

SCOPING ANALYSIS ON INCLUSION OF PERSONS WITH DISABILITIES IN THE EXTRACTIVE SECTOR



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List of Abbreviations

ASM	Artisanal and small-scale mining
CSR	Corporate Social Responsibility
DEI	Diversity, Equity and Inclusion
LSM	Large scale mining
PwD	Person with disabilities

Inclusion of PwD in the extractive sector

1. Introduction
2. Rationale for Inclusion
3. Status Quo
4. Challenges
5. Opportunities and best practices
6. ASM sector-specific findings
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This chapter presents the objective, methodology and limitations of the present study.

1. Introduction: scoping analysis' objectives, methodology, limitations

Objective: to provide an understanding of the involvement of and challenges faced by individuals with disabilities within mineral supply chains and the current state of the topic of inclusion in the extractive sector.

Methodology

- **literature review** on inclusion of PwD in the extractive sector, identifying main challenges and good practices
- **interviews with four experts in the field:**
 - (1) disability rights activist from Nigeria
 - (2) DEI consultant from Canada;
 - (3) two DEI experts at an international mining industry association

Limitations

- **Limited time** for research under the scope of the study
- **Lack of data** – disaggregated by factors like disability
- **Lack of available literature** about the status quo and challenges, **especially in ASM**



Two strategic decisions:

- (1) only encompass the mining stage of the mineral supply chain, since information on inclusion of PwD in mineral supply chains is very limited
- (2) throughout the report, insights will be provided that are relevant specifically to the LSM sector, (with the exception of section 6)

- Challenges in **reaching interview partners**, especially for insights into ASM and especially PwD who are themselves working in the mining sector
- Contexts differ greatly and **most opportunities and best practices identified are from contexts with more elaborated DEI organisational culture and discourse** (e.g. Canada, Australia, Chile, South Africa, USA, UK), so it is questionable how much they are applicable across the board or in different contexts (e.g. in the field of development cooperation).

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This chapter outlines the moral, legal and business cases to be made for why inclusion of PwD matters in the extractive sector.

2.1 Rationale for Inclusion: Moral case

There is a **moral, legal and business case** to be made for why inclusion of PwD matters in the extractive sector.

Moral case

- “moral imperative to ensure equal access to opportunities” ([Ellix et al, 2023](#)) – relevant in all contexts, but especially in the mining sector, with inherent power inequalities across multiple dimensions.
- connection between just transition (away from fossil fuels) and inclusion: for transition to be truly “just”, it needs to be inclusive.

*“The UN Working Group on Business and Human Rights (2023) has emphasised that in order to ensure the transition is ‘just’, it is critical to recognise the differentiated human rights impacts in the context of mineral extraction for the energy transition. They highlight that ‘meaningful consultation is indispensable’ for rights-based climate action including with ‘women; Indigenous Peoples, with their free, prior and informed consent; human rights defenders; trade unions; young people, as the segment of the population that will bear the brunt of climate change; and at-risk groups, including minorities, LGBTQ+, **persons with disabilities** and people of African descent” (WG BHR, 2023, as cited in [GIZ 2024](#)).”*

2.2 Rationale for Inclusion: Legal and human rights case

Legal and human rights case

- **Inclusive employment legal framework** (encompassing international conventions, national laws, and directives aimed at promoting equal employment opportunities and protecting the rights of PwD in the labor market):
 - Article 27 of the UN Convention on the Rights of PwD requires countries to "promote the acquisition by PwDs of work experience in the open labour market." (United Nations, CRPD, 2006, Article 27)
 - National legislations protecting the employment rights and non-discrimination of PwD: e.g. Americans with Disabilities Act in the USA, Equality Act 2010 in the United Kingdom, Disability Discrimination Act 1992 in Australia...
 - At the EU Level: Employment Equality Directive
- **Human rights and environmental due diligence regulations**, especially relevant for the mineral supply chains:
 - EU Corporate Sustainability Due Dilligence Directive (EU CSDDD)
 - German Supply Chain Due Dilligence Act (Lieferkettensorgfaltspflichtengesetz)
 - while not specifically mandating the inclusion of PwD into the workforce, they do emphasise broader human rights protections, which could implicitly cover discrimination issues, including those related to disability.

