

World Bank Economic and Social Safeguards Review, Consultation meeting in Vienna 5th December 2014

Input LIGHT FOR THE WORLD

1. General points relevant for the whole framework

- We recommend adding a definition of 'persons with disabilities' to the framework which is in line with the Convention on the Rights of Persons with Disabilities.
- Disability should be treated as a cross-cutting issue throughout the framework, ergo in all Environmental and Social Standards. Mainstreaming disability in all policy areas and standards/assessments would help to reduce the risk of continuous exclusion of and harm to persons with disabilities in programs.
- Persons with disabilities should be actively invited to all consultation meetings (organizing partners such as host state entities might need to be reminded of that) and online consultations.
- The collection of disability disaggregated data is vital to be able to measure and monitor programs with regard to their impact on persons with disabilities.
- The application of Universal Design in all programs would ensure accessibility for all potential stakeholders, thereby minimizing the risk of discrimination and exclusion.

2. Specific input on selected chapters of the framework

2.1. ESS 1 Assessment and Management of Environmental and Social Risks and Impacts

We appreciate that disability has been mentioned in ESS 1, in particular on page 27, paragraph 26 (footnote). However, it is advisable to establish a comprehensive principle of non-discrimination under ESS 1 to ensure that programs are assessed in a way to always include and reach marginalized groups.

Paragraph 22 on page 26 should be extended to explicitly include persons with disabilities and other marginalized groups, i.e. any assessment should include information on the potential risks and impacts of a planned project on these vulnerable social groups.

Mandatory accessibility and inclusion plans as part of the Environmental and Social Commitment Plan should be added to the annex of ESS 1 to make sure that disability inclusion

has to be actively considered by the Borrower. Any stakeholder engagement plans have to actively include persons with disabilities and their representative organizations.

2.2. ESS 2 Labour

Internationally agreed labor and employment regulations should be applied as the standard for all programs in order to mitigate dangers such as unsafe working conditions, child labor, inadequate wages and discrimination.

Persons with disabilities' unemployment rates are disproportionately higher than average, a fact that stems from a variety of interlinked factors such as exclusion from education and vocational training, prejudice and lack of belief in their skills and potentials as staff members, lack of accessible work environments, this reinforces the so-called cycle of poverty and disability.

ESS 2 and all World Bank funded projects/programs should explicitly and actively promote inclusive labor environments to contribute to a decrease of prejudice and social exclusion towards persons with disabilities. This includes active employment of persons with disabilities, also within the project coordination and implementation staff.

The title of paragraph 9 on page 37 should be "Non-Discrimination, Equal Opportunity and Access to Employment by Marginalized Groups". The text should mention Borrowers' obligation to include persons with disabilities in all labor-related areas, among them active recruitment, non-discriminatory job adverts, accessible infrastructure and adaption of the work environment in line with accessibility standards.

2.3. ESS 10 Information Disclosure and Stakeholder Engagement

Active and meaningful participation of vulnerable and marginalized groups has to be realized in all consultations. These include indigenous people, persons with disabilities, children, women, older people and in particular persons who experience multiple discrimination, such as women with disabilities, older people belonging to a minority etc.; they should be added to any consultation list the Borrower puts together.

For persons with disabilities to be able to meaningfully participate and access all relevant information, full accessibility (including infrastructure, communication and information) has to be realized throughout the process.

All consultations and engagements with stakeholders should meet the following requirements: reach all stakeholders (potentially) affected by the project, ensure transparency, provide access to information for all, provide safe space for giving opinions, guarantee freedom of speech, ensure participation of diverse groups.

These features might be at risk when responsibility for ESS 10 lies with the Borrower whose main interest would be to receive the investment.

Guiding questions for stakeholder engagement:

- ➔ How will quality participation be guaranteed and mere "surrogate" participation/consultation be avoided?
- ➔ How will stakeholders be reached and identified? (ESS10 reads that the Borrower shall be responsible for the identification of stakeholders. This would not guarantee that all stakeholders are reached)
- ➔ How is participation of vulnerable groups, in particular persons with disabilities who might have specific communication and accessibility needs, guaranteed?

- ➔ What is the Bank's role in guaranteeing quality participation? (Considering that the Borrower might not have the (financial) means to cover costs necessary for meaningful participation)

Paragraph 6 on page 93 should include reference to accessibility to ensure access to information for and meaningful participation of persons with disabilities.

Paragraph 12 and 13, page 94: Reaching out to and ensuring active and accessible participation of marginalized groups should be anchored in the main text, instead of only in a footnote.