ANNEX TO NOTE VERBALE 10/2025
INFORMATION FROM THE GOVERNMENT OF BRAZIL

With regard to the communication CESCR/2024/43/GCSD, dated October 24th 2024, from the Committee on Economic, Social and Cultural Rights concerning the request for contributions to the CESCR general comment on economic, social and cultural rights and the environmental dimension of sustainable development, the Government of Brazil would like to submit the following.

I - Information from the Ministry of Human Rights and Citizenship of Brazil

I.I. Elderly Population

Regarding the rights of the elderly population, the Ministry of Human Rights and Citizenship of Brazil suggests that this topic be included in the document to highlight the obligations of States in ensuring the economic, social, and cultural rights (ESCR) of this group, especially in light of the climate and environmental crisis. Considering the need to identify vulnerable groups, the challenges they face, and the possibilities for mitigating these issues, we suggest explicitly mentioning elderly people in the document, particularly under the following sections:

- "Protection of the Family" (Art. 10);
- "Right to the highest attainable standard of physical and mental health" (Art. 12);
- Section V, "Implications for disadvantaged individuals and groups."

It is important to recognize the need for implementing mitigation measures for the climate crisis across all vulnerable population segments, including the elderly. Acknowledging the specificities of this group facilitates the development of actions to guarantee their rights.

In Section V, which addresses implications for disadvantaged individuals and groups, we propose including elderly people as another group disproportionately affected by the global environmental crisis. The vulnerabilities experienced by the elderly population can manifest in various ways, including social, economic, geographic, physical, and health-related aspects, among other factors.

Elderly people are particularly vulnerable to environmental changes and exposure to risks and natural disasters. In the Guidance Manual for Elderly People in Risk and Disaster Situations, prepared by the Secretariat of the Ministry of Human Rights and Citizenship of Brazil, it is highlighted that, given the increasing frequency of natural disasters in Brazil and the complexity involved in these events, it is essential to implement practical measures that enhance preparedness, mitigation, and response capabilities to risks and disasters. This need is even more urgent for vulnerable groups. In this context, elderly people have characteristics that make them particularly exposed in risk situations. Aging can impact their functional capacity, reducing risk perception, alertness, attention, and mobility. Moreover, residing in risk areas exacerbates their vulnerability.

In risk and natural disaster situations, certain characteristics can increase the vulnerability of some elderly individuals. These characteristics include: reduced mobility; chronic illnesses; social isolation; cognitive issues; residence in risk-prone areas; poverty; low literacy levels or difficulty accessing information and communication; living in remote communities. These factors can impair their ability to protect themselves and respond effectively in emergencies.

Why is it important to know actions to prevent risk situations and disasters? Understanding these actions enables people to prepare and protect themselves as effectively as possible.

Considering the section on the right to physical and mental health, the Ministry of Human Rights and Citizenship of Brazil also recommends explicitly mentioning vulnerable populations, including the elderly. To achieve more inclusive results in combating environmental threats that disproportionately affect different populations, safeguarding the right to physical and mental health requires long-term investments in an extensive healthcare network capable of addressing the diverse needs of these groups.

Additionally, the Ministry of Human Rights and Citizenship of Brazil proposes including actions aimed at ensuring the full exercise of professional activity with dignity and safety, respecting the characteristics and individuality of elderly people in rural, urban, and forest areas, promoting solidarity and sustainable economies. Furthermore, the Ministry of Human Rights and Citizenship of Brazil suggests taking measures to strengthen community ties, cultural appreciation, and the preservation of memory and ancestry. By explicitly including elderly people among the vulnerable groups targeted for structural actions to protect them, it is essential to consider their historical, social, ethnic-racial, economic, territorial, cultural, and religious diversity to effectively implement these measures.

I.II. Environment and Human Rights

Actions to ensure the “right to decent work, with fair and adequate conditions, including social security” are very important to the implementation of to public policies aimed at effectively reducing inequalities, especially racial and gender inequalities, and to the establishment of international agreements on assistance and cooperation” responsibly developed and conducted by the parties involved.