Relevance for development cooperation

The Human rights case of the rationale for inclusion is especially reflected in the principles and policies of international and German development cooperation, most notably:

- Inclusion of PwD in the mining sector promotes the **"Leave No One Behind" principle** of the UN Agenda 2030 for Sustainable Development (SDGs), which requires that all individuals, regardless of their abilities, have equal opportunities to participate in and contribute to society.
- Inclusion is one of the central priorities of the **BMZ's Human Rights Strategy for German Development Policy** ([BMZ 2024](#)), the **Feminist Development Policy** ([BMZ, 2023a](#)) and the **Third Development Policy Action Plan on Gender Equality (2023–27)** ([BMZ, 2023b](#))
 - "key role is played by the cross-cutting, cross-sectoral embedding of the feminist development policy approach in all areas of German development cooperation through the "human rights, gender equality and disability inclusion" quality criterion".

2.4 Rationale for Inclusion: Business case

Business Case

Studies show quantifiable benefits to having a diverse, equitable and inclusive organisational culture – and specifically employing PwD ([Clark & Do Couto, 2022](#) & [Ethical Trade Initiative \(ETI\), 2018](#)) – in the following domains:

1. Culture, talent and addressing labour shortages



- Recruiting from a bigger pool and **accessing untapped talent** ([Ethical Trade Initiative \(ETI\), 2018](#)), in the context of the extractive industries facing **critical labour shortages** (confirmed in the interviews, esp. on the case of Canada) ([McKinsey & Company, 2023](#))
- **Improving attraction as an employer:** a US study showed that 80% of workers find inclusion important when choosing an employer, and companies with high DEI alignment have seen 33% increase in job offer acceptance ([Clark & Do Couto, 2022](#))
- **Increasing talent retention:** 39% of workers state they would leave their current organisation for a more inclusive one, while 23% have already left (*ibid.*)
- **Increased employee satisfaction:** Teamwork and morale improve with a diverse workforce, reducing absenteeism and raising satisfaction levels ([Ethical Trade Initiative \(ETI\), 2018](#))

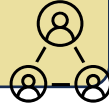
2. Productivity & Performance



- **Enhancing productivity:** PwD often have valuable and diverse skills, which contribute to company efficiency – “less mistakes, better outcomes” ([Ethical Trade Initiative \(ETI\), 2018](#))
- **Improving organizational innovation and agility:** organisations with inclusive cultures are 6x more likely to be innovative, agile and to anticipate change ([Clark & Do Couto, 2022](#))
- **Improving team efficiency:** inclusive teams make decisions 2x faster with half the number of meetings (*ibid.*)
- **Improving overall financial performance:** organisations with inclusive cultures are 2x as likely to meet or exceed financial targets (*ibid.*)

2.4 Rationale for Inclusion: Business case

3. Decision making and safety



- **Better decision-making:** inclusive teams make better business decisions up to 87% of the time, and deliver 60% better results ([Clark & Do Couto, 2022](#))
- **Increased probability of raising issues, including those related to unsafe working conditions,** to management: Inclusive teams see risk reduction by 30% ([Clark & Do Couto, 2022](#))
- Diverse **mining** crews at its sites have a 67% **lower injury rate** than nondiverse teams ([BHP, 2020](#))

4. Reputational advantages and meeting investors' demands in a culture prioritising CSR



- **Improving company reputation:** 44% of executives believe DEI is an essential driver for company reputation ([Clark & Do Couto, 2022](#))
- Relating moral, legal and business cases: there has been a cultural and discursive shift, prioritising diversity and seeing it as a sustainability issue → the need to introduce DEI initiatives is often driven by **investors and shareholder's demands** (confirmed by the interviews)


"In recent years mining firms have attempted to address investor concerns regarding sustainability. The heightened scrutiny accompanying recent transitions in ownership patterns from privately held to publicly traded status have forced several mining firms to prioritize diversity as a sustainability issue." ([Sasikala & Sankaranarayanan, 2022](#))

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This chapter presents an assessment of the current status quo of inclusion of PwD in the extractive sector.

3. Status quo

This section deals with the status quo of PwD in the mining labour force – for an overview of the current situation of employment of PwD generally, as well as most common challenges and a roadmap for inclusive work, see the publication „Making the future of work inclusive of people with disabilities“ ([ILO, 2019](#)). 

- The sector is **historically male-dominated** and **non-diverse** ([Clark & Do Couto, 2022](#)).
- There is a **lack of data**: companies do not track visible minority representation or do not publicly disclose the numbers (*ibid.*)
- Most mining companies' **inclusion measures focus on inclusion of women and ethnic minorities, less often on inclusion of PwD and LGBTIQ+ persons** ([Sasikala & Sankaranarayanan, 2022](#) and confirmed in the interviews).
- Overall assessment of the interview partners is that the topic of inclusion of PwD in the mining sector is a **“beginning conversation”** (interview partner) and much more work is needed. A report analysing the diversity statements and initiatives reported by 25 of the top 50 global mining firms in terms of market value ([Sasikala and Sankaranarayanan, 2022](#)) found that **“a proactive configuration seems lacking in mining, resulting in its failure to deliver on diversity.”** (*ibid.*)



For more information on the Reactive, Defensive, Accommodative, and Proactive (RDAP) Scale framework for describing different levels of CSR, see Clarkson, 1995. For an application of this scale to DEI, see [Sasikala and Sankaranarayanan, 2022](#).



