The U.S. International Council on Disabilities (USICD) welcomes the opportunity to participate in consultations on the World Bank Environmental and Social Framework (ESF). Several of its Board Members have taken part on consultations and USICD continues to follow the process with keen interest.

One of the main pillars of USICD’s work on international disability issues is ensuring that people with disabilities are recognized as participants in and beneficiaries of international development and poverty eradication programming because the vast majority of the one billion people with disabilities around the world live in poverty. USICD accordingly welcomes the work of the World Bank in this area, most notably through the Bank’s Global Disability Adviser and the efforts underway to ensure disability inclusion in the ESF. In particular, USICD endorses the recognition in the ESF that inclusive development requires empowering all people – including persons with disabilities - to participate in, and benefit from, the development process and that the removal of barriers against those who are often excluded from the development process is part and parcel of this effort.

USICD welcomes the language included in Draft 2 of the ESF, in particular the inclusion of persons with disabilities in the referencing of groups subject to disadvantage and discrimination (e.g., WB ES Policy, para. 4(b) fn. 11; ESS 1, para. 26(b), fn. 22). We reaffirm the importance of ensuring explicit reference to disability inclusion in the final iteration of the ESF and offer the following recommendations directed at clarifying and in one or two instances correcting language in the current draft to ensure alignment with international standards on disability:

**Suggested Revisions to ESP:**

**Insert specific reference to persons with disabilities:** The addition of the term “persons with disabilities” in para. 3 of the ESP is recommended, in recognition of the fact that persons with disabilities constitute some 1 billion persons and thus warrants separate and specific reference in the Policy narrative itself. (See suggested language below).

**Include reference to “accessibility” as a goal:** The ESF does make some reference to accessibility but it bears mention in the ESP narrative, together with the references already made to transparency and accountability. Accessibility is a separate and distinct concept warranting explicit reference in the ESP and applies, not only to persons with disabilities, but to other groups who experience barriers in accessing development processes and benefits.

ESP, para. 3: “It also embraces action, including by strengthening transparency, accountability and accessibility, to remove barriers against those who are often excluded from the development process, such as women, children, youth, persons with disabilities and minorities, and to ensure that the voice of all can be heard.”
United States International Council on Disabilities

Make explicit reference to “disability equality” in the affirmation of the Bank’s commitment to environmental and social sustainability: USICD welcomes the reaffirmation of the Bank’s commitment to environmental and social sustainability in the ESP at para. 4. Given the disproportionate impact of poverty on persons with disabilities and that disability equality is a major precondition to poverty alleviation globally, USICD recommends the inclusion of “disability equality” as follows:

ESP, para. 4: The World Bank uses its convening ability, financial instruments, and intellectual resources to embed this commitment to environmental and social sustainability across all its activities, which range from the Bank’s global engagement in issues such as climate change, disaster risk management, and gender and disability equality, to ensuring that environmental and social considerations are reflected in all sector strategies, operational policies, and country dialogues.

Suggested Revisions to ESS 1-10:

Clarify terminology describing principles of accessibility and universal design: In ESS 4, Health and Safety, Para. 7, USICD welcomes the inclusion of the important principle of universal access in the context of the design and construction of new building and structures. As defined in footnote 4, however, the concept is at odds with accepted terminology and the definitions of accessibility and universal design. Amendment would ensure alignment with international standards and conceptual clarity.

ESS 4, para. 7: Due attention will be given to universal design and accessibility to ensure that the design and construction of new building and structures is usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.

ESS 4, para. 7, ftn. 4: “Universal design” refers to the usability of buildings and structures by all people, the greatest extent possible, without the need for adaptation or specialized design. “Accessibility” refers to the identification and elimination of obstacles and barriers to ensure access to the physical environment, to transportation, to information and communications, and to other facilities and services.

Glossary – The term “universal access” should be amended for the reasons set out above. The term “barrier free access” should be added, in line with the definition provided above.

Accessibility in the context of grievance mechanisms: USICD welcomes the inclusion of detailed provisions on grievance redress and accountability and, in particular, the emphasis on access to grievance mechanisms to project-affected parties. Given the significant barriers that persons with disabilities often face in accessing justice mechanisms, USICD recommends, at a minimum, explicit reference to accessibility to ensure that these mechanisms are designed in a way that optimizes accessibility to all projected-affected parties. Accessibility in this context refers to ensuring that grievance mechanism services and facilities provide effective access by all project-affected parties.

ESS 10 Annex 1, Grievance Mechanism Requirements:
“The grievance mechanism will include:

Measures to ensure the accessibility of grievance mechanisms to project-affected parties, including the provision of accommodations to facilitate equal access as needed in all stages of the process.

…”

The U.S. International Council on Disabilities looks forward to assisting the World Bank in this important endeavor and stands ready to provide further inputs in order to address disability inclusion within the ESS and the international development agenda more generally.

Sincerely,

Patricia Morrissey, Ph.D.
President