



**Review and Update of the World Bank's Environmental and Social Safeguard Policies
Phase 2
Feedback Summary**

Date: November 25, 2014

Location (City, Country): Dhaka, Bangladesh

Audience (Government, CSO, etc.): Disability leaders

Overview and Key Issues Discussed: Key issues discussed include: separate standard for disability; UNCRPD; accessibility; capacity building; involvement of disabled people in the entire project cycle; women with disability; project monitoring and implementation; and stakeholder engagement. **This summary is subject to change after review and comments from consultation participants.**

Specific Feedback from Stakeholders
1. General Comments
<p><i>Clarifications</i></p> <ul style="list-style-type: none"> • Clarification was sought on the Bank's internal effort for disability inclusion. • Clarification was sought on whether the Framework promotes the use of environmentally friendly construction materials. <p><i>Comments and recommendations</i></p> <ul style="list-style-type: none"> • The Bank should have a separate standard for disability. Without disabled people, the Bank will not achieve the social inclusion. • Disability should be a cross-cutting issue across all ESSs. • The Framework, as well as all Bank projects, should respect and comply with UN Convention of the Rights of Persons with Disabilities (CRPD). • Article 9 of CRPD on accessibility should be incorporated into the Framework, which requires the states to enable persons with disabilities to live independently and participate fully in all aspects of life, and take appropriate measures to ensure to persons with disabilities access to the physical environment, to transportation, to information and communications.

- Support for disabled persons under **CRPD** is not a charity, but the rights to be ensured.
- Putting disabled persons in the category of “marginalized and vulnerable” is insulting. Disabled people have their own identity. While some of them may be vulnerable, this is the result of exclusion. With a population of one billion, **disabled people are the largest minority** in the world. If the Bank truly strives for inclusive development, it must include disabled people. In the proposed Framework, disability makes up only a very small part. All Bank projects in Bangladesh exclude disabled people. Disabled people should not only be the beneficiary, but they should also be included in the **decision making process**, such as the project steering committee. Currently, all projects for disability are **designed, monitored and managed by people who have no expertise in disability issues**. Disabled people should be **involved in the entire project cycle**.
- **Disabled people are the poorest** of the poor in the country. The Bank should give more importance to them, when addressing no-discrimination issues.
- The Bank should support **training for sign language interpreters**. It should also support capacity building for school teachers in sign language ability.
- **Victims of gender-based violence with disabilities**, such as girls who have been kidnapped or raped, hesitate to speak out because of their language barrier. The Bank should address such victims.
- **Women with disabilities** are more discriminated and stigmatized. They should be also considered in the Framework.
- The Bank should organize **regular meetings with disabled people** like this consultation meeting, so that they can raise issues and concerns.
- The Bank should **continue to monitor projects** to verify the disability community is actually benefiting from the projects.
- While there is a Bank-funded project under Social Welfare Department, it only benefits government officials and not disabled people.
- Indigenous Peoples are not included in The Bank’s Local Governance Support Project (**LGSP**) in Chittagong Hill Tracts.

2. A Vision for Sustainable Development

N/A

3. World Bank Environmental and Social Policy

Comments and recommendations

- A functioning **grievance redress service** is important, such as for land acquisition and resettlement. The Bank should monitor the project implementation and **stop or postpone funding** for projects when the ministry in charge does not address the grievance.

4. Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts

Clarifications

<ul style="list-style-type: none"> • Unless the Framework provides more explicit, separate wording on disability, it will not be addressed at the implementation stage. For example, in the Bank-funded Local Governance Support Project (LGSP), local officials refuse to include disabled people, because disabled people are not specified as project beneficiary under vulnerable and marginalized groups. • Disability should be placed in the main body of the Framework, not in the footnote. • The definition of physical and mental disability should be provided in line with CRPD.
5. Environmental and Social Standard 2 (ESS2): Labor and Working Conditions
N/A
6. Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention
<i>Comments and recommendations</i> <ul style="list-style-type: none"> • For climate change adaption and mitigation, the Framework should consider physical parameter as well as geographical considerations, which are highly relevant for Bangladesh.
7. Environmental and Social Standard 4 (ESS4): Community Health and Safety
<i>Comments and recommendations</i> <ul style="list-style-type: none"> • The requirement of universal access should be introduced in the Framework in line with CRPD.
8. Environmental and Social Standard 5 (ESS5): Land Acquisition, Restriction on Land Use and Involuntary Resettlement
N/A
9. Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources
N/A
10. Environmental and Social Standard 7 (ESS7): Indigenous Peoples
N/A
11. Environmental and Social Standard 8 (ESS8): Cultural Heritage
N/A
12. Environmental and Social Standard 9 (ESS9): Financial Intermediaries

N/A

13. Environmental and Social Standard 10 (ESS10): Information Disclosure and Stakeholder Engagement

Comments and recommendations

- EIA report should cover all aspects related to disability issues. Stakeholder engagement should be conducted in a transparent and effective manner, including disabled people.