recovery; digitalisation; and education.
- Familiarity with Results-based management (RBM) and measuring development results.
- Understanding of Finland's cross-cutting objectives.
- Familiarity with development policy and cooperation and Finland's main goals and priorities in development policy and cooperation.
- Good command of the Finnish language due to limitations in the documentation.
- Should be flexible, available as well as able to commit and allocate sufficient amount of time to the entire evaluation process, including when faced with unexpected changes.



Quality assurance of the Consultant

Internal quality assurance:

The consortium implementing this evaluation will put in place a three-layer system of quality assurance for all products/reports: at the level of the Team Leader, through the EMSC&D, and in-house senior QA advisors.

The Consultant is in charge of the impeccable quality of English, Swedish and Finnish texts of the reports and related proofreading. The EMSC will be responsible for the good quality translations in Finnish. All deliverables shall be of publishable quality.

The evaluation team should do their best not to exceed the total length of 80 pages for the main evaluation report and prepare an executive summary that is publishable as a stand-alone document and that includes visualizations. A separate volume on annexes may be produced. It will be agreed upon during the inception phase which of the final deliverables are to be published. The inception report should also outline the structure of the main report and the planned contents of the annex(es).

The report should be kept clear, concise, and consistent. The report must follow the writing instructions and template provided by the MFA, and it should contain, among other things, the evaluation findings, conclusions, and recommendations. The logic between those should be clear and based on evidence.

The final draft report(s) will be sent for a round of comments by EVA-11. The purpose of the comments is only to correct any misunderstandings or factual errors.

All team members will need to subscribe to a confidentiality agreement which will comply to MFA norms for information security (including the different levels of protection of MFA's internal information management system). All team members will sign a non-disclosure agreement.

External quality assurance:

It should be noted that EVA-11 has obtained an internationally recognised expert as a Critical Friend (external peer reviewer) for the whole process. The person interacts directly with EVA-11 and provides expert opinions on the planning and implementation of the evaluations. EVA-11 may or may not integrate any such external advice as part of their overall feedback and management responses to the evaluation.

8. Management of the evaluation

The evaluation is commissioned by the EVA-11. The Evaluation Manager of EVA-11 will be responsible for the overall management of the process. The Evaluation Manager will work closely with other units/departments of the MFA and other stakeholders in Finland and abroad.

This evaluation is managed through the EMS, and it will be conducted by an independent evaluation team recruited by the EMS service provider (Particip GmbH – Niras Finland Oy).



There will be one Management Team responsible for the overall coordination of the evaluation. This consists of the EVA-11 Evaluation Manager, the Team Leader, and the EMS Service Coordinator and/or Deputy Service Coordinator (EMSC&D).

A reference group for the evaluation will be established and chaired by the Evaluation Manager. The reference group is constituted to facilitate the participation of relevant stakeholders in the design and scoping of the evaluation, informing others about the progress of the evaluation, raising awareness of the different information needs, quality assurance throughout the process, and using and disseminating the evaluation results.

The mandate of the reference group is to provide quality assurance, advisory support, and inputs to the evaluation, e.g., through participating in the planning of the evaluation and commenting on deliverables of the Consultant. The reference group is critical in guaranteeing transparency, accountability, and credibility, as well as the use of the evaluation and validating the results.

The Team Leader will manage the evaluation team. This requires careful planning to ensure that a common, consistent approach is used to achieve comparability of the data gathered and the approach used in the analysis.

The Team Leader will develop a set of clear protocols for the team to use and will convene regular online team meetings to discuss the approach. Particular attention should be paid to strong inter-team coordination and information sharing within the team during the process.

The evaluation team is responsible for identifying relevant stakeholders to be interviewed and organising the interviews. The MFA and embassies will not organize these interviews or meetings on behalf of the evaluation team but will assist in identifying people and organizations to be included in the evaluation.

9. Budget

The estimated maximum budget for this evaluation is 400 000 euros (VAT excluded), including travel and a separate contingency for any unexpected expenses. The final budget will be decided during the Inception Phase.

10. Mandate

The evaluation team is entitled and expected to discuss matters relevant to this evaluation with pertinent persons and organizations. However, it is not authorised to make any commitments on behalf of the Government of Finland or the Ministry. The evaluation team does not represent the Ministry for Foreign Affairs of Finland in any capacity.

All intellectual property rights to the result of the Service referred to in the Contract will be the exclusive property of the Ministry, including the right to make modifications and hand over material to a third party. The Ministry may publish the result under Creative Commons license to promote openness and public use of evaluation results.



Annex 3: Approach and Methodology

The evaluation looks at Finland's influencing of EU development policy and cooperation from three inter-related perspectives: (i) strategy, (ii) location and (iii) opportunities. At the roots of the analysis are the Ministry's development policy priorities and how these are reflected in its influencing plans. While adjustments and revisions of priorities have taken place at several points in time since 2014, five generic fields of gender equality, governance (including human rights), disability, education and climate have been the Ministry's key agendas during the entire evaluation period. COVID-19 has emerged as an additional influencing agenda since the outbreak of the pandemic.

Influencing outcomes in these priority areas were analysed in relation to the locations or places where influencing has taken place and then in relation to selected debates and processes that have served as institutional opportunities for influencing. More specifically, the places are the EU institutions in Brussels and the capitals of partner countries, while the opportunities for influencing during the evaluation period include the preparation of the new European Consensus on Development, Council discussion on Policy Coherence for Development, the Finnish EU Presidency in 2019, the NDICI negotiation process, the negotiation on a new post-Cotonou Agreement, Joint Programming (JP) and the response to COVID-19 and Team Europe approach. Each of these debates and events occurred at specific moments during the evaluation period and opened distinct opportunities for Finnish influencing. A special opportunity that occurred during this evaluation period was Finland's EU Presidency that applied particularly in Brussels but also had some repercussions in partner countries.

Overall approach

The evaluation is embedded in a **theory of change (ToC) framework**, which focuses on causal mechanisms or more specifically an understanding of how and to what extent the MFA's actions (inputs) have led – or are expected to lead – to specific changes in the strategic design and the implementation of EU development policy. A ToC provides a coherent and logical model or framework that explains and visualises how the activities undertaken by specific stakeholders contribute to a chain of results that generate intended or observed outcomes and impacts. In other words, the ToC shows the different steps and how they are built on each other to achieve the objectives of influencing. Each of the three evaluation questions (EQ) addresses specific parts of the ToC either at the output or outcome/impact level.

Within this overall framework, the evaluation is based on **five guiding principles**:

- First, it is **results-based**: the team analyses the actions of the involved stakeholders (i.e., all inputs by the MFA and other relevant Finnish actors directed at the influencing of the EU development policy and cooperation) and the results achieved based on these actions.
- Second, it is **outcome-oriented**: the team analyses the perceived and actual outcomes and impacts of influencing and thus assesses the effectiveness of the Finnish approach.
- Third, it is **process-oriented**: the team analyses the kind of processes – both in quantitative and qualitative terms – that the MFA initiated and followed to achieve outcomes. This includes an assessment of the efficiency of the chosen approaches to influencing.
- Fourth, it is **evidence-based**: the team applies a mixed-methods approach combining quantitative and qualitative data collection and analysis. Since influencing cannot easily be captured in quantitative terms **most of the evidence is qualitative**.



- Fifth, it is **utilisation-focused**: the evaluation is conducted in such a way as to promote the use and operationalisation of findings. For this evaluation, it also implies focusing on a **forward-looking analysis** that can contribute to future planning.

The evaluation follows a **dual track methodological approach** to strengthen the robustness of findings. The objectives of Finnish influencing are relatively clearly described in the influencing plans and it is thus possible to define what MFA influencing aims to achieve in relation to EU development policy and cooperation. Thus, the team assesses **progress towards the predetermined anticipated outcomes and impacts of influencing (Track 1)**. At the same time, the team pursued research in the opposite direction through **outcome harvesting (Track 2)**: evidence was collected of what has changed in EU development policy and cooperation in the areas defined by the Ministry's influencing plans for the EU, and then, working backwards, the team determined how and to what extent Finnish influencing contributed to the main changes. The outcomes can be intended or unintended, direct or indirect, but the connection between the intervention and the outcomes should be plausible. The analysis of the progress towards the *predetermined* anticipated outcomes and impacts of influencing also permits identifying those efforts and outputs that did not lead to any significant outcomes.

An **extensive review** of relevant Finnish and EU documents on development policy and cooperation was also conducted. Documents included policy/influencing objectives and positions of both, strategy and programming documents, guidelines, internal reporting, reviews, evaluation reports, other reports, emails (to the extent possible) as well as previous evaluations and reports on influencing.

Throughout the process, special emphasis was placed on collecting information on the institutional settings to allow contextualising the findings emerging from the exploration of the various sources. In addition to contextual factors, temporal factors are reflected in the analyses, to take into account shifts in policy priorities.

The synthesis phase was devoted to finalising the answers to the evaluation questions and formulating conclusions and recommendations based on the data collected and findings identified throughout the process. A standard report template has been used to gather and structure findings from documents, the survey and interviews to establish a robust, comprehensive and transparent evidence base.

The Evaluation framework

The evaluation framework or ToC describes how the MFA influencing approaches ideally lead to anticipated changes in the EU's development policy and specific actions in the implementation of development cooperation that are in line with Finland's strategies and priorities, as well as help determine the specific focus of the EQs.

The ToC presented in Figure 6 is adapted from the ToC developed for the Evaluation on the Finnish Development Policy Influencing Activities in the Multilateral Organisations to reflect the specific nature of influencing in the different and specific EU context. The ToC is the prerequisite to understanding the framework of activities, the instruments used, intended effects, the hierarchy and logical chain of objectives and as far as possible, relevant intervening external factors. Having established such an understanding, it becomes possible to focus the EQs on the most important

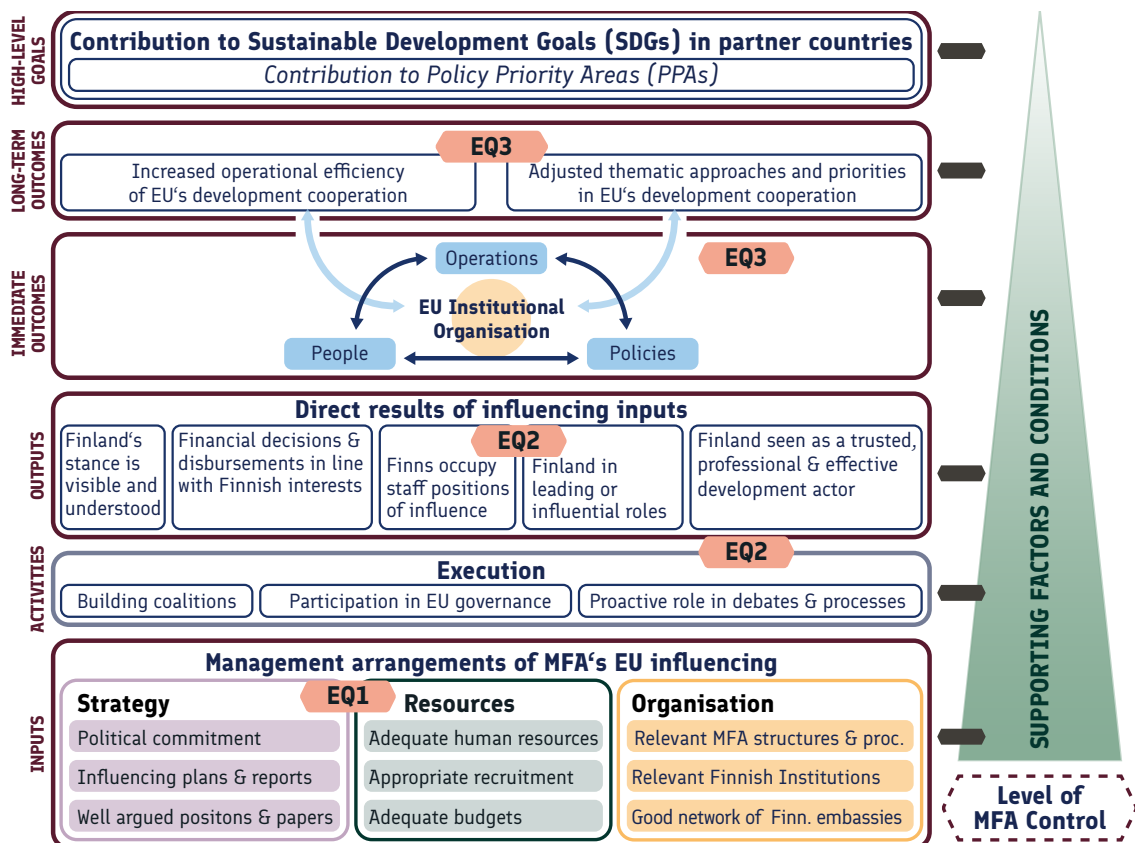


issues. The ToC presented here reconstructs and consolidates the most relevant elements of the MFA influencing strategy towards the EU.

The ToC takes the form of a linear results chain, *that is* a series of boxes comprising inputs, outputs, outcomes (immediate and long-term) and impacts. It is based on the assumption that influencing activities undertaken by the MFA produce the anticipated results by ‘flowing through’ the logical chain.

The ToC aims to present the strategy and logic of the Finnish influencing of the EU in an easily accessible, synthesised and holistic manner. While, as a consequence, not all individual actions and outcomes can be included on their own, they are all reflected by nine generic input categories, three activities, as well as four outputs, three immediate outcomes, two long-term outcomes and two impact areas.

Figure 6 Theory of Change



Source: Evaluation Team, based on the ToC developed for the Evaluation of Finnish Development Policy Influencing Activities in Multilateral Organisations, 2020. Note: devco = development cooperation, Main assumptions behind the ToC are outlined in Table 3 below.

Reading the diagram from bottom to top, the framework takes a step-by-step approach to describe how influencing activities are planned and implemented and, ultimately, contribute to achieving Finland's strategic policy priorities in development policy and cooperation and generally SDGs as impacts.



- Step 1: Influencing is planned and organised in the MFA (inputs and management arrangements);
- Step 2: Based on the MFA's inputs and management arrangements, various influencing activities are undertaken by the MFA;
- Step 3: The influencing activities contribute to influencing effects in the EU both with regards to the content of development policy/cooperation and the organisational processes underpinning the former (intermediate outcomes);
- Step 4: Certain long-term outcomes are believed to be associated with those effects.

Each step builds on the previous one. On the **input level**, the MFA invests political commitment, human resources and budget, and makes use of strategic planning, institutions and networks to carry out a number of influencing **activities**. These in turn are expected to produce a number of outputs on the EU level. Such outputs include Finnish voice and visibility in EU governance, financial decision-making, staff placement and exchanges, expressions of Finland's position, and formal and informal networking, and, overall, Finland's position as a leading and influential actor in EU development policy and cooperation. These **outputs** are expected to result in general immediate **outcomes** – the broader results and direct effects of influencing – that is positive changes in EU development policy-making that reflect Finnish priorities, strategic goals and values. Change is also anticipated on the organisational level of EU development policy and cooperation. These results are not the ends in themselves in the sense of on-off gains but are supposed to contribute to adjusted thematic approaches and priorities that, over time, contribute to increased operational efficiency in EU development policy and cooperation in Finland's core development priority areas. The ultimate objective of influencing on the **impact** level is achieving the SDGs. The firm establishment and implementation of an EU development policy that is in line with – and thus contributes – to Finland's policy priority areas, is a step towards this ultimate goal.

Looking back at this ToC on the basis of the findings that emerged, we can conclude that essentially it provided a very adequate representation of the causal chain involved in influencing the EU on development cooperation and policy (see Box 13). Thus overall, the ToC diagram proved its worth in the evaluation and could therefore continue to be used in any internal discussions (e.g., information session, training, strategizing and forward planning) on influencing EU development cooperation.



Box 13 Validating the theory of change

- At the first level of **inputs**, the nine generic inputs listed in the diagram and grouped under the three headings strategy, resources and organisation all played a role. Worth noting is that the input 'Adequate Human Resources' did emerge in the findings with the comment that "*staffing constraints place limits on EU influencing*" (F1.2.1). Equally, in relation to the input 'Relevant Finnish Institutions', Finding 1.2.2 indicated that the limited number of Finnish institutions that have passed the EU pillar assessment may prove to be a constraint in the future.
- At the level of **activities** all the three featured in the ToC (building coalitions, participation in EU governance, proactive role in debates and processes) had a significant place in the analysis. This then confirms their role as important mechanisms to push influencing.
- At the level of **outputs**, five were listed in the diagram and again all of them were important in the causal change. One of them, that is 'Finland seen as a trusted, professional and effective development actor' emerged as one of the most important reasons for Finland's success with influencing EU development policy and cooperation (F2.7.1 and 2.7.2).
- In terms of **immediate outcomes**, the evidence collected showed that Finnish influencing did impact on the trio people, policies and organisations, as represented in the diagram. Some very tangible evidence on the impact on policies was available (see Table 1) and many of the interviews, brought up the positive impact on people. Not surprisingly organisational impact was harder to demonstrate, but some of the policy outcomes (e.g., agreeing the NDICI-GE as a single instrument for all EU ODA) are of a nature that, if properly followed, are likely to produce long-term organisational change.
- Among the two **longer-term outcomes** listed in the diagram, the 'Adjusted thematic approaches and priorities in EU's development cooperation' can be confidently predicted from the evidence collected, whereas it is harder to be reach a conclusive judgement on whether 'Increased operational efficiency' will be a long-term outcome.
- Finally, in terms of movement towards the **high-level goals**, Figure 4 illustrates how the harvested outcomes identified contribute to the SDGs.

All steps above inputs, that is the activities and the achievement of anticipated outputs and outcomes, require the presence of favourable framework conditions or internal and external enabling factors. These factors include coalitions of interest and like-minded actors supporting Finnish interests, as well as conducive structural conditions such as sufficient budgetary means. Equally important is the absence of veto actors that block or counter the Finnish influencing through their influencing in opposite directions or budget cuts. These issues as such are not evaluated but will be considered as contextual factors. Though, where Finland is in a position to affect some of these contextual factors, for instance, by putting effort into coalition building, and decides to do so, this has been included in the evaluation.

We assume that the process of influencing is never static. Experiences and lessons learnt feed back into the process and change the approach to influencing. The more acceptance, trust, and support the Finnish influencing of the EU generates, the easier it becomes for the MFA to improve the inputs in order to achieve even better results. There are also a number of assumptions at each level of the ToC diagram, these are summarised in the following table.



Table 3 Summary of main assumptions

LEVEL AT WHICH RELEVANT	ASSUMPTIONS
Overall ToC	<ul style="list-style-type: none"> • Influencing effects are a result of multiple activities through different channels and not simply results of individual influencing efforts. • For influencing to occur effectively, three elements are required simultaneously; <ul style="list-style-type: none"> ◦ MFA organises and implements itself including funding decisions, appropriately, ◦ MFA communicates its messages to the outside world via different means, ◦ Finland develops a positive reputation/image, based on its expertise and successful involvement in EU affairs and EU development cooperation and policy. • The process of influencing is dynamic and constantly adapting to the environment.
Outcome level	<ul style="list-style-type: none"> • Significant outcomes involve a mix of influencing people, policies and operations. • EU and MS staff consider the MFA's inputs important and worthwhile considering because (i) Finland is considered a trusted and valued partner, (ii) Finnish experts possess relevant knowledge and expertise, and because of (iii) Finland's role as an EU MS. • MFA influencing activities should be timely and effectively support and/or complement ongoing decision-making or policy development processes in the EU. • Finland's political priorities, objectives, and activities remain stable over sufficient time to allow for apparent and aggregate influencing effects. • MFA influencing activities targeted at the EU are effectively coordinated across activity types and MFA units and departments. • The EU has the capacity to adapt and change, i.e., that it is possible to institutionalise change and that new policies, priorities, and procedures can become reflected in the institution's development cooperation. • The environment is favourable to change, including the views of other MS and events in international development beyond the EU's sphere of direct influence.
Output level	<ul style="list-style-type: none"> • Finland has linkages into corporate governance and operational processes in the EU. • Relationships, networks and alliances: all kinds of relations between people or institutions in the context of influencing exist and are built upon.
Activities level	<ul style="list-style-type: none"> • MFA staff is motivated, have sufficient time and opportunities and the necessary influencing skills and knowledge (e.g., on how the EU works) to carry them out.
Inputs	<ul style="list-style-type: none"> • Purposes, goals, strategies, plans and objectives for influencing must be relevant, useful and realistic and well communicated to relevant MFA staff. • The MFA can mobilise the resources required. • Influencing activities and their results must be reliably monitored and analysed for drawing lessons, learning, informing future decisions and accountability.

