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# European Disability Forum (EDF) submission to the public consultation:

# European Commission financing instruments for external action[[1]](#footnote-2)

*20th June 2023*

## The European Disability Forum

[European Disability Forum](https://www.edf-feph.org/) (EDF)is an umbrella organisation of persons with disabilities that defends the interests of Europeans with disabilities. EDF is a strong, united voice of persons with disabilities in Europe. EDF also plays an active role in ensuring persons with disabilities and their representative organisations are included in European Union (EU) external action.

For more information, contact Marion Steff, International Cooperation Manager: marion.steff@edf-feph.org

## Introduction

This submission provides inputs to the public consultation on European Commission (EC) financing instruments for external action. The submission is tightly focused, reflecting EDF’s core expertise :

* The submission focuses specifically on the Neighbourhood, Development and International Cooperation Instrument (NDICI): it does not seek to comment on other instruments.
* The submission focuses on direct steps that should be taken to align Official Development Assistance (ODA) spending with the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD). While wider aspects of the design and implementation of the NDICI, such as the use of ODA in blended finance, may also have an indirect bearing on the enjoyment of rights by persons with disabilities,[[2]](#footnote-3) these wider aspects are beyond the scope of this submission.

The main body of the submission makes overarching comments on the design and implementation of the INFF. Annex 1 makes some more specific comments relating to Question 5 of the EC’s evaluation questionnaire. Annexes 2 and 3 present the results of some more detailed analysis of relevant qualitative and quantitative data.

## Upholding the rights of persons with disabilities in ODA programmes

Ensuring that persons with disabilities participate in ODA programmes on an equal basis with other people is not only a basic matter of social justice. It is also a human rights obligation under the UN CRPD, to which the EU is a State Party : for example, CRPD Article 32 deals explicitly with international cooperation, and sets out the need for such cooperation to be « inclusive of and accessible to persons with disabilities ».[[3]](#footnote-4) Inclusion of persons with disabilities is also embedded in the 2030 Agenda, both through specific references to disability, and through the overall principle that « no one will be left behind ».[[4]](#footnote-5)

It is estimated that as at 2021, there were 1.3 billion persons with disabilities worldwide, and that nearly 80% of these people lived in low- and middle-income countries.[[5]](#footnote-6) Persons with disabilities are over-represented among people living in poverty, due to the cumulative impact of other inequalities.[[6]](#footnote-7) Ensuring that persons with disabilities participate equally in ODA programmes is thus crucial for eradicating poverty.

The European Strategy for the Rights of Persons with Disabilities recommits the EU to « uphold the human rights of persons with disabilities and support their social inclusion in all international relations, and as part of all external action, policy planning, funding programmes and activities ».[[7]](#footnote-8) The rights and inclusion of persons with disabilities are also referenced in numerous other EU external policies.[[8]](#footnote-9)

For all these reasons, it is essential that the EC take deliberate steps to ensure persons with disabilities can participate in all NDICI-funded programmes on an equal basis with other people.

## EDF’s position on adoption of the NDICI

When the NDICI was adopted in 2021, EDF strongly welcomed the fact that the NDICI explicitly included persons with disabilities.[[9]](#footnote-10) For example, Article 8 of the NDICI says that « the NDICI instrument shall apply a rights-based approach encompassing all human rights to support the right holders in claiming their rights, with a focus on poorer, marginalised and vulnerable people and groups, **including persons with disabilities. »[[10]](#footnote-11)**

At the same time, EDF highlighted several areas that would need attention in order for this principle to be put into practice and to help ensure that all NDICI programming complies with the UN CRPD. These included :

* Ensuring that persons with disabilities and their representative organisations participate fully at all stages of NDICI programming (both country and regional);
* Ensuring that all NDICI programming, Team Europe initiatives and joint programmes are based on an intersectional analysis, and that a twin-track approach (which combines disability mainstreaming with targeted initiatives) is used.
* Ensuring that data are collected (including disability-disaggregated data) to monitor progress.[[11]](#footnote-12)

## Implementation of the NDICI since 2021

**Caution:** within the time and resources available, it was not possible to do a comprehensive study of how far the NDICI has been implemented in a way that aligns with the UN CRPD. Instead, this section presents a few key pieces of evidence that can offer some important clues.

