

Towards equality: assessing EC funding for disability inclusion worldwide

December 2023

Annual report on data from the OECD-DAC disability policy marker

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# Introduction

### The European Disability Forum

The European Disability Forum (EDF) is an independent Non-Governmental Organisation that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisations of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

### Acknowledgements

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# Executive Summary

The Organisation for Economic Cooperation and Development-Development Assistance Committee’s (OECD-DAC’s) disability policy marker is a tool to monitor how far Official Development Assistance (ODA) aims to be inclusive of persons with disabilities.

This paper is EDF’s second annual report into the European Commission’s (EC’s) use of the marker. The paper considers, first, the latest available[[1]](#footnote-2) data on EC ODA spending from 2021. Second, the paper looks at two high-profile EC initiatives – the EC’s inequality marker, and the Global Gateway – and considers the links between the disability policy marker and these initiatives.

Disability policy marker data is self-reported by OECD-DAC members and must be treated with caution. With this caution in mind, our main findings are:

* **The proportion of applicable[[2]](#footnote-3) EC ODA projects reported as disability-inclusive has increased** from 2% in 2018 to 26% in 2021. It is a good increase.
* However, this means that in 2021, **almost three quarters of applicable EC ODA projects were not reported to be inclusive of persons with disabilities in any significant way**.
* The EC’s new inequality marker – **the I-marker – has the potential to complement the disability policy marker.** It could help draw attention to inequalities related to disabilities and the importance of participation. But these benefits are not guaranteed. If the I-marker is used in a simplistic way, **there is also a risk it could distract attention from the disability policy marker** and from the complex cost barriers that can contribute to disability-based inequalities.
* Some of the key partners involved in implementing the Global Gateway – the EC’s “flagship” strategy for large scale infrastructure investment in the Global South – do not yet use the disability policy marker. This makes it **very hard to get a complete picture of how far Global Gateway programmes aim to be inclusive of persons with disabilities**.

The paper recommends that the European Union (EU):

1. Take further urgent steps to **increase the share of its ODA projects that meet the criteria to be reported as disability-inclusive** using the disability policy marker.
2. Ensure that **representative organisations of persons with disabilities (OPDs) have the opportunity to play a central role in all ODA policymaking, budgeting and programming**.
3. Build on its existing efforts to **ensure that all reported disability policy marker data is of the highest quality**, and make more project documentation is publicly available.
4. **Give the disability policy marker (and the gender equality marker) equal prominence to the I-marker** in all target-setting, monitoring, reporting, communication and accountability processes.

The EC should also update its guidance on the I-marker to mitigate some of the potential risks identified in our analysis– for example, risks that the I-marker may distract attention from group-based inequalities or may encourage over-simplified assessments of the level of economic inequality that persons with disabilities face.

1. Ensure that the **disability marker is applied to all EU ODA, not just ODA channelled through the EC**. In particular, the marker should be used to track all European Investment Bank ODA spending, including spending on the Global Gateway.

In addition, the EU should **encourage all other Member States** involved in the Global Gateway (or other Team Europe Initiatives) **to use the disability marker for their own ODA**.

# Background

## The OECD-DAC disability policy marker

The Organisation for Economic Cooperation and Development-Development Assistance Committee (OECD-DAC) is an international forum of 32 members that provide Official Development Assistance (ODA – sometimes referred to as “aid”). Its European members include:

• the European Union (EU);

• and 21 EU Member States (Austria, Belgium, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Luxembourg, The Netherlands, Poland, Portugal, Slovak Republic, Slovenia, Spain and Sweden).

The OECD-DAC monitors and reports data on ODA spending. In 2018, the OECD-DAC introduced a “disability policy marker” to its data system. The disability policy marker is a tool to monitor how far ODA aims to be inclusive of persons with disabilities.

The marker allows governments in the OECD-DAC to allocate each of their ODA projects a score:

* Score 2 means that inclusion and empowerment of persons with disabilities is the principal objective of the project;
* Score 1 means that inclusion and empowerment of persons with disabilities is a significant objective of the project (but not the main reason why the project is being undertaken);
* Score 0 means that the project does not aim to be disability-inclusive.

Not all ODA projects are scored using the disability policy marker, since **the use of the marker is voluntary**.

More detailed information can be found in [the OECD-DAC’s handbook on the marker](https://one.oecd.org/document/DCD/DAC/STAT%282020%2948/en/pdf).

## Purpose of this paper

In 2022, EDF published its [first annual report on the OECD-DAC disability policy marker](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx). The report looked at the data that the European Commission (EC) reported during the marker’s first three years of operation – 2018, 2019 and 2020.

This new paper has two purposes. First, it updates EDF’s last report with the latest available[[3]](#footnote-4) data from 2021. Second, the paper looks at two recent high-profile EC initiatives – the EC’s inequality marker, and Global Gateway – and considers the links between the disability policy marker and these initiatives.

# Methodology and limitations

The findings in this paper are based on a mix of quantitative and qualitative analysis. The main evidence gathering for the paper took place in early December 2023.

### Quantitative analysis

The quantitative analysis uses ODA spending data from the OECD-DAC Creditor Reporting System database focusing on 2021. It was the latest data available when we conducted the analysis in December 2023. Additional details on the calculation methods are presented in notes throughout the paper.

The analysis in the key findings section focuses on the **number** of ODA projects that have been reported as disability-inclusive. To complement this, analysis of the **value** of ODA projects reported as disability-inclusive is included in Annex 1.

Given the short length of the paper, the analysis concentrates on data from the EC as opposed to other European institutions. However, some brief comments on the European Investment Bank are included in the section on Global Gateway.

The most important limitation in the quantitative analysis is that the analysis relies on self-reported disability policy marker data and it was not possible to do independent checks on data quality. This issue is discussed in detail in the main text.

