Consumers International

Project Proposal to IDRC on Adding A2K Principles to the UN Guidelines for Consumer Protection

Final version – July, 2011

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Executive summary

The United Nations Guidelines for Consumer Protection are a soft-law instrument which provide an influential standard for the dissemination of good practices in consumer protection, as a mechanism to foster and promote social and economic development. They outline eight areas for developing policies for consumer protection, which have been translated into eight consumer rights by the consumer movement: rights to satisfaction of basic needs, safety, choice, information, consumer education, redress, representation and a health environment.

But the position of the consumer has changed considerably since the Guidelines were first passed in 1985. In particular, consumers in the online and digital environment are faced with both new opportunities (such as the rise of the consumer-creator), and new threats to their rights to participate in cultural, civic and educational affairs (such as the use of digital locks to limit fair use rights and access to the public domain). Such important issues of access to knowledge (A2K) are not covered by the UN Guidelines, nor by any other international instrument. The aim of this project is to develop research-based advocacy materials that will enable Consumers International and its members to campaign for the adoption of new amendments to the UN Guidelines to include A2K principles.

Problem and justification

While there are many international instruments to protect those who have interests in controlling the dissemination of knowledge (such as the intellectual property provisions of the TRIPS Agreement), there are none to protect consumers’ interests in accessing such knowledge. Even though WIPO (the World Intellectual Property Organisation) has adopted a Development Agenda that requires it to discuss how “to further facilitate access to knowledge and technology for developing countries and LDCs,” there is scant
evidence of this having affected the activities of the organisation, which continues to treat the interests of rights-holders as pre-eminent. For example, there has been stiff opposition to the introduction of a new WIPO treaty that would facilitate access to copyright works by the blind, vision-impaired and reading disabled.

There have been various proposals for the rebalancing of global copyright norms at an international level, such as through an A2K treaty, draft text for which was developed during 2005. However these endeavours have stumbled when faced with the seemingly insurmountable difficulty of negotiating a pro-A2K legal instrument at an international level in forums dominated by large developed economies such as the US, EU and Japan.

The answer is to step outside the WIPO and intellectual property regime, and to approach access to knowledge (A2K) from another angle altogether: that of consumer protection. In this context, the UN Guidelines for Consumer Protection offer a promising alternative instrument for protecting consumers' interests, especially in the developing world. The Guidelines are a soft law instrument, but a very influential one, adopted by a number countries in their national law. Amendments to the Guidelines would be negotiated in the General Assembly, where the power of developed economies is less dominant than in venues such as WIPO and the WTO.

Approved by the UN General Assembly in 1985, the Guidelines establish a baseline standard for consumer protection and acknowledge that “consumers in all countries, particularly those in developing countries … should have the right of access to non-hazardous products … as well as the right to promote just, equitable and sustainable economic and social development”. From 1995 to 1999, Consumers International led a successful campaign to have the Guidelines revised, to include sustainable development principles.

However, these amendments were always understood to be “a first step”; the UN Secretary-General noting that in order to ensure “the relevance of the guidelines in the light of new economic trends,” the Guidelines might also have to be expanded into “other areas, such as new information systems [and] telecommunication[s]”.¹

We therefore now aim to have the Guidelines revised again to include A2K principles. This would for the first time provide an international soft law instrument that consumers can use to advocate for laws and corporate practices that promote access to knowledge. The advocacy and coordination costs of this project are supported by a small grant from OSI made in September 2010. The research component of this project is yet unfunded, and it is for this that the current proposal is now made to IDRC.

References:

Here are the main resources that we will be using for reference in compiling the amendments to the United Nations Guidelines for Consumer Protection.

- Adelphi Charter on Creativity, Innovation and Intellectual Property (Adelphi, 2005)
- Charter of Human Rights and Principles for the Internet (IRP, 2010)
- Bill C-32 (Canada, 2010)
- Charter for Innovation, Creativity and Access to Knowledge (FCForum, 2009-2010)
- Charter of Consumer Rights in the Digital World (TACD, 2008)
- Charter on the Preservation of Digital Heritage (UNESCO, 2003a)
- Consumer Technology Bill of Rights (DigitalConsumer, 2002)

Objectives

The research component of the project is expected to result in:

- The establishment of a sound evidence base to help support advocacy for the adoption of A2K amendments to the UN Guidelines for Consumer Protection.

