THE DANISH INSTITUTE FOR HUMAN RIGHTS

Comments on the proposed global priority indicators for the 2030 Sustainable Development Goals (SDGs)

Submitted by the Danish Institute for Human Rights to the open consultation on the global indicator framework of the Inter-agency and Expert Group on SDG Indicators (IAEG-SDGs)

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Human Rights Reference and Relevance of the Proposed SDG Indicators

It is explicitly affirmed in the Outcome Document for the 2030 sustainable development agenda that the SDGs should contribute to the realisation of human rights - while human rights instrument should guide the strategies for their implementation. However, it is not well understood what the concrete linkages are between human rights instruments and the 17 goals and the 169 targets.

The Danish Institute for Human Rights (DIHR) has undertaken a comprehensive mapping of the human rights references implicitly or explicitly embedded in the SDG targets. Based on this mapping, DIHR has further undertaken a review of the proposed priority indicators, in order to assess their reference and relevance to human rights, as well as the correspondence between indicators and targets[1] .

The review can help:

- Identify gaps where proposed indicators do not capture relevant human rights references of the targets;
- Provide guidance to align the proposed indicators with international human rights standards;
- Identify priorities for additional global or national indicators to ensure a human rights-based approach to monitoring of the SDGs.

The full mapping of targets and human rights references as well as the review of indicators is available at: DIHR website: www.humanrights.dk/sdg-guide

[1] see Annex A for the methodology applied

Key findings of the human rights review of proposed SDG indicators:

Overall, it can be concluded that the SDG targets have a high degree of relevance and convergence with the provisions of core human rights and labour standards, and thus provide an unprecedented opportunity to contribute to the realisation of human rights at a global scale.

The review of the proposed indicators under goals 1-6, 8, 10, 11, 13 and 17 suggests that of the 130 indicators:

- 77 indicators refer explicitly or implicitly to human rights
- 37 indicators are human rights relevant (thematically overlapping contents)
- 26 indicators have no reference to human rights

This relatively high number of indicators that are either human rights referenced or relevant further suggests that the SDG monitoring will contribute data, which can be used to monitor key aspects of the realisation of human rights[2].

Moreover, this high degree of convergence also suggests that data and information generated through the human rights system, e.g. through treaty monitoring bodies and national human rights institutions, among others, can contribute to monitoring the implementation of the agenda.

However, while the assessment of the human rights reference and relevance of targets and proposed indicators is generally positive, the review also identified a number of weaknesses and areas that could be strengthened:

- The human rights principles of participation and accountability are only weakly reflected across the indicators.
- There are relatively few "structural" and "process" indicators under certain goals, which will make it difficult to measure the efforts undertaken by states - and make it difficult to link these efforts to the outcomes. This is particularly problematic where outcome indicators are proposed to measure the goal-specific means of implementation, for example under goal 16.
- The requirement for comprehensive disaggregation of data related to prohibited grounds of discrimination is only addressed in a few indicators, such as that proposed for target 17.18, while others only address a few grounds (e.g. age or gender) or none at all. Disaggregation of data may take place at the national level rather than globally, but there is a need to systematise the requirement for disaggregation across the indicators framework, thereby sending a signal to national levels concerning required efforts in this regard.
- In a number of cases, the proposed priority indicators have weak or no correspondence with the human rights contents of the targets, or only address the targets in a very partial manner.

The above analysis has revealed important gaps, such as, for example, the failure of the proposed indicators under Goal 3 to address the issue of mental health, as

[2] See Annex B for an overview and analysis of the distribution of the indicators across the goals.

reflected in target 3.4. and as enshrined in the International Covenant on Economic, Social and Cultural Rights. Likewise, the ambition of target 8.7. to eliminate forced labour is not addressed in the proposed indicator. A similar example can be found under goal 16.6., where one of the proposed indicators measure economic efficiency, but fails to address the intention reflected in the target of developing effective and accountable institutions.

In order to address these concerns, DIHR has elaborated comments and recommendations on the issue of data disaggregation[3], and made an overview of the specific indicators that most notably fail to uphold and address the human rights contents of the targets[4] .

DIHR hopes that these can serve as a contribution to the important work of the IAEG-SDGs, towards the elaboration of a more adequate, robust and targeted indicators framework that will further a human rights-based approach to the SDG implementation, follow-up and review.