In addition, some limitations in the disability policy marker's design should be kept in mind. The disability policy marker assesses projects against a brief set of criteria: it does not amount to a full assessment on whether projects are compliant with the UN Convention on the Rights of Persons with Disabilities (CRPD). What is more, the disability policy marker only gives information on intentions, not outcomes.[[4]](#footnote-5)

But despite its limitations, the disability policy marker offers important indications on the extent to which EC ODA aims to be inclusive of persons with disabilities. These findings are discussed in more detail in the following sections.

### Qualitative analysis

The main qualitative method was review of documents on the inequality marker and the Global Gateway. The focus was on official documents from the EC or the Council of the European Union. In addition, an [e-learning course](https://webgate.ec.europa.eu/intpa-academy/mod/page/view.php?id=791#:~:text=E%2DLearning%20on%20the%20Inequality%20Marker&text=The%20I%2DMarker%20is%20a,INTPA%20interventions%20to%20reducing%20inequalities) on the inequality marker was completed, and a recording from a European Parliament event on inequality[[5]](#footnote-6) was reviewed. Selected civil society documents were also reviewed for additional perspectives. Finally, reference was also made to wider literature on policy markers, including the OECD-DAC handbook on the disability policy marker; and civil society analysis on both the disability policy marker and the gender equality marker.

Full references to the sources reviewed are given at relevant points throughout the text.

# Key findings

## The share of EC ODA projects reported as disability-inclusive has increased, but is still low relative to CRPD standards

### Trends from 2018 to 2021

For each of the four years from 2018-2021, we analysed the percentage of applicable[[6]](#footnote-7) EC[[7]](#footnote-8) ODA projects that were reported as disability-inclusive, i.e. given a disability policy marker score of 2 (disability inclusion is the principal objective), or a score of 1 (disability inclusion is a significant objective). **The percentage has steadily increased** during the four-year period from 2018-2021 (Figure 1).

**Figure 1: percentage of applicable EC ODA projects reported as disability-inclusive, 2018-2021**

Note: the analysis is based on data from the Creditor Reporting System database, downloaded in December 2023. The analysis uses data on allocable ODA commitments. The percentages are calculated based on the number of projects given scores of 2 and 1, out of the total.

However, even in 2021, **almost three quarters of applicable EC ODA projects were \*not\* reported to be disability-inclusive in any significant way** (Figure 2). This is in sharp contrast to the standards set in the CRPD, which requires that international cooperation must consistently be inclusive of, and accessible to, persons with disabilities.[[8]](#footnote-9)

**Figure 2: percentage of applicable EC ODA projects reported as disability-inclusive in 2021**

Note: the analysis is based on data from the Creditor Reporting System database, downloaded in December 2023. The analysis uses data on allocable ODA commitments, and the percentages are calculated based on the number of projects given scores of 1 or 2 (“objectives on disability inclusion”) or scores of 0 (“no objectives on disability inclusion”).

Furthermore, the EC reported that only a small share of its ODA projects had disability inclusion as the **principal** objective. **Disability inclusion was reported as the principal objective of just 2% of all applicable EC ODA projects in 2021** (see Figure 4 in Annex 1 below).[[9]](#footnote-10) This is only a marginal increase since we looked at the data for 2020: that year, 1% of the EC’s applicable ODA projects had disability inclusion as their principal objective.[[10]](#footnote-11)

Some more detailed analysis on the disability policy marker data for 2021 is in Annex 1.

### Caution: data quality

OECD-DAC members self-report their scores on policy markers such as the disability policy marker. This means that the quality of the data may vary. Any analysis of the data, including the analysis above, needs to be read with some caution.

It was outside the scope of this paper to look into the quality of the EC’s disability policy marker data. Previous research on the OECD-DAC’s **gender** equality policy marker (which works in a similar way to the disability policy marker) found there was a high risk of OECD-DAC members giving their projects over-generous scores.[[11]](#footnote-12)

Similar research does not yet exist for the OECD-DAC disability policy marker. But there are already some early warning signs, which suggest that there is not always enough information publicly available to justify why projects have been reported as disability-inclusive.[[12]](#footnote-13) For instance, EDF previously reviewed the entries in the OECD-DAC database for:

* projects that the EC had reported to have disability inclusion as their principal objective in 2021, and
* the largest projects reported to have disability inclusion as a significant objective in 2021.

**EDF found that the database text describing these projects did not always refer to disability**. This is in contrast to the approach recommended in the OECD-DAC’s disability marker guidance.[[13]](#footnote-14) For example, the EC has reported that disability inclusion is the principal objective of four of its projects in the energy and storage sectors. In theory, disability inclusion and accessibility are very relevant considerations in the energy and storage sectors. But in practice, the project descriptions in the OECD-DAC database do not give any evidence that these energy and storage projects were in fact disability-inclusive projects, as they make no mention of disability at all.

In 2023, the EC took a positive step by producing a briefing note on the disability policy marker.[[14]](#footnote-15) Measures like this have the potential to improve the quality of policy marker data, but more research will be necessary to find out how this works in practice. In the meantime, caution is needed.

## The new inequality marker brings opportunities for CRPD-compliant ODA, but also risks

### Introducing the I-marker

In June 2023, the EC’s Directorate-General for International Partnerships (DG-INTPA) officially launched an inequality marker (the I-marker).[[15]](#footnote-16) The I-marker assesses “whether, and to what extent, inequality reduction is an objective of a donor’s intervention and, therefore, how likely it will have an impact on reducing within country inequalities”.[[16]](#footnote-17) The I-marker works in a broadly similar way to the disability policy marker, but there are also some important differences in how it was developed and how it is used (Table 1).

