



Briefing to the UN Committee on the Rights of Persons with Disabilities: **Disability issues and priorities at the European level**

June 2026

The [European Disability Forum](#) is an umbrella organisation of persons with disabilities that defends the interests of over 100 million Europeans with disabilities. We bring together representative organisation of persons with disabilities from across Europe. We are run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

This briefing aims to inform the independent experts of the United Nations Committee on the Rights of Persons with Disabilities about regional key issues and priorities that directly affect persons with disabilities in the countries under review. We encourage the Committee to take these issues into account during its assessment of European States.

During its upcoming [35th session](#), to be held from 12 to 27 August 2026, the Committee will review the following European countries: **Lithuania**, and **Slovakia** for the adoption of Concluding Observations, and **Latvia** and **Romania** for the adoption of Lists of Issues.

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Contents

Council of Europe.....	2
Hague Convention on the International Protection of Adults – Art. 12 CRPD.....	3
Draft additional protocol to the Oviedo Convention – on forced treatment and placement of persons with psychosocial disabilities – Art. 14 CRPD.....	4
Istanbul Convention on violence against women – Art. 16 CRPD	5
European Union	6
EU Strategy on the Rights of Persons with Disabilities – Art. 4(1) CRPD.....	7
Women with disabilities – Arts 6 and 16 CRPD	8
Accessibility – Arts 9, 11, 20, 21 and 30 CRPD	9
Transposition of the European Accessibility Act.....	9
Implementation of the Web Accessibility Directive	10
Implementation of the Audiovisual Media Services Directive	11
Implementation of the European Electronic Communications Code	12
Ongoing evaluation of regulations linked to transport accessibility	13
Artificial Intelligence: Regulation on artificial intelligence (AI) – Arts 5, 9 and 22 CRPD	15
Humanitarian action, climate and DRR – Art. 11 CRPD	16
Civil protection and humanitarian action	16
Climate action	18
Disaster Risk Reduction (DRR).....	18
Access to justice – Art. 13 CRPD	19
Digitalisation of justice.....	19
Victims and offenders’ rights	19
Independent living: Use of European funds to promote community living and community-based services – Art. 19 CRPD.....	20
Freedom of movement and the European Disability Card – Art. 20 CRPD.....	21
Young persons and youth programmes – Art. 24 CRPD	22
Health – Art. 25 CRPD.....	23
Implementation of the Patient Mobility Directive	23
Guidelines on how to increase access and overcome barriers in access to healthcare for persons with disabilities.....	23
Employment – Art. 27 CRPD	24
Political participation: Right to vote and stand for election in the European Parliament – Art. 29 CRPD	26
International cooperation – Art. 32 CRPD.....	27

Council of Europe

The [Council of Europe](#) is an international organisation founded in 1949 with the aim to uphold human rights, democracy and the rule of law in Europe. It has [46 Member States](#) which have ratified the European Convention of Human Rights and are overseen by the European Court of Human Rights.

It is an entity distinct from the European Union.

All Member States of the Council of Europe ratified the CRPD.

Latvia Lithuania, Romania and Slovakia are among the members of the Council of Europe.

Hague Convention on the International Protection of Adults – Art. 12 CRPD

In 2000, the Hague Conference adopted a [Convention on the Protection of Vulnerable Adults](#). It entered into force in 2009.

The Convention aims to facilitate decisions in cross-border situations in relation to persons who "by reason of an impairment or insufficiency of their personal faculties, are not in a position to protect their interests". In particular, the Convention:

- determines which courts have jurisdiction to take protection measures
- determines which law is to be applied; and who may be a “vulnerable person”
- establishes a system of central authorities which should cooperate, locate “vulnerable adults” and give information on the status of vulnerable persons to other authorities

As of June 2026, **16 European countries** [ratified](#) the Convention: Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Ireland, Germany, Greece, **Latvia**, Malta, Monaco, Portugal, Switzerland and the United Kingdom.

5 countries have signed but not ratified the Convention: Italy, Luxembourg, Netherlands, Poland and **Romania**.

Lithuania and **Slovakia** have not signed nor ratified the Convention.

A risk of the ratification of the 2000 Hague Convention is that its implementation could promote measures of substituted decision making and foster institutionalisation, when countries do not implement it in compliance with the CRPD.

