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Developments and Challenges of Designing National Human Rights Action Plans: 1994–2024

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Abstract

Even though National Human Rights Action Plans (NHRAPs), as recommended in the Vienna Declaration and Programme of Action, have developed dramatically over the last three decades in more than 80 counties, there are as yet no universal standards and criteria for guidance and evaluation of NHRAPs in practice. This study aims to serve two purposes. First, adopting the general theory of human rights action planning, it explores the four key dimensions of NHRAPing, *National-ness, Human rights-ness, Action-ness, and Plan-ness*, putting forward 13 criteria which can be employed not only for measuring the degree of success in designing NHRAPs, but also as guidance for preparing, developing, implementing, monitoring, and evaluating these plans. Second, using these general criteria, this research conducts an extensive longitudinal study of 82 NHRAPs, developed between 1994 and 2024 and available in English, to uncover the general patterns, differences, developments, and challenges of designing these plans in practice.

Practitioner points

A well-designed National Human Rights Action Plan requires:

- being in alignment with international human rights principles, comprehensive in scope with high level and degree of participation in different phases of planning (*human rights-ness*).
- including specific activities, timeframe, and lead bodies (*action-ness*).
- being forward-looking, building upon an evidence-based situation analysis with monitoring and evaluation mechanisms (*plan-ness*).
- being context-sensitive taking a nationally coordinated approach (*national-ness*).

Keywords: National Human Rights Action Plan; human rights-ness; action-ness; plan-ness; national-ness

1. Introduction

The idea of adopting a National Human Rights Action Plan (NHRAP), as recommended in the Vienna Declaration and Programme of Action, turned 30 in 2023. It was put forward as a response strategy to the lack of consensus on how to put human

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rights, as embodied in international human rights law, into practice in a coherent, comprehensive, and systematic way and to the need for a more proactive move than merely enacting bills of rights and offering judicial remedies. In 2017, in a historic move, the UN General Assembly marked NHRAPs as one of the 'key elements' of national human rights systems and strongly encouraged the states to adopt such plans systematically and in a participatory process (UNGA 2017). As of today, at least 155 NHRAPs have been adopted in more than 80 countries from across every region of the world, with 35 countries having adopted more than one plan, and more than 30 plans are in the process of development (The Danish Institute for Human Rights: An Inventory on NHRAPs). More than half of the NHRAPs have been adopted in the last 10 years. Geographically, NHRAPs have been predominantly developed in Africa (31 per cent), followed by Europe (28 per cent), Asia-Pacific (25 per cent), and Latin American and Caribbean (16 per cent) (Lorion 2022).

Different countries have taken different approaches in designing such plans and as a result, current NHRAPs vary enormously. In length, NHRAPs range from 3 to 458 pages. In terms of duration, the NHRAPs vary from 2 to 11 years, though some plans are left open-ended. Jordan, for example, developed a 27-page plan for a period of 10 years (2016–2025), whereas Greece had a 331-page plan for a period of 3 years (2014–2016). Some countries, such as Finland, related the duration to each government's term. These dissimilarities go beyond superficial differences in form, length, and duration of plans and include more fundamental differences such as the concept and types of rights embodied, the process of planning, and the degree and types of participation. Such profound differences raise questions as to what is required for a plan to be considered as a NHRAP? How to develop a well-designed NHRAP? How successful has been designing NHRAPing 30 years on? What standards can be used to evaluate success in designing such plans? A major problem, which must not be lost sight of, is the lack of universal standards and criteria for guidance and evaluation of NHRAPs in practice.

As such, this study (1) explores the four key dimensions of NHRAPing, that is *nationalness*, *human rights-ness*, *action-ness*, and *plan-ness*, at the conceptual level; and (2) conducts an extensive longitudinal textual analysis of all NHRAPs, developed between 1994 and 2024 and available in English (overall: 82 NHRAPs), at the empirical level in order to serve two purposes. First, it puts forward a set of criteria which can be employed not only for measuring the degree of success in designing NHRAPs, but also as a guidance for preparing, developing, implementing, monitoring, and evaluating these plans. Second, using these general criteria, this study uncovers the general patterns, differences, developments, and challenges of designing NHRAPs over the last three decades in practice.

This article proceeds as follows. Section 2 provides a brief outline of the theoretical framework upon which this research is based and clarifies the research methods employed. Drawing from the basic tenets of the general theory of human rights action planning, developed by this author elsewhere (Chalabi 2018), Section 3 puts forward a set of general criteria for each dimension of NHRAPing. It consists of four sub-sections each of which explores a dimension. Section 4 is allocated to the empirical findings of the comparative longitudinal study of 82 NHRAPs conducted as part of this research. It seeks to indicate the general patterns, developments, and challenges of NHRAPs over the last three decades.

2. Theory and method

2.1. The general theory of human rights action planning

This study is based on the general theory of human rights action planning which will be briefly outlined here. This theory, advanced by this author elsewhere (Chalabi 2018), consists of four sub-theories:

1. Contextual sub-theory
2. Substantive sub-theory
3. Procedural sub-theory
4. Analytical sub-theory

The contextual theory of human rights planning explores the societal context through which human rights planning can work. This theory seeks to address the question as to what role economy, polity, culture, and community play in providing an appropriate societal context for developing and implementing an effective NHRAP? It is concerned with the general characteristics of the state, market, community, and culture as the underlying conditions of the success of planning in practice (ibid: 11–32).

The substantive theory of human rights planning provides the knowledge base to inform what the content of planning should be (For details see, ibid: 39–43). The procedural theory of human rights planning, as its name indicates, is about procedural principles to guide the process of planning in different phases from the preparation to the implementation, monitoring, and evaluation (ibid: 43–5). The analytical theory of human rights planning advanced through the positive critique of the Needs-based approach to human rights, the Interest theory of rights, and the Capability approach to human rights. This integrated theory, called 'NIC theory of rights',[1] provides a heuristic device for the analysis of rights in different phases of planning (ibid: 45–62).

In this study, this general theory is employed to formulate general criteria against which success in designing NHRAPs can be measured.

2.2. Longitudinal trend study design

The research method used in this study is outlined as follows: first, this research is based on a longitudinal retrospective trend study design to uncover the general patterns, differences, developments, and challenges of designing NHRAPs over the last three decades.[2] This longitudinal research covers a time period between 1994 (the development of the first NHRAP) and 2024. It is retrospective as it includes an analysis of those plans already developed in this period.

Second, the unit of analysis is NHRAPs (not countries). The sample size is 82 plans. These NHRAPs were selected based on their availability in English.[3] They come from different countries and developed at different points in time.

Third, the primary data collection is based on an extensive textual analysis of 82 NHRAPs developed between 1994 and 2024. To conduct this textual analysis, the texts of all these NHRAPs were coded and categorized using Statistical Package for the Social Sciences (SPSS).