- Increasing the capacity of the global consumer movement, particularly in the global South, to engage in research-based advocacy to support policy changes at an international level.

Methodology

Activities

The methodology for this project involves the following four main activities:

1. Drafting the proposed UN Guidelines amendments themselves. These are being drafted in consultation with our members and A2K scholars and activists, drawing on CI's own work, as well as secondary research sources. Drafting is being conducted principally online (at http://A2Knetwork.org/guidelines), but also with one face-to-face meeting which is to be held in May 2011. (This part of the project is supported by OSI.)

2. Drafting a detailed public background paper to explain and support the proposed amendments, based on primary and secondary research, which will be used directly in our advocacy work. (For this, support is requested from IDRC. For further details see under “Results and dissemination” below.)

3. Developing a resource manual to be used privately by CI and its members in developing and executing campaigning activities in support of the proposed amendments. (For this, support is requested from IDRC. For further details see under “Results and dissemination” below.)

4. Engaging in an ongoing programme of advocacy and campaigning work. (This part of the project is supported by OSI.)

Activities 1 and 4 are supported by OSI, whereas activities 2 and 3 (that is, drafting the background paper and the resource manual) are those for which support is sought from IDRC. In the table below, only the activities that are to be supported by IDRC are listed.
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<th>Phase</th>
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<tr>
<td>Planning</td>
<td>Selection of subject countries for participation in the research, considering diversity of region, legal system and level of development, as well as likely support from government</td>
<td>Commitment of members to this campaign will facilitate early approaches to their governments for support for the amendments during the project's advocacy phase</td>
<td>Q1-Q2 of project term</td>
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<td>Secondary research</td>
<td>Secondary data collection of laws, regulations, codes and policies that amount to existing good practices that implement the proposed new Guidelines on A2K</td>
<td>Developing an evidence base to support advocacy for the new Guidelines from current national practices and existing international norms</td>
<td>Q3-Q5</td>
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<td></td>
<td>Collecting materials to justify amendments to the Guidelines that go beyond current national practices, from other international instruments and UN reports</td>
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<td>Primary research</td>
<td>Where secondary research does not fully or adequately support the proposals, engaging in primary research in target countries, utilising consumer surveys, interviews and consumer protection agency data where available, and building on CI's existing research base</td>
<td>Demonstrating A2K access barriers that show unmet consumer needs, particularly in the global South, and thereby filling any gaps in the base of evidence we have developed in support of the new Guidelines through secondary research</td>
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<td>Reporting</td>
<td>Development of the resource manual recording lessons learned and tactical recommendations for the ongoing UN Guidelines campaign</td>
<td>Providing a road-map for internal use of CI and its members to direct future campaigning on the Guidelines</td>
<td>Q6-Q8</td>
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<td></td>
<td>Publication and dissemination of the background paper to support our ongoing advocacy activities</td>
<td>Providing a record and synthesis of our secondary and primary research which can be used as a tool in our ongoing advocacy work</td>
<td>Q7-Q8</td>
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**Strategy**

In developing these amendments, as well as conducting and disseminating our research about them, our overall strategy will be to frame the proposal as one of consumer rights rather than intellectual property rights.

Our outreach will therefore targeted at public and private stakeholders participating in relevant policy discussions on consumer rights and related issues such as development, communications, cultural diversity and human rights. Such discussions are conducted in diverse fora including UNCTAD, UNESCO and the Internet Governance Forum.

Accordingly, we will not target WIPO or the WTO with our outreach, these being institutions in which the amendments would be framed more narrowly. Neither will we focus on multilateral institutions whose development dimension is missing or weak, such as the G8 or OECD.

An example of how the amendments on sustainable consumption were campaigned for by Consumers International is illustrated below:
1. A series of regional seminars and conferences on consumer protection organised in 1996 and 1997 that “prepared the ground” for the amendments.²
2. The development of proposed text, that included narrative commentary that justifies and explains each suggestion.³
3. Sitting on the United Nations Inter-Regional Expert Group on Consumer Protection and Sustainable Consumption, that considered the draft amendments before forwarding them on for intergovernmental approval.⁴
4. By way of follow-up, Consumers International conducted a survey and published a report on the implementation of the new Guidelines upon their tenth anniversary.⁵

