Written Comments from the Permanent Mission of the United States of America to the United Nations in New York in response to a briefing by the United Nations Department of Economic and Social Affairs on the potential development of a Multidimensional Vulnerability Index for SIDS

- We appreciate the efforts made by UNDESA to undertake extensive consultation, collect and analyze existing MVIs. We certainly applaud UNDESA's refraining from creating yet another MVI.

- Based on the recent presentation by the Office of the High Representative for Least Developed Countries (LDCs), Land-locked Developing Countries (LLDCs) and SIDS (OHRLLS) and UNDESA, it does not appear that any of the MVIs being reviewed include country policy and institutional assessments among the structural characteristics. The report should include the detailed composition of each MVI examined so that we can independently assess the composition, the weighting and other characteristics of the different indices.

- LDC status criteria already include two indices to complement the third criterion of GNI per capita, and, in our view those indices effectively reflect vulnerability, so that substituting an additional MVI that duplicates aspects of the present EVI and HVI would be both inadvisable and infeasible as a replacement for GNI per capita.

- Consistent with the 2030 Agenda's principle that countries have primary responsibility for their own development, is important that programme countries, including Middle Income Countries, commit to use of MVIs to inform their domestic policy and program choices and allocation of their domestic resources to leave no one behind, reach the furthest behind first. Absent such a commitment by developing countries to their use of MVI in this context, it would not be appropriate to consider its use exclusively for eligibility or allocation of external resources (concessional or otherwise). Development cooperation effectiveness depends on partner-countries' own commitment to leaving no one behind.

- The United States is aware of the strengths and shortcomings of the GNI per capita measure. However, we remain committed to its use of per capita GNI as the criterion for eligibility for and allocation of the most concessional finance in the institutional settings of the Multilateral Development Banks and the Organisation for Economic Cooperation and Development; and for debt the Paris Club and the G20. The proper fora to discuss eligibility and allocation measures are the respective governance structures for these institutions.

- We encourage the SG's Report to remain factual and avoid advocacy for adoption of any particular MVI for any institutional setting or any financial resource, other than with respect to UN resources.

- It would be wholly inappropriate for the SG's report to comment on the impact on Official Development Assistance of the application of the different MVI models, or advising countries on adjustments based on speculative loss of ODA allocations,

- We suggest instead considering making MVIs available for voluntary use by individual sovereign cooperation providers, including South-South Cooperators, and consideration by the relevant governing bodies of the institutions noted above.

- We are open to further discussion on use of a MVI within the United Nations Sustainable Development System for eligibility for and allocation of program resources available to the components of the UNDS.