



# **Input by EDF and IDDC for the consultation on the review of the European Strategy for the Rights of Persons with Disabilities 2021-2030**

Focus on Chapter 6 on Promoting the Rights of Persons with Disabilities globally

## **Introduction**

The European Union's Strategy for the Rights of Persons with Disabilities 2021-2030 (or EU Disability Rights Strategy) sets out an ambitious framework to advance the rights of persons with disabilities within the EU and globally. As the Strategy enters its second phase of implementation towards 2030, this joint paper with a specific focus on EU external action is submitted by the European Disability Forum (EDF) and the International Disability and Development Consortium (IDDC) as an input to the European Commission's consultation on the implementation of the Strategy.

In a context marked by intersecting crises globally – including the climate crisis, armed conflicts, humanitarian emergencies, forced displacement as well as shrinking civil society space and massive cuts to development and humanitarian aid budgets – effective implementation of Chapter 6 of the Strategy, on promoting the rights of persons with disabilities globally, is more urgent than ever. While the Strategy recognises the importance of disability inclusion in EU external action, progress to date remains uneven, fragmented and insufficiently monitored.

This paper identifies persistent gaps between commitments made under the EU Disability Rights Strategy and their implementation in humanitarian action, climate action, disaster risk reduction and international cooperation. It highlights the limitations of non-binding guidance, the lack of a coherent accountability framework, and the continued absence of a dedicated and binding Disability Action Plan in EU external action.

EDF and IDDC call on the European Commission and EU Member States to use the second half of the EU Disability Rights Strategy (2026–2030) to move from policy commitments to measurable actions. Key recommendations include the adoption and implementation of an EU Disability Action Plan in External Action, the introduction of binding disability inclusion requirements across all EU external funding and policies, strengthened representation and meaningful participation of organisations of persons with disabilities (OPDs) in EU structures and processes, and reinforced monitoring, funding and institutional capacity to ensure delivery of the Strategy's objectives by 2030.

## Purpose and scope

This paper is jointly developed by the EDF and IDDC, building on long-standing engagement with EU institutions and international partners on the implementation of the CRPD in EU external action.

It contributes to the ongoing implementation and review of the EU Disability Rights Strategy 2021–2030, with a specific focus on EU external action. The scope covers humanitarian aid, disaster risk reduction, climate action, migration and refugee policies, and international cooperation and external action.

While important policy guidance and references to the UN Convention on the Rights of Persons with Disabilities (CRPD) have increased since 2021, progress remains uneven, fragmented and largely non-binding. Section 6 of the Strategy (“Promoting the rights of persons with disabilities globally”) lacks a clear implementation roadmap, binding requirements, dedicated resources, and an accountability framework. As a result, disability inclusion in humanitarian action, climate action, disaster risk reduction and international cooperation remains inconsistent and insufficient.

This paper offers suggestions for areas of improvement with a constructive approach, largely building on the 2025 EU’s Concluding Observations by the Committee on the Rights of Persons with Disabilities (CRPD Committee). Our common objective is to make EU external action CRPD compliant, so that the EU effectively contributes to protecting the rights of the most marginalised persons with disabilities in partner countries.

## Background - CRPD Articles related to EU external action

### Situations of risk and humanitarian emergencies (Article 11 CRPD)

The EU, together with its Member States, is one of the largest humanitarian donors with EU humanitarian funding being channelled through the Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) to its humanitarian partners.

In 2019, DG ECHO published a [Guidance Note on the Inclusion of Persons with Disabilities in EU-funded Humanitarian Aid Operations](#). However, the EU Disability Rights Strategy includes no mention of how this Guidance Note is being implemented or monitored, and there is still no clarity on how the EU plans to align its practical humanitarian guidance to the 2019 [IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action](#).

