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Dear Mr. Secretary General,

In anticipation of your progress report on MDG achievement and proposals regarding the Post-2015 agenda, CIDSE, the international alliance of Catholic Development organisations would like to address some issues that we hope will be emphasised in your report. Since their announcement, CIDSE has monitored the MDGs and their implementation. We have advocated a transparent and legitimate process to put in place a strong Post-2015 framework since the MDG+10 Summit. We have also actively engaged in the Rio+20 Conference, its preparation and follow-up process. In doing so we work within the International Beyond-2015 campaign, which we co-founded and support, and other civil society groups working on this agenda.

A first set of comments are regarding the MDGs, what issues still need to be addressed or where fragile progress needs safeguarding; and the second on the Post-2015 proposals.

A) MDGs: What still needs to be done

1. Stronger emphasis on inter-linkages for goal achievement

Ending poverty and hunger and accelerating progress in social indicators of well-being such as health and education are interlinked among themselves and to several other factors. Some factors have long been recognised for their impacts on development outcomes: the ability to influence and decide on issues that impact your life, access to income and opportunity. Additionally, increasingly pressing factors such as **climate change and the accelerated consumption of limited planetary resources also impact on development gains**. The report should emphasise sustainable development and the lack of progress on MDGs 7 and 8. This emphasis must be accompanied by an analysis of the inter-linkages and the risks posed by the failure to address these inter-linkages.

CIDSE is an international alliance of Catholic development agencies working together for global justice

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A good case in point is progress towards the target of reducing the percentage of people living in hunger. Assuming that hunger can be ended through increased agricultural production with a "business as usual" approach ignores the linkages between food production and climate change. It fails to acknowledge that access to food must also be addressed. The multifaceted functions of agriculture in society deserve attention: beyond providing nutrition and livelihoods, it also keeps communities together, preserves cultural heritage and counters rural-urban migration. The report must stress that an approach to food security and accelerating progress to end hunger must be grounded in a sustainable development approach, stress ecological limitations and address food governance issues. Intensive agricultural practices are stripping the soil of nutrients, devastating the nutritional value of crops, alongside putting great pressure on ecosystems and reducing the share of small-holder agriculture, with all its economic and social consequences. **Investment in small-scale food producers via agro-ecological approaches can realise multiple dividends**, simultaneously increasing production, food and income security, enhancing resilience to climate-related and other livelihood shocks, and reducing agriculture's contribution to Greenhouse Gas Emissions. Power structures that sustain situations of vulnerability to hunger must also be addressed through increased investment in agriculture and strengthening the resilience of agrarian communities (e.g. protecting their ability to save and trade their seeds that face legal constraints in several developing and developed countries). At the level of global food governance, the role of the **Committee on World Food Security** as the most legitimate, inclusive and intergovernmental body whose mandate is to provide guidance and coordinate action on global food policies, and its Global Strategic Framework, must be acknowledged as to reduce policy fragmentation and **improve coherence in global policies**.

Another inter-linkage that deserves attention in the report is between empowerment and its multiplier effects on development outcomes. People who are meant to benefit the most from the MDG agenda - those living in poverty and on the margins of their communities - are often the most deprived of access to critical information and with least opportunity to take decisions which influence their own well-being. Even though empowerment and participation have not been overtly included in the MDGs, they have been the cornerstones of MDG implementation. Acknowledging this, **the report must stress the importance of access to information and justice, and an enabling environment for participation in the last lap to the MDG finish-line**. Weak institutions and inadequate regulation of the private sector are crucial issues to be addressed in this regard. **Putting in place an international transparency standard for country-by-country reporting of transnational companies' financial and non-financial policies and impacts is an important indicator of progress** in this regard.

2. Greater attention to the impact of recent developments on the global partnership

The Report should pay due attention to how the global partnership goal has been affected – for better or for worse – by the financial crisis and the resulting debt distress, budget-cuts (including development budgets) and the increased attention to tax issues. It should also highlight the gaps and opportunities to reach the global partnership goal.