To combine economic, social, and cultural rights with the environmental dimension of sustainable development, it is crucial to promote and urgently apply models better adapted to current planetary needs. This includes a just transition, particularly in areas such as food production, natural resource extraction, industrialization, and fossil fuel usage.

Addressing the current environmental crisis requires a multidisciplinary perspective. The "Risk Society Theory" highlights awareness of the exhaustion of the classical production model, evolving toward a risk society that necessitates adapting legal mechanisms to this new social reality. This underscores the relevance of prevention and precaution as guiding principles in this process. The risk society imposes on the state the obligation to manage and mitigate the

proliferation of threats. Public participation mechanisms tied to democratic regulatory processes are indispensable in this context.

The 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs) form a multidimensional framework that interrelates actions to combat the environmental crisis and global climate change. Addressing the SDGs highlights the necessity of confronting inequalities—racial, gender, socioeconomic, and intersectional (such as age groups like the elderly, children, and adolescents, as well as people with disabilities)—to advance in tackling the climate crisis.

Progress in the International Environmental Agenda demands collective efforts to redefine priorities and rethink practices toward inclusion and genuine sustainability. This future will be achieved when issues of racial, gender, and socioeconomic justice are treated as indispensable, interdependent components of an inclusive and fair approach to the environmental and climate crisis.

I.III. Defence of Democracy, Memory, and Truth

Concerning the defence of democracy, memory, and truth, the Ministry of Human Rights and Citizenship of Brazil suggests including fundamental rights to memory and truth as foundational principles of human and sustainable development. Although these rights are not explicitly mentioned in the document (4623019), they align with themes in Section V, "Implications for Disadvantaged Individuals and Groups," which refer to the preservation and transmission of cultural heritage (paragraph 91) and the essential protection of indigenous peoples (paragraphs 83–85), as well as artisanal fishers, farmers, and pastoralists (paragraphs 86–90).

An importance reference is the "UN General Assembly Resolution 68/165 - “The Right to Truth", adopted on December 18, 2013. This resolution emphasizes the importance of the right to truth in cases of severe human rights violations and violations of international humanitarian law.

Resolution 68/165 of 2013:

- Reaffirms every person's right to know the truth about gross violations of human rights and severe violations of international humanitarian law, to end impunity and promote and protect human rights.
- Recognizes the importance of respecting and guaranteeing the right to truth for the full realization of human rights and recognizes it as an autonomous right.
- Encourages states to respect and guarantee the right to truth, adopting appropriate measures to implement national mechanisms, in line with international obligations, to investigate and address gross human rights violations and severe violations of international humanitarian law.

The right to memory and truth is closely linked to the environmental, economic, and social sustainability dimensions. In this regard, "UN Resolution 76/300", adopted on July 28, 2022, declaring a clean, healthy, and sustainable environment a human right. The Ministry of

Human Rights and Citizenship of Brazil points out the human right to memory, connecting it to the environmental dimension of sustainable development. To protect the right to a clean, healthy, and sustainable environment, much can be learned from the knowledge of indigenous peoples.

The human right to memory involves recognizing and preserving a people's or community's history, culture, identity, and experiences. This right ensures historical facts, traditions, and cultural knowledge are transmitted and respected, avoiding erasure or distortion. It is fundamental to human dignity, identity, and cultural diversity and essential for protecting historical, environmental, and cultural heritage.

Environmental preservation is intrinsically linked to memory, ensuring future generations access to natural resources, landscapes, and traditions that constitute our identity. Preserving memory sites such as environmental reserves, archaeological sites, or natural landscapes symbolizes collective memory and safeguards history and culture. Traditional peoples and communities possess unique knowledge about sustainable nature management through ancestral practices. These practices contribute to environmental preservation and the survival of these communities.

