



# Joint Analysis “Union of Equality: Strategy for the rights of persons with disabilities 2021-2030”

## Focus on EU’s external action “Promoting the rights of persons with disabilities globally” (Section 6)

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### Introduction

The European Disability Forum (EDF) and the International Disability and Development Consortium (IDDC) advocate for the rights of persons with disabilities. The European Union (EU)’s 10-year Strategy for the Rights of Persons with Disabilities, [Union of Equality: Strategy for the rights of persons with disabilities 2021-2030](#), is a fundamental piece of the puzzle forming the vision and guiding the action of the EU, to ensure the rights of persons with disabilities, here in Europe and outside are respected, protected and fulfilled. The Strategy must enable the EU institutions and the Member States to take the most relevant actions to generate the most needed changes for eventually having a positive impact on millions of people around the world. The stakes are high! Persons with disabilities represent 15% of the world population, and 80% of them live in low- and middle-income countries, many of whom are caught in the vicious circle of disability-poverty.

Over the years EDF and IDDC have been engaged in dialogue with EU policy-makers, exposed situations, shared evidence, formulated recommendations; we have also specifically contributed to the consultations leading to this Strategy.

Focusing on Section 6 of the Strategy, relating to the EU’s external action, our overall conclusion is that the Strategy is incomplete and inconsistent, offering a disorganised and too narrow vision of the role the EU should take, and falling short on the specifics, with no clear timeline. The positive initiatives are patchy and disconnected from one another. Above all, many elements put forward in the Strategy are already in place, denying the fact that without any new ambition, and new resources, these are not going to deliver better results.

Since the adoption of the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) marker on disability by the EU, the proportion of new EU-funded projects that mainstream disability or address disability as their main focus remains very low<sup>1</sup>.

With this analysis, we present our key proposals and recommendations to reinforce the Strategy's external action component.

**This paper summarises our proposals and recommendations around four priorities: meaningful participation, coordination, means of implementation, and leadership. The Annex (from page 5, below) contains deeper analysis on these topics, as well as additional recommendations.**

## **Our Priority Recommendations for a more Impactful Strategy**

### **1. Operationalise Meaningful Participation**

The effective and meaningful participation of persons with disabilities and their representative organisations (DPOs) is an obligation under the UN Convention on the Rights of Persons with Disabilities (CRPD). As civil society actors representing the interest of a specific group of people, DPOs must be consulted in policy-making processes. But DPOs must also be enabled in the role of project-implementing partners, and involved in the planning, implementation and monitoring of EU programmes that concern them.

While the Strategy rightly underlines the importance of involving organisations of persons with disabilities, it fails to grasp all the forms such involvement should take, as it mainly focuses on the consultative role.

Accessibility is a primary requirement to ensure the meaningful participation of persons with disabilities and their representative organisations. No EU public money should be spent without guarantee that accessibility standards are respected.

EDF and IDDC recommend to:

- **set up a specific and inclusive process, a 'structured dialogue'**, to ensure participation of representative DPOs in the implementation and monitoring of the Strategy. This dialogue should take place in all relevant processes at EU, partner countries and global level, including in all EU overseas delegations, with an independent budget line and sufficient funding (in line with Article 11(2) of the Treaty on European Union, Article 4(3) of the CRPD and General Comment No. 7 of the CRPD Committee).
- invest rapidly in making **all EU Delegations fully accessible to and inclusive of** persons with disabilities.
- introduce a **standard accessibility requirement in the EU public procurement rules, and for all contractors and implementing partners of EU-funded programmes.**
- include DPOs in the EU Delegations' **local and regional civil society dialogues.**
- enable **DPOs to access funding** with, for instance, the creation of an intermediate body that allows these funds to be distributed among smaller organisations. This funding should provide technical, capacity-building, and training, as well as specific financial support to allow DPOs to sustainably build their governance structures and human resources. This would enable them to develop relevant expertise, to sit as

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<sup>1</sup> Under 15% in 2020 - exact figure will be reported in the upcoming OECD DAC annual results report.

equal partners around the table, and to meaningfully contribute to the Strategy and all relevant external action policy planning, funding programmes and activities.

