Rights of persons with disabilities and EU climate action – Policy Brief

European Disability Forum Position Paper

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Advancing climate and social justice: How the European Union can ensure inclusion of persons with disabilities

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Introduction

In recent years, the European Union (EU) has introduced a comprehensive range of climate policies under the European Green Deal, aiming to guide its economy and society toward climate neutrality by 2050. From the outset, the 2019 European Green Deal Communication emphasised that this transition must "leave no one behind," with particular attention to people most at risk from climate change and those likely to bear the greatest burden of the green transition.

Among these groups are more than 100 million Europeans with disabilities; the largest and often most overlooked demographic. For the green transition to be truly just and inclusive, climate policies must actively incorporate their voices, requirements, and rights. This is not only a matter of equity but also an opportunity to challenge ableism and build a more just society.

In this context, assessing how European climate policies have addressed the rights of persons with disabilities is essential as the EU enters the next phase of its climate agenda under the 2024–2029 European Commission mandate. Integrating disability inclusion into climate policy will not only strengthen climate action but also foster broader societal resilience. When systems are designed with accessibility and inclusion in mind, they become more efficient and effective for everyone, not just for persons with disabilities.

About this Briefing

This briefing provides an overview of disability-specific provisions within the European Union's climate policies under the European Green Deal and the newly introduced Competitiveness Compass. It also situates these policies within the broader international context, particularly the EU's commitments under the Paris Agreement, including the forthcoming revision of its Nationally Determined Contribution (NDC). The briefing examines how EU climate action intersects with the Union's broader disability frameworks, highlighting both existing measures and critical gaps where further action is urgently needed to ensure an inclusive, rights-based green transition.

The briefing builds on findings from a recent study by the European Disability Forum[1], which assessed disability-inclusive provisions in the national climate policies of 13 countries across Europe and Central Asia. The study revealed limited recognition of the rights and requirements of persons with disabilities in national climate strategies, as well as a lack of coordination with disability policy.

By shifting the focus to the EU level, this briefing aims to complement that analysis and provide a more complete picture of disability-inclusive climate action in Europe. It concludes with a set of concrete recommendations for policymakers on how the EU can strengthen disability inclusion in its climate policy framework, ensuring that the European Green Deal fulfils its core promise to "leave no one behind."

[1] EDF, November 2024. 'Mapping Disability Inclusive Climate Action in Europe'.

Glossary

Term	Definition
Citizen's energy package	A European Commission strategy aimed at empowering consumers and communities to benefit from lower energy costs and improved energy services
Clean industry	Industry that has adopted technologies to limit, compensate or bring to zero its emissions that contribute to climate change
Climate adaptation	Policies that aim at protecting the population from the effects of climate change, most notably from climate disasters and the way they disrupt lives, infrastructure and services
Competitiveness Compass	A European Commission roadmap published in January 2025 to restore Europe's dynamism and boost our economic growth.
Corporate Sustainability	The responsibility of companies to manage their environmental, social, and governance (ESG) impacts in a way that supports long-term economic performance while contributing to sustainable development.
United Nations Convention on the Rights of Persons with Disabilities (CRPD)	International human rights treaty that promotes, protects, and ensures the full and equal enjoyment of all human rights and fundamental freedoms by persons with disabilities. It emphasises dignity, non-discrimination, accessibility, and inclusion in all areas of life.
Euroclima	A regional cooperation program between the European Union and Latin America and the Caribbean focused on public policies to address climate change.
EU Nationally Determined Contribution (NDC)	The EU NDC is the European Union's official climate action plan under the Paris Agreement, outlining its greenhouse gas emissions reduction target and related policies.

European Social Fund Plus	European Union's main instrument for investing in people and supporting the implementation of the European Pillar of Social Rights.
Just Transition	The European Union's commitment to ensuring that the shift to a climate-neutral economy is fair, inclusive, and leaves no one behind, especially communities, workers, and regions most affected by the green transition
Just Transition Work Programme	An initiative launched at COP28 (2023) to support states in implementing just transition pathways that are inclusive, equitable, and based on social dialogue. It focuses on securing decent work, social protection, and environmental sustainability during the climate transition.
Gender Action Plan (GAP)	A framework adopted by the UNFCCC to advance gender-responsive climate action and ensure women's full, equal, and meaningful participation in the climate process. It builds on the Lima Work Programme on Gender.
Global Gateway	The European Union's strategy to support sustainable and trusted infrastructure development around the world, aiming to boost smart, clean, and secure links in areas like digital, energy, transport, health, and education, while promoting democratic values and high environmental and social standards.
Global Goal on Adaptation (GGA)	A key objective of the Paris Agreement focused on enhancing adaptive capacity, strengthening resilience, and reducing vulnerability to climate change.
Green Deal	Political programme launched in December 2019 by the European Commission to make the EU adopt ambitious climate policies while growing economically
Implementation Dialogues	Consultation tool at the political level launched in the spring of 2025 to make EU laws and policies simpler and to implement them better.