Source: Evaluation team

Assessing influencing requires a **common understanding of how influence contributes to effects in the EU**. Here, the evaluation draws on the conceptual framework of the MO Evaluation to ensure maximum comparability and synergies between the findings and conclusions of the two evaluations. In addition, Small State Theory provides some useful insights that have been incorporated.



Influencing effects can be realised in people, policies and operations. Together and over time, these can impact the EU as a whole. Effects can occur at each organisational level of the EU:

- The governance level – the Council, its working groups, the rotating EU Presidency of the Council and the European Parliament;
- The headquarters level – the European Commission and the EEAS;
- The country level – the EU Delegations in each partner country;
- The individual staff level – officials of the EU institutions – Commission, EEAS and European Parliament.

It should be noted that when assessing influencing effects on people, the team will not solicit or relay statements about individuals and their abilities. The objective is to generate generic findings about the role of stakeholder groups and not individual persons.

'Policies' stand for a wider array of effects on policies, strategies, plans and procedures. In addition, policies can also be directly influenced, for example if MFA staff participates in their formulation. Effects on policies can apply to and affect staff and operations at some or all levels in the EU. We assume that they are usually approved and adopted by a higher level than the one(s) they are applied to. Adapted or new policies, strategies, plans or procedures can lead to effects on operations in how the EU implements its work. Operations can also be directly influenced, for example, if seconded MFA staff apply a different management style in a leadership position in the EU. Effects on operations can occur at some or all of the levels in the ToC above, and we characterise the intensity of influencing effects in the same manner as for policies, from acknowledgement, via minor and significant changes, to fundamentally changed operations (based on (Palenberg et al., 2020)).

After considering the significance rating system used in the MO evaluation the evaluation team decided it was important to devise a tailor-made rating system for the evaluation that reflected the way EU decisions are taken (see section 3.2 and Annex 4).

Three major differences were identified between the MOs and the EU when it comes to decision making in the area of development cooperation:

- The first is the EU's system of three institutions (Commission, Council and Parliament) which all have a specific role to play that is laid out formally in the Treaty. This includes a distribution of legal powers. Within the Council there is also a prescribed way of preparing decisions through working parties on which all MS have a seat.
- The second major difference is that most EU development cooperation is funded from the EU budget, and not from a system of core and earmarked funds as used by Mos. From time to time the EU does agree to establish Trust Funds that MS can contribute to and thereby gain influence on how these are spent, but the vast bulk of EU funds are from the EU budget which is governed by the Council and Parliament's legal decisions at the start of each 5-7 year MFF. Decisions on funding allocation are therefore far less of an important influencing channel than with Mos.
- A third difference is that policy decisions taken by the EU Council do not just affect the Commission but are also expected to influence the way EU MS run their own bilateral programmes. While these cannot be enforced legally, they do carry moral weight and MS do therefore pay close attention to what is agreed and negotiate accordingly, as they much



prefer that what is agreed at the EU is consistent with the way they want to run their own programmes. It thus also becomes important to influence a majority of other states to pursue the lines your own MS considers important, giving rise to the importance of coalition building in EU decision making.

Small States Theory is more specifically attuned to the EU context with its 27 MS that vary considerably in size from Germany down to Luxembourg. SST suggests that, in such a context, small states need to work together to achieve their objectives. By clubbing together with other like-minded states in coalitions, smaller MS are able to influence outcomes and decisions in the Council. SST also suggests other practices that small states can use to enhance their positions. These have been used to derive a number of simple hypotheses that are particularly useful for EQ2.

Evaluation questions and matrix

The initial set of EQs can be found in the ToR (see Annex 2). The team realised that EQ1 and EQ3 in their original wordings overlapped to a great extent and therefore proposed new EQs 1 and 2. Between them, these keep the focus of the EQs in the ToR but also present the scope more clearly. The new EQ3 addresses specifically Finnish influencing of the EU's organisational settings (in the broadest sense) relevant for the planning and implementation of development policy and cooperation in Brussels and in partner countries.

According to the ToR, the DAC Evaluation criteria covered by this evaluation are “*relevance, effectiveness and coherence. In addition, further questions to do with planning and implementation are included under the heading of ‘management’, although some may also appear under the coherence criterion.*” However, in the team’s understanding efficiency is also addressed and will thus be considered. Against this backdrop, the three EQs which guide the evaluation are:

EQ1: ORGANISING THE MFA FOR EFFICIENT INFLUENCING OF THE EU



EQ1: To what extent are the MFA's management approaches, arrangements, processes, and tools efficiently organised to maximise Finland's influence from the point of view of development policy and cooperation?

This EQ covers the efficiency and coherence of the Ministry’s ability to organise itself for effective influencing. In terms of the ToC, it therefore looks at the **inputs** to the EU influencing process in terms of strategy, resources and organisation. These questions are addressed throughout the **organisation** (i.e., the various levels of engagement in Helsinki, Brussels, partner countries).

In particular, within this EQ the following issues were investigated:

- The clarity of the approach and strategy applied by MFA staff and other Finnish actors engaged in influencing, i.e., the extent to which overall policy priorities have been logically and diligently translated and broken down into actionable objectives and plans to effectively guide influencing activities;
- The coherence of objectives and synergies of actions between the different channels, levels of engagement, and actors working on EU influence at the Ministry including in its representations and embassies and with a wider group of relevant stakeholders in Finland;



- The level of resources (including staff and personnel) used by Finland to gain visibility in EU's relevant international cooperation debates;
- The organisation of the MFA including clarity on roles and responsibilities for EU influencing of the different organisational units and the opportunities for joint working both within the Ministry and with external stakeholders;
- Learning mechanisms that have been established and used, i.e., how relevant information, understanding, insight and knowledge was generated from monitoring and reporting of influencing activities and their results and shared within the Ministry.

EQ2: A RELEVANT, EFFICIENT, AND COHERENT INFLUENCING PROCESS



EQ2: To what extent has the MFA succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU in a relevant, coherent and efficient manner?

This EQ addresses the coherence, relevance and efficiency of Finnish influencing focussing on the **activities and output levels** in the theory of change. It considers how the Ministry has engaged in influencing and what approaches and channels it has used.

The EQ particularly looks at whether the MFA has:

- Engaged at various levels and used different channels **to build coalitions**, with the EU and other EU MS;
- Used a variety of different channels, including staff secondments, to participate proactively and purposefully in **EU governance structures**;
- Taken advantage of relevant **EU policy debates and opportunities**, including Finland's EU Presidency;
- Sought to make sure that Finland's stance has been **visible and well understood** by EU institutions and MS;
- Been able to establish a **leading or influential role** for Finland on some priority issues;
- Been able to encourage **EU financial decisions** and disbursements in line with Finnish interests;
- Built up Finland's **image as a trusted, professional and effective** development policy and cooperation actor to be followed and respected;

The work of Small State theorists Panke (2012) and Tiilikainen (2006) is reviewed in Annex 4 on context. The hypotheses derived from Panke and Tiilikainen in Annex 4 (Box 15 and Box 16) are also reproduced in Table 4 below. They were used as an additional step in the analysis of the findings and apply particularly to the influencing process (EQ2) phase of the analysis.

Table 4 SST hypotheses

NUMBER	SST HYPOTHESES
SST-H1	Limited resources are concentrated on a few carefully chosen objectives
SST-H2	Capacity building strategies with external stakeholders are used to obtain additional information or increase institutional memory of the EU
SST-H3	Causal arguments that rest on solid scientific expertise are used particularly for technical issues
SST-H4	When faced with adverse positions a re-framing strategy is used to link policy negotiations to a broader context
SST-H5	Emphasises respectability and credibility in foreign policy and cooperation
SST-H6	Builds coalitions that favour a community-centred rather than an intergovernmental approach in relation to EU decision making
SST-H7	Ensures its policies are coherent and based on broad political consensus

Sources: Evaluation team, based on Panke (2012) and Tilikainen (2006)

EQ3: EFFECTIVENESS OF INFLUENCING OUTCOMES



EQ3: To what extent has the MFA succeeded in obtaining influencing objectives/changes in the EU for the advancement of the Finnish and international development agenda and interests?

This EQ covers the effectiveness of influencing the EU's organisational processes. It looks in particular at the outcomes achieved and then seeks to assess how this was done and what enabling and hindering factors can be identified.

More specifically the EQ addresses:

- The degree to which influencing efforts resulted in new or improved policy and strategic approaches to EU development policy and cooperation in partner countries both in Brussels and in partner countries;
- The degree to which influencing efforts (related to Finnish and international development agenda and interests) were translated into improved EU strategic and policy frameworks with regards to a) the Finnish policy **objectives** within these priority areas, and b) the overarching **principles** of development policy and cooperation. E.g., the extent to which Finnish interests, policies and initiatives can be identified in EU documents and communications;
- Organisational change and evolution in Brussels, i.e., the extent to which Finland has contributed to improved EU management arrangements, processes and tools as the result of leadership and initiatives at headquarters level. Main attention will be given to the Finnish Presidency and other instances of Finnish leadership within the EU, e.g., post-Cotonou negotiations; and
- Organisational changes and evolution in partner countries, i.e., the extent to which Finland has contributed to improved EU management arrangements, processes and tools as the result of leadership and initiatives (e.g., thematic lead in EU-MS fora, delegated cooperation, etc.) at the country level;



- In addition to analysing the pull and push factors that explain the effectiveness – or lack thereof – of Finnish influencing, the EQ helps identify good practices and success stories, but also obstacles or hindering factors with examples of influencing attempts that were less effective or unsuccessful and what can be learnt from these cases.

Conclusions and recommendations

Findings from all EQs provide the basis for, and feed into, the **conclusions and recommendations** which, among other things, seek to address the following aspects:

- What have been the strengths, weaknesses, best practices and challenges of the Finnish influencing approach in terms of effectiveness?
- What have been the enabling or hindering factors in effective influencing towards the EU?
- What, if any, might have been missed opportunities or unused potential in influencing the EU?

The conclusions and recommendations have also been drafted specifically to respond to the objectives of the evaluation as spelt out in the Terms of Reference (Annex 2). Aside from questions of effectiveness of influencing and factors that have helped or hindered in this process as referred to above, the objectives also ask for forward looking reflections [emphases added]:

- *“To provide insight on the **best opportunities and ways to engage and influence in the future, especially under the new EU funding instrument and the evolving development cooperation scene.**”*
- *“To provide insight on how the Ministry together with other relevant stakeholders could **develop their practices to maximise influencing the EU for the future, taking into account available human and financial resources.**”*

Table 5 presents the detailed evaluation matrix.



Table 5 Evaluation Matrix

EQS	EVALUATION CRITERIA	JUDGEMENT CRITERIA	METHOD	DATA SOURCES
<p>EQ1: Organising the MFA for efficient influencing of the EU</p> <p>To what extent are the MFA's management approaches, arrangements, processes, and tools efficiently organised to maximise Finland's influence from the point of view of development policy and cooperation?</p>	<p>Efficiency Coherence</p>	<p>1.1 <u>Strategy</u>: The approach and strategy developed by the Ministry to influence the EU starting from its influencing plans, was efficient, coherent with wider MFA policies and well understood by all actors, including for the embassies and for the wider Finnish government bodies involved and the Parliament</p> <p>1.2 <u>Resources</u>: The staffing levels and budgets deployed by the MFA at various levels of engagement for influencing the EU have optimised the use of the resources available</p> <p>1.3 <u>Organisation</u>: the roles and responsibilities of the Ministry's various units and actors (including the embassies) involved in influencing the EU and the systems for linking them were efficient, clearly established and well understood</p> <p>1.4 <u>Organisation</u>: Opportunities for joint working within the Ministry (including the embassies), and with the wider Finnish government and Parliament have been maximised</p> <p>1.5 <u>Organisation</u>: Learning feedback and monitoring mechanism on influencing have been established and used</p>	<p>Systematic desk review of Finland's organisational efficiency for influencing EU's development cooperation;</p> <p>Process assessment of how MFA organises its influencing activities and learning.</p> <p>Interviews principally in Helsinki</p>	<p>Finnish and EU policy and strategy documents;</p> <p>Influencing plans and reports;</p> <p>Reports, memos and assessments (Finland, EU);</p> <p>Email exchanges;</p> <p>Potentially minutes of meetings;</p> <p>Figures of financial contributions to EU development cooperation by other countries and other sources to be defined</p> <p>Interviews with MFA, Finnish and EU officials in Brussels, Finnish embassies and EU Delegations in case study countries;</p> <p>E-survey of Finnish embassies and EU Delegations in Finland's partner countries, and relevant NGOs.</p>
<p>EQ2: A relevant, efficient, and coherent influencing process</p> <p>To what extent has the MFA succeeded in promoting and incorporating its development policy objectives and principles in its engagement and relations with the EU in a relevant, coherent and efficient manner?</p>	<p>Coherence Relevance Efficiency</p>	<p>2.1 <u>Activities</u>: The Ministry has engaged at various levels and used different channels in a relevant, coherent, and efficient manner to build coalitions, within the EU and with other EU MS on various priority areas</p> <p>2.2 <u>Activities</u>: The Ministry has engaged at various levels and using a variety of different channels (including staff secondments) in a relevant, coherent and efficient manner to participate proactively and purposefully in EU governance structures in relation to its various priority areas</p> <p>2.3 <u>Activities</u>: The Ministry has engaged at various levels and used different channels in a relevant, coherent and efficient manner to take advantage of the specific and relevant EU policy debates and opportunities that have arisen, including Finland's EU Presidency</p>	<p>Interviews in Helsinki Brussels, and partner country to analyse achieved outputs against planned objectives</p>	<p>Delegations in Finland's partner countries, and relevant NGOs.</p>



EQS	EVALUATION CRITERIA	JUDGEMENT CRITERIA	METHOD	DATA SOURCES
		<p>2.4 <u>Outputs</u>: Finland's stance has been visible and well understood by the European Commission and EEAS as well as by other EU institutional actors and MS</p> <p>2.5 <u>Outputs</u>: Finland has established a leading or influential role on some priority issues</p> <p>2.6 <u>Outputs</u>: EU financial decisions and disbursements are in line with Finnish interests</p> <p>2.7 <u>Outputs</u>: Finland's image as a trusted, professional and effective development policy and cooperation actor to be followed is well recognised and respected</p>		
<p>EQ3: Effectiveness of influencing outcomes</p> <p>To what extent has the MFA succeeded in attaining influencing objectives/changes in the EU for the advancement of the Finnish and international development agenda and interests?</p>	Effectiveness	<p>3.1 Significance of the influencing outcomes and Finland's contribution to achieving them</p> <p>3.2 Achievements against Finland's influencing objectives</p> <p>3.3 Contributing and hindering factors (internal / external)</p>	Interviews in Helsinki and Brussels, and partner countries including an assessment of outcomes, both planned/expected and unplanned/unexpected, following an applied outcome harvesting process.	

Source: Evaluation team



Evaluation methods

Five main methods were applied to answer the evaluation questions, as follows:

1) A **systematic desk review** was carried out to define to what extent the MFA has succeeded incorporating its development policy objectives and principles in its engagement and relations with the EU and how it was organised to conduct EU influencing. The exercise involves a stepwise process, including (1) selection of documents to be included (exclusion and inclusion criteria), (2) topics to be documented, (3) screening process and data extraction, (4) summary and analysis of data, and (5) reporting. The topics to be observed and analysed as part of this evaluation were focused and narrowed down to the most relevant aspects only guided by the judgement criteria presented in the evaluation matrix.

Output: A summary matrix or figure and related findings that allow building a general understanding of how well Finland has achieved in promoting its influencing objectives at output level.

2) A light **peer review** was developed to allow for a comparison with a small number of other EU MS. The group of peer countries would be selected using ODA levels, human resource commitments, plus some of the other criteria for which secondary data is readily available online. The 'benchmarking' exercise aims to compare Finland against other EU small or medium MS that put a similar amount of effort into EU development policy influencing, what resources and approaches they used and, if possible, whether similar types of results could be identified. Specific research questions related to the evaluation's JCs were drafted for the review.

Output: Findings for each research question arranged by country and then in a comparative summary. Relevant findings were then integrated in the evidence matrix.

3) A **process assessment** unpacked and described the internal processes and mechanisms by which Finland implements its EU influencing activities (EQ2). The analysis looked at how Finland plans and documents its interactions with key stakeholders at different levels, how and where learning happens, and how the MFA communicates the achievements and challenges to relevant actors. Three particular process cases are looked at in more depth: (i) the Finnish EU Presidency in 2019, (ii) the negotiation of the NDICI-GE single instrument (in the country cases it proved more relevant to extend this to the JP exercise rather than consider the negotiation of the instrument itself on its own), and (iii) the EU response to COVID-19. The three are of a qualitatively different nature which it is hoped will lead to useful insights. The first two could be foreseen and planned for while the third was ad-hoc and required a reactive response. For the latter two, Finland was one among 28/27 MS while for the first it was in the unique position of *prima inter pares* with particular privileges that only occur periodically in EU institutional cycles.

Output: The evidence from this analysis was integrated into the evidence matrix. In addition, these processes were summarised in three concise briefs (2-4 pages) in Volume 2 and examples of different aspects were highlighted in appropriate places in the main text using text boxes.

4) **Country case studies** formed a significant bulk of the research work in the evaluation. The case studies included two main components: (1) an **assessment of achieved outputs against planned objectives at the country level**; (2) **harvesting of outcomes**, both planned/expected and unplanned/unexpected. The first part lays the foundation for the identification of main influencing effects at the country level. Further, the step allows observing any outcomes that were aimed to be achieved but never materialised or remained at a lower level than was initially planned. Two case studies were conducted in Nepal and Tanzania. A third planned for Ukraine had to be scaled



into a 'mini-case' in view of the war and the impossibility of interviewing many staff other than a few MFA officials. Interviews in Brussels were originally conceived of as a fourth case study, but in practice the interviews in Brussels provided the main possibility for triangulating and verifying evidence from MFA sources. Logically therefore they needed to be integrated into all the aspects of the research rather than kept as a separate case study.

Output: Country case study annexes that include the components described in Table 6. The case study reports do not include any recommendations, but their findings were incorporated into the general evidence matrix.

Table 6 The main elements of analysis included in the country case studies

ELEMENT INCLUDED IN COUNTRY CASE STUDIES	RELATED TO EQ
Brief description of the context in form of a fact sheet	
Description of how influencing work was managed at the country level	EQ1
Description of Finland's influencing activities in the country and its expected results	EQ2
Outcome descriptions in the form of outcome stories or outcome cards (thematic influencing and influencing on organisational efficiency), including a description of the observed change, its significance, and the level of contribution by Finland (to the extent possible)	EQ3
Implications for the main report	

Source: Evaluation team.

5) The **outcome harvesting** method complemented the evaluation team's more linear approach to the country case studies and interviews in Helsinki and Brussels. Outcomes were identified as they emerged from the research and the team sought to understand them using a causal link approach that examined the contributing / hindering factors for selected outcomes. The outcome harvesting followed six standard steps, as presented in Table 7.