**Table 1: some comparisons between the I-marker and the disability policy marker**

|  |  |  |
| --- | --- | --- |
|  | **I-marker** | **Disability policy marker** |
| **Marker scoring system[[17]](#footnote-18)** | 3-point scale (principal objective/significant objective/not targeted)[[18]](#footnote-19) | 3-point scale (principal objective/significant objective/not targeted) |
| **Marker created by…** | DG-INTPA | OECD-DAC |
| **Marker used by…** | DG-INTPA. Other parts of the EU institutions, EU Member States and other partners are encouraged to use the marker, but it is not yet clear how far they will do so.[[19]](#footnote-20)  | Used by 21 OECD-DAC members (including all DGs within the EC)[[20]](#footnote-21) |

Source: author’s analysis. Please note the table does not seek to be exhaustive.

As Table 1 shows, the I-marker is not yet used widely outside DG-INTPA. But within DG-INTPA’s work, the I-marker is rapidly becoming a high-profile tool. For example, Commissioner Urpilainen has said that she hopes the I-marker will be used as part of the mid-term review of the EC’s Neighbourhood, Development and International Cooperation Instrument (NDICI – a key financing instrument of the EU’s external action).[[21]](#footnote-22) In some of its recent conclusions, the Foreign Affairs Council said that:

“The Council underlines that monitoring and reporting on inequalities is essential. In this respect the Council welcomes the European Commission’s Inequality Marker (I-Marker) and the use of Distributional Impact Assessments. The Council also recommends the broadest application of the Inequality Marker.”[[22]](#footnote-23)

### Does the I-marker include inequalities based on disability?

The answer to this question is complex: yes and no.

The I-marker “focuses on the bottom (poorest) 40 per cent of the income/wealth distribution (or other socio-economic parameters) or socio-economically disadvantaged individuals, households or groups.”[[23]](#footnote-24) This very broad approach could potentially be interpreted in different ways.

In principle, the I-marker is designed to help capture the intersection between inequalities affecting individuals (or households) and inequalities affecting groups.[[24]](#footnote-25) So in theory, the answer is yes: the I-marker could sometimes include inequalities based on disability, alongside other forms of group-based inequalities.

At the same time, it is not guaranteed that the I-marker would always include disability-based inequalities. In places, the I-marker guidance focuses on economic inequalities affecting the “bottom 40%” of individuals/households. For example, one of the key approaches in the guidance – Distributional Impact Assessment based on an ’Equity Tool’ – looks mainly at wealth-based inequalities at individual/household level.[[25]](#footnote-26) It is true that the Equity Tool can be expanded to include group-based inequalities,[[26]](#footnote-27) however, this is an optional add-on. Against this background, staff applying the I-marker may decide to focus solely on economic inequalities affecting individuals/households. Please see more discussion on this challenge in the risks section below.

### The I-marker and disability: opportunities

The I-marker has the potential to encourage some actions that could be beneficial for promoting the rights of persons with disabilities – particularly those persons with disabilities who experience severe socio-economic disadvantages. There are two main opportunities.

#### An extra incentive

First, under the right circumstances, the I-marker could create an extra incentive to make DG-INTPA’s projects and programmes inclusive of persons with disabilities. As described above, the I-marker has a broad scope. Depending on how different teams within DG-INTPA decide to interpret the I-marker, they might consider how their projects seek to tackle severe socio-economic disadvantages affecting specific groups, and within this, disadvantages based on disability. This could reinforce the existing incentives created by the disability policy marker.

#### A focus on participation

Second, the I-marker reinforces DG-INTPA’s overall guidance for mainstreaming inequality reduction. A key principle of this guidance is that programmes should take a “beneficiary approach” – i.e. they should include the “most vulnerable” throughout all steps of the programming cycle.[[27]](#footnote-28) The guidance emphasises that the voices of people from “marginalised and excluded communities” should be heard at all stages.[[28]](#footnote-29)

In principle, this approach – which is repeated in the I-marker guidance – has the potential to create a strong culture of participation by different groups, including OPDs. However, caution is also needed: the guidance does not explicitly mention persons with disabilities in this context. If persons with disabilities are left out while other groups are included, this could have the perverse effect of **reinforcing** inequalities.

### The I-marker and disability: risks

Despite the potential opportunities described above, the I-marker also poses risks for persons with disabilities, in at least two ways.

#### A distraction from the disability policy marker

The first risk comes from the fact that the scope of the I-marker is open to interpretation. Although in theory the marker can cover inequalities affecting groups as well as inequalities affecting individuals/households, there is a risk that in practice teams will opt for a simpler approach and will focus just on the bottom 40% of individuals or households in the income or wealth distribution. This is a particular risk since the I-marker relies largely on quantitative data,[[29]](#footnote-30) and in many contexts quantitative data on group-based inequalities, such as inequalities facing persons with disabilities, is non-existent or incomplete.[[30]](#footnote-31)

This in turn risks creating confusion among users of I-marker data. On the surface, the I-marker seems to consider group-based inequalities. Data users may assume that the I-marker covers disability- (and gender-) based inequalities, even when this is not how the marker is put into practice. It is true that the I-marker guidance says the I-marker should be used as a complement to, not a replacement for, the disability policy marker and the gender equality policy marker.[[31]](#footnote-32) But there is a risk that this message, deep in the I-marker guidance, will get missed. If this happens, and the I-marker distracts data users from the disability policy marker, this may weaken the disability policy marker’s impact as a tool to drive more disability-inclusive programming.