Fourth, these 82 NHRAPs were probed against the 13 criteria extracted from the general theory of human rights action planning, briefly outlined above, and elaborated in Section 3. The link between NHRAPing and other relevant key topics such as sustainable development, climate change, the right to a clean, healthy and sustainable environment, and the Universal Periodic Review (UPR) is also briefly considered.

The next section will explore different dimensions of NHRAPing to set the criteria against which the design of these plans can be examined.

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1 NIC stands for Needs, Interests, and Capabilities.
2 Trend study as a type of longitudinal study involves tracking changes over time to identify key trends and explore the direction of changes. It is different from a panel study as another type of longitudinal study.
3 These countries include: Armenia, Azerbaijan, Australia, Bahrain, Belarus, Bolivia, Brazil, Cameroon, China, Croatia, Ecuador, Ethiopia, Finland, Gambia, Georgia, Germany, Greece, Indonesia, Iraq, Jordan, Kazakhstan, Kenya, Kosovo, Latvia, Lebanon, Liberia, Lithuania, Malawi, Mauritius, Mexico. Moldova, Mongolia, Morocco, Namibia, Nepal, Netherlands, New Zealand, Nigeria, Pakistan, Palestine, Philippines, Rwanda, Scotland (UK), Somalia, South Africa, Sri Lanka, St Helena (UK), Taiwan, Tanzania, Turkey, Turkmenistan, Tuvalu, and Ukraine. The second plan of New Zealand could not be found online and therefore was not included in this study.

3. Four dimensions of NHRAPing

As its name implies, National Human Rights Action Planning has four basic dimensions: (a) *national-ness*; (b) *human rights-ness*; (c) *action-ness*; and (d) *plan-ness*. If any of these dimensions was absent, it cannot be considered as a 'NHRAP'. These dimensions are so intertwined that judging one without taking the other into account is impossible. A plan with a comprehensive list of human rights, as set forth in international human rights documents, if not accompanied by 'actions' (activities, lead bodies, and time frame) becomes just words on the paper. Similarly, a well-designed set of activities without the human rights dimension, in this context, becomes nothing more than window dressing. This can be the case when plans are coloured by political ideologies of the states and not in harmony with universal human rights standards. Likewise, if all the activities identified, even if in line with human rights standards, belong to the past, then the document can hardly be considered as a 'plan'. The central thrust of this section is to proceed with proposing a set of general criteria, mostly derived from the general theory of human rights planning, as to each dimension of NHRAPing in order to provide not only a scale for measuring the degree of success in designing NHRAPs but also a guidance for developing, implementing, monitoring, and evaluating such plans in practice. It will start with the human rights-ness and will then explore action-ness, plan-ness, and national-ness respectively.

3.1. Human rights-ness

The human rights-ness dimension includes both substantive and procedural components which will be explored in this sub-section respectively.

3.1.1. Substance.

3.1.1.1. Alignment with international human rights principles.

For a plan to be a *human rights* action plan requires it to be guided by human rights principles as set forth in international human rights law (see the UN Handbook on National Human Rights Plan of Action 2002). Otherwise, it becomes, what I would call, a 'dissembling NHRAP' which can come under the broader category of 'sham NHRAPs' and can hardly be considered as a NHRAP as such. A key aspect of NHRAPs is that they do not have to be in alignment with national laws or policies but rather, they are meant to ensure the alignment of national laws and policies with international human rights standards.

3.1.1.2. Comprehensiveness.

Another substantive attribute of human rights-ness has to do with the scope or comprehensiveness of such plans. According to the substantive theory of human rights action planning, the core international human rights treaties,[4] at a minimum, need to be addressed in national human rights planning systematically. This list can be extended to other human rights treaties and declarations, such as the Declaration on the Rights of Indigenous Peoples and the International Convention on the Suppression and Punishment of the Crime of Apartheid and those set out in the International Labour Organisation or regional declarations. As each country's political, social, historical, economic, and cultural circumstances are different, there is no one-size-fits-all formula for the substance of NHRAPs. What is

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4   There are currently nine core human rights treaties. These include: International Covenant on Economic, Social, and Cultural Rights 1966 (ICESCR); International Covenant on Civil and Political Rights 1966 (ICCPR); International Convention on the Elimination of All Forms of Racial Discrimination (ICERD); Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment (CAT); Convention on the Rights of the Child (CRC); International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW); International Convention for the Protection of All Persons from Enforced Disappearance (CPED); Convention on the Rights of Persons with Disabilities (CRPD).

critical, however, is that all basic human rights, embodied in international human rights documents, should have an equal chance of being included in the plan, if recognized as a priority in the preparatory phase of planning. It means that all basic human rights, as set forth in core human rights conventions (at the minimum) must be taken into account when conducting a situation analysis, otherwise known as baseline study, before advancing the plan. The analytical theory of human rights action planning provides criteria for prioritization at this stage (for details see Chalabi 2018: 45–62).

3.1.2. Process.
A well-designed NHRAP is the result of a well-conducted process. This implies that the process of planning is as, if not more, important than the substance. As the UN General Assembly (2017: para 25) states, '… the quality of the process towards its development ultimately determines the political support for the plan, the recognition and buy-in by the public and civil society, as well as the effectiveness of the monitoring of its implementation'. According to the procedural theory of human rights action planning, at least four main principles, which are not dispensable, need to be employed in every human rights planning. These procedural principles include: (a) participation; (b) empowerment; (c) non-discrimination; and (d) accountability (Chalabi 2018: 43–5). Here I will focus on the first three and will discuss accountability later when exploring the lead bodies.

As highlighted in the procedural theory, participation is a categorical term for citizen power and varies in terms of (i) composition (participants); (ii) degree; and (iii) phases (see Gaventa 2006; VeneKlansen and Miller 2007). When it comes to the process of NHRAPing, the principles of non-discrimination and empowerment become subtly intertwined with the principle of participation. The principle of empowerment, in this context, has to do with the degree and phases of participation, and the principle of non-discrimination and inclusiveness is concerned with the composition of participants in different phases of planning.

In terms of composition, participation ranges from involving exclusively governmental organisations (state-centric planning) to other stakeholders, governmental, and non-governmental. This indicates the extent to which the process of planning is inclusive and non-discriminatory and is known as 'spaces for participation' in the literature (see Cornwall 2004; Gaventa 2006). In particular, a special attention should be paid to those who are deprived of basic human rights, or their rights are under threat, such as children, women, racial, linguistic, ethnic, and other minorities, persons with disabilities, elderly persons, refugees, asylum-seekers, and excluded groups (see Cornwall and Nyamu-Musembi 2004; Deneulin 2009; Hamm 2001: 1019).

In terms of degree, participation is much more than informing or consulting the people that the planned project is concerned with. It should be based on an active engagement of citizens as 'makers and shapers' rather than as 'users and choosers' of interventions (see, e.g. Chalabi 2018; Cornwall and Gaventa 2000; Gaventa and Cornwall 2006). This is where the empowerment principle comes in.

