



Amina J. Mohammed  
Special Adviser of the Secretary General  
on Post-2015 Development Planning

Marienstr. 19-20  
10117 Berlin  
Tel.: 030 678 1775 93  
Fax: 030 678 1775 80  
E-Mail: [info@forumue.de](mailto:info@forumue.de)  
[www.forumue.de](http://www.forumue.de)

Berlin, October 16<sup>th</sup> 2014

### Open Letter: Synthesis report of the Secretary General

Dear Ms Mohammed,

2015 will be a decisive year for the elaboration of a new global development and sustainability agenda. The new agenda has the potential to create a universal set of goals to face global problems and crises that hinder sustainable development now and in the future. We, the German NGO Forum on Environment and Development, an NGO network working on environment and development issues, representing a wide scope of civil society stakeholders in Germany, have been following the sustainable development process intensively for many years and been actively engaged in supporting the Major Group NGO as well as, through various consultation processes and platforms, several UN institutions in their activities on the post-2015 process.

The Secretary General's synthesis report will constitute a major step in the elaboration of the new agenda and its related goals. At the UN General Assembly in September 2014 you underlined that this forthcoming report is going to be an "ambitious" one. While we welcome that the OWG report at hand addresses a series of important issues such as inequality within and among countries or important environmental aspects, looking closer serious gaps and misconceptions become evident. We would like to take the opportunity to share some observations and concerns with you regarding the OWG outcome document and would highly appreciate for them to be taken into account. In this letter, we focus on a few major issues underlined with a variety of examples.

First and foremost, the **new agenda needs to be a rights-based one**. The present OWG report, however, dramatically lacks references to human rights. While many targets rightfully talk about "access to", this is by far not enough. What all targets need is a strong focus on "right to" as well as "control over". In some targets this has already been noted, however, these few necessary references remain selective and put out of context. The important demands for "right to food" as well as the "right to water", for instance, are only mentioned in the preamble in reference to the Rio+20 outcome but are not reflected in the goals themselves.

We are especially concerned that the **environmental dimension of sustainability** is represented insufficiently in the OWG's proposal. In comparison with e.g. the social dimension, most environmental goals and targets are much less ambitious and less precise (e.g. "by 2030 achieve sustainable management and efficient use of natural resources" (12.2) remains a vague and weak target) and offer extremely scientific and technocratic solutions to political problems (e.g. "minimize and address the impacts of ocean acidification, including through enhanced scientific cooperation at all levels" (14.3) leaves out the important link to energy consumption patterns and climate change, i.e. one of the reasons for the problem in the first place).

This relates to the **missing connection between the three dimensions of sustainability**. The energy goal (Goal 7), for instance, completely lacks both social and ecological criteria. The missing notion of a holistic concept regarding the **connection of the environment with the people living in it** is striking. This becomes especially evident in any targets referring to conservation of ecosystems (14.5, 15.1 and 15.4), which all fail to mention a transparent and participatory management of protected areas as well as the rights of local communities and other affected stakeholders. We imperatively need a “people mainstreaming”, making sure that goals are not detached from the people themselves and that participation rights such as free, prior and informed consent are guaranteed.

We find it especially disconcerting that the OWG report fails to adequately address the **responsibility of the private sector**. While Multi-Stakeholder-Partnerships and Public-Private Partnerships are mentioned under the Means of Implementation (17.16, 17.17) and thus figure as a solution to pressing problems, we would like to see some reflection on the private sector’s role in contributing to those problems as well. A sustainable development agenda cannot ignore the fact that certain economic practices in a globalized world create inequalities, undermine democratic principles and perpetuate the exploitation of nature. To respond to those problems by solely “encourage[ing] companies, especially large and trans-national companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle” (12.6) completely ignores the current state of discussion, e.g. on binding regulation, mandatory disclosure of non-financial information or extraterritorial state obligations.