Table 7 Outcome harvesting method

OUTCOME HARVESTING STEP	APPLICATION IN THIS EVALUATION
Design the harvest	Team's joint planning session at the beginning of the implementation phase.
Review documentation and draft outcomes	The outcome leads for Brussels were harvested in the main desk review. Initial desk review of country case studies to map outcome leads to be investigated further.
Engage with informants	Interviews in both Helsinki and Brussels served to confirm outcomes. Country case study implementation plan (stakeholder mapping, scheduling of interviews, key informant interviews, focus group discussions, as applicable). The survey was also used to support the outcome harvesting process. Note: At this stage, the harvested outcomes will be prioritised and only a limited number of the most relevant outcome stories will be documented.
Substantiate	The 'shortlisted' outcome stories were substantiated through triangulation to strengthen their evidence-base.
Analyse, interpret	The documented outcome stories were reflected in the context of the assessment of accomplished outputs against planned objectives to build an overall picture of achievements/failures at the country level / Brussels.
Support use of findings	Part of the synthesis documented in the main evaluation report.

Source: Evaluation team, based on Wilson-Grau & Britt, 2013



Output: A list of harvested, verified and rated outcomes. All the listed outcome statements were harvested during data collection; they have been selected and refined, after evidence was triangulated to confirm initial claims made by key informants during the interviews. In finalising the list, particular importance was given to ensuring that (i) claims made by MFA staff were confirmed by EU informants, (ii) EU documentation helped confirm the scale of the agreed changes and strength of commitment, and (iii) selected activities and outputs carried out by Finland and leading to the outcomes could be verified.

Outcome rating: The evaluation team rated the significance of the achieved outcomes and the significance of Finland's contribution a bit differently from the approach used in the MO evaluation. This is because, EU's decision making is complex, multi-actor and multi-layered, making it difficult to draw the boundaries between people, policies and operations, and what can be considered as low, medium, or significant impact. Successful influencing requires not just 'influencing people' (as it would with a single institution), but also building coalitions (as stressed by Small State Theory) and to varying degrees securing agreement amongst all MS and three EU institutions.

While the objective of influencing is usually seen as provoking a change in the direction desired, it became apparent that in certain cases maintenance of the status-quo position may also require influencing. Thus, for example, in the field of gender equality, it has taken real efforts by Finland and other like-minded states to maintain the status-quo in agreed EU development policy in the face of some MS who wish to see less ambitious approaches to gender equality. While maintaining a status-quo situation remains below Finland's ambition, this level of influencing, achieved in the face of stiff opposition from some MS, is acknowledged by most stakeholders as a relative success. Similarly, as shown in the protracted NDICI negotiation process, achieving an intermediary step allowing to move closer to the adoption of a final policy, instrument, or practice can also be considered as a success in its own right. These considerations were thus also integrated in the rating system.

The rating system used to support this evaluation is given in Table 8 below. It is inspired partly by contribution analysis whereby steps are first taken to assess the claims and then afterwards to check the donor contribution. The system has two dimensions:

1. A rating on the significance of the outcome in shaping the EU's development cooperation and policy. This is rated as follows:
 - The **scale of the agreed changes** (from maintaining the status-quo (rating 1) to contributing to a policy shift (rating 3), and anything in between (rating 2));
 - The **level of commitment achieved** by the EU institutions (starting with the Commission) and other MS, with NDICI being the only legislative process needing approval from both the Council and Parliament (rating 4).
2. A rating on the effort required or the **significance of Finland's contribution** (three levels):
 - Finland's contribution as an (active) follower, when Finland plays a supportive role, alongside other MS, but does not feel the need to 'speak up', instead preferring to let other MS lead (rating 1);
 - Finland's contribution as a leader, for matters that are not considered divisive and/or where no strong opposition is expected (rating 2);
 - Finland's contribution as a leader for matters where there is some visible disagreement amongst EU institutions and/or EU MS (rating 3);



- Thus, most points are awarded in situations where Finland is a leader and where there is disagreement, less points if Finland is a leader but there is general agreement, and least points if Finland is just a supportive follower in a decision process where other MS have led.

The actual rating or points for each level of each criterion are given in Table 8. This table also records the overall cumulative rating in its final column. The full detail of the points awarded to each outcome for each of the three criteria are in the expanded Table 13 in Annex 6

Table 8 Outcome rating methodology

CIRCUMSTANCES MAKING THE OUTCOME (OR RESULT) MORE OR LESS DIFFICULT TO ACHIEVE	
Scale of agreed changes	1: Consensus <i>that reflect Finland priorities</i> has been maintained 2a: EU has made new financial pledges at country, regional and global level <i>that reflect Finnish priorities</i> 2b: EU has changed its approach to interventions at country, regional and global level <i>that reflect Finnish priorities</i> 2c: EU has taken additional (intermediary) steps to promote changes at country, regional and global level <i>that reflect Finnish priorities</i> 3: EU has made a new policy commitment (incl. financial targets) <i>that reflect Finland's priorities</i>
Level of commitment	1: Commitment made by COM / EUD 2: Commitment made by COM and selected MS 3: Commitment formally approved by MS (Council) 4: Commitment formally approved by MS (Council) <u>and</u> European Parliament
SIGNIFICANCE OF FINLAND'S CONTRIBUTION (OR EFFORT REQUIRED TO ACHIEVE THE OUTCOME)	
1: Finland as a follower 2: Finland as a leader – in situation of (general) agreement and/or absence of strong opposition 3: Finland as a leader – in situation of (some) disagreement	

Source: Evaluation team

While this rating incorporates a simple scaling system, because of the above considerations, it does not go so far as to provide a basis for a judgement on whether the achieved outcomes and/or Finland's contribution should be considered as weak, medium or strong.

Beyond the ratings the process of achieving of the outcomes is also explained in the more detailed background notes in Annex 6.

The main **limitations** to the outcome harvesting and rating methodology are as follows:

- Bias in favour of HQ/Brussels: Finland's influencing in partner countries tends to receive lower scores, because the policy / strategy that guides EUD decisions in partner countries has already been determined and influencing takes place at the level of implementation.
- Timescale: The time it takes to influence the EU is only partially or indirectly reflected in the rating methodology. Typically, a process like the NDICI negotiation takes several years because all EU institutions need to be involved and agree all-encompassing legal regulations, covering all development cooperation priorities. This contrasts with other influencing



outcomes that only involve the Commission (often already aligned with Finland's priorities) and may take a few months / less than a year to achieve; even then, however, influencing would have been based on early discussion, possibly dating back several years, for which evidence is not always available.

- Bias in favour of achieved outcomes. The method depends on the existence of outcomes to harvest and if there are no outcomes it will not produce cases to study. This can be overcome by looking at the objectives of influencing and identifying some which were not achieved. This is tackled in section 4.3.3 when discussing the extent to which the MFA's objectives were or were not met and some of these examples are highlighted in boxes in section 4.
- Non-achievement of outcome objectives: Outcome harvesting only provides one entry point to EQ3 "To what extent has the Ministry succeeded in attaining influencing objectives/ changes in the EU ...?" To respond to this question on the 'extent' of success, further analysis is required, focusing on the achievement (or non-achievement) of outcomes against MFA's own influencing objectives.

Choice of judgment criteria for the outcome harvesting: In line with the above methodology, the judgment criteria for analysing the selected outcomes under EQ3 were revised as follows:

- JC3.1 Significance of the influencing outcomes and Finland's contribution to achieving them;
- JC3.2 Achievements against Finland's influencing objectives;
- JC3.3 Contributing and hindering factors (internal / external).

This provided the basis for a better analysis of whether the Outcomes identified were 'real' outcomes which required significant influencing work to achieve; whether they matched up with the MFA's influencing objectives and finally how they were achieved in practice (enabling and hindering factors) as this was considered important in terms of learning lessons.

Although these JCs are different from those originally suggested they are rooted in the original ones and pick up many of their features such as the significance and the nature (operational/policy) of the change. Significance was also an important part of the analysis in the MO evaluation, although a different rating system suited to the EU has been devised. The distinction between immediate and long-term objectives proved difficult to distinguish clearly so it was dropped.

Data collection methods and sources

The main data collection methods used were (i) semi-structured interviews, (ii) focus group discussions, (iii) documentary review, (iv) a targeted e-survey, and (v) financial data (mainly the peer review). The multiple sources of information and sample sizes in each case are vital to help ensure a good degree of triangulation and verification of evidence collected.

Interviews were conducted with officials of MFA and other relevant government agencies, Finnish officials at the European Commission (particularly DG INTPA) and those who are involved in meetings and working groups of the Council of the EU and in preparing European Council meetings, Finnish diplomats at the EEAS, Finnish members of the European Parliament's Committee on Development (DEVE), other relevant stakeholders involved in the conduct of Finland-EU relations with regards to development policy, and officials from other EU MS in the respective institutions.



A total of 110 persons were interviewed (see Annex 10). Figure 7 lists the relevant stakeholder groups interviewed.

Figure 7 List of organisational units contacted by the team for interviews



Source: Evaluation team.

Furthermore, an **e-survey of the Finnish embassies and EU Delegations in the 14 partner countries** in Finland's bilateral development cooperation was launched early in the implementation phase and conducted in parallel with interviews. The survey is based on a short questionnaire with a mix of open and closed questions that focus on the JCs to be informed by this data collection tool. Recipients were the Finnish Ambassadors and the EU Heads of Cooperation respectively who could then decide to delegate the task of filling in the questionnaire to the most suitable colleague. The survey report can be found in Volume 2.

Three partner countries – Nepal, Ukraine and Tanzania – were selected for **online interviews**⁴⁶ based on criteria explained below. Consultations with Finnish embassies, EU Delegations, MS embassies, and selected national government stakeholders, implementing partners of major EU-funded interventions and potentially some of their key beneficiaries were conducted. The information gathered for the case studies has been crucial to assess the effects of Finnish influencing and served four main purposes: (i) triangulating information stemming from other methods/tools; (ii) confirming the findings emerging from the desk phase, including comparing with results from the evaluation on influencing multilaterals; (iii) enriching the evidence base, and (iv) identifying 'human- interest stories' to illustrate the extent and effects of Finnish influencing.

⁴⁶ Although the COVID-19 pandemic had reached a stage where travel was starting to open up again, it was decided that as the interviews to be conducted were all European officials in embassies and delegations, it could be assumed that they would all have good internet connectivity. In these circumstances it was decided, both to gain time and to avoid any possible health risks, to not do field missions, but rather do everything online. In addition, this meant the interviews could be more spread out over time to suit informants' convenience better.



Table 9 summarises the main purpose and key elements of the approach envisaged for each tool/method.

Table 9 Main data collection tools and methods

DATA TOOLS	APPROACH/DESCRIPTION	EQS	METHOD
Document review	Following the literature reviewed in the inception phase, the team carried out further documentation review at the beginning of the implementation phase covering a range of documents, including MFA policy and strategy documents, assessment, communications and minutes of meetings; EU policy documents, EU strategy evaluations, minutes of EU meetings (to the extent available), relevant documentation of EU MS, documentation related to EU and Finnish development cooperation at regional, country and programme level.	All EQs	All methods
Sampling	The team identified a sample of three countries and three process opportunities for influencing for a more in-depth analysis of Finnish influencing in Brussels and at country level. The team has followed a purposive sample strategy, adopting a context-sensitive approach for selecting these cases. Discussion with the reference group provided important input to the final selection of the sample that will be used by the team.	All EQs	Systematic desk review Case studies Process assessment
Interviews and group discussions	During the second part of the implementing phase, the team complemented the documentation review with semi-structured interviews and a couple of group discussions in Helsinki and Brussels often via video call. For the country case studies, the team conducted semi-structured interviews with informants in EU Delegations, Finnish embassies and other EU MS embassies.	All EQs	(To complement the desk review) Process assessment Case studies
Survey questionnaire	The online survey of all Finnish embassies and EU Delegations in the 15 recipient countries of Finnish ODA allows for the documentation of stakeholders' perceptions on the organisations, role and influence of Finland on the EU's development in the respective countries. The survey was based on a short questionnaire of open-ended questions combined with some with rating scales, that focussed on some of the JCs. Questions for the Finnish embassies and EU Delegations varied in part to capture differing perceptions of Finnish influencing. The team then analysed the outputs of the survey and incorporated the feedback in the final report.	All EQs	Online survey results analysis (will also complement country case studies)

Source: Evaluation team.

Country case studies

The evaluation takes a holistic view of Finnish influencing strategies and activities in all areas identified through the document review. However, for a deeper analysis it was necessary to focus on a selection of key themes to keep the evaluation manageable and avoid the risk of stretching the analysis too thinly.

- In addition, the ToR stipulated an 'ideal approach' according to which countries should be selected based on the following criteria to allow for a comparative analysis of influencing under different structural conditions: A country which is a recipient of both sizable EU and Finnish ODA and where a large number of EU MS is present (including Finland);



- A country that is a recipient of both EU and Finnish ODA and where Finland is one of only a small number of MS present;
- A country that is a recipient of EU but not Finnish ODA and where Finland is present.

The third criterion had to be excluded as it did not meet the overarching partner country requirement. Instead, a geographic criterion was added, i.e., the selected cases should represent the different regions in which Finland is active as a donor. Furthermore, the cases should reflect different thematic agendas of Finland's influencing agenda. The application of these criteria led to the following sample.

Table 10 Country Case Studies

CRITERION	NEPAL	UKRAINE	TANZANIA
Region	Asia	Neighbourhood	Africa
EU MS embassies (in addition to Finland)	2 (FR, DE, previously DK)	All, except Luxembourg, Croatia and Malta	10 (BE, DK, FR, DE, IRL, IT, NL, PL, ES, SW)
Donors involved in joint programming exercise	9 (DK, FIN, FR, DE, NL, NO, SW, CH, UK)	0	10 (BE, DK, FIN, FR, DE, IRL, NL, ES, SW, UK)
Thematic criteria	First case of EU Delegated Cooperation for Finland Strong focus on WASH, climate resilience, gender equality and education	Strong focus on energy security, climate resilience, trade and education	Prominent Finnish involvement in joint programming. Strong focus on taxation and trade/economic cooperation, forest-based livelihoods, and climate resilience

Source: Evaluation team, (EU, 2022a, p. 4)

As explained above the security situation in Ukraine meant many of the desired interviewees were no longer available and the case study had to be reduced to a 'mini-case' even though this meant there was no real scope to verify evidence from the few interviews held. This was deemed preferable partly because it was also too late to identify an alternative case. The choices were discussed with the MFA and the Embassy before work started on the case.

Process cases and Finnish thematic priorities

A number of prominent policy debates and negotiation processes took place in the EU during the evaluation period. These provide opportunities for influencing. As many of these can be identified in advance it is also possible to plan ahead for them (e.g., preparation of the next MFF including the negotiation of the NDICI-GE). Others are not predictable, and it is rather a question of reacting to them and using them as an opportunity for influencing (e.g., COVID-19 response). As indicated above three such processes were selected for a closer process assessment:

- The Finnish EU Presidency in 2019;
- The negotiation of the NDICI-GE single instrument; and
- The EU response to COVID-19.

The result of this analysis was summarised in three concise briefs (~2-4 pages) in Volume 2 to the report and highlighted in appropriate places in the main text using text boxes. These three



processes inevitably played out differently in the partner countries from Brussels and some flexibility was therefore needed to be shown in the country cases.

The MFA also has a number of thematic priorities (gender equality, governance & human rights, disability, education, climate and COVID-19). The team analysed how prominently these emerged as cross-cutting objectives in Finland's EU influencing work. Data collected was again summarised in concise briefs (~2-4 pages) that are annexed in Volume 2. The brief on COVID-19 deals with the subject both as a process and a Finnish thematic priority.

Risks, limitations and mitigating measures

The following table summarises the assumptions, risks and mitigating actions.

Table 11 Risks encountered and mitigation strategies

RISK (LIKELINESS)	POTENTIAL IMPACT (LIMITATIONS)	MITIGATION STRATEGY	RESPONSIBILITY
Lack of institutional memory among both development partners & the government (high)	Weak evidence and difficulties to analyse evolutions	Some tracking of key interlocutors from the early years of the evaluation periods was done with the interviews conducted by video/telephone (e.g., staff who are now in different posts) or (if the COVID-19 situation allows) in Helsinki if they still work for the MFA. Information from previous studies/evaluations was also used where possible.	Team leader with team support
Positive bias in outcome harvesting	Difficulty of making generalisations based on a limited number of outcome stories	Extensive triangulation of findings was done with non-Finnish and where possible non-official interviewees Probing interview techniques were also used to establish where the level of 'overstating' the Finnish significance or intensity of influencing lay exactly as seen by the informants.	Team leader with team support
Limited meaningful engagement by stakeholders (low)	Lack of useful and constructive stakeholder feedback	Communication throughout, to ensure that opportunities for consultation and engagement are provided (communication from evaluation unit/the evaluation team as required), including consultation/opportunities for comment on the evaluation design, the emerging narrative (e.g., post-initial interviews) and the draft evaluation report/conclusions and recommendations. The survey responses from Finnish embassies in particular, required several reminders including from EVA-11.	Whole team backed up by MFA
Limited cooperation and information sharing by EU stakeholders in Brussels (medium)	Reduced data availability resulting in poor evidence	Data collection was planned in advance, making sure that the data solicited are properly provided. All partners were informed thoroughly on the objectives and benefits of proactively engaging in the evaluation.	Whole team backed up by MFA

Source : Evaluation team



Annex 4: Context

EU Context

General introduction

The European Union (EU) and its MS are the world's largest donors of development and humanitarian assistance, providing about 50% of global Official Development Assistance (ODA). Thus, development policy is a prominent part of the EU's external relations and the EU's role as an international actor.

As indicated in Figure 8 below, the EU donors consist of four major donors: Germany, France, the UK⁴⁷ and the EU itself. There are then ten medium-scale donors⁴⁸, including Finland shown in the graph. The remaining fifteen have small ODA budgets, which consist principally of their contributions to the ODA budget of the EU. The graph also shows how EU ODA rose dramatically in the 2000s to fulfil the commitments the EU group made at the 1st UN Conference on Financing for Development in Monterrey in 2002. Then, it suffered a setback after the 2008 financial crisis. However, ODA levels recovered again in subsequent years for the EU and many Member States.

In its 2020 Annual Report (EU, 2020) DG INTPA reported that in 2019, the EU and its MS provided EUR 75.2 billion (EU share EUR 13.2 billion) in ODA⁴⁹, which covers more than half (55.2%) of total global assistance.

Development cooperation is termed a 'shared competence' in the EU whereby EU MS continue with their bilateral programmes alongside the EU programme managed by the Commission. The EU Treaty stipulates in Art. 208 (EU, 2016) that the EU and its MS should coordinate and seek complementarity in running these parallel development programmes. In addition, the Treaty expects them to promote policy coherence between all their different policies (both internal and external to the EU) that could impact international development.

The MS, including Finland, jointly agree on the common practices and principles that guide the implementation of development policy by all EU MS. At the overall policy level, these were most recently agreed upon in the 2017 'European Consensus on Development' that incorporated the objectives of the 2030^oAgenda into EU development policy, thereby updating the earlier 2005 Consensus. Further, more detailed development policy commitments in specific areas are agreed upon from time to time by the Council after discussion in its working groups and based on proposals from the Commission.