## 2. Ensure capacity and effective coordination

The Commission needs to move away from the current system of under-resourced disability focal points, which is not effective. It is hoped that the new 'disability coordinators' mentioned in the Strategy, who will be nominated in all European Commission's Directorate Generals (DGs), EU External Action Service (EEAS), EU Delegations (EUDs) and other bodies and agencies, will be more effective, as they should play a key role to ensure the coherent implementation of the Strategy in line with the CRPD.

EDF and IDDC recommend that:

- **'disability coordinators' actively involve DPOs** in their work. A list of 'disability coordinators' should be publicly available, as it would improve transparency and accountability.
- each 'disability coordinator' has **sufficient human and financial resources**.
- 'disability coordinators' focusing on EU external action actively participate in the work of the **new Disability Platform**, to be established in 2021.
- the new Disability Platform puts issues related to external action, development cooperation and partnerships, and humanitarian action on its agenda, and involves DPOs.
- **a CRPD unit** (focal point) is created under the direct supervision of the Commissioner for Equality. It should be responsible for **coordinating the work of all 'disability coordinators'** and all external EUDs regarding the **implementation of the Strategy and the CRPD**.

Progress on disability-inclusive international cooperation will only happen when all actors involved are sensitised and incentivised to do it. Too little attention is given to capacity building in the Strategy.

EDF and IDDC recommend:

- more investment in regular **training and capacity building for EU staff**, including the 'disability coordinators', EUDs, DG European Civil Protection and Humanitarian Aid Operations (ECHO) field staff, and also for EU Member State agencies in partner countries, on the implementation of the Strategy and the CRPD,
- to extend training / capacity building to **implementing partners, including NGOs and DPOs**, with the view notably to improve their practices for disability inclusion in mainstreamed and targeted actions.

## 3. Provide means of implementation

Without framework and means for implementing and monitoring, the Strategy will be meaningless. Further details are now needed to establish plans for concrete actions, targets and indicators, and clear timelines, combined with an allocation of roles and responsibilities.

Using the OECD DAC disability policy marker to track disability-inclusive investments should be very useful to monitor progress, especially if the marker is applied consistently across the European Commission's wide portfolio of programmes.

More efforts to produce, collect, and analyse inclusive and intersectional data disaggregated by at least gender, age, and disability is needed to incentivise and support evidence-based disability-inclusive policy making and aid programming.

The immediate test for the Strategy's implementation is the ongoing process of programming relating to the Neighbourhood, Development and International Cooperation Instrument (NDICI) - Global Europe Instrument, including Team Europe's joint programming. The European Commission and the EU Member States must ensure that no EU aid is spent on any action that would jeopardise the rights of persons with disabilities; on the contrary it should enable these individuals to fully enjoy their rights.

EDF and IDDC recommend to:

- adopt an **EU action plan for its external action on promoting and respecting the rights of persons with disabilities**, including appropriate resources and how it will support partner countries to implement the CRPD.
- ensure that **development and humanitarian aid programming is CRPD-compliant**, both inclusive of and accessible to persons with disabilities and DPOs.
- systematically use an **intersectional approach and analysis** to support the design and implementation of EU programmes in partner countries.
- provide concrete and clear guidance to all relevant EU Directorates and services, including EU Delegations, on how to **systematically apply the disability marker across their programmes**, and encourage EU Member States to do the same, including through the Team Europe approach in partner countries.
- ensure that future recommendations (Concluding Observations) by the Committee on the Rights of Persons with Disabilities on the EU's implementation of CRPD Articles 11 and 32 are taken up in a mid-term review of the Strategy.

#### 4. Apply leadership where it can make a change

Given the position of the EU as the only regional body having ratified the CRPD, one of the largest donors of overseas development assistance (ODA), and a major trade partner of so many developing countries, the EU must lead by example and must apply its leadership as a champion of the rights of persons with disabilities where there is the greatest added value to generate substantial changes.

