Excellencies,

I wish to first thank you for giving us the opportunity to review and comment on the revised working document on the focus areas, goals, and targets on sustainable development. We commend you for your able leadership in moving the SDG process thus far.

I also want to convey on behalf of the Alliance of Small Island States our sincere gratitude to you for incorporating the elements of our proposed targets into the compilation document. While most of our proposed targets have been reflected, many have not. We do however recognize that at some point the texts and number of targets, goals, and focus areas will have to be streamlined and culled to keep the SDG document concise.

There were other important concepts and principles that we have had advanced and articulated during the open working group sessions, which have not been fully captured in the revised work document.

In view of the foregoing, we would like to call for your attention to the following issues:

- It is our understanding that the proposed targets listed under each of the focus areas in the revised document are for illustration purposes only.
- The indicative targets pay particular attention to LDC, and have not once mentioned SIDS, which is a special case and has unique and particular vulnerabilities.
Other specific comments on the revised document are herewith attached for your easy reference.

Again, thank you for this opportunity to comment and voice what we believe will help move the process along in a positive and constructive path. I trust our concerns will be considered and taken into account throughout the OWG on Sustainable Development Process.

Please accept, Excellencies, the assurances of my highest consideration.

Sincerely,

[Signature]

Marlene Moses
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PERMANENT MISSION OF NAURU TO THE UNITED NATIONS

COMMENTS

Co-Chairs’ Revised Working Document for 5 – 9 May Session of Open Working Group – Sustainable Development Goals

Below is a general reaction with comments on the Co-Chairs revised Working Document on focus areas, goals, and targets. These comments are prepared by Nauru in its national capacity as well as a member of the Pacific Troika with the understanding the Revised Document is not a negotiated document nor was it based on consensus. It is rather an encapsulation of the key points of the tenth session of the Open Working Group on Sustainable Development as understood and registered by the Co-Chairs.

Focus Area 1. Poverty eradication, building shared prosperity and promoting equality.

End Poverty in all its forms everywhere

COMMENTS

• All Focus areas have appropriate means of implementation with the exception of Focus Area 1. There is an envisaged high volume of activities that will be undertaken toward the achievement of the objectives of this focus area, and that would require means of implementation.
• Equal economic opportunity for all does not give due consideration to countries with unique and particular vulnerabilities such as SIDS.
• Building resilience of developing countries and reduce deaths, losses and damages resulting from natural and human induced disasters, especially those exacerbated by climate change. This framework needs to be guided by a quest for resilient development, which implies resilient economies, resilient ecosystems, and resilient societies, taking into consideration the particularities vulnerabilities of countries such as SIDS.
• The target that provides for full and productive employment for all, including women and young people needs to be viewed from a focus lens not to mean young people under legal age, which would be in contravention to international labor standards.
• Poverty of opportunities, especially for SIDS, needs to be taken into account. These include opportunity for decent employment and participation in decision-making at regional and international organizations.
• Reference on and linkage to climate change needs to be factored in poverty eradication. For SIDS, it is a pre-requisite to eradicating poverty and must be treated in a balanced manner. Global effort to address both mitigation of and adaptation to climate change can create employment and income opportunities, hence a step toward poverty eradication, building shared prosperity, and promoting equality.

Focus Area 2. Sustainable agriculture, food security, and nutrition

End hunger and improve nutrition for all through sustainable agriculture and improved food systems.

COMMENTS

• There is no mention on the protection of ecological system that supports food production.
• Targets should also include reducing vulnerabilities of countries that are primarily net food importers by stressing the crucial role of healthy marine ecosystem, sustainable fisheries, and sustainable aquaculture for food security and nutrition and in providing for the livelihoods of the people of the SIDS.
• There is a need for targets that address limitation of export restrictions on staple food products as well as the development of robust insurance schemes for farmers and fishers, in particular small
scale farmers and fishers, support for any economic losses resulting from natural and human induced disasters especially those exacerbated by climate change and to cater for food shortages.

- There need to be targets on government policies whose primary objective is growth, both in output and productivity. Additional output is needed to meet the growing demands of an expanding population, to increase exports or reduce import dependency, to create jobs and incomes for people in special case countries.
- Economic policies with growth, sustainability, stability, equity, and efficiency objectives to take account of the inherent instability of agricultural output because of weather and biological exigencies, equitable distribution of the benefits of agricultural activities, efficient use of resources, and maintaining adequate level of production through conservation and renewable resources.
- Appropriate macroeconomic and sectoral policies are of overriding importance in determining food security, particularly for countries in special situation. This applies, in particular, to policies on the pricing of farm inputs and outputs, which plays a central role in determining the direction, character, and rate of agricultural progress and sustainability.
- Missing reference as to how targets here will address climate change.

