

Stakeholder Group of Persons with Disabilities’ response to the [2022 Financing for Sustainable Development Report](https://www.un.org/development/desa/financing/sites/www.un.org.development.desa.financing/files/2022-03/AUV_2022%20FSDR_1%20Mar.pdf) (advanced unedited draft)

* The Stakeholder Group of Persons with Disabilities is an active participant in the Civil Society Financing for Development Group and the Women’s Working Group on Financing for Development. These comments do not seek to repeat the points that those groups are already making, but rather to complement their inputs with a more in-depth look at some issues key to realising rights and social justice of persons with disabilities.
* We **welcome that the draft Financing for Sustainable Development Report (FSDR) includes references to persons with disabilities,** in the sections on social protection (pp. 52 and 54), IDA replenishment (p.108) and remote/digital learning (p.198).
* However, we are concerned that these are the report’s only references to persons with disabilities – who represent some 15% of the global population[[1]](#footnote-1) and experience particularly extreme inequalities. Further, we are worried that these three references seem to reduce the rights and social justice of persons with disabilities to a peripheral issue within the financing for development agenda, which can be tackled through top-ups to a small number of existing initiatives – rather than recognising that **persons with disabilities are hit disproportionately hard by inequalities and injustices right across the global economic system**, and that wider issues of economic justice are inherently also disability rights issues.[[2]](#footnote-2)
* For example, the following issues are all critical to the enjoyment of rights and social justice by persons with disabilities, and we call for all three issues – including their implications for persons with disabilities – to be given prominence in the FSDR’s final draft: the need for a universal, intergovernmentalUN **tax** commission and a UN Tax Convention to address tax havens, tax abuse by multinational corporations and other illicit financial flows;[[3]](#footnote-3) for an open-ended intergovernmental working group to work towards a binding and multilateral framework for **debt** crisis prevention and resolution; and for an immediate moratorium on Investor-State-Dispute-Settlement (ISDS) cases and on all **trade and investment** agreements that compromise policy space to promote human rights and equalities.[[4]](#footnote-4)
* We also call for the FSDR to include more references to the rights and equality of persons with disabilities in other sections. Such references should include, but need not be limited to, the following:
  + The disproportionate impact of **austerity** programmes on persons with disabilities (p.17), and the need for international public finance to be provided free from **economic policy conditionalities** that restrict fiscal space (Chapter IIIC, including section 3).[[5]](#footnote-5)
  + The latest evidence on the **inclusion of persons with disabilities in ODA spending**. Since 2018, the OECD has tracked disability inclusion in ODA using a policy marker very similar to its gender equality marker. This data is readily available in a format that has been agreed by the OECD Development Assistance Committee.[[6]](#footnote-6) It is hard to understand why the FSDR has not included this data in its report when it has included parallel data on gender (p.101), and we worry that this omission risks perpetuating the same exclusionary norms that the OECD’s new disability policy marker seeks to confront. The Stakeholder Group of Persons with Disabilities would be pleased to provide any further information that could help the FSDR to include such analysis in the final version of its report.
  + The implications that different *types* of ODA spending have for the enjoyment of rights and social justice by persons with disabilities. For example (p.103)**, grants rather than loans** have a particularly important role to play.[[7]](#footnote-7) And (p.110-112), as the former UN Special Rapporteur on Disability found in her 2020 report on international cooperation, the disability rights implications of private sector instruments should be assessed before any decision is made to invest ODA resources in this way.[[8]](#footnote-8)
  + The criticality of gathering **data on persons with disabilities** as part of the SDG monitoring framework (Chapter IV).[[9]](#footnote-9)

1. World Bank/World Health Organisation, 2011, [World Report on Disability](file:///C:\Users\Kitty\Downloads\9789240685215_eng.pdf), p.29 [↑](#footnote-ref-1)
2. For more analysis on this issue, please see Stakeholder Group of Persons with Disabilities, 2021, [Financing rights and social justice for persons with disabilities in the era of COVID-19 and beyond](https://www.internationaldisabilityalliance.org/financing-covid19-beyond) [↑](#footnote-ref-2)
3. See Eurodad and the Global Alliance for Tax Justice’s recent [Proposal for a United Nations Convention on Tax](https://assets.nationbuilder.com/eurodad/pages/2852/attachments/original/1646838596/un-tax-convention-mar09-final.pdf?1646838596), which includes specific reference to reporting on whether “tax systems, policies and practices promote implementation of international goals, obligations and commitments relating to … the rights of persons with disabilities » (Article 13 paragraph 3). [↑](#footnote-ref-3)
4. For more detailed analysis on the extraterritorial impacts of tax and debt policies on the rights of persons with disabilities, please see CBM Switzerland, 2022, [How far do Switzerland’s policies on financing for development (particularly tax and debt) promote rights and equality of persons with disabilities?](https://www.cbmswiss.ch/fileadmin/user_upload/Dokumente/Unsere_Arbeit/Politische_Arbeit/Events/financing-for-development-factsheet-switzerland.pdf)  [↑](#footnote-ref-4)
5. Office of the High Commissioner for Human Rights, 2013, ‘[Report on austerity measures and economic and social rights](https://www.ohchr.org/Documents/Issues/Development/RightsCrisis/E-2013-82_en.pdf)’, p.21. For analysis on how austerity policies linked to IMF loans jeopardised access to healthcare and social protection for persons with disabilities in Argentina, see Associación Civil por la Igualdad y la Justicia, 2019, ‘[Las personas con discapacidad no son una prioridad para el Gobierno argentino](https://acij.org.ar/las-personas-con-discapacidad-no-son-una-prioridad-para-el-gobierno-argentino/)’; and Brunswijck, Meeks and Viera, 2019, ‘[IMF is failing people with disabilities in Argentina](https://www.devex.com/news/opinion-imf-is-failing-people-with-disabilities-in-argentina-95181)’ [↑](#footnote-ref-5)
6. See OECD, 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(2020)48/en/pdf) [↑](#footnote-ref-6)
7. For more analysis on this issue, please see Stakeholder Group of Persons with Disabilities, 2021, [Financing rights and social justice for persons with disabilities in the era of COVID-19 and beyond](https://www.internationaldisabilityalliance.org/financing-covid19-beyond), p.8 [↑](#footnote-ref-7)
8. UN Special Rapporteur on the rights of persons with disabilities, 2020, A/75/186, [Disability inclusive international cooperation](https://undocs.org/en/A/75/186), p.19 [↑](#footnote-ref-8)
9. See for example UN Committee on the Rights of Persons with Disabilities [General Comment no.7](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/7&Lang=en), paragraph 91. [↑](#footnote-ref-9)