### 4.1 Positive developments

The EC has taken some positive steps that could help align NDICI programming with the UN CRPD. These include :

* Rapidly adopting the Organisation for Economic Cooperation and Development-Development Assistance Committee’s (OECD-DAC’s) **policy marker** for tracking the inclusion of persons with disabilities in Official Development Assistance spending.[[12]](#footnote-13) In addition, the EC has incorporated an indicator in its overall results framework to monitor the share of projects awarded positive scores on the OECD-DAC disability policy marker.[[13]](#footnote-14)
* Publishing **guidance** on making consultations and dialogues inclusive and accessible for all ; and on disability inclusion in external action.[[14]](#footnote-15) (Note : for the purposes of this submission, the practice note on consultations and dialogues was not reviewed in detail).

### 4.2 Concerns

However, there are also some warning signs that the EC’s approach to aligning NDICI programming with the UN CRPD is not yet consistent. Key concerns include that:

* There is no systematic process for **consulting persons with disabilities** and their representative organisations, either in Brussels or through EU Delegations in Global South countries.[[15]](#footnote-16) For instance, organisations of persons with disabilities are not systematically included in the EU Human Rights Dialogues for consultation, happening in countries.[[16]](#footnote-17) In addition, DPOs face barriers in accessing EU funding (see Annex 1 for more details).
* Whereas the EC’s work on gender equality in international cooperation is driven by a detailed Gender Action Plan,[[17]](#footnote-18) the EC **does not have an action plan** on the rights of persons with disabilities in international cooperation programming.[[18]](#footnote-19)
* Although the EC results framework includes an indicator on the disability marker (which tracks projects’ intentions on disability inclusion), the results framework **does not systematically** **track disability inclusion in project outcomes or impacts**. Only one impact indicator (on unemployment rates) explicitly mentions disability.[[19]](#footnote-20) The results framework says that disability-disaggregated results data should be reported « where relevant and possible », but does not explain how this will be judged.[[20]](#footnote-21)
* A rapid review of NDICI **Multiannual Implementation Programmes** (MIPs) for specific countries and regions suggests that the rights of persons with disabilities are not yet included comprehensively (see Annex 2 for further details).
* The most recent **data from the OECD-DAC disability policy marker** suggest that the EC’s performance in including persons with disabilities in its international cooperation spending has been improving but remains mixed (see Annex 3 for further details).
* Finally, EDF’s past research – jointly with the European Network on Independent Living – has found that there is a lack of information on how far EU international cooperation funding supports **independent living and deinstitutionalisation**.[[21]](#footnote-22) Until better information is available, it will be hard to be confident that NDICI funding is never used in ways that reinforce segregation and contravene the CRPD.

## Recommendations

EDF recommends that:

1. Persons with disabilities and their representative organisations should be **closely consulted and actively involved** in all stages of NDICI programming. This should include those from under-represented groups (i.e. those who may be less prominent in policy processes due to severe accessibility and attitudinal barriers : depending on the context, examples might include neurodiverse persons or persons with deafblindness) as well as those experiencing intersecting discrimination (e.g. women with disabilities, persons with disabilities from minority ethnic groups). Barriers that prevent disabled people’s organisations (DPOs) from obtaining EU funding – including accessibility barriers – should be removed (see Annex 1 below).
2. The EC should adopt a **disability action plan** setting out in detail how it will align all NDICI spending with the UN CRPD, following an intersectional approach. The disability action plan should also pay particular attention to accessibility and should set out plans for ensuring that all EU-funded procurement processes and programmes are compliant with Article 9 of the UN CRPD (accessibility). To this end, where possible, state-of-the-art accessibility requirements and standards must be considered in cooperation with representative organisations of persons with disabilities and accessibility professionals on the ground.
3. The EC should put in place a system of **human rights-based indicators** to track the NDICI’s alignment with the UN CRPD. The system should include collection of disability-disaggregated data using the Washington Group Questions and should also include other measures to capture qualitative dimensions and to cover constituencies not fully included in standard data disaggregation tools.[[22]](#footnote-23)
4. All key NDICI **programming documents**, including MIPs, as well as all Team Europe and Joint Programming documents, should include concrete measures to ensure that all aspects of programmes align with the UN CRPD, taking full account of intersectionalities, and following a twin track approach.
5. The EC should set aside dedicated **budgets** to cover the costs of making programmes inclusive of and accessible to persons with disabilities. For instance, funding should also be allocated to the cost of sign interpretation, captioning, personal assistant and adapted transportation.
6. The EC should ensure that checks are in place to prevent EU ODA funding being used for measures that **contravene the CRPD**. It should instead make use of NDICI funding to support deinstitutionalisation.