States are also obligated to regulate, monitor, and restrict the impact of large enterprises, especially extractive industries that destroy natural areas, historic sites, and force the displacement of these communities.

Finally, the protection of memory and its sustainable environmental dimension is essential for combating racism, racial discrimination, xenophobia, and intolerance. These goals align with economic, social, cultural, and environmental rights and are addressed in paragraph 12 of the draft general comment "Sustainability is a human rights principle applicable to all economic, social and cultural rights, and is grounded in obligations of progressive realization, non-regression, and non-discrimination."

We propose adding a recommendation from the "Durban Declaration" of the World Conference against Racism, which recognizes the right to memory in paragraph 98: "We emphasize the importance and necessity of teaching humanity's historical truths from antiquity to the recent past, as well as teaching the facts, causes, nature, and consequences of racism, racial discrimination, xenophobia, and related intolerance to achieve broad and objective knowledge of past tragedies." This reaffirms that guaranteeing the human right to memory prevents racial and environmental violations. Knowing the past is essential for preventing the repetition of racism and protecting the environment by safeguarding memory sites and traditional communities. The right to memory demands access to and preservation of traditional knowledge and the environment, advocating anti-discriminatory education with a reconciliatory perspective to ensure non-repetition.

I.IV. Children and Adolescents

Regarding the Rights of the Child and Adolescent, the analysis of the Draft General Comment (4623019), in its section dedicated to Family Protection (Art. 10), includes provisions

(Art. 10) that recognize the particular vulnerability of children and adolescents, especially in the context of environmental harm—a situation that severely affects children under five years of age. It also acknowledges the risks stemming from malnutrition and limited income opportunities for families, which can lead to increased occurrences of child labour, school dropouts, domestic violence, and risks to children's mental health. Additionally, it highlights how environmental crises can amplify the factors driving child marriage and other associated forms of violence.

In this context, the document recommends that:

- States should implement environmental safeguards to eliminate children's exposure to toxic substances and pollution and ensure their right to the highest attainable standard of health;
- States should adopt child-sensitive, rights-based, multi-sectoral, inclusive, interdisciplinary, science-based measures consistent with relevant international guidelines to ensure the full and effective enjoyment of children's rights. These measures should include long-term risk assessments for children. In such assessments, children have the right to be heard and participate;
- States should develop protective mechanisms to guarantee the participation and inclusion of children and adolescents in decision-making processes affecting their future. When children become human rights advocates, their status as human rights defenders must be duly recognized.

Thus, it is understood that the document addresses, albeit not exhaustively, the main issues and challenges related to the rights of children and adolescents concerning economic, social, and cultural rights and the environmental dimension of sustainable development, within the limits set by the draft. Nevertheless, as stated in General Comment No. 26 (2023), "on children's rights and the environment, with a special focus on climate change", by the UN Committee on the Rights of the Child, the application of a child rights-based environmental approach requires full consideration of all children's rights, as outlined in the Convention on the Rights of the Child and its Optional Protocols. Therefore, the following considerations are made:

According to Article 2 of the UN Convention on the Rights of the Child (CRC), States Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment based on the status, activities, expressed opinions, or beliefs of the child's parents, legal representatives, or family members. Considering that environmental risks disproportionately affect certain groups of children, particularly indigenous children, those belonging to minority groups, children with disabilities, and children living in disaster-prone or climate crisis areas, it should be included in item 60 that the measures adopted by States should protect and guarantee the right to non-discrimination.

Additionally, as environmental issues significantly impact children and adolescents, the principle of the best interests of the child (Art. 3 of the CRC) should be considered as a preliminary factor in the adoption and implementation of any measures, including laws, regulations, policies, standards, guidelines, plans, strategies, budgets, international agreements, and development assistance.

If significant impacts on the rights of children and adolescents are identified, it is recommended that a detailed analysis be conducted to assess and determine whether the measures to be implemented are genuinely aligned with the principle of their best interests, in accordance with General Comment No. 26 of the Committee on the Rights of the Child.