Targets

In the instance of the sustainable consumption amendments the text was drafted at the invitation of the UN after that issue was already on its agenda. However, CI has established a relationship with UNCTAD at a senior level to place A2K on its agenda for 2012. This relationship already shows much promise, with the head of UNCTAD’s Competition and Consumer Policy Division, Hasan Qaqaya, having delivered a very supportive presentation at our recent global meeting in Hong Kong.⁶

A2K has already been on the agenda at UNESCO. That organisation is primary responsible for implementation and follow-up of the action line on “Access to information and knowledge” agreed at the World Summit on the Information Society (WSIS) in 2003. Indeed the draft amendments to the Guidelines already incorporate references to UNESCO instruments such as the UNESCO convention on the protection and promotion of the diversity of cultural expressions.⁷ Accordingly we will be targeting UNESCO alongside UNCTAD in our outreach, and seeking opportunities to present our research there.

The issue is also already on the agenda of the Internet Governance Forum, where the campaign on the Guidelines was officially launched last year. This forum will also be a continued strategic focus for this project.

Finally, we will be cultivating relationships with governments who will be able to advocate for the Guidelines amendments in intergovernmental fora to which CI has no direct access. Our first port of call will be the Brazilian government, with whom we already have contacts through our member IDEC and the Fundação Getulio Vargas (FGV) Law School.

Results and dissemination

The tangible results of the research component of the project are a background paper and a resource manual. These are described in more detail below:

²Ibid, paras 18-22 and 59.
⁷However, the excision of any provisions on intellectual property from this convention underscores the difficulty of negotiating binding text on this issue: see Coalition française pour la diversité culturelle, Relationship of the future UNESCO convention on the protection and promotion of the diversity of cultural expressions to intellectual property rights (2005), available at http://www.coalitionfrancaise.org/actus/doc/declaration_unesco_coal_280705.pdf.
The background paper, which would be supported entirely by IDRC, will be in two chapters, each addressing a distinct but complementary issue required for the success of the broader campaign:

1. Research on which of the proposed amendments correspond to existing good practices in national consumer protection law or policy. This will provide evidence to underpin our advocacy for the inclusion in the Guidelines of all the pro-A2K policy principles already found amongst UN member nations.

2. For proposed amendments that go beyond existing national law or policy, providing evidence to justify these amendments based on other international legal instruments, and (where relevant) primary research about unmet needs of consumers. This research will build on our recently-completed 24-country/15,000-consumer A2K access barrier survey, and will explicitly incorporate different gender perspectives.

The background paper will be translated into French and Spanish and published on the Consumers International Web site. Its release will be announced to the press and to our members and project partners. It will be delivered to governments to whom we are campaigning for the adoption of the amendments. It will also be tabled at relevant United Nations meetings including, it is hoped, the 2012 UNCTAD Public Symposium.

If the paper achieves its desired objectives in facilitating the adoption of the proposed amendments, the development impacts will be significant:

- it will for the first time provide developing countries with a soft law instrument that can be used in resisting bilateral pressure to adopt TRIPS-plus intellectual property laws and enforcement practices, or other trade measures that are adverse to A2K;
- it will provide activists and scholars with a new tool to campaign for the reform of national laws and policies to advance the A2K interests of local consumers.

Resource manual

Also to be supported entirely by IDRC, the purpose of the resource manual would be to ensure that knowledge about advocacy and campaigning tactics and techniques specific to the UN Consumer Guidelines is recorded. In turn, there are two reasons why this is important.

First, advocating for changes to the UN Consumer Guidelines is a long-term process. The previous set of amendments on sustainable consumption, based on a draft produced by Consumers International, were finally adopted in 1999 only after a lengthy four-year process. Over this time period, knowledge can be lost when involved personnel leave, if not captured and preserved in CI’s long-term organisational memory.

Second, even without staff turnover, the web of relations between UN departments (such as ECOSOC, the UNDP, UNCTAD and UN DESA) is complex and cannot be managed effectively without adequate attention to institutional capacity building. One of the purposes of the resource manual will be to create such a capacity building resource, which can be used both by CI and by other NGOs involved in similar advocacy work.

The resource manual will be disseminated through different channels to the background paper, in that it is intended for capacity building within the consumer movement rather than for use in external communications with governments and intergovernmental organisations. However, like the
background paper, it will be translated into French and Spanish and disseminated through our global network of 220 member organisations in 115 countries, and made available to project partners.