## Annex 1 : further comments on question 5

**Question 5 : Has it become easier in the past two years to access EU funds for external cooperation?**Disabled people’s organisations (DPOs) continue to experience barriers to accessing EU funds. This is partly because procedures are not fully accessible.[[23]](#footnote-24) It is also because of wider barriers. We echo CONCORD’s recommendations that civil society organisations should have more opportunities to apply for funding across all NDICI geographic and thematic programmes; that longer-term funding should be possible ; and that more core funding should be available to civil society organisations.[[24]](#footnote-25) We also echo the Human Rights and Democracy Network’s previous recommendations that more proactive steps should be taken to reach out to grassroots organisations, and to support organisations that are unregistered.[[25]](#footnote-26)

## Annex 2 : rapid review of multiannual implementation programmes

As part of the research for this submission, a very rapid review was undertaken on 88 multiannual implementation programmes (MIPs) covering specific countries and regions.[[26]](#footnote-27) The review focused on MIPs’ plans for disability inclusion in ODA programming, as opposed to policy dialogue, in line with this submission's focus on ODA spending.

The review was limited, and mainly involved searching the documents for explicit references to « disability »/ « disabilities »[[27]](#footnote-28). This approach means that two cautions are needed :

* First, if this was a full-scale research project aiming at a more exhaustive assessment, it would have been necessary to search for other terms too, including sector-specific terms such as « inclusive education », and terms relevant to specific sub-groups of the population of persons with disabilities, such as « blind ». The detailed findings from the review should therefore be treated with some caution: it is possible that some of the results stated below would be a little higher if a wider range of search terms had been used. However, the main aim of the review was to look for evidence of disability **mainstreaming**, and it seems implausible that a MIP seeking to mainstream the rights of persons with disabilities in their diversity, across all sectors, would not use the term « disability » in describing its plans. In the context of this rapid review, searching on « disability »/ « disabilities » was thus considered a reasonable proxy.
* A second caution is that the review did **not** involve making a complete assessment of how far the programmes set out in the documents were likely to respect, protect and fulfil the rights of persons with disabilities. For example, the review did not examine whether proposed measures were likely to benefit all persons with disabilities equally, or whether they might sideline some persons with disabilities experiencing intersecting or more extreme inequalities. The review also did not consider whether any parts of the documents could be *detrimental* to the enjoyment of all rights by all persons with disabilities. The results should therefore be treated as very tentative.

But with these caveats, the key observations were that:

* Positively, the **majority of MIPs (around 73%)[[28]](#footnote-29)** expressed some intention to reach persons with disabilities through programmatic work. However, the remaining 27% of MIPs either made no reference to the term « disability »; only made a very general descriptive reference to the inequalities experienced by persons with disabilities; or only referred to disability in the context of policy dialogue as opposed to ODA programming.
* Where MIPs **did** express an intention to reach persons with disabilities, it was not always clear how this intention would be translated into practice. Partly, this is because MIP documents are by their nature top-line: other sources would be needed to get a detailed picture of the EC’s programming plans in particular localities. As a proxy, to get some clues on whether MIPs were backed by more concrete plans for inclusion of persons with disabilities, a review was done on MIPs’ proposed indicators. Indicator frameworks were available for 82 MIPs. Of these, **around 41%** included some sort of plans for monitoring the inclusion of persons with disabilities in at least some of their activities. However, the level of specificity of such plans varied – from concrete indicators explicitly related to disability, to a general intention to gather disability-disaggregated data « where possible ».
* Even where MIPs stated an intention to reach persons with disabilities, in the vast majority of cases there was little evidence that this intention had been mainstreamed right across the MIP. MIPs are built around a series of ‘specific objectives’: only **two** of the 88 MIPs reviewed explicitly mentioned that they intended to integrate considerations of « disability » / persons with « disabilities » across every oneof their programme-related[[29]](#footnote-30) specific objectives.[[30]](#footnote-31)
* Only **around 20%** of MIPs explicitly mentioned plans to support persons with disabilities and/or their representative organisations (DPOs) to speak up for their rights.