In May 2026, the EU reached an agreement on a **Regulation on Protection of Adults** that establishes new rules to ensure that adults in need of assistance in matters such as medical care, their place of residence, real estate, trade or the management of property and assets will receive more support and better protection in cross-border cases.¹ It is based on some of the rules from the 2000 Hague Convention, but requires Member States to comply with the CRPD. This means that States could refuse to recognise measures that violate the CRPD, for example measures of placement into institution or substituted decision-making regime. The

¹ See [press release from the European Parliament](#).

new law is expected to be published in the EU Official Journal by end of 2026, after which it will enter into force.

More information: [EDF webpage on the protection of adults across borders](#)

Relevant CRPD article: Article 12 - Equal recognition before the law

Suggested questions:

For countries that ratified the 2000 Hague Convention:

- Report on the implementation of the 2000 Convention and cases in which the Convention was used to protect the rights of persons with disabilities and ensure their right to autonomy, legal capacity and free movement.

For countries that **did not** ratify the 2000 Hague Convention:

- Provide information on steps taken to ensure that national measures on the protection of adults, including in cross border situations, are in line with the CRPD.
- Inform whether the State is planning to ratify the 2000 Hague Convention, and which safeguards it will adopt to ensure that implementation is in line with the CRPD.

Suggested recommendations:

For countries that ratified the 2000 Hague Convention:

- Assess the impact of the implementation of the 2000 Hague Convention on the International Protection of Adults on persons with disabilities and their right to autonomy and legal capacity, and abolish any measures that go against the CRPD.

For countries that **did not** ratify the 2000 Hague Convention:

- Ensure that national measures on the protection of adults, including in cross border situation, are in line with the CRPD and recommendations in the EU Council conclusions on the Protection of Vulnerable Adults across the European Union adopted in June 2021.

Draft additional protocol to the Oviedo Convention – on forced treatment and placement of persons with psychosocial disabilities – Art. 14 CRPD

Since 2014, under the mandate received from Member States of the Council of Europe, the [Steering Committee for Human Rights in the fields of Biomedicine and Health \(CDBIO\)](#), formerly the DH-BIO Committee, has been working on a [draft Additional Protocol to the Convention for the protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine](#) (Oviedo Convention). The draft Additional Protocol concerns the protection of human rights and dignity of “persons with mental disorders”. This protocol is based on the medical model of disability and violates the CRPD, creating legal standards for the forced treatment and placement of persons with disabilities and mental health problems in mental healthcare.

In 2022, facing widespread [criticism from civil society](#), [the CRPD Committee](#), [several UN bodies and mandate holders](#), and other [Council of Europe bodies](#), the Committee of Ministers paused the work on the draft Additional Protocol for two

years. During this time, they directed CDBIO to instead focus on developing a [draft Recommendation on respect for autonomy in mental healthcare](#). Civil society, including the European Disability Forum, was actively involved in its development. Civil society [welcomed the adoption](#) of the Recommendation on 17 June 2026.

Following the two-year pause, the Committee of Ministers resurrected their work to advance the draft Additional Protocol in January 2025. Taking the next procedural step towards adoption, they passed it on to the Parliamentary Assembly of the Council of Europe who adopted a [negative opinion](#) on the adoption in January 2026. Despite this opinion, negotiations are taking place in June and July 2026 in the [Rapporteur Group on Human Rights \(GR-H\) of the Committee of Ministers](#) to adopt the protocol, pending formal decision of the Committee of Ministers. There is a significant risk that the draft additional protocol will be adopted. Hence, the disability movement continues to call on European countries to ask for the withdrawal of the draft Additional Protocol, and instead support the recommendation. The recommendation, while not fully CRPD compliant, is not legally binding and aims to prevent and ultimately eliminate the use of coercion in mental healthcare services, outlining important mechanisms for Member States to achieve this aim.

EDF will inform the CRPD Committee on further development that will take place in July, to better inform the recommendations and questions to be adopted in August.

Relevant CRPD article: Article 14 - Liberty and security of person

Suggested questions:

- What efforts are being made toward the withdrawal of the draft Additional Protocol to the Oviedo Convention?
- What efforts are being made to ensure recognition of legal capacity, and the provision of supported decision-making for persons with psychosocial and intellectual disabilities and mental health problems in mental healthcare?

Suggested recommendation:

- Calls upon the State party to support the withdrawal of the draft Additional Protocol to the Council of Europe Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine: Convention on Human Rights and Biomedicine (ETS No 164) (Oviedo Convention) of the Council of Europe, in line with its obligations under article 14 of the Convention, and instead redirect efforts to develop and implement voluntary measures in line with the CRPD.

(See Concluding observations to Slovenia (CRPD/C/SVN/CO/1), paragraph 24).