Furthermore, the proposal of the OWG shows **little innovative character**. While – at least on paper – everybody seems to agree that “business as usual is not an option” with regard to the new agenda, we actually observe just that when it comes to underlying concepts and presented solutions, which often even fall behind the general scientific and public discourse (e.g. “improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials” (6.3) falls behind existing decisions in Europe such as a general prohibition on water deterioration due to a water cycle’s pollution through waste, pesticide, industry, fertilizers and mining activities under the European Water Framework Directive). This low level of innovation is not surprising looking at the degree to which targets are preceded by an inexpressive and passive wording such as “ensure”, “recognize” or “strive for”, and models such as efficiency prevail over sufficiency all through the document.

It is striking that the report features **no criticism of the excesses of the current global economic system, and no revision of outdated development paradigms**. The goal on economic growth, employment and decent work (Goal 8) constitutes a good example: It builds on the “necessity of growth” and takes into account the environmental dimension in just one target (8.4 on resource efficiency and decoupling), which is rendered meaningless since it lacks any concretization, target date and/or measures of success. On the contrary, the report is based on the disproved theory of a “catch-up” development path assuming that economic growth is the foremost factor in ending poverty worldwide, ignoring to a great deal structural causes. Approaches such as measurement of wealth other than solely via GDP or alternative models to the continuous exploitation of resources as well as to a fossil-based economy are not even mentioned. Accordingly, visions and goals such as a 100% decarbonization of the energy sector are missing. Instead, path-dependent approaches such as “advanced and cleaner fossil fuel technologies” (7.a) prevail.

The discussion on **Means of Implementation (MoI)** is still not finished. However, we find it crucial to mention that the OWG text shows confusing tendencies of giving some goals very specific and pronounced MoI while others hardly have any or only very general ones. The MoI under Goal 16 fall under that category to name just one example.

Furthermore, many MoI fall short in naming explicit responsibilities of countries of the Global North but primarily focus on developing countries (e.g. “provide adequate incentives to developing countries to advance sustainable forest management” (15.b), this is equally important for countries of the Global North). In other cases, issues that could easily fit into targets or be one on their own are constituted as MoI, making them seemingly less important (e.g. “provide access of small-scale artisanal fishers to marine resources and markets” (14.b)). We therefore urge you as well as the community of states to place a high importance on the modeling of effective and comprehensive MoI for all goals.

As for the wish of some to break the agenda down to a handful, i.e. ten or fewer goals, in order to make them more communicable or “tweetable”, we think this is a dangerous logic that will in the end lead to a less ambitious, less inclusive, less sustainable and less effective agenda. Making the post-2015 agenda comprehensible for every person in the world is an invaluable and desirable aim. However, we worry that by starting to minimize the number of goals the sustainable character of the agenda will disappear leaving the goals to merely represent an MDG+ status. We therefore urge you to focus attention not on defining an ideal number of goals (that does not exist), but on **building a convincing, strong narrative** for a transformative and participative agenda able to reflect the reality of millions of people’s lives.

Lastly, we would ask you to make sure that the way of a transparent and open cooperation continues throughout the intergovernmental negotiation process, and the UN carries on to support a **strong civil society involvement** as it has done in the post-2015 process so far. We also call for the **inclusion of the environmental dimension of sustainability** as well as experts with an environmental background into other institutions linked to the post-2015 agenda, such as the Independent Expert Advisory Group (IEAG) on a data revolution.

We wish you much success in the drafting of the synthesis report and are very much looking forward to its release. We would ask you to consider our concerns while drafting the synthesis report. Please find attached our position paper on the environmental dimension in the post-2015 agenda which is a compilation of important environmental elements to be included in the new agenda. The paper was generated in a common effort of German environmental and development NGOs and therefore reflects a broad basis of civil society views. Please do not hesitate to contact us in case of questions or comments (+49 30 671775 75, [chef@forumue.de](mailto:chef@forumue.de)).

Yours sincerely,  
Jürgen Maier  
Director

German NGO Forum on Environment and Development

