COP31 must put disability inclusion on the climate agenda



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■ VASHKAR BHATTACHARJEE

As another global climate summit approaches, the world must confront the fact that the voices of persons with disabilities, who are among the most vulnerable to climate change, are still largely absent from the decisions shaping their life and future.

I met Tayeb Ali, who has visual impairment, on October 31 at a reunion programme organised by the alumni association of the Government School for the Visually Impaired in Chattogram. I first came to know Tayeb when he was admitted to the school. He had experienced a tragedy that no child should have to endure. During a devastating disaster, members of his family had left him behind, possibly because they did not know how to evacuate or protect a child with visual impairment. Many of his family members subsequently lost their lives or went missing. But Tayeb survived. Our conversation brought back memories of a painful past that reminded me of the enduring silence or neglect surrounding the vulnerabilities of people with disabilities in climate negotiations.

Tayeb's survival did not mean that the disaster was over. Years later, he continues to face the consequences of climate-related hazards. Floods, storms, salinity intrusion, and extreme heat have repeatedly disrupted his life and livelihood, as they have those of many others. Crops are damaged, economic security disappears, and opportunities to escape poverty become increasingly limited. "I might have survived the 1991 cyclone," said Tayeb, "but every day since then has been a relentless war against nature, even my mere existence."

As he described his circumstances, one message stayed with me: that such a disaster is not a single event; it returns year after year, taking away whatever little stability that people, including those with disabilities, manage to rebuild. I found myself asking, when we discuss climate adaptation, resilience, and loss and damage, do we ever imagine what these words mean to someone like Tayeb?

Another conversation I had with a physically challenged entrepreneur from the Patharghata area of Chattogram revealed a different dimension of the same crisis. He explained how tidal flooding periodically submerges his neighbourhood. When water rises, he cannot leave his home independently. His business activities stop and his income suffers as a result. For him, the problem is not just the rising water but also the absence of accessible infrastructure, safe transportation, inclusive preparedness, and adequate support. "Here I live in a city, an urban settlement, but the city stays inundated. Even with water around, people can still commute by different vehicles, but I have to stay indoors due to the lack of accessible transportation and proper planning," he said.

These are not isolated stories. They reflect the experiences of countless people with disabilities across Bangladesh, particularly in coastal and disaster-prone areas. Climate change does not affect everyone equally. A cyclone warning may not reach someone who is deaf. An evacuation shelter may offer protection to many but remain inaccessible to a wheelchair user. A person with visual impairment may receive the warning but still be unable to navigate an unfamiliar evacuation route without assistance. A disaster becomes more devastating when disability intersects with poverty, inaccessible infrastructure, discrimination, and exclusion from decision-making.

According to the United Nations Office for Disaster Risk Reduction's (UNDRR) 2023 Global Survey on Persons with Disabilities and Disasters, 84 percent of respondents did not have a personal disaster preparedness plan, while 86 percent reported not participating in community-level disaster risk reduction decision-making and planning. These figures expose a fundamental failure: those who face some of the greatest barriers during disasters are frequently excluded from designing or accessing systems meant to protect them.

I witnessed another side of this exclusion when I had the opportunity to attend the UN climate conference in 2015. It was an important experience, but I was struck by how limited the participation of persons with disabilities appeared to be in the broader climate discussions. Since then, I have not had another opportunity to attend a COP. Such opportunities remain extremely limited for many disability advocates, particularly those from developing countries. The barriers are not just physical. These include the cost of participation, inaccessible information, limited representation within national delegations, insufficient funding for organisations of persons with disabilities, and the persistent failure to recognise disability inclusion as a central climate justice concern.

Now, as world leaders prepare to gather in Antalya, Türkiye, for COP31 from November 9 to 20, 2026, I find myself asking: whose voices will shape the future of climate action? Will someone like Tayeb have a place in those conversations? Will an entrepreneur who loses income because of inaccessible roads and tidal flooding influence adaptation priorities? Will disability advocates have meaningful opportunities to contribute to decisions about climate finance, early warning systems, and loss and damage?