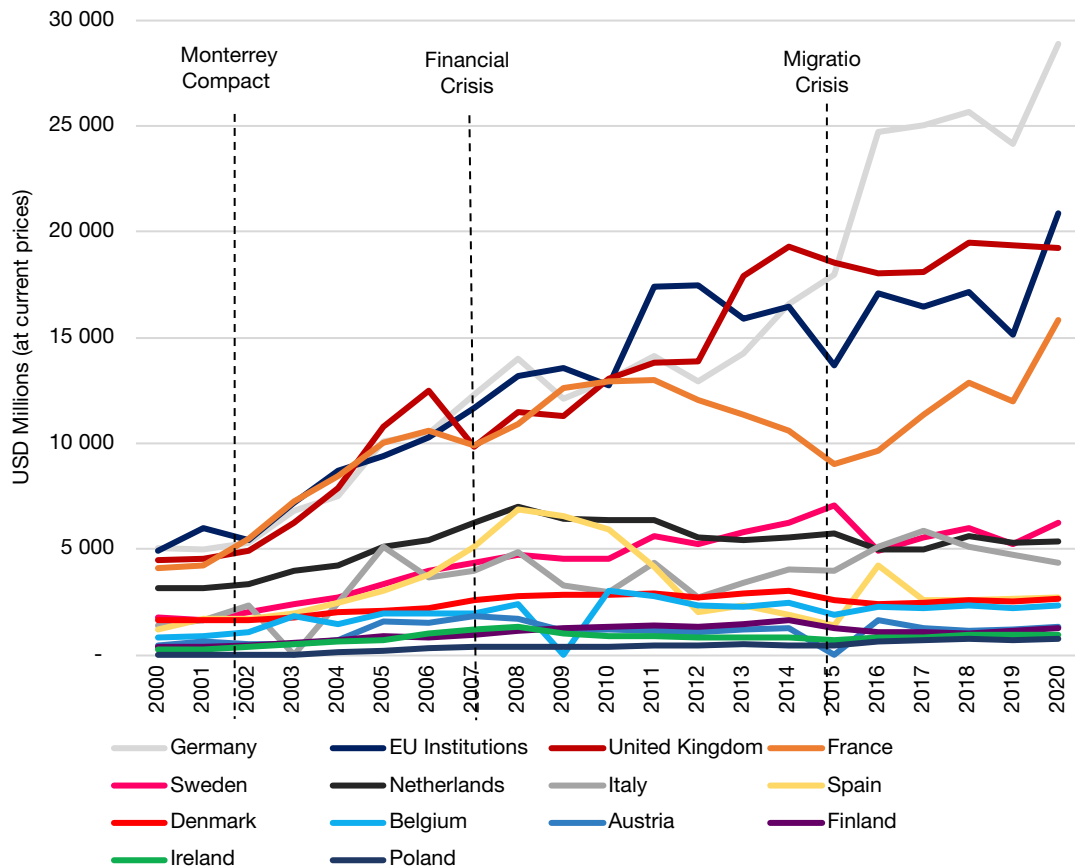
47 The UK left the EU in 2021 and therefore contributed to the full period of the EU 2014-2021 MFF.

48 10 medium-scale donors: Sweden, Netherlands, Italy, Spain, Denmark, Belgium, Austria, Finland, Ireland and Poland.

49 OECD ODA stats for 2019 record higher amounts in USD for EU as a whole: USD 80.5 billion; and EU institutions: 15.1 billion. For 2020 these had risen to: EU as a whole: USD 96.3 billion and EU institutions: USD 20.8 billion.



Figure 8 EU Member State's donor ODA volumes, 2000-2020



Source: Evaluation team, based on OECD Aid Statistics (data are only available in USD)

Financial framework

The EU budget or Multiannual Financial Framework (MFF), to which all the MS contribute, provide the funds for the EU development programme managed by the Commission. During the evaluation period, a first MFF covered the years 2014-2020, and a second one was negotiated and agreed upon for 2021-2027. Total external assistance of EUR 79.5 billion (current prices) (70.8 billion 2018 fixed prices) for the seven years available in the new MFF comes under one budget instrument, the NDICI-GE (Neighbourhood, Development and International Cooperation Instrument – Global Europe). In the previous MFF (2014-2020), the equivalent amount was slightly lower at EUR 69 billion, but it was spread over nine different instruments. These included the EDF, which traditionally stood outside the EU budget as the financial protocol to the ACP-EU Cotonou Partnership Agreement and its predecessors, the Lomé Conventions. The three main external assistance instruments of interest to this evaluation for the period 2014-2020 were (EC, 2013):

- The European Development Fund (EDF) (EUR 30,506 million),
- The Development Cooperation Instrument (DCI) (EUR 2,341 million), and
- The European Neighbourhood Instrument (ENI) (EUR 2,192 million).



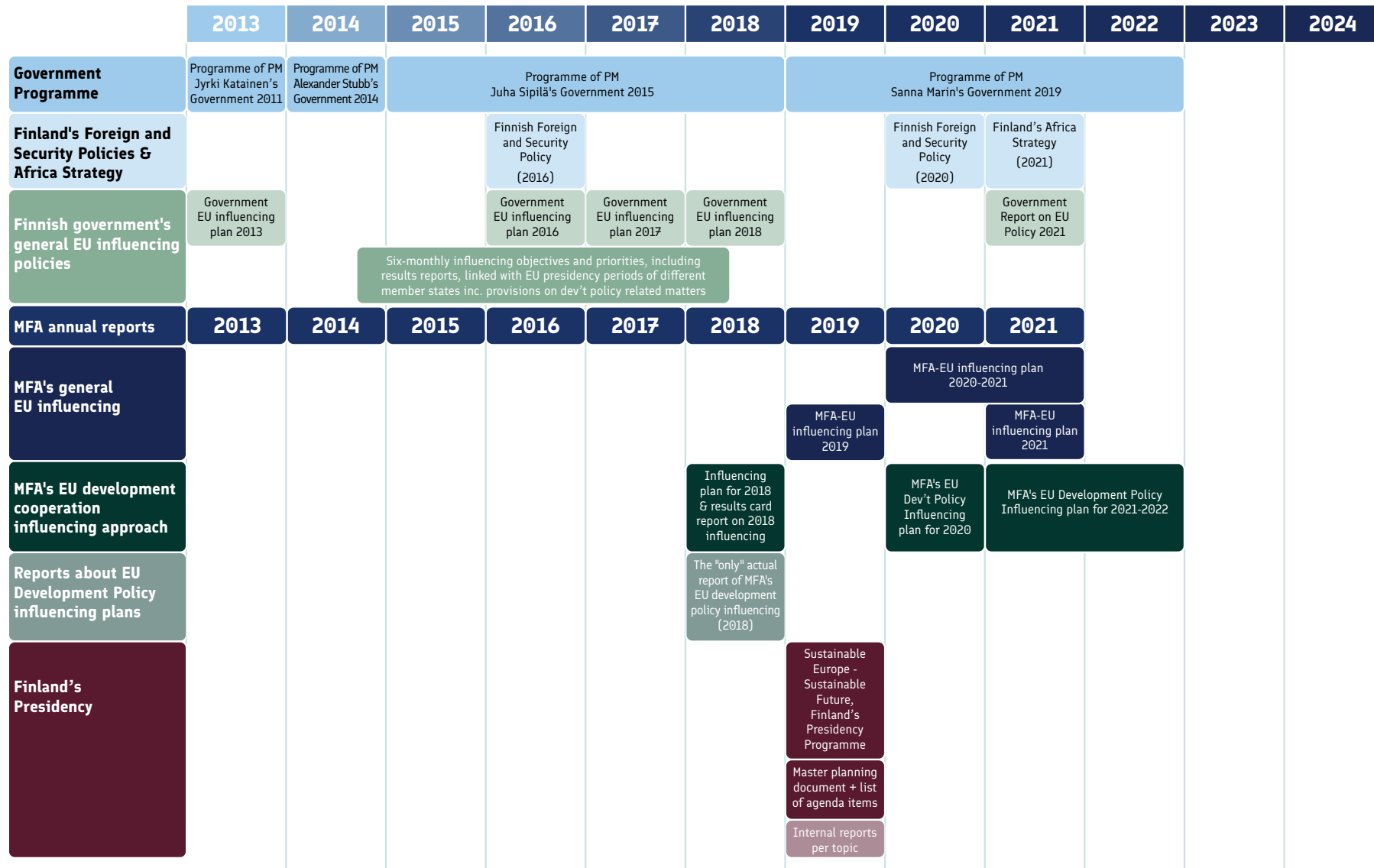
The EU's development funding is allocated through several funding modalities. Grants are direct financial contributions provided to organisations or projects carried out by them. Budget support aims to finance partner countries' development strategies and/or strengthen specific systems through direct financial support to national budgets. Blending combines EU grants with loans or equity from public and private financiers. In recent years, the use of the blending modality for achieving EU external policy objectives, complementary to other aid modalities and pursuing the relevant regional, national and overarching policy priorities, has increased.

Finland's EU influencing policies

It is important to note that although this evaluation is concerned only with influencing EU development policy, this takes place in a broader framework of general Finnish influencing the EU. The following sections describe the hierarchy, from Finland's government programmes to specific thematic policy papers. The layers are visualised in the form of two timelines encompassing policies covering MFA's EU development policy influencing: MFA's general EU influencing, and the entire government's EU influencing.



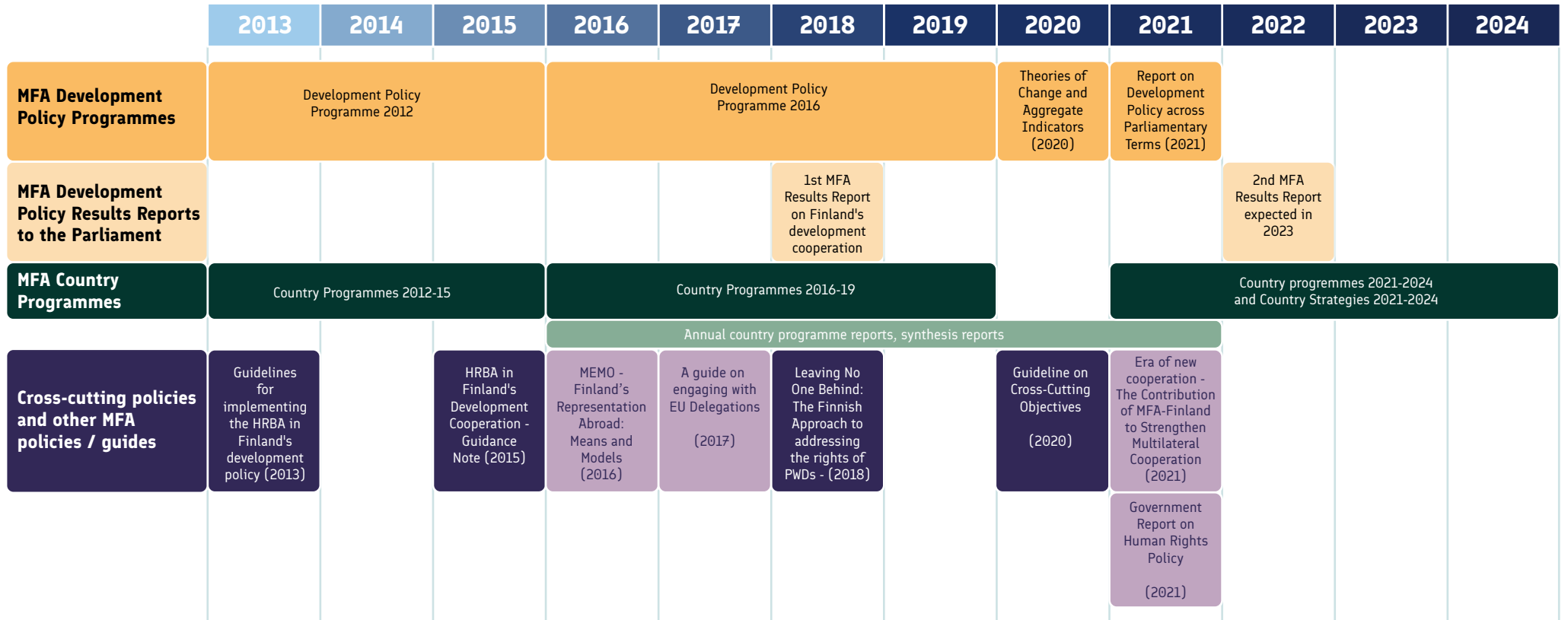
Figure 9 Timeline of Finland's EU influencing strategy documents and reports



Source: Evaluation team



Figure 10 Timeline of development policy and cooperation strategic documents and reports relevant to EU influencing



Source: Evaluation team



EU influencing policies at the level of the whole Finnish Government

The highest level framework outlining Finland's EU influencing policy is described in the Government Programmes (Finnish Government, 2014, 2015, 2019d). Similarly, the Finnish Foreign and Security Policies establish the general vision of Finland's relationship with external actors, including the EU and other multilateral configurations (MFA, 2018f).

The types of policy documents that define specific EU influencing objectives covering the entire Government have varied over the years. In 2013 and from 2016 to 2018, the Government published annual EU Policies (Finnish Government, 2013, 2016a, 2016b, 2017). However, in 2014-2015, the plans were based on the Presidency of the Council of the EU of different MS. Thus, the scope of each strategy was only six months. The contents were formulated at the MFA and shared with other ministries. At the end of each period, the MFA would prepare a brief internal report of influencing achievements. In 2019 and 2020, no updates to these plans were announced. The current government-wide EU influencing policy is titled 'Government Report on EU Policy 2021: Strong and united EU – towards a more sustainable European Union' (Finnish Government, 2021a). The document was launched in 2021 and is expected to remain valid for several years.

Finland's Africa Strategy is another recent policy document that includes provisions on Finland's approach to dealing with the EU in the context of the Union's external relations (Finnish Government, 2021b).

MFA's EU influencing policies

The MFA's general policies, operational plans, and budgets are described in the Strategic Priorities of the Foreign Service (MFA, 2018f) and the Operation and Budget Plans (*toiminta- ja taloussuunnitelma*, TTS) (MFA, 2022f). They are consistent with the higher-level government-wide policies; Finland's vision is to support security and wellbeing, a rules-based international system, free trade, human rights, equality, democracy, and the SDGs.

MFA's Annual Financial Reports (*tilinpäätös*) (MFA, 2022e) include brief accounts of the Ministry's achievements against the targets defined in budget implementation documents (*talousarvion toimeenpanoasiakirjat*) (MFA, 2022d).

In addition, MFA has formulated more specific EU influencing plans for 2019, 2020-2021, and 2022. These are brief documents that outline priorities across different lines of action, as summarised below. The EU Influencing Plan in 2019, which was the year of the Finnish EU Presidency, listed seven specific EU external action areas for influencing:

1. Developing the EU's role as a provider of security;
2. Promoting stability in the EU neighbourhood;
3. Strengthening Arctic policy in the EU;
4. Managing migration and influencing the underlying causes;
5. Strengthening an open and rules-based trading system;
6. Strengthening the EU-Africa partnership;
7. Effective implementation of EU development policy as part of external relations.



However, the 2020-2021 and the 2022 EU influencing plans were less focused than their predecessor as listed below:

MFA's EU influencing plan for 2020-2021

1. EU's influence externally;
2. EU's partnerships;
3. EU's resilience, recovery, and trade;
4. EU's values;
5. Commissions work programme 2021 and Finland's influence on its critical external affairs;
6. Guiding practices and monitoring.

MFA's EU influencing plan for 2022

1. EU's external capability and values;
2. EU's strategic autonomy;
3. Qualified majority voting in the area of the common foreign and security policy;
4. The use of the deputies of the EU High Representative;
5. Sanctions policy;
6. The strategic compass;
7. EU's external financing tools;
8. EU's effectiveness in external relations and attractiveness as a contracting partner;
9. EU's global trade policy;
10. Finnish companies' involvement in business opportunities;
11. Global rules and technology standards for digitalisation and data use, including trade agreements;
12. EU's climate policy;
13. Strong and diversified relations with key partners bilaterally and multilaterally;
14. EU's accession to the European Human Rights Convention;
15. Gender equality in external relations;
16. EU approach to migration;
17. Finnish experts in EU institutions;
18. Finland's embassy network supporting EU influence;
19. EU's future foresight work.



Finland's development policy

Finland's approach to influencing EU development policy and cooperation is rooted in its development policy priorities. For the evaluation period, these are outlined in two **Development Policy Programmes** from **2012** and **2016**, of which the latter is key as it covers most of the evaluation period. The 2016 programme explains that the SDGs guide Finland's development policy, and its core goal is poverty eradication. It also identifies four priority areas: (i) the rights of women and girls, (ii) partner country economies generating jobs, livelihood opportunities and well-being, (iii) partner country societies becoming more democratic and better functioning, and (iv) food security, access to water, energy and natural resources are used sustainably.

Furthermore, the 2016 Development Policy Programme underlines the importance for Finland of membership in the EU and the objective it has to influence the EU's policies:

- *“Within the European Union, Finland influences development policy decisions and promotes the principle that the consequences of EU action for developing countries be considered more broadly. EU decisions and agreements in fields such as taxation, trade and agriculture ... carry major immediate or indirect consequences for developing countries.” (p.28)*
- *“Finland works actively to promote the realisation of its development policy goals through EU action. As a member of the EU, Finland influences the future of international development policy and participates in the formulation of development cooperation all over the world.” (pp.30-31)*

The new government, in power since June 2019, endorsed the development policy framework created by its predecessor prompting the MFA to publish a document titled 'Theories of Change and Aggregate Indicators for Finland's Development Policy 2020' (MFA, 2020d). This document draws together the work implemented from 2016 through 2019 on defining the activities, outputs, outcomes, and impacts of the four policy priority areas (Priority Area 1: Rights of Women and Girls; Priority Area 2: Sustainable economies and decent work; Priority Area 3: Education and peaceful democratic societies; Priority Area 4: Climate and natural resources), including their corresponding indicators.

The gist of the 2016 Development policy Programme was placed in a long-term context with the formulation of the 'Report on Development Policy Extending Across Parliamentary Terms' (MFA, 2021c). The strategy aims to consolidate the longstanding nature and coherence of Finland's development policy and coordination.

Furthermore, in parallel with the clarification of Finland's Development Policy Programme 2016, the MFA also developed a 'Guideline for the Cross-Cutting Objectives in 2020' (MFA, 2020b). While gender equality, reduction of inequalities, and climate change have been cross-cutting objectives for Finland over the years, the new Guideline provides a more specific definition of the themes.

The cross-cutting objectives defined in 2020 are (i) gender equality, (ii) non-discrimination with a focus on persons with disabilities, and (iii) climate resilience and low emission development. In addition, in this evaluation, we broadened the third priority to encompass topics broadly under the concept of climate change. This thematic area can also include the recent prioritisation given to 'Building Back Better and Greener' as linked to the COVID-19 response. The reasoning behind the



approach is to ensure that the analysis widely captures valuable information and lessons learnt that can guide the MFA in its future work.

MFA objectives for EU development policy influencing

This section describes the evaluation's most critical policy references: the MFA's EU development policy influencing strategies.

In 2018, the MFA prepared its first EU development policy influencing plan. The narrative description of the objectives was accompanied by a results matrix. Subsequently, MFA formulated updates to the influencing plan in the following years in 2020 and 2021-2022. The influencing priorities of those plans are summarised below.

The MFA 2018 influencing plan on EU development policy covers the period until 2030, when the UN Agenda^o2030 ends. The long-term change objectives at the organisation level were defined as follows:

- *The EU and the Member States will implement the 2030 Agenda on Sustainable Development Goals (SDGs) comprehensively and strategically in development policy by combining the three dimensions of sustainable development in a balanced and coherent way, and*
- *The EU and the Member States apply the principle of policy coherence in support of sustainable development and consider the objectives of development cooperation in all their internal and external policies that may affect developing countries.*

More immediately and concerning the EU objectives, Finland aimed to exert influence to the effect that at least the current level of EU ODA is maintained in the new EU Budget (MFF 2021-27), and an ODA commitment is included in the regulation of the new NDICI-Global Europe financing instrument and the conclusions of the European Council.

Finland also planned to support the European Commission's proposal for the future multiannual financial framework to include a commitment to unified financing for development under the NDICI to enable flexible and cost-efficient channelling of funds towards the least developed countries. Finland aimed to influence the Commission's proposal for NDICI to include a commitment to poverty reduction as the main objective of EU development policy and an earmarked allocation for least developed countries.

Moreover, Finland has consistently promoted increased funding for SRHR and intends to continue with this influencing agenda in the future. In addition, in the Finnish view, a more significant share should be allocated to the fight against climate change. Finland also prioritised the Post-Cotonou EU-ACP (African Caribbean Pacific) relations to align with Finland's negotiating objectives. They highlight the focus on Africa, least developed countries and fragile countries, without limiting it only to ACP countries and with the inclusion of human rights and equality. Last but not least, Finland has promoted the recruitment of Finns in the EU as well as procurement from Finland. However, there has been a decrease in interest among Finnish professionals.