[3] See Annex C
[4] Annex D

Annex A: Methodology for the assessment of SDG indicators:

The review of the proposed SDG indicators undertaken by the Danish Institute for Human Rights, including the correspondence between indicators and targets, is based on the following methodology:

Categorisation of indicators	**Assessment criteria**
Explicit human rights reference	Indicators have explicit reference to human rights standards
Implicit human rights reference	Indicators are broadly framed with reference to or conceptually overlap with: ▪ Cross-cutting human rights principles such as Accountability and the Rule of law; Equality and Non-discrimination; Participation and Inclusion; Transparency, and Universality. ▪ Processes of "empowerment" ▪ Concepts such as "availability", "accessibility", "acceptability", and "affordability".
Human rights relevance	Indicators overlap substantially with human rights subjects without using a human rights language, and are conducive to the realisation of human rights.
No human rights reference	Indicators are neither explicitly nor implicitly or substantially human rights related.

Annex B: Categorisation and analysis of indicators for selected goals

Goals	Human rights referenced or relevant indicators	Indicators with no human rights reference
Goal 1. End poverty in all its forms everywhere	Six indicators refer explicitly or implicitly to HR, one of them explicitly Two indicators are HR relevant	None
Goal 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture	Three indicators are HR relevant	Two indicators have no reference to HR
Goal 3. Ensure healthy lives and promote well-being for all at all ages	15 indicators refer explicitly or implicitly to HR, the majority of them explicitly One indicator is HR relevant	None
Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	Seven indicators refer explicitly or implicitly to HR Two indicators are HR relevant	None
Goal 5. Achieve gender equality and empower all women and girls	11 indicators refer explicitly or implicitly to HR, the vast majority explicitly	None
Goal 6. Ensure availability and sustainable management of water and sanitation for all	Three indicators refer explicitly to HR. Six indicators are HR relevant	One indicator has no reference to HR

Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	Seven indicators refer explicitly or implicitly to HR, the vast majority explicitly One indicator is HR relevant	Six indicators have no reference to HR
Goal 10. Reduce inequality within and among countries	Three indicators refer explicitly or implicitly to HR Six indicators are HR relevant	Three indicators have no reference to HR
Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable	Three indicators refer explicitly or implicitly to HR Five indicators are HR relevant	Three indicators have no reference to HR
Goal 13. Take urgent action to combat climate change and its impacts	One indicator refers explicitly to HR Three indicators are HR relevant	One indicator have no reference to HR
Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels	12 indicators refer explicitly or implicitly to HR, the vast majority explicitly Five indicators are HR relevant	None
Goal 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development	Six indicators refer explicitly or implicitly to HR Three indicators are HR relevant	10 indicators have no reference to HR
Total : ▪ 77 indicators refer explicitly or implicitly to human rights ▪ 37 indicators are human rights relevant ▪ 26 indicators have no reference to human rights		

The review demonstrates that most of the indicators reviewed are classified as either explicitly or implicitly human rights referenced or as human rights relevant. The majority of indicators proposed under Goal 3 on health, Goal 5 on gender, Goal 8 on sustainable and inclusive production, and Goal 16 on Peaceful and inclusive societies are explicitly human rights referenced. Indicators under Goal 4 on education also include a substantial number of human rights referenced indicators, about half of them with implicit reference to human rights. Most indicators on Goal 1 on poverty refer implicitly to human rights.

With respect to Goal 2 on hunger and food security, Goal 6 on water and sanitation, and Goal 10 on inequality within and among nations, the majority of indicators include overlapping thematic and substantial contents with human rights, i.e. the majority of indicators are human rights relevant, but not referenced. As far as Goal 10 is concerned, a number of the proposed indicators relate either to inequality among countries or employ conventional economic measures, which overlap with human rights, while not referring directly to human rights principles or concepts. Most indicators under Goal 17 are not human rights referenced; only a few of the indicators under this goal are explicitly human rights referenced.

Annex C: Disaggregation of data

The Outcome Document on the 2030 Sustainable Development Agenda specifies in para. 74 (g) that the follow-up and review mechanisms will be "*rigorous and based on evidence, informed by country-led evaluations and data which is high-quality, accessible, timely, reliable and disaggregated by sex, age, race, ethnicity, migration status, disability and geographic location and other characteristics relevant in national contexts*".