Overall, these observations suggest that some steps have been taken to consider persons with disabilities in many MIPs, but that the rights of persons with disabilities are not yet comprehensively integrated.

## Annex 3 : OECD-DAC disability inclusion policy marker data

In 2021 (the most recent year for which data are available, and the first year of the NDICI), just over 50% of the EC’s ODA spending commitments outside the humanitarian sector were reported to have disability inclusion as either a significant or a principal objective (please note this result excludes core contributions to multilateral organisations, due to a lack of data).[[31]](#footnote-32)

This is a substantial increase compared to the previous year (16%),[[32]](#footnote-33) and is a very promising development. However, these results still mean that in 2021, almost half of the spending analysed did **not** aim to include persons with disabilities in any significant way. In other words, there remains significant room for improvement before all EC ODA spending complies with the standard set by CRPD Article 32, that international cooperation should be inclusive of, and accessible to, persons with disabilities.[[33]](#footnote-34)

What is more, marker data in the OECD-DAC database are self-reported, and previous research on the OECD-DAC **gender** marker has found that OECD-DAC members’ reporting is not always reliable.[[34]](#footnote-35) Ideally, similar research would be needed before placing complete reliance on the disability marker scores reported by the EC. It was outside the scope of this analysis to conduct such research.[[35]](#footnote-36) But to get some clues on the kinds of projects being reported as disability-inclusive, we reviewed the descriptive fields[[36]](#footnote-37) in the OECD-DAC database for a sample of projects.

The OECD-DAC’s guidance on the disability policy marker says that, if projects are reported to be disability-inclusive using the policy marker, then this should if possible be supported by a reference to disability inclusion in the descriptive fields in the database. Even if this is not feasible for all projects, the OECD-DAC guidance says it should, as a minimum, be done for projects that are reported to have disability inclusion as their principal objective, or for projects that are very large.[[37]](#footnote-38)

We therefore reviewed a sample comprising 100% of projects for which the EC had reported disability inclusion as the principal objective – a total of 13 projects; and the largest projects for which the EC had reported disability inclusion as a significant objective – a total of 17 projects, each over USD 100 million.[[38]](#footnote-39) We found that :

* Out of the 13 projects that were reported to have disability inclusion as a principal objective, only 6 – **i.e. less than half – included in their project descriptions any language related to any form of disability inclusion**. Even in the case of these six projects, the language was somewhat ambiguous,[[39]](#footnote-40) and the projects appeared to involve many other parallel objectives that were **not** explicitly related to disability inclusion : so it is not obvious from the project description that a score of ‘principal’ on the disability marker was appropriate.
* Out of the 17 very large projects that were reported to have disability inclusion as a significant objective, **only four refer to disability inclusion in their project descriptions** (implicitly, through a reference to inclusive education) ; the remaining 13 do not refer to disability at all.

The fact that these project descriptions do not consistently refer to disability inclusion does not necessarily mean that the projects were not disability inclusive : but it does raise some doubt. Our findings suggest that, until more extensive evidence on the reliability of the EC’s disability marker data is available, the EC’s reported marker results need to be treated with a degree of caution.