In terms of phases, participation ranges from involvement in only one phase, often preparatory phase, to all phases of planning namely preparatory phase, development phase, implementation phase, monitoring and evaluation phase (Chalabi 2015, 2018).

In short, the procedural theory of human rights action planning implies that the process of NHRAPing should be participatory and transparent from the preparatory phase all the way through to the evaluation phase, based on an acknowledgment of equal standing for all stakeholders.

3.2. Action-ness

The action-ness dimension of NHRAPing includes three components: (1) activities to move the plan ahead, (2) lead bodies to take responsibilities, and (3) timeframe to make the plan traceable.

3.2.1. *Specific activities.*

For a plan to be an 'action' plan requires to include concrete actions, sometimes referred to as 'activities' or 'tasks'. Otherwise, a plan without activities is like a car without wheels. I would call such plans 'legless plans' which can be considered as sham plans.

The degree of specificity of the activities identified is of critical importance. There is a three-step ladder of implementation: (a) goals; (b) objectives; and (c) tasks. At the topmost rung, 'goals' outline the fundamental long-term targets. In this context, giving effect to human rights as set forth in core human rights conventions (at the minimum) is the ultimate goal. The next down rung is concerned with 'objectives' which are more detailed than goals but not specific enough to bring about positive changes. They often clarify the areas necessary to achieve the goals. To put these objectives into practice requires specifying concrete actions (for details see Chalabi 2018: 104–5). Otherwise, NHRAPs remain at the stage of talking the talk than walking the walk.

Another key component of action-ness, which can often help specify actions, is timeframe.

3.2.2. *Timeframe.*

Each NHRAP should include both a timeframe for the plan as a whole and a timeframe for each of its individual activities. A plan without timeframe can become unattainable or at least un-trackable. Moreover, it would be almost impossible to measure the degree of accountability of the bodies involved.

3.2.3. *Lead bodies.*

As for the third component of action-ness, each NHRAP should clearly map out how responsibility to deliver activities is distributed among lead bodies. Otherwise, a plan without lead bodies becomes what can be called '*bona vacantia*' or 'ownerless plan'. Specification of lead bodies can enhance accountability as the key procedural principle upon which a NHRAP should be based (Chalabi 2015, 2018).

3.3. Plan-ness

For a plan to be a *plan,* it is required to be forward-looking. It also needs evidence to set the priorities and to design the plan. Moreover, the plan-ness dimension requires eyes to monitor the implementation and inheritance to learn for the future activities.

3.3.1. *Forward-looking.*

Those NHRAPs which only describe what happened or is already happening belong to the category of, what I would name 'still plans'. A still plan includes mainly past and/or current activities and can hardly be considered as a plan. This group of plans can also come under the broader category of sham NHRAPs.

3.3.2. *Baseline study.*

A baseline study is an analysis of the current human rights situation, based on empirical evidence, in the country concerned in order to identify human rights problems as well as financial and human resources and other opportunities available for realizing human rights (Chalabi 2015, 2018). Conducting a baseline study is an important requirement for advancing an effective NHRAP. A plan without any baseline study becomes, what I would call, a 'whack-a-mole plan'.

3.3.3. *Resources.*

Providing sufficient resources (human, financial, technical, organisational, natural, and informational) devoted exclusively to the activities identified in an action plan is an integral part of an effective NHRAP. A plan without resources is like a car without petrol.

3.3.4. *Assessment.*

Assessment includes both monitoring and evaluation. Monitoring takes place throughout the course of implementation as a means to determine what is and is not working well, so that adjustments can be made along the way. Monitoring can also enhance accountability and transparency throughout the implementation phase. A plan without monitoring mechanism would be a 'blind plan'.

Evaluation, as another form of assessment, examines the results of a plan at its completion. Evaluation mechanisms are meant to be not only backward-looking (was it a successful or unsuccessful plan, and to what extent.) but also forward-looking and process-oriented (what can we learn for the future.) (see Chalabi 2018; Wholey 2004). A plan without evaluation mechanism can result in 'non-hereditary plans' in the future.

The next sub-section is focussed on the national-ness as the last dimension of NHRAPing.

3.4. National-ness

The national-ness of NHRAPing has to do with three parameters: first, this dimension rules out human rights issues which stand at a higher level than national. This means that those plans which include only international activities such as New Zealand's 'International Human Rights Action Plan 2019-2023' or Estonia's '2021 Human Rights Diplomacy Action Plan' cannot be considered as a *National* human rights action plan. This has been hardly an issue in the plans studied in this research and therefore, I will shift my focus to the other two parameters as follows.

Second, this dimension implies context sensitivity. This is where the contextual theory of human rights action planning comes in (Chalabi 2018: 11–32). Although the contextual theory can act as a general guidance, it is not merely sufficient to deal with the specific context of the country concerned. To complement the general contextual theory requires conducting a top-down bottom-up situation analysis in the preparatory phase. A top-down situation analysis includes expert knowledge about the general economic, social, cultural, political, and historical inhibiting and enhancing factors in implementing human rights specific to the country concerned, whereas a bottom-up analysis involves detailed local knowledge of practitioners about concrete problems on the way of realizing human rights experienced in practice. These two can not only complement each other but also help develop special theories of human rights planning which include spatio-temporal factors of the national context of the country in question.[5]

Third, the national-ness also requires NHRAPs to take a nationally coordinated approach to human rights and rights-related bodies and activities domestically. As the UN General Assembly (2017: para 25) states, 'the development of a national human rights action plan is a national undertaking…. a national human rights action plan should link with and can reinforce national development plans, poverty reduction strategies and other sectorial plans. Thus, it provides for a unique platform for coordination and operational joint work for all national stakeholders'. NHRAPing is a common endeavour around which other sectors of society can be united for implementing human rights.

Having explored the four dimensions of NHRAPing, a set of general criteria can be put forward for the evaluation of designing such plans in this study. These criteria include: (i) being in alignment with international human rights principles; (ii) being comprehensive in scope; (iii) being participatory; (iv) encompassing specific activities; (v) including

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5   To avoid confusion, I need to emphasize that here 'context' or 'societal context' has been employed in two senses. When I discuss contextual theory of planning as part of a general theory of human rights action planning, the term 'context' is used at the high level of abstraction, free from any spatio-temporal factor. When I refer to special theories of planning at the lower level of abstract, 'context' is used as what is bounded by spatio-temporal factors and stands at the heart of a special theory of planning. The latter needs to be developed for each country specifically and in accordance with their political, social, cultural, economic, and historical factors. For more details see (Chalabi 2018).

timeframe; (vi) incorporating lead bodies; (vii) being forward-looking; (viii) building upon an evidence-based baseline study; (ix) allocating resources; (x) including monitoring mechanism; (xi) including evaluation mechanism; (xii) being context-sensitive; and (xiii) taking a nationally coordinated approach.

   Using these criteria, a comprehensive longitudinal study of 82 NHRAPs was conducted. The results of this empirical study will be presented in the next section.

