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UN Non-Governmental Liaison Service  
UN DESA Division for Sustainable Development

**VIA ONLINE FORM SUBMISSION:** <http://bit.ly/1zFfg5v>

Dear Mesdames & Messieurs:

Thank you for the opportunity to submit these comments on the Synthesis Report of the Secretary-General on the Post-2015 Sustainable Development Agenda, “The Road to Dignity by 2030” (Report). Earth Law Center (ELC) is a Section 501(c)(3), U.S.-registered NGO that works to recognize in law the inherent rights of the natural world to exist, thrive and evolve.

In preparation for the continued elaboration of the post-2015 development agenda, ELC respectfully urges the Secretary-General, the U.N. system, and Member States to recognize in their deliberations the importance of reversing, rather than slowing, the trend of ongoing degradation of ecosystems and species. As the Report correctly notes, we live in an “irreversibly interconnected world,” one where “the challenges faced by any become the challenges faced by each of us — sometimes gradually, but often suddenly.” (¶ 16.) This is true not only with respect to challenges faced by human populations, but also challenges faced by the natural world, on which we utterly depend. If we do not prioritize care for the Earth, our home, we will find that its ongoing degradation will contribute, directly and potentially irreversibly, to our own.

To that end, we urge the assembled parties to commit to strategies and actions with regard to planetary well-being that reach beyond those suggested in the Report. In particular, we request the assembled parties to agree to goals grounded in reversing the trend of ecological degradation, rather than solely “sustainably managing,” “combating” or even “halting” degradation. The damage done to date has been enormous, and with increasing pressure on the planet from all sides, any commitments short of reversing the damage done will fall short.

For example, in Paragraph 63 the Report notes the “possibility of maintaining the 17 goals” developed by the Open Working Group (OWG), which it then lists. While these goals are a start, they must reach further as “goals” to serve as an adequate foundation for the specific actions that will arise from the upcoming discussions. The OWG’s Goal 15, for instance, does state the intent to both halt “and reverse” land degradation; the assembled parties should take this specific goal as direction for other ecological commitments. Suggested

edits to the OWG goals to reflect a revised goal of reversing the trend of ecological degradation are reflected below for illustration:

**Goal 13. Take urgent action to swiftly halt ~~combat~~ climate change and begin to measurably reverse its impacts\***

**Goal 14. Conserve and sustainably use the oceans, seas and marine resources within the larger framework of halting and reversing impacts caused to natural marine systems for sustainable development**

**Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, including through commitments to sustainably manage halt and reverse ongoing damage to forests health, ~~combat~~ halt and reverse desertification, and halt and reverse land degradation and ~~halt~~ biodiversity loss**

Similarly, Report paragraphs 75 and 76 commit only to actions that “respect planetary boundaries.” In other words, they implicitly assume that degradation is acceptable if it is up to the boundaries of what the planet can potentially handle. Two concerns arise here. First, we simply do not have the science to definitively state what a single planetary boundary is, given the cumulative and synergistic impacts regularly occurring among different stressors. So as a goal, this will be elusive, and mistakes can cause significant repercussions. Second, allowing degradation to continue to a point past which the planet may be irreversibly damaged *by definition* does not “respect” the planet. Our goal as a larger human society should be to aim for *planetary health and well-being*, not degradation to the point of no return. A goal of planetary health will result in actions to stop degradation well in advance of an estimated planetary “boundary.”

Moreover, the final post-2015 agreement should also include commitments consistent with recognition of the inherent rights of nature to exist, thrive and evolve, as referenced in the final outcome document for the 2012 U.N. Conference on Sustainable Development, and in subsequent outcome documents from General Assembly Interactive Dialogues on Harmony with Nature.<sup>1</sup> This is particularly true with respect to climate change; the impacts of climate change on planetary systems are currently and inexplicably minimized in the Report. Suggested edits are offered below to illustrate these points.

**Planet: to protect our ecosystems for their own well being, for all current human ~~all~~ societies and for our children**

75. To respect the inherent rights of the natural world to exist, thrive and evolve, and to address ecological degradation well in advance of estimated ~~our~~ planetary boundaries, we need to act immediately to halt and begin to reverse

<sup>1</sup> <http://www.harmonywithnatureun.org/dialogues.html>.

the ecological damage that humans have caused to the Earth's natural systems. This will include efforts to equitably address climate change, halt biodiversity loss and address desertification and unsustainable land use. We must protect wildlife, safeguard forests and mountains and reduce disaster risk and build resiliencies. . . .

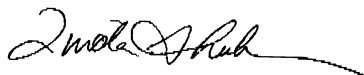
76. Sustainable development is at risk as evidence proves that warming of the climate system is now undeniable and human activities are its primary cause. . . . The longer we wait to take action towards sustainable production and consumption, the more harm – much of it irreversible - will be done to ecosystems, species and human populations, the more it will cost to solve the problem, and the greater the technological challenges will be. Adaptation can reduce some risks and impacts of climate change. Most urgently, we must adopt and immediately begin to implement a meaningful, universal climate agreement by the end of 2015.

Finally, we agree with the Report's recommendation for development of "alternative measures of progress, beyond GDP," given that "[n]ew measures of subjective well-being are potentially important new tools for policymaking." (¶ 135.) However, the metrics for assessing progress markedly leave out the natural world, focusing instead on human progress. Assessment of "progress on sustainable development" will fail unless it includes planetary systems. Also, civil society must be consulted in the development of these metrics, as NGOs and others have important insights into the well-being of their human and ecological constituents. Suggested edits are offered below.

135. Member States have recognized the importance of building on existing initiatives to develop measurements of progress on sustainable development that go beyond gross domestic product. Thus, work on developing alternative measures of progress, beyond GDP, must receive the dedicated attention of the United Nations, international financial institutions, the scientific community, civil society and public institutions. These metrics must be squarely focused on measuring social progress, human well-being, the well-being of ecosystems, species and the planet as a whole, justice, security, equality and sustainability. Poverty measures should reflect the multidimensional nature of poverty. New measures of subjective well-being of both people and planet are potentially important new tools for policymaking.

Thank you for your attention to these comments. We look forward to working with you, and the larger U.N. community, and Member States toward achieving the lasting well-being of both the Earth and its human populations.

Sincerely,



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