Thank you Mr. Chairman for the opportunity to comment on the Zero Draft. The Partnership on Sustainable, Low Carbon Transport (SLoCaT), represents 88 organizations including MDBs, NGOs, research institutes, and UN agencies.

SLoCaT welcomes the progress made by the OWG in developing proposals for a comprehensive set of Sustainable Development Goals (SDGs) with the Zero Draft. We are grateful to see that earlier suggestions, on e.g. road safety, have been integrated more effectively in the 17 proposed SDGs and targets. However, we have several outstanding concerns.

First, we are concerned that transportation is not referenced as a mainstreamed topic in the new reference document, “Mainstreamed Topics for SDGs.” According to the recommendations of the 7th OWG session, transport should be considered a mainstreamed topic: “The importance of its (transport) inclusion in SDGs was well recognized, with many calling for it to be included at the level of targets under other goals”. If the OWG wants sustainable transport to be mainstreamed by not giving it a separate SDG, then we ask to at least be included in the mainstreaming document.

Second, to have a place to anchor transport, we believe there is strong need to retain a separate SDG for cities and human settlements, as in Goal 11. We are concerned by proposals to lump a human settlements SDG in with sustainable industry, employment, and consumption and production, where the spatial focus of a human settlements SDG would be lost. Such a merger of topics would make it more difficult to provide meaningful guidance to the development of the transport sector.

Third, we are concerned that where transport is mentioned in the goals and targets, the focus is on infrastructure, but should be on both transport infrastructure and services, for both urban and rural areas. It is the improved transport services and not the transport infrastructure as such that will generate most of the developmental impact required to realize elimination of poverty. Transport infrastructure is a necessary but not sufficient condition for sustainable development. Towards this end, we have suggested small edits to targets for goals 2, 5, 8, 11, and 17.

Finally, we note the omission of the importance of freight transport, which is a key form of transport services. It is increasingly clear that freight transport including freight for small-scale farmers is of key importance in realizing sustainable transport. This issue needs to be addressed by small insertions in targets for goals 8, 11, and 17.

In closing, I would note that parallel to the OWG process the SLoCaT Partnership has developed a Results Framework on Sustainable Transport to define the 2030 vision of the Sustainable Transport community on what should be achieved in terms of improving rural, urban as well as national and regional access to goods, markets, jobs and services while minimizing the negative impacts on road safety, air pollution and climate change. The SLoCaT Results Framework consists of 6 targets (3 on access and 3 on negative externalities) supported by a series of indicators. This framework has been submitted to you along with more detailed comments on the Zero Draft. We hope you might find it of use as you consolidate the SDGs.