4. Empirical findings

This section presents the empirical findings of an extensive textual analysis of all those NHRAPs, released between 1994 and 2024 and available in English, in order to indicate the general trends, challenges, and developments in designing such plans in practice.

4.1. Human rights-ness

4.1.1. *Substance.*

This study found ample variations among NHRAPs in terms of substance and the degree of comprehensiveness, the details of which will be presented below.

4.1.1.1. Alignment with international human rights principles.

In terms of alignment with international human rights standards, two key patterns were identified through the textual analysis conducted in this research:

   First, a minority of NHRAPs studied, are, to greater or lesser extent, guided by traditional values, and political or religious ideologies of the state, which are not in line with universal human rights standards. The NHRAP of China (2016–2020), as an instance, states that:

> [T]he guiding ideology for formulating and implementing the Action Plan [is based on] upholding socialism with Chinese characteristics, fully implementing the guiding principles of the […] National Congress of the Communist Party of China […], following the guidance of Marxism-Leninism, Mao Zedong Thought, Deng Xiaoping Theory, the important thought of the Three Represents, and the Scientific Outlook on Development, implementing the spirit of a series of important speeches made by General Secretary Xi Jinping.

China repeats it again in its fourth NHRAP (2021–2025: 4) that 'the guidelines for formulating and implementing the Action Plan are: Following the guidance of Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era…'.

   Second, a group of NHRAPs seems to be partially in line with universal human rights standards. These plans are often conditioned on being aligned with the constitution of the country concerned even though the latter may not be necessarily in line with universal human rights standards. Examples include the NHRAP of Belarus, Cameroon, Gambia, Pakistan, and the second NHRAP of Azerbaijan. The NHRAP of Gambia, for example, states that the plan is based on the 1997 constitution of Gambia and then later it acknowledges (2021–2025: 36) that 'Section 33 of the Constitution allows discrimination in matters related to personal law. Another general limitation on the exercise of these rights in the Constitution and other laws is the declaration of a state of emergency under section 34 of the Constitution'.

   Some of these plans look more like dissembling plans which, as discussed above, can hardly be considered as a NHRAP. This problem perhaps can be explained by the fact that some states adopted the traditional model of planning which is state-centric, technocratic, and top-down. Traditional planning, as a theoretically baseless model, is like an empty box which confers power upon the states to fill it up with their own political ideologies (Chalabi 2015, 2016). This model of planning allows the states latitude in manoeuvring for window

dressing rather than the realization of human rights as set forth in international human rights law (for detail on the concepts of planning see Chalabi 2014, 2015, 2018).

4.1.1.2. *Comprehensiveness.*

According to this research, 79.3 per cent (65 out of 82) of the plans studied were, to a greater or lesser degree, comprehensive in their coverage of basic human rights, and 20.7 per cent (17 out of 82) were not. Examples of the latter group include the NHRAPs of Bolivia (1999), Brazil (1996), Azerbaijan (2012–2015), Finland (2020–2023), Georgia (2016–2017), Kosovo (2009–2011), Mexico (1998), and Malawi (1995–1996).

In general, five main patterns can be driven by the data mining undertaken. First, some NHRAPs studied have clearly ruled out a group of basic human rights focussing on either civil and political rights or economic, social, and cultural rights solely. For example, the first NHRAP of Turkey (2014–2019) is limited to civil and political rights with no or very limited reference to socio-economic rights. This plan was mainly focussed on the implementation of European Court of Human Rights decisions. Similarly, the NHRAP of Pakistan (2016) has excluded socio-economic rights.

Second, similar to the previous group but in a different way, a minority group of plans have taken a too narrow focus on the scope of NHRAPs. The 1995 NHRAP of Latvia is an example which includes only one core action, that is, establishing a national human rights institution. Such narrow focus makes it hard to consider these plans a NHRAP as recommended in the Vienna Declaration, even though they might be well-designed for their narrow purpose.

Third, given time and resource constraints, prioritization is inevitable in NHRAPing. Yet, the lack of prioritization is still a common trend among current plans. This can be explained, among others, by the lack of political will and the lack of any evidence-based situation analysis (baseline study). The 14-page NHRAP of the Republic of Azerbaijan, for instance, includes some vague and irrelevant measures such as: 'Strengthening the rights of entrepreneurs and consumers' or 'Increasing the effectiveness of the measures in the field of ensuring the right to peaceful enjoyment of property'. Out of 14 pages, around four pages are allocated to 'Protection of rights of various population groups'. One of them, for example, is about 'preparation of TV programs on educating and enlightening the children, as well as study the possibility of establishing a children's Television'. Similar problem can be seen in the 20-page NHRAP of Latvia. The NHRAP of Jordan (2016–2025: 21), as another example, includes an activity about issuing 'the law for the protection of the Arabic language due to the importance and role of this law in safeguarding the Arabic identity'.

Likewise, there is a group of plans that have set out priorities without explicating where they are coming from. The Scotland human rights action plan (2013–2017) offers an example here. It is not clear enough where the plan's priorities come from. In contrast, the second NHRAP of Scotland (2023: 42) has clearly set out priorities based on an evidenced-based situation analysis.

Fourth, a group of plans such as the second NHRAPs of Croatia, Philippines (2010-2014), and the Netherlands as well as the first plans of Bolivia and Palestine have taken a thematic approach as a way of prioritization. For example, the second NHRAP of the Netherlands is based on one core theme of 'access to services', which was chosen, according to the plan, in consultation with civil society organisations. Similarly, the first NHRAPs of Bolivia is based on 'five thematic headings'. These include: (1) respect, defence, and promotion of human rights; (2) civic education; (3) strengthening of institutions; (4) legislative reform; and (5) strengthening of civil society. Whereas the Dutch NHRAP has properly detailed its core theme into activities, the Bolivian plan, with only 14-page length, failed to deal with them in depth.

Fifth, a group of plans, such as the NHRAP of Belarus (2016–2019), New Zealand (2005–2010), Lebanon (2014–2019), Nigeria (2009–2013), the second NHRAP of Croatia

(2013–2016) and Iraq (2021–2025), and the third NHRAP of Australia (2012), are developed to address UPR's recommendations and/or recommendations made by human rights treaties. This group of plans can be divided into two sub-groups. The first one includes those which are exclusively based on the recommendations of regional or international bodies made in advance from the top-down. These plans are technically a 'recommendations implementation plan' which follow-up on the recommendations already made with no or limited feedback from the bottom up (see Lorion 2022). As the UN Secretary General in its report (2017: para 30) states:

> Recommendation implementation plans are […] fundamentally different from national human rights action plans in terms of process, coverage (such plans focus on and contain only human rights mechanism recommendations), flexibility, timespan and format. The development of recommendation implementation plans could include some sort of consultations with stakeholders, in particular, civil society organisations, but ultimately, the scope of such consultations will not mirror the scope of those on the development of the national human rights action plans.