In terms of influencing objectives on organisational efficiency, Finland's long-term priorities were that the Commission DGs would jointly implement Agenda 2030 in line with sustainable development policy coherence. In this context, the more immediate targets were:

- Coordination and communication between DGs have been strengthened in the spirit of Agenda 2030;
- The Commission's reflection paper contains a comprehensive analysis of the achievement of the SDGs in the EU.

The Ministry published two updates to its influencing plan a few years later (2020 and 2020-2021). The 2020 plan includes the following items:

- Finland supports the Commission's strong emphasis on Africa.
- The EU's global COVID-19 pandemic response: Support the EU's comprehensive Team Europe approach. Still, the recovery should be based on the sustainable and inclusive principle of 'Building Back Better and Greener'. Specifically, Finland's EU development policy priorities guide the response which should pay particular attention to gender equality, SRHR, climate action, and education.

Other priority processes and thematic priorities for Finland to follow up on include:

- **NDICI-Global Europe negotiations.** Flexible solutions that increase coherence; geographical focus on the EU neighbourhood, Africa, least developed countries and fragile states; human rights (including SRHR); high level of ambition on climate change; flexible migration management based on positive incentives; European Fund for Sustainable Development (EFSD+) to also support small and medium-sized financial institutions and including forestry as an eligible sector.
- **The EU's future development finance architecture.** A more efficient and comprehensive strategic vision; division of labour between the EIB and the European Bank for Reconstruction and Development (EBRD); implementation of the recommendations made by the Wise Person's Group; participation of Finnfund in EU cooperation.
- **Post-Cotonou negotiations.** Adequate MS consultation; coherence of the Africa pillar with other objectives agreed with Africa.
- **EU development cooperation programming** (including country-level MIPs). MS involvement throughout the process; TEs included strategically, on time and flexibly; gender equality (mainstreaming and targeted actions); climate resilience and environmental sustainability; human rights in private sector cooperation; triple nexus between humanitarian aid, development and peace building; keeping Finnish embassies informed and engaged.
- **Joint programming.** Contribute where possible without losing Finland's own bilateral programmes.
- **Green Deal.** No specific objectives, except an acknowledgement of the external action implications.



Finland's priorities in terms of influencing EU organisational efficiency were:

- Smooth coordination and collaboration between EEAS and the European Commission.
- Timely and transparent consultation of MS by relevant EU institutions.
- Strengthening the work of development ministers of the Foreign Affairs Council.
- Possibility to place Finnish expert(s) in either DG INTPA or EEAS to support with influencing.

MFAs' priorities in influencing the EU's development policy in 2020-2021 included:

- **Africa.** Support the EU's focus on Africa, emphasising Africa's young population, African integration, peace and security, the green and digital transition, SRHR, democracy and the rule of law.
- **COVID-19 response.** Support to the Team Europe approach; availability of COVID-19 vaccines; Building Back Better and Greener approach in the recovery; strategic partnership with Africa; cooperation with UN organisations; support to crisis resilience of EU's partner countries in the health sector (including SRHR); differentiated impacts on men and women, including people with disabilities.
- **Gender equality and SRHR.** Strengthen access for all women and girls to high-quality and non-discriminatory SRHR services; address violence and exploitation, including in digital environments; right of women and girls to their bodies; strengthen SRHR language; alignment with the 2017 European Consensus; promotion of the EU Gender Action Plan (GAP III); gender mainstreaming, gender transformative approach, women and girls with disabilities; intersectional approach; sufficient financial allocations in SRHR.
- **Climate action.** Addressing biodiversity loss alongside climate change, including mainstreaming activities; stepping up climate diplomacy; influencing non-EU G20 countries; supporting least developed countries and small island developing states in adaptation to climate change; the link between climate change and human rights.
- **Education.** Strengthening the strategic approach and impact of education cooperation overall with a focus on low income countries, basic and secondary education (including vocational training); support to key funds and partnerships (GPE, Education Cannot Wait (ECW) and SDG 4 coordination mechanism); prioritising girls and the most vulnerable children and young people, including the disabled; school meals; high-quality programming by placing three national experts in DG INTPA, the EU delegations in Addis Ababa and Abuja; linking Team Finland actors in the education sector to TEIs and EU programming; teacher training; EU education summit planning and implementation.
- Finally, key EU processes that were in focus for Finland in the 2020-2021 influencing plan were the NDICI-Global Europe, EU development cooperation with Afghanistan, EU development finance architecture and its different components, Post-Cotonou negotiations, joint programming and the TEIs.



The **MFA's EU influencing priorities 2020-2021 on refugees and migration** suggest that the root causes of migration include social, political, economic, cultural and environmental conditions. COVID-19 has harmed the status of migrants and refugees. Climate-related migration is also expected to increase, and related disasters are already the leading cause of migration. Development policy is part of Finland's human rights-based foreign and security policy; the aim is to promote human rights for everyone, including migrants. Finland's development cooperation focuses on its four priority areas, which influence the root causes of migration. In addition, Finland's humanitarian assistance and the Finnish cross-cutting objectives play an important role. A comprehensive and long-term partnership with countries of origin and transit (through development cooperation), as well as strong European and multilateral collaboration, is seen to bring the best results. For the other countries, the focus is on preventive actions.

Finland's EU influencing at the country-level

Influencing the EU takes place also at the country level, especially, in the locations where Finland has established an embassy. MFA publishes country programmes for development cooperation (earlier called country strategies) in Finland's long-term partner countries. Since 2020, more comprehensive country strategies involving sectors also beyond development cooperation and country programmes have been defined separately.

The country context provides a different context for influencing the EU than the Brussels/EU capitals context. The number of EU players (EUD and MS embassies) is generally smaller, the personal connections between all the heads of mission, heads of cooperation and sector specialists are more direct and frequent, and their daily concerns both more operational and more political vis-à-vis a single interlocuter, the partner government. In such circumstances, influencing works more directly and regularly in often intense day-to-day debates. Of course, the work of embassies and EUDs is set within frameworks provided by headquarters that make them more limited in scope. At the same time, debates occurring in-country often feedback to headquarters, bringing valuable lessons learnt from challenging experiences to bear on overall policy frameworks and strategies.

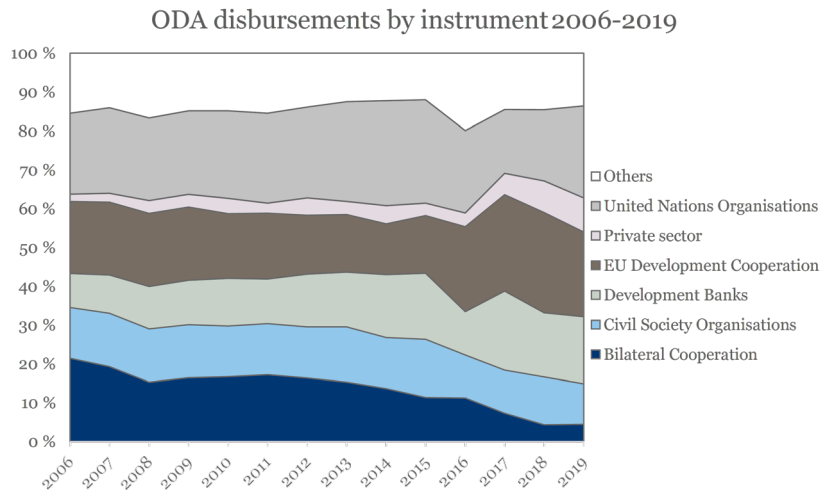
However, the MFA's country strategy and country programme formulation guidelines/templates and the internal call-to-action to develop these strategic documents, and reporting templates, mention EU influencing only briefly or not at all. A 'Guide on Engaging with EU Delegations – An overview prepared for Finland' was developed in 2017 (ecdpm, 2017). Yet, the practical implications of the report do not seem to have been translated into MFA internal guidance documents.

Finland's financial contributions to the EU's ODA budget

Of Finland's total ODA, EUR 223 million were allocated through EU institutions (22 % of total Finnish ODA) in 2019. Figure 11 shows the trends in the allocation of Finland's ODA funding between 2006-2019 and how it is shared out between major uses. The shares to the UN organisations and to the EU are roughly equivalent and both considerably larger than the share spent on Finland's own bilateral cooperation.



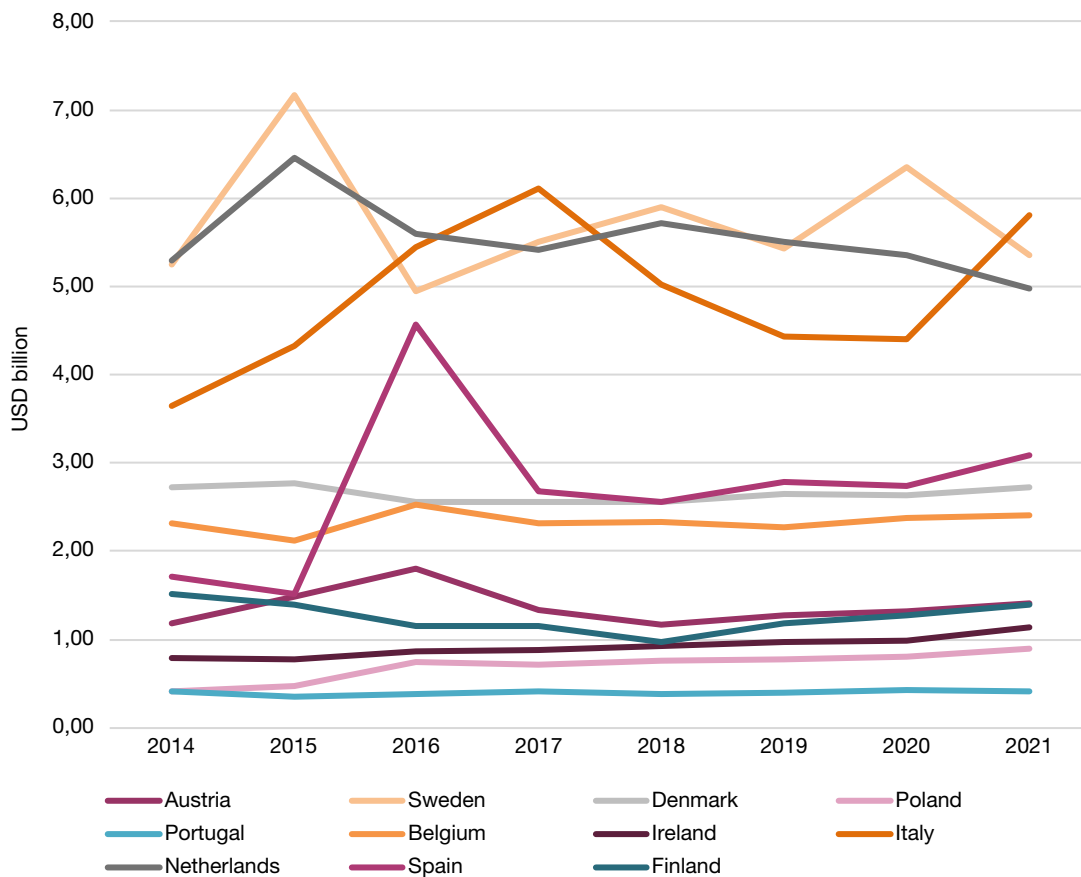
Figure 11 Finland's ODA disbursements by instrument 2006-2019



Source: MFA Statistics team, 2021; KEPO-KYT training

Figure 12 shows how Finnish ODA levels compare with other EU MS. Finland belongs to a group of about a dozen EU states contributing between USD 1 and 5 billion in ODA per annum during the period covered by the evaluation.

Figure 12 Medium EU MS donor ODA volume, 2014-2021



Source: Evaluation team, based on OECD Aid Statistics (data are only available in USD)



As can be seen, the ODA levels of many EU MS, including Finland, have varied over the years. Events such as the 2008 financial crisis and the 2015 influx of refugees and migrants to the EU have impacted ODA levels differently (see also Figure 8). The EU Member States closest to Finland in ODA volume terms are Poland, Ireland and Austria.

On the other hand, looking at other measures of ODA performance, these three countries vary widely on a per capita ODA level. For example, Ireland has a population similar to Finland, whereas Austria and Poland have considerably more inhabitants. In relation to economic performance, Finland has the highest ODA/GNI rate (0.47% in 2020) of the four. On the other hand, Ireland and Austria have similar rates (0.32% and 0.30%), and Poland has the lowest (0,14%) (OECD, 2022).

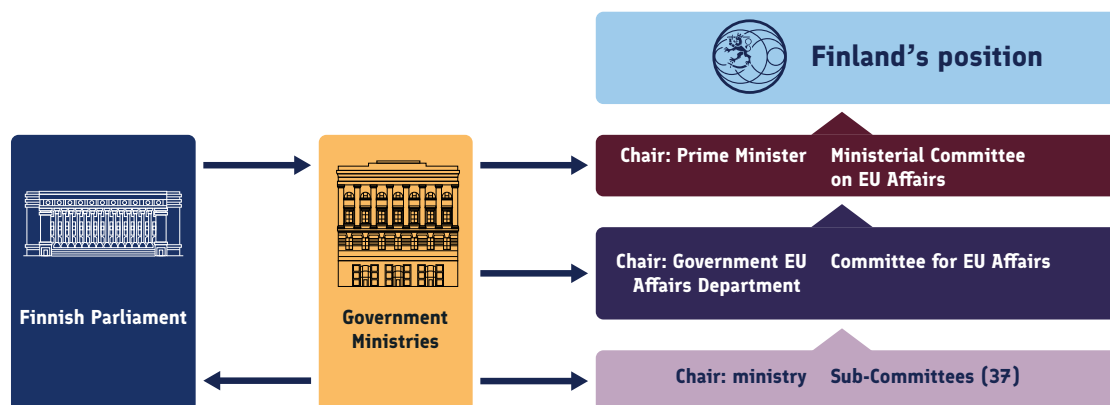
Finland's internal coordination on general EU matters

The main responsibility for monitoring and preparing EU issues and defining Finland's positions lies with the competent ministries. The purpose of the EU coordination system is to ensure that Finland has a coordinated position on all pending EU issues at the various stages of their processing, in line with Finland's general EU policy guidelines (MFA, 2022a). In addition to several units at the MFA (EUR-20, POL-30, KEO-10, KPO-10 and regional departments), Finland's Permanent Representation to the EU in Brussels (EUE or Perm Rep) and Finnish embassies in partner countries, the following Finnish governmental bodies are also part of the coordination on general EU matters (i.e., not only external action):

- Under the Prime Minister's Office, the Government's EU Affairs Department (VNEUS) (Finland's overall EU policy coordination, European Council);
- The Committee for EU Affairs and its Sub-Committees (chaired by the State Secretary for EU Affairs who is also the head of the Government EU Affairs Department);
- The Ministerial Committee on European Union Affairs (chaired by the Prime Minister);
- The Development Policy Committee (KPT);
- The Finnish Parliament.

The detailed roles and responsibilities of each entity are described below. Figure 13 shows how the different entities relate to each other in the process.

Figure 13 Finland's internal mechanism of EU affairs coordination



Source: Evaluation team, adapted from MFA (2022b)



- Finland's system for coordinating EU affairs consists of relevant ministries, sub-committees, the Committee for EU Affairs and the Ministerial Committee on European Union Affairs. In addition, Finland's Permanent Representation to the European Union in Brussels also participates in the preparation of EU affairs. The relevant entities are:
- The **Committee for EU Affairs** is a cooperation body with representatives from ministries, the Office of the President of the Republic, the Office of the Chancellor of Justice, the Bank of Finland and the Government of Åland. It discusses broad EU issues that involve several ministries, such as the Government's annual key EU policy priorities. The Committee also makes decisions on Finland's national experts seconded to EU institutions. The Committee for EU Affairs is chaired by the State Secretary for EU Affairs, also the head of the Government EU Affairs Department. In addition, the Committee for EU Affairs has appointed 37 sector-specific preparative sub-committees. The sub-committees constitute the foundation for preparing EU affairs at the public servant level. The chairperson and secretary of each EU sub-committee usually represent the competent Ministry.
- The **Ministerial Committee on European Union Affairs** meets weekly to discuss politically, economically and legally important EU matters. The Ministerial Committee agrees on all Finland's EU policy guidelines for the formal and informal meetings of the Council of the European Union. The Prime Minister chairs the Ministerial Committee. The chairman of the Government of Åland has the right to be heard by the Ministerial Committee on European Union Affairs when the matter is within the jurisdiction of the Åland Islands or is otherwise of special importance to the region.
- The **Unit for Development Policy** (KEO-10) at the Ministry for Foreign Affairs is primarily responsible for preparative work and coordination of the national positions related to EU development policy and information about these to Parliament. A development policy influencing plan for 2020 was prepared by the unit. Other departments and units of the Ministry are also involved in the EU affairs.
- The **Unit for General EU Affairs and Coordination** (EUR-20) is responsible for general EU affairs, including the development of the EU and institutional issues, preparative work related to COREPER II and participating in the preparations of the Foreign Affairs Council (FAC) and the European Council. It is responsible for the internal coordination of horizontal EU issues within the Ministry, including financing of the external action of the EU and thus had a coordinating role in the NDICI negotiations.
- The **Unit for European Common Foreign and Security Policy** (POL-30) is responsible for participating in the preparation of the EU's Common Foreign and Security Policy and coordinating matters related to it in the Ministry and the national preparation process. In addition, it conducts preparations for the EU Foreign Affairs Council (FAC) meetings and coordinates the guidance given by the EU Political and Security Committee (COPS/PSC) and the Working Party of Foreign Relations Counsellors (RELEX). The unit also handles preparations for political consultations with EU Member States, informing the Finnish Parliament on matters concerning the EU's Common Foreign and Security Policy.
- The **Trade Policy Unit** (KPO-10) is responsible for preparing and coordinating EU trade policy issues. Coordinating matters related to the Foreign Affairs Council (FAC/Development cooperation) is shared between KEO-10 and POL-30. Similarly, the coordination responsibilities for FAC/Trade are shared by TUO-10 and POL-30. As the result of organisational reform, the TUO-10 is nowadays titled KPO-10. The new department is the Department for International Trade.



- **Under the Prime Minister's Office, the Government's EU Affairs Department (VNEUS)** is responsible for the general coordination of Finland's EU policy, including COREPER and the European Council. It coordinates matters related to the EU and ensures the proper functioning of the coordination system.
- The **regional departments** are responsible for guiding the regional missions in political, development cooperation and commercial matters as well as the processing of EU external affairs. For example, in development cooperation matters related to country-specific EU programming, the regional departments guide the missions as necessary. The Department for Africa and the Middle East is also responsible for participation at the EDF committee (now NDCI-GE) meetings. The committee provides a final opinion on the EU's MIPs and Annual Action Plans.
- Finland's **Permanent Representation** to the EU in Brussels (EUE or Perm Rep) prepares issues to be decided by the Council of the EU based on instructions from the Government of Finland. Public servant committees play a prominent role in the preparation of issues, the most important of them being COREPER (Comité des Représentants Permanents) which consists of the MS' Permanent Representatives. COREPER is assisted by more than 150 working groups in which the MS are represented by experts deployed by the capital or the Permanent Representation. The working groups meet every week, and the Permanent Representation reports on the proceedings.
- The **Development Policy Committee**, outside the Ministry, is an advisory body appointed by the Government. Its members represent the parliamentary parties, interest groups, NGOs, and researchers. The Committee monitors and evaluates Finland's activities in policy areas that concern developing countries. Moreover, it assesses the quality and effectiveness of development cooperation and follows the level of official development cooperation appropriations. The Committee is also active in promoting debate on development issues in Finland.

Stakeholders of EU influencing

Influencing the EU's development cooperation and policy involves a complex network of actors. In the sphere of control at the centre, the primary leadership is with the **MFA's Department for Development Policy** (Unit for General Development Policy, KEO-10) and **Department for Europe** (Unit for General EU Affairs and Coordination, EUR-20). Other MFA departments are also involved in preparing Finland's positions on specific topics. The role of Finland's EU coordination system is more pronounced in issues that affect legal matters. However, on thematic issues that are typically discussed within networks of EU Commission's and MS' technical advisers, internal debate among Finnish stakeholders plays a more minor role.

