



Law

Feedback from: European Disability Forum

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[Apply AI Strategy – strengthening the AI continent \(. /have-your-say/initiatives/14625-Apply-AI-Strategy-strengthening-the-AI-continent\)](#)

^ Feedback from:

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Submitted by	KAVE NOORI
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Country of origin	Belgium
Initiative	Apply AI Strategy – strengthening the AI continent (/info/law/better-regulation/have-your-say/initiatives/14625-Apply-AI-Strategy-strengthening-the-AI-continent_en)

'1. Inclusion as a Strategic Priority Inclusion must be explicitly recognised as a cross-cutting objective. Persons with disabilities experience the extreme positives and negatives of AI and all technologies. We stand to benefit significantly from AI through assistive technologies, accessible services, and enhanced autonomy but only if proactive measures are taken to ensure accessibility and equity. 2.

Public Interest and Non-Commercial AI The strategy should support the development of AI systems that serve the public good, regardless of their commercial profitability. This includes AI applications for accessibility, inclusive education, and independent living. Public funding should prioritise these areas to enhance the quality of life and the services delivered. It is important to acknowledge that AI is a statistical reasoning machine optimised for average individuals, which may result in less effective performance for those outside the norm. Individuals with disabilities often fall outside this statistical norm. Therefore, making AI effective for people with disabilities requires deliberate and proactive measures and methodologies for inclusive design. Similar to how the EU provides European SMEs with an infrastructure for AI modelling training, it is imperative that SMEs are also equipped with knowledge about inclusive design. Additionally, established mechanisms must enable user consultation and testing of ideas and prototypes. Services must cater to diverse demographics, and small, medium, and micro-enterprises should have an equitable opportunity to develop AI solutions that serve all. However, it is unrealistic to expect every micro-business to independently develop infrastructure for structured dialogue with stakeholder representatives, which requires adequate training.

3. *Sector-Specific Considerations*

Health: AI can enhance diagnostics and care, but risks persist. Concerns remain about the European Health Data Spaces lack of meaningful consent. Future data initiatives must ensure informed, accessible, and voluntary participation.

Employment: AI has facilitated inclusive hiring (e.g., accessible job platforms), but also exclusion (e.g., biased screening tools). The strategy must promote inclusive design and auditing of AI systems in recruitment and workplace management.

Migration: AI use in migration should be discouraged due to risks such as unreliable automatic translation affecting lives. Border control and asylum processing systems, if used for assessment, can be dehumanising. While the AI Act allows emotion recognition, it is not reliable; it is pseudoscientific. The Apply AI strategy should discourage its development and use.

Education: AI systems can support students with disabilities if inclusively designed. Language models can explain information in various ways, accommodating different learning styles, provided they are accurate. AI can describe images for those with low vision and assist planning for individuals with

ADHD or autism. Problems arise when tools are not co-designed with people with disabilities or when AI misinterprets normal behaviors, such as overactivity during tests, as cheating. The strategy should encourage developing supportive, not controlling tools. 4. Guidance and Infrastructure for Inclusion We call for EU-level guidance for companies on inclusive AI design and deployment. The Commission should support testing infrastructures that allow companies to consult people with disabilities during development, offering fair compensation. These should be linked to AI Factories, Digital Innovation Hubs, and skills factories. 5. Data Spaces and Consent While data spaces can enhance AI, they must be built on trust, requiring robust safeguards, transparency, and meaningful consent. Accessibility and user control must be embedded by design. We urge the Commission to ensure that the Apply AI strategy serves everyone, including the 100 million Europeans with disabilities.'

[Report an issue with this feedback](https://info.law.better-regulation/have-your-say/initiatives/14625-Apply-AI-Strategy-strengthening-the-AI-continent/F3554530/report_en) ([/info/law/better-regulation/have-your-say/initiatives/14625-Apply-AI-Strategy-strengthening-the-AI-continent/F3554530/report_en](https://info.law.better-regulation/have-your-say/initiatives/14625-Apply-AI-Strategy-strengthening-the-AI-continent/F3554530/report_en)).

All feedback

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Public consultation informing the future Apply AI Strategy

Fields marked with * are mandatory.