Increasing levels of debt distress should be signalled while also taking note of important developments in the field of debt management and crisis. In doing so the report should call for **further endorsements of the UNCTAD Principles on Responsible Sovereign Lending and Borrowing**. Similarly, it should acknowledge new thinking **on mechanisms to deal with debt crises** and emerging working groups within the UN system to formulate proposals in this regard.

The report must also call for the increased political support for the agenda on domestic mobilisation of resources for development to be translated into concrete multilateral agreements and policy. **Agreement on a multilateral tool for automatic tax information exchange, stronger steps on the collection and publication of beneficial ownership information, and commitment to assess the impact of domestic tax measures on development outcomes are aspects of this agenda that hold considerable potential for supporting MDG achievement.**

While emphasising the unfinished agenda on voice and participation of developing countries in multilateral frameworks and norm-setting, the report should also note that 'demand-oriented' variables that may favour developing countries should be included in vote allocation formulas, as against 'supply-oriented' ones that prevail today. Given the continuing blatant imbalances in the IMF Board, the report should specifically call for the **immediate implementation of the commitments to reduce the number of European chairs by two, with the most crowded constituencies - most notably the African constituency - being given the benefit of the freed up seats.**

It is also important that the Report highlights concerning ODA trends and makes a **renewed call for fulfilling ODA commitments.** Stepping up action in areas where progress is lagging – whether on environmental sustainability, child mortality and universal education or beyond – will require a considerable increase in finance for development. The report should also dwell on the opportunity offered by innovative mechanisms to raise urgently needed finance. **Financial Transactions Taxes, for instance, have many potentials in this regard and deserve a specific mention in the report.**

B) On the Post-2015 agenda

1. Human rights and human dignity should be the starting point of the framework:

Sound policy making is centred on the dignity of every human being. It prioritises persons and groups who for reasons of gender, ethnicity, disability, social, religious, economic or other status are not treated with the respect their inherent dignity deserves. Girls and women in particular are not accorded their due respect and dignity. They play a key role at all levels of society: economic, cultural and beyond. In situations of poverty, conflict and marginalisation in particular, women and girls shoulder significant responsibility in designing the survival strategies of their families and communities. **A focus on women is essential in designing policy for the benefit of impoverished and marginalised sections of society.** The report would therefore be right in emphasising the need for gender to be the central focus of the framework.

With its simplistic "dollar a day" approach to poverty eradication, the MDGs did not provide a holistic framework within which to tackle poverty in all its dimensions. Starting with an emphasis on human dignity, the Report must emphasise the need for the **Post-2015 framework to be built on the universal human rights acquis**, the mechanism through which human dignity is formally recognised in standards and codified into law, and be grounded amongst others in the UN Guiding Principles on Extreme Poverty and Human Rights.

2. Prioritise what matters: Beyond a focus on growth

Economic growth does not necessarily equate with good development outcomes for people or planet. Facing climate change and the increased competition for scarce natural resources, people across the world are calling for a shift away from the "Growth Paradigm," with the emergence of social movements embracing a new way of life which would constitute a "Paradigm Shift." **The Report should mention the Growth critique and the alternatives being put forward.**

Countries with high levels of growth are often marred by high levels of inequality which results in persistent poverty, while countries with lower levels of growth are able to report improved societal well-being. The spectre of jobless growth haunts many countries, while evidence shows that high levels of employment can be achieved under conditions of low - or even no - growth. The dominant growth model – and even a green hybrid – requires a constant increase of production and consumption in the pursuit of profit and maximising efficiency, concentrating power in markets and undermining social equity. **Prioritizing growth is incoherent with the imperative to reduce inequality and eradicate poverty and betrays a lack of vision for a more equal and sustainable society.** These objectives are more likely to be reached by the fulfilment of human rights obligations by all actors, including the private sector, and a properly regulated, transparent financial system.