3. Status quo

Where effective DEI initiatives in mining companies do exist, impetus/motivation for them comes from two main sources:

1. Legal compliance with progressive DEI legislation, including targets and quotas:

- a report analysing the diversity statements/initiatives of 25 of the top 50 global mining firms in terms of market value ([Sasikala and Sankaranarayanan, 2022](#)) found a strong correlation between the progressiveness of pro-DEI legislation in the countries where mining companies are headquartered and the maturity of their DEI measures: in context with more progressive pro-DEI legislation (South Africa, Australia, Chile), tend to “address a wider range of diversity dimensions” and “exhibiting greater linkage between their stated diversity plans and initiatives” (*ibid.*, confirmed in interviews)
- in contrast, mining companies in countries with “no discernible pro-DEI legislation in place apart from standard non-discrimination and human-rights laws (e.g., Russia, China and Saudi Arabia)” tend to mostly “pay lip-service to the idea of diversity through vaguely worded diversity statements and superficial initiatives” (*ibid.*).

2. Cultural shift in some contexts,



→ Esp. North America, UK, where there is “an active industry discourse on diversity” ([Sasikala and Sankaranarayanan, 2022](#)), influencing board rooms and investors’ preferences and driving change. An interview partner from a Canadian context talked about a cultural shift, especially since the rise of the Black Lives Matter movement in North America and an awareness of an importance of (racial) justice and diversity, this has informed a greater need for inclusion of various marginalised groups, including PwD – and often this is reflected in investors’ demands.

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This chapter presents a list of the main challenges faced by PwD in the extractive sector.



4. Challenges faced by PwD in the extractive sector

1. Lack of accessibility

- Many workplaces are not physically accessible: “Some mining facilities in Canada are aged and were not designed to modern accessibility standards. For instance, a lack of ramps or elevators can limit access for individuals who are physically unable to climb stairs.” ([MIHR, 2024a](#)).
- “The nature of mining work and the design of controls and working environments can create other barriers. (...) roles that require the ability to discern colours of paint, rock, wiring and control indicators, for instance, may not be open to persons with visual limitations.” (*ibid.*)
- **There is a lack of awareness and incentives in leadership to address barriers:**
 - lower levels of awareness about the benefits of an inclusive workplace among some mining executives (often with engineering or financial backgrounds) (*ibid.*, confirmed by interview partners) → need for education
 - potential costs of accommodating diverse needs can lead to hesitation among leadership (*ibid.*)

2. Remoteness and transportation barriers

- Many mining operations take place in remote areas, making it difficult to provide reliable and accessible transportation (for commuting to and from work) (*ibid.*, confirmed interview partners)
- It also leads to difficulties in providing access to adequate health care in remote areas (which can be especially challenging for PwD, who have complex health needs – source: interview from Canadian context).

3. Legal barriers

- Inadequate enforcement of existing legislations protecting the (labour) rights of PwD
- For example, while many national legislations prescribe quotas for employment of PwD, their implementation is often weak or tokenistic ([Ethical Trade Initiative, 2018](#))
 - Some companies prefer to factor in fines or penalties for non-compliance as a business expense (*ibid.*)
 - “Fake employment” can also be common. This practice involves companies in paying people with disabilities a small regular sum of money to have their names on the official company register, but without actually being required to work. Companies need to check carefully that their suppliers in countries which operate quotas are not avoiding their legal responsibilities and are instead offering decent work opportunities. (*ibid.*, interview partner in Nigeria)
 - A cultural shift is also needed alongside the implementation of quotas. Companies must recognize both the business advantages (see part 2) and the added value of having persons with disabilities (PwD) contribute to the workforce. Myths and stereotypes portraying PwD as weak (source: interview partner Nigeria) need to be dispelled.