Focus Area 3. Health and population dynamics

Healthy life at all ages for all

COMMENTS
- Targets should be framed to tackle the high prevalence of debilitating communicable and non-communicable diseases.
- Ensure populations' state of physical, mental, and social well-being.
- Universal health coverage should also include financial risk protection with particular attention to citizens of countries in special situation, including countries with unique and particular vulnerabilities such as SIDS.
- Reduce the risk of non-communicable diseases, such as cardiovascular diseases, diabetes, cancer, and chronic respiratory diseases through the development and implementation of comprehensive and integrated and multi sector policies and strategies.
- There has to be target on the reduction in the risk, extent and severity of illness and not just on premature death from NCDs.
- There has to be targets on expanding preventive healthcare services relative to curative services.
- Strengthening simple, safe, low-cost medical procedures that can be delivered at the primary health care level (for example, by a community-based worker or a small health post in countries in special situation).
- There is a need to scale up efforts in enhancing the quality of the entire population.
- Promotion of the use of telecommunication and ICT infrastructure for telemedicine and other healthcare services for countries in special case.
- Missing reference as to how targets will also address climate change.

Focus Area 4. Education and life-long learning

Provide quality education and life-long learning for all

COMMENTS
- There is need to stress more equitable distribution of educational opportunities and reduction of existing inequalities based on gender, economic status, and geographic isolation.
- Greater internal efficiency of the educational system, through a reduction of the waste of resources caused by students dropping out or repeating grades, and improved quality of education.
- Greater external efficiency of the education system, through an increase in the relevance of schooling to the job market, so that students are equipped with the knowledge and skills needed to find employment.
- Development and maintenance of an institutional capacity to formulate and carry out educational policies and to plan, analyze, manage, and evaluate education and training programs and projects at all levels.
- Promotion of the use of telecommunication and ICT infrastructure in education, namely distance learning, to bridge gap from geographic isolation as in the case of isolated countries such as SIDS.
- Missing reference on how education targets will also address climate change.

Focus Area 5. Gender equality and women’s empowerment

Attain gender equality and women’s empowerment everywhere

COMMENTS
- Missing reference on how this focus area will address climate change.

Focus Area 6. Water and Sanitation

Water and sanitation for a sustainable world

COMMENTS
- The need for water security must be balanced with the need for ecosystem conservation and biodiversity preservation.
- There has to be inter-linkage between climate change and disaster risk management.
- There has to be inter-linkage between healthy and resilience coastal marine ecosystems and water security.
- Deficiency in water supply and waste disposal are principal reasons for the high mortality and morbidity rates of developing countries, including SIDS. Targets on universal access to safe and affordable drinking water, sanitation, and hygiene should also take into account countries with particular vulnerabilities such as SIDS.

Focus Area 7. Energy

Ensure access to affordable, sustainable, and reliable modern energy for all.

COMMENTS
- Modern energy services should stress safe and clean modern energy services, precluding the use of nuclear energy sources.
- The timeline (i.e., by 2030) for investment in renewable energy will preclude saving the existence of SIDS. If nothing is scaled up in 5 years (by 2020), many SIDS would have already succumbed to the effects and destruction of climate change and increased natural disasters. SIDS attach great importance to URGENT ACTION and intermediate and short-term timeline for scaling up investment in renewable energy and energy efficiency. Without timely action, sustainable development will be nothing but an illusion for SIDS, and as a matter of fact, everyone regardless of where they are.
- There is need for an integrated approach to establishing and strengthening innovative regional and national energy roadmaps, with an emphasis on renewable energy and energy efficiency, detailed resource planning, and energy storage and capacity development, especially in countries with unique and particular vulnerabilities such as SIDS.
- Use of online energy database that promotes international cooperation for research, skills and knowledge-sharing, and technological development and implementation of appropriate renewable energy and energy efficient and environmentally-friendly technologies.

Focus Area 8. Economic growth, employment, and infrastructure

Promote sustainable, inclusive and sustained economic growth and decent jobs for all

COMMENTS
- Stress the primacy of the development of social and economic infrastructure such as land, maritime and air transport, ports, telecommunications, ICT, and energy particularly in countries in special situations to enhance competitiveness and ensure integration with global markets.
- Infrastructure has to take into account increasing natural and human induced disasters, especially those exacerbated by climate change.
- There is need to also consider containment of any monopoly power such as that of airline services in SIDS not faced with any effective competition.
- Need to be conscious on the definition of youth, so we are not advocating child labor, as may be the case in promoting youth employment.
- There is need for targets on the critical factors for socio-economic development, which include increased productivity through savings and investment, performance of the productive sectors of the economy (agriculture, fisheries, and tourism); trade with a push on comparative advantage, efficient allocation of resources, and human resource and institutional capacity.
- There is need for the development and application of sound macroeconomic policies, using monetary and fiscal instruments, aimed at raising productivity, creating employment and income opportunities, stability, and ensuring the critical factors for economic development. These are preconditions for fostering responsive, resilient, and robust sustainable and inclusive economic growth.
- Scaling up investment in renewable energy and energy efficiency is one great opportunity to increase decent jobs and income opportunities for peoples in countries with unique and particular vulnerabilities such as SIDS.
- There is only mention of particular focus on LDCs but not other special case countries such as SIDS (see Focus Area 8 (f)). SIDS remain a special case for sustainable development due to their unique and particular vulnerabilities.
- Supporting effective and efficient delivery of financial products and services at national, regional, and international level is critical to improve the rate of saving and investment, especially for developing countries with unique and particular vulnerabilities such as SIDS.
- Macro-economic and sectoral policies should also strive toward strengthening the linkage between financial intermediaries and productive economic activities at all levels to foster productivity growth in all economies. This is something lacking in SIDS and could have a revolutionary effect and impact once mainstreamed in overall planning.
- Improve market access by developing countries, particularly those in special situation, through access to market information and affordable sustainable transportation network is vital for economic growth.
- Supporting private sector led growth economies, through promotion of investment in productive economic activities such as sustainable tourism, fisheries, and agriculture, is key to SIDS economic growth.