This is reaffirmed in target 17.18., which explicitly aims, by 2020, to significantly increase the availability of data disaggregated by income, gender, age, race, ethnicity, migratory status, disability, geographic location and other characteristics relevant in national contexts.

The above approach is largely consistent with the so-called "prohibited grounds of discrimination" and address the cross-cutting human rights principles of non-discrimination and equality. Hence, the adequate implementation of target 17.18. is key to enabling a systematic monitoring of the equality and non-discrimination dimensions of the entire 2030 development agenda, and to realising the slogan of "leaving no one behind".

However, the requirement for comprehensive disaggregation of data is only addressed in a few indicators, such as that proposed for target 17.18, while others only address a few grounds of discrimination (e.g. age or gender) or none at all.

It is of outmost importance for the human rights relevance of the indicators framework that:

- ✓ A systematic approach to disaggregation of data based on prohibited grounds of discrimination is mainstreamed across the indicators framework.
- ✓ Full disaggregation is recommended for a number of strategically selected indicators (selected, for example, on the basis of criteria such as their human rights reference and importance for reducing inequalities)

Further, in order to counter arguments about the lack of data availability, it will be crucial that the IAEG-SDGs provide:

- ✓ Guidance towards participatory innovative approaches to data collection in collaboration with concerned rights-holder groups, where data are not readily available or cannot be gathered through existing data collection methods.

National Human Rights Institutions, along with the Office of the High Commissioner for Human Rights (OHCHR) and others can contribute expertise in this regard.

Annex D: Comments on specific indicators, particularly regarding the correspondence between targets and indicators:

Target	Indicator	Comment
1.4.	Proportion of the population living in households with access to basic services Share of women among agricultural land owners by age and location	The proposed indicators fail to address inheritance, natural resources, appropriate new technology and financial services, including microfinances, as mentioned in the target.
1.b.	Number of national action plans related to multi-lateral environmental agreements that support accelerated investment in actions that eradicate poverty and sustainably use natural resources.	The proposed indicator fails to address the gender-sensitivity aspect of the target
2.1..	Prevalence of undernourishment	The proposed indicator fails to address the "access to food aspect of the target 2.1. and seems more adequate for monitoring target 2.2. Also, the indicator does not allow for disaggregation and thus does not relate to the poverty and vulnerability aspects of the target
2.2.	Prevalence of population with moderate or severe food insecurity, based on the Food Insecurity Experience Scale (FIES)	While the target refers to under-five stunting and wasting, as well as the particular needs of adolescent girls, pregnant and lactating women and older persons, the indicator intends to measure food insecurity. Not a strong congruence. The indicator would seem better placed under target 2.1.
2.3.	Value of production per labour unit (measured in constant USD), by classes of farming/pastoral/forestry enterprise size	The indicator is not as specific with respect to types of occupation as the target is and does not emphasize the equality aspect. The indicator does not address the crucial aspects of secure and equal access to land and other productive resources. Hence there is only a weak correspondence with the target. A more adequate indicator would focus on "Status and trends in traditional occupations". Traditional occupations is a concept in international law (under, e.g. ILO Convention No. 111) and can be informed by labour statistics. This indicator is already adopted as one of the official indicators for monitoring the implementation of the Convention on Biological Diversity (CBD).
2.5.	Ex Situ Crop Collections Enrichment index	The proposed indicator does not address the second part of the target, related to access and benefit-sharing as well as traditional knowledge. These issues should be