Istanbul Convention on violence against women – Art. 16 CRPD

The [Council of Europe Convention on preventing and combating violence against women and domestic violence](#) called “Istanbul Convention” was adopted by the Council of Europe in 2011.

It is the first European instrument that aims legally to prevent gender-based violence, protect victims of violence, and punish perpetrators.

Latvia and Romania are Parties to the Convention.²

Lithuania and Slovakia have signed but not ratified the Convention.

More information: [EDF webpage on the Istanbul Convention](#)

Relevant CRPD article: Article 16 - Freedom from exploitation, violence and abuse

Suggested questions:

For States that ratified the Convention:

- Provide information on the steps and timeframe undertaken to ensure the swift implementation of the Istanbul Convention and how the State ensure that those steps fully include women and girls with disabilities.

For States that did not ratify the Convention:

- Provide information on the steps and timeframe undertaken to ensure the swift ratification of the Istanbul Convention.

Suggested recommendations:

For States that ratified the Convention:

- “Recommends that the State party enact legislation, including monitoring mechanisms, to detect, prevent and combat violence within and outside the home of persons with disabilities, especially for women and children with disabilities, and that it produces an action plan to implement the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention), which specifically address women and girls with disabilities.” – as in CRPD Concluding Observations to Italy (CRPD/C/ITA/CO/1)

For States that did not ratify the Convention:

- “Recommends that the State party, without further delay, ratify and implement the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention).” – as in CRPD Concluding Observations to Cyprus (CRPD/C/CYP/CO/1)

² <https://www.coe.int/en/web/conventions/full-list?module=signatures-by-treaty&treatynum=210>

European Union

The European Union (EU) is a unique economic and political union between 27 European countries. The Member States of the EU are Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, **Latvia**, **Lithuania**, Luxembourg, Malta, Netherlands, Poland, Portugal, **Romania**, **Slovakia**, Slovenia, Spain, and Sweden.

The EU has specific competences to adopt legislation in some areas such as common commercial policy, transport, consumer protection, environment and some aspects of social policy, and can support Member States in other areas such as education, culture and tourism.

The two main legislative acts that can be adopted by the EU are **regulations** and **directives**. Regulations are directly applicable in all Member States. Directives need to be transposed by each State in their national law by introducing new legislation or amending existing laws in line with directives.

EU Strategy on the Rights of Persons with Disabilities – Art. 4(1) CRPD

In May 2026 the EU released a plan for [actions for the second half of the EU Strategy on the Rights of Persons with Disabilities for the period 2026-2030](#). This follows up from the [first half of the strategy with actions from 2021-2025](#).

As well as plans for actions at EU level, a number of actions constitute **calls to the EU's 27 Member States themselves**, or a focus on **improvements in implementing the EU legislation and the CRPD at national level**. For the period 2026-2030, these include:

- Encouraging mutual learning on disability assessment methods among the Member States;
- Working with Member States in updating the Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process;
- Encouraging Member States to exchange information, promote data collection and dissemination and raise awareness of factors that contribute or hinder the deinstitutionalisation process;
- Supporting Member States in fostering accessible and inclusive education at all levels, through a life-cycle approach;
- Supporting Member States in developing shared digital infrastructure for education in line with EU values;
- Supporting Member States' implementation of the upcoming Regulation on cross-border protection of vulnerable adults, promoting application in full compliance with the UNCRPD;
- Supporting Member States in increasing the participation of persons with disabilities in culture.

Relevant CRPD article: Article 4(1) - General obligations

Suggested question:

- Provide information on how the State plans to cooperate with the Commission in implementing the actions outlined in the EU Strategy on the Rights of Persons with Disabilities, including by incorporating actions within the national disability rights strategy.

Suggested recommendation:

- Collaborate fully with the European Commission in delivering on the parts of the EU strategy that rely on Member State actions and implementation, set national targets for the implementation of those actions and track progress at national level.

Women with disabilities – Arts 6 and 16 CRPD

In March 2026, the EU adopted a new [Strategy on Gender Equality \(2026-2030\)](#), which is based on the [EU Roadmap for Women's Rights](#) published in 2025. While the Strategy mostly focuses on EU policies, it also requires Member States to take specific actions such as the development of national action plans for preventing and combating violence against women and domestic violence, due by 2029. In addition, the Commission launched its [Action Plan against Cyberbullying](#) and Member States will need to establish comprehensive national anti-cyberbullying policies. The Commission will also support Member States in improving other actions, such as the collection of administrative data on gender-based violence.

The new Strategy for Gender Equality includes [only few mentions to women and girls with disabilities](#) and does not include structural measures or dedicated key actions to address their situation.