4. Challenges faced by PwD in the extractive sector

4. Discrimination, stigma, lack of awareness of employment opportunities in the hiring process

- Limited awareness on the part of PwD as well as employment counsellors and agencies, etc. regarding upcoming opportunities in particular industries ([MIHR 2011](#)):
→ *“Information on career options in primary sectors, including mining, is often lacking in Canada. Career counsellors may not know that the increasing use of automation and new technologies in mining has resulted in a demand for technological skills”* ([MIHR, 2024a](#)).
- Lack of targeted recruiting efforts:
→ *“how to attract talent from groups currently underrepresented in the mining sector is not a top priority for employers who have more cost-effective options. As a result, there is minimal targeted recruitment efforts stemming from the mining sector aimed at persons with disabilities.”* ([MIHR, 2024a](#))
- Hesitation on the part of some PwD to declare their disability and to seek helpful and appropriate accommodation ([MIHR 2011](#)).

5. Discrimination and harassment at the workplace

- Verbal or even physical discrimination still happens to PwD at their job. Intersecting oppressions exacerbate the situation of women with disabilities, which are – like women in mining general ([Government of South Australia, n.d.](#)) vulnerable to sexual harassment and assaults. While specific statistics for the mining sector are not available, it is well documented in some country contexts that PwD generally face wage disparities compared to their non-disabled peers (e.g. for Canada, see [Statistics Canada, 2023](#)).

6. Non-inclusive culture of the workplace

- Many workplace and HR practices, programmes and policies do not meet the needs of PwD (e.g. flexible work hours and locations, accommodation in hiring processes ([MIHR 2011](#), interview partners).
- *“Many employers do not consider this target group due to several factors, including lack of awareness on the part of employers regarding what constitutes a physical disability; the qualifications and capabilities of persons with disabilities; and the degree of effort involved in accommodating and integrating such employees into the workplace”* ([MIHR 2011](#)).

7. Lower Education and Training Levels

- PwD may have had less access to quality education and vocational training because they are facing discrimination and exclusion from the education system
→ this means they would need additional training and educational support to access certain jobs in the sector (*ibid.*).

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This Chapter outlines some of the opportunities and best practices for inclusion of PwD in the extractive sector. It looks at

- (1) what mining companies, as potential employers, can do to include PwD, including some best practice examples from the industry;
- (2) the role of progressive DEI legislation, as well as
- (3) the application of the DEI standards inside institutions. It also looks
- (4) beyond mining companies and governments, at the role of industry groups and associations, trade unions, CRS initiatives and partnerships of business and CSOs. Finally, it discusses
- (5) the role of technology and ends with
- (6) crucial learnings for stakeholders (including development cooperation actors).

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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- **Consult with organisations that specialise in working with PwD:** especially those that themselves employ PwD, as they can offer insights on how to attract and retain more employees with disabilities ([MIHR 2011](#)).
- **Conduct workplace assessments for accessibility:** to ensure a barrier-free office and working environment with accessible facilities (*ibid.*).
- **Make the workplace accessible, and ensuring “reasonable accommodations”** or “reasonable adjustments” (UK terminology): “Making the workplace accessible will be enough to enable many workers with disabilities to function on a basis of equality with other employees. Sometimes, however, a personalised change, such as a different height of chair, an adapted tool or instructions provided in a different format, may be needed. Sometimes it’s a change in working patterns, such as short breaks or moving someone’s workstation to another part of the premises. (...) most reasonable accommodations are simple to achieve. According to a 2017 US report, nearly 60% of reasonable accommodations cost nothing at all, and 36% involve relatively modest one-time costs.” ([Ethical Trade Initiative, 2018](#)).
- **Allow for job modifications:** “Many jobs have been designed with nondisabled people in mind. Changing small elements of a job can make it easier for a person with a disability to do it. For example, moving a heavy box twice a day may be a small part of someone’s job and will take only a few minutes for a person who does not have a mobility impairment. A simple job modification would involve asking a nondisabled person to perform this task, while giving the worker with a mobility impairment something else to do at this time.” (*ibid.*)

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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- **Establish inclusive recruitment practices and create targeted recruitment campaigns:** to ensure that PwD are not discriminated against in the recruitment process. Sharing relevant information in advance can be helpful, e.g. "Mining employers can attract PwD by emphasizing the company's prioritization of health and safety. Sharing information about the availability of a nurse, doctor or other medical personnel onsite in remote operations, the availability (...) medical supports can help clarify whether the measures will be adequate for an individual's needs." ([MIHR, 2024a](#))
- **Implement sensitivity and awareness training for managers, employees and human resources:** to foster an inclusive environment, reduce discrimination and (micro)aggressions towards PwD and ensure a positive work environment for everyone – the education should "including education on appropriate terminology; dispelling myths; communicating with persons with various physical disabilities; and understanding how to be inclusive and how to fully engage the talents of persons with disabilities." ([MIHR 2011](#))