True, international commitments already provide a foundation. The UN Convention on the Rights of Persons with Disabilities recognises the obligation to protect persons with disabilities in situations of risk and humanitarian emergencies. The Sendai Framework for Disaster Risk Reduction emphasises inclusive, accessible, and participatory approaches. The Paris Agreement also acknowledges the need to respect and consider the rights of persons with disabilities in climate action. Despite all this, the distance between international commitments and everyday reality remains enormous.

Bangladesh has made important progress in disaster preparedness and early warning. However, significant gaps persist in ensuring that preparedness, evacuation, shelters, recovery assistance, and climate adaptation initiatives are accessible to everyone. Disability inclusion must, therefore, move beyond symbolic references in policy documents. Governments, including in Bangladesh, must ensure the meaningful representation of persons with disabilities and their representative organisations in national climate delegations, policy consultations, and adaptation planning. Participation must mean having an opportunity to influence decisions, not merely being present in a conference room.

Climate finance must also explicitly address disability inclusion. Resources should support accessible shelters, inclusive early warning systems, disability-responsive infrastructure, resilient livelihoods, and community-based adaptation initiatives. Organisations of persons with disabilities should have better opportunities to access funding and lead solutions. Furthermore, disability-disaggregated data and research must become an integral part of climate policymaking. Without understanding how different groups experience climate hazards, governments cannot design equitable responses. Most importantly, disability inclusion must be embedded in national and local disaster management, climate adaptation, and loss-and-damage mechanisms. Every relevant institution should be accountable for ensuring that people with disabilities are not excluded.

These people are not simply vulnerable individuals waiting to be rescued. Their expertise and lived experiences can make climate solutions more practical, effective, and inclusive. Tayeb's story is not merely about the tragedy of being left behind during a disaster. It is also about the extraordinary resilience of someone who has continued to rebuild his life despite repeated setbacks. But resilience should never become an excuse for institutional neglect in the face of repeated hardships.

As COP31 approaches, the international community must recognise that climate justice cannot be achieved while persons with disabilities remain invisible or only symbolically involved in climate-related negotiations, national policies, and financial decisions. They must be equal partners in shaping those policies and decisions.



VISUAL: **ANWAR SOHEL**

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Can we make ship recycling both green and commercially viable?



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For years, the ship recycling industry has provided critical raw materials to the steel industry, generated tax revenue for the government, and provided jobs to thousands of people. However, many entrepreneurs in this industry, which involves hazardous operations and significant environmental risks, face financial constraints that hinder their ability to upgrade facilities and maintain environmental standards. In response to requests from ship recycling yard owners, last month, the government downgraded shipbreaking yards from the red to orange category under the Environment Conservation Rules, 2023. The move has reopened an important debate: how can Bangladesh protect its environment and workers while ensuring that this economically important industry remains competitive? The answer should not be a choice between industrial growth and environmental protection, but a balanced framework that makes sustainable ship recycling commercially viable.

According to the secretary of the Ministry of Industries, ship recycling is a promising industry with an estimated 6,500 ships expected to be ready for scrapping worldwide by 2030. International ship owners' association, Baltic and International Maritime Council (BIMCO), predicts around 16,000 vessels will be available for recycling in the next decade. To meet global expectations on safe recycling, the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC) came into force on June 26, 2025. Bangladesh ratified the convention in June 2023. But to improve its position internationally, the industry in Bangladesh must invest heavily in recycling facilities that protect the environment and workers.

Under the Environment Conservation Rules, 2023, ship recycling was placed in the red category for environmental clearance, which required a detailed Environmental Impact Assessment along with public consultation and review by the Department of Environment (DoE). The DoE's certification was required both for the site, that is, the yards, and the measures taken to ensure that the operations—ship recycling or cutting—are safe for the environment and human health.

However, ship recycling entrepreneurs have been concerned about the lengthy approval process, because dismantling a ship after it is beached can take up to 90 days, waiting for suitable tides and weather, the operating costs often increase as revenue gets delayed. The red category also means the industry is not eligible for specific green funding from Bangladesh Bank. But to improve their yards, owners require large investments.