In May 2024 the EU adopted its very [first law to combat violence against women](#). The directive requires all EU countries to criminalise female genital mutilation, forced marriage and cyber violence but it failed to ban forced sterilisation and rape. It also requires countries to create aggravating circumstances (including for offences committed against a person with disabilities) and to create accessible and targeted support services for women with disabilities victims of violence.³ Member states have until the 14 June 2027 to transpose the directive at national level.

More information:

- [EDF campaign and report on forced sterilisation in the EU](#)
- [EDF guidance on the transposition of the EU Directive on combating violence against women](#)
- [EDF reaction to the Strategy for Gender Equality \(2026-2030\)](#)

Relevant CRPD articles: Article 6 - Women with disabilities; Article 16 - Freedom from exploitation, violence and abuse

³ <https://www.edf-feph.org/eu-directive-on-combating-violence-against-women-specific-improvements-on-disability/>

Suggested question:

- Provide information on how the State ensures that women and girls with disabilities equally benefit from national strategy on gender equality and strategy on combating gender-based violence.

Suggested recommendations:

- Ensure that the rights of women and girls with disabilities are included under the national strategy on gender equality, in relation to all area of life and adopt targeted measures to implement the recommendations directed at EU Member States in the EU Gender Equality Strategy.

- Take swift measure to ensure that the transposition of the Directive on combating violence against women protect the rights of women and girls with disabilities, and take action to ban forced sterilisation and protect and remedy victims, in line with the CRPD and the Istanbul Convention.

Accessibility – Arts 9, 11, 20, 21 and 30 CRPD

Transposition of the European Accessibility Act

The [European Accessibility Act](#) (EAA) is a horizontal European law (directive) adopted in April 2019 with the aim of making products and services, mainly digital, more accessible for persons with disabilities. The Directive also provides a set of accessibility requirements deemed for public procurement of products and services and the use of EU funds, as well as voluntary requirements concerning the built environment. **Although the deadline for national transposition was June 2022, between January and March 2026 the [European Commission continued infringement actions against several countries](#) including Latvia, for incomplete transposition of the act. The EAA entered into application on 28 June 2025, which means that many products and service must be compliant under EU law.**

In the meantime, the EU continues the standardisation process to develop technical accessibility requirements for all the products and services covered by the Act. These standards will ensure that companies and public authorities know how to fulfil the legal requirements of the Act. The involvement of organisations of persons with disabilities is crucial in the developments of these technical documents, however OPDs experience accessibility, financial, and other barriers for equal participation, as the European and national standardisation procedures are often not inclusive.

More information:

- [Recording of webinar on the transposition of the EAA](#)
- [EDF toolkit on transposition of EAA](#)
- [EDF statement on European Commission's draft standardisation request for the European Accessibility Act](#)

Relevant CRPD article: Article 9 - Accessibility

Suggested questions:

- Please provide information on the transposition of the European Accessibility Act and whether the country went beyond the scope of the directive to fully implement article 9 of the CRPD, in particular by including accessibility requirements for the built environment.

- How is the State ensuring that national representative organisations of persons with disabilities have access to and are meaningfully involved in the standardisation process for the EAA through national standards bodies?

Suggested recommendations:

- Take immediate measures to implement and enforce the national laws transposing the European Accessibility Act. This should include strong enforcement procedures, meaningful cooperation with OPDs, training on accessibility for public official in charge of accessibility legislation and public procurement and financial support for OPDs to participate in standardisation processes.

Implementation of the Web Accessibility Directive

In December 2016, the EU [Directive on the accessibility of websites and mobile applications of public sector bodies](#) entered into force. Since September 2020 all websites of public sector bodies need to be accessible, regardless of when they were created, and since 2021 all mobile applications. Public bodies websites and mobile apps can follow the harmonised **European Standard EN 301 549** to demonstrate compliance with this Directive.

EU Member States must also put in place other provisions in the Web Accessibility Directive, such as adding an accessibility statement in all public sector websites and apps with relevant information for users with disabilities, as well as a link to a feedback mechanism and information about how to complain if the website or app is not accessible. Member States also need to monitor the implementation of the Directive, appoint an enforcement body, raise awareness about web accessibility; and involve persons with disabilities in the implementation and monitoring of the Directive. On December 2022, the Commission published its [evaluation report of the Directive \(executive summary\)](#).