This group of plans have underestimated the participatory nature of these plans which stands at the heart of NHRAPing. Some countries, such as Nepal, however, have developed both types of plans separately and systematically: NHRAPs and recommendation implementation plans.

The second sub-group includes those NHRAPs which consider regional and international recommendations, more commonly UPR's recommendations, as one entry point among others. For example, the second NHRAP of Croatia gave 'special consideration' to UPR's recommendations but the plan is based on an independent situation analysis and evaluation of the previous plan. In this case, UPR is considered as only one source among other sources. This can be a positive practice as one of the strengths of the UPR, for example, is that the standard for the measurement of a state human rights performance involves a full range of human rights, no matter whether the state has ratified the relevant treaty or not. This can be important, given the relatively low rate of treaty ratification in some cases (Baird 2015: 207). On the other hand, grounding a NHRAP merely on UPR's recommendations may have some significant limitations. First, it is totally left up to the states to accept recommendations made at UPR. Second, 'due to the game of tit-for-tat, there sometimes (if not often) exists an unwritten agreement among the states to save each other's international image' (Chalabi 2018: 129). Hence, issues raised at UPR are not always comprehensive and factual enough (see Bulto 2015). Third, issues raised during the UPR are often focussed on legal limitations underestimating the social and cultural factors which are as, if not more, important as legal factors (Baird 2015: 208). Fourth, non-governmental organisations (NGOs) often do not have the necessary resources to engage in lobbying other states in Geneva before and during the interactive dialogue and may not appear as effective as they are expected to be (ibid: 209).

Having briefly discussed the substantive component of human rights-ness, the next sub-section explores the procedural component of this dimension. Before proceeding further, however, let me pause to highlight a few innovative approaches taken substantively in some NHRAPs. A relatively new trend in NHRAPing is to link human rights and sustainable development in particular the UN Sustainable development goals (SDGs). This link can be seen in plans such as the third NHRAP of Philippines (2018–2020), the second plans of the Netherlands (2020) and Turkmenistan (2021–2025), and the fourth plan of China (2021–2025) some of which have a section on 'sustainable development goals'. For example, the NHRAP of Turkmenistan (2021–2025) is strongly linked to UN Development Goals with identifying SDGs indicators for each activity. This plan (2021–2025: 35), likewise, adopts the human rights-based approach, 'which is an integral part

of the formulation, implementation, monitoring and evaluation of national development policies and programmes'.

Moreover, some good efforts have been made by some countries to protect the right to a healthy and sustainable environment in their NHRAPs. Examples include the NHRAPs of Armenia (2020), Ethiopia (2016–2020), Cameron (2015–2019), Finland (2012–2013 and 2017–2019), South Africa (1998), and Gambia (2021–2025). In recent years, climate change and its impact on environment have also included in some NHRAPs, such as the NHRAPs of Bahrain (2022–2026), Greece (2014–2016), Iraq (2021–2025), Kenya (2014), Morocco (2018–2021), Nepal (2014–2018) and Taiwan (2022–2024).

4.1.2. Process.

As discussed, the participation principle is of critical importance in NHRAPing. Despite significant progress and widespread use of 'participatory approach' in planning, some NHRAPs studied are mostly rhetorical. While some plans are developed in a very transparent process, such as both Scottish NHRAPs and the first NHRAP of Sri Lanka in which the names of those involved are included, some include no information on how they had been developed. A single-voiced plan can easily exclude the most important human rights issues of the country concerned. For example, whereas the first two NHRAPs of Armenia (2014-2016, 2017-2019) did not adequately address some key human rights issues in the country such as discrimination against people with disabilities, and violence and discrimination based on sexual orientation and gender identity (Human Rights Watch 2024), the fourth NHRAP of Armenia (2023–2025) has been significantly improved.

Surprisingly, even though Jordan has a national human rights institution, called the National Centre for Human Rights, it did not play a part in developing their NHRAP. Instead, the plan (2017–2025:7) only mentions that a drafting committee is formed 'to examine the recommendations of the National Centre for Human Rights'. It is not clear why the centre has not been involved directly. On a positive side, the first NHRAP of New Zealand was developed based on 'the first comprehensive assessment of the status of human rights in New Zealand, and the contributions of over 5,000 individuals, groups and organisations who made submissions and participated in nationwide consultations and in the extensive public opinion research'. Similarly, when preparing the third NHRAP, the Australian government 'for the first time, conducted a Baseline Study on the key human rights issues in Australia'. According to the plan (2012: 5), '… the Government initiated Australia's first and most comprehensive community consultation on human rights. More than 35,000 submissions were made and more than 6,000 people participated in community roundtables, making it an unprecedented open consultation between the Australian Government and the general public'. These examples indicate an indirect impact of NHRAPing on public participation and awareness on human rights issues.

In terms of degree, a common trend, identified across those plans, which are not single-voiced, is that participation often comes in the form of consultation which is a weak form of participation. As Fig. 1 indicates, 32 (out of 82) or 39 per cent of NHRAPs developed in a non-participatory process.

The research findings show that 50 out of 82 (60.9 per cent) NHRAPs have developed in a participatory way and 32 NHRAPs were identified as non-participatory. Participation in 29 out of these 50 NHRAPs was in the form of consultation. Twenty-one out of these 50 NHRAPs came in the form of engagement which goes beyond consultation and gets stakeholders more genuinely involved in decision making. A good example here is Taiwan's NHRAP which was not limited to consultation but rather a meaningful participation in all phases of planning.

In terms of phases of planning, this research shows that participation, mostly in the form of consultation, is often undertaken only in the preparatory phase (Fig. 1). Out of 29 NHRAPs, which were identified as participatory in the form of consultation, 26, 9, 12, and

2 plans had some form of consultation in the preparatory phase, implementation phase, monitoring phase, and evaluation phase, respectively (Fig. 1). These numbers indicate that some plans had consultation in more than one phase of planning. As Fig. 1 illustrates, participation in the form of engagement, which goes beyond consultation, is spread more evenly among different phases of planning. Out of 21 NHRAPs, which were identified as participatory in the form of engagement, 20, 16, 13, and 9 plans had some form of meaningful engagement in the preparatory phase, implementation phase, monitoring phase, and evaluation phase respectively.

Having shown the general trend of NHRAPing as for the first dimension, the next section will explore the second dimension, action-ness, in practice.

4.2. Action-ness

4.2.1. *Specific activities.*

Out of 82 NHRAPs studied, only 41 (50 per cent) plans had identified specific activities; 7.3 per cent (6 out of 82) plans did not include any activities, and the activities included in 35 plans (42.7 per cent) were not specific enough. For instance, the first NHRAPs of the Netherlands (2014), Australia (1994), Indonesia (1998–2003), Kenya (2014), Malawi (1995–1996), and Mexico (1998) did not include any activity.