1. Acknowledgement : the author of this submission benefitted from information and analysis included in EDF’s [Guidance note on Global Europe funding for DPOs](https://www.edf-feph.org/publications/global-europe-funding-for-dpos-guidance-note/) (Martire / EDF, 2022). [↑](#footnote-ref-2)
2. See for example UN Special Rapporteur on the Rights of Persons with Disabilities, 2020, [Disability-inclusive international cooperation](https://documents-dds-ny.un.org/doc/UNDOC/GEN/N20/188/61/PDF/N2018861.pdf?OpenElement), A/75/186, paragraph 67 on private sector instruments [↑](#footnote-ref-3)
3. [UN CRPD](https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf), Article 32 [↑](#footnote-ref-4)
4. UN, [Transforming our world: the 2030 Agenda for Sustainable Development](https://sdgs.un.org/2030agenda). For a summary of references to disability in the 2030 Agenda, see Lockwood, [“Nothing about us without us”: disability, the SDGs and the UNCRPD](https://www.futurelearn.com/info/courses/global-disability/0/steps/37575) [↑](#footnote-ref-5)
5. World Health Organisation, 2022, [Global report on health equity for persons with disabilities](https://apps.who.int/iris/rest/bitstreams/1481486/retrieve), p.23 [↑](#footnote-ref-6)
6. For example, a 2011 study on 14 countries in the Global South 7 found that in 11 countries there was a significant association between disability and multi-dimensional poverty. (Source : Sophie Mitra, Aleksandra Posarac, and Brandon Vick, 2011, [Disability and Poverty in Developing Countries](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1908128), p.61) [↑](#footnote-ref-7)
7. EC, 2021, [Union of Equality: Strategy for the Rights of Persons with Disabilities](https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8376&furtherPubs=yes), p.23. [↑](#footnote-ref-8)
8. For a summary, see Lipponen / European Commission DG-INTPA, 2023, [Guidance note: leaving no-one behind – disability inclusion in EU external action](https://capacity4dev.europa.eu/library/eu-guidance-note-leaving-noone-behind-disability-inclusion-eu-external-action), section 3.1. (However please note that the documents in this summary cover two related themes : (i) inclusion of persons with disabilities in EC international cooperation programmes, and (ii) diplomatic efforts to encourage implementation of the UN CRPD by the governments of Global South countries. The Latter theme is beyond the scope of the current submission). [↑](#footnote-ref-9)
9. Leenknecht / EDF, 2021, ‘[Success! Persons with disabilities are included in the EU’s new external action budget 2021-27](https://www.edf-feph.org/success-persons-with-disabilities-are-included-in-the-eu-new-external-action-budget-2021-2027/)’ [↑](#footnote-ref-10)
10. [Regulation (EU) 2021/947 of the European Parliament and of The Council of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe, amending and repealing Decision No 466/2014/EU and repealing Regulation (EU) 2017/1601 and Council Regulation (EC, Euratom) No 480/2009](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0947), Article 8, paragraph 2 (emphasis added) [↑](#footnote-ref-11)
11. For more detail, please see Leenknecht / EDF, 2021, ‘[Success! Persons with disabilities are included in the EU’s new external action budget 2021-27](https://www.edf-feph.org/success-persons-with-disabilities-are-included-in-the-eu-new-external-action-budget-2021-2027/)’. [↑](#footnote-ref-12)
12. For EDF’s analysis on the EC’s adoption of the marker, see EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2020: analysis of data from the OECD-DAC disability policy marker](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx). [↑](#footnote-ref-13)
13. European Commission, 2022, [Commission staff working document - Launching the Global Europe Performance Monitoring System containing a Revised Global Europe Results Framework](https://data.consilium.europa.eu/doc/document/ST-5697-2022-INIT/en/pdf), SWD(2022) 22 final, indicator 3.14 on p.23 [↑](#footnote-ref-14)
14. European Commission Directorate-General for International Partnerships (DG-INTPA), 2022, Practice note: making consultations and dialogues inclusive and accessible for all – available from DG-INTPA’s [EU International Partnerships Academy website](https://webgate.ec.europa.eu/intpa-academy/course/index.php?categoryid=52). Lipponen / European Commission DG-INTPA, 2023, [Guidance note: leaving no-one behind – disability inclusion in EU external action](https://capacity4dev.europa.eu/library/eu-guidance-note-leaving-noone-behind-disability-inclusion-eu-external-action). For EDF’s reaction to the guidance note on disability inclusion, see EDF, 2023, ‘[EU guidance note on inclusion of persons with disabilities in EU global actions – joint reaction by EDF and IDDC](https://www.edf-feph.org/publications/eu-guidance-note-on-inclusion-of-persons-with-disabilities-in-eu-global-actions-joint-reaction-by-edf-and-iddc/)’. [↑](#footnote-ref-15)
