

On behalf of the business community, I would like to provide the following comments on the indicators developed for Goals 13, 14, 15, 16 and 17.

Before we provide comments on draft indicators for climate change, business would first like to make the point that it is absolutely critical that ToRs and work plans are aligned with the UNFCCC. The Paris Agreement contains a number of provisions relating to review and stock taking and it is my understanding that Parties will be discussing the further elaboration of these elements starting with the UNFCCC's subsidiary bodies meetings this May. We would strongly urge that the relevant work of the IAEG – not only covered by SDG 13 by the way – be communicated and coordinated with the UNFCCC in a timely fashion.

We agree with all the Tier 3 designations proposed on this SDG.

Regarding indicator 13.1.1, the indicator should specify “climate change related” before disasters, as SDG 13 is exclusively addressing the issue of climate change and not the full retinue of disasters.

With regards to 13.2.1, we would suggest an indicator examining the degree to which NDCs being developed are integrated with national development policies, strategies and planning, including SDGs.

Indicator 13.3.1 should try and account for information services beyond formal education curricula, to account for ‘external’ actors, such as small hold farmers or First Nations Groups.

On 14.1.1, agree with UNEP's suggestion of dividing it into two distinct indicators, but our current view is the methodologies relating to plastic debris density are not sufficiently robust and so should be categorized as Tier III. We do so on the basis of a recent meeting of the Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection, where it was established that methodologies differ substantially between monitoring studies and that at this time it would be impossible to develop a uniform index that could be used as an effective indicator. The UNEP proposal for beach debris instead of plastics warrants consideration but would propose retaining a Tier 3 status at this time, as it is not internationally established that beach debris would serve as an effective proxy for plastics.

We welcome proposed indicator 15.3.1, as it is more closely aligned to the goal of achieving a ‘degradation’ neutral world. However, once again, make sure this work is closely aligned to the work ongoing with CBD and CDD.

On indicator 15.6.1, under Article 14 of the Nagoya Protocol, Parties have an obligation to make available to the Access and Benefit Sharing Clearing House established under the Protocol "legislative, administrative and policy measures on access and benefit sharing". Using the ABSCH as a source of information would go a long way in contributing to the monitoring for this indicator.

For indicator 16.4.1, we agree with its designation as Tier 3 and would recommend a definition of ‘illicit financial flows’ that explicitly focuses on illegal drugs and arms trafficking.

For indicator 16.5.1, we would suggest indicators that include # of government auditors per gov't employee or # of federal investigators or prosecutors focused on corruption per capita.

For targets 17.10, 17.11 and 17.12 we suggest that the World Bank's Logistics Performance Index (LPI) as an additional source of data used to measure the indicator.

For indicator 17.5.1, we note that there is NO tier assigned to it. We would strongly disagree with the proposed indicator and instead suggest that IAEG closely consult with the UNCTAD, as they are the most experienced UN body working on issues related to investment promotion regimes in LDCs.

In regards to 17.17, partnerships should not only be measured solely on dollar amounts committed to partnerships, but should also account for bringing knowhow, capacities skill sets, and networks to effect change.

Thank you Chairs