

Promoting disability inclusion at COP30 – Sightsavers key messages

People with disabilities are disproportionately impacted by climate change, including threats to health, food security, water, education, and livelihoods. These stem from a combination of structural and social factors such as social and economic exclusion, limited access to essential services, and barriers in the physical environment. Climate-related hazards therefore present a ‘double-burden’ for people with disabilities who experience the same challenges as the wider population plus those associated with disability. Despite this, people with disabilities are often excluded from climate policy and decision-making at the local, regional and global levels.

The Paris Agreement requires parties to, when taking action to address climate change, respect, promote and consider their respective obligations on human rights, including the rights of persons with disabilities. The Convention on the Rights of Persons with Disabilities (CRPD) guarantees the rights to life, health, education, accessibility, independent living, personal mobility which are all important in the case of climate impacts. It also mandates states to take into account the protection and promotion of the rights of people with disabilities in all policies and programmes.

The rights, experiences and perspectives of people with disabilities should be considered across the different workstreams of the UNFCCC and across discussions and events at COP30. Without this it will not be possible to ensure an inclusive approach to the climate crisis.

Disaggregation in the Global Goal on Adaptation indicators

The global goal on adaptation and its intention to reduce the adverse impacts, risks and vulnerabilities associated with climate change is of critical importance for persons with disabilities. Article 7 of the Paris Agreement acknowledges that adaptation action should consider vulnerable groups, which include people with disabilities.

We welcome the inclusion of disaggregation guidance in the indicator framework. This is key to ensure that vulnerable populations are considered in, and benefit from, adaptation processes. We further welcome the inclusion of disability status within the social categories for disaggregation.

However, the guidance that the types and level of disaggregation for the indicators should be encouraged more strongly than “as relevant and feasible”. Countries should be encouraged to disaggregate by as many social variables as possible, particularly where they currently collect disaggregated data through other mechanisms such as censuses, surveys, outpatient records etc. There are internationally agreed ways of collecting data on disability inclusion, including through the Washington Group Question Sets. There are a substantial number of countries who utilise the Washington Group Questions, or other methods, in population studies and censuses¹.

Collecting data on people with disabilities is an obligation for states that have ratified the CRPD. Article 31 requires States Parties to “undertake to collect appropriate information, including

¹ As outlined in the Disability Statistics Questionnaire Review Database

statistical and research data” and states that data “shall be disaggregated, as appropriate, and used to help assess the implementation of States Parties’ obligations under the present Convention and to identify and address the barriers faced by persons with disabilities in exercising their rights.”

Inclusion within the Belém Health Action Plan

People with disabilities globally experience persistent health inequities resulting from a combination of structural factors, social determinants of health, health-related risks and health system factors that disproportionately impact people with disabilities and older people.² Persistent and pervasive health inequities affecting people with disabilities resulting from lack of access to services and greater exposure to social determinants of health means that they are disproportionately affected by the health impacts of climate change.

As outlined in the plan, adaptation measures “must address health inequities” that are exacerbated by climate change, it is therefore important to have specific actions targeted to ensuring those who experience inequities on a daily basis such as persons with disabilities.

We strongly welcome the acknowledgement of the need to include populations in situations of vulnerability and their representative organisations in national and regional climate-health governance mechanisms. Organisations of persons with disabilities are experts who can speak to the barriers that exist and how they can be overcome to ensure inclusive and accessible climate adaptation. This combined a commitment to strengthen local and regional capacity, is welcome.

We support the commitment to universal design for evacuation routes and fostering accessibility when adapting health and urban infrastructure to climate change.

Areas to strengthen the Action Plan

We are disappointed to see the removal of a specific action plan point on persons with disabilities. While we welcome a more mainstreamed approach to inclusion including accessible early warning systems and public health campaigns and the recommendation of developing contingency plans tailored to populations in situations of vulnerability. There is a concern that “inclusive” and “inclusion” can be interpreted differently by different stakeholders. This document would benefit from a footnote/ annex that sets out what is meant by inclusive and inclusion and what the document means by health equity.

Persons with disabilities are often excluded from consultative mechanisms as they are, mistakenly, assumed to have little to add. Persons with disabilities and their representative organisations need to be included in the leadership and governance processes as outlined in the cross-cutting principles and the financial and attitudinal disadvantages that they face in main aspects of life should be addressed.