More information:

- [EDF toolkit on transposition of the Directive](#)
- [WAI-CooP project 'Frequently Asked Questions' website on the EU Web Directive](#)
- [EDF article on the Commissions evaluation report of EU Web Directive.](#)

Relevant CRPD articles: Article 9 - Accessibility; Article 21 - Freedom of expression and opinion, and access to information

Suggested questions:

- Confirm whether or not all websites of public sector bodies have been made accessible (as required since September 2020), and that all websites include an accessibility statement.

- Confirm whether or not all public sector mobile applications have been made accessible (as required since June 2021), and that all mobile applications include an accessibility statement.

- Explain any delays in implementation of the Directive and what action is being taken to ensure swift and full compliance.

Suggested recommendations:

- Take immediate action to swiftly implement the Web Accessibility Directive and ensure that all public sector bodies' websites and mobile applications, including those exempted, are accessible, in line with [European Standard EN 301 549](#).

- Ensure the national body tasked with enforcing the Directive is adequately resourced with suitably trained staff to investigate complaints and swiftly take relevant action.

Implementation of the Audiovisual Media Services Directive

The [Audiovisual Media Services Directive \(AVMSD\)](#) (Directive (EU) 2018/1808) was adopted on 14 November 2018. Member States had to transpose it **by 19 September 2020**.

The Directive creates an EU-level framework to coordinate national legislation on all audiovisual media, both traditional TV broadcasts and on-demand services (for example, Netflix, Amazon Video, Now TV).⁴ Article 7 of the Directive specifically obliges Member States to ensure that, without undue delay, services provided by media service providers under their jurisdiction are made continuously and progressively more accessible to persons with disabilities.⁵ This includes public communications and announcements in natural disaster situations.

The Directive sets regular reporting obligations for media service providers to relevant national authorities. Based on the input provided by Member States in 2022 on their implementation of accessibility requirements, [the European Commission published a report in 2024](#). Given the flexibility given by the Directive, the Report shows that only 13 Member States have introduced obligations to provide a proportion of programmes with accessibility features. The Directive will be revised after the summer 2026, but there is no certainty that the accessibility provisions will be strengthened.

More information:

- [Recording of webinar on the AVMSD \(2020\)](#)
- [Article of the second webinar on the AVMSD \(2023\)](#)

⁴ It sets out requirements concerning aspects such as prohibition of hate speech and discrimination based on disability and other grounds, commercial information on TV programs, protection of minors, independence of the national regulatory bodies that monitor audiovisual services, and the promotion of European audiovisual productions

⁵ Nevertheless, the Directive is very general about advancing accessibility, so specific qualitative, quantitative and temporal targets have to be decided at national level. It is therefore very important that Member States take ambitious position to advance accessibility of audiovisual media on the basis of the Directive.

Relevant CRPD articles: Article 21 - Freedom of expression and opinion, and access to information; Article 30 - Participation in cultural life, recreation, leisure and sport

Suggested questions:

- Inform how the State ensures that within this Directive persons with disabilities have equal access to audiovisual media content, including to emergency information and announcements in all forms of audiovisual media, including traditional TV broadcasting, and video on-demand services.

- What measures did the State take to ensure that provision of emergency public information through audiovisual media, including live broadcasting, is accessible to persons who are Deaf, blind, deafblind, persons with intellectual and psychosocial disabilities, and other persons with disabilities who rely on access services to receive crucial emergency information?

Suggested recommendation:

- Set mandatory rules on quantitative and qualitative targets for improving accessibility of audio-visual media content for persons with disabilities.

Implementation of the European Electronic Communications Code

The [European Electronic Communications Code](#) (Directive (EU) 2018/1972) sets an EU-level legal framework to coordinate national legislation on electronic communications networks and services. It was adopted in December 2018 and entered into force on 21 December 2018. Deadline for transposition by Member States was **21 December 2020**.

Among others, the Code aims to ensure the provision of good quality, affordable, publicly available services through healthy competition and choice, to ensure that end-users, including end-users with disabilities, have equal access those services. The Code recognises the right of easy and equivalent access by persons with disabilities to affordable high quality electronic communications services regardless of their place of residence within the European Union.

The Code also obliges Member States to ensure equal access for persons with disabilities to the single European emergency number '112'. In December 2024, the Commission [published a report on the implementation of 112 in EU Member States](#), including on accessibility measures.

On February 2025, the European Commission presented the [Digital Networks Act](#) (DNA), a legislative proposal that would replace the Electronic Communications Code. The disability provisions remain largely unchanged.

