



# EDF proposed amendments to the AgoraEU programme

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## Table of Contents

Table of Contents .....	2
Introduction .....	2
Media+ strand.....	2
Introduction .....	2
Proposed amendments .....	3
CERV+ strand .....	6
Introduction .....	6
Proposed amendments .....	6
Cross-cutting and horizontal priorities .....	7
Introduction .....	7
Proposed amendments .....	8
EDF recommendations .....	9
Document credits .....	10

## Introduction

### The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation 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.

## Media+ strand

### Introduction

Accessible audiovisual content is a prerequisite to enjoy the right to freedom of expression and opinion, access to information and participation in cultural life. Making audiovisual content accessible allows more than 100 million people with disabilities in the EU to fully participate in society and have equal opportunities

In the EU this is not an option, it is a legal obligation under the UN CRPD, which has been ratified by all EU Member States and the EU itself. As a result, all new and revised EU laws and initiatives, including the Agora EU programme, should promote accessibility for persons with disabilities.

As stressed by EDF on several occasions, despite the existence of EU legislation such as the AVMSD, audiovisual media content remains inaccessible for persons with disabilities<sup>1</sup>. In 2025, the UN CRPD committee concluded that the Audiovisual Media Services Directive lacks timelines and targets for implementation, and does not ensure accessibility of video-sharing platforms, social media, and the audiovisual sections of news websites.

While the Agora EU proposal mentions the rights of persons with disabilities in the recitals 15 and 18 and Article 7 and 8, they mainly refer to the CERV+ Strand (Article 7). Further clarification and additions are needed to ensure that EU funding is used correctly to enhance accessibility in the MEDIA + Strand (Audiovisual).

Therefore, EDF suggests the following amendments to the text.

## Proposed amendments

### Article 3 Programme objectives

Commission Proposal	EDF Amendments
(b) the 'MEDIA+' strand shall: <ol style="list-style-type: none"> <li>i. contribute to the cultural diversity and competitiveness of the audiovisual and video games industries, notably by enhancing creation and cross-border distribution of European content and its access by citizens ('audiovisual');</li> <li>ii. contribute to a free, viable and diverse Union information ecosystem, notably by supporting free and independent journalism and news media, enhancing citizens' access to trustworthy information and tackling disinformation ('news');</li> </ol>	(b) the 'MEDIA+' strand shall: <ol style="list-style-type: none"> <li>i. contribute to the cultural diversity and competitiveness of the audiovisual and video games industries, notably by enhancing creation and cross-border distribution of European content and its access by citizens ('audiovisual');</li> <li>ii. contribute to a free, viable and diverse Union information ecosystem, notably by supporting free and independent journalism and news media, enhancing citizens' access to trustworthy information and tackling disinformation ('news');</li> <li><b>iii. contribute to an inclusive audiovisual industry by ensuring</b></li> </ol>

<sup>1</sup> With the provision of access services: subtitles for the deaf and hard of hearing, audio-description, spoken subtitles and sign language interpretation.

	<b><i>the participation and accessibility of persons with disabilities and other marginalised groups.</i></b>
<b>Justification:</b> Apart from supporting a diverse and competitive audiovisual industry and a free information ecosystem, the programme should also encourage inclusion, equality and diversity for persons with disabilities. This was already the case in article 3 of the <a href="#">Creative Europe Regulation</a> .	