Multiannual Financial Framework	Legislative framework of the EU to orient the investment priorities of its annual budget over a period of at least 5 years (commonly 7 years)
New Collective Quantified Goal on Climate Finance (NCQG)	A process under the Paris Agreement to establish a new global climate finance target, to be set before 2025. It builds on the previous $100 billion per year goal and aims to scale up financial support for developing countries to address climate change.
Organisation of Persons with Disabilities (OPD)	An organisation led, directed, and governed by persons with disabilities, where persons with disabilities form most of its membership and governing body.
Paris Agreement	An international treaty adopted under the UNFCCC in 2015, aimed at limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C. It establishes legally binding obligations for transparency, adaptation, and financial support, and requires countries to submit and update climate action plans (NDCs).
Persons with disabilities	Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others (Article 1 CRPD).
Team Europe	EU initiative that brings together the European Union, its Member States, and financial institutions like the European Investment Bank to work collectively on global challenges, such as climate action.
United Nations Framework Convention on Climate Change	United Nations Framework Convention on Climate Change (UNFCCC) is an international treaty established in 1992 to coordinate global efforts to combat climate change by limiting greenhouse gas emissions and promoting climate resilience.

A Brief Review of Disability-Inclusive Climate Change-Related Provisions in European Policy

Disability rights in current European climate action policies

Within the **European Green Deal** of the 2019–2024 European Commission, several legislative initiatives are particularly relevant to persons with disabilities, including:

- **Accessibility** for persons with disabilities is a mandatory obligation for **charging stations of electric vehicles** (Alternative Fuels Infrastructure Regulation)[2] as well as for the **renovation of buildings** (Energy Performance of Buildings Directive)[3].
- The **Corporate Sustainability** Due Diligence Directive[4] and Corporate Sustainability Reporting Directive[5] mandate companies active in the EU to report on their efforts to reduce negative impacts on persons with disabilities and other groups at risk, including considering the intersectionality with gender, racialisation, indigenous status and sexual orientation, among others.
- The **Social Climate Fund[6]** and **Just Transition Fund[7]** are designed to support people most affected by the shift to green energy in Europe. The Social Climate Fund focuses on tackling energy and transport poverty, while the Just Transition Fund helps people gain green skills for new job opportunities. Both funds explicitly call for the inclusion of persons with disabilities, both as consulted stakeholders in decision-making and as beneficiaries of funding and support measures.
- The European **Climate Pact[8]** is an EU initiative that encourages citizens to act for a more sustainable Europe and supports the EU's goal of climate neutrality by 2050. While it aims to boost public

[2] See Annex II 'Technical Specifications', 1.18 of Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the deployment of alternative fuels infrastructure
[3] See Articles 7(6), 8(3) and Annex II of Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast)
[4] Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence.
[5] Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.
[6] Regulation (EU) 2023/955 establishing a Social Climate Fund
[7] Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund
[8] Communication COM/2020/788 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions-European Climate Pact.

involvement in climate policy, it currently lacks ambassadors with disabilities or expertise in disability rights.[9]

The EU's **Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030**[10] aligns with the European Green Deal, acknowledging the unique challenges climate change poses to persons with disabilities and the need for an inclusive green transition.

At the international level, the EU plays a leading role in climate diplomacy, engaging in climate discussions both at global forums like the **United Nations Framework Convention on Climate Change (UNFCCC)** and through direct negotiations with individual countries. Through its **Global Gateway**[11] program, the EU is the largest global provider of development aid. Within this framework, the **Team Europe**[12] and **Euroclima**[13] programmes focus on supporting green investments and providing technical assistance on climate policy, particularly in countries of the Global South.

Disability rights in upcoming European climate policies

Since the European Parliament elections in June 2024, a new European Commission has been formed and was officially inaugurated in December 2024. The Commission has begun to outline its policy priorities through key documents, including the Political Guidelines 2024–2029[14], the Competitiveness Compass[15], and the Work Programme 2025[16]. While these documents currently lack new measures specifically addressing disability, some of the announced climate policies hold significant potential for advancing the inclusion of persons with disabilities:

- The next **Multiannual Financial Framework (MFF) post-2027** will channel investments in clean industry through a Competitiveness Fund and will increase funding for climate

[9] See Climate Pact database of ambassadors per EU country
[10] European Commission, Union of equality- Strategy for the rights of persons with disabilities 2021-2030
[11] Joint Communication JOIN/2021/30 to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank - The Global Gateway
[12] Read more about Team Europe Initiatives
[13] Read more about Euroclima initiatives
[14] Political guidelines for the next European Commission 2024-2029
[15] COM/2025/30 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions- Competitiveness Compass
[16] COM/2025/45 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions- Commission Work Programme 2025

adaptation and disaster response.[17] A proposal with further details is expected by mid-2025.