		addressed based on internationally agreed rights and principles as reflected in the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), CBD and the related Nagoya Protocol on Access and Benefit-sharing. Hence, cross-reference should be made to the proposed indicator under target 15.6. on the adoption of legislative, administrative and policy frameworks for the implementation of the Nagoya Protocol
3.1.	Proportion of births attended by skilled health personnel	While the emphasis on skilled health personnel has strong human rights relevance, there may be a need to supplement this indicator to also address the complementarity with traditional birth attendants, as e.g. enshrined in UNDRIP, art. 24.1.
3.4.	Probability of dying of cardiovascular disease, cancer, diabetes, or chronic respiratory disease between ages 30 and 70	The indicator does not address the ambition of the target to promote mental health and well-being. Nor are there any other indicators under Goal 3 that address the issue of mental health. This is a serious gap, as the International Covenant on Economic, Social and Cultural Rights (ICESCR) explicitly recognises, in article 12.1. "the right of everyone to the enjoyment of the highest attainable standard of physical and mental health". A complementary, relevant and feasible process indicator could be the "proportion of the overall allocation for public health care that is allocated to mental health care".
3.9.	Population in urban areas exposed to outdoor air pollution levels above WHO guideline values	This is a people-centred and human rights-relevant indicator, which could double as indicator under target 11.6.
4.1.	Percentage of children/young people at the end of each level of education achieving at least a minimum proficiency level in (a) reading and (b) mathematics. Disaggregations: sex, location, wealth (and others where data are available)	The reference to "where data is available" should be deleted, as target 17.18. explicitly aims at building capacity for data disaggregation by 2020
4.7.	Percentage of 15-year old students enrolled in secondary school demonstrating at least a fixed level of knowledge across a selection of topics in environmental science and geoscience.	The indicator only addresses a few topics of the range of knowledge and skills areas mentioned in the target. One key area left out is human rights, in spite of very explicit requirements in the Universal Declaration on Human Rights and ICESCR for education to "strengthen the respect for human rights and fundamental freedoms". Given the universality of human rights, it will be easy to identify a selection of

		human rights topics, against which a fixed level of knowledge can be assessed, Hence, human rights should be mentioned specifically in the indicator along with environmental science and geoscience.
4.a.	Percentage of schools with access to (i) electricity; (ii) Internet for pedagogical purposes (iii) basic drinking water and (iv) basic sanitation facilities; and (v) basic hand washing facilities (as per the WASH indicator definitions)	The indicator should be strengthened to also address the disability and gender aspects of the target, particularly with regards to sanitation facilities.
5.2.	Proportion of ever-partnered women and girls (aged 15-49) subjected to physical and/or sexual violence by a current or former intimate partner, in the last 12 months Proportion of women and girls (aged 15-49) subjected to sexual violence by persons other than an intimate partner, since age 15	It is a weakness that the indicators do not capture violence against women beyond the age group 15-49 years The indicators do not capture the aspects of trafficking and other types of exploitation addressed in the target
5.3.	Percentage of girls and women aged 15-49 years who have undergone FGM/C, by age group (for relevant countries only)	The indicator is somewhat weakened by the focus on the particular age group (FGM may also happen at a much younger age, thereby making the reporting and response time unnecessarily long) and should be reported and addressed wherever it happens and not only in particular countries.
5.5.	Proportion of seats held by women in national parliaments Proportion of seats held by women in local governments	The indicators do not capture the aspect of participation and opportunities in economic life, as reflected in the target
5.a.	Share of women among agricultural land owners by age and location (U/R) The legal framework includes special measures to guarantee women's equal rights to land ownership and control.	The indicators do not capture the aspects of property, financial services, inheritance and natural resources, as implied in the target
6b	None	There is no indicator proposed for this target. An indicator should be developed with reference to the International Covenant on Civil and Political Rights (ICCPR) art. 25, and article 23 of the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), regarding the right and the opportunity to take part in the conduct of public affairs and the need for consultation, participation and free, prior and informed consent in the context of economic and social programmes.

8.7.	Percentage and number of children aged 5-17 years engaged in child labour, per sex and age group (disaggregated by the worst forms of child labour)	The indicator rightly addresses child labour, including the worst forms of child labour). However, the ambition of the target to eliminate forced labour is not addressed. Hence, a supplementary indicator to monitor progress in the eradication of forced labour needs to be developed.
9.1.	Share of the rural population who live within 2km of an all season road	The suggested indicator does not capture the aspects of affordable and equitable access, but solely the geographical distance to an all season road (availability). The indicator should be strengthened to address affordability and accessibility.
10.2.	Proportion of people living below 50% of median income disaggregated by age and sex	This indicator falls short of addressing the crucial human rights aspects of the target. Firstly, the indicator only addresses economic exclusion. Secondly, the indicator fails to address the equality aspect, as related to the range of prohibited grounds of discrimination mentioned in the target. From a human rights perspective, 10.2. is one of the most important targets and there is therefore a need to rethink this indicator, e.g. by measuring the progressive reduction of inequalities for the groups reflected in the target, as related to a selection of indicators across the SDG targets.
10.3.	Percentage of population reporting having personally felt discriminated against or within the last 12 months on the basis of a ground of discrimination prohibited under international human rights law	The proposed indicator is strong and human rights relevant, but should be supplemented with an additional process indicator to capture the elimination of discriminatory laws, policies and practices. See also comment under target 16.b.
10.4.	Labor share of GDP, comprising wages and social protection transfers.	The proposed indicator does not capture the process-oriented ambition of the target for adoption of policies to progressively achieve greater equality. The indicator should be replaced with a more relevant indicator.
10.7.	International Migration Policy Index	There is currently no public information available as to the substance of this indicator. It is therefore impossible to assess to what extent this indicator will allow for monitor of progress regarding the human rights of migrants
11.2.	Proportion of the population that has a public transit stop within 0.5 km	This indicator has similar shortcomings as the one proposed under target 9.1. It addresses availability, but not accessibility, affordability and safety for vulnerable groups, as specifically mentioned in the target.
11.3.	Efficient land use	The proposed indicator has only weak correspondence with the target and does not capture the aspects of inclusions and participation

