• SIDS are important partners for the EU and its Member States.

• We are working on connecting dots across many ongoing conversations of interest to SIDS and are fully involved as Team Europe.

• The EU and its Member States recognize that GDP alone cannot be sufficient to measure development progress. We welcome that in the proposed MVI-methodology, sustainable development is reflected in its three dimensions: economic, environmental, social.

On the proposed indicators:

• We took note that in the MVI-consultations of 28 April representatives of LDCs regretted that poverty is not part of the proposed 27 indicators. We heard the explanation by the panel that income levels are already taken into account in other existing indices. Still, we wonder if it is a good decision that poverty is not considered a vulnerability indicator in the draft MVI methodology.

• Indicator 1 ‘trade openness’ states that ‘countries that are open to trade are more vulnerable to suffer global economic shocks’. Isn’t this an undue generalisation?

• In indicator 7, ‘rainfall’ should be replaced with ‘precipitation’.

• Indicator 10 could be about droughts rather than drylands. The impacts go beyond food security and include for example energy production.

• For indicators 12 and 13, we believe that data from the countries themselves should be used, not only from their neighbours.

• Indicator 21, on tree cover is misleading, as it puts in the same basket monoculture plantations and biodiverse forests.

• There is no specific indicator on climate vulnerability. Is this crucial issue sufficiently reflected under the proposed environmental vulnerability indicators?

On the proposed vulnerability-resilience country profiles:

• We agree to the importance of the planned vulnerability-resilience country profiles, in which the national situation will be analysed, and which could serve as planning tools for IFIs and others. However, we are concerned about likely overlaps with the numerous existing country programmes, such as national development strategies, NDCs, and NAPs.

On the proposed governance options:

• We are not yet convinced that a new Secretariat is necessary, as the UN already has many agencies that could work deeply on the topic, e.g. UN DESA, UNHRLLS and UNDP. Having another
Secretariat could mean overlapping structures or mandates. A stronger cooperation with the Committee for Development Policy – which already uses various criteria, including vulnerability, to assess LDCs’ progress - might be an option.

On next steps:

• In the MVI report in June, it will be important to describe how the new index will fit together with going processes and how it could be used by national governments, IFIs, donors, and other stakeholders.

• We stand ready to further engage on the issues above. Please contact Martin.Kaspar@eeas.europa.eu