EDF and IDDC recommend that:

- urgently, the EU demonstrates leadership to promote the rights of persons with disabilities in global discussions relating to the **access to COVID-19 vaccination, and more globally to the COVID-19-response and recovery plans**.
- the EU commits to holding dialogues on disability rights with partners involved in the **EU-Africa Strategy, Eastern partnerships post-2020 and EU's engagement in Western Balkans**, and ensuring these frameworks are implemented in full compliance with the CRPD.
- the EU promotes much more systematic disability mainstreaming in the **monitoring and reporting mechanisms of the Agenda 2030**, including at the High-Level Political Forum.
- the EU supports and gets involved at the highest level in the recurrent **Global Disability Summit**, and proposes to co-host one such Summit within the 10 years of the Strategy.
- the European Commission and the Member States further engage in the **Global Action on Disability (GLAD) network** with a view to promote disability-inclusive donors' policies and practices. As one of the largest donors of ODA, the EU can only consolidate its credibility as a global disability rights champion, by being also a disability rights aid champion.
- the EU and its Member States oppose the adoption of any laws or policies at the **Council of Europe** that do not comply with the CRPD.

## Annex – Further Analysis and Recommendations

The joint analysis of the [Union of Equality: Strategy for the rights of persons with disabilities 2021-2030](#), by the European Disability Forum (EDF) and the International Disability and Development Consortium (IDDC), presents key proposals and recommendations to reinforce the Strategy's external action component around four priorities: meaningful participation, coordination, means of implementation, and leadership. This Annex contains deeper analysis on these topics, as well as additional recommendations.

### Positive elements

1. We very much appreciate that the Strategy for the Rights of Persons with Disabilities 2021-2030 is firmly based on the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The Strategy is comprehensive and has a lot of potential to improve the situation of persons with disabilities in the European Union (EU) and beyond, through EU external action, international partnerships, and humanitarian action.
2. We welcome that the Strategy is based on the CRPD and recalls the recommendations received by the EU from the United Nations (UN) Committee on the Rights of Persons with Disabilities in 2015.
3. The twin-track approach is confirmed, by which the EU will aim at combining targeted action on disability as well as disability mainstreaming in EU external action.
4. The Strategy is rightly stressing the need to improve accessibility as an indispensable element to strengthen the inclusion of persons with disabilities. We appreciate that accessibility will not only be brought up in policy dialogues, but also in concrete actions, information and consultations undertaken by the EU.
5. We welcome the call for reinforcing collaboration amongst the EU institutions, and with the Member States too, notably for ensuring the mainstreaming of disability in EU policies, and enhancing efforts to implement the CRPD. Very positive is also the commitment to organise “regular high-level meetings between the European Parliament, the Council, the Commission and the European External Action Service (EEAS), involving representative organisations of persons with disabilities”, during which we hope that development and humanitarian issues will be addressed.
6. We welcome the nomination of ‘disability coordinators’ in all European Commission Directorates-Generals (DGs), EEAS, EU Delegations (EUDs) and other bodies and agencies (such as FRONTEX and the European Asylum Support Office (EASO)) responsible for the EU’s global role in CRPD promotion. These disability coordinators are also an essential mechanism to ensure a focused and coherent implementation of the Section 6 of the Strategy.
  - EDF and IDDC recommend for the **disability coordinators to actively involve persons with disabilities and their representative organisations (DPOs)** in their work. A list of ‘disability coordinators’ should be publicly available as it would improve transparency and accountability. Each ‘disability coordinator’ should have **sufficient human and financial resources** to effectively coordinate the implementation of the CRPD, including in EU external action.
  - EDF and IDDC recommend that the ‘disability coordinators’ focusing on EU external action should actively participate in the work of the **new Disability Platform**, to be established in 2021. This Platform should be a structure that transforms inclusive disability policy making. It should involve DPOs and also have the EEAS and the

EUDs participating. It should put issues related to external action, development cooperation and partnerships, and humanitarian action on its agenda.