11.7.	The average share of the built-up areas of cities in open space in public ownership and use	The indicator does not capture inclusiveness and accessibility for specific groups, as specified in the target. Also, the indicator does not take into account distribution of public areas across the city, which may be important in terms of accessibility.
16.3.	Percentage of victims of violence in the previous 12 months who reported their victimization to competent authorities or other officially recognized conflict resolution mechanisms (also called crime reporting rate) Unsentenced detainees as percentage of overall prison population	The proposed indicators address crucial aspects related to the rule of law and access to justice, but as these are such broad and multi-dimensional areas, and the target further emphasises an equality aspect of ensuring equal access to justice for all, there is a need for supplementary indicators to capture additional aspects. These could, for example, address recognition of the jurisdiction of customary law institutions in national legislation; access to remedy; access to legal aid etc.
16.6.	Primary government expenditures as a percentage of original approved budget Percentage of recommendations to strengthen national anti-corruption frameworks (institutional and legislative) implemented, as identified through UNAC Implementation Review Mechanism	The indicator addressing government expenditure is primarily assessing efficiency, thus largely irrelevant for the target, which aims at developing effective, accountable and transparent institutions. The second indicator is relevant for the transparency aspect of the target. Hence, the effectiveness and accountability aspects of the targets are only weakly addressed. As 16.6. is a key target that addresses the institutional capacity required for the realisation of the entire agenda, the first indicator should be replaced by an adequate indicator with a stronger focus on effectiveness and accountability. One such indicator could be the existence of an independent National Human Rights Institution in compliance with the Paris principles, as per UN General Assembly Resolution 48/134 of 1993.
16.10	Numbers of verified cases of killings, kidnapping, enforced disappearance, arbitrary detention and torture of journalists, associated media personnel, trade unionist and human rights advocates in the previous 12 months	This crucial human rights indicator addresses the issue of protection of the fundamental freedoms of opinion and expression. However, the "public access to information" aspect of the target is not necessarily addressed in the indicator. Hence, a complementary indicator of this fundamental aspect of human rights should be considered.
16.a.	Percentage of victims who report physical and/or sexual crime to law enforcement agencies during past 12 months Disaggregated by age, sex, region and population group	The proposed indicator is highly relevant under target 16.3., and should be retained. However, it does not address the target to "strengthen relevant national institutions". Also here, a relevant indicator would be the existence of an independent National Human Rights Institution in compliance with the Paris principles, as per UN General Assembly Resolution 48/134 of 1993.

16.b	Percentage of population reporting having personally felt discriminated against or harassed within the last 12 months on the basis of a ground of discrimination prohibited under international human rights law. Disaggregate by age, sex, region and population group	This is the same indicator proposed under target 10.3. The proposed indicator is strong and human rights relevant, but should be supplemented with an additional process indicator to capture the elimination of discriminatory laws, policies and practices, as intended in the target. See also comment under target 10.3.
17.14	Number of countries that have ratified and implemented relevant international instruments including environmental, human rights, and labour instruments	This is a key structural human rights indicator, and should include the range of human rights instruments explicitly and implicitly referenced across the SDG targets (see list compiled by the Danish Institute for Human Rights at www.humanrights.dk/sdg-guide