#### Excluding some persons with disabilities

A second risk relates to the way in which the “poorest 40%” of people are identified. This risk comes from the fact that persons with disabilities typically face significant extra costs. These costs vary widely depending on the context, but examples include: costs of assistive devices, costs of personal assistance, costs of accessible transport and costs of accessible housing. Because of these extra costs, a person with disabilities generally needs more income and/or wealth to enjoy the same standard of living as a person without disabilities.[[32]](#footnote-33)

If the “poorest 40%” of people are identified based solely on their total income and/or wealth, the impact of disability-related costs will not be considered. For example, a person with disability may have just enough total income that they do not count as one of the poorest 40%. But by the time they have covered the extra costs needed to overcome the various barriers they face, their remaining income may be much lower than the income of some other people in the “poorest 40%”. The I-marker guidance does not mention this complexity. If the I-marker encourages projects to target the “poorest 40%” without allowing for the extra costs of disability, persons with disabilities who live in poverty may be excluded, and the inequalities they face may be exacerbated.

## More data is needed on the inclusion of persons with disabilities in Global Gateway ODA spending

### Global Gateway

Please note: for the purposes of this paper, we only looked at Global Gateway’s use of the disability policy marker. We did not have scope to examine any wider questions about whether Global Gateway is contributing to the enjoyment of rights by persons with disabilities. However, this would be an important area to research in the future.

Global Gateway is an EC strategy for large scale investment in infrastructure in the Global South, launched in 2021. It focuses on investments in five sectors: digital; climate and energy; transport; health; and education and research.[[33]](#footnote-34)

Global Gateway aims to ‘mobilise’ up to EUR 300 billion in investments between 2021 and 2027. The finance is expected to come from existing EU budget resources (including the Neighbourhood, Development and International Cooperation Instrument), as well as from EU Member States and from private sector investors.[[34]](#footnote-35)

Global Gateway is a very high-profile initiative, perceived as a “flagship.”[[35]](#footnote-36)

### Use of the disability policy marker for reporting on Global Gateway

In 2023, both Commissioner Urpilainen and the Foreign Affairs Council have said they hope the I-marker will be widely used to report on Global Gateway projects.[[36]](#footnote-37) We looked to see if we could find any similar statements on the disability policy marker, but we could not.[[37]](#footnote-38)

The EC uses the disability policy marker to report on all its ODA spending,[[38]](#footnote-39) including spending as part of Global Gateway. But the EC is just one of many partners involved in Global Gateway. Many others have a much less consistent track record of using the disability policy marker. For example:

* The European Investment Bank is a major partner in financing Global Gateway.[[39]](#footnote-40) But the European Investment Bank has not yet started using the disability policy marker (Figure 3).[[40]](#footnote-41)
* Global Gateway is being implemented under a ‘Team Europe’ approach with inputs from different Member States.[[41]](#footnote-42) But EU Member States are inconsistent in their use of the disability policy marker (see Annex 2 for more details).

Given the gaps in some implementing partners’ disability policy marker reporting, it will be very hard to get a complete picture of how far Global Gateway programmes aim to be inclusive of persons with disabilities.

**Figure 3: use of the disability policy marker in 2021, by the European Commission and the European Investment Bank**

Note: the analysis is based on data from the Creditor Reporting System database, downloaded in December 2023. The analysis uses data on allocable ODA commitments.

# Recommendations

Our [first annual report](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), in 2022, on the OECD-DAC disability policy marker made detailed recommendations for how the EC, the OECD-DAC, UN entities and other multilateral bodies could make the most of the disability policy marker. These recommendations are all still relevant and more urgent than ever. They are reproduced in Annex 3 for reference.

In addition, based on this year’s analysis, we add the following new or updated recommendations to the EU:

1. Take further urgent steps to **increase the share of ODA projects that meet the criteria to be reported as disability-inclusive** using the disability policy marker.Drawing on the detailed findings in Annex 1, we also reiterate our call for the EC to:

* 1. Rapidly review whether there is a need to increase the proportion of projects that have disability inclusion as their **principal** **objective**.
	2. Ensure that all projects with objectives on gender equality pay attention to the **intersection between gender and disability**.

2. Ensure that **representative OPDs can play a central role in all ODA policymaking, budgeting and programming**, building on the “beneficiary approach” set out in the guidance on mainstreaming inequality reduction.

3. Build on its existing efforts to **ensure that all reported disability policy marker data is of the highest quality**, for example through further training and through additional quality checks on marker scores. The EC should also ensure that key project documents are publicly available (for example, through the International Aid Transparency Initiative database). This can help outside stakeholders, including OPDs, to make more informed judgements on the quality of the EC’s disability policy marker reporting.

4. **Give the disability policy marker (and the gender equality marker) equal prominence to the I-marker** in all target-setting, monitoring, reporting, communication and accountability processes. The EC should also:

1. Update the I-marker guidance to make it more obvious (including on the first page) that the I-marker is **not a substitute for the disability policy marker**.
2. Revise the I-marker guidance to allow a **wider range of evidence types** to be considered for analysis and monitoring purposes, where quantitative data on groups experiencing inequalities is incomplete. For example, qualitative evidence from rightsholders or their representative organisations should also be considered.
	1. Explore how to improve the inclusion of other **intersecting forms of group-based inequalities** in its expenditure tracking processes. The I-marker alone cannot do justice to these other forms of group-based inequalities, no more than it can be a substitute for the disability policy marker.
	2. Explore how to allow for the **extra costs of disability** in its tools for analysing economic inequalities.

5. Ensure that the **disability marker is applied to all EU ODA, not just ODA channelled through the EC**. In particular, the marker should be used to track all EIB ODA spending, including spending on the Global Gateway.

In addition, the EU should **encourage all other Member States** involved in the Global Gateway (or other Team Europe Initiatives) **to use the disability marker for their own ODA**.