An industry that is trying to invest billions to comply with international environmental and safety standards cannot realistically do so without help from financial institutions. On one hand, companies are being encouraged to go greener, but on the other, due to their category, they often cannot access the funding. The question, therefore, is how companies can be helped to overcome this challenging task, without risking the environment. Besides, any changes to the category need to comply with the Bangladesh Environment Conservation Act, 1995, Environment Conservation Rules 2023, Ship Recycling Act, 2018, and any relevant international obligations.

One solution could be making the monitoring tools under the red category mandatory for ship-cutting activities under the orange category. The authorities should issue a separate notice detailing clearly the requirements that will be needed to identify risks, mitigate them, and complete an environmental assessment. Besides, consultation and independent assessments should still be completed where required by law.

Such an approach could streamline the regulatory approval process without creating an environmental regulatory vacuum. It will help balance the industry's growth potential by ensuring access to green finance whilst still maintaining environmental standards and legal standards. However, the proposed notification must have a clear legal basis, remain consistent with the parent law and applicable rules, and establish specific, enforceable compliance requirements. It must not be used as a mechanism to circumvent statutory EIA obligations.

The reclassification should not reduce any current obligations the industry follows regarding Inventory of Hazardous Materials (IHM), segregation, safe storage, handling, treatment, and disposal of hazardous waste. All vessels arriving should have IHM completed correctly and ship recycling facilities should have proper processes in place to identify, manage and handle hazardous materials. The Bangladesh Ship Recycling Board currently requires ship recycling plans, IHM, and proper safety and waste management measures. This can be used as the basis for the special notice/order. Compliance with the HKC and national hazardous waste legislation should be made an integral requirement.

Besides, the government should expedite the development of a joint hazardous waste treatment facility, particularly the treatment, storage and disposal facility (TSDF) at Mirsarai. In addition, government departments responsible for oversight of the industry must be manned with staff with the right knowledge and skills. Without the necessary infrastructure, skilled individuals and proper oversight, ensuring environmental standards in the ship creaking industry will be difficult. Regular independent inspections should be conducted for gas detection before entry into confined spaces; emergency preparedness, ensuring use of correct PPE, and employment of skilled staff at yards. Green accreditation should be an ongoing process.

Moreover, a green financing mechanism should be developed jointly by the government, Bangladesh Bank, and commercial financial institutions for the industry. Only yards that are genuinely compliant and eligible should be able to access green sustainable financing through a clear policy. This could include long-term concessionary loans, partial credit guarantees, and targeted grants. Financial support should be tied to verifiable improvements in environmental and occupational safety. Individual yards should be assessed by banks using clear compliance indicators. International development partners such as the International Maritime Organisation, World Bank, Asian Development Bank, and International Finance Corporation could also support through technical assistance, infrastructure sharing and blended funding.

India invested 53.5 crore rupees in the industry under the Ferrous Scrap Development Fund, upgrading 109 recycling yards. It has also implemented the Shipbreaking Credit Note Scheme for eligible shipowners to incentivise them to dismantle ships in HKC-compliant yards. Meanwhile, Pakistan announced a 12 billion rupees upgrade to its Gadani shipbreaking site to improve hazardous waste issues and provide better facilities for workers. Bangladesh can implement similar incentives suitable for its industry. The aim should be to create predictability in the market and reward ethical businesses in a positive way. The relevant ministries and active representatives from civil society organisations should be heavily involved in the whole process.

Thus, it should be a conditional reclassification with mandatory environmental assessment under a standalone enforceable order (if legally possible), strict IHM and hazardous waste management, green funding for yards that are compliant and independent oversight of environmental and occupational standards.

Bangladesh does not have to choose between supporting its ship recycling industry and protecting the natural environment. There must be a regulatory and financial system in place that allows for both. Orange classification (if legally justified) should never be used to undermine environmental responsibilities. Also, the environmental regulations should not hinder responsible businesses from gaining funding. The ultimate objective should be to ensure that Bangladesh develops a commercially viable ship recycling industry with responsible worker protection, hazardous waste management, and protection of the coastal environment for future generations.



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FILE PHOTO: **RAJIB RAIHAN**