28 November 2025

Dear members of the UN High-Level Expert Group on Beyond GDP,

On behalf of the MERGE consortium, we wish to congratulate you on the important work supporting the development of a global framework to measure societal progress beyond economic growth, emphasising the dimensions of wellbeing, inclusion and equity, and sustainability. We have read your interim report with great attention and we believe you are well on track to make a substantial contribution towards global convergence on the topic, while maintaining a strong level of ambition. Nonetheless, we have identified a few areas where we believe additional clarification or refinement could further strengthen the framework, and we would like to offer some suggestions and feedback in that regard.

With a consortium of leading institutions in the field, MERGE synthesises the research of four projects funded by Horizon Europe and European Research Council grants (SPES, ToBe, WISE Horizons, REAL) to **seek convergence in the multitude of beyond GDP indicators and policy frameworks**. Based on this expertise in research and policy, we offer our comments and feedback.

From a historical perspective, the United Nations has provided invaluable leadership for advancing the Beyond GDP agenda at the global level, with the Brundtland and the Stiglitz-Sen-Fitoussi reports standing out as some of the most important milestones along this path. While the UN Agenda 2030 and the Sustainable Development Goals (SDGs) provided an important step in this direction, this Expert Group has the unique chance of developing a new way of both conceptualising and measuring societal progress. What is needed is a resilient and ambitious framework that is capable of driving long-lasting change. In this context, we recommend building on existing commitments, and linking your work more directly with the topic of intergenerational fairness (including the Pact for the Future and the Declaration for Future Generations).

On the conceptual framework

At a conceptual level, we celebrate the choice of wellbeing, inclusion and equity, and sustainability as the central and interlinked pillars of your proposed framework for progress. In our own research, we have also identified significant convergence towards these three pillars (wellbeing, inclusion, sustainability) among the 90 most important 'beyond GDP' metrics. They can therefore provide fertile ground for such a framework. The emphasis on the role and quality of institutions and governance is also important and welcome.

We agree with the need for a new compass. When measuring sustainable and inclusive wellbeing, sustainability is typically defined broadly, with social, economic and environmental developments affecting future wellbeing. However, the biophysical limits of our planet are foundational to our future. Environmental sustainability (staying within planetary boundaries) is thefore primary priority, as a prerequisite for the others. The planetary boundaries must be an integral foundation of the measurement system proposed by the HLEG.

Lastly, we commend your recognition of interconnectedness across countries and encourage you to include this more prominently in future iterations of the measuring framework. This aspect is crucial to better acknowledge the unequal exchange between the Global North and South and the related environmental externalities. While we acknowledge the challenges of current data limitations (there is a recently launched Spillover Index, and indicators on consumption-based carbon and material footprints), we believe you are well-positioned for paving the way for improved data collection practices, also for other key indicators which may be missing globally. These processes could learn from academic databases such as WIOD, EXIOBASE, GLORIA, EORA, GTAP etc. However, it should also stimulate the databases produced by the European Commission (FIGARO), OECD (ICIO) and IMF (MARIO), in order to get consistent funding and more convergence in these data.

On the chosen domains and selection criteria

The chosen seven domains of current well-being are comprehensive. In the interim report, you wrote that "[w]ith well-being as the overarching frame, our group is exploring several indicators that can account for equity and inclusion, and sustainability." In this scenario, we are curious about the way forward, and whether a similar breakdown is expected for the other two pillars. If so, keeping the number of indicators contained will be challenging. If not, we believe that the current domains need to be realigned to incorporate the inclusion and equity, and the sustainability aspects. The outcome indicators related to sustainability should draw on the planetary boundaries framework.

Regarding the possible indicators, our researchers have identified that there is a surprising pre-existing consensus around metrics: by looking at 200 alternative indicators, we have quantified semantic similarities across them that led to the identification of 20 key components that efficiently capture the existing consensus. This list and the process of deriving it can serve to inform further consensus-building. We are pleased to see your suggested listed domains and outcome indicators already align with these to a large extent.

Our work on indicators continues around measurement and aggregation by organising a workshop for researchers and practitioners in February 2026 where we will synthesise knowledge and aim for a consensus on how to measure and how best to aggregate these components into summary indices without omitting critical information. The workshop will take place at the Joint Research Center (JRC) of the European Commission at Ispra, Italy. The JRC has been working on indicator measurement with the OECD for decades. This experience, together with their recently created and released sustainable and inclusive well-being dashboard will be essential as a starting point. This invitation will also be shared with the members of your group, and the results will be shared with you afterwards.

We would like to stress that an index approach can – and perhaps *should* - go hand in hand with providing a set of indicators (dashboard) and vice versa. Summary indicators have unique communication power, while sets of indicators are necessary to provide better insights into the underlying developments. There is no need to solely focus on one or the other, as illustrated by Figure 1. The dashboard in this figure provides an exemplary structure which illustrates how

summary indices and additional indicators could come together in a tripartite framework. The thematic domains are slightly different from the proposal.