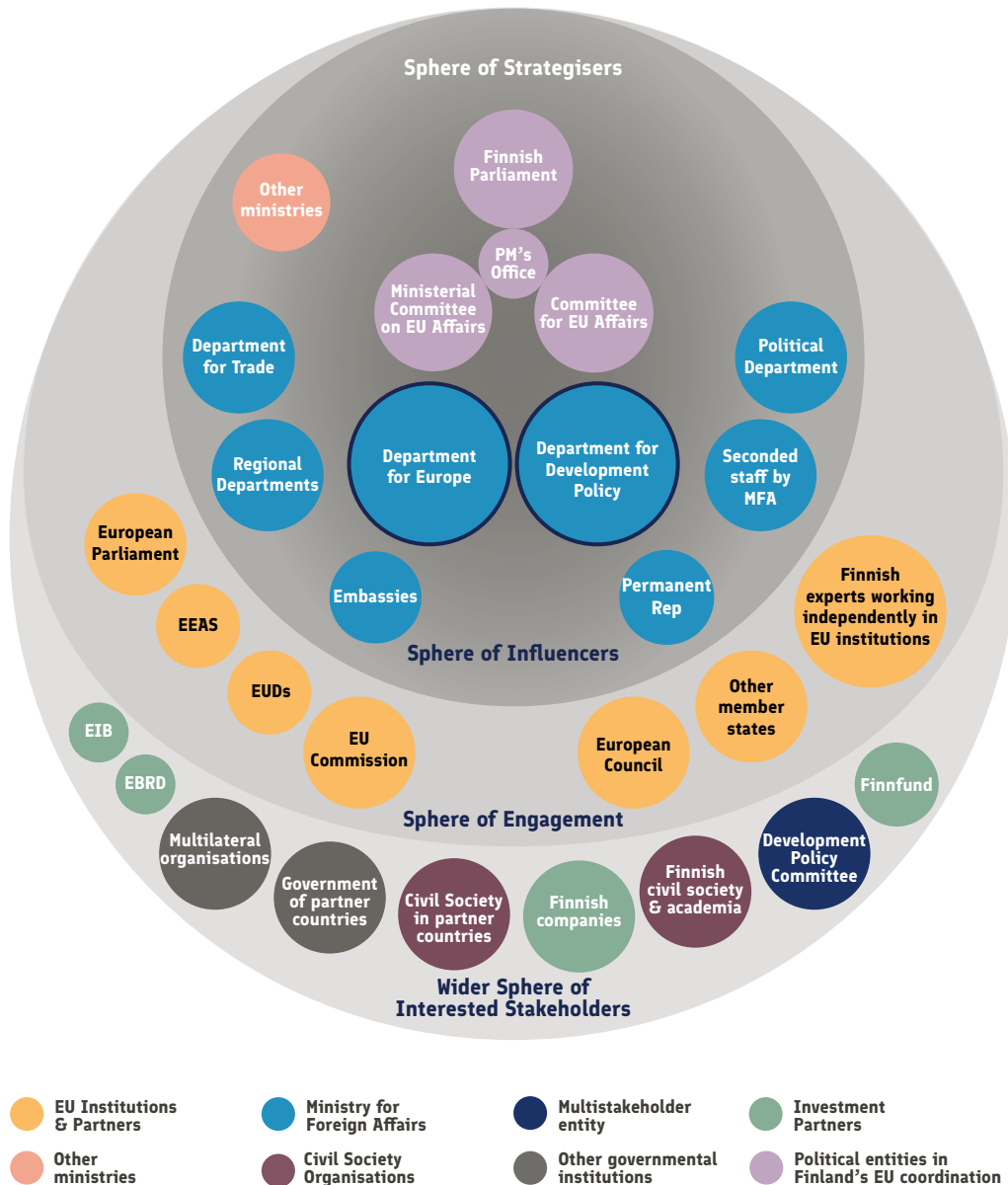
Those who carry out concrete influencing work in contact with other MS and EU institutions include officials from MFA headquarters, staff seconded to EU institutions and representatives of other ministries. At the country level, personnel of Finnish embassies liaise with EU Delegations. In Brussels, Finland's Perm Rep to the EU is in contact with the EU institutions and other MS Perm Reps.

The main objects of influencing in EU's development cooperation and policy are the EU Commission and the EU Delegations in partner countries. Other MS can be considered either allies or targets of advocacy, depending on the topic and situation.



The broader sphere of interest involves Finnish, European, and other private, public and civil society institutions. Figure 14 illustrates the spheres and actors related to influencing the EU's development cooperation and policy.

Figure 14 Stakeholder map of influencing EU's development cooperation and policy



Source: developed by the evaluation team

Decision making in the EU system

In simplified terms EU decision making works on the basis that the Commission has the right of initiative in proposing new policy and legislation, but the MS through the Council and the Parliament decide. Procedures vary from one policy area to another depending on whether the 'competence' for that area has been transferred to the Commission (e.g., trade or agriculture) or retained by the



MS (e.g., foreign policy). Where actual legislation is involved all three institutions must agree. For the EU budget the Council and the Parliament have the final say.

As development cooperation is an area of 'shared competence' in the EU (meaning that both the Commission and the individual MS can run their own cooperation programmes in parallel), decisions in this area are very rarely legally binding, unless they have links with the EU budget which requires formal legislation. Parliament is involved with comments on development policy proposals and for approving high level policy documents such as the 2017 Consensus. Equally as part of its approval of the EU budget, Parliament and MS had to approve the NDICI-GE regulation which is a legal document giving the Commission authority to spend the budget in particular ways.

The Council, made up of 27 Member States, reaches common positions by extensive preparatory work in more than 150 working parties (of which 28 in the area of foreign affairs) where policy proposals are submitted by the Commission for discussion by the 27 Member States. This is the most important venue and target for influencing. However, Member States can also engage with Commission staff informally to exchange ideas while they are drafting proposals in the hope that their ideas will find their way into the proposals submitted to the working parties. Equally, it can be valuable to regularly engage informally with officials in the other EU institutions and Member States, so as to influence their thinking in preparation for times when formal decisions are required.

The more a particular proposal requires formal approval by all three institutions, the more work is involved in the preparation and the more significant the influencing required. Approval of the NDICI regulation as a legal document was thus one of the toughest EU decisions to be considered during the evaluation period.

Policy documents in the area of development cooperation are built on the foundation of the European Consensus for Development (2017). This is not a legally binding document, but because it is approved by all three institutions it carries considerable weight certainly for the Commission, but even for MS as it is the basis for ensuring that their bilateral programmes are complementary with each other and with the Commission, as they are enjoined to do in the Treaty (Art. 208, TFEU). Sector specific policy documents such as the EU Gender Action Plan are also not formally binding, but they serve as agreed guidance for the Commission and for MS, particularly when they have been approved by Council conclusions. Their value is largely moral however and a basis for peer group expectations and pressure among MS, as they cannot be enforced.

In seeking to influence EU policy, MS must therefore look at the nature of the topic, how it is seen by other MS and the EU institutions and consider what level of agreement or approval is being targeted in the EU system. Controversial topics will of course require more effort as will those that have to be approved by a larger number of instances. Proposals which seek to make substantial changes to already established policy (as laid out in the 2017 Consensus or subsequently agreed changes) will also require more influencing effort. As the EU works on the principle of *acquis communautaire*, each new policy proposal put on a Council working party table is an opportunity to take the level of agreement further (and 'higher'), but it is equally a moment of danger when existing policy is potentially re-opened for discussion and therefore backsliding becomes possible. Such moments are therefore both opportunities and challenges which carry risks.

Negotiating tactics can be used to obtain enough support. Examples, including from the Finnish Presidency, are presented in Box 14.



Box 14 Negotiating tactics at the Council: Illustrative examples

There are a number of ways that compromise solutions can be found if there are divergences over language in documents. In the drafting of the Council conclusions, MS commitment can be made stronger or weaker through a careful drafting:

- **The Council conclusions can make commitments on behalf of ‘the Council’, ‘the EU’ or ‘the EU and its MS’.** For example, commitment to SRHR in the Council conclusions on the GAP II Annual report (2019) is only referred to as the EU and not ‘the EU and its MS’. Similarly, the Council conclusions on Strengthening Team Europe’s commitment to Human Development (2021) (which include some reference to SRHR and LGBT) are mostly drafted on behalf of the Council, and not EU or EU and its MS.
- **The choice of words is also key.** During its EU Presidency, Finland successfully worked on a **compromise regarding the way in which the instrument will address migration**, by deleting the European Commission’s proposal for a 10% target and introducing as a term *“a flexible incitative approach with, as appropriate within this context, possible changes in allocation of funding”*. The 10% target was reintroduced at a later stage but also made indicative, and the formulation negotiated during Finnish Presidency was retained. A lot of negotiations on gender – including during the finalisation of the Gender Action Plan III – were also about wording, although a compromise solution could not be found on this occasion (see also Box 9).

Relevant evaluations and studies related to Finland’s EU influencing

MFA evaluations

This evaluation is not the first to assess Finnish influencing on development policy and cooperation. The ToR of the evaluation provide an overview of past analyses; these and other relevant reports are summarised below.

The most relevant prior MFA study for this assignment is the **Evaluation of the Finnish Development Policy Influencing Activities in Multilateral Organisations** (Palenberg et al., 2020). It found evidence of highly effective influencing by Finland and the MFA, reflecting a strong and conducive perception of Finland as a development partner and credible advocate in several key areas. In validating established good practices at the MFA, influencing effects were found not to be related to single activities but to ‘arcs of influence’, representing many different formal and informal influencing activities implemented together with Finland’s partners in a coordinated way over extended periods.

The evaluation analysed implementation effectiveness across four influencing channels: governance, financing, staff placements, and other interactions, leading to more detailed findings. The MFA’s approach to managing multilateral influencing based on influencing plans was found to have evolved in the right direction and led to benefits in terms of transparency, learning and reporting, but it had not impacted on how multilateral influencing was implemented in practice. Overall, the report states that Finland was particularly effective in coordinating and managing relationships with multilaterals at different levels, and in visible high-level advocacy for specific thematic issues.



However, it was also noted – and this was the main critical finding – that staff placements, as a channel for influencing multilateral organisations, had usually not been effective, except when placements were strategically targeted

The **Evaluation of Complementarity in Finland’s Development Policy and Cooperation** (Bäck & Bartholomew, 2014) provided the first evaluation of Finland’s role in the design and conduct of the EU’s development cooperation. According to the report, Finland has strongly engaged in strategic action as part of the EU (and OECD) development policies. Finland had been “*very active in the Paris Declaration and subsequent conferences, and in the shaping of the EU’s Code of Conduct on complementarity and division of labour*”. There is a wealth of interesting findings which, in some instances, can be used as quasi baseline data to show how Finland’s position and influence on EU development policy and cooperation have changed since 2013-14, the beginning of the temporal scope for this evaluation. For example, the report notes, “*Within the EU context, at partner country level, increasing difficulty was encountered in trying to reach consensus on how to deal with the unsatisfactory performance of developing countries benefiting from budget support and other programme-based approaches. This may explain, at least in part, why Finnish contributions to budget support have declined in recent years (see 4.2). In this context, it is also important to mention Finland’s position with regard to EU joint programming. On the EU’s development cooperation programme 2014-2020, the MFA confirmed Finland’s active commitment to joint programming, but also recognised that progress would be slow and uneven in different partner countries.*”

The **Development Policy Results Report** (MFA, 2018e) presents the results of Finland’s development policy and development cooperation that were reported between 2015 and 2018. It concludes that Finland and its partners were achieving the development policy objectives “*quite well*”. According to the report, Finland was generating positive results and contributing to global stability and wellbeing. It is noted that Finland’s development cooperation – which is fully aligned with the SDGs and the Agenda 2030 was most impactful when the financial support provided by Finland was combined with political dialogue, expertise and influencing efforts. This approach produced the most sustainable results, for example in the case of the support to national education systems and with regards to the promotion of equality, inclusion and non- discrimination. The opportunities to influence were to some extent determined by Finland’s funding share. Achieving results were found to be most challenging in regions where partnerships had been weakened by different kinds of instability and fragility.

The **Evaluation on Forced Displacement (FD) and Finnish Development Policy** (Zetter et al., 2019) finds, that “*In both European and international fora, Finland is seen as a strong and consistent advocate for human rights, humanitarian principles, gender equality and women’s empowerment, sexual and reproductive health and rights (SRHR) and disability. In the EU level, as part of the Nordic group, Finland is also perceived as vocal on issues related to stimulating local economies in developing countries, creating jobs, promoting democracy, governance and the rule of law, as well as supporting actions fostering food security*”. However, the evaluation also notes that “*On policy influence, although Finland is perceived as a reliable partner with well-established policy priorities – e.g., for women and girls, and disability and inclusion – on the whole it has not proactively influenced the development of strategies and policies for the nexus [Humanitarian-Development nexus] or FD in international fora.*”

The **Evaluation on Improvement of Women’s and Girls’ Rights in Finland’s Development Policy and Cooperation** (Rassmann et al., 2018) was supposed to consider Finland’s influencing of the EU, but finally, it was excluded as it would have been beyond the feasible scope of the



evaluation. The report nevertheless noted that the *“EU votes as a block in the UN; lobbying takes place within EU fora from 28 diverse national positions to agree on UN positions. While the EU vote carries a lot of weight it tends to be more conservative than many of its members would like it to be, since it has to be accepted by all 28 European countries and some such as Malta, Poland and Hungary have more conservative positions, according to various informants. One informant noted that the EU position held on to the commitment to SRHR, but achieved only limited success in supporting comprehensive sexuality education.”* This observation might be worth following up.

The assessment titled **From Reactivity to Resilience – Response of Finnish Development Policy and Cooperation to the COVID-19 Pandemic** (Laaksonen et al., 2022) studied MFA’s COVID-19 response to learn and improve the institution’s ability to adapt development policy and cooperation and humanitarian aid in crises situations. The assessment also describes Finland’s actions in the context of the EU, namely, the vaccine donations through the COVAX mechanism. The evaluators observed that Finland has been relatively visible in the platform. The study also touches upon the Team Europe approach and its initial steps. However, the evaluators brought up the downside of initiative; it might have created unrealistic expectations in partner countries.

Relevant studies by other Finnish institutions

The National Audit Office of Finland has carried out two assessments in the past years that have relevance to this evaluation.

The performance audit report **‘Preparation of EU affairs and coordination in the Government’** was published in 2016. The audit looked at how efficient Finland is at organising its EU influencing activities across the relevant institutions (VTV, 2016b). The auditors gave the following recommendations for improving the coordination system:

- The Government’s key EU objective document or EU strategy shall be so concrete and targeted that the objectives are reflected in practice in the management of EU projects and that the achievement of the objectives can be assessed retrospectively. The procedure whereby ministries define their own EU priorities each year and make them impact plans is justified to continue.
- Senior ministry officials shall commit themselves to the management of EU affairs, set priorities and monitor the achievement of the objectives. Senior officials must ensure that the Ministry’s internal coordination practices are effective and that sufficient resources are earmarked for the management of EU affairs. In those ministries where coordination is decentralised, it is necessary, in particular, to ensure the systematic and homogeneity of the preparation of EU affairs.
- Finland’s effective influence on EU decision-making – including in advance – requires that the Ministry’s top management and middle management also have active communication with their counterparts in the EU institutions and key MS.
- In EU projects that are important to Finland, a national impact assessment shall be prepared on the basis of the information available. The impact assessment shall be prepared in such a timely manner that the assessment data can be used for preliminary impact.
- Each Ministry shall encourage officials to gain experience in EU tasks such as the Union institution, the EU Agency or the Permanent Representation of Finland to the EU. The Ministry must plan in good time what kind of position the person who has acquired EU expertise will return to.



The follow-up report published three years after the audit, in 2019, gave a relatively positive overview of how the different ministries had picked up on the recommendations. The responses provided by the MFA concluded that, overall, the MFA is already implementing many of them and that no major changes are needed in the Ministry's internal systems (VTV, 2019).

VTV has also carried out an audit of Finland's multilateral development cooperation in 2017 (VTV, 2017). The assessment addressed only the MFA and found both strengths and weaknesses in the Ministry's operations. The auditors recommended that MFA should:

- Improve the coordination of development cooperation within the Ministry by better supporting influencing activities;
- Focus on a limited number of development objectives that are as clear and concrete as possible and measurable;
- Develop information systems in such a way that they can be used effectively to compile development cooperation results and to report and develop activities;
- Explore opportunities to use the information produced by organisations even more to support influencing work;
- Develop budgeting in such a way that overall funding for multilateral organisations is more transparent and that information on the allocation of funding and the distribution of funding to general funding and earmarked funding is better available.

The follow-up report published in 2020 concluded that the MFA has implemented the recommendations in an acceptable manner (VTV, 2020).

Similar Evaluations and Studies on other EU MS

Evaluations and studies of other EU MS' approaches to, and effects of, influencing EU development policy and cooperation are rare. Comprehensive reports only seem to exist in the cases of **Denmark** and particularly the **Netherlands**, both published in 2013. The report 'Together for a Better World: Strategic Framework for Denmark's participation in EU Development Cooperation' stresses that "*despite its size, Denmark is highly respected for its development cooperation and has good experience of exerting influence in the EU*". The exact reasons and explanations, however, are unknown as the full report is no longer publicly available. The Evaluation of Dutch involvement in EU development cooperation (1998-2012) credits the Netherlands for having taken the lead on starting the PCD network among the several EU MS. It also notes that the Dutch government successfully managed to influence the EU on its approach to budget support.

In addition, a small number of studies and academic papers shed some light on **France**, Austria and Belgium. Anne-Sophie Claeys (2004) finds that historically "*France has contributed largely to the formulation and implementation of European development cooperation policy. It did so through offering institutional models, people, funding, ideas and policies.*" For example, between 1958 and 1985, all Development Commissioners were French. For many decades France had been successful in transposing its bilateral positions within the EU approach to development, particularly in relations with Africa. However, in more recent times, the presence of France in the European debate on development cooperation has decreased, especially since the French Ministry



of Development Cooperation disappeared. The author concludes, “*Today the thought about development is Anglo Saxon*”.

In their paper on ‘Austrian development policy – from global to neighbourhood policy?’ Simon Lightfoot and Michael Obrovsky (2016) describe **Austria** as “*a fence sitter in EU development policy [...] There has [however] been some attempt to influence policy towards Western Balkans, a key strategic interest of Austria’s but only in conjunction with other states.*” The paper makes an interesting point about the link between influence and image. Austria has held a positive image amongst recipient states and is seen as a trusted donor, in part due to its foreign policy position of neutrality and non-alliance.

The ‘OECD Development Cooperation Peer Reviews: Belgium 2020’ shows that influence is not directly related to size. **Belgium** successfully managed to put “*one of its flagship thematic priorities on the European agenda: digital for development. Following its lead, 15 member states called for an ambitious European strategy, which resulted in a working document drafted by the European Commission and the European Council adopting recommendations to support digital for development. Belgium spearheaded the creation of the Digital for Development-Hub (D4D) EU-Africa, an initiative anchored in the new Joint Africa-EU Strategy and which aims to support digital transformation efforts in Africa by building on common expertise and networks.*”

An academic paper by Thilo Bodenstein, Jörg Faust, and Mark Furness (2017) includes some generally useful information about the scope for EU MS’ influencing of the EU. “*EU member governments have a direct say on policy at the EU level. Their most important forum is the biannual Development Council, an organ of the Council of Foreign Ministers. The Council of Foreign Ministers oversees policy proposals (‘Communications’) from the Commission and the European External Action Service (EEAS), and has the final say on their adoption. Member states can also influence EU-level policies through the various working groups and committees of the Development Council, which is known as the ‘comitology’ system. This way, they can influence the formulation of major policy initiatives like the Agenda for Change or joint programming, as well as specific initiatives including budget support, country strategies, EU contributions to trust funds or conditionality clauses. EU government implementation agencies, such as Germany’s GIZ and KfW, SNV from the Netherlands, Crown Agents from the UK and Expertise France, also look to influence policy at the EU level as well as in their own countries.*” Since Finland does not have a similar agency the scope for influencing may be reduced compared to some other MS. For example, the lack of an implementing agency in part explains why Finland has not yet played a major role in delegated cooperation.