3. A vibrant civil society is the back-bone of the new framework

The Post-2015 process so far has been right to pay attention to the voice and participation of civil society. **The indispensable role that civil society, most notably NGOs, social movements and Faith-based institutions, plays in ensuring the effectiveness, ownership and sustainability of development outcomes must be emphasised in the report.** Learning lessons from the MDGs, the report must call for civil society to be integrated into the new partnership for the implementation of the framework. Participation and gender issues go hand-in-hand. Specific standards and policies must be put in place to ensure gender equality in participation processes to reflect the centralised focus on gender in the framework.

The report should suggest that **the process to shape the Post-2015 agenda, from the Special event in September onwards should be treated as a pilot** in this regard.

4. Accountability and financing of the Post-2015 framework are make-or-break factors

The Report would do well to recognize the fundamental importance of adequate accountability mechanisms at all levels.

The framework must be designed to put the right conditions in place to ensure that people in poverty and on the margins of society live a dignified and fulfilling life. These groups are often the last to benefit from development outcomes and the first to suffer the impacts of external shocks. Moreover, governments frequently side-step or even abandon their commitments to these groups. The Report of the High Level Panel of Eminent Persons on the Post-2015 framework calls for an approach that 'leaves no one behind' and recommends that no target be considered met unless it is achieved by all relevant social and income groups. **Rigorous and rights-based accountability mechanisms will be a valuable instrument to prevent this from being a cause of failure of the Post-2015 framework.**

Putting in place effective participatory mechanisms through which people, and specifically civil society, can hold duty bearers accountable is basic but fundamentally needed for this.

Ensuring transparency and adequate resources, as well as putting in place safeguards against corruption, conflict of interest, etc. within institutions such as the judiciary and the parliament will also be necessary. International mechanisms – most notably infrastructure to enforce human rights obligations – should be recognised and strengthened. Moreover, priority should be given to putting in place new mechanisms to enforce the human rights responsibility of the private sector. Above and beyond this is the need for a **specific accountability mechanism for the framework in itself**. People should be able to hold all duty-bearers: local, national or international, State and non-State, accountable for all goals and commitments set out in the framework. Dedicated infrastructure within the UN that is properly designed, resourced and governed will be needed for this.

Alongside this, availability and access to adequate finance will be an important factor determining the success of the new framework. The financial framework must build upon existing agreements: the Monterrey consensus, the Doha declaration on Financing for Development, the Accra Agenda for Action, the Busan declaration on development partnerships and beyond.

With falling ODA budgets and the imperative to significantly increase resources for development in the face of climate change, **governments should be called to implement "innovative mechanisms" such as Financial Transactions Taxes to fulfil their commitments.**

Addressing the trend to look beyond public funds, the report should call for **caution in the use of leveraging and blindly rushing to "crowd-in" private sector finance**. Strict fiscal, social and environmental rules that are effectively enforced should govern Public-Private Partnerships. Furthermore, enforcing **water-tight regulation for the private sector – in particular for transnational companies, their affiliates, subsidiaries and other associated entities – must be a general priority of the framework.**

Finally, we hope that the report will provide **clear directions and proposals for the process to formulate the new framework**. The weakness of the Rio+20 outcomes lay in their failure to clearly design a process that brought the SDG and Post-2015 agendas together. It therefore falls upon this report to lay out what will come after the Open Working Group, the intergovernmental Expert Committee on Sustainable Development Finance and other streams (e.g. on transfer and access to environmentally sound technologies); the role of the High Level Political Forum and the **mechanism for the inclusion and participation of civil society** in these processes.

Mr. Secretary General, you have a challenging task to deliver a report that will inspire all to do what is necessary to reach the MDGs by 2015, while setting a clear vision and road-map for the Post-2015 framework. We look forward to the outcomes of the relentless efforts of you and your team in living up to this challenge. We hope to welcome an ambitious and visionary report that will set the right tone for the Special Event in September and the ongoing process of agreeing the Post-2015 agenda.

Yours sincerely,



Bernd Nilles,
Secretary General