We would like to commend the co-chairs for their work in preparing the Focus Area document. It reflects a positive effort to capture the core issues and themes that were discussed during the stock taking phase and is an important step forward in the process. We look forward to this process leading to a report that will easily lend itself to effective implementation ensuring inclusive sustainable development.

A number of important elements are well captured, but there are also issues that are missing and areas where we feel that it could be further improved. We note that the report is not seen as exhaustive, that we have been encouraged to reflect on the substance and not to begin “drafting”.

Respect for all human rights is a cornerstone of sustainable development. The causal interlinkage between eradicating poverty and ensuring basic human rights is clear and related to the “unfinished business of the MDGs”. Development can only be sustainable and equitable, if firmly anchored in the human rights framework. We would like to see a better mainstreaming of this perspective across the focus areas. The SDG Framework should be transformative and the solid integration of Human Rights within it is one of the key shifts required.

We think that the text on many of the focus areas, such as water and sanitation, ecosystems and biodiversity, SCP, sustainable cities and human settlements and marine resources, oceans and seas provides a good basis for further discussion. We do, however find, that the interlinkages (and integration) between these and the other focus areas should be further elaborated and strengthened.

We will now give some more specific comments on some of the Focus Areas. We will do so in the order in which they are listed in your document and as such they do not reflect an order of priority.
Focus area 1 on Poverty Eradication – we agree that this is linked to all other focus areas. This makes it challenging to choose what action areas should be included under FA1. Nevertheless, they should reflect the multidimensional nature of poverty. The current listing is not capturing this. In addition to the focus on the social and economic dimensions, the environmental dimension needs to be included, as poverty can only be eradicated irreversibly if it is done sustainably. Furthermore, countries affected by conflict have the highest incident rates of poverty, the framework should have strong inter-linkage between poverty eradication and the promotion of peaceful, non-violent and inclusive societies to ensure that sustainable development and poverty eradication can be achieved where extreme poverty is most prevalent. The cross-reference to interlinkages with poverty is also missing under some of the other areas, such as health and climate.

Focus area 2 captures important action areas on ensuring access for all to affordable, adequate, safe and nutritious food, boosting agricultural productivity in a sustainable manner and adapting sustainable farming practices, strengthening resilience of farming systems to climate change, and reducing food loss and food waste. References to the importance of non-agricultural food products, in particular from fisheries and aquaculture, as well as from forests, are however missing, and should be incorporated. Sustainable land use should also be included, as should the need to combat under-nutrition. Action areas on combatting obesity and over-weight should also be considered.

The text on Health and population dynamics in Focus area 3 is a good basis. It includes the unfinished business of the MDGs regarding maternal and child mortality and communicable diseases, as well as non-communicable diseases (NCDs). We also appreciate that it includes several action areas on the social and environmental determinants of health, a good starting point for further discussion. The list of interlinkages could be expanded to include other focus areas, such as education and energy.

We are, however, concerned that rights are omitted in the text on sexual and reproductive health. A large group of member states called for the need to respect and fulfil sexual and reproductive health and rights for
all individuals in the OWG sessions on Health, Human Rights and Gender Equality. This was also highlighted in the OWG summaries and in the consolidated progress report. We regret the omission of this issue from this document and would like to see this corrected.

**Women’s empowerment and gender equality** is quite well covered under focus area 5, but the importance of gender equality to achieve sustainable development should be included. Furthermore, gender equality should be addressed throughout all focus areas. Gender equality and the special concerns of women is only mainstreamed in 7 of the 19 focus areas and critically missing from such key areas as water and sanitation (6), infrastructure (10) and equality (12). When mentioning women’s equal participation in decision-making, the concept of leadership could be addressed. Ideally there would also be clear references to girls throughout the text, with specific reference to girls’ equality, freedom from discrimination, violence, FGM, child marriage etc.

Focus area 7 on Energy captures many key areas that need to be addressed and is a good starting point. Elements that could be added include the large potential renewable energy carries for creating jobs and enhancing energy security, in particular when coupled with an enabling environment for investment. Interlinkages between energy and employment, economic growth, cities, equality, climate and ecosystems should be further explored. We are encouraged by the inter-linkage between energy and gender equality and women’s empowerment as well as other focal areas.

The focus area on economic growth (8) pay insufficient attention to sustainability. We must eradicate poverty irreversibly. Sustained growth that is not sustainable is likely to cause increased poverty in the future. The need to decouple economic growth from environmental impact should be better reflected in the text. Sustainability is much better reflected in FA (9) on industrialization.

The texts on the focus areas on education and on employment and decent work (4 and 11) are good points of departure. Missing from the latter area is, however, text on the importance of addressing an unsecure working environment. And we miss food and nutrition security as one of the obvious interlinkages under education.
Climate change (15) is rightly described as posing a grave threat to sustainable development and poverty eradication. However, the text is focused on issues central to the UNFCCC negotiations, rather than areas that can produce climate smart solutions to key sustainable development challenges. Climate change is closely linked to many of the focus areas, including, poverty eradication, water and economic growth. Climate Change should therefore be an essential inter-linked element across focus areas.

We are pleased to see references to resilience under several focus areas. The issue of disaster risk reduction and management has, however, been omitted and should be reincorporated.

We are pleased to see Peaceful and non-violent societies and capable institutions captured under FA19. As already mentioned under the focus area on poverty we believe the interlinkages between peace, sustainable development and poverty eradication need to come out much clearer. Peace and stability are essential for a country’s ability to progress in all other areas. Some interlinkages are specified under FA 19, but should be cross-referenced, such as under the focus areas on poverty, education, gender equality and economic growth.

Issues regarding Governance and Rule of Law go beyond capable institutions and are relevant for all societies, whether rich or poor, in conflict or peace. They may therefore deserve a separate focus area. We furthermore believe Rule of Law and Governance elements should be more effectively integrated across the other focus areas, as they are essential for the performance within most or all of them.

We welcome that the concerns of indigenous peoples are generally reflected well in the document and would like to stress the importance of being consistent in applying the terminology “indigenous peoples” throughout the document.

Finally, we greatly appreciate the co-chairs’ use of interlinkages to get a sense of how areas will need to be planned together. We would encourage further work be undertaken on this, using for example gender equality or sustainable consumption and production as cases, and map out how a draft
structure of interlinked focus areas and targets might look like. That would assist us in more effectively determine interlinkages between focus areas and eventual goals and targets as we gradually develop the SDG framework.