We adjusted the theme '**Education**' to 'Education and Work'. Currently, in the proposal in paragraph 18, factors like job quality and access to leisure, are presented as being part of 'material wellbeing', while these are non-material phenomenona.

Health. In your suggestion, healthy life expectancy is considered as one example of outcome indicators. While healthy life expectancy is conceptually superior to its alternative "overall life expectancy", the latter is more unambiguously measured. At least in our understanding, healthy life expectancy either uses self-reported health status or reported disability status. The meaning of disability status may differ across countries, making the measure imperfectly consistent across countries. Moreover, non-healthy status is treated as an absorbing status, again creating interpretation problems for healthy life expectancy. Administrative data (health and complete social security records) may enable a more reliable measure, but it is not yet a common practice.

Environmental quality. We suggest changing the term 'environmental quality' to 'environment'. We would like to withhold from using the term 'quality' as it is a term that could be added to each domain.

Subjective well-being. We would propose to not consider a separate category called subjective well-being. In literature and in practice, see e.g. OECD Wellbeing Guidelines (2025), subjective well-being data reveal how people think about and experience their lives. In our view, this information is relevant to each dimension considered and should be an integral part of those. With the current set-up, it becomes confusing quickly where for example 'perceptions of safety, trust, and governance' are seen as part of subjective well-being, while the dimension 'governance' should also measure safety and security, for which self-evaluated indicators might be most appropriate. The same holds for a sense of belonging which is proposed to be part of 'social capital'. Subjective indicators should be presented next to objective indicators within the domains, where appropriate. It is not necessary, nor preferable, to present this separately. One exception might be made when it concerns a headline indicator. Life satisfaction could be used as one of the summary measures indices that capture average current wellbeing.

Social capital. We advise against the use of the term 'capital'. The capital approach signals that we are dealing with the sustainability pillar, which could be confusing.

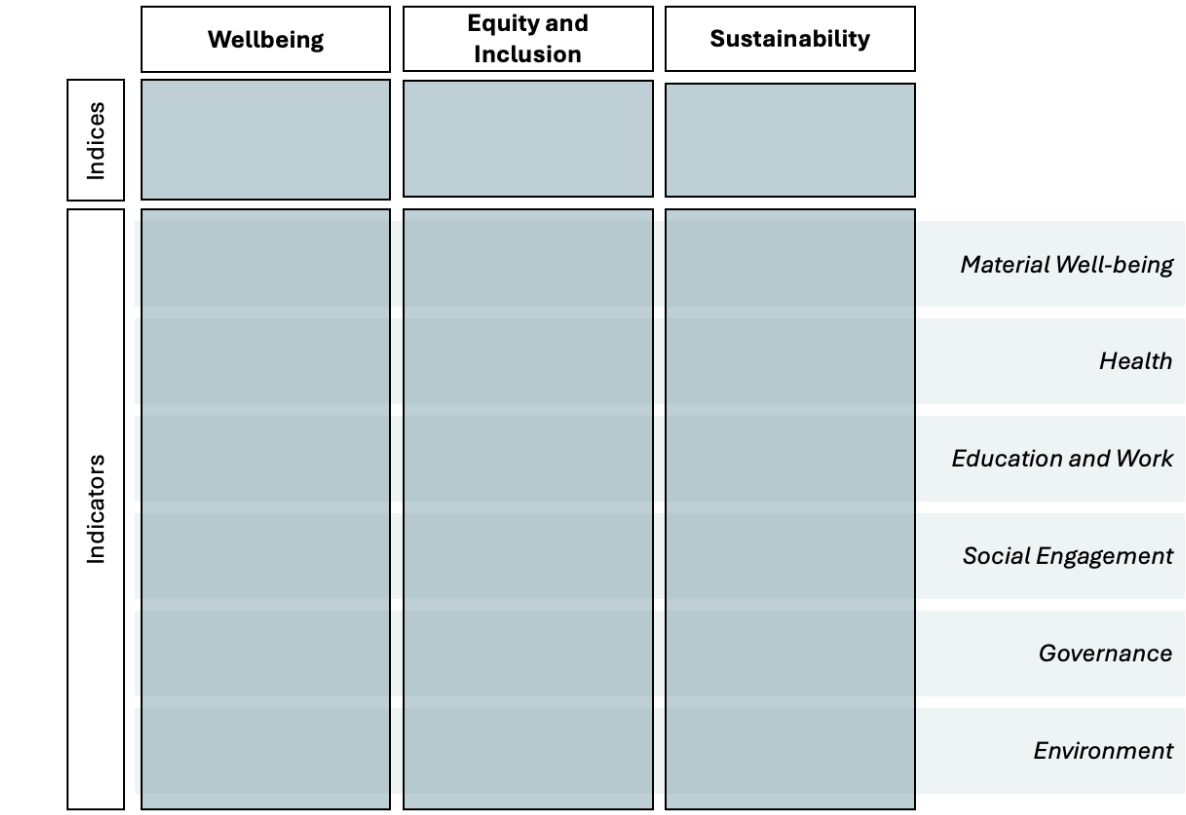

Figure 1. Dashboard image for measuring sustainable and inclusive wellbeing

We believe that understanding public support for the adoption of Beyond GDP is essential to ensure the political legitimacy of this agenda. Developing indicators that reflect and enjoy broad public backing is a critical enabler of the political process required to turn this vision into reality. To this end, as part of the MERGE initiative, we have conducted an EU-wide survey to assess citizens' preferences on the matter, using nationally representative samples of 67% of the European population.