7. There are valuable commitments to create or revise tools to support more disability inclusive policy-making, such as the integration of considerations about the impact on the realisation of the rights of persons with disabilities in the Better Regulation toolbox, the impact assessment and evaluation processes, the update of the Declaration of Competences. We welcome the update of the Toolbox on the “Rights Based Approach, encompassing all human rights for EU development cooperation” to address all inequalities, including discrimination against persons with disabilities, in external actions”. We also welcome the inclusion of disability rights in EU trade policy, in particular in the revision of the EU's Generalised Scheme of Preferences regulation. Both should be done with input from national and local DPOs based in the countries where these investments are being made.
8. EDF and IDDC welcome the EU's renewed commitment to use the OECD Development Assistance (DAC) disability policy marker to track disability inclusive investments, and encourage the European Commission to provide clear guidance on how to apply the disability marker across its wide portfolio of programmes to ensure coherence in its implementation by the different EU institutions and EU Delegations involved.
9. Intersectionality is established as a core element of the Strategy's vision to scale up the fight against discriminations. This is a strong and welcomed commitment. Relevant connections are made with the EU Gender Action Plan and the EU Action Plan on Human Rights and Democracy, while mutual connections for implementation and addressing intersectionality in all targeted actions need to be further developed.
10. With this Strategy, the ambition of the European Commission is to enhance the EU political profile as a leading disability rights advocate in the global scene. A great emphasis is placed on the role of the EU in multilateral fora and policy dialogues with partner countries. We welcome this willingness to invest efforts to share good practices and bring disability rights on the agenda of multilateral and regional integration fora. The objective to present an EU candidate to the UNCRPD committee is a good move forward.
11. We welcome the recognition of the importance of involving persons with disabilities and cooperating with civil society in EU humanitarian aid as well as supporting them with capacity building, extending this to wherever EU humanitarian funding is allocated - for example, pooled-funds, UN agencies, the EU itself as well as the traditional NGO partners. We also appreciate the promotion of the Washington Group short set of Questions for the collection of disability disaggregated data.

## Gaps

12. The language of the Strategy is not consistently compliant with CRPD (mainly outside of the section on external action). For example, the Commission “calls on Member States to take account of specific needs of persons with disabilities in all policies to be dealt with at Council level and in Council conclusions (disability mainstreaming)”, instead of referring to the rights of persons with disabilities.
  - EDF and IDDC recommend for the Strategy and all its planned activities to **be implemented in line with the human rights-based approach to disability and the CRPD.**

## Superficial understanding of meaningful participation of DPOs

13. We welcome the commitment to involve organisations of persons with disabilities in the Strategy's implementation. However, in the Strategy, including in Section 6, the way the Commission deals with its CRPD obligation to meaningfully involve persons with disabilities, via their representative organisations (DPOs), is incomplete and superficial. The Commission centres its efforts mostly on organising consultation in policy processes. No mention is made of the role of DPOs as implementing partners, although DPOs should be involved from beginning to end, in the planning, implementation, and monitoring of EU programmes that concern them.
14. Section 6 of the Strategy does not address the need to invest in strengthening the capacity of persons with disabilities and DPOs as advocates, watchdogs, and partners in EU policy-making, only touching upon it in relation to the delivery of EU-funded humanitarian aid.

EDF and IDDC recommend for the EU to

- **set-up a specific and inclusive process, a “structured dialogue”** to ensure participation of representative DPOs in the implementation and monitoring of the Strategy. This dialogue should take place in all relevant processes at EU, partner countries and global level, including in all EU overseas delegations, with an independent budget line and sufficient funding (in line with Article 11(2) of the Treaty on European Union and Article 4(3) of the CRPD).
  - invest rapidly in making all **EU Delegations fully accessible to and inclusive** of persons with disabilities.
  - introduce a **standard accessibility requirement** in the EU public procurement rules, and for all contractors and implementing partners of EU-funded programmes.
  - include DPOs in the EU Delegations' local and regional **civil society dialogues, and enable DPOs to access funding**, with, for instance, the creation of an intermediate body that allows these funds to be distributed among smaller organisations. This funding should provide technical, capacity building, and training, as well as specific financial support to allow DPOs to sustainably build their governance structures and human resources. This would therefore enable them to develop relevant expertise, to sit as equal partners around the table and to meaningfully contribute to the Strategy and all relevant external action policy planning, funding programmes and activities.
15. We regret that the Strategy does not call for the establishment of a CRPD unit to ensure coordination of the CRPD through all 'disability coordinators' both at the EU level, and regarding its external action; this CRPD unit is still missing from the EU's approach. While the Strategy does pay attention to mainstreaming (such as committing to systematic references to the CRPD in all relevant policy fields or staff training on disability rights), without strengthened human and financial resources within the Commission, or the establishment of a strong and influential CRPD focal point, this will not be achieved.
- EDF and IDDC recommend the **creation of a CRPD unit** (focal point) in DG for Justice and Consumers, under the direct supervision of the Commissioner for Equality, consistent with how other equality issues are handled. This should promote an intersectional approach to the rights of persons with disabilities. The CRPD unit should be responsible for **coordinating the work of all disability coordinators** in EU institutions, agencies and bodies, including EEAS and all external EU delegations regarding the **implementation of the Strategy and the CRPD**.