There are two types of delegated cooperation: (i) Delegation Agreements (DAs) are funds entrusted by the European Commission to development cooperation entities from EU MS or other donors; and (ii) Transfer Agreements (TAs) are funds entrusted to the Commission by EU MS, other governments, organisations or public donors.

EU Evaluations

Since 2007, the EU has continuously commissioned independent ‘strategic evaluations’ of its development cooperation which “*analyse EU aid strategies from conception to implementation, assessing the results of EU funded activities. These evaluations are complex, covering several programmes and instruments over a significant period of time. They are conducted at several levels: country, region or sector; they can also assess the procedures and instruments EuropeAid*



uses to provide aid.⁵⁰ Since 2015, 48 strategic evaluation reports have been published which are all available online.⁵¹

Strategic evaluations usually also comprise some findings on the role of EU MS in complementing, promoting or influencing the EU development cooperation with the respective countries and regions and in relation to thematic agendas. Not all but many reports at least mention, and some elaborate on, the activities and initiative of EU MS. Of the 48 reports only four mention Finland, while, for example, Sweden is mentioned in almost all reports that include some information on MS (in various contexts).

The Evaluation of the EU's external action support to gender equality and women's and girls' empowerment (Watkins, et al., 2015) is the one with the most references to Finnish initiatives. The report highlights, inter alia, that in Mozambique's education sector, a joint monitoring mission by Finland and Italy led to recommendations and immediate action on gender-based violence. Finland is mentioned a total of 21 times in Volumes 1 and 2 of the report, which seems to reflect Finland's strong contributions to the gender equality agenda. However, this is dwarfed by Sweden's 217 appearances. Although a single evaluation cannot provide strong empirical evidence, the very comprehensive report – the most extensive the EU has ever commissioned on its development efforts related to gender equality – which comprises 18 country, regional and thematic case studies, suggests that evaluators did not perceive Finland as an opinion leader on the EU's gender-related development agenda in the time covered. In that period, this role was seemingly played by Sweden, Germany and France which are all covered in detail by the evaluation.

The Evaluation of the European Union's Regional Development Cooperation with Latin America, 2009-2017 (Caputo, et al., 2019) notes that there had been a varying degree of participation by EU MS in EU-Latin America policy exchanges on social equity, which limited the opportunities for sharing of experiences between EU and Latin America. The report mentions Finland's 'Housing First' project as one of only a few contributions by EU MS to the inter-regional cooperation agenda.

The Evaluation of EU regional-level support to Central Asia, 2007-2014 (Rao, et al., 2016) singles out Germany and Finland as the only EU MS that conducted regional-level interventions in Central Asia.

The Thematic evaluation of the EU support to environment and climate change in third countries, 2007-2013 (Buhl-Nielsen, et al., 2015) mentions Finland twice in passing, while Norway's initiatives received most attention, reflected by 10 references in the report.

Interestingly, the **External Evaluation of EU's Support to Conflict Prevention and Peacebuilding, 2013-2018** (Ball, et al., 2020) does not mention Finland at all – although this area features prominently on the Finnish development cooperation agenda – while Sweden's contributions are referred to in five instances. In a similar vein, despite Finland's strong engagement in East Africa, where Helsinki supports the promotion of regional trade, regional integration, and mediation, such initiatives go unnoticed in the **Evaluation of the EU's Cooperation with the Eastern Africa,**

50 https://ec.europa.eu/info/aid-development-cooperation-fundamental-rights/ensuring-aid-effectiveness/evaluation-development-cooperation-projects/strategic-evaluations-assessing-quality-eu-development-aid_en

51 https://ec.europa.eu/international-partnerships/strategic-evaluation-reports_en



Southern Africa and Indian Ocean region, 2008-2015 (Buhl-Nielsen, et al., 2017). By contrast, activities of Norway and Sweden are mentioned six times each.

Overall, it needs to be considered that Sweden, Norway, France and Germany have much larger development cooperation budgets, portfolios and resources than Finland.

Research on small states

The Evaluation of Finnish influencing in multilateral organisations does an extensive literature review on influencing and leadership from which the authors derive a series of concepts and definitions some of which we refer to above. One useful addition to the MO evaluation literature review however is to consider academic work on Small State Theory, because it addresses the position of Finland as one of the small to medium MS in the EU and considers what this means for the country's position and international influence. Proponents of this theory argue that small states, such as Finland, often seek 'shelter' in larger groupings of states which not only can give them protection from potential threats, but also enable them to have a greater weight in international affairs providing they use appropriate strategies to push their priorities.

A small selection of literature provides useful definitions of how to characterise small states beyond just size criteria (Thorhallsson, 2006). It also looks at some of the strategies that small states in the EU use to win arguments in Council decision making (Panke, 2012) and one article in particular traces Finland's pedigree as a small state in the EU and how that has shaped its external action (Tiilikainen, 2006).

Defining small statehood and winning strategies

Looking more broadly at Small State Theory Baldur Thorhallsson (2006) writing from an Icelandic viewpoint explores how 'smallness' can be defined, and based on this develops a conceptual model. He demonstrates for instance that size is not just related to population, surface area or Gross Domestic Product (GDP), but can be a question of capacity for action⁵² and of political ambition. Thus, the skills of its bureaucrats and particularly diplomats are important and indeed those of its pressure groups and private firms, can all help to shape the perception of a states' size and its action capacity. *"A theoretical approach intended to explain EU member states' actions within complicated decision-making processes of EU institutions must therefore take account of both perceptual and objective aspects."* (p.28). His analysis of what can be considered as a small state in the EU could be used to identify a group of MS that could be expected to seek to influence the EU in similar ways to Finland as a basis for some comparative analysis.

Panke (2012) analyses in more depth two particular examples of EU decisions to see under what conditions small states can gain influence in the EU's negotiations processes. She looks in particular at **persuasion-based strategies** as small states have less bargaining power than large states. Although the two case studies on pesticides and vodka are rather removed from EU external policy, they do offer a number of interesting lessons⁵³. Thus, Panke suggests (p.332) that small states can:

52 He notes for instance that Finland, along with its Nordic neighbours (NO, SW & DK) provided 25% of all military personnel deployed by the UN PKOs during the Cold War.

53 Finland was in fact quite a key player in the debate on vodka and along with Sweden, Poland and the Baltic States won the argument despite the opposing side including several large member states (UK, FR & SP)



- **Concentrate their limited resources** (personnel and expertise) on specific issues that are most important to them;
- **Engage in capacity-building strategies** by working with stakeholders and NGOs to obtain additional information or increase their institutional memory of the EU;
- **Use a broad range of shaping strategies** (arguing, framing) vis à vis other MS and EU institutions.
- She concludes (p.342) that **active participation in debates** is an essential precondition. Large states can more easily afford to be less active because they tend to be included in any conciliation efforts. However, her research does suggest that the effectiveness of persuasion-based negotiation strategies do vary and therefore requires some close analysis to decipher:

*“The effectiveness of persuasion-based negotiation strategies depends on a match between the type of argument and the issue, as well as the resonance with the prior beliefs of the addressees of the arguments, rather than the size of the respective state. **Causal arguments that rest on solid scientific expertise are increasingly persuasive for technical issues.** If the issue at stake is politicized and has distributive effects, it is unlikely that technical arguments will matter. Normative arguments put forward by states that do not have obvious and narrow self-interests should be more effective, but only if the fairness-over-responsibility arguments resonate well with prior beliefs of the addressees of the arguments. **Thus, moral argument is unlikely to have an impact upon actors with adverse positions.** In such situations, **re-framing is an important strategy that seeks to link the policy negotiations to a broader context and thereby reverse the distributional effects.** The re-framing strategy is especially effective if the new frame is suited to reversing or neutralising cost–benefit calculations in regard to the policy at stake and if it resonates well with the actors’ prior beliefs about developments in the environment.”* (p.342) [own emphases added]

These conclusions can be used as one basis to formulate some hypotheses for this evaluation (see Box 15).

Box 15 Using Panke’s (2012) conclusions to formulate hypotheses on Influencing

Finnish influencing in the EU is more likely to be effective if it exhibits one or several of the following features:

- Limited resources are concentrated on a few carefully chosen objectives;
- Capacity building strategies with external stakeholders are used to obtain additional information or increase institutional memory of the EU;
- Causal arguments that rest on solid scientific expertise are used particularly for technical issues
- When faced with adverse positions a re-framing strategy is used to link policy negotiations to a broader context.

Source: Evaluation team, based on Panke (2012)



Finland as a small state in the EU

Using Thorhallsson's (2006) analysis (data from 2001-2004) we can see that Finland sits in a group of other comparable EU small states that also comprises Belgium, Portugal, Denmark, Sweden, Austria, Ireland based on various criteria such as GDP and ODA levels.

More specifically, Teija Tiilikainen's (2006) article on 'Finland – An EU member with a Small State Identity' explains how Finland's foreign policy both before and after joining the EU in 1994 was formulated in terms of the country's options as a 'small state'. This dates back to a period well before the scope of this evaluation, but it provides an interesting backdrop on how Finland's efforts to influence the EU in ways that it favoured were based on government perceptions of the country's challenges and opportunities. Finland thus recognised it could not compete with the large EU MS and it was therefore always strong on the 'community' method as opposed to the 'inter-governmental' method in EU governance, and often saw the Commission as an ally. This approach naturally brought it together with other small and medium sized MS once it joined the Union:

"..., the EU offers power opportunities to small states and Finland has sought to take advantage of these by subscribing to those principles which had been established by the original 'small states'. This has meant careful promotion of the common institutional and normative framework of the Union and the community-centred orientation of its power structures." (Tiilikainen 2006, p.79)

Tiilikainen (2006) also draws on other academic studies to argue that in terms of coalition building Finland has generally not pushed the 'Nordic bloc' because of its more positive orientation to the EU than either Denmark or Sweden, yet at the same time studies of voting patterns in the Council suggest that Finland is often on the 'winning side' along with the European Parliament and these two countries when it is a question of a legislative act approved by co-decision. On the other hand: *"Finland's success is not as great in those cases where the assent mechanism is used"* (p.82).

Her article goes on to discuss small state political systems and how, so as to maximise their influencing goals in wider settings, small states tend to develop strong internal political cohesion and functional efficiency in which even political opponents are willing to cooperate in order for the country to have a greater impact externally. She identifies various examples of this happening in the early 2000s. Though, off course, she was writing in 2006 since when a more anti-EU trend has also appeared in Finnish politics with the emergence of the True Finns party.

Tiilikainen's conclusions include the following points that can be taken into account in the evaluation:

*"Finland has learnt to compensate for its small size with other qualities such as clever politics or national stubbornness. **The reverse side of smallness is respectability and credibility in foreign policy and international cooperation.** [own emphasis] ... Size is, ..., still an important element of Finnish political identity. The small state perspective pushed Finland towards full EU membership at the beginning of the 1990s. Once in the EU, Finland smoothly subscribed to the group of small states by assuming the traditional identities assumed by members of this group. Smallness used to imply commitment to European integration rather than hesitation. It has implied a community-centred rather than an intergovernmental orientation towards the EU. In these respects, Finland is no exception to the small state identity. Finland also corresponds to the text-book model as far as its national political structures and cooperation among political actors are concerned. Everything paves the way for a **coherent policy based on a broad political consensus.**" [own emphasis]* (Tiilikainen 2006, p.85)



These conclusions also provide a basis for establishing some hypotheses for this evaluation (see Box 16).

Box 16 Using Tiilikainen's (2006) conclusions to formulate Hypotheses on Influencing

Finnish influencing in the EU is more likely to be effective if the Government / MFA:

- Emphasises respectability and credibility in foreign policy and cooperation;
- Builds coalitions that favour a community-centred rather than an intergovernmental approach in relation to EU decision making;
- Ensures its policies are coherent and based on broad political consensus. *Source: Evaluation team, based on Tiilikainen's (2006)*

Source: Evaluation team, based on Tiilikainen's conclusions (2006)

The hypotheses from Panke and Tiilikainen were used as an additional step in the analysis of the findings. They apply particularly to the influencing process (EQ2) phase of the analysis.



Annex 5: Small State Theory

A set of hypotheses were derived from Small State Theory as explained in Annex 4. These have been kept in mind during the research. The results of this analysis are detailed in Table 12 below. The overarching conclusion that can be drawn from this, and particularly in the area covered by EQ2 on the process of influencing, is that Finland's behaviour on influencing conforms well to the hypotheses advanced by Small State Theory. The importance of this conclusion is essentially that it provides reassurance that the approach Finland has adopted to EU influencing is recognised more widely in research. This is further confirmed by the findings of the Peer Review for this evaluation (Volume 2) that looked at the EU influencing practice of a set of other small states in the EU in development cooperation.

In Annex 4, seven hypotheses were derived from the work of two theorists of SST in particular, Panke (2012) and Tiilikainen (2006). These are listed in the left hand column of Table 12 while the other two columns identify the Findings and Conclusions that relate to each of them.







Table 12 Small State Theory: checking hypotheses against Finnish influencing approaches

SST HYPOTHESES BASED ON PANKE (2012) AND TILIKAINEN (2006)		FINDINGS	CONCLUSIONS
SST-H1	Limited resources are concentrated on a few carefully chosen objectives.	2.5	Conclusions C2, C6 In practice the MFA has followed this approach by concentrating its influencing efforts on its policy priority areas.
SST-H2	Capacity building strategies with external stakeholders are used to obtain additional information or increase institutional memory of the EU.	1.5.1 1.2.2	Conclusions C8, C3, C6 MEL is not strong but there is a good practice of hiring external experts when these are required. Limited capacity for managing EU delegated cooperation, TEIs, etc.
SST-H3	Causal arguments that rest on solid scientific expertise are used particularly for technical issues.	2.5 2.7.1 4.2	Conclusion C1, C2 Finnish technical development expertise is recognised in EU.
SST-H4	When faced with adverse positions a re-framing strategy is used to link policy negotiations to a broader context.	4.7 2.7.1	Conclusions C10, C11 Finland is recognised for its approach that emphasises trust and consensus building – see management of Presidency.
SST-H5	Emphasises respectability and credibility in foreign policy and cooperation.	2.7.1, 2.7.2 4.2	Conclusion C1, C2 Respectability and credibility in foreign policy and cooperation come out strongly.
SST-H6	Builds coalitions that favour a community-centred rather than an intergovernmental approach in relation to EU decision making.	2.1.1, 2.1.2 2.6.1, 2.3 1.4 4.3	Conclusions C3, C4, C10 Coalition building is widely used (C3) and the MFA puts effort into staying close to the Commission and adopting positions that are consistent with a community-approach (e.g., emphasis on maintaining NDICI ODA budget – C3) rather than an intergovernmental one. Other examples of taking the community approach seriously are the Presidency (C4) and respecting the independence of the Commissioner position
SST-H7	Ensures its policies are coherent and based on broad political consensus.	1.1, 1.4 2.4	Conclusions: C1, C2, C6, C11 Internally in Finland: Traditionally in Finland broad based consensus is part of Finnish approach (e.g., important role of KPT) but seems to have been a bit neglected on influencing policy. Externally in EU: Finland's development policy is generally coherent with that of the EU. (Finding 4.1)



Annex 6: Detailed rating of the significance of outcomes and Finland's contribution


Table 13 Significance of outcomes and Finland's contribution

	TIME-LINE	OUTCOMES	SCALE OF AGREED CHANGE (1)	LEVEL OF EU COMMITMENT (2)	SIGNIFICANCE OF ACHIEVED RESULT (1)+(2)	SIGNIFICANCE OF FINNISH EFFORT (3)	TOTAL (1)+(2)+(3)
NDICI							
1	2017-2021	Finland met most of its development cooperation priorities during NDICI negotiations (gender equality, single instrument, Arctic, forestry)	3	4	7	1 -2 ⁵⁴	8-9
2	2019 	<i>During Presidency:</i> Council mandate in NDICI negotiation was revised and Council conclusion on the role of EIB/EFSD+ adopted, allowing NDICI negotiation to stay on track	2c	3	5	3	8
3	2019 	<i>During Presidency:</i> compromise solution was found on the reference to migration, allowing NDICI negotiation to stay on track	2	3	5	3	8
4	2019 	<i>During Presidency:</i> Trilogue process with EP+COM started, leading to successful negotiation for the first round (cluster 1) ⁵⁵	2c	(+)*	2 (+)	2	4+
Gender equality (See gender outcome under NDICI, Tanzania and Nepal)							
5	2015-2017	The language for gender equality / SRHR was strengthened in the 2017 European Consensus for Development and before this, to a lesser extent – in GAP II (2015)	3	4	7	2	9
6	2019 	<i>During Presidency:</i> Council conclusions on GAP II annual report (with some reference to SRHR) were adopted by consensus during the Finnish Presidency	1	3	4	3	7
7	2020	The language on gender transformative approach has been significantly strengthened under GAP III	3	2	5	2	7
8	2021	A gender transformative working group has been set up	2c	2	4	2	6
Governance / Human Rights							
9	2021	Finland has influenced the EU in the language and content of the 'EU Toolbox on HRBA', which was updated in 2021	2b	2	4	2	6

54 1 (single instrument, climate, gender equality) 2 (Arctic, forestry)

55 Cluster 1 "informally" agreed by both Council and Parliament, allowing negotiations to continue.



	TIME-LINE	OUTCOMES	SCALE OF AGREED CHANGE (1)	LEVEL OF EU COMMITMENT (2)	SIGNIFICANCE OF ACHIEVED RESULT (1)+(2)	SIGNIFICANCE OF FINNISH EFFORT (3)	TOTAL (1)+(2)+(3)
Disability inclusion / Rights of persons with disabilities							
10	2019 	<i>During Presidency:</i> Language on intersectionality and inclusiveness was integrated into Council conclusion on GAP II progress report during Finnish Presidency	1	3	4	2	6
Education							
11	2021	The EU has increased its contribution to the Global Partnership for Education	2a	1	3	2	5
Others							
12	2021	Council amends negotiating directives for the negotiation of EPA with the ACP countries	2c	3	5	3	8
Nepal							
13	2019-2020	Finland's gender transformative approach in Nepal has influenced GAP III	3	2	5	2	7
14	2016	EU provided additional funding to Finnish Rural Village Water Resources Management Project	2a	1	3	2	5
15	2020	EU has adopted the decentralised model of governance from the Rural Village Water Resources Management Project, for working with local authorities	2b	1	3	2	5
Tanzania							
16	2020-2021	Finnish priorities (gender equality, forestry, governance) are reflected in the EU MIP, with 'gender transformative' mentioned in the title of one action document.	2a	1	3	2	5
17	2020-2021	Finnish priorities and long experience in the country have shaped the scope and geographical coverage of the forthcoming TEI Blue Economy in Tanzania	2b	1	3	2	5
Ukraine							
18	2018	EU has provided additional funding to Finland-led education project	2a	1	3	2	5
Colour codes		<i>Process case outcome (NDICI and Presidency)</i>	<i>Thematic Priority case outcomes</i>			<i>Country Case outcomes</i>	