# Annexes

## Annex 1: more detailed analysis of the EC’s disability policy marker data from 2021

### Projects with disability inclusion as the principal objective

In 2021, the total number of EC ODA projects covered by our analysis was 853.[[42]](#footnote-43) Of these, 224 projects (26% of projects) were reported as disability-inclusive, as shown in Figure 2 above. This breaks down into:

* + 13 projects that had disability inclusion as their principal objective (marker score 2).
	+ 211 projects had disability inclusion as a significant objective, but not the main reason for undertaking the project (marker score 1).[[43]](#footnote-44)

This means that in percentage terms, **only 2% of the EC’s applicable[[44]](#footnote-45) ODA projects in 2021 had disability inclusion as their principal objective** (Figure 4). This is only a marginal increase since we looked at the data for 2020: that year, 1% of the EC’s applicable ODA projects had disability inclusion as their principal objective.[[45]](#footnote-46)

**Figure 4: percentage of applicable EC ODA projects reported as disability-inclusive in 2021, disaggregated by marker score**

Note: the analysis is based on data from the Creditor Reporting System database, downloaded in December 2023. The analysis uses data on allocable ODA commitments, and the percentages are calculated based on the number of projects given scores of 2 (“principal objective”), 1 (“significant objective”) or 0 (“no objectives on disability inclusion”). Percentages do not sum to 100 due to rounding.

As we wrote in our report last year, “Projects scored 2 are not necessarily more important than projects scored 1: in principle, both can be equally impactful.[[46]](#footnote-47) Indeed, any OECD-DAC member that has successfully mainstreamed the rights of persons with disabilities across its work should have many projects with a score of 1.

However, if the number of projects scored 2 is very low, this may be a warning sign that an OECD-DAC member is not paying sufficient attention to the specific measures needed to break down barriers that persons with disabilities face.”[[47]](#footnote-48)

### Overlap between gender equality and disability inclusion

As well as its policy marker on disability inclusion, the OECD-DAC also has a policy marker on gender equality. Analysing the two markers together can give insights on how OECD-DAC members are approaching the intersection between disability and gender.

Out of the total 853 EC ODA projects covered by our analysis for 2021, 633 were reported to have objectives on gender equality (either as the principal objective, or as a significant objective). **Of these 633 projects with objectives on gender equality, only around 35% also had objectives on disability inclusion**.[[48]](#footnote-49)

This is an increase relative to 2020, when the corresponding percentage was 22%.[[49]](#footnote-50) However even in 2021, almost two thirds of the EC’s reported gender equality projects still did not aim to be inclusive of women with disabilities in any significant way.

### Value of ODA reported as disability-inclusive

The analysis in the main body of this paper looks at the **number of applicable[[50]](#footnote-51) projects** reported as disability-inclusive by the EC. In contrast, the analysis in this sub-section instead focuses on the **value of applicable spending** reported as disability-inclusive.

In 2021, our analysis covered 16.5 billion USD (around 13.8 billion EUR) of EC ODA spending. Out of this total, 7.3 billion USD (around 6.2 billion EUR) was reported to be disability-inclusive.[[51]](#footnote-52) In percentage terms, this means around 44% of applicable EC ODA spending was reported to be disability-inclusive in 2021.

This contrasts with the analysis based on the number of projects in the main body of the paper, which found that 26% of projects were reported as disability-inclusive. The difference in the two percentages results from a few very high-value projects that were reported to be disability-inclusive. In fact, out of the 7.3 billion USD reported as disability-inclusive, 3.1 billion USD relates to just six very large projects.[[52]](#footnote-53)

If the EC is taking measures to ensure that large ODA projects are disability-inclusive, this is a positive step. However, EDF’s previous analysis on these same large projects found that the text in the OECD-DAC database describing the projects does not make any reference to disability. This is in contrast to the approach recommended in the OECD-DAC’s disability marker guidance.[[53]](#footnote-54) The fact that the text describing the projects does not refer to disability does not necessarily mean that the projects were not disability-inclusive : but it does raise some doubt. This suggests that the 44% figure should be treated with a degree of caution.

Moreover, as we argued last year, although it is positive for large projects to be disability-inclusive, this is not enough. “We can only start to take assurance that the EC has integrated the rights of persons with disabilities systematically into its project planning processes when **all** projects - large or small - have objectives on disability inclusion.”[[54]](#footnote-55)

## Annex 2: use of the disability policy marker by different EU Member States

Figure 5 below analyses how far different EU Member States made use of the disability policy marker to report on their ODA projects in 2021. For each Member State, it shows the percentage of applicable[[55]](#footnote-56) ODA projects for which the disability policy marker was used (Please note that for this analysis, “using” the disability policy marker means using the marker to give any score – even a score of zero. In contrast if the Member State has simply left the disability policy marker blank when it reported its ODA data, then it is “not using” the marker).

**Figure 5: disability policy marker use by EU Member States in 2021**

Note: the analysis is based on data from the Creditor Reporting System database, downloaded in December 2023. The analysis uses data on allocable ODA commitments. “Marker used” means a score of 2, 1 **or 0** was given. “Marker not used” means that the disability policy marker section of the database was left blank. The bar for the EU includes all EU institutions with ODA projects, not only the EC. Lithuania and Estonia are not included in the analysis because in 2021 they were not yet members of the OECD-DAC.

## Annex 3: recommendations made in EDF’s 2022 annual report on the disability policy marker

This annex contains recommendations from EDF’s [first annual report](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx) on the OECD-DAC disability policy marker, published in 2022. One year on, these recommendations remain relevant and urgent.[[56]](#footnote-57)

### OECD-DAC members should:

* Follow the EC’s example of **applying the disability policy marker to 100% of their ODA projects**.

### UN entities and other multilateral bodies should:

* **Report publicly on how far their spending aims to be inclusive of persons with disabilities**, including through the OECD-DAC Creditor Reporting System (CRS) database.