More information:

- [EDF Webinar on the European Electronic Communications Code](#)
- [EDF toolkit on transposition of the Code](#)
- [EDF Recommendations on equal access and choice to electronic communications services](#)
- [Ensuring effective access to emergency services in the EU](#)

Relevant CRPD articles: Article 9 - Accessibility; Article 11 - Situations of risk and humanitarian emergencies; Article 21 - Freedom of expression and opinion, and access to information

Suggested question:

- How have you ensured that total conversation⁶ and real-time text services are available to all persons with disabilities and fully interoperable with an adequate level of quality, including when contacting emergency services, as required by the Electronic Communications Code?

Suggested recommendation:

- Take measures to ensure the full implementation of the European Electronic Communications Code in national law, in line with article 9 of the CRPD, including by ensuring that specific terminal equipment or other assistive technologies are made available and affordable to persons with disabilities and that emergency communication are accessible by means of total conversation and real time text, including with the provision of relay services available on a 24 / 7 basis.

Ongoing evaluation of regulations linked to transport accessibility

In 2021, EU has revised its [Regulation on Rail Passengers' Rights \(Regulation 2021/782\)](#) which contains amongst others the provision to provide assistance to persons with disabilities at railway stations and on board of trains. Some improvements have been achieved (lowering of pre-notification time to book assistance lowered to 24h instead of 48h) but it did not go far enough.⁷

In November 2023, the European Commission [presented a proposal](#) to improve enforcement of Passenger Rights Regulations for air, waterborne transport, rail, bus and coach. The proposal includes targeted amendments to Regulation 1107/2006 on the rights of passengers with disabilities when traveling by air, to allow that the accompanying persons, when obliged by the carrier, travels free of charge. The Commission also presented a legislative proposal to protect passengers in multimodal travels, which includes the extension of persons with reduced mobility (PRM) rights to certain types of multimodal journeys (combination of different transport modes). The lack of full compensation for broken or lost mobility equipment could be addressed with the ongoing negotiations on [Regulation 261/2004](#) on air passenger rights⁸, although the negotiations are difficult.

The [Regulation 1300/2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility \(TSI PRM\)](#) still contains important shortcomings such as the failure to address independent boarding and accessible circulation inside the trains.

⁶ A Total Conversation service is an audiovisual conversation service providing bidirectional symmetric real-time transfer of motion video, text and voice between users in two or more locations. This real time text differs from instant messaging systems because it is the transmission bi-directionally of one character at a time. More information: <https://www.itu.int/en/ITU-T/studygroups/com16/accessibility/Pages/conversation.aspx>

⁷ A general "turn-up-and-go" principle would have been more in line with the CRPD but this opportunity was missed.

⁸ Regulation (EC) No 261/2004 of the European Parliament and of the Council of 11 February 2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights.

In July 2024 the European Commission requested the European Railway Agency to propose a revision of the text, including measures to address existing accessibility gaps. Discussions at a technical level are ongoing.

In 2024, the EU adopted Regulation 2024/1679 on [Union guidelines for the development of the trans-European transport network](#). The Regulation governs the EU policy on transport infrastructure, which notably aims at facilitating transport flows across Member States and supporting territorial, economic and social cohesion. Article 50 on “Accessibility for all users” has particular importance for persons with disabilities as it requires transport infrastructure to “allow seamless mobility and accessibility for all users, in particular elderly people, persons of reduced mobility and passengers with a disability”. Nevertheless, the practical impact of TEN-T is limited due to lack of concrete indicators, targets and monitoring mechanism for the Regulation.

More information:

- [EDF analysis of the adopted recast Rail Passengers’ Rights Regulation \(1371/2007\)](#)
- [EDF Position on Air Passengers’ Rights Regulation \(1107/2006\)](#)
- [EDF Analysis of the European Commission Proposal for revising the TEN-T Regulation](#)
- [EDF Analysis of the new Passenger Rights Regulations](#)
- [EDF Human Rights Report on air travel for persons with disabilities \(2025\)](#)
- [EDF Recommendations for the revision of the TSI-PRM regulation \(2026\)](#)

Relevant CRPD articles: Article 9 - Accessibility; Article 20 - Personal mobility

Suggested questions:

- How is the State implementing the [Regulation 1300/2014 on the technical specifications for interoperability relating to accessibility of the Union’s rail system for persons with disabilities and persons with reduced mobility \(TSI PRM\)](#)? Does it have a National Action Plan to improve Rail Accessibility? Can persons with disabilities independently access stations and rail services operating in the State?

- How is the State planning to improve access to intermodal transport for persons with disabilities during the implementation of the TEN-T Regulation? Does the State plan to develop a national action plan with targets and timelines for improving accessibility of the network? Does the State have a monitoring mechanism to ensure that new TEN-T infrastructure doesn’t create barriers for persons with disabilities?