Instead of identifying actions, some governments use these plans, partly or in full, to praise themselves. For example, the eighth NHRAP of Germany has limited specific and new activities. Instead, they either restate what has been already done or use the plan to praise their human rights performance. Under the subtitle 'Championing freedom of the media and freedom of opinion', it (2021–2022: 29) states that 'the German Government works around the world to promote freedom of opinion, freedom of expression and access to information as inalienable human rights that form the bedrock of a free and democratic society. …'. It includes similar sections such as 'Championing freedom of religion or belief'.

A common issue across many NHRAPs is that the measures identified are not specific enough and stand mostly at the 'objectives' level than activities. For example, the
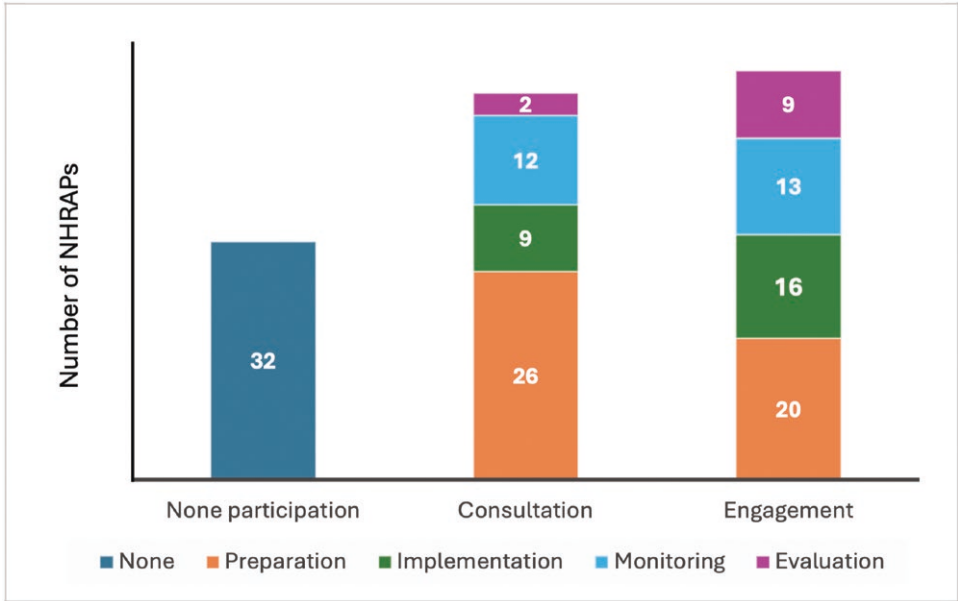

Figure 1. Degree of participation in different phases of NHRAPing: 1994–2024.

second NHRAP of Azerbaijan (2012–2015) includes some broad measures which look more like objectives, such as 'Implementation of the commitments and obligations arising from the international treaties on human rights and freedoms to which the Republic of Azerbaijan is a signatory and ensuring compliance of regulatory and legal acts of the Republic of Azerbaijan with international legal instruments'. Similarly, in the second plan of Turkmenistan (2021–2025: 53), some activities are just vague and broad such as 'further development of social policies, specifically in the field of economic, social and cultural rights, in order to maximize the quality of life of the population' and 'adopting and implementing effective measures to eliminate and prevent violations of economic, social and cultural rights'. Another example includes the 1998 NHRAP of Ecuador.

On a positive side, the first and third NHRAP of Nepal outlined not only the three levels of, what they called, 'objectives', 'program', and 'activities', but also 'helping bodies', 'duration for implementation', 'indicators', and 'risk factors'. Likewise, a positive element of the 2015–2019 NHRAP of Cameroon is to include 'expected outputs by activities' for almost all the activities identified in the plan.

4.2.2. Timeframe.

As our findings show, still, 48.8 per cent of plans studied (40 plans out of 82) have not included any time frame for their activities. Examples include the NHRAPs of Kosovo (2009–2011), Kenya (2014), Iraq (2021–2025), Ethiopia (2013–2015), and Ecuador (1998).

4.2.3. Lead bodies.

The results of this research indicate that 69.5 per cent (57 out of 82) of the NHRAPs have identified lead bodies and 25 plans (30.5 per cent) have not (Fig. 2). Examples of the latter group include the 2012 NHRAP of Australia, 2010–2018 NHRAP of Philippine, the first
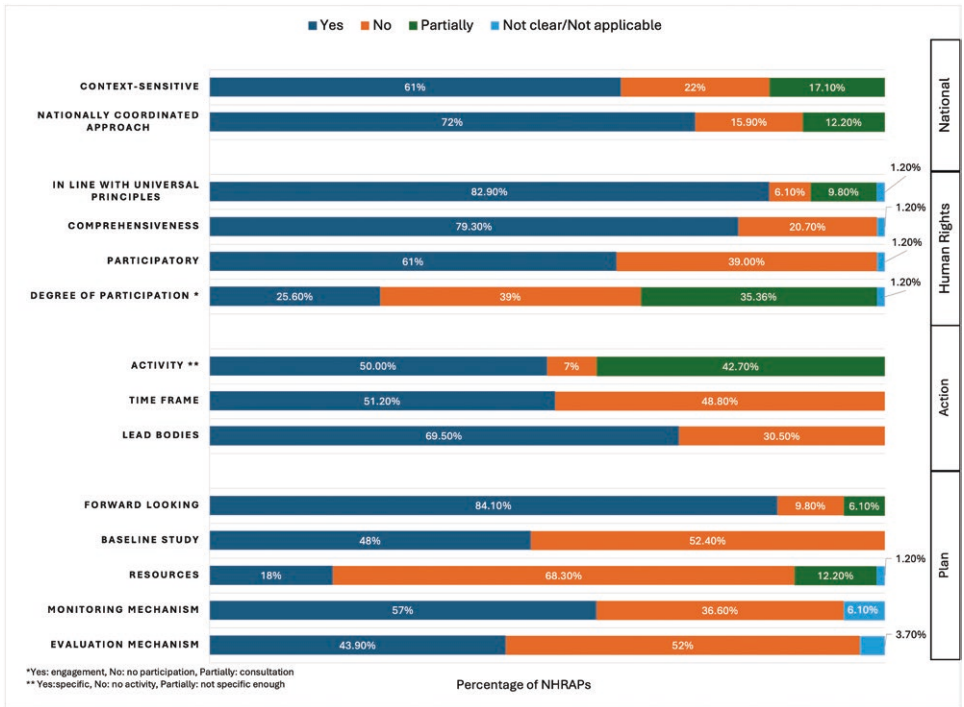

Figure 2. An overview of key dimensions of NHRAPing: 1994–2024.

three NHRAPs of Armenia,[6] the 1998 NHRAP of South Africa, and 2013–2016 NHRAP of Croatia.