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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- **Use inclusive language:** “While preferred language varies between countries, using terminology that is acceptable to people with disabilities shows respect. How people are described has a major influence on how they are seen; some terms empower, while others reinforce exclusion. There can also be a big difference between language in common usage and the terminology that people with disabilities themselves prefer. The evolution of the terms for “disabled person” in Mandarin Chinese is a clear example. The traditional term is “canfei” (残废), which means “useless person”. The official term, used by the Government, is “canji” (残疾), which means “diseased (or ill) person”. People with disabilities, advocates and companies which support the human rights of people with disabilities now use the term “canzhang” (残障), which implies a person who faces barriers in their life.” When in doubt about the right terminology to use, ask. People with disabilities, DPOs and specialist organisations can explain what local terms are considered empowering.” ([Ethical Trade Initiative, 2018, p. 20](#))
- **Implementation of inclusive work practices, policies and programs** ([MIHR 2011](#)).
- **Think intersectionally:** and encourage e.g. youth with disabilities to enter career in mining, through the establishment of mentorship programs that pair youth with disabilities with successful professionals who share similar experiences can provide valuable role modelling, networking opportunities and career guidance ([MIHR 2024b](#)).

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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- **Create opportunities for individuals with lived experience of living with disabilities to share their experiences:** both among each other (**employee resource groups**), as well as with the management (so concrete improvements and accommodations can be made)
- **Broaden the understanding of disability to include all types of disabilities:** – physical and non-physical; visible and non-visible ([MIHR 2011](#), interview partners)



An **Employee Resource Group (ERG)** is a voluntary, employee-led group that aims to foster a diverse and inclusive workplace. These groups are typically formed by employees who share a common characteristic, such as gender, ethnicity, religious affiliation, lifestyle, or interest.

ERGs provide support, help in personal or career development, and create a safe space where employees can bring their whole selves to work. They often organise regular meetings, special events, and community volunteering initiatives to support their members.

5. Opportunities and Best Practices

What can mining and companies/ employers do?

The role of progressive DEI legislation

Applying DEI standards inside institutions

Beyond mining companies and governments

The role of technology

Crucial learnings for all stakeholders

Best Practice examples from different mining companies*



- *Alcoa*, the world eight's-largest producer of Aluminum, headquartered in the USA, has implemented its mission called "[ABLE](#)" (Alcoans Moving Beyond Limited Expectations), which aims to cultivate a work environment that fosters authentic and lasting inclusion for PwD, increases awareness, and ensures that everyone feels accepted, valued, and treated equitably.



- *Anglo American*, a British multinational mining company, has an [inclusion and diversity \(I&D\) strategy](#), which aims to create and promote an inclusive working environment, including an "Sustainable Mining Plan" which entails an overarching group-wide I&D policy that reflects its commitment to alignment with the ILO core conventions and the UN SDGs.



- *BHP*, an Australian multinational mining and metals company, is committed to fostering a [diverse and inclusive work environment](#) by enhancing workplace accessibility for people with disabilities. In 2023, BHP established the Amber Accessibility and Inclusion Network, an employee-led initiative supported by executive leadership. Amber serves as a platform for employees with disabilities, carers, and allies to connect, share experiences, and provide support. BHP plans to build on this progress by developing a global Disability Action Plan.

* Please note that these examples are based on the respective company's own presentation and could not be verified externally.

5. Opportunities and Best Practices

What can mining and companies/ employers do?

The role of progressive DEI legislation

Applying DEI standards inside institutions

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Crucial learnings for all stakeholders

Best Practice examples from different mining companies*



- *Harmony Gold Mining Company*, a South African gold mining company, has implemented a [Preferential Procurement Strategy and Enterprise and Supplier Development \(ESD\)](#) Framework, meant to increase participation of previously disadvantaged designated groups in the mining industry's economy – which includes persons with disabilities.

Teck

- *Teck*, a Canadian company that is engaged in mining and mineral development, is committed to fostering an inclusive environment, particularly for employees with disabilities. At their Chilean operations, Teck has tripled the number of employees with disabilities since 2020 by providing support, workplace accommodations, and specialised training for supervisors and HR teams. They also promote disability awareness through [various initiatives](#) and have joined Red de Empresas Inclusivas (ReIN) to further their commitment.



- In 2022, *Vale*, a Brazilian multinational corporation engaged in metals, mining and logistics, exceeded the Brazil's legally prescribed quota of 5% disabled professionals in the company. Currently, 5.4% of the workforce is made up of professionals with disabilities, amounting to around 2,700 employees in a wide variety of roles. [Two training programmes](#) called "Empowering Disabled Talents" and "Leveraging Disabled Talents" aim to strengthen skills and personal development as well as develop strategic competencies and leadership skills, in order for the participants to take on more complex positions, with greater responsibility.