Introduction

This consultation aims to gather information about the current state of AI adoption and development in the EU. The different perspectives and priorities identified will inform the EU's forthcoming Apply AI strategy. The Apply AI strategy will aim to boost new industrial uses of AI and improve the delivery of a variety of public services, thereby fostering innovation and competitiveness. The ultimate goal of the strategy is to leverage trustworthy AI to create an enabling environment that: (i) accelerates progress in AI and its adoption; (ii) drives investment and innovation; and (iii) boosts productivity. By connecting and strengthening AI-related instruments, the strategy will serve as a blueprint for the full adoption of AI in EU strategic sectors, thereby strengthening of the Commission's ambition to make Europe an 'AI continent'.

Who should fill out this survey?

This survey is intended for companies, research organisations, civil society organisations, and for EU and non-EU citizens. In the case of organisations, the person replying should speak on behalf of the organisation as a whole. Given the nature of some of the questions, it may be appropriate for chief technical officers (CTOs) or individuals responsible for IT deployment to reply to the survey, as long as they have a global view of the operations of the organisation for which they work.

About you

* Language of my contribution

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- Danish
- Dutch
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* First name

KAVE

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* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority

- Trade union
- Other

*** Organisation name**

255 character(s) maximum

European Disability Forum

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

57868523887-16

*** Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

If you are filling out this form in the name of your organisation, please specify the country of origin of the organisation.

*** Country of origin**

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna

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- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
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- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

General questions

The Apply AI strategy aims to boost new industrial uses of AI and improve the delivery of a variety of public services. The strategy will focus on the integration of AI solutions in key sectors. It will serve as a blueprint for Europe to become an AI continent offering support instruments for the AI value chain as a whole, from chips production to model development up to AI adoption support.

*What are the most important issues on which the Apply AI Strategy should focus?

between 2 and 3 choices

- Europe's innovation and competitiveness
- Technological sovereignty
- Job creation potential
- Social and public good benefits
- Environmental impact
- Ethics and European values
- Safety and security
- Other

* Please provide any specific actions you think should be undertaken at the EU level to address the above

1000 character(s) maximum

Tech sovereignty: The EU and member states should fund the development of a diversity of small open-source AI models, with the goal for them to eventually operate locally on consumer/corporate-grade hardware. People with disabilities should have access to various types of employment, including positions requiring high confidentiality such as lawyers, doctors, or Department of Defense roles. AI tools like speech-to-text and AI assistants can assist them in performing their work efficiently, ensuring they can reach their full potential and are not excluded due to a lack of technology that meets both accessibility and strict confidentiality.

Social and public good benefits: AI Factories and Digital Innovation Hubs should coach small and medium enterprises in inclusive design methodology. They should train user representatives who are compensated for their time and available for consultation by companies on ideas or products.

Questions for consumer organisations, environmental organisations, NGOs, business associations, and trade unions

* How does AI currently impact the work and activities of the stakeholders/entities you represent?

- AI has had minimal or no impact on the workforce in terms of productivity, efficiency and task performance
- AI has enhanced productivity and efficiency, but has not replaced many tasks
- AI has significantly reduced the need for human labour
- AI has created new job roles and opportunities

- AI has changed the task and work allocation without reducing or increasing the number of jobs or human labour
- Other
- I do not have sufficient knowledge to answer

* Please specify:

AI brings the extreme positives and negatives for people with disabilities. It has enabled increased productivity and allowed us to perform tasks that were previously impossible. However, it has also resulted in inaccessibility and exclusion when AI does not accommodate people's needs or disabilities.

If AI is impacting tasks, which ones are affected the most?

Use drag&drop or the up/down buttons to change the order or accept the initial order.

- Administrative tasks
- Analytical tasks
- Customer service tasks
- Problem-solving/Critical-thinking tasks
- Creative tasks
- Technical tasks (including data processing and coding)
- Risk-management tasks
- Project management tasks
- Policy/legal tasks

If AI is creating new job opportunities, for which roles?

- AI engineers
- Data scientists
- AI researchers
- AI ethicists
- AI project managers
- AI policy/Legal experts
- Sector specialists with advanced AI skills
- No AI specific staff but general increase of AI literacy among employees
- Other

* Which actions are you taking to increase AI literacy in the overall workforce and among stakeholders?

- Offering hands-on trainings on how to use AI that the organisation provides or deploys
- Organising workshops and seminars on opportunities and challenges of AI
- Providing resource libraries/written material (e.g. research, briefings, opinion-articles etc) on AI
- Proposing mentorship and peer learning opportunities between less and more AI-skilled workers
- Building community and networking opportunities for AI enthusiasts
- Promoting AI topics via communication and dissemination campaigns
- None
- Other

Contact

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