

Mr. Robert Tan
The World Bank Group
1818 H Street, NW
Washington, DC 20431

Dear Mr. Tan,

The disability community understands the great importance the World Bank Environmental and Social Safeguard policies play in helping to protect people and the environment in developing countries. We appreciate the opportunity to engage in the Safeguard review process to help make the Safeguards stronger for persons with disabilities, who are especially vulnerable to the detrimental effects of poverty.

The needs and rights of persons with disabilities have not been addressed in the current Safeguards. Consequently, persons with disabilities are not systematically consulted nor considered in the planning and design of projects that have wide-ranging, cross-cutting negative impacts on persons with disabilities nor do persons with disabilities have the opportunity to proportionately share in project benefits. The inclusion in the first draft of the proposed Environmental and Social Framework of persons with disabilities in “disadvantaged or vulnerable groups” is a step in the right direction. However, without explicit definitions of the key terms below, persons with disabilities cannot be effectively engaged stakeholders fully benefitting from World Bank projects, as the World Bank and the Borrower will be unable to capture the unique ways in which persons with disabilities are impacted by projects. It is therefore imperative that the World Bank:

- Specifically defines “persons with disabilities” using the definition outlined in the United Nations Convention on the Rights of Persons with Disabilities (CRPD);
- Defines “inclusion” to include persons with disabilities as persons “who are often excluded”;
- Defines “accessibility” to include full participation of persons with disabilities in the World Bank project lifecycle;
- Defines “safety” to demonstrate the strong link between disability and safety;
- Definitively links the definition of “disadvantaged or vulnerable” to adverse impacts by projects, inability to fully share in the project benefits, and the requirement of specific measures to participate in the consultation process; and
- Defines the different parameters for qualifying as “High Risk, Substantial Risk, Moderate Risk or Low Risk” for project classifications.

The inclusion of these definitions in the proposed Standards will enable the World Bank and the Borrower to assess the unique and differentiated impacts of World Bank projects on persons with disabilities, who span all worldwide groups, and not just on “disadvantaged or vulnerable groups.” This must include not only the unique needs of persons with disabilities in the project and/or project area of influence but also in stakeholder engagement as outlined in Environmental and Social Standard 10.

The needs and rights of persons with disabilities as outlined in the CRPD must be upheld by the World Bank and the Borrower. The World Bank cannot achieve its mission to end extreme poverty without ensuring that persons with disabilities benefit from and are not harmed by World Bank projects. Achieving that outcome is only possible if the proposed Standards address the specific and unique impacts of projects on persons with disabilities and are included in all relevant Standards, including ESS 1, 2, 4, 5, 7, 8, and 10.

Sincerely,

Lauro L. Purcil Jr., Convenor Philippine Coalition on the United Nations Convention on the Rights of Persons with Disabilities (CRPD)

CC: World Bank Executive Directors, World Bank Alternate Executive Directors, and World Bank Safeguard Advisors