### The EC and other OECD-DAC members collectively should:

* **Call for the OECD-DAC to strengthen the design and implementation of the disability policy marker**, including by:
	1. Making the marker mandatory, rather than voluntary;
	2. Refining the scoring criteria so that they align fully with the UN Convention on the Rights of Persons with Disabilities (in particular by requiring participation of DPOs/OPDs);
	3. Aligning the scoring criteria more closely with the OECD-DAC gender marker; and
	4. Introducing a purpose code to track funding to DPOs/OPDs (similar to the existing code for funding to women’s equality organisations and institutions[[57]](#footnote-58))
	5. Introducing a centralised quality assurance and learning process to enhance comparability of different OECD-DAC members’ reporting. The process could be sample based to allow for resource limitations.
* The EC should work with the OECD-DAC to introduce additional Agency Codes in the CRS database corresponding to the EC’s different Directorates-General, to allow more detailed comparisons and accountability.

# Document credits

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1. I.e. the latest available data in early December 2023, when the analysis was done. [↑](#footnote-ref-2)
2. When the OECD-DAC does analysis on policy marker data, it only applies its analysis to some sorts of ODA spending. These spending types are known as “allocable” ODA. More details are available on p.19 of the [OECD-DAC handbook on the disability policy marker](https://one.oecd.org/document/DCD/DAC/STAT%282020%2948/en/pdf). Examples of spending types that are **not** included in “allocable” ODA are core funding for multilateral agencies, and general budget support. [↑](#footnote-ref-3)
3. The latest available data when the analysis was done, in early December 2023 [↑](#footnote-ref-4)
4. For more discussion on the limitations of the disability policy marker, see Meeks/Atlas Alliance, 2023, [Tracking disability-inclusive development: making the most of the OECD-DAC disability inclusion policy marker to promote equality and inclusion in international development and humanitarian assistance](https://uploads-ssl.webflow.com/60fea532c3e33e5c5701d99a/6450f0a913cabf92e26b88d9_Report%20OECD-DAC%20FINAL.docx), pp.15,19-25. [↑](#footnote-ref-5)
5. European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023) [↑](#footnote-ref-6)
6. When the OECD-DAC does analysis on policy marker data, it only applies its analysis to some sorts of ODA spending. These spending types are known as “allocable” ODA. More details are available on p.19 of the [OECD-DAC handbook on the disability policy marker](https://one.oecd.org/document/DCD/DAC/STAT%282020%2948/en/pdf). Examples of spending types that are **not** included in “allocable” ODA are core funding for multilateral agencies, and general budget support. [↑](#footnote-ref-7)
7. Throughout the text, references to the EC refer to all EC Directorates-General collectively. [↑](#footnote-ref-8)
8. [UN Convention on the Rights of Persons with Disabilities](https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf), e.g. Article 32 [↑](#footnote-ref-9)
9. Based on analysis of Creditor Reporting System data, downloaded in December 2023. The analysis uses data on allocable ODA commitments. [↑](#footnote-ref-10)
10. See EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), pp.9-10. Additional analysis to calculate percentages undertaken was using Creditor Reporting System data (covering allocable ODA commitments) downloaded in December 2023. [↑](#footnote-ref-11)
11. 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-12)
12. For some early findings on the **EC**, see the chapter by Angelova-Mladenova (European Network on Independent Living) and Meeks, in CBM Global and allies’ forthcoming report on the disability policy marker. See also European Disability Forum (EDF) submission to the public consultation: European Commission financing instruments for external action, pp.8-9 (available from the European Commission’s compilation of submissions annexed to the consultation questionnaire, on the [consultation webpage](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13544-Financing-for-European-action-outside-EU-borders-evaluation-of-the-instruments-2014-2020-2021-2027-/public-consultation_en)). For findings on the reliability of disability policy marker reporting across a range of other countries, see: Watkins, Christopolos and others/NIDAS, 2022, [Evaluation of persons with disabilities in development cooperation](https://www.norad.no/globalassets/publikasjoner/publikasjoner-2022/evalueringer/report-5-2022.-evaluation-of-norways-inclusion-of-persons-with-disabilities-in-development-cooperation.pdf), p.22 (covering **Norway**); Hagen Herskind (Disabled People’s Organisations Denmark, in CBM Global and allies’ forthcoming report on the disability policy marker (covering **Denmark**)); Meeks/Atlas Alliance, 2023, [Tracking disability-inclusive development: making the most of the OECD-DAC disability inclusion policy marker to promote equality and inclusion in international development and humanitarian assistance](https://uploads-ssl.webflow.com/60fea532c3e33e5c5701d99a/6450f0a913cabf92e26b88d9_Report%20OECD-DAC%20FINAL.docx), pp.16-18 (covering **multiple OECD-DAC members**); and Development Initiatives, 2020, [Disability-inclusive ODA: Aid data on donors, channels, recipients](https://devinit.org/documents/755/Disability-inclusive-ODA_IF.pdf), section titled ‘Findings from the DAC marker’ (covering **multiple OECD-DAC members**). [↑](#footnote-ref-13)
13. European Disability Forum (EDF) submission to the public consultation: European Commission financing instruments for external action, pp.8-9 (available from the European Commission’s compilation of submissions annexed to the consultation questionnaire, on the [consultation webpage](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13544-Financing-for-European-action-outside-EU-borders-evaluation-of-the-instruments-2014-2020-2021-2027-/public-consultation_en)). Cross-checked to a download of data from the Creditor Reporting System database (downloaded in December 2023, looking at ODA commitments) for further detail on the examples relating to energy and storage. [↑](#footnote-ref-14)