## Lack of initiatives towards promoting disability inclusion to implementing partners

16. The European Union is one of largest international donors. The Strategy does not include a vision for guiding NGOs, the UN and other development and humanitarian partners to improve their strategies and practices and play an active role in addressing the rights of persons with disabilities in their implementation of EU-funded programmes.

- EDF and IDDC recommend the EU to commit that **all its overseas development and humanitarian spending be fully inclusive and accessible to persons with disabilities**. Guidance and incentives should be provided to ensure that all relevant funding - through budget or sector support, multilateral programmes, calls for tenders - implemented by NGOs, UN agencies and other development and humanitarian partners, is fully inclusive of persons with disabilities. This should be measured by the DAC disability marker to track progress over time.

17. **Training:** The provision relating to staff training and/or capacity building is insufficient. Training is only mentioned in relation to staff “preparing initiatives on the UNCRPD”, but there is nothing about training staff of the European Commission Headquarters and in particular for the ‘disability coordinators’, the EU Delegations (EUD), or the ECHO field staff on disability rights mainstreaming (missing one component of the twin track approach). Section 6 highlights the increased responsibilities for example for EUDs in “supporting the implementation of the UNCRPD and fostering global ratification” and to “provide technical assistance to partner countries”.

EDF and IDDC recommend

- To invest more in regular **training and capacity building for EU staff**, including the disability coordinators, EUDs, ECHO field staff and also for EU Member State agencies in partner countries on the implementation of the Strategy and the CPRD, while be knowledgeable about EUs priorities in promoting CRPD worldwide: engagement with DPOs, OECD DAC marker, data disaggregation, etc.
- That training / capacity building must be **extended to implementing partners**, including NGOs and DPOs, for building awareness and improving practices for disability inclusion mainstreaming and targeted actions.

## Lack of people-centred approach

18. Section 6 of the Strategy is not sufficiently people-centred. It remains largely policy-focused, with much greater details about how to enhance the EU’s international profile, than where and how to act to address the different barriers faced by persons with disabilities in partner countries and across the different sectors.

19. The Strategy offers a very limited analysis of the situation of persons with disabilities in partner countries. Inclusive and intersectional data is key for inclusive programming as well as for evidence-based policy making.

EDF and IDDC recommend for the EU to ensure that

- **persons with disabilities, including women and girls with disabilities, are counted in its external action**, development cooperation and humanitarian action, by disaggregating data by disability type and gender.
- EU delegations and EU Member States use an **intersectional approach and analysis** which includes a disability lens to support the design, implementation, and monitoring of disability-inclusive programmes.

- **intersectional analysis at partner country level** includes the systematic collection of data disaggregated by at least gender, age and disability. Such an intersectional approach should also be used for the Programming and the Team Europe initiatives, the CSO Roadmaps, the Human Rights and Democracy Country Strategies, the Country Gender Profiles.

### **Too little about the importance of disability-disaggregated data**

20. Positively, the Strategy promotes the use of Washington Group questions in humanitarian settings. However, this is far too little and puts an optional responsibility on partners rather than a commitment from ECHO. No measure is brought forward to improve and systematise disability-disaggregated, globally comparable, data collection in development cooperation programmes, in spite of CRPD obligations and the 2015 CRPD Review's Concluding Observations.

Precise data is not only key to give programming the best direction to reach out to the right persons and design the most impactful interventions, good data is also fundamental for more inclusive policy. Also, without data, it is going to be impossible to realise the Strategy's vision on intersectionality.

21. Inclusive and intersectional data disaggregated by at least gender, age, and disability is key for inclusive programming as well as for evidence-based policy making. EDF and IDDC appreciate the EU's increased commitment to collect disaggregated data in its humanitarian action, and recommend it to go further and ensure the investment is also made for its international cooperation and partnerships.