* Please note that these examples are based on the respective company's own presentation and could not be verified externally.

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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South Africa

- The **Mining Charter III** requires mining companies to have five-year diversity targets, for representation of Historically Disadvantaged South Africans (HDSA – which includes PwD) and women, against which their performance is reported and tracked ([Sasikala and Sankaranarayanan, 2022](#)).
- The **Mine Health and Safety Act** of 1996, emphasizes the importance of a safe and healthy working environment in the mining sector, which includes the obligation to reasonably accommodate PwD and to prevent workplace injuries that could lead to disabilities.
- The **Skills Development Act** of 1998, aims to develop the skills of the South African workforce, with a specific focus on skills development of PwD. The Act established the Mining Qualifications Authority (MQA), tasked with ensuring that 4% of mining sector employees should be PwD ([Maphosa, 2023](#)).
- In 2021, the MQA developed the **Disability and Reasonable Accommodation Toolkit** ([MQA, 2023](#)), which provides guidance to mining companies on how to include PwD in the workforce.



USA

- The “**Americans with Disabilities Act**” (ADA): unlike other civil rights statutes that simply prohibit employers from discriminating against protected classes of individuals, the ADA requires careful analysis by employers to determine who is protected, whether they can perform the job with or without reasonable accommodations, and which accommodations are required ([Chetlin & Baker 1994](#)).



Chile

The **Workplace Inclusion Law** mandates that PwD should constitute at least 1% of the workforce since April 2020 ([Sasikala and Sankaranarayanan, 2022](#)).



5. Opportunities and Best Practices

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Example: **Disability Access and Inclusion Action Plan 2020 to 2024** of the Department for Energy and Mining of Government of South Australia ([Department of Energy and Mining, n.d.](#)). In South Australia, the Department for Human Services established a policy framework for Disability Access and Inclusion Action Plans in South Australian government agencies through State Disability Inclusion Plan 2019-2023, incorporating the principles in the Disability Inclusion Act 2018 of South Australia and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) – among government agencies that adopted such a plan is also the Department of Energy and Mining, which sets standards for ensuring inclusion, leadership and contributing to government and community decision-making, and accessibility to foster equal participation of PwD in the workings of the Department of Energy and Mining.

→ **Governmental institutions, civil society organisation and international cooperation actors can lead the way by applying high standards for inclusion of PwD in their own organisational structure.**

5. Opportunities and Best Practices

What can mining and companies/ employers do?

The role of progressive DEI legislation

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The role of industry groups and associations

Best practice example at a national level:

- The Mining Association of Canada (MAC) has strengthened its commitment to responsible mining through formulating the **Towards Sustainable Mining (TSM) Standards** ([MAC, n.d.](#)), which requires all members to assess and independently validate their performance across 30 social and environmental indicators. In 2023, MAC introduced the Equitable, Diverse, and Inclusive Workplaces protocol ([MAC, 2023](#)) – the website includes a useful FAQ for mining companies and beyond) after two years of stakeholder engagement. This protocol helps companies develop strategies and processes to promote equity, diversity, and inclusion at mine sites. It was launched alongside updates to the TSM Safe, Healthy, and Respectful Workplaces protocol, which now includes a focus on psychological safety and respectful behaviour in the workplace.
- While this is an example at a national level, it has international impact → TSM is being adopted and implemented by national mining chambers around the world, including in Colombia ([Mining.com, 2021](#)), Guatemala, Mexico, Panama, Brazil, Argentina, Botswana, Australia, Philippines, Finland and Norway.

Best practice example at an international level:

The International Council on Mining and Metals (ICMM), which joins a third of all major mining companies, is taking a strong stance on DEI ([ICMM, 2023](#)). Through its non-binding **Principles and Performance Expectations**, it guides its members in responsible and sustainable mining practices, covering a wide range of issues, including environmental stewardship, social responsibility, and governance. The performance expectations also relate to the inclusion of PwD, as they touch upon workplace accessibility, providing equal opportunities, providing necessary support, and emphasizing psychological safety.



5. Opportunities and Best Practices

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The role of trade unions, CSR initiatives and partnerships of business and CSOs

TRADE UNIONS: can promote disability inclusion as part of their social justice and equality remit: ensuring that the voice of workers with disabilities is heard directly in workplace negotiations; raise disability issues in advocacy and collective bargaining and address the barriers to decent work faced by PwD; work for remediation of discrimination and harassment aimed at workers with disabilities; argue for necessary reasonable accommodations and improved working conditions, and support individual workers with disabilities as necessary; promote equal employment and equal treatment for PwD ([Ethical Trade Initiative, 2018](#)).