- At least two **Implementation Dialogues[18]** per year with relevant stakeholders are organised by all European Commissioners, including those for Climate, Energy & Housing, and Transport.[19] In parallel, the **Climate Pact** is set to continue connecting and involving citizens in the green transition.
- A **European Climate Adaptation Plan[20]** will outline EU's actions to address the impacts of climate change on infrastructure and communities and will lay the groundwork for future legislation aimed at enhancing the EU's preparedness for climate-related disasters. The European Commission announced its publication for 2026.
- A **Citizens Energy Package[21]** launched in February 2025 aims to enhance public participation in the energy transition, strengthen social measures supporting this shift, and address the issue of energy poverty.

Disability rights in international climate agreements

As a Party to the **Paris Agreement**[22], the EU has both the responsibility and the opportunity to lead by example in ensuring that the rights of persons with disabilities are systematically included in all international climate frameworks. This includes, but is not limited to, the New Collective Quantified Goal on Climate Finance[23], the Global Goal on Adaptation[24], the Gender Action Plan[25], and the Just Transition Work Programme[26].

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[17] COM/2025/46 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions- the road to the next multiannual financial framework

[18] Learn more about the Implementation Dialogues

[19] Please find the calendar for the Implementation Dialogues on the European Commission webpage.

[20] COM/2021/82 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions- Forging a climate-resilient Europe - the new EU Strategy on Adaptation to Climate Change.

[21] COM/2025/79 from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions- Action Plan for Affordable Energy: Unlocking the true value of our Energy Union to secure affordable, efficient and clean energy for all Europeans

[22] To learn more about the Paris Agreement, visit the United Nations' page on Climate Change.

[23] To learn more, visit the page on the New Collective Quantified Goal on Climate Finance.

[24] To learn more, visit the United Nations' page.

[25] To learn more, visit the United Nations' page on the Gender Action Plan.

[26] See the UN file (PDF) 'Work programme on just transition pathways referred to in the relevant paragraphs of decision 1/CMA.4'

In particular, the upcoming revision of the **EU Nationally Determined Contribution (NDC)**[27], due in 2025, must explicitly reference persons with disabilities—not only as a population disproportionately at risk from the impacts of climate change, but also as essential stakeholders whose knowledge, experience, and leadership must inform climate policy and action.

It is important to note that the current EU NDC includes references to human rights, gender equality, and the rights of Indigenous Peoples, but does not mention persons with disabilities. This gap must be addressed to align with the EUs commitments under the **UN Convention on the Rights of Persons with Disabilities (CRPD)**.

Recommendations

We recommend the following actions to EU policymakers to ensure that the upcoming international and EU climate policies are inclusive of persons with disabilities:

Get persons with disabilities at the climate action table!

Closely consult and actively involve persons with disabilities and their representative organisations within disaster risk management and climate-related decision-making at the international, European, national and local levels, in line with Articles 4.3 and 33.3 of the UN Convention on the Rights of Persons with Disabilities (CRPD):

- Ensure mandatory inclusion of persons with disabilities and their representative organisations in the upcoming **Implementation Dialogues**, to assess how the Green Deal is impacting persons with disabilities across different sectors and to identify the specific challenges they face.
- Strengthen the representation of persons with disabilities within the **Climate Pact Ambassadors** by introducing a dedicated profile for Disability Ambassadors in the next call, following the successful model established for Youth Ambassadors.
- Ensure involvement of persons with disabilities and their representative organisations in all relevant EU level policymaking and consultations such as **EU Climate Pact** and the **European**

[27] Read the 2020 update of the nationally determined contribution of the European Union and its Member States.

Climate and Energy Dialogue and **Nationally Determined Contribution to the Paris Agreement**.

- Support the **establishment of an official Disability Constituency within the UNFCCC mechanism** to ensure the formal inclusion of persons with disabilities and their representative organisations in global climate negotiations.

Research and document the situation of all persons with disabilities across sectors

To fully understand the impact of climate change on persons with disabilities, comprehensive data collection and analysis are essential. This research must consider the diversity within the disability community and include intersectional factors such as age, gender, race, ethnicity, indigeneity, and migration status, with the goal of strengthening inclusive climate action and societal resilience.

- Conduct detailed, disaggregated research on how climate change affects persons with disabilities across different demographic groups and sectors.
- Document the ways in which disability inclusion can contribute to greater climate resilience and more effective policy outcomes.

Mainstream the rights of persons with disabilities in international and EU policies and programmes related to climate action

The EU should implement accessible, inclusive green and sustainable climate policies and practices in line with the CRPD and prioritise disability rights across all climate actions—both within and beyond its borders—including in areas such as funding, green economic transitions, consumer access, education, and international cooperation.