## Article 5 – Media Strand

Commission Proposal	EDF Amendments
<p>Within the MEDIA+ strand, the 'Audiovisual' specific objective shall focus on:</p> <p>(a) supporting the creation of European audiovisual works across multiple formats and genres, with the potential to reach diverse audiences across borders;</p> <p>(b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p> <p>(c) building audiences for European audiovisual works, including through a network of European cinemas, festivals and outreach campaigns, and addressing in particular young Europeans and underserved communities;</p> <p>(d) supporting the development and prototyping of European video games and immersive content, including through market testing, promotion and discoverability audience-driven strategies, and distribution across all platforms;</p>	<p>Within the MEDIA+ strand, the 'Audiovisual' specific objective shall focus on:</p> <p>(a) supporting the creation of European audiovisual works across multiple formats and genres, with the potential to reach diverse audiences across borders;</p> <p>(b) fostering the cross-border circulation, distribution, prominence and visibility of European audiovisual works on all mediums across the Union and internationally, including through coordinated distribution strategies, marketing and promotion tools;</p> <p>(c) building audiences for European audiovisual works, including through a network of European cinemas, festivals and outreach campaigns, and addressing in particular young Europeans and underserved communities;</p> <p>(d) supporting the development and prototyping of European video games and immersive content, including through market testing, promotion and discoverability audience-driven strategies, and distribution across all platforms;</p> <p>(e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and</p>

(e) enhancing talent development, supporting access to finance, business-to-business exchanges and networking, adoption of innovative tools and business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;

(f) fostering policy dialogue, exchange of best practices, data collection and analysis, including the payment of the contribution fee for Union membership of the European Audiovisual Observatory;

(g) contributing to the implementation of Directive 2010/13/EU of the European Parliament and of the Council.<sup>37</sup>

The implementation of the 'Audiovisual' specific objective shall be carried out with full respect for artistic freedom and ensuring collaboration among entities from Member States with different audiovisual capacities.

business models and cross-media intellectual property exploitation strategies, particularly in response to creative, market and technological shifts;

(f) fostering policy dialogue, exchange of best practices, data collection and analysis, including the payment of the contribution fee for Union membership of the European Audiovisual Observatory;

(g) contributing to the implementation of Directive 2010/13/EU of the European Parliament and of the Council.<sup>37</sup>

**(h) supporting the creation of audiovisual media content that is accessible for persons with disabilities, contributing to the implementation of Directive 2018/1808 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities.**

The implementation of the 'Audiovisual' specific objective shall be carried out with full respect for artistic freedom and ensuring collaboration among entities from Member States with different audiovisual capacities.

**Justification:** within the Agora EU programme, the Media + Strand should require specific actions to advance audiovisual media accessibility (audiovisual content that provides sign language interpretation, subtitles for the deaf and hard of hearing, audiodescription and spoken subtitles). The Audiovisual Media Services Directive (AVMSD) provides the legal framework to require such accessibility measures and the AgoraEU should provide part of the funds to support its implementation.

## CERV+ strand

### Introduction

The first assessment of the CERV+ strand of the Regulation is **generally positive**. There is a substantial increase to almost €3.6 billion in the funds dedicated to the CERV+ Strand in the new AgoraEU programme, which is a reasonable sum considering the rising costs of services and inflation.

Disability and implementation of the CRPD are mentioned as a focus area for CERV+ in the Strand on Rights, Equality, Citizens and Civil Society and women and girls with disabilities are also specifically mentioned as part of the DAPHNE programme.

The structure of funding via operating grants is preserved in the CERV Strands, and this is very positive. **Operating grants are crucial for Civil Society Organisations to function** and provide a counter-balance to advocacy from industry and business associations.

However, Civil Society Europe has pointed out in their statement on the MFF<sup>2</sup> that this is not the case for all financing for NGOs in different sectors. We underline how the CERV+ strand and the NRPs cannot be the only funds to structurally support civil society: in many sectors, civil society organisations contribute to sectoral policy-making with their grassroots expertise, and their work should be supported by the programmes covering those sectors.

### Proposed amendments

#### Article 7 (a)

Commission Proposal	EDF Amendments
(a)promoting equality, and preventing and fighting against discrimination on the grounds of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and all forms of racism and intolerance;	Keep this article as is
<b>Justification:</b> Disability rights are human rights and should therefore also be seen in the context of non-discrimination and equality.	