As empirical evidence indicates, 'only 68% of the NHRAPs attribute each action to actors in charge of implementing them' (Lorion 2022: 45). Some plans include no or very general reference to lead bodies. For example, most actions in Chinese and German plans are attributed vaguely to the whole government as 'China will do X' or 'the Federal Government will do X'. On a positive side, some NHRAPs specified not only lead bodies but also accountability indicators. The first two NHRAPs of Finland, as well-designed plans, allocate not only 'responsible ministry' for each action (project) but also include: (a) the name of the project; (b) a description of its key contents; (c) the legal basis or the fundamental or human rights provision to whose implementation the project is relevant; (d) the ministry/ministries responsible for the project and the key interest groups, and (e) indicators to be used to evaluate the implementation of each individual project. The 2012–2014 NHRAP of Iraq, as another example, includes three types of actors, the 'study, proposition and follow-up body', the 'decision making body', and the 'executive body' for each action.

A few plans, such as the fourth NHRAP of Nepal, however, have gone too much on the other direction and allocated multiple lead bodies to the same action. This can sometimes undermine accountability and result in what is known as the 'multiple accountabilities disorder' (see Koppell 2015). To avoid this problem, the NHRAP of Liberia (2019–2024) highlighted the main responsible out of multiple lead bodies assigned.

4.3. Plan-ness

4.3.1. *Forward-looking.*

Of the plans studied in this research, 9.8 per cent (8 out of 82) were not future-oriented; 6.1 per cent (5 out of 82) plans were partially future-oriented and 84.1 per cent (69 out of 82) of plans were future-oriented. For example, the first two NHRAPs of Armenia were mostly based on ongoing activities or what had been done. The outcomes, identified in these plans, had already been achieved and that is why for most activities, the plans state that 'no financing is required'. This issue, however, was addressed in the third and fourth NHRAPs of Armenia. The first NHRAP of Kosovo, as another example, hardly includes any new activity and only repeats what has been already done most of which are at the objective level. Other similar cases include, among others, the first NHRAP of the Netherlands and the second NHRAP of Azerbaijan. As the findings show, all the 'still NHRAPs' identified in this study lack any timeframe, lead bodies, specific activities as well as any monitoring or evaluation mechanisms.

Another issue, identified in this research, was that some activities, included in the current plans, belong to the preparatory phase of planning which comes before the development phase. The 27-page NHRAP of Jordan, for example, employs 'to review' or 'conduct a review' 21 times.

In order to identify future-oriented activities requires conducting a baseline study which will be discussed in the following sub-section.

4.3.2. **Baseline study.**

The preparatory phase of NHRAPing comes in different forms. Some countries, such as Liberia, begin with the establishment of a NHRAP Steering Committee. In this case, the Committee consists of four sub-committees (i.e. the Human Rights Reporting subcommittee, the Drafting subcommittee, the Data Collection subcommittee, and the Public Awareness subcommittee). In some cases, such as Scotland, Philippines, and New Zealand, the plans were developed by human rights commissions or they had a central role in advancing such plans, while in some other cases, such as Jordan, China, and Turkey, the

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6   The fourth NHRAP of Armenia (2023–2025) has identified 'responsible authority' for each action.

state is in full charge of developing NHRAPs. The key element of preparatory phase, in any form, is baseline study. Our findings show that 47.6 per cent (39 out of 82) of the plans studied are based on a situation analysis; 52.4 per cent (43 out of 82) have not built upon any baseline study.

Conducting baseline studies in some cases has remained at the rhetorical level. For example, Jordan's action plan in its preamble holds that 'this plan was prepared after an in-depth study of the situation of human rights in the Kingdom, in order to address the existing deficiencies at the level of the legislations, policies and practices for promoting the situation of human rights and upgrading them in line with the national constants and the Kingdom's constitution and according to the Kingdom's commitment in this respect'. Then, later it (2016–2025: 4) clarifies that 'an in-depth study of the situation' included only studying 'a number of references and literatures' which can hardly be considered as a baseline study.

On a positive side, Finland in its second plan has conducted a SWOT(**strengths, weaknesses, opportunities, and threats**) analysis for each theme which includes Strengths, Weaknesses, Opportunities, and Threats. This is a comprehensive analysis which provides a full picture of the situation of the rights concerned.

4.3.3. Resources.

As Fig. 2 shows, only 18.3 per cent (15 out of 82) of the plans have included resources. This can be divided into two groups. A group of plans has provided resources for each action systematically such as NHRAPs of Somalia (2015–2016), Cameroon (2015–2019), Armenia (2023–2025), and Tanzania (2013–2017). A group of NHRAPs includes either an overall budget for the plan as a whole or budget for some actions in an unsystematic way such as the NHRAPs of Greece (2014–2016); Liberia (2019–2024), Moldova (2018–2022), and Georgia (2016–2017). About 12.2 per cent (10 out of 82) of plans includes the source of funding instead of the budget such as the first three NHRAPs of Armenia, and the first two NHRAPs of Nigeria; 56 per cent of NHRAPs studied have not included any budget for the actions identified such as the NHRAPs of Brazil (1996), Kazakhstan (2009–2012), Australia (1994), and Azerbaijan (2012–2015).

In practice, the United Nations, mostly the UN Office of the High Commissioner for Human Rights and the UN Development Programme, have supported many countries with providing recourses of different types. For example, throughout the development process of the first NHRAP of Liberia, the Human Rights and Protection Section (HRPS) of the United Nations Mission in Liberia provided technical support and advice (NHRAP of Liberia, 2013–2018: 2). Financial support was also provided through the HRPS with funds from the Swiss Agency for Development and Cooperation and the Office of the High Commissioner for Human Rights (ibid).

4.3.4. Assessment.

Of the NHRAPs studied, 57.3 per cent (47 out of 82) included some form of monitoring mechanism, whereas 36.6 per cent (30 out of 82) did not include any monitoring mechanisms, and 6.1 per cent (five plans) remained unclear in their text. The first NHRAP of Liberia, for example, includes a community-based monitoring. The second NHRAP of Finland, as another example, includes independent supervisory authorities, such as the special ombudsmen, the Human Rights Centre, and the Human Rights Delegation as well as NGOs.

As this research indicates, 52.4 per cent (43 out of 82) of the plans have not included any evaluation mechanisms, 36 (43.9 per cent) have included and 3 (3.7 per cent) plans are not clear (Fig. 2). For example, the first NHRAP of Sri Lanka did not include any evaluation mechanism and therefore, in its second plan, some overlaps with the first one were found to the extent that in some areas such as women's rights the same activities have been repeated with no link or update on what has happened and why it is needed to be repeated. The first

NHRAP of Finland included a neutral third-party evaluation of the plan which was meant to look into the drafting of the plan as a process, the plan as a whole, and the individual projects and their impacts. They (2012–2013:9) also aimed to develop human rights indicators to be utilized in the evaluation of the action plan.

4.4. National-ness

4.4.1. Context sensitivity.

Context sensitivity is a key parameter of the national-ness element. According to this research, 61 per cent of the plans studied were context-sensitive, 17.1 per cent were partially context-dependent, and 22 per cent were not context-sensitive.