22. While the Commission is committing to continue using the OECD Development Assistance Committee (DAC) disability marker to track disability-inclusive investments, the Strategy does not sufficiently elaborate on how the DAC marker will be enforced in all policies and programmes, and what use the Commission will do of this data. Also missing is encouragement to the EU Member States to also use the disability marker.

EDF and IDDC recommend to

- systematically use an **intersectional approach and analysis** to support the design and implementation of EU programmes in partner countries.
- provide concrete and clear guidance to all relevant EU Directorates and services, including EU Delegations, on how to **systematically apply the disability marker across their programmes**, and encourage EU Member States to do the same, including through the Team Europe approach in partner countries.

### **Insufficient information about implementation and resources**

23. **Implementation Plan:** In order to build and consolidate its credibility as a leading disability rights advocate, the EU will have to give itself the means to deliver this leadership through concrete actions, programmes and partnerships in partner countries, and demonstrate results and progress.

Yet, in spite of some isolated, specific action points, the Commission remains very vague about the implementation of the Strategy. There is no mention of preparing an action plan with clearer targets and indicators, or sharing of responsibilities. There is also limited information on how the Strategy will be reviewed and monitored. There is for example no mention of a mid-term review and evaluation of the Strategy to allow for adjustments of the actions if needed.

A monitoring framework will be set up in 2021. However, the existing EU CRPD monitoring framework should also play an important role in monitoring the

implementation of the Strategy. It should therefore receive independent funding for its functioning and for the establishment of a secretariat.

EDF and IDDC recommend to:

- adopt an **EU action plan for its external action on promoting and respecting the rights of persons with disabilities**, including appropriate resources and how it will support partner countries to implement the CRPD.
- ensure that **development and humanitarian aid programming and partnerships are CRPD-compliant**, and both inclusive of and accessible to persons with disabilities and DPOs.
- genuinely apply the human rights-based approach (HRBA) in EU policies and aid programming and ensure that this is effectively integrating disability rights. The Commission should monitor how the HRBA has effectively enabled progress towards disability inclusion, as part of the monitoring of the implementation of the Strategy.

24. **Funding:** The Strategy indicates that the Neighbourhood, Development and International Cooperation Instrument (NDICI)-Global Europe 2021-2027 will “contribute to the implementation of the external objectives of the Strategy”. However, the Strategy comes late to influence this fundamental process. The negotiations on the Regulation establishing the NDICI - or Global Europe - are completed. The phase for programming NDICI geographic and thematic funding is currently ongoing - but at least at the level of the partner countries the programming consultations are mostly completed. To make effective progress, programming of the EU’s funding for international cooperation and humanitarian action must apply a human-rights based approach, and must be disability-inclusive and CRPD-compliant.

EDF and IDDC recommend:

- that **dedicated funding is made available** to implement the external objectives of the Strategy, and **to turn the commitments into concrete actions**.
- **ECHO funding is monitored with regards to disability inclusion**, in particular on how ECHO implementing partners take into account the Inter-Agency Standing Committee (IASC) Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action.

25. The EU is not making an explicit and general commitment that EU funds will not support actions that create or exacerbate barriers and contribute to the segregation or exclusion of persons with disabilities. This should not be only the responsibilities of the Member States, as stated.

- EDF and IDDC recommend for the EU to monitor that all EU-funded actions for international development **uphold the principles of accessibility, dignity and the inclusion of persons with disabilities in the community**, and that local, national and regional representative organisations of persons with disabilities are consulted and involved in the development of policies and programmes.

26. **Team Europe - Working Better Together:** The EU is promoting a Team Europe approach of working better together in partner countries - with EU delegations, EU Member States and implementing agencies, and European Development Finance institutions - through joint programming, joint implementation and joint monitoring. However, there is no reference to the Team Europe approach anywhere in the Strategy.

- EDF and IDDC recommend for **the rights of persons with disabilities to be fully included in Team Europe’s global response to COVID-19, as well as all future Team Europe joint programming**, implementation and vaccination plan.

### Gaps in the vision for the EU’s increased leadership

27. One strategic approach that is brought forward in the Strategy in relation to external action is to increase the EU leadership as an advocate for the rights of persons with disabilities on the global scene. Given the position of the EU as the only regional body having ratified the UNCRPD, one of the largest donors of overseas development assistance (ODA), and a major trade partner of so many developing countries, IDDC and EDF greatly welcome this ambition.