I.V. LGBTQIA+ Persons

Brazil is making progress regarding its state obligations by establishing the "National Secretariat for the Rights of LGBTQIA+ People", under the Ministry of Human Rights and Citizenship (MDHC). MDHC Ordinance No. 756 established the "National Strategy for Combating Violence against LGBTQIA+ People". This fundamental document outlines guidelines for collaboration between different levels of government and civil society in addressing structural violence against this population group. The strategy includes intersectoral and specific actions such as expanding support networks, training professionals for humane care, and creating indicators to monitor and evaluate the effectiveness of public policies aimed at the LGBTQIA+ population. These measures are essential to combating discrimination, reducing vulnerability, and ensuring the promotion of human rights, particularly in contexts of systemic violence.

The anti-discrimination measures established by the "National Strategy for Combating Violence against LGBTQIA+ People" directly align with Article 2.2 of the draft General Comment on Economic, Social, and Cultural Rights and the Environmental Dimension of Sustainable Development, which addresses non-discrimination in guaranteeing rights to historically disadvantaged and marginalized populations, including the LGBTQIA+ population. The National Strategy also relates to this article as it promotes the fight against systemic patterns of marginalization, discrimination, and racism, while prioritizing populations that are rendered invisible and disproportionately affected by climate change.

Furthermore, the "Acolher+" Program ("Welcome+"), regulated by MDHC Ordinance No. 755, dated December 5, 2023, seeks to strengthen LGBTQIA+ Shelters across Brazil by providing financial, technical, and institutional support to civil society organizations. The program fosters receiving with dignity, integrating public policies on health, employment, and culture. Initiatives such as the "1st National Meeting of LGBTQIA+ Shelters" underscore the MDHC's efforts to improve services and create cultural spaces that also function as pillars of citizenship. Simultaneously, partnerships with Fiocruz Foundation and local governments facilitate diagnostics and the implementation of innovative shelter models.

The actions of the "Acolher+ Program" align with "Article 9", which pertains to social security, particularly in relation to health and social assistance measures, promoting humane reception and access to public health and social care networks for vulnerable populations.

The "Bem Viver+" Program ("Live Well+"), established by Inter-ministerial Ordinance MDHC/MPI/MIR No. 1, dated December 3, 2024, aims to combat violence and promote human rights in rural, water, and forest territories. Adopting an intersectional approach, it serves LGBTQIA+ peasant, indigenous, and quilombola communities, among others, recognizing

their cultural specificities. Through training human rights defenders, regional meetings, and strengthening local networks, the program promotes self-care practices and violence-free territories. Events such as the "1st Guarani-Kaiowá Indigenous LGBTQIA+ Meeting" and the "1st LGBTQIA+ Meeting of Rural, Water, and Forest Communities in the state of Espírito Santo" highlight the positive impacts of this policy.

In this context, the "Bem Viver+ Program" aligns with Section V of the draft General Comment (Implications for Disadvantaged Individuals and Groups), which targets indigenous peoples, as well as peasants, shepherds, and fishers, particularly landless peasants, agricultural workers, and rural women—groups that face significant discrimination in accessing economic, social, and cultural rights.

Finally, the national program "Empodera+" ("Empower+") promotes dignified work and income generation for LGBTQIA+ people in situations of social vulnerability. Using innovative methodologies, it aims to ensure equity in access to opportunities and foster a path to autonomy. By promoting dignified work and income generation, this program reinforces a right enshrined in Article 6 of the General Comment, which addresses the right to work, with a focus on employment generation, vocational training, and retraining programs designed to help workers secure new employment.

I.VI. Promotion and Defence of Human Rights

Regarding the theme of the Promotion and Defence of Human Rights, the following topics from the draft General Comment are of special interest: a) the right to work (Art. 6), paragraphs 48 to 50; b) the right to just and favourable working conditions (Art. 7), paragraphs 51 and 52; c) the right to form and join trade unions (Art. 8), paragraph 53; and d) the right to social security (Art. 9), paragraphs 54 to 57.