<sup>2</sup> [Civil Society Europe's Reaction to the Multiannual Financial Framework 2028-2034: Progress for Some, Setbacks for Others – Civil Society Europe](#)

## Article 7 (c)

Commission Proposal	EDF Amendments
c) promoting accessibility and protecting and promoting the rights of persons with disabilities, supporting the EU implementation of the UN Convention on the Rights of Persons with Disabilities;	Keep this article as is
<b>Justification:</b> It is important that accessibility and the rights of persons with disabilities are mentioned specifically as this is a big part of the current CERV programme. The UN Convention is the cornerstone of disability rights so it is correctly mentioned here.	

## Article 8 (a) – DAPHNE programme

Commission Proposal	EDF Amendments
(a) preventing, responding to and fighting at all levels all forms of gender-based violence against women and girls, domestic violence, and violence against children, young and older people, LGBTIQ people, persons with disabilities and other groups at risk;	Keep the specific reference to persons with disabilities.
<b>Justification:</b> Women and girls with disabilities are especially at risk of gender-based violence. They should be mentioned specifically as one of the groups at risk.	

## Cross-cutting and horizontal priorities

### Introduction

Cross-cutting and horizontal priorities are essential to all funding under AgoraEU. It is important that inclusion, including of persons with

disabilities, as well as promoting equality and non-discrimination are also recognised as general objectives of the whole Agora EU programme. While it is included under the CERV+ strand (Article 7), it must also be explicitly included under Article 10 of the Regulation.

## Proposed amendments

### Article 10 – Cross-cutting and horizontal priorities

Within the general objectives set out in Article 3, the Programme shall support the following cross-cutting and horizontal priorities and activities:

- (a) cross-sectoral cooperation and innovation across the cultural, media and civic fields, and protection of the integrity of the public discourse, thereby bolstering democratic resilience, societal preparedness and cultural and civic engagement;
- (b) a responsible use of innovative tools and content technologies, notably Artificial Intelligence, as well as skills development and capacity-building through cross sectoral approaches;
- (c) actions for the development, implementation, and monitoring of relevant Union legislation and policy in the culture, media and civic fields, including, where applicable, through cooperation among national authorities and stakeholders.
- (d) in line with the provisions of the Regulation (EU) [XXX]\* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks, thereby enhancing outreach, visibility and the dissemination of the Programme results;

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- (b) a responsible use of innovative tools and content technologies, notably Artificial Intelligence, as well as skills development and capacity-building through cross sectoral approaches;
- (c) actions for the development, implementation, and monitoring of relevant Union legislation and policy in the culture, media and civic fields, including, where applicable, through cooperation among national authorities and stakeholders.
- (d) in line with the provisions of the Regulation (EU) [XXX]\* of the European Parliament and of the Council [Performance], the promotion of the Programme, and its funding opportunities, including through Programme Desks, thereby enhancing outreach, visibility and the dissemination of the Programme results.

The financing of cross-cutting and horizontal priorities and activities shall be determined by their nature and scope.

**(e) actions to create a more inclusive EU, promoting equality and preventing and fighting against discrimination on the grounds of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation, and all forms of racism and intolerance;**

The financing of cross-cutting and horizontal priorities and activities shall be determined by their nature and scope.

**Justification:** inclusion, including of persons with disabilities, should be a general objective of the whole Agora EU programme, not only the CERV+ strand (Article 7). As explained, accessibility of audiovisual content is key for inclusion.

## EDF recommendations

The provisions in the CERV+ Strand as well as the proposed funding amount **should be preserved in the negotiations.**

Additionally, we support Civil Society Europe's position that other programmes outside CERV and the NRPs should also include operating grants and not just action-based grants to properly support civil society organisations.

The **provisions in the Media+ Strand should be improved** to make sure that they also advance audiovisual accessibility and inclusion for persons with disabilities.

**Cross-cutting and horizontal priorities** should explicitly include the promotion of equality and the prevention and fight against discrimination, including under the grounds of disability.

## Document credits

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