However, the scope of application of this leadership, as described in the Strategy, risks being far too narrow to allow this “leadership” to generate substantial changes.

In relation to the EU’s increased leadership for disability rights promotion on the global scene in the “CRPD community”, the Strategy does not mention the Global Action on Disability (GLAD) network at all, even though the Commission and several EU Member States are GLAD network members. Yet, this platform is a key tool to share and encourage donors’ good practices.

28. No reference is made either to ensuring that the EU-Africa Strategy, Eastern partnerships post 2020 and EU’s engagement in Western Balkans are CRPD-compliant instruments promoting the rights of persons with disabilities globally.
29. Likewise, no mention is made of the Global Disability Summit, though it is emerging as a recurrent space for policy dialogue and commitments; the next one being organised by the Government of Norway in 2022. In the EU’s plan for increasing its leadership on the global scene, the EU could propose to co-organise a Global Disability Summit in the future, taking place in the EU.
30. No mention is made of the Council of Europe: EU and its Member States should not agree to any laws or policies of the Council of Europe that go against the CRPD.
31. Beyond the disability policy sector, the EU’s leadership for disability rights promotion would have significant impacts if it would apply at the level of the monitoring and reporting mechanisms of the Agenda 2030, especially the High Level Political Forum – a key forum for the global, mainstream development community. But no mention is made of this.
32. Urgently, leadership is needed now to promote the rights of persons with disabilities in relation to the access to COVID-19 vaccination, and more globally to the COVID-19-response and recovery plans.

In the EU’s plan for increasing its leadership on the global scene, EDF and IDDC recommend that

- the EU urgently demonstrates leadership to promote the rights of persons with disabilities in global discussions relating to the **access to COVID-19 vaccination, and more globally to the COVID-19-response and recovery plans.**
- the EU commits to holding dialogues on disability rights with partners involved in the **EU-Africa Strategy, Eastern partnerships post 2020 and EU’s engagement in Western Balkans**, and ensuring these frameworks are implemented in full compliance with the CRPD.

- the EU promotes much more systematic disability mainstreaming in the **monitoring and reporting mechanisms of the Agenda 2030**, including at the High Level Political Forum.
- the EU supports and gets involved at the highest level in the recurrent **Global Disability Summit**, and proposes to co-host one such Summit within the 10 years of the Strategy.
- the European Commission and the Member States further engage in the **Global Action on Disability (GLAD) network** where to promote disability-inclusive donors' policies and practices. As one of the largest donors of ODA, the EU can only consolidate its credibility as a global disability rights champion advocate, by being also a disability rights champion donor.
- the EU Member States hinder the adoption of any laws or policies at the **Council of Europe** that do not comply with the CRPD.

33. **Humanitarian aid and disaster risk reduction:** There is no mention in the Strategy on the implementation of the new ECHO “Guidance note on the inclusion of persons with disabilities in EU-funded humanitarian aid operations” in line with the Charter on Inclusion of Persons with Disabilities (2016) and the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action (2019).

The Strategy also fails to mention the full and effective implementation of the Sendai framework for disaster risk reduction (DRR) 2015, by using and improving the Sendai framework EU action plan.

EDF and IDDC recommend the EU to implement

- the new **ECHO “Guidance note on the inclusion of persons with disabilities in EU-funded humanitarian aid operations”** in line with the Charter on Inclusion of Persons with Disabilities (2016) and the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action (2019).
- the **Sendai framework for disaster risk reduction (DRR) 2015**, by using and improving the Sendai framework EU action plan.

34. **Climate justice:** Although the Strategy (5.6) recognises the impact of climate change on persons with disabilities and the need to ensure that the green transition is fully inclusive, there is no explicit mention of this as part of EU external action (Section 6).

EDF and IDDC recommend that

- strategic commitments to disability inclusive and participatory external action apply equally to implementation of the **new EU Strategy on Adapting to Climate Change (2021)**, ensuring that persons with disabilities, through their representative organisations, are meaningfully engaged in climate governance and that all global climate mitigation and adaptation policies and programs are fully accessible.