- To implement the passenger rights' legislative framework in the different transport modes, how does your country ensure the effective work of its National Enforcement Bodies (NEBs) in terms of powers and human / financial resources?

Suggested recommendation:

- Support an ambitious revision of Regulation 1300 / 2014 (TSI-PRM) to make sure that persons with disabilities can travel by rail independently and spontaneously. The revision should prioritise, among others, the provision of level access.

-Strengthen the rights of passengers with disabilities in the ongoing negotiations on passenger rights regulations (enforcement, multimodal and air transport).

Artificial Intelligence: Regulation on artificial intelligence (AI) – Arts 5, 9 and 22 CRPD

The EU adopted its [AI Act](#) on artificial intelligence in May 2024, creating a legal framework for AI in the EU.

Under the AI Act, high-risk AI systems must be tested for bias and fulfil mandatory accessibility requirements. These requirements ensure that high-risk AI systems are usable and compliant with the European Accessibility Act and the Web Accessibility Directive.

High-risk AI systems are those that have a significant impact on the rights, health, safety or economic situation of individuals or groups of individuals. Examples of high-risk AI systems include AI that decides or assists decision making on who is hired or fired, who is admitted to the education system, whether applications for state benefits are approved or not, AI used in policing and migration.

Low or medium risk AI systems are not bound by these obligations but are encouraged to follow voluntary codes of conduct to make AI accessible. The AI Act encourages member states and the European AI Office to facilitate the creation and implementation of such codes of conduct. In EDFs view low and medium risk AI should also have to adhere to mandatory accessibility requirements.

The AI Act is an important legislation, but it has shortcomings in the view of the EDF and other civil society organisations. It prohibits the recognition of emotions in education and employment, but allows it for law enforcement and migration as a high risk. The EDF is concerned because recital 44 questions the scientific validity of emotion recognition systems. The former UN Special Rapporteur on the UN Convention on the Rights of Persons with Disabilities, Gerard Quinn, also warned that these systems are inaccurate and dangerous for persons with disabilities, especially in the area of security, and suggested that member states consider a moratorium.⁹

The former UN Special Rapporteur called on member states to support capacity building of representative organisations of persons with disabilities so that they can monitor the impact of AI on their rights. This includes giving them resources and skills to advocate for responsible and inclusive AI, engage with all stakeholders, including the private sector, and expose harmful or discriminatory uses of the technology. The rapporteur also warned that persons with disabilities will be left behind and have no chance of catching up if they are excluded from the AI revolution. Member states can ensure their inclusion and respect in AI by supporting their representative organisations.¹⁰

In November 2025, the European Commission proposed the [AI Omnibus](#), reforming the AI Act, and the [Data Omnibus](#), reforming privacy-related laws. The AI Omnibus may weaken safeguards important for persons with disabilities, including protections

⁹ See points 54, 65 and 76(c) in [A/HRC/49/52: Artificial intelligence and the rights of persons with disabilities - Report of the Special Rapporteur on the rights of persons with disabilities | OHCHR](#)

¹⁰ See points 20 and 76(g) in [A/HRC/49/52: Artificial intelligence and the rights of persons with disabilities - Report of the Special Rapporteur on the rights of persons with disabilities | OHCHR](#)

against discrimination, sensitive personal data and effective enforcement.¹¹ Related changes in the Data Omnibus may also allow wider processing of personal data to develop and train AI systems.¹²

EDF calls on Member States to ensure that national implementation of the AI Act and related data protection rules remains aligned with the CRPD, including the rights to non-discrimination and privacy, and meaningfully involve OPDs throughout the process.

More information:

- [EDF, Guide on the AI Act \(2025\)](#)
- [EDF, Briefing on the AI Omnibus \(2026\)](#)

Relevant CRPD articles: Article 5 - Equality and non-discrimination; Article 9 – Accessibility; Article 22 - Respect for privacy

Suggested question:

- Provide information on how the State ensures or plans to ensure mandatory accessibility requirements for all AI providers and users, as well as that AI providers and users fully respect rights of persons with disabilities to non-discrimination and privacy, as required by the EU AI Act.

Suggested recommendations:

- Ensure that AI development is regulated to protect the rights of persons with disabilities, including by undertaking fundamental rights impact assessments when deploying high risk AI systems and set up national coordination mechanisms in which relevant authorities for the AI Act are in cooperation with OPDs.
- Adopt mandatory accessibility requirements for all AI systems, including low and medium risk AI.