The 2021 version of [DG ECHO partners’ reporting guidelines](#) (the ‘Single Form’) advises ECHO funding partners on prioritising the involvement of persons with disabilities (among other ‘diverse groups’) in project implementation; it ‘encourages’ the use of the [Washington Group Short Set of questions](#) in data disaggregation; and mentions mainstreaming of disability at various steps of the programme cycle. However, none of these are binding requirements for ECHO partners. There is also no reporting indicator for measuring outcomes and success of these actions and no obligation for ECHO partners to ensure that all persons with disabilities in affected populations are reached or even to involve OPDs in planning and monitoring.

Since 2019, ECHO has applied the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) disability inclusion policy marker to track its funding, including for humanitarian action. This is one of the only concrete actions regarding humanitarian action included for monitoring in Chapter 6 of the EU Strategy on the Rights of Persons with Disabilities. However, according to [EDFs Annual report on data from the OECD-DAC disability marker](#), in 2023, the European Commission reported that 63% of its ODA activities were not disability-related in any significant way. EDF estimates that, in the five years from 2019 to 2023, around 49 billion EUR of EC ODA failed to take disability into account in any significant way.

Training for ECHO partners on disability inclusion in humanitarian action is still not routine, whether it is a standalone disability-specific module or integrated into ongoing mainstream training.

The EU has still not properly mainstreamed disability into its migration and refugee policies and disaster risk reduction action plan, and persons with disabilities and their representative organisations are not included in the design, implementation and monitoring of those policies. This is very worrying in light of the increasing number of natural disasters and the movement of populations due to natural, economic and political situations.

Globally humanitarian donors, including some EU Member States, are tending to prioritise their humanitarian aid with a focus on lifesaving while abandoning protection and inclusion approaches. As a major humanitarian actor, the EU has the leverage to influence its peers and protect disability rights.

### **Climate action and disability inclusion in EU external action**

The EU's climate goals and policies do not sufficiently focus on the social aspects of sustainability and Disaster Risk Reduction, both within Europe and in its global work in international cooperation and humanitarian action. Neither mitigation nor adaptation planning takes persons with disabilities sufficiently into account. Going forward, any negotiations on climate finance in respect of those most affected by the climate crisis must take into consideration including the needs of persons with disabilities.

Although the EU Disability Rights Strategy recognises the impact of climate change on persons with disabilities and emphasises the need to ensure that the green transition is fully inclusive, there is no explicit mention of this within the context of EU external action in Section 6 of the European Disability Strategy Section 6. Similarly, the new [EU Strategy on Adapting to Climate Change](#) (2021) highlights the disproportionate impact on persons with disabilities, but it does not address their participation through representative organisations, nor is there evidence of practical implementation ensuring that EU adaptation policies are disability-inclusive.

Currently, the EU does not provide adequate support for persons with disabilities to play an active role as stakeholders in global, regional, and national climate negotiations. There is a need to ensure disability inclusion in the negotiations and outcomes of UN Climate Change Conferences (COPs), as well as in Parties' commitments. For example, the [EU Nationally](#)

[Determined Contributions](#) make no mention of persons with disabilities and fail to include concrete measures for their inclusion.

## **International cooperation and development (CRPD Article 32)**

The EU is one of the largest providers of Official Development Assistance (ODA) globally and is therefore uniquely positioned to advance disability-inclusive development and international cooperation. While references to the CRPD and disability inclusion have increased across EU external action policies, implementation remains fragmented, inconsistent and overly dependent on non-binding guidance.

Despite the EU's commitment to a twin-track approach, most EU-funded development projects do not meaningfully include or involve or promote the rights of persons with disabilities. According to OECD DAC data, around 37% of its ODA activities were disability-related. In other words, the remaining 63% of ODA activities were not disability-related in any significant way.

Organisations of persons with disabilities continue to face significant barriers in accessing EU funding and participating in programme design, implementation and monitoring.

Recent shifts in EU development policy towards a more geopolitical, infrastructure-focused approach, including through Global Gateway and Team Europe initiatives, raise additional concerns regarding CRPD compliance, civil society participation and accountability. These initiatives must be fully aligned with a human rights-based and disability-inclusive approach.