CRS INITIATIVES: For example, the Valuable 500, a global initiative focused on promoting disability inclusion within businesses. Notable members from the mining sector include Anglo American, BHP, and Rio Tinto. These companies have committed to integrating disability inclusion into their business strategies and leadership agendas as part of their broader corporate social responsibility efforts. The Valuable 500 aims to transform how businesses view and include persons with disabilities, ensuring that their voices and needs are represented at the highest levels of corporate decision-making ([The Valuable 500, n.d.](#)).

PARTNERSHIP OF BUSINESS AND CIVIL SOCIETY: For example, in 2014, Petra Diamonds (world's third largest producer of rough diamonds) partnered with the National Council for People with Physical Disabilities in Southern Africa (NCPDPSA) to support initiatives aimed at promoting and protecting the rights of persons with disabilities. The collaboration focused on creating awareness, providing advocacy, and enhancing the inclusion of people with disabilities within society and the workplace. This partnership was part of Petra Diamonds' broader commitment to social responsibility and sustainable business practices, aligning with their efforts to foster diversity and inclusion within the company and the broader community ([3S Media, 2021](#)).

5. Opportunities and Best Practices

What can mining and companies/ employers do?	The role of progressive DEI legislation	Applying DEI standards inside institutions	Beyond mining companies and governments	The role of technology	Crucial learnings for all stakeholders
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Role of Technology:

- Technological advances and automation creates more employment opportunities for PwD, though often employment counsellors are not aware of those advances – “growing reliance on technology in mining is calling for talent with skills in computer programming and coding, rather than physical capabilities” ([MIHR 2024a](#)).
- Many work tasks in industrial settings can be shared between PwD and robots
 - E.g. “control robots and drones to investigate unreachable areas or traverse uneven ground.” ([MIHR 2024a](#))
 - Technology can also take on potentially difficult tasks like typing or using a computer mouse (*ibid.*)
- Considerations, presented in the IGF report “Women and the Mine of the Future” ([IIED, 2023](#)), regarding the adoption of “disruptive technologies and digital solutions” (*ibid*) and their impact on women in mining, are likely to have resonance with their impact on PwD.

5. Opportunities and Best Practices

What can mining and companies/ employers do?

The role of progressive DEI legislation

Applying DEI standards inside institutions

Beyond mining companies and governments

The role of technology

Crucial learnings for all stakeholders

- It is crucial for all effective measures for inclusion to **center PwD's rights advocacy and disability justice groups**, especially the ones having expertise on and experience of lived realities of PwD (source: interviews)
 - Listening to their experiences
 - Learning from them
 - Consulting with them
 - Strengthening their capacities (development cooperations) – there is a lot of energy among PwD's rights advocacy, but in many contexts structural support for their actions to be more orchestrated and structurally impactful, is missing (interview partner, Nigeria).
 - Like with women's rights organisations, many PwD might not want to cooperate with actors in mining sector (either this is not their priority (interview partner in Nigeria) or they are afraid it might sully their reputation (interview partner in Canada), so finding points of intersection of interests or finding a common language or incentivising cooperations with meaningful and paradigm shifting actions, could be an entry point.

Inclusion of PwD in the extractive sector

1. Introduction
2. Rational for inclusion
3. Status Quo
4. Challenges
5. Opportunities and Best Practices
- 6. ASM SECTOR-SPECIFIC FINDINGS**
7. Conclusions

This chapter shares a few insights from the (very limited) data source pertaining to the ASM sector.

6. How about ASM? First insights from (very limited) data sources available

ASM Findings

- The toxic environment often characterising ASM can contribute to the onset of disabilities ([Agyei-Okyerea et al., 2019](#)):
 - Chemicals, radiological and nuclear materials used in mineral exploration have longterm health impacts. (*ibid.*)
 - 25%–35% of artisanal miners globally have mercury intoxication and potentially living with severe disabilities. (*ibid.*)
 - A study in Colombia reported high incidence of muscoskeletal and spinal diseases, hearing loss and mental illness among ASM workers. (*ibid.*)
 - Accidents at mines could result in bedridden and disabling conditions among miners, including battling with visual impairments, mine-pit injuries and other respiratory diseases. (*ibid.*)
- While the contribution of mining to onset of disability among miners and individuals in mining communities is known, the living conditions of persons with disabilities in mining communities is unresearched. (*ibid.*)
 - Only two studies were found to document the living situation of PwD: one in mining communities in Ghana (*ibid.*), and the second one focusing on women with disabilities in Nigeria (including both LSM and ASM aspects). ([Arden & Newton, 2022](#))
- The Ghanaian study found that, while PwD do wish to be employed, due to massive unemployment in the area, the PwD are not the ones usually benefit from the (few) employment opportunities generated. Additionally, the mine also replaced agricultural lands, which were previously a source of livelihood for the community (incl. PwD) and now there are reduced livelihood opportunities for PwD, due to a lack of agricultural land.
- The Nigerian study, focusing specifically on women with disabilities, found that it is difficult for women with disabilities to enter the extractive sector or workforce generally, and are largely unemployed and dependant on their relatives.