The collections and analysis of climate-health impact data should be “disaggregated by vulnerable groups”, we have been advocating for indicators within the **GGA indicators to be disaggregated**

² WHO, 2022. Global report on health equity for persons with disabilities

by disability. Collecting data on persons with disabilities is an obligation for UN Member States that have ratified the Convention on the Rights of Persons with Disabilities (CRPD). Article 31 of the CRPD, requires States Parties to “undertake to collect appropriate information, including statistical and research data” and states that data “shall be disaggregated, as appropriate, and used to help assess the implementation of States Parties’ obligations under the present Convention and to identify and address the barriers faced by persons with disabilities in exercising their rights.” The inclusion of **disability status as a disaggregation for the health and vulnerability data** (action line 2.4.2) is also needed. We would welcome a commitment both within the BHAP and the GGA indicators to abide by the obligations under the CRPD.

Accessibility is central to ensuring that persons with disabilities are not left behind in this action plan. Operational response protocols (action line 1.3.4) **should be accessible and inclusive considering additional needs** that persons with disabilities and other vulnerable populations may have during climate events. Easy read materials should be a part of language accessibility in policy making and project cycles (action line 2.1.2) to ensure more inclusive action.

Article 11 of the UN CRPD obliges Member States to “take, in accordance with their obligations under international law, including international humanitarian law and international human rights law, all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including situations of armed conflict, humanitarian emergencies and the occurrence of natural disasters.” It is necessary that climate and health adaptation efforts take this into account particularly including persons with disabilities and their representative organisations within the process of consultation and implementation of this plan.

Formal recognition of the Disability Caucus with a pathway to the creation of a Disability Constituency

Persons with disabilities and their representative organisations are often not in the room and their perspectives not considered when global and national policies on climate change are developed. This includes within UNFCCC processes and discussions.

We call on Parties to support the recognition of an official disability caucus with a pathway to a creating a **formal disability constituency** within the UNFCCC. States should request to open the AIM negotiation agenda at COP30 to be broadened to include Observer participation.

At the SB62 three constituencies called and made the request for a recognition of the Disability Constituency, as recorded in the SB62 AIM outcome document. The informal Disability Caucus is in contact with the Secretariat and has developed a Terms of Reference for the constituency. States have the opportunity to progress this agenda at COP30 by call for the formal recognition of the Caucus with a pathway to the creating a formal constituency.

A constituency will allow persons with disabilities and representative organisations to bring their perspectives and experience to climate policies, as mandated by the UN Convention on the Rights of Persons with Disabilities (CRPD) Article 4.3, and in alignment with the Paris Agreement.

Disability inclusion in national climate plans at and beyond COP30

COP30 marks the formal conclusion of the Nationally Determined Contribution 3.0 cycle and countries should have submitted their updated NDCs ahead of COP30. While some Parties have submitted and are entering the implementation phase others have not and are still in the process of updating their NDCs.

References to persons with disabilities are absent in most NDCs and even when they are present, are largely confined to referring to persons with disabilities as a group with heightened vulnerability to the impacts of climate change, rather than including concrete action³. Many NDCs do also not include or do not include much detail on education or health.

Many Parties are also developing their National Adaptation Plans (NAPs), strategic frameworks to identify and address their medium- and long-term climate adaptation needs.

To promote policy coherence, States should align their climate policies and programs with international human rights law, ensuring NDC commitments align with and advance human rights principles, standards, and obligations. NDCs and NAPs should integrate disability considerations throughout all key sectors and themes, rather than treating disability merely as a standalone issue. Inclusion of persons with disabilities into NDCs and NAPs is necessary and critical for all Parties response to climate change, and the plans should acknowledge how climate change uniquely affects persons with varying disabilities and their rights. Any mitigation and adaptation measures should include measures targeted to those who are disproportionately impacted.

Consultation processes for the development of policies and strategies should be inclusive and accessible. Persons with disabilities and their representative organisations are experts in their own right and should be included in consultation processes for all national climate measures.

Further information

Sightsavers is an international development organisation which works with partners to prevent avoidable blindness, eliminate neglected tropical diseases (NTDs) and promote the rights and inclusion of people with disabilities in more than 30 countries in Africa and Asia. We are a member of the Alliance for Transformative Action on Climate and Health, the Global Climate and Health Alliance, Climate Action Network (CAN) and the informal Disability Caucus, and engage at national, regional and global levels to ensure that persons with disabilities are included in climate discussions, policies, programmes and strategies.

For more information please contact Fiona Lawless (flawless@sightsavers.org) or Hannah Loryman (hloryman@sightsavers.org)

³ Status Report on Disability Inclusion in National Climate Commitments and Policies, June 2022; Disability Inclusive Climate Action Research Program at McGill University and the International Disability Alliance