Looking ahead to negotiations on the next Multiannual Financial Framework (post-2027), it is essential that CRPD compliance and disability inclusion are embedded across all external action instruments (including the proposed Global Europe Instrument). Shrinking ODA budgets must not be an excuse for abandoning CRPD obligations. OPDs, including in EU partner countries, should systematically be consulted and meaningfully involved in all stages of programming EU funding for external action.

## **Recommendations for 2026–2030**

To accelerate progress in delivering the objectives of the EU Disability Rights Strategy related to EU external action, IDDC and EDF recommend the following improvements:

### **1. Adopt a new Disability Action Plan in EU External Action**

The EU should adopt a Disability Action Plan (DAP) in EU External Action, as a new flagship initiative to implement until 2030, to ensure disability inclusion across all EU external action. This is also a recommendation in the CRPD Committee's Concluding Observations.

The DAP should be similar to the existing [EU Action Plan on Gender Equality and Women's Empowerment](#) (GAP) and the [Youth Action Plan in EU External Action](#).

A DAP would offer a critical framework for European institutions, including EU Delegations and EU Member States, to adopt a systematic and disability-inclusive approach in their external action, encompassing both international cooperation and humanitarian action.

The Action Plan should cover five main thematic areas, with specific timeframes and indicators:

1. Respecting and mainstreaming the rights of persons with disabilities
2. Ensuring funding mechanisms and clear monitoring;
3. Ensuring full and effective participation and accessibility;
4. Developing and implementing fully inclusive policies, programmes and financing;
5. Strengthening internal and external disability-inclusive cooperation, coordination and partnership.

The outcomes of such a Plan would ensure that the rights of persons with disabilities are fully respected and systematically integrated into all EU external action policies and programmes. All EU-funded initiatives for external action would adhere to the principles of the CRPD. Persons with disabilities and their representative organisations would meaningfully participate in all EU external action decision-making processes on an equal basis with others. Their full and measurable inclusion would be guaranteed across policies, guidance and implementation.

Through consistent coordination between EU institutions, Member States and partners, the EU would strengthen internal coherence and position itself as a global leader in disability-inclusive external action.

## **2. Enhance the representation and recognition of expertise of persons with disabilities in EU external action processes**

In spite of the commitments in the current EU Disability Rights Strategy, there still is limited to no systematic consultation with OPDs in the majority of EU external action policy and programming processes. This should be seriously addressed in the next period, in conjunction also with the new [EU Strategy on Civil Society](#).

We also urge the EU to move its focus beyond mere “consultation” with persons with disabilities and OPDs, instead ensuring their meaningful representation and active involvement in EU processes, facilitating diverse voices—especially from under-represented and local groups.

OPDs should be recognised as key partners in planning, implementing, and monitoring EU programmes, and must be systematically included in civil society and human rights dialogues at all levels.

To empower OPDs, the EU should provide targeted technical, financial, and capacity-building support, enabling them to strengthen governance and human resources. Accessibility remains a fundamental requirement; the EU must accelerate efforts to make all EU Delegations fully accessible and inclusive. Existing guidance, such as the [EU Guidance note Leaving no one behind: Disability inclusion in EU external action](#) (2023), must be effectively implemented.

This is also a recommendation in the CRPD Committee’s Concluding Observations.

Currently, the EU lacks consistent disability focal points across its institutions and delegations, and where they exist, they often lack resources and time. The EU must appoint dedicated disability focal points, allocate sufficient resources, and ensure their mandate is robust.

### **3. Reinforce policy coherence for disability rights and inclusion in External Action**

The EU must reinforce the coherence between the EU Disability Rights Strategy and other existing and future EU External Action policies in order to ensure disability inclusion across all EU External Action. This includes the implementation and monitoring of the current EU Action Plan on Gender Equality and Women's Empowerment (GAP), the EU Action Plan on Human Rights and Democracy, and the EU Youth Action Plan as well as in the design, implementation and monitoring of all future action plans and policy frameworks. Equally important is the alignment with the new [EU Strategy on Civil Society](#).