The first three topics reduce the concept of work to employment, failing to address other possibilities, such as associative work through self-managed enterprises. It would be appropriate for these topics to emphasize the importance of States and international cooperation supporting these solidarity economic enterprises as alternatives to unemployment and social exclusion, which are expected to worsen due to global environmental crises. These enterprises have demonstrated significant success worldwide, particularly through projects focused on popular and solidarity economies.

This support is particularly crucial when considering the right to development for rural populations. It is well known that such crises tend to adversely affect the working and production conditions of these populations. Paragraph 26 of the draft general comment underscores this concern, stating:

"Natural resources and their use contribute directly to the realization of economic, social and cultural rights, including through the provision of clean drinking water, clean air and fertile soil for producing food and the protection of ecosystems. Access to land and other natural resources needs to be managed sustainably, including by supporting Indigenous and traditional livelihoods and cultural and religious practices and visions, to contribute to the enjoyment of Covenant rights".

However, this concern specifically addresses indigenous and traditional populations, focusing on livelihoods, cultural and religious practices, and worldviews. Consequently, it overlooks millions of farmers and rural workers who, even though they may not yet face the severe impacts of anticipated global environmental crises, already struggle with work and production difficulties due to limited access to land and water.

The United Nations, through the Food and Agriculture Organization (FAO), recognizes that agroecology enables sustainable agricultural development, advances inclusive and efficient food systems, and promotes the virtuous cycle between healthy food production and natural resource protection. It is the ideal form of agriculture for smallholdings, which have contributed minimally to climate change but are disproportionately affected by its consequences.

Therefore, it is suggested that these topics on work (a, b, and c) explicitly address the concerns of rural populations worldwide and adopt a broader perspective on work. This could be included in one of these topics as a paragraph stating:

> "States and international cooperation have an obligation to ensure that their institutions and rural development policies are prepared to address the impacts of extreme climatic events and climate-related disasters on rural production and work. They must be equipped to guarantee the right to development for rural populations in the precarious conditions likely to arise. This preparation requires linking development policies to vulnerability assessments and identifying, as early as possible, rural populations currently in need of support, as well as those likely to require future assistance. For example, smallholders and rural workers who need additional support to address challenges related to global environmental crises must have access to policies and support mechanisms that ensure sufficient access to land and water for production and provide incentives for self-managed enterprises aimed at generating work and income".

This inclusion would reinforce the necessity and commitment to building an inclusive, sustainable, and resilient future for people and the planet, leaving no one behind.

Economic, Social, and Cultural Rights, Public Security, and the Environmental Dimension of Sustainable Development. Additional suggestions regarding specific obligation of States:

Public security is a primary element for the realization of economic, social, and cultural rights (ESCR), as its absence directly compromises access to basic living conditions such as health, education, housing, work, and environmental protection. States are responsible for formulating and implementing public security policies that respect and promote ESCR, creating safe environments, and protecting the most vulnerable communities from violence, exclusion, and other threats.

One of the States' key responsibilities is ensuring that security forces' actions respect ESCR and environmental rights. This includes prohibiting practices such as the destruction of indigenous territories, forced evictions, and environmental damage caused by inappropriate

interventions. Moreover, it is essential to protect environmental activists and human rights defenders from persecution, ensuring their freedom to act and preserving their safety.

States must also protect vulnerable populations from environmental threats. Activities such as illegal resource exploitation, deforestation, illegal mining, and environmental pollution degrade ecosystems and directly impact local communities' living conditions. Effective regulatory and oversight mechanisms are needed to prevent private agents or criminal organizations from violating both ESCR and environmental balance.

Additionally, States must fulfil their obligations through concrete actions, such as implementing training programs for security forces. These programs should emphasize respect for human rights, social justice, and environmental sustainability, preparing agents to act responsibly and conscientiously. It is also essential to integrate public security actions with policies promoting ESCR, such as protecting workers and communities exposed to environmental and social risks.