A group of NHRAPs, especially from the global south, such as Ethiopia, Gambia, and Kenya, have emphasized on the cultural and social barriers in implementing human rights. A positive case here is the first NHRAP of Ethiopia. This evidence-based plan has a section on 'Human Rights in Ethiopia' where it acknowledges the impact of the unrelenting oppression of anti-democratic and despotic rulers as well as harmful traditional practices on realizing people's rights in Ethiopia. More importantly, for each right, the Ethiopian NHRAP specifies problems and challenges of different types (i.e. social, cultural, political, and economic), and then for each challenge, one or more actions have been suggested.

The Gambia's plan (2021–2025), as another example, highlights some key social and cultural barriers in implementing human rights in the country, such as the caste system 'which is a long-standing traditional practice that subject persons perceived as "slaves" to tedious, and sometimes degrading, jobs for their "masters" or "nobles"'.

On the other hand, the status of economy (e.g. market or development), culture, community, and polity have remained unclear in some NHRAPs such as the first NHRAP of Malawi where the link between human rights and societal context in which the plan has developed is totally lost. The NHRAPs of Latvia, as another example, is mostly out of context describing international law on different rights with no or little link to the actual context of Latvia.

4.4.2. Nationally coordinated.

Being nationally coordinated is another component of national-ness. This textual analysis indicates that 72 per cent of the plans took a nationally coordinated approach, 15.9 per cent did not mention any coordinating role for their plans, and 12.2 per cent were taken a partially coordinated approach. A good example here is the second NHRAP of Scotland which has an appendix on 'national context'. It states (2023: 72) that:

> In Scotland, there is a developing body of national, regional and sectoral policy and practice aimed at addressing human rights issues. However, this can be disjointed and work in silos. SNAP 2 is different – it is a coordinated and cross-sectoral approach to human rights activity. For example, in this one plan there are actions that address a diverse range of policy issues like health, the environment, education, work, housing, social care, public finance, women's rights, and justice, to name just a few.

Tanzania's plan, as another example, holds (2013–2017: 7–8) that 'the NHRAP should not be looked at as an isolated action plan separate from other national development processes'. During the process of advancing the NHRAP, the Tanzanian Coordination Committee took into account national development goals, policy objectives, programs, and specific interventions that directly or indirectly related to human rights such as the Tanzania Development Vision 2025 and the National Strategy for Growth and Reduction of Poverty.

Figure 2 recapitulates the empirical findings of this study. It is an overview of the four dimensions of NHRAPing and their components between 1994 and 2024. Uncovering these components can be the first step in constructing a composite index for NHRAPing

which is needed not only for measuring the degree of success in designing NHRAPs but also for implementing, monitoring, and evaluating such plans in practice.[7]

As this Figure indicates, the least problematic dimension is national-ness and the most common problem across the NHRAPs studied goes back to the lack of allocating resources to activities identified in the plans. The most notable issue identified in this research, however, is concerned with 'sham NHRAPs'. More specifically, three groups of NHRAPs, spotted in this research, come under the category of sham plans which means that they can hardly be considered as a NHRAP: dissembling plans, legless plans, and still plans.

5. Conclusion

NHRAPs, as recommended in the Vienna Declaration and Programme of Action, have developed dramatically over the last 30 years. Yet, despite significant developments, there are as yet no universal standards or criteria for guidance and evaluation of NHRAPs in practice. Drawing upon the general theory of human rights action planning, this study put forwarded 13 general criteria which can be employed not only for measuring the degree of success in designing such plans but also as guidance for preparing, developing, implementing, monitoring, and evaluating NHRAPs. Using these 13 criteria as the major components of the four dimensions of NHRAPing, an extensive longitudinal study of 82 NHRAPs was conducted in order to uncover the general patterns, differences, developments, and challenges in designing NHRAPs over the last three decades.

As our findings indicate, countries have adopted different approaches in the process, form, and substance of NHRAPs. In terms of consistency in NHRAPing, whereas some countries have developed only one plan, some countries such as Bolivia, China, and Thailand have developed four, and Indonesia, Mexico, and Nepal have released five NHRAPs. Germany stands out as a country with the highest number of these plans. This country has released nine NHRAPs since 2005. This study indicates that most countries have become persistent and progressive over time, though some have stayed still or even become regressive. For example, the Armenian, Scottish, Dutch, Iraqi, Ethiopian, Kosovars, Nigerian, Nepali, and Malawian plans have improved over time, whereas the Chinese and German plans[8] stayed still with little or no improvement.

This study also found that the most common problem has to do with the lack of allocating resources to the activities identified in the plans. Another common problem is concerned with the degree of participation which remains mostly at the consultation level rather than genuine engagement in decision making. A group of NHRAPs have also failed to conduct an evidence-based situation analysis to inform their content. Lack of accountability mechanism, time frame, or any monitoring and evaluation mechanism are other issues spotted across NHRAPs. Another difficulty, which seems to be common in designing NHRAPs, has to do with the specificity of the actions identified. Apart from the fact that some plans did not encompass any actions as such, a bigger group of NHRAPs have failed to sufficiently specify any concrete actions to move the plans forward and therefore, what they labelled as 'actions' appear to be more like objectives.

In terms of importance, the most notable issue, identified in this research, is concerned with the category of 'sham NHRAPs', which can hardly be considered as a NHRAP. More specifically, three small groups of NHRAPs, spotted in this research, fall under this category. The first group, 'dissembling NHRAPs', includes a small number of plans which are not in line with the universal human rights principles and often coloured by the ideology of the state. The second sub-category, 'still NHRAPs', encompasses those plans which are not

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7   Such composite index needs to be constructed as a separate project and calibrated based on theoretical knowledge, expert knowledge, and practitioners' experience in NHRAPing.

8   Only two (out of nine) German NHRAPs (2021–2022) and (2023–2024), were available in English and, therefore, included in this study.

future-oriented. The final group of sham plans, 'legless NHRAPs', consists of a few numbers of plans which did not identify any action.

Despite these challenges, this study has shown an increase in number, pace, and quality of advancing NHRAPs over time. Notable efforts have been made by some countries such as Finland (in its first two NHRAPs) and Nepal (in its fourth NHRAP) to design their plans in a participatory process based on empirical evidence collected in their baseline study. There are also exemplary cases such as the NHRAPs of Greece (2014–2016), Croatia (2013–2016), and Scotland (2023–2030) where NHRAPs are well-designed to mobilize a wide range of people, organisations, and resources in support of human rights and to ensure policy consistency in human rights-related areas. It is very promising that some recent plans have made clear links between human rights planning and sustainable development particularly the UN SDGs. The Taiwan's NHRAP, as a well-designed plan, for example, is based on a rights-based approach to sustainable development. Furthermore, there is a growing number of NHRAPs in which the right to a healthy and sustainable environment and the impact of climate change on basic human rights are embodied. This is becoming a new trend in NHRAPing. All these achievements along with the fact that NHRAPs are spread almost evenly across all regions around the globe are evidence of the fact that these plans are becoming an inevitable element of domestic human rights systems.

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