14. Lipponen/European Commission, 2023, [Guidance note : leaving no-one behind – disability inclusion in EU external action](https://capacity4dev.europa.eu/media/131345/download/c69c327a-5719-4ae9-984b-8f1793b8604a_en), Annex 3, pp. 39-43. Please note it was beyond the scope of this paper to form a judgement on the details of this guidance. [↑](#footnote-ref-15)
15. Cournut, 2023, [EC launched the inequality marker!](https://capacity4dev.europa.eu/discussions/ec-launched-inequality-marker-0_en) [↑](#footnote-ref-16)
16. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.4 [↑](#footnote-ref-17)
17. Although the two markers follow the same overall scoring system, there are some differences in the details. The I-marker uses a four-part set of criteria to guide scoring (the criteria cover analysis; objectives/activities; indicators; and evaluation). This is arguably more ambitious than the scoring guidance for the disability inclusion marker, which does not explicitly include all these elements. (For more discussion on gaps in the disability marker scoring system, see Meeks/Atlas Alliance, 2023, [Tracking disability-inclusive development: making the most of the OECD-DAC disability inclusion policy marker to promote equality and inclusion in international development and humanitarian assistance](https://uploads-ssl.webflow.com/60fea532c3e33e5c5701d99a/6450f0a913cabf92e26b88d9_Report%20OECD-DAC%20FINAL.docx), pp.19-24). [↑](#footnote-ref-18)
18. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.10 [↑](#footnote-ref-19)
19. See e.g. Urpilainen, comments during European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023); and Council of the European Union, Foreign Affairs Council, 15732/23, Council Conclusions on ‘[A social, green and digital transition](https://data.consilium.europa.eu/doc/document/ST-15732-2023-INIT/en/pdf)’, paragraph 9 [↑](#footnote-ref-20)
20. Source: analysis of OECD-DAC Creditor Reporting System commitments data for 2021. Data downloaded in December 2023. Analysis excludes Estonia and Lithuania as they joined the OECD-DAC after 2021. [↑](#footnote-ref-21)
21. Urpilainen, comments during European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023) [↑](#footnote-ref-22)
22. Council of the European Union, Foreign Affairs Council, 15732/23, Council Conclusions on ‘[A social, green and digital transition](https://data.consilium.europa.eu/doc/document/ST-15732-2023-INIT/en/pdf)’, paragraph 9 [↑](#footnote-ref-23)
23. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.8 [↑](#footnote-ref-24)
24. Morabito, comments during European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023) [↑](#footnote-ref-25)
25. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.17 [↑](#footnote-ref-26)
26. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), pp.18,20 [↑](#footnote-ref-27)
27. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.6; pp. Negre and others/European Commission, 2021, [Addressing income inequalities through development cooperation, Volume 3: guidelines for mainstreaming the reduction of inequality in interventions](https://op.europa.eu/en/publication-detail/-/publication/f7afdb18-20d6-11ec-bd8e-01aa75ed71a1), Tools and methods series: reference document no.29, section on “A beneficiary approach” on pp. 9-10 [↑](#footnote-ref-28)
28. Negre and others/European Commission, 2021, [Addressing income inequalities through development cooperation, Volume 3: guidelines for mainstreaming the reduction of inequality in interventions](https://op.europa.eu/en/publication-detail/-/publication/f7afdb18-20d6-11ec-bd8e-01aa75ed71a1), Tools and methods series: reference document no.29, p.9 [↑](#footnote-ref-29)
29. See for example Morabito, comments during European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023) [↑](#footnote-ref-30)
30. This point was also raised by Putaturo (Oxfam) during the European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023) [↑](#footnote-ref-31)
31. Morabito and Niño-Zarazúa/European Commission, 2023, [The European Commission inequality marker: guidelines for the application and scoring of interventions](https://op.europa.eu/en/publication-detail/-/publication/2faa22b4-a8fb-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-280515442), p.14. See also pp.6-7 on the gender equality policy marker. [↑](#footnote-ref-32)
32. Mont, 2023, Estimating the extra disability expenditures for the design of inclusive social protection policies, ‘Introduction’, in *Frontiers in Rehabilitation Sciences* (Front. Rehabil. Sci. 4:1179213), doi: 10.3389/fresc.2023.1179213. [↑](#footnote-ref-33)
33. European Commission High Representative of the Union for Foreign Affairs and Security Policy, JOIN(2021) 30 final, [Joint Communication to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank: The Global Gateway](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021JC0030), pp.1,2,4,5,6,7,8 [↑](#footnote-ref-34)
34. European Commission High Representative of the Union for Foreign Affairs and Security Policy, JOIN(2021) 30 final, [Joint Communication to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank: The Global Gateway](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021JC0030), pp.2,8,9. See also Sial and Sol / Eurodad and Counter Balance, 2022, [The emperor’s new clothes: what’s new about the EU’s Global Gateway?](https://assets.nationbuilder.com/eurodad/pages/3034/attachments/original/1663057226/EU-global-gateway-report-FINAL.pdf?1663057226), p.10. (Note: the European Fund for Sustainable Development-Plus, mentioned in these documents, is part of the Neighbourhood, Development and International Cooperation Instrument). [↑](#footnote-ref-35)
35. Meredith and Chen/ODI, 2023, [Five takeaways from the Global Gateway Forum](https://odi.org/en/insights/five-takeaways-from-the-global-gateway-forum/). See also e.g. Council of the European Union, Foreign Affairs Council, 15732/23, Council Conclusions on ‘[A social, green and digital transition](https://data.consilium.europa.eu/doc/document/ST-15732-2023-INIT/en/pdf)’, paragraph 14(c) and Council of the European Union, Foreign Affairs Council, 15684/23, Council Conclusions on ‘[the Team Europe approach](https://data.consilium.europa.eu/doc/document/ST-15684-2023-INIT/en/pdf)’, paragraphs 3,4,6. [↑](#footnote-ref-36)