15. See EDF/International Disability and Development Consortium, 2022, [Input for the List of Issues Prior to Reporting for the second review of the EU by the CRPD Committee](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/DownloadDraft.aspx?key=TmEf2qU3ZBlnXcekZZTWE2Ff8Aqtxsx6S6oi+uiH1USVTnNA977cj5HbWT5W1kbrH0Xll/j6mPeZjwg/1mK4Sg==), p.3 – section on Articles 4.3 and 33.3 [↑](#footnote-ref-16)
16. This submission is not seeking to take a position on any wider questions related to the concept or implementation of Human Rights Dialogues – but rather simply to argue that any such dialogues that take place must meaningfully involve persons with disabilities and their representative organisations, in line with the UN CRPD. [↑](#footnote-ref-17)
17. European Commission, 2020, [Together towards a gender-equal world: EU Gender Action Plan III](https://international-partnerships.ec.europa.eu/system/files/2021-01/join-2020-17-final_en.pdf) [↑](#footnote-ref-18)
18. For more on the need for a disability action plan, see EDF/International Disability and Development Consortium, 2022, [Input for the List of Issues Prior to Reporting for the second review of the EU by the CRPD Committee](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/DownloadDraft.aspx?key=TmEf2qU3ZBlnXcekZZTWE2Ff8Aqtxsx6S6oi+uiH1USVTnNA977cj5HbWT5W1kbrH0Xll/j6mPeZjwg/1mK4Sg==), p.6 – section on Article 32 [↑](#footnote-ref-19)
19. European Commission and their representative organisations, 2022, [Commission staff working document - Launching the Global Europe Performance Monitoring System containing a Revised Global Europe Results Framework](https://data.consilium.europa.eu/doc/document/ST-5697-2022-INIT/en/pdf), SWD(2022) 22 final, indicator 1.11 on p.25. Please note this finding (that disability is only mentioned explicitly in one indicator) is based on analysis of the main Global Europe Results Framework indicators ; it does not include supplementary thematic indicators. [↑](#footnote-ref-20)
20. European Commission, 2022, [Commission staff working document - Launching the Global Europe Performance Monitoring System containing a Revised Global Europe Results Framework](https://data.consilium.europa.eu/doc/document/ST-5697-2022-INIT/en/pdf), SWD(2022) 22 final, p.12. In contrast, the results framework includes two dedicated ‘data quality indicators’ to monitor the availability of gender-disaggregated data (source : Commission staff working document as above, p. 29). [↑](#footnote-ref-21)
21. Bulić Cojocariu / EDF and European Network on Independent Living, 2022, referenced in EDF/International Disability and Development Consortium, 2022, [Input for the List of Issues Prior to Reporting for the second review of the EU by the CRPD Committee](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/DownloadDraft.aspx?key=TmEf2qU3ZBlnXcekZZTWE2Ff8Aqtxsx6S6oi+uiH1USVTnNA977cj5HbWT5W1kbrH0Xll/j6mPeZjwg/1mK4Sg==), section on Article 19, pp.5-6 [↑](#footnote-ref-22)
22. See UN Committee on the Rights of Persons with Disabilities, [General Comment no.7](http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPRiCAqhKb7yhsnbHatvuFkZ%2Bt93Y3D%2Baa2pjFYzWLBu0vA%2BBr7QovZhbuyqzjDN0plweYI46WXrJJ6aB3Mx4y%2FspT%2BQrY5K2mKse5zjo%2BfvBDVu%2B42R9iK1p), CRPD/C/GC/7, paragraph 91 [↑](#footnote-ref-23)
23. See EDF/International Disability and Development Consortium, 2022, [Input for the List of Issues Prior to Reporting for the second review of the EU by the CRPD Committee](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/DownloadDraft.aspx?key=TmEf2qU3ZBlnXcekZZTWE2Ff8Aqtxsx6S6oi+uiH1USVTnNA977cj5HbWT5W1kbrH0Xll/j6mPeZjwg/1mK4Sg==), section on Article 9, pp.4-5 [↑](#footnote-ref-24)
24. CONCORD, inputs to the public consultation on European Commission financing instruments for external action, forthcoming [↑](#footnote-ref-25)
25. Human Rights and Democracy Network – Working Group on funding for human rights and democracy, 2020, Inputs to the programming for the human rights and democracy pillar of the NDICI, paragraphs titled “proactively reaching out to grassroots organisations” and “support to unregistered actors”. [↑](#footnote-ref-26)