The main development impact of the resource manual is that the global consumer movement will be better equipped to advocate for policy changes at intergovernmental level, not only in respect of the A2K amendments to the UN Guidelines, but also in other negotiations and other intergovernmental venues that involve similar tactics and techniques.

Link between outputs and objectives

The background paper, in particular, is a necessary pre-condition of the ultimate objective of amending the UN Guidelines. Without evidence-based research to justify the amendments being suggested, it is impossible that those amendments would be agreed by governments.

The research that CI conducted in support of the sustainable consumption amendments was integral to the text and was included verbatim in a background paper prepared for the Expert Group by the Secretariat of the Commission on Sustainable Development in 1998.8

The same approach, pairing substantive text with evidence-based commentary, has commonly been adopted with the text of other draft international instruments; for example see the IFLA Draft Treaty on Copyright Exceptions and Limitations for Libraries and Archives.9

The funding from IDRC will be used to provide similar similar commentary in support of the A2K amendments to the Guidelines. In that sense, the link between IDRC's support and the desired outcome is quite direct, and we expect that our IDRC-supported research will strongly influence the achievement of the project goals.

Institution and personnel

A. About Consumers International

CI is the only independent global campaigning voice for consumers. With over 220 member organisations in 115 countries, we are building a powerful international consumer movement to help protect and empower consumers everywhere. For more information, visit www.consumersinternational.org. Consumers International marks 50 years of the global consumer movement in 2010.

B. Overview of Consumers International's A2K project

Consumers International's (CI's) Access to Knowledge project commenced in late 2008, with funding from Ford Foundation and the Open Society Institute (OSI). Its aim has been to ensure that consumer interests are adequately represented in national and global debates around intellectual property (IP) and communications rights. This objective has been advanced through a number of successful activities:

- Establishing a Global Consumer Dialogue on A2K, which is a network of consumer groups and like-minded NGOs committed to working to advance access to knowledge for consumers;

8UN DESA, supra note 3, 5.
• Bringing together participants in the Global Consumer Dialogue at regional meetings for the Asia-Pacific, Latin American and African regions, to network and build their institutional capacity, and to develop a strategic plan on A2K for the global consumer movement;

• Releasing two editions of the IP Watch List, covering 16 countries in 2009 and 34 on 2010, which highlight to what extent those countries’ laws and enforcement practices support consumers’ interests in access to knowledge;

• Embarking upon a global survey on the barriers/obstacles that consumers in 25 countries face in accessing and using copyright material;

• Conducting national research in Australia and Israel on the adoption of consumer-friendly copyright limitations, as possible models of good practices;

• Producing a short film to highlight the need for reform of intellectual property laws and enforcement practices to meet consumers' needs – see http://A2Knetwork.org/film;

• Compiling a handbook titled Access to Knowledge: A Guide for Everyone, to provide a concise and non-specialist introduction to A2K issues for the consumer movement and like-minded NGOs;

• Conducting a Business Roundtable on the Consumer Interest in Intellectual Property Rights in Paris, with contributions by key business and civil society leaders;

• Funding grassroots advocacy and campaigning activities of our members, including campaigns on national copyright law in Nigeria and Brazil, establishment of a social media platform in South Africa, capacity building for librarians in India, and advocacy on book prices in Cameroon and Zambia; and

• Representing the interests of consumers at important international meetings such as those of WIPO’s Standing Committee on Copyright and Related Rights (SCCR), and at the Internet Governance Forum (IGF).

Consumers International has been fortunate to secure support from OSI to continue our work on Access to Knowledge, with six activities to be conducted from 2010-2012, subject to a co-funding requirement imposed by OSI. The headline activity is the campaign seeking the revision of the UN Guidelines for Consumer Protection, for which additional support is also now being sought from IDRC.

C. How CI contributes to its members’ work

The first two years of the project have focussed largely on building the capacity of consumer groups on A2K issues and starting to engage them. Some have participated in our global projects such as the global access barrier survey and the IP Watchlist described above. Others have responded by taking the lead on national campaigns.

