



# EDF proposed amendments to the revised Connecting Europe Facility (CEF)

July 2018



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## EDF proposed amendments to the revised Connecting Europe Facility (CEF)

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The European Disability Forum is an independent NGO that represents the interests of 80 million Europeans with disabilities. EDF is a unique platform which brings together representative organisations of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.



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## Abstract

- **Accessibility for persons with disabilities is a right** and the CEF needs to reflect this accordingly
- **Objectives:** The objectives of the programme mentioned in Article 3 should also include accessibility as a specific point
- **Eligibility Criteria:** Accessibility for all users, including persons with disabilities, shall remain one of the key eligibility criteria referred to in Article 9
- **Award Criteria:** The award criteria in Article 13 should favour projects that improve and support accessibility; No EU funding shall be granted to projects that promote and sustain inaccessible infrastructure
- **Monitoring:** Accessibility shall be added to the list of key indicators in part I of the Annex

## Introduction

Transport accessibility in the EU is not optional, it is a legal obligation under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) which has been ratified by all EU Member States as well as the EU itself. Therefore, all new and revised EU laws and initiatives as well as funding programmes need to promote accessibility for persons with disabilities, including the Connecting Europe Facility (CEF). Making infrastructure connections accessible throughout the EU will allow more than 80 Million persons with disabilities in the EU to have the same opportunities as everybody else and ensure that they can benefit from the essential EU principle of freedom of movement. Unfortunately, this freedom is still denied to many persons with disabilities in practice and inaccessible transport is one of the obstacles persons with disabilities have to face daily.

In 2012, EDF published its first position paper on the proposal establishing the Connecting Europe Facility (CEF) and accessibility was successfully included in the final programme as well as the TEN-T guidelines. The Commission proposal for the revised CEF builds on this



text and therefore EDF supports the revised text as it stands. However, some further clarification and additions are needed to ensure that EU funding is used correctly to enhance accessibility for persons with disabilities and to avoid that inaccessible projects are funded in the future. Therefore, EDF suggests the following amendments to the text:

### Article 3 - Objectives

| Commission proposal   | EDF amendments   |
|---|--|
| <p>2. The Programme has the following specific objectives:</p> <p>(a) In the transport sector:</p> <p>(i) to contribute to the development of projects of common interest relating to efficient and interconnected networks and infrastructure for smart, sustainable, inclusive, safe and secure mobility;</p>   | <p>2. The Programme has the following specific objectives:</p> <p>(a) In the transport sector:</p> <p>(i) to contribute to the development of projects of common interest relating to efficient and interconnected networks and infrastructure for smart, sustainable, inclusive, <b>accessible to everyone including persons with disabilities</b>, safe and secure mobility;</p> |
| <p>Justification:</p> <p>Making transport accessible to persons with disabilities is an obligation under Art. 9 of the UNCRPD and the CEF should thus translate this obligation by putting accessibility as one of its objectives. Furthermore, accessible transport is a vital condition for guaranteeing freedom of movement for all EU citizens, including persons with disabilities, which is one of the four basic principles of the European Union.</p> |  |

### Article 9 - Eligibility

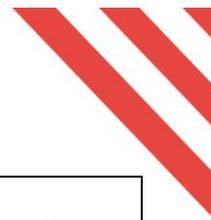
| Commission proposal   | EDF amendments  |
|---|---|
| <p>2.b.(viii) actions improving transport infrastructure accessibility for all users in accordance with Article 37 of Regulation (EU) No 1315/2013;</p> | <p>2.b.(viii) actions improving transport infrastructure accessibility for all users in accordance with Article 37 of Regulation (EU) No 1315/2013;</p> |
| <p>Justification:</p>   |   |



It is important this point is kept because it includes actions improving accessibility for persons with disabilities as well as older persons. In fact, it should even be strengthened by giving priority to projects that improve accessibility for users.

## Article 13 – Award Criteria

| Commission proposal   | EDF amendments  |
|---|---|
| <p>1. The award criteria shall be defined in the work programmes referred to in Article 19 and in the calls for proposals taking into account, to the extent applicable, the following elements:</p> <ul style="list-style-type: none"> <li>(a) economic, social and environmental impact (benefits and costs);</li> <li>(b) innovation, safety, interoperability and accessibility aspects;</li> <li>(c) cross-border dimension;</li> <li>(d) synergies between the transport, energy and digital sectors;</li> <li>(e) maturity of the action in the project development;</li> <li>(f) soundness of the implementation plan proposed;</li> <li>(g) catalytic effect of Union financial assistance on investment;</li> <li>(h) need to overcome financial obstacles such as insufficient commercial viability or the lack of market finance;</li> <li>(i) consistency with Union and national energy and climate plans.</li> </ul> | <p>1. The award criteria shall be defined in the work programmes referred to in Article 19 and in the calls for proposals taking into account, to the extent applicable, the following elements:</p> <ul style="list-style-type: none"> <li>(a) economic, social and environmental impact (benefits and costs);</li> <li>(b) innovation, safety, interoperability and accessibility aspects <b>while paying particular attention to projects explicitly supporting accessibility to everyone including persons with disabilities</b> ;</li> <li>(c) cross-border dimension;</li> <li>(d) synergies between the transport, energy and digital sectors;</li> <li>(e) maturity of the action in the project development;</li> <li>(f) soundness of the implementation plan proposed;</li> <li>(g) catalytic effect of Union financial assistance on investment;</li> <li>(h) need to overcome financial obstacles such as insufficient commercial viability or the lack of market finance;</li> <li>(i) consistency with Union and national energy and climate plans.</li> </ul> |



|   |  |
|---|--|
|   | <p><b>7. (new) The assessment of proposals against the award criteria shall ensure that no proposal is accepted that creates or maintains infrastructure which is not accessible to everyone, including persons with disabilities.</b></p> |
| <p>Justification:<br/>When mentioning “accessibility” in point 1 (b) it should be specified that accessibility for persons with disabilities is meant, not geographical accessibility. Furthermore, projects that actively promote and support accessibility shall be given preference in the assessment in order to properly implement, amongst others, Regulation 1315/2013 and Regulation 1300/2014. It is also crucial to add a new point 7 to prevent EU funding from creating new, inaccessible infrastructure. During the previous funding period it has for example occurred that a bridge was built that was not accessible for persons with disabilities – public money should be used to benefit the EU citizens and not to create new barriers!</p> |  |

## Annex – Part I – indicators

|   |   |
|---|---|
| Commission proposal   | EDF amendments  |
| Indicators:   | <p><b>Indicators:</b></p> <p><b>(new) Number of CEF actions contributing to transport accessibility for persons with disabilities</b></p> |
| <p>Justification:<br/>It is important to collect information about the implementation of the Programme because this has been neglected under the previous CEF. We have thus received anecdotal evidence of funding for inaccessible infrastructure but we were not able to verify this statistically because this information has not been collected. It would be important to do so also to document progress. Therefore, EDF demands that accessibility is added to the list of key indicators.</p> |   |

## Related documents



- [EDF position paper on the proposal establishing the Connecting Europe Facility COM\(2011\)665 and the proposal on Union guidelines for the development of the Trans-European Transport Network COM\(2011\)650 - May 2012](#)

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