The Concluding Observations also highlight the need to improve coordination of existing policies in EU external action to implement the CRPD.

### **4. Ensure funding for Disability Inclusion in external action, including for the implementation of the Global Gateway strategy**

In a context where cuts to development and humanitarian aid budgets and rapidly changing political priorities are placing EU ODA under immense strain, this should not be at the expense of disability rights and inclusion. While all EU funding must be CRPD compliant, the EU should increase funding that prioritises disability inclusion as a principal objective. More funding should be made available for OPDs, including those in partner countries, to support their vital role in driving inclusive development, climate and humanitarian responses.

All this needs to be translated into future decisions related to the EU's next Multiannual Financial Framework (MFF) and its financing instruments for external action. Concretely, the EU should include explicit references to the CRPD, and to the application of a human rights-based approach for all EU external action financing, in all policy and funding frameworks.

When programming EU funding, it is crucial that the EU applies a CRPD-compliant, human rights-based, and intersectional approach in the design, implementation, and monitoring of all EU funded programmes and initiatives. Through the current and future EU programming cycles, persons with disabilities and their representative organisations must be involved as equal partners in the process.

The EU's current Global Gateway strategy also raises specific concerns. It is unclear how disability rights and inclusion are being addressed, and the role of civil society, including of OPDs, is limited.

It is not acceptable that there are still no standard accessibility requirements that are used in EU public procurement rules and call for tenders, to grant EU aid money to contractors and implementing partners. The revised Strategy must reinforce the EU's commitment to accessibility and ensure that any infrastructure or other investments funded or co-funded by the EU require compliance with EU law, specifically the CRPD and the EU Fundamental Rights Charter.

Moreover, the EU should include safeguards into the fund specific regulations and any accompanying documents or strategies for the EU's external action, in order to prevent

investments in segregated settings for persons with disabilities. Such safeguards can include a prohibition of investing in institutions, clear definitions based on the CRPD and the use of sanctions.

## **5. Extend budget for community-based support beyond EU Member States**

We recommend to:

- Ensure the next EU budget supports independent living and the transition to community-based support and services in third countries.
- Apply rules prohibiting investment in institutions for persons with disabilities as stringently in third countries as within the EU, in line with the Common Provisions Regulation.

## **6. Ensure disability-inclusive climate action**

We recommend to:

- Make disability inclusion a central component of EU climate adaptation and mitigation policies, including the European Green Deal, EU Nationally Determined Contributions (NDCs), Climate Adaptation Strategy and the Just Transition Mechanism.
- Support the active involvement of persons with disabilities in global climate negotiations, including through advocacy for a recognised Disability Constituency under the UN Framework Convention on Climate Change (UNFCCC).
- Promote a just transition that ensures equitable benefits for persons with disabilities, including accessible training, skills development and job creation in green sectors.
- Allocate dedicated budgets for disability-inclusive climate action.
- Ensure disability disaggregated indicators and data collection to ensure disability-inclusive reporting.

## **7. Include persons with disabilities in humanitarian action**

We recommend to:

- Fully implement existing UN and EU guidelines, including the ECHO Guidance Note, the Sendai Framework and the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action.
- Ensure meaningful and continuous consultation with OPDs in humanitarian decision-making, civil protection systems and preparedness strategies.

## **8. Protect persons with disabilities in situations of conflict and fragile states**

We recommend to:

- Ensure protection and participation of persons with disabilities through dedicated funding and targeted actions in conflict, stabilisation, recovery and peacebuilding contexts.
- Anchor EU responses in international humanitarian law, including the Geneva Conventions and related frameworks.

## **9. Continue supporting reconstruction in Ukraine**

We recommend to:

- Organise a Reconstruction Conference focused on accessibility and universal design, with the participation of persons with disabilities and OPDs.
- Align reconstruction funding with the needs and recommendations identified by Ukrainian disability organisations.