As a result, CI has a coalition of approximately 50 consumer groups predominantly from Asia, Africa and Latin America, that are now familiar with A2K issues and are willing to play a more active role in the second phase of this project. This exceeds our target of 20 groups originally envisaged in our 2008 project proposal to Ford Foundation and OSI. They are joined by partner groups from broader civil society specialised in human rights or other areas, who also participate in the coalition. All remain actively involved through our A2K listserv and interactive Web site, http://A2Knetwork.org.
CI sees the second phase of the A2K project, which began in late 2010, as the phase where we will build on the work to date, i.e. members' awareness and capacity and be able to focus on strategic campaigns and policy analysis as outlined in this proposal with the goal of shifting policy and practice.

CI will also continue to support our members in their national work, through the capacity building we undertake at regional meetings; our Web resources and listserves to which members have access; regular consultations with the Project Coordinator; sub-grants from project funding (where available); and network-building particularly between Northern and Southern members as is standard practice for CI. Lisa Gunn, Executive Director of CI member IDEC writes:

Consumers International's global programme on Access to Knowledge has been highly beneficial for IDEC in its own work at a national level. It has assisted us in linking up with other members on these issues, and has made it easier for us to raise the profile of our own work at regional and international meetings. Whilst IDEC has been fortunate to secure its own funding for work in this area, many smaller members would not have the capacity to engage on these important issues were it not for the leadership of CI, and the assistance that it offers them in capacity building, coordination, and financial and institutional support. CI has an extremely important hole not only in coordinating and assisting its members, but also it has the potential to be an international voice for consumers in developing countries in the global debate on right to communication and A2K.

D. How CI's members will participate in this campaign

This is by nature a global campaign, and given our previous success in pushing for the last revision of the Guidelines, Consumers International is uniquely qualified to lead it. Regional meetings held in the Asia-Pacific, Latin American and African regions during 2009 and 2010 reaffirmed members' interests and commitment to working on the area of the UN Guidelines. We intend to involve as many of our over 220 members as possible in this work, covering all regions of the globe.

Already, members from all regions have been invited to contribute to the campaign by developing proposed amendments of the Guidelines. Those Southern members who accepted are from Brazil, Chile, Egypt, Fiji, Kenya, India, Lebanon, Malaysia, Peru, Uganda and Zambia. These members are currently participating without any funding.

Once the research component of the project is approved by IDRC, members will be approached again to volunteer to participate in country-level research under the guidance of CI's project secretariat, this time with sub-grants of funding to support their work. Most likely the above members will be amongst those that will express the most interest in participating in national research on the amendments.

As indicated above in the section on Methodology, the secondary desk research will be performed first, and CI will do this centrally. CI's researcher may require assistance from our members in ascertaining the provisions of local IP regimes. If so, we will seek such assistance by means of an online questionnaire for completion by the member or a local expert whom the member will consult.

Member involvement will be more intrinsic to the primary research, the purpose of which is to investigate unmet consumer needs that would be addressed by the proposed new Guidelines. The primary research will utilise a survey instrument designed by CI (with input from members) for administration to consumers in the member's country.

The primary survey instrument will be able to be administered either online, telephonically, in paper format, or in focus groups. The same method has been used by CI with success in its 2010 A2K access barrier survey, and is currently being used for a global survey on broadband. A copy of these survey instruments can be supplied to IDRC upon request.
The selection of primary research sites will be dependent in some measure on the capacity and interest of CI's participating members, however there will be a strong rationale for selecting the following countries to participate in the primary research if possible:

(a) Brazil. Brazil's new draft copyright law forms the basis for a number of provisions of the draft amendments to the Guidelines, including provisions that would limit suppliers' entitlements to override consumer fair dealing rights through technological means. By investigating the background to the proposed amendments in Brazil, we hope to throw light on the underlying consumer needs that a similar provision would address.

(b) Canada. One of the most innovative provisions of the recently-lapsed Canadian Bill C-32 would have been to legalise the use of copyright works by consumers in the creation of new works to be distributed non-commercially. This issue, which we have also addressed in the draft new Guidelines, is a significant conundrum of copyright in the Internet age, which we hope to be able to address through research in collaboration with our Canadian membership.

(c) South Korea. This is a country with notoriously TRIPS-plus Free Trade Agreements pending with both the United States and the EU. Yet its provision related to sharing of copyright works within a limited circle is remarkably better than similar provisions from many other countries, both developed and developing. How has this provision been used for the benefit of consumers within South Korea?