- **Do not allow the upcoming review of EU corporate reporting rules, or other potential future legislation, to weaken the hard-won progress regarding the rights of persons with disabilities.** Through its three "Omnibus proposals" [28] the European Commission aims to simplify regulations for companies, including in sustainability reporting. However, simplification must not come at the expense of accountability—especially when it risks enabling companies to avoid reporting on actions that affect persons with disabilities or other groups at risk. The Council and the European Parliament

[28] See European Commission Work Programme 2025, p.2

must urgently demonstrate leadership by rejecting these harmful proposals of the European Commission.[29]

- **Include disability provisions related to accessibility and skills in the clean industrial investments of the EU** of the new post-2027 Multiannual Financial Framework, supporting accessible products, services, technologies, transport, infrastructure, education and lifelong learning.
- **Identify and address the specific risks faced by persons with disabilities in the upcoming European Climate Adaptation Plan[30] and Nationally Determined Contribution**[31] with dedicated measures to protect and rescue persons with disabilities from climate-related disasters and their consequences on infrastructure, energy and livelihood.
- **Ensure disability inclusion in the 2025 revision of the EU Nationally Determined Contribution (NDC)[32],** by including concrete commitments to disability-inclusive mitigation, adaptation, and climate finance measures, in line with the EU's obligations under the UN Convention on the Rights of Persons with Disabilities (CRPD) and the Paris Agreement.

Finance disability-inclusive climate action

Persons with disabilities are among those most at risk from the impacts of climate change, particularly in countries that are most affected by its consequences. To promote climate justice and global inclusion, the EU must ensure dedicated climate finance, targeted projects, and capacity-building support for persons with disabilities and their representative organisations in third countries. This not only strengthens local resilience but also allows others to benefit from the EU's inclusive best practices.

- **Embed disability-related best practices in the EU's climate diplomacy** to set a global standard and maximise the social impact of EU foreign aid and strategic initiatives. Successful examples from disability-inclusive projects funded by the Just Transition Fund or the European Social Fund Plus[33] can serve as models, demonstrating how green policies can be leveraged to enhance

[29] For more information, please read the Joint Civil Society Organisations' statement reacting to Commission Omnibus publication.
[30] The new European Climate Adaptation Plan is to be published in the second half of 2026.
[31] European Union Nationally Determined Contribution 2023.

[32] Read the 2020 update of the nationally determined contribution of the European Union and its Member States.
[33] Read more about the European Social Fund Plus (ESF+)

accessibility, build skills, and promote the inclusion of persons with disabilities worldwide.

- Ensure that **disability inclusion and accessibility are core principles in climate investments** in third countries, particularly within the Team Europe and EUROCLIMA+ initiatives. This should apply across all relevant sectors—especially transport and buildings—to guarantee that green infrastructure and development efforts are inclusive and accessible to persons with disabilities.

Conclusions

The green transition launched under the European Green Deal represents a profound transformation of Europe's economy and environment—and it holds significant potential to address social inequalities as well. Persons with disabilities are among those most affected by climate change, often experiencing "eco-ableist" responses that overlook their requirements and undermine their rights. These challenges are even more severe for persons facing intersectional discrimination, including girls, women, children, older persons with disabilities, as well as those who are gender non-conforming, Indigenous, racialised, or people of colour with disabilities.

While the Green Deal has introduced some disability-inclusive measures—particularly in improving accessibility in transport, buildings, and employment—persons with disabilities remain significantly underrepresented in climate decision-making processes and public engagement platforms, such as the flagship Climate Pact. In this context, the European Commission's commitment to expanding civil society participation in the implementation of EU policies presents a key opportunity to address this gap and ensure more inclusive governance.

As the Green Deal moves from planning to implementation, it will require continuous monitoring, targeted funding, and adaptive measures. Whether its policies effectively serve persons with disabilities will only become clear over time. This makes it essential to ensure the active involvement of persons with disabilities and the representative organisations from the outset. Their meaningful participation must be supported through dedicated capacity-building, financial resources, and accessibility measures, so they can shape a green transition that truly works for everyone.

This broader effort toward inclusive climate governance also intersects with other EU-level commitments, such as the forthcoming revision of the EU Nationally Determined Contribution (NDC) under the Paris Agreement. While the current NDC includes references to human rights, gender, and

Indigenous Peoples, it omits any mention of persons with disabilities. The way in which the next NDC addresses this gap—alongside the implementation of Green Deal measures—will be a key test of whether the EU's climate ambition is matched by a commitment to human rights and inclusion. Together, these frameworks will determine whether the green transition advances not only environmental sustainability but also the rights and dignity of all people, including persons with disabilities.

Document credits

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