## **10. Strengthen the inclusion of refugees and asylum seekers with disabilities**

We recommend to:

- Issue EU-level guidelines on ensuring the rights and support needs of refugees and asylum seekers with disabilities, including unaccompanied children with disabilities.
- Ensure the guidelines inform Member States' National Implementation Plans and the EU's implementation of the Pact on Migration and Asylum, with strong provisions on accessibility, protection and tailored support services.

## **11. Support disability rights in EU accession countries**

We recommend to:

- Enhance support to accession countries in implementing the CRPD, including guidance on labour market inclusion, inclusive education, independent living, and accessibility of transport and public spaces.
- Support national governments and local authorities in effectively using the Instrument for Pre-Accession (IPA), including access to expertise.
- Establish monitoring frameworks to ensure effective use of financial and technical resources.
- Support the disability movement in accession countries and involve OPDs in enlargement dialogues and reports.

## **12. Assume Global Leadership for disability rights and inclusion**

In the current EU Disability Rights Strategy, the European Commission has committed to enhancing the EU's political profile as a leading disability rights advocate in the global scene, with emphasis on the role of the EU in multilateral fora and on policy dialogues with partner countries.

We appreciate initiatives to invest in disability-specific mechanisms and spaces, noting for example, the election of a EU representative to the CRPD Committee, the EU participation in the Global Action on Disability (GLAD) Network, their hosting of the GLAD General Meeting in 2023, and the delegation of EU representatives to the Global Disability Summit in 2025.

However, we note the limited engagement of the European Commission's higher leadership, and the absence of targeted support to facilitate the participation of OPDs in key international spaces, or within the EU delegations to these events.

We place an emphasis on the need to demonstrate EU championing disability rights in policy spaces relating to global mainstream development, humanitarian action, climate action and

financing for development. It would have significant impacts if, for example, the EU would apply its global leadership, for example, in the monitoring and reporting mechanisms of the 2030 Agenda for Sustainable Development, especially the High-Level Political Forum (HLPF) on Sustainable Development; the UN Conference of the Parties on Climate Change (COP); the Commission on the Status of Women (CSW); and the Regional Forum for Disaster Risk Reduction (DRR).

We also need to see more and consistent efforts to address disability rights and inclusion in the EU dialogues with their partners, in processes like the EU-Africa Strategy, the Eastern partnerships post-2020 to the EU's engagement in Western Balkans, and ensuring these frameworks are implemented in full compliance with the CRPD.

We also expect that the EU and its Member States oppose the adoption of any laws or policies at the Council of Europe that do not comply with the CRPD.

In addition, in order to resist the hyper-prioritisation of humanitarian aid, we urge the EU to hold the line and assume leadership in promoting disability inclusive humanitarian action amongst donors and in discussions about the humanitarian reset.

### **13. Actively promote the Global Disability Summit (GDS) and its outcomes**

We recommend for the EU to make ambitious, bold and well-funded global commitments on international cooperation and humanitarian action at the next Global Disability Summit, backed by dedicated financial resources and measurable targets.

Additionally, to GDS25 progress reporting on IDA's commitment platform, provide a comprehensive progress report on the commitments made at the Global Disability Summit 2022 and 2025, demonstrating transparency and leadership in advancing global disability rights.

### **Further resources and joint EDF-IDDC positions**

- [EDF-IDDC joint analysis of the EU Strategy for the rights of persons with disabilities 2021-2030](#) (2021) - Priorities and Annex + Priorities
- [EDF-IDDC Input for the List of Issues Prior to Reporting for the second review of the EU by the CRPD Committee](#) (2022)
- [Joint Input by EDF and IDDC on the EU's review by the CRPD Committee focusing on external action](#) (2025)
- [EU Concluding Observations by the Committee on the Rights of Persons with Disabilities](#) (2025)
- [EDF's input for the Consultation for the Second phase of the EU Strategy for the rights of persons with disabilities](#) (2026)