TIME-LINE	OUTCOMES	SCALE OF AGREED CHANGE (1)	LEVEL OF EU COMMITMENT (2)	SIGNIFICANCE OF ACHIEVED RESULT (1)+(2)	SIGNIFICANCE OF FINNISH EFFORT (3)	TOTAL (1)+(2)+(3)
Key to rating system: three criteria used with scores to be allocated for each one						
Circumstances making the outcome (or result) more or less difficult to achieve (1+2)					(3) Significance of Finland's contribution (or effort required)	
(1) Scale of agreed change		(2) Level of commitment				
1: Consensus that reflects Finland priorities has been maintained 2a: EU has made new financial pledges at country, regional & global level that reflect Finland priorities 2b: EU has changed its approach to interventions at country, regional and global level that reflect Finland priorities 2c: EU has taken (intermediary) steps to promote changes at country, regional & global level that reflect Finland priorities 3: EU has made new policy commitment (incl. financial targets) that reflect Finland priorities		1: Commitment made by COM / EUD 2: Commitment made by COM and selected MS 3: Commitment formally approved by MS (Council) 4: Commitment formally approved by MS (Council and Parliament)			1: Finland as a follower 2: Finland as a leader – in situation of (general) agreement / absence of strong opposition 3: Finland as a leader – in situation of (some) disagreement	

Annex 7: Achievement of MFA EU influencing objectives for selected themes and processes

Table 14 Achievement of MFA EU influencing objectives for selected themes and processes

THEMES / PROCESSES	TIMELINE OF MFA INFLUENCING OBJECTIVES	ACHIEVEMENTS AGAINST MFA SPECIFIC INFLUENCING OBJECTIVES
Selected Themes		
<p><u>Gender equality</u> (with reference to NDICI)</p>	<p>The strategic documents clearly describing Finland's influencing objectives in relation to gender equality, are as follows:</p> <ul style="list-style-type: none"> • The MFA influencing plan for EU development cooperation (2018) includes the following target on SRHR: "EU development funding will allocate a higher contribution to SRHR". • In the ToC (MFA, 2020d), one objective is "Influencing EU on SRHR [...] and the preparation of the EU Gender Action Plan in CODEV [...] promoting the implementation of the EU Gender Action Plan at country level and in the next EU Development cooperation programming". • MFA influencing plan for EU development cooperation (2020; 2021-22) reiterates gender equality as a priority, with the NIDICI negotiation, Post-Cotonou negotiations, and preparation of the 3rd GAP being identified as the main opportunities to influence the EU on this front. This document also introduces the 2017 EU Consensus on Development as a benchmark. • On NDICI, Finland emphasises human rights as a starting point for the regulation. "Human rights, democracy and gender equality must be thoroughly involved. [...] With regard to SRHR, we must stick to a commonly agreed language in line with the European Consensus". • Gender equality was one of Finland's priorities during Finland Presidency (MFA, 2018c). It is also mentioned in the MFA's broad EU influencing plan (2020, 2021). • While there is no specific objective in Finland's Strategy for Africa, it is clearly stated that: "In all its activities, the EU must promote socially, economically and environmentally sustainable development and gender equality in a cross-cutting manner in line with the 2030 Agenda, and put young people at the centre of its Africa policy". • In a recent communication to parliament, Finland provides a comprehensive overview of Finland's position in relation to GAP III, with additional references made in relation to transformative change and an inter-sectional approach; and the negative impact of COVID-19 on women. 	<p>On the one hand, Finland's influencing objective in relation to gender were mostly achieved with NDICI: the NDICI regulation text is that "At least 85 % of new actions implemented under the Instrument should have gender equality as a principal or a significant objective, as defined by the gender equality policy marker of the OECD DAC. At least 5 % of those actions should have gender equality and women's and girls' rights and empowerment as a principal objective."</p> <p>Finland has also been successful in:</p> <ul style="list-style-type: none"> • Promoting the implementation of the EU GAP at country level, as shown in Nepal and Tanzania. • Strengthening the language on the gender transformative approach in GAP III (COM communication). <p>As listed in Table 1, another outcome has been the adoption of the GAP II annual report by the Council during the 2019 Presidency, which (compared to the GAP II Council conclusion) included some specific reference to SRHR and gender transformative approach. The Council adoption of the GAP II annual report gained in significance over time, as this was the last time that MS unanimously agreed to a shared EU comment on its gender action plan.</p> <p>On the other hand, due to opposition from two MS, Finland's ambitions were not met in relation to:</p> <ul style="list-style-type: none"> • Having the European Commission communication on GAP III adopted by the Council (through CODEV). • Securing a higher contribution of EU development funding allocated to SRHR. • Integrating shared values and commitments to SRHR, sexual orientation and gender identity, in the post-Cotonou agreement.



THEMES / PROCESSES	TIMELINE OF MFA INFLUENCING OBJECTIVES	ACHIEVEMENTS AGAINST MFA SPECIFIC INFLUENCING OBJECTIVES
<u>Disability inclusion</u>	<p>In <i>Priority Area 1: Rights of Women & Girls</i>. (ToCs 2020) a specific Policy Influencing Outcome that Finland seeks with the EU is:</p> <ul style="list-style-type: none"> • Disability inclusive strategies, policies and programmers and corporate-level accountability mechanisms. • Indicators for this are: Corporate level commitments, policies, strategies and accountability frameworks for gender equality and disability-inclusive development are in place and implemented. 	<p>The language included in the GAP II Annual Report Council conclusions during the Finnish Presidency (2019) refers to intersectionality and non-discrimination and makes specific mention of disability as well as gender. As confirmed in interviews this was on the basis of wording provided by the MFA disability adviser</p>
<u>Climate & forestry (with reference to NDICI)</u>	<p>With gender equality, climate resilience is a cross-cutting objective for Finland's development cooperation, with Finland promoting stronger language including a mainstreaming approach and targeted action.</p> <p>The MFA has included climate change in the EU development policy influencing plans (2018, 2020, and 2021-2022), with a list of related influencing items including: climate change mainstreaming in NDICI; focus on climate sustainability and low emission solutions; leveraging private investments to close the gap in climate finance; and engaging third countries more in climate action. The MFA's general EU influencing plans also include a variety of entry points.</p> <p>Concerning forestry (focus on development cooperation), the strategic documents promote an allocation of funds for forest-related interventions in the NDICI-Global Europe instrument (EU Presidency), as well as highlight the importance of including forestry as an eligible industry in the EFSD+</p>	<p>Concerning NDICI, Finland succeeded in making a commendable contribution to its own objectives; with references made to the regulation to promote sustainable forestry (including on in relation to the EFSD+ operations).</p> <p>The evaluation could not identify any specific effects associated with Finland's efforts related to climate change either as an individual player or with a group of LM.</p> <p>Concerning NDICI, Finland's mainstreaming objective (as stated in the communication to Finnish parliament) was in part achieved, although the target, as formulated in the final regulation, remains quite soft (compared to the harder target of 25% proposed by COM, Finland and other LM), as follows: <i>"Actions under the Instrument are expected to contribute 30 % of its overall financial envelope to climate objectives"</i>.</p>
<u>Education (with reference to Team Europe)</u>	<p>Looking across all relevant strategic documents over the review period, influencing the EU development cooperation on education has remained a secondary objective, until the new Commissioner Urpilainen (who took up her post in 2019) made an announcement that education will be (one of) her priorities.⁵⁶ The ToC (2021), under Priority Area 3, includes an explicit 'policy influencing' objective, with some reference to increasing the global commitments to inclusive education. The ToC output target does not just target the EU but also all IFIs.</p> <p>Since then, the MFA has strengthened its emphasis on influencing EU's development cooperation on education, including through Team Europe. The MFA development policy objectives for the EU strategy (MFA, 2018c) include for the first time a stand-alone section on Education (over 2 pages). In MFA's EU impact plan 2022 (covering all EU matters) (MFA, 2022c)", Finland supports the strengthening of the EU's global role in education development policy.</p>	<p>The EU has recently made an announcement to increase its contribution to the GPE, which is in line with one of the recommendations that Finland made to the EC and Finland's specific focus on increasing the global commitments to education. Under NDICI, the Annual Action Plan for Sub-Saharan Africa includes an education component for the first time in 2022.</p> <p>With Team Europe (see below), the EU and MS have also taken steps to strengthen their coordination on education, at country, regional and global level, on the back of the Council conclusion on Strengthening Team Europe's commitment to Human Development (June 2021), which Finland contributed to.</p>

56 -August 2020 <https://www.educationcannotwait.org/news-stories/featured-content/education-cannot-wait-interviews-eu-commissioners-jutta-urpilainen> October 2020; https://ec.europa.eu/commission/commissioners/2019-2024/urpilainen/announcements/speech-commissioner-urpilainen-global-education-meeting_en



THEMES / PROCESSES	TIMELINE OF MFA INFLUENCING OBJECTIVES	ACHIEVEMENTS AGAINST MFA SPECIFIC INFLUENCING OBJECTIVES
	<p>While education was not selected as a main development cooperation priority for the 2019 Presidency (gender equality and Africa were), promoting girls' access to education was identified as an entry point. Education also constituted an element of Finland's approach to partnership in Africa. The Africa Strategy (2021), in the chapter 'Partnership with the EU', states that "<i>Finland supports the initiative of the European Commission to increase EU-level inputs in education</i>".</p>	
Processes		
<p><u>Team Europe</u></p>	<p>In terms of the Team Europe approach, MFA picked up the topic early on and included the process in its internal EU development cooperation influencing plans for 2020 and 2020-2022. At this early stage, the influencing plans do not establish specific influencing outcomes on Team Europe, but re-iterate Finland's commitment to TE, as follows: "<i>Finland supports the EU's comprehensive approach (Team Europe) to respond to the coronavirus pandemic in partner countries. It is important to promote actions that strengthen the EU as an external actor and which implement the objectives of the European Consensus on Development.</i>"</p> <p>From a process point of view, Team Europe is a step further in the EU tradition of Joint Programming/Working Better Together, whereby Team Europe members (involving all EU institutions, MS and financial institutions) are committed to "<i>closely coordinate and jointly design, implement and monitor Team Europe Initiatives in an inclusive manner</i>". This is in line with Finland's previous commitments to joint programming, as mentioned in various strategic documents and memos over the review period. In the EU development cooperation influencing plans for 2020 and 2020-2022, emphasis is placed on co-programming / delegated cooperation.</p>	<p>Selected evidence (MFA, 2021d) shows that Finland actively participated in the CODEV working group discussion on the drafting of the Council conclusion on Strengthening Team Europe's commitment to Human Development (June 2021), with the final text mentioning SRHR and disability, as requested (orally and in writing) by Finland, Sweden and other LM.⁵⁷</p> <p>Finland has also demonstrated an active role in shaping country, regional and national TEIs of relevance to its development cooperation priorities, although there are some concerns that the MFA maybe over-stretched on this. This has included more specifically:</p> <ul style="list-style-type: none"> • Vaccine donations through the COVAX Facility. • Finland's participation in D4D Hub, as supported by the Commission and 12 EU MS. Within the Hub, Finland has assumed the leadership of the Digital Connectivity working group of the Hub's Africa branch together with France while acting as a member in the three other working groups (Digital Literacy & Skills; Innovation & Entrepreneurship; Digital Governance). • Finland's participation in an (COM-led) expert working group focusing on Team Europe approach to education. • Finland's participation in TEI discussion in Tanzania and Nepal, with evidence that Finland has had an influence on early design decisions. <p>The above shows that, although it is too early to talk about influencing outcomes, Finland was effective in using the opportunity of TE to promote its development cooperation priorities, and more specifically cross-cutting objectives (notably gender equality), in TE and joint programming discussion.</p>

57 Evidence on Finland's specific contribution to the TEI principles and guidelines (as first agreed by Council in April 2021) could not be found.



THEMES / PROCESSES	TIMELINE OF MFA INFLUENCING OBJECTIVES	ACHIEVEMENTS AGAINST MFA SPECIFIC INFLUENCING OBJECTIVES
<p><u>Presidency</u></p>	<p>The two main priorities under Finnish Presidency (development cooperation) were gender equality and Africa. The 2019 Presidency programme makes only a limited (and indirect) reference to the EU development cooperation agenda, with EU-Africa partnership receiving special emphasis under 'the EU as a strong global actor'. Other relevant elements include references to partnership with multilaterals, gender equality, and the inclusion of Arctic. The document does not specifically mention the role that Finland will play in NDICI negotiations.</p> <p>Africa was also mentioned as a priority in MFA general EU impact Plan, 11/2018, which was drafted with the Presidency in mind. This listed Finland's main positions on Africa, with references to the EPAs, post-Cotonou and EU financial reforms.</p> <p>More specifically on development cooperation, CoDEV workplan, as finalised in May 2019, remains deliberately quite broad, with a long list of priorities covering (i) gender equality as main priority, (ii) Agenda 2030, Africa, NDICI as horizontal priorities and (iii) another 12 priorities under development priorities. (MFA, 2019c) This approach was adopted to allow some flexibility along the way.</p>	<p>Table 13 shows that six influencing outcomes were identified and attributed to Finnish successful Presidency, with three on NDICI; one on gender; one on disability; and one on EPA.</p> <p>While heralded as a main priority in Finland Presidency Programme, no specific outcome was achieved on Africa – outside the revision of the EPA negotiating directives, which was largely unplanned. Instead, Finland promoted Africa as a priority mostly through the work of EEAS and the Foreign Affairs Council, and through public events and external communication.</p> <p>In the following years, Finland discussed the development of a comprehensive EU-Africa partnership in the Council, on the back of its own Africa Strategy, adopted in March 2021.</p> <p>As per interviews, Finland took the opportunity of its Presidency to discuss with the Commission the development of a comprehensive EU-Africa partnership. This helped pave the way for the publication of the Commission's and High Representative's communication on the EU Strategy for Africa in March 2020.</p>
<p><u>NDICI</u></p>	<p>Finland's position on NDICI was first shaped when the COM opened a public consultation in 2018. It was then presented in various MFA communications to the Finnish Parliament and, more recently, in the EU development cooperation influencing plan for 2020, as follows:</p> <ul style="list-style-type: none"> • Finland will support solutions that increase the coherence, flexibility and efficiency of EU external financing. The implementation of the instrument must ensure a flexible and strategic nature of funding. • The geographical focus of the NDICI must be on the EU neighbourhood, Africa and least developed countries and fragile countries. The focus of funding should be on Africa. • The basis of human rights must be the starting point for the regulation. Human rights, democracy and gender equality (incl. SRHR) must be kept in a cut-through manner. • With regard to the objectives of the instrument, Finland supports a high level of ambition for climate action and proposes the establishment of Arctic policy recordings. With regard to migration management, the starting point is primarily a flexible model based on positive incentives. • For the EFSD+, Finland supports the 'European Fund for Sustainable Development' open architecture and opportunities for small and medium-sized financial institutions to participate. 	<p>Finland's position on NDICI was largely achieved in relation to the use of a single instrument, geographical focus, and focus on thematic priorities, notably human rights, gender equality, climate action, the Arctic, migration, and the preference for an open architecture (with EFSD+).</p> <p>Arctic cooperation is mentioned as part of specific objectives of Union support under the Instrument for the Neighbourhood area. Including the Arctic (and indeed the 'border region' which refers to cooperation with Russia) became necessary precisely because the NDICI is a single instrument so needs to allow for cooperation with all parts of the world.</p> <p>The NDICI approach to tackling migration is development-focused and comprehensive, with a dual focus on migration management and root causes of migration and, the term "<i>flexible incitative approach</i>" (negotiated during Finnish Presidency) was retained in the final regulation.</p> <p>Importantly, Finland has also committed to push for the same priorities during NDICI implementation emphasising that "<i>from the point of view of Finland's development policy in general, special attention will be paid to the overall objectives of the Regulation on equality, climate and the environment, migration and education, both in the Council and in committee work, during the implementation of NDICI</i>".</p>



Annex 8: Interview guide

The evaluation team used this guide as a means of structuring and steering interviews with different stakeholder groups (mainly EU and MFA staff). Interview notes were written up using a template based on the Evaluation Matrix with evidence sorted appropriately down to JC level.

EU staff (Brussels, EUD, EU Member State)

B. Introduction / context

- Present position and any other position in the last 7 years – where they had links with Finland.
- Priority areas they have worked on and key decisions made by the EU in their field.

C. Influencing – Finland

- Qualify their **partnerships with Finland**: how often they meet, in which occasions, with whom and on which issues (**EQ2**)... *open question, then prompt if they have come across*:
 - Instances where Finland has helped **built coalitions** within the EU or with EU member states.
 - Instances where Finland was seen to **participate in EU (more formal) governance structures**.
 - Instances where Finland was seen to **take advantage of specific debates and opportunities**.
- **Examples** where they think Finland had had an influence on **EU staff positions** (people), and/or **EU decisions on policy priorities and operations/ways of working (EQ3)**:
 - *And what they see as the **main factors** behind this success – both **external factors** (including contribution from others) and factors that can be **attributed to Finland's influencing efforts**?*
 - *Have they come across any examples where **Finland's influencing efforts did not work** and why?*
- Their views on Finland's **comparative advantage / strengths (EQ1 and EQ2)** ... *open question then prompt to capture their views on*:
 - *Finland's visibility / external communication?*
 - *Leadership role in some areas?*
 - *Trusted, professional, credible and effective?*
 - **Strength as a small state?**



- Their views on Finland's potential **weaknesses** when influencing the EU.

D. Influencing – overall

- Key **lessons** of what works and does not work when influencing the EU, from **their own experience**.
- Key **recommendations** for Finland.

E. For peer review interviewees

- What does the country do in terms of allocating **resources** for EU influencing? (staffing resources, training, seniority incentives) and financial resources (including research and capacity building).
- What does the country follow in terms of **strategy / approach** to EU influencing, based on prioritised objectives; focused on specific themes; participating in specific bodies or groups? Is there a specific organisational set-up?
- **Areas / themes** in which the country aims at influencing on EU staff positions (people), and/or EU decisions on policy priorities.
- Can they name any **positive outcomes** of their countries' EU influencing in the last couple of years and any main factors of success in the country's influencing efforts?

F. Data collection to triangulate

- Ask for **names / contacts** of other people we should talk to (other key actors involved in influencing examples discussed during the meeting).
- Useful **documents** (incl. minutes, email conversation etc).

MFA staff (Helsinki, embassies)

A. Introduction / context

- Present position and any other position in the last 7 years – where they had links with the EU.
- Priority areas they have worked.

B. Influencing – Finland

- Qualify their **partnerships with the EU**: how often they meet, in which occasions, with whom and on which issues (**EQ2**)... *open question, then prompt if they have come across:*
 - Instances where Finland has helped **built coalitions** within the EU or with EU member states.



- Instances where Finland was seen to **participate in EU (more formal) governance structures**.
- Instances where Finland was seen to **take advantage of specific debates and opportunities**.
- **Examples** where they think Finland has had an influence (i.e., Outcomes) on **EU staff positions** (people), and/or **EU decisions on policy priorities and operations/ways of working (EQ3)**:
 - And what they see as the **main factors** behind this success – both **external factors** (including contribution from others) and factors that can be **attributed to Finland's influencing efforts**?
 - Have they come across any examples where Finland's influencing efforts did not work and why?
- Their views on Finland's **comparative advantage / strengths** when influencing the EU (**EQ1 and EQ2**) ... *open question, then prompt to capture their views on:*
 - Finland's visibility / external communication?
 - Leadership role in some areas?
 - Trusted, professional, credible and effective?
 - **Strength as a small state**?
- Their views on Finland's potential **weaknesses** when influencing the EU.
- Looking at the MFA **organisational set-up**, do they think of:
 - The quality of the **strategic approach** developed by the Ministry for EU influencing ... *open question then prompt if needed:*
 - based on realistic and prioritised objectives?
 - based on broad consultations (incl. with the embassies)?
 - based on credible evidence and use of **feedback / learning / monitoring mechanisms**?
 - The level of **resources** allocated to influencing the EU (prompt: staffing resources (training, seniority incentives) and financial resources (including research and capacity building))
 - The **organisational set up** (prompt: role and responsibilities of the various units and actors well defined and understood)
 - The **quality of partnership** with the wider Finnish government and parliament

C. Influencing – overall

- Key **lessons** of what works and does not work when influencing the EU, from **their own experience**.
- Key **recommendations** for Finland.



D. Data collection to triangulate

- Ask for **names / contacts** of other people we should talk to (other key actors involved in influencing examples discussed during the meeting).
- Useful **documents** (incl. minutes, email conversation etc).



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