Principles of equality, participation, and sustainability should guide public security policies. Equality ensures these policies are inclusive, protecting all social groups, particularly those in vulnerable situations, such as indigenous peoples, quilombola communities, and populations in extreme poverty. Participation requires active community involvement in policy formulation and implementation, ensuring their needs are addressed. Sustainability underscores the need to align public security actions with sustainable development goals, protecting ecosystems and promoting practices that reconcile security with environmental preservation.

The integration of public security and environmental protection is equally fundamental. Environmental crimes such as deforestation, illegal mining, and trafficking of natural resources have direct impacts on ESCR, harming not only the environment but also the health, food security, and living conditions of affected communities. States must establish specialized environmental security units to prevent and combat illicit activities compromising sustainability.

Finally, international and regional cooperation plays a crucial role in promoting public security that respects ESCR and the environment. Global partnerships must address transnational environmental crimes and protect communities facing conflicts over natural resources. States should support international programs integrating public security, human rights, and environmental sustainability, reinforcing the importance of joint actions to address these global challenges. By integrating public security, environmental protection, and human rights promotion, it is possible to build more just, secure, and sustainable societies. In this context, the following recommendations are made:

These guidelines emphasize that States have the responsibility to ensure that their public security policies respect and promote ESCR (Economic, Social, and Cultural Rights), protecting the environment as a fundamental pillar of sustainable development. By integrating public security, environmental protection, and the promotion of human rights, it is possible to build fairer, safer, and more sustainable societies. In this context, the following suggestions are made:

A) Regarding vulnerable populations, the environment, and climate change:

i) Acknowledge that displacement caused by natural disasters is a reality and constitutes one of the greatest humanitarian challenges currently faced by States and the international community. In recent years, an average of 25 million people have been displaced annually in the context of disasters, primarily due to the impacts of sudden disasters such as tropical storms, floods, and earthquakes. Most displaced persons in disaster contexts remain within their own countries. However, some cross borders to find safety or seek protection and assistance in another country.

ii) Promote the use of minimum standards of treatment for migrants, residents, or individuals in transit within a third country affected by a natural disaster.

B) Regarding the prevention of internal forced displacement due to disasters:

i) Map areas and communities at risk of displacement, particularly border areas, as well as systematically integrate human mobility aspects into local, national, and regional disaster risk reduction plans, strategies, and policies.

ii) Promote cross-border cooperation and facilitate planning for the use of shared resources, such as river basins and coastal areas, to increase resilience and reduce disaster risks, including the risk of displacement.

iii) Establish public policies on migration as an adaptation measure to climate change, benefiting individuals and groups in vulnerable conditions living in areas highly exposed to environmental degradation and prone to disasters.

iv) Incorporate considerations of disaster-induced displacement into disaster response plans and preparations at local, national, and regional levels. These considerations should include early warning systems, binational contingency planning, simulation exercises, coordination and evacuation mechanisms, reception, and assistance—especially in regions highly exposed to natural hazards and disaster risks.

v) Develop guidelines or frameworks on planned relocation as a preventive measure for reducing displacement risks. This should be considered a last-resort option, aligned with relevant international instruments.

I. VII. Persons with Disabilities

a) Rights Related to Work, Rural Development, and Inclusion of Persons with Disabilities:

The rights to work (Article 6), fair working conditions (Article 7), and freedom of association (Article 8) are addressed in a limited manner, which significantly impacts the protection of human rights for persons with disabilities. It is essential to expand these rights to include:

- Self-employment and cooperative work, with an emphasis on solidarity-based economic enterprises as solutions to unemployment and social exclusion, especially exacerbated by environmental crises;
- Accessibility and inclusion in the workforce, ensuring access to training policies, workplace adaptations, and mechanisms to combat ableism in work environments.