36. See e.g. Urpilainen, comments during European Parliament event on ‘[Tackling inequalities: paving the way for a sustainable future](https://www.socialistsanddemocrats.eu/events/tackling-inequality-paving-way-sustainable-future)’ (event organised by S&D Group in October 2023); and Council of the European Union, Foreign Affairs Council, 15732/23, Council Conclusions on ‘[A social, green and digital transition](https://data.consilium.europa.eu/doc/document/ST-15732-2023-INIT/en/pdf)’, paragraph 9. [↑](#footnote-ref-37)
37. Sources checked included: European Commission High Representative of the Union for Foreign Affairs and Security Policy, JOIN(2021) 30 final, [Joint Communication to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank: The Global Gateway](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021JC0030); European Commission, 2021, [Questions and answers on Global Gateway](https://commission.europa.eu/document/download/fa74658e-7c35-4df3-ae21-63bcfa122b07_en); European Commission, 2023, [Global Gateway 2023 Flagship projects – infographics](https://international-partnerships.ec.europa.eu/publications/global-gateway-2023-flagship-projects-infographics_en); European Commission, [EU-Africa: Global Gateway Investment Package](https://international-partnerships.ec.europa.eu/policies/global-gateway/initiatives-region/initiatives-sub-saharan-africa/eu-africa-global-gateway-investment-package_en); Council of the European Union, Foreign Affairs Council, 15732/23, Council Conclusions on ‘[A social, green and digital transition](https://data.consilium.europa.eu/doc/document/ST-15732-2023-INIT/en/pdf)’; as well as Lipponen/European Commission, 2023, [Guidance note : leaving no-one behind – disability inclusion in EU external action](https://capacity4dev.europa.eu/media/131345/download/c69c327a-5719-4ae9-984b-8f1793b8604a_en). [↑](#footnote-ref-38)
38. Source: author’s analysis of Creditor Reporting System database. [↑](#footnote-ref-39)
39. European Commission, 2021, [Questions and answers on Global Gateway](https://commission.europa.eu/document/download/fa74658e-7c35-4df3-ae21-63bcfa122b07_en), p.4 [↑](#footnote-ref-40)
40. Strictly speaking, it is possible that some of the financial contribution from the European Investment Bank would not count as ODA but as Other Official Flows (OOF). But even if this is the case, it would still be important to pay attention to the inclusion of persons with disabilities, and the European Investment Bank could still use the disability policy marker when reporting its OOF data to the OECD-DAC. [↑](#footnote-ref-41)
41. European Commission High Representative of the Union for Foreign Affairs and Security Policy, JOIN(2021) 30 final, [Joint Communication to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank: The Global Gateway](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021JC0030), pp.2,12,13 [↑](#footnote-ref-42)
42. Our analysis covered “allocable” ODA projects only. We took this approach to match the approach taken by the OECD-DAC, which only applies its policy marker analysis to allocable ODA. More details are available on p.19 of the [OECD-DAC handbook on the disability policy marker](https://one.oecd.org/document/DCD/DAC/STAT%282020%2948/en/pdf). Examples of spending types that are **not** included in “allocable” ODA are core funding for multilateral agencies, and general budget support. [↑](#footnote-ref-43)
43. Based on analysis of Creditor Reporting System data, downloaded in December 2023. The analysis uses data on allocable ODA commitments. [↑](#footnote-ref-44)
44. I.e. allocable ODA projects [↑](#footnote-ref-45)
45. See EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), pp.9-10. Additional analysis to calculate percentages undertaken was using Creditor Reporting System data (covering allocable ODA commitments) downloaded in December 2023. [↑](#footnote-ref-46)
46. 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), p.14 [↑](#footnote-ref-47)
47. EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), pp.9-10 [↑](#footnote-ref-48)
48. Based on analysis of data from the Creditor Reporting System database, downloaded in December 2023. The analysis used data on allocable ODA commitments. [↑](#footnote-ref-49)
49. EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), p.10 [↑](#footnote-ref-50)
50. I.e. treating only allocable spending as applicable [↑](#footnote-ref-51)
51. Based on analysis of data from the Creditor Reporting System database, downloaded in December 2023. The analysis used data on allocable ODA commitments in 2021 prices. The conversion from USD to EUR was calculated using [IMF exchange rate data](https://www.imf.org/external/np/fin/data/param_rms_mth.aspx) for 30 June 2021. Projects were treated as “disability-inclusive” if they were given a disability policy marker score of 1 or 2. [↑](#footnote-ref-52)
52. Analysis of data from the Creditor Reporting System database, downloaded in December 2023. The analysis used data on allocable ODA commitments. [↑](#footnote-ref-53)
53. European Disability Forum (EDF) submission to the public consultation: European Commission financing instruments for external action, pp.8-9 (available from the European Commission’s compilation of submissions annexed to the consultation questionnaire, on the [consultation webpage](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13544-Financing-for-European-action-outside-EU-borders-evaluation-of-the-instruments-2014-2020-2021-2027-/public-consultation_en)). Cross-checked to a download of data from the Creditor Reporting System database (downloaded in December 2023, looking at allocable ODA commitments in 2021 prices) to confirm the finding for the largest six projects specifically. [↑](#footnote-ref-54)
54. EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), p.15 [↑](#footnote-ref-55)
55. I.e. treating allocable projects as applicable [↑](#footnote-ref-56)
56. EDF, 2022, [Annual report – EC spending on disability inclusion in global actions 2018-2022](https://www.edf-feph.org/content/uploads/2022/11/EDF-EC-ODA-marker-2022.docx), pp.12-13. Please note this version of the list of recommendations from last year’s annual report has been edited to avoid repetition, since some of the recommendations overlap with those already included in the main recommendations section above. [↑](#footnote-ref-57)
57. See OECD-DAC, 2016, [Handbook on the OECD-DAC gender equality marker](https://www.oecd.org/dac/gender-development/Handbook-OECD-DAC-Gender-Equality-Policy-Marker.pdf), p.7 [↑](#footnote-ref-58)