(d) India. Together with Brazil, and as one of the rising BRIC powers of the South, India's influence on the adoption of the proposed amendments to the UN Consumer Guidelines will be considerable. We hope that one of the areas in which its influence may be greatest is on the vexed issue of Technological Protection Mechanisms (TPMs). India's new provision on TPMs is one of the most balanced in the world, and has been a model for the new Guidelines.

Another opportunity for the participation of Southern members will be to co-host regional outreach meetings on the amendments in their countries, as occurred with the sustainable consumption amendments in 1998 as described above. Provision for such meetings has been made in the budget.

CI’s Southern members will require ongoing support – technical, information, and institutional – if they are to sustain their activity in this area in the medium term. The project coordinator will act as a support resource, and this role will include facilitating partnerships between larger CI members and smaller members from developing countries (this is standard operating procedure for CI) as well as assisting in identifying follow-on funding opportunities.

E. Project secretariat

The project will be led by Consumers International’s Project Coordinator for Intellectual Property and Communications, Dr Jeremy Malcolm, based in CI's Regional Office for Asia-Pacific and Middle East in Kuala Lumpur, Malaysia. Jeremy works under the supervision of the Regional Head, Indrani Thuraisingham.

Jeremy's background is as an information technology and intellectual property lawyer and IT consultant, specialising in intellectual property and Internet governance. He is admitted to the bars of the Supreme Court of Western Australia (1995), High Court of Australia (1996) and Appellate Division of New York (2009). Outside of CI he is the joint coordinator of the Civil Society Internet Governance Caucus.

F. Consultants

Robin Brown will be retained as a consultant on this project. Robin has 25 years of experience in consumer and business regulatory affairs. He spent 10 years as the chair and chief executive of Australia’s national consumer body, the Australian Federation of Consumer Organisations. He also
spent five years as an associate member of the board of the Australian Telecommunications Authority (AUSTEL) and oversaw its privacy study.

Robin has been involved in the establishment of industry-specific dispute handling mechanisms in the banking, life insurance, health insurance and telecommunications sectors, including four years as a member of the Life Insurance Industry Complaints Panel. He was a member of the inaugural Banking Industry Ombudsman Council.

Robin works as a consumer affairs consultant on projects relating to various industry sectors and on government complaint handling systems. He has been involved in projects to advance consumer protection and competition policy and regulation in a number of developing countries.

Robin is member of the Australian Council for International Development Code Committee and in recent years has served as a Councillor of the Australian Consumers’ Association, President of the ACT Council of Social Service and member of the ACT Community Inclusion Board and. He holds a BA and a Master of Public Policy from the Australian National University.

During later stages of the research project other consultants may be retained for their special expertise in particular areas.

**Timetable and budget**

A timetable for this project is given in the “Methodology” section above. Research will be completed and project outputs will be published within two years from the grant of funds. It would be most useful if these could be released early in IDRC’s next grant period. Since the first year of OSI’s two-year contribution to the project ends at the end of August 2011, we propose commencing on 1 September 2011, so that there is exactly a one-year overlap of funding.

The broader campaign for amendment of the UN Guidelines, inclusive of the funding from OSI, was launched in September 2010 at the fifth meeting of the Internet Governance Forum, to coincide with the 25th anniversary of the UN Guidelines for Consumer Protection. The grant from OSI is also for a two year period, which will therefore expire somewhat earlier than the requested grant from IDRC.

As outlined in the Methodology section above, this will supplement a grant from OSI. The total grant from OSI is $150,000 for several campaigning activities, of which $25,000 is for meeting, travel and advocacy costs specifically related to the UN Guidelines campaign, and $64,000 for other campaign work. 30% of the remaining administrative and personnel budget of $61,000 from OSI has been attributed to the UN Guidelines campaign here.

Travel funding will be part of both the IDRC and OSI budgets. However, the bulk of this comes from OSI. In order to preserve the division between the research activities supported by IDRC and the advocacy and campaigning activities supported by OSI, the travel funding provided by IDRC will be utilised for presentation of the research to our partners and other academic or civil society audiences, rather than to governments.

Exactly when the proposed amendments will be adopted at the UN, if at all, is inherently unpredictable. Therefore the campaign will most likely be ongoing, particularly in its final advocacy phase, which in CI’s experience can last for several years until success is achieved. In this event, additional funding may be sought from appropriate sources after the OSI and IDRC funds have been expended.

A draft project budget is attached as an Excel file, in the format provided by IDRC.