We were encouraged to find that more than 80% of respondents support the adoption of Beyond GDP metrics and their use to guide policymaking; importantly, these were not merely stated preferences, as citizens demonstrated their commitment by offering donations to the Club of Rome and by signing a petition addressed to their respective heads of government. When asked about the contents of the indicators themselves, the majority of citizens expressed strong support for the Sustainable and Inclusive Wellbeing framework. 60% of respondents favoured indicators that either span all three areas of its three core dimensions jointly, or indicator sets that include specific measures for each three, separately. The two dimensions, wellbeing and sustainability, represent potential trade-offs between current and future generations. To gauge public preferences on this trade-off, we asked respondents to assess their relative importance: 85% considered the wellbeing of future generations to be equally or more important than that of the current generation.

In terms of thematic content, citizens prioritized indicators that reflect their country's performance in health, safety, jobs, education, housing and income— out of 14 domains and in

this order. We also asked in which proportions they would like to see indicators that reflect their country's specificity as opposed to universal indicators that allow their country to be compared with others. Nearly two thirds of respondents favour an indicator dashboard with an equal share or a majority of country-specific indicators. These preferences underscore that incorporating a meaningful country-specific component will be essential to secure public support and engagement before and after implementation.

On the adjusted GDP

We welcome the HLEG's recommendations to develop adjusted GDP measures that account for (i) the protective defensive nature of certain expenditures included in GDP, (ii) the concept of diminishing marginal utility when converting income or consumption into welfare, and (iii) the positive and negative externalities associated with the production and consumption of goods and services. These issues were central to one of the "technical deep dives" conducted within our MERGE project, which helped identify a research agenda focused on "adjusted GDPs." While such efforts can build on existing (extended) national accounts—for example, the Inclusive Income Measures developed by the UK's Office for National Statistics of the augmented national accounts by France's INSEE —they must also move beyond these frameworks to capture net utility experienced in the present and the broader costs and benefits of current economic activities. Specifically, within MERGE, we examined the Index of Sustainable Economic Welfare (ISEW) as a tool to quantify these concepts. Our findings indicate that in 2020, ecological costs related to economic activities in the EU27 amounted to as much as 40% of private consumption expenditures, while adjusting for decreasing marginal utility above certain income thresholds revealed inequality-related costs equivalent to about 25% of private consumption expenditures.

For augmented GDP measures, or consistent measures for the non-monetary and/or non-market-provided aspects of current well-being, the equivalent income (money metric utility) approach of M. Fleurbaey could prove to be extremely useful. This can also be extended to cover the dispersion of the underlying measures (see here for such an application).

On implementation and policy uptake

Lastly, we are very pleased to see the emphasis you have placed on impact. Increasing usability and policy uptake is one of our project's core priorities. As part of this effort, we have conducted a series of in-depth studies to explore how Sustainable and Inclusive Wellbeing indicators can support the implementation of concrete policy initiatives. A key insight that emerged from our work at the EU level is that policymakers need simple, actionable tools, and that outcome-based indicators are particularly effective for translating complex trade-offs into clear, usable insights. At the same time, it is important to assess outcomes for all parts of society, especially the bottom and the broad middle parts.

In the same spirit, we also welcome this open consultation on your interim report. We encourage you to extend this approach by engaging citizens directly—not only to understand what should be measured (what matters for them) but also to gather feedback on specific measures (for example, how much they are understood and trusted by people). Such consultations will ensure your work reflects diverse perspectives and real-world needs, while also fostering public support and legitimacy for the agenda.

We see these consultations incremental in tackling also beyond GDP skepticism in industrial and financial sectors and among entrenched political elites, addicted to the current growth-driven system. By presenting evidence informed narratives about the feasibility of the beyond GDP perspective while engaging a variety of stakeholders on community, national and global level to deliberate and envision alternative futures, you are in a strong position to succeed in creating global convergence.

We hope you find our feedback and comments useful. Once again, we would like to reiterate how pleased we are to see this process moving forward in such a promising direction, and we remain available to support you in any way you see fit. Whether at the technical, policy, or dissemination level, please do not hesitate to reach out to us.

With kind regards,

Dr. Tuuli Hirvilammi & Dr. Magalí Brosio, on behalf of the MERGE consortium