6. How about ASM? First insights from (very limited) data sources available

Challenges for participation of PwD in the ASM workforce include (from both studies above)

- Many are the same as discussed in LSM above: lack of skills needed to enter the workforce (due to exclusion from education system), unfair employment practices, discrimination, stigma and societal neglect, remoteness of locations, religious and cultural equation of disabilities with weakness ([Arden & Newton, 2022](#)).
- But some are specific to ASM, such as:
 - Illegality of some operations: ASM and related insecurities (criminal banditry) as an additional risk to PwD and deterrent from being included in the sector (reference: both studies).
 - Informality of the sector: less possibility to implement centralised initiatives, however, where policies exist to formalise and regulate the ASM sector, these measures can indirectly benefit all miners, including those with disabilities, by promoting safer and more inclusive work environments (e.g. the ASM Policy of 2022 in South Africa, for example, emphasizes the formalization and regulation of the ASM sector, including ensuring compliance with health, safety, and environmental laws. It also highlights the need for training and capacity-building for ASM miners to meet regulatory standards).
 - Lack of support from government: There are only a few policies and programmes that encourage the participation of women and persons with disabilities in the sector.

Inclusion of PwD in the extractive sector

1. Introduction
2. Rational for inclusion
3. Status Quo
4. Challenges
5. Opportunities and Best Practices
6. ASM Sector – Specific Findings

7. CONCLUSIONS

This chapter offers a summary of the main conclusions and lists potential entry points for further research and/or engagements with the topic of inclusion of PwD in the extractive sector.

7. Conclusions and entry points for further engagement

Conclusions

- Generally the mining sector is not very diverse, where efforts to streamline DEI initiatives do exist, they prioritise gender or racial/ethnic diversity, and less often take specific measures to include diversity of talent as it relates to disability.
- There is a clear lack of data (disaggregated by factors such as disability), and limited sources about the status quo and challenges, as well as best practices regarding inclusion of PwD - this is even more pronounced for the ASM sector.
- Challenges that PwD face range from a lack of awareness and effort to make workspace accessible and ensure reasonable accommodations and necessary job modifications; to discrimination and non-compliance with existing anti-discrimination legislation and legislation protecting the labour rights of PwD; to stigma, non-inclusive work environments and discriminatory hiring practices.
- Where effective DEI initiatives do exist, the impetus for them comes both from legal compliance with the pro-DEI legislation, as well as from a cultural shift, influencing investor's preferences for more just and sustainable business practices.
- When it comes to opportunities and best practices to increase inclusion of PwD into the mining sector, the main change makers include mining companies, governments and legislators, but also industry groups and associations, trade unions and civil society.
- There is a need for learning from, and cooperating with, or even allowing into leadership positions, disability rights' advocacy group and centering the perspectives of those, who have an experience of living/working with disabilities in the mining sector.



7. Conclusions and entry points for further engagement

Entry points for further engagement

1. More research needed – both within LSM and ASM

- Research in LSM could focus on:
 - Better data collection about status quo, as well as impacts of existing DEI initiatives.
 - Impacts, potentials and challenges of technological advancements, as it relates to increasing participation of PwD in mining.
- Research in ASM could focus on:
 - Understanding the position of PwD in the ASM sector – esp. also gathering the perspective of PwD, who have a lived experience of working within ASM.
 - How the regulation and formalisation of ASM (and thereby ensuring better health and safety standards for everyone within the sector) impacts specifically the participation of PwD in the ASM workforce.
 - The potential of cooperatives within ASM to further inclusion of PwD: What good practices already exist? What approaches could be strengthened?

2. More learning from, cooperation with, and seeking consultations from, PwD rights advocacy groups, especially those having expertise of lived experience of PwD.

3. Support capacity building of advocacy groups of PwD, both within mining sector, but also generally, as those groups are often at the forefront of many battles, and mining is not a priority → but if their capacities are strengthened, there is a spill-over effect.

4. Letting PwD advocacy groups and disability justice organisation set the agenda (“nothing about us, without us”).



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THANK YOU FOR YOUR ATTENTION!

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