Focus Area 9. Industrialization and promoting equality among nations

Promote sustainable industrialization and equality among nations
Focus Area 10. Sustainable cities and human settlements

Build inclusive, safe and sustainable cities and human settlements

Comments
- Targets b, d, and e have linkage with climate change but need to be featured prominently and strengthened.
- Particular vulnerabilities of SIDS needs to be taken into account

Focus Area 11. Sustainable Consumption and Production

Promote sustainable consumption and production patterns

Comments
- Target f on corporate and social responsibility could be strengthened and expanded.

Focus Area 12. Climate Change

Take urgent and significant action to mitigate and adapt to climate change

Build a climate change goal based on the outcome of COP21 of the UNFCCC

Comments
- The Chapeau on building climate change goal based on the outcome of COP21 of the UNFCCC speaks to the reason that climate change is not appropriate as a stand alone SDG as this draft calls for the SDG to be a subset of what is agreed in the UNFCCC process.
- There is need to make certain that targets are ambitious and protect SIDS and at the same time link strongly to means of implementation as development is the responsibility of national governments first with support of international communities.
- As Climate Change is treated as cross-cutting, and there should be reference made or targets on climate change in appropriate focus areas.
- The adverse effects of climate change continue to pose significant risk to SIDS and their efforts to achieve sustainable development.
- For many SIDS, climate change represents the gravest of threats to their survival and viability, including some through the loss of territory.
- 12 a). AOSIS position is to limit the temperature increase to 1.5 degrees, whereas other Parties generally accept “holding the increase in global average temperature below 2°C or 1.5 °C above pre-industrialized levels.”
- 12 b). Change language to reflect that use in UNFCCC. It should read, “Build resilience and adaptive capacity to impacts of climate change in all vulnerable countries, with special recognition and support given to SIDS and LDCs.
- 12 c). This is already being done in many if not all countries as part of their national planning. A language to the effect of strengthening and assisting countries with mainstreaming, particularly SIDS and LDCs should be considered.
Focus Area 13. Conservation and sustainable use of marine resources, oceans and seas

Take urgent and significant actions for the conservation and sustainable use of marine resources, oceans and seas.

COMMENTS
- AOSIS has indicated that oceans and seas ought to be given a prominent role in the SDG framework, including through the consideration of a dedicated sustainable development goal.
- At Rio+20, we committed to achieving healthy, productive, and resilient oceans and seas. This is the purpose of the SDG and needs to be highlighted.
- Targets, as proposed under this focus area and elsewhere, do not sufficiently address the social and economic dimensions of oceans and seas.
- There is need to build human and institutional capacities to conserve, sustainably manage, and realize the benefits of sustainable fisheries. There is no clear target that addresses that in the current document.
- There is need to have a target along this line: Build capacity, including the transfer of marine technology and in particular fisheries-related technology, to enhance the ability of such states to exercise their rights in order to realize the benefits from fisheries resources and fulfill their obligations under international instruments.
- Means of implementation dedicated for this should not only focus on LDCs but should also focus on SIDS.
- The proposed text provides a good basis for discussion at these discussions, but in some targets the new timelines move back from agreed commitments. AOSIS would also suggest that the form and nature of the targets to be streamlined.

Focus Area 14. Ecosystems and biodiversity

Protect and restore terrestrial ecosystems and halt all biodiversity loss.

COMMENTS
- Needs linkages on how this focus area will address Climate Change.

Focus Area 15. Means of Implementation/Global partnership for sustainable development

Strengthen global partnership for sustainable development.

COMMENTS
- Efficiency in capital (financial, technology, human capacity, etc.) flow must be a factor in determining success in this area.
- Targets that relate to Climate Change should have specific means of implementation and be linked to partnership with the international community.
- Needs of countries with unique and particular vulnerabilities such as SIDS must be a priority in the consideration of means of implementation and global partnerships for sustainable development.

Focus Area 16. Peaceful and inclusive societies, rule of law and capable institutions

Peaceful and inclusive societies, rule of law and capable institutions.

COMMENTS
• This should be treated as an enabling environment conducive and congenial to sustainable development.