Exclusion of persons with disabilities in relation to the right to work begins with inadequate or lack of access to education, continues with an ableist labour market offering limited positions (often just to meet legal quotas), and extends to non adapted work environments, which become barriers to career retention and progression. As a result, the right to work is often denied, reflected in labour market statistics comparing informal employment rates of persons with disabilities to those without disabilities. Providing inclusive environments and supported employment is key, encompassing a range of actions to enable persons with disabilities to enter the workforce on an equal footing with others, ensuring decent employment opportunities.

Accessibility challenges extend beyond the workplace itself. Persons with disabilities require access to accessible transportation, inclusive hiring processes, and removal of barriers starting from their homes; Thus, the document should adopt a transversal approach to the rights of persons with disabilities, ensuring that employment and development policies are inclusive and accessible.

Key recommendations include:

- Supporting rural populations and persons with disabilities by ensuring access to land, water, and policies that foster job and income generation.
- Recognizing "ableism" as a structural barrier, requiring specific actions from States and international cooperation to promote equal opportunities in work and social life.

b) Right to the Highest Standard of Physical and Mental Health (Article 12):

Intersectionality is a fundamental element in policies promoting this right. Discrimination based on various factors such as race, gender, religion, nationality, disability, sexual orientation, and gender identity occurs across civil, political, social, cultural, and economic domains, including access to health services. Promoting accessibility involves not only physical access, such as accessible routes and transportation to health facilities, but also eliminating existing barriers, e.g., during mental health consultations for non-verbal individuals.

Additionally, the debate on civil capacity and supported decision-making should be considered. A disability does not necessarily impair a person’s legal capacity. Persons with disabilities should be able to marry, form civil unions, exercise reproductive and sexual rights, plan families, and fully enjoy family and community life. Promoting freedom, autonomy, and independence, with legal capacity on an equal footing, even when support is needed, is essential.

c) Public Safety, ESC Rights, and Inclusion of Persons with Disabilities:

Public safety policies must address the specific needs of persons with disabilities, especially in the context of climate disasters and emergencies. Suggested actions include:

- Training security forces to interact with persons with disabilities respectfully and appropriately, particularly during crises.
- Ensuring accessible shelters and emergency services, including resources like sign language interpreters, braille texts, and visual and tactile signage. Social support and protection for affected populations should be integrated with broader social assistance services.

d) Forced Displacement, Climate Change, and Persons with Disabilities:

Persons with disabilities face additional challenges in forced displacements due to natural disasters. The document should emphasize:

- Minimum accessibility standards in disaster response plans, with adapted structures and trained intercultural mediators.
- Public policies ensuring the mobility and protection of persons with disabilities in displacement contexts, preventing discrimination and abandonment.

e) General Recommendations:

The general comment should include a specific section on persons with disabilities in Section V, particularly highlighting the urgency of addressing ableism and reinforcing the responsibility of States to:

- Ensure the full inclusion of persons with disabilities in policies on employment, education, health, and sustainable development.
- Promote awareness campaigns to eliminate prejudices and stigma, recognizing ableism as a human rights violation.

This approach reaffirms the global commitment to leave no one behind, aligning with the principles of the Sustainable Development Goals (SDGs). These contributions aim to ensure that the policies proposed by the General Comment address the needs of the most vulnerable populations, promoting inclusion, sustainability, and equality.

II - Information from the Ministry of the Environment and Climate Change of Brazil

There is a need for a differentiated perspective on the most vulnerable groups, such as family farmers and traditional peoples and communities, as they are the most affected by environmental threats. Additionally, within the context of the climate emergency, emphasis is placed on the scale of land degradation processes and the increase in droughts as a significant factor in light of the associated socio-environmental impacts. According to data from the United Nations Convention to Combat Desertification (UNCCD), it is estimated that by the end of the century, around 5 billion people will live in arid zones. Thus, it is necessary to create strategies to mitigate this process and to strengthen safeguard mechanisms for the most vulnerable populations.