26. Only ODA-eligible countries were included in the analysis, so the MIP for the Seychelles was excluded. [↑](#footnote-ref-27)
27. Or “handicap” in the case of French-language documents [↑](#footnote-ref-28)
28. Source of this and other percentages in this section: author’s analysis of EC MIPs, accessed from the EC’s ‘[Global Europe – programming](https://international-partnerships.ec.europa.eu/funding-and-technical-assistance/funding-instruments/global-europe-programming_en)’ website. [↑](#footnote-ref-29)
29. Objectives that appear to relate to policy dialogue, rather than ODA programming, were scoped out of the analysis. Allowance was also made for the fact that some MIPs may include a small number of activities that appeared not to be people-based – for example certain habitat conservation activities. This is a complex area, because even activities that appear not to be people-based can still have important indirect impacts for persons with disabilities, but where this was unclear, such activities were scoped out of the analysis, to give the EC the benefit of the doubt. [↑](#footnote-ref-30)
30. These were Zambia and Mongolia. (And in the case of Mongolia, the result partly reflects that many objectives were scoped out of the analysis altogether, for the reasons explained in the footnote above). In contrast to the MIPs for Zambia and Mongolia, MIPs that made only general statements about the intention to mainstream disability throughout their priorities (without linking this explicitly to objectives), or the intention to gather disability-disaggregated data across all objectives « where possible », were not counted, as this was not considered specific enough to give assurance that disability inclusion would be taken into account consistently. [↑](#footnote-ref-31)
31. Source: author’s analysis of OECD-DAC [Creditor Reporting System](https://stats.oecd.org/Index.aspx?DataSetCode=crs1) data downloaded in June 2023. Analysis uses data in constant 2021 prices, on a commitments basis. Core contributions to multilateral organisations were excluded from the analysis due to a lack of data; administrative costs were also excluded due to lower relevance. Commitments ‘outside the humanitarian sector’ were identified by filtering the ‘Sector2’ field in the database so as to remove ‘emergency response’, ‘reconstruction relief & rehabilitation’, and ‘disaster prevention and preparedness’. The results of the analysis are presented in terms of the **value** of spending, as opposed to the **number** of commitments. [↑](#footnote-ref-32)
32. Source: as above. [↑](#footnote-ref-33)
33. [UN CRPD](https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf), Article 32 [↑](#footnote-ref-34)
34. Grabowski and Essick/Oxfam, 2020, [Are they really gender equality projects? An examination of donors’ gender-mainstreamed and gender equality-focused projects to assess the quality of gender-marked projects](https://oxfamilibrary.openrepository.com/bitstream/handle/10546/620945/rr-are-they-really-gender-equality-projects-donors-050220-en.pdf?sequence=1) [↑](#footnote-ref-35)
35. An attempt to do such research, and some of the problems encountered, is documented in a forthcoming report by CBM Global and allies (see the chapter led by the European Network on Independent Living) [↑](#footnote-ref-36)
36. The database has three descriptive fields where OECD-DAC members can enter free text to describe their projects: “project title”; “short description”; and “long description”. [↑](#footnote-ref-37)
37. OECD-DAC, 2020, [The OECD-DAC policy marker on the inclusion and empowerment of persons with disabilities Handbook for data reporters and users](https://one.oecd.org/document/DCD/DAC/STAT%282020%2948/en/pdf), DCD/DAC/STAT(2020)48, p.15 [↑](#footnote-ref-38)
38. Projects were identified through review of OECD-DAC Creditor Reporting System data downloaded using the approach described above. [↑](#footnote-ref-39)
39. The projects all relate to a single programme in Lebanon - « EU programme in support of Primary Health care access and immunization for vulnerable population in Lebanon ». The project description mentions initiatives relating to mental health, but further information would be needed to understand how far these were designed to contribute to the inclusion of persons with psychosocial disabilities. [↑](#footnote-ref-40)