Comments on draft SDSN report *Indicators for Sustainable Development Goals*

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#	OVERARCHING COMMENTS ON THE DRAFT TEXT
1	Congratulations on the results of the SDSN Global Initiative.
2	The Brazilian Society for Ecological Economics, a strong chapter of the International Society, once again, submits contributions to improve the measuring of sustainable development, with suggestions based on the Aichi Biodiversity Targets, Bhutan's concepts and measures of happiness and the Society's familiarity with conditions in Brazil and impoverished countries.
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COMMENTS ON SPECIFIC SECTIONS		

Page no.	Indicator no.	Comment
9	1	**GOAL 01: End Extreme Poverty including Hunger** Target 01a. End extreme poverty, including absolute **cash and non cash** income poverty ($1.25 or less per day). The indicator included in Bhutan's measure of happiness is consumption. To take this into account, the measurement of absolute income poverty should include non-cash income, as applied in Bhutan, including use of stock of consumer durables, goods and services received as gifts, assistance, health, recreation, etc.
10	14	**Goal 2: Achieve Development within Planetary Guidelines** Target 2B – Regarding country contributions to planetary guidelines The three indicators - 12, 13 and 14 – do not adequately measure countries' contributions to planetary boundaries. The country footprint relative to size of territory is a broadly accepted indicator of environmental pressure with

		established methods. Therefore, it is unacceptable to exclude this indicator. It should replace one of the 12-14 indicators. Target 14: Country footprint relative to size of territory. It would be sufficient for UNEP to set guidelines for countries to implement.
11	21	**GOAL 3: Ensure Effective Learning for All Children and Youth for Life and Livelihood** Goal 4 does not adequately consider the need to improve social attitudes conducive the improved human rights performance, nor do the environmentally related goals adequately consider the need to improve environmental attitudes. Therefore we suggest that education quality consider these factors in Target 3b, by broadening the range of learning outcomes. Target 3b. All girls and boys receive quality primary and secondary education that focuses on a broad range of learning outcomes and on reducing the dropout rate to zero. Regarding Indicator 21, we wish to add the words in bold: Proportion of girls and boys who master a broad range of foundational skills, including in literacy and mathematics**, social skills, including respect of others and informal knowledge, and environmental skills,** by the end of the primary school cycle (based on credibly established national benchmarks)
13	33	**GOAL 4: Achieve Gender Equality, Social Inclusion, and Human Rights** Much political and social violence around the world is due to lack of understanding and respect for diversity, among different genders, ethnicities, religions and sexual preferences. Bhutan includes cultural diversity and resilience as one of its measures of happiness. The Goal should be revised as follows: GOAL 4: Achieve Gender Equality, Social Inclusion, Human Rights **and respect for diversity** Target 4a broadly refers to gender, ethnicity, religion, disability, national origin, and social or other status. This is not taken into account in: Target 4c. Prevent and eliminate violence against individuals, especially women and children. Therefore, we suggest broadening Indicator 33 to include words in bold: Percentage of referred cases of sexual, gender, **age, ethnic, religion, disability, national origin**-based violence that are investigated and sentenced [in many countries records are kept]**.**
14-15	none	Goals 6 and 7 deal with rural and urban living conditions, without considering elements of community. Although not currently measured, thought should be given to indicators of community well-being or vitality, applied in Bhutan, including such factors as social and family cohesion, giving and volunteering, and

		community safety.
18	81	**Goal 9: Secure Ecosystem Services and Biodiversity, and Ensure Good Management of Water, Oceans, Forests and Natural Resources** Indicator 81 – Critical Biome Management Good management is best measured by the state of water, oceans and biomes. Thus critical biome management is not measured appropriately by protected areas. In countries like Indonesia, Congo and Brazil, most threatened biomes do not have effective protected areas. When they exist, their coverage is small in comparison to the size of the biomes. Much of these biomes have undefined property rights. Therefore, the most appropriate indicator is derived from the Aichi Strategic Goal B (Reduce the direct pressures on biodiversity and promote sustainable use) and the related Target 5 (Reduce the rate of loss, degradation and fragmentation of all natural habitats). Thus the proposed indicator 81 should be replaced with the total area in all natural habitats, whether formally protected or not, easily compiled from remote sensing, not only of forests, but also clean non-polluted rivers, mangroves, coral reefs, etc. There could be a weighting procedure to combine biomes. The Aichi targets include quantitative commitments to protect 17% of terrestrial areas and 10% of marine areas by 2020, but not quantitative measures of total area in natural habitats. There is also an Aichi target to restore 15% of all degraded sites by 2020.
18	82	Indicator 82 - Forest In many countries, including those mentioned, sustainable forest management is not widespread. Thus, the state of the forest is the best indicator of good forest management, the percentage of area under natural forest cover. The most appropriate forest response indicator would be controlled (or protected in a broader sense) forest areas, adding all those under sustainable management, protected areas and areas managed by indigenous peoples.
20	98	**Goal 10: Transform Governance and Technologies for Sustainable Development** The concept of governance as indicated by the targets appears to be limiting. In general, most of the literature agrees on common dimensions of governance like participation, rule of law, transparency, accountability, effective delivery of services and equity. It does not take into account some concepts reflected in UN ideals, included in four of Bhutan's six Good Governance dimensions measuring happiness: i) voice and accountability; iii) government effectiveness; iv) regulatory quality; and v) rule of law. The other two, on violence and corruption are adequately included in the SDGs. Although we recognize that it is difficult to develop indicators which adequately measure voice and accountability, government effectiveness and rule of law, we believe they merit further thought. An attempt at a measurement of regulatory quality is suggested below.

| | | Target 10b is currently: Adequate domestic and international public finance for ending extreme poverty, providing global public goods, capacity building, and transferring technologies, including 0.7 percent of GNI in ODA for all high-income countries, and an additional $100 billion per year in official climate financing by 2020.

Target 10b should be broadened. It is not enough to throw money at problems. Policies should also be right.

Therefore we propose that Target 10b be: Adequate domestic and international public **policies and** finance for ending extreme poverty, providing global public goods, capacity building, and transferring technologies. [ODA should be included as one component, in the specific indicators].

The proposed indicators are generally by source of financing when they should be by use (extreme poverty, providing global public goods, capacity building, and transferring technologies), adding all sources, thus reducing from 5 to 4 indicators. The indicator to measure finance for global public goods should concentrate on reducing the impact on global warming, such as funding to restructure production and consumption to emit less CO_2 equivalent gases.

The remaining indicator should be derived from Aichi Strategic Goal A: Address the underlying causes of biodiversity (and non-sustainable development) by mainstreaming sustainable development across government and society.

Paraphrasing Aichi Target 3, the last indicator should measure the extent to which prices are being made right, indirectly measuring regulatory quality:

Indicator 98: To what extent the following target is achieved: to eliminate, phase out or reform incentives, including subsidies, harmful to environmental sustainability in order to minimize or avoid negative impacts, and develop and apply positive incentives for the conservation and sustainable resource use, taking into account national socioeconomic conditions. |

Please add rows as necessary