Humanitarian action, climate and DRR – Art. 11 CRPD

Civil protection and humanitarian action

In June 2019, the EU Directorate-General for European Civil Protection and Humanitarian Aid Operation (ECHO) published a [Guidance Note on the Inclusion of Persons with Disabilities in EU-funded Humanitarian Aid Operations](#) (that will apply to the Member States of the EU where they are involved in humanitarian projects funded by the EU). This guidance note is related in purpose to the [UN IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action](#) which were launched at the end of 2019.

In 2020 EDF provided comprehensive input into the review of the and to the DG ECHO '[EC Communication on EU humanitarian aid](#)'. The Guidelines now contain some mention of disability inclusion, including reference to the Washington Group short set of questions for data disaggregation and the need for DPO participation, and they apply to Member States where they are involved in projects funded by the

¹¹ [AI Omnibus: deregulation at the expense of fundamental rights | ECNL](#)

¹² [What the EU AI Omnibus Deal Changes for the AI Act and What Lies Ahead | TechPolicy.Press](#)

EU.¹³ The Communication also makes explicit reference to persons with disabilities, but these are very light, following far short of the EDF recommendations. and to the DG ECHO '[EC Communication on EU humanitarian aid](#)'. The Guidelines now contain some mention of disability inclusion, including reference to the Washington Group short set of questions for data disaggregation and the need for DPO participation, and they apply to Member States where they are involved in projects funded by the EU.¹⁴ The Communication also makes explicit reference to persons with disabilities, but these are very light, following far short of the EDF recommendations.

In May 2026, the European Commission adopted a [new Joint Communication on Humanitarian Aid](#), setting out measures to strengthen EU humanitarian action in response to rising humanitarian needs, increasing conflicts and growing funding pressures. While the new EU Communication on Humanitarian Aid does not contain specific new commitments on disability inclusion, it reaffirms the EU's commitment to delivering inclusive, needs-based and non-discriminatory humanitarian assistance.

The [Union Civil Protection Mechanism](#) (UCPM) strengthens EU-wide cooperation in disaster prevention, preparedness, and response. Member States must assess risks, maintain protection capacities, offer assistance, contribute to the Civil Protection Pool, and share data via the ERCC. It ensures coordinated action, rapid support, and collective resilience during emergencies. It contains no specific references to persons with disabilities other than including as 'vulnerable', and no obligations to ensure accessibility of early warning, evacuation and shelter.

In March 2025 the EU published the [EU Preparedness Union Strategy](#). Disability is mentioned twice in the Communication document. Most importantly, Action 33 of the strategy is to develop guidelines on disability inclusive emergency response, including training of first responders. This is a positive step and Member States should be ready to adjust national plans accordingly.

The [Disability-Inclusive Emergency Preparedness and Response project](#) supports the implementation of Action 33 of the European Union Preparedness Strategy by strengthening disability-inclusive emergency preparedness and response across Union Civil Protection Mechanism (UCPM) Member and Participating States.

A first outcome is a [diagnostic report](#) mapping the current state of disability inclusion in disaster risk reduction and emergency preparedness across participating countries. The report identifies progress, gaps, and barriers related to accessibility, participation of organisations of persons with disabilities (OPDs), coordination mechanisms, legal frameworks, and inclusive emergency procedures. The report and its [annexes](#) include upcoming countries under review by the Committee: Lithuania, Slovakia, Czechia, Latvia and Romania.

¹⁴ But major gaps still remain, including specific and effective indicators on disability inclusion, reference to the OECD disability DAC marker and regular disability inclusion training of all ECHO and partners' staff.

Its findings are informing the development of practical [guidelines](#) on inclusive emergency action for persons with disabilities and first-responders, which are currently under consultation.

Climate action

The [Conference of Parties \(COP 30\)](#) by the UN Framework Convention on Climate Change (FCCC) took place in Brazil in November 2025. Specific references to persons with disabilities are still almost negligible in outcome documents. The event was slightly more accessible to persons with physical disabilities than previous, but there is still virtually no effort made to ensure accessibility of information. The recent recognition of the Disability Caucus by the UN FCCC as an informal stakeholder group is an important and welcome step. However, the Informal group is not yet recognised as an official 'Constituency' within the UN climate mechanism. Climate negotiators from the EU and its Member States should use their influencing power to address all these gaps in preparation for [COP31 in Turkey](#) (November 2026).

Disaster Risk Reduction (DRR)

States have clear obligations under international frameworks such as the [Sendai Framework for Disaster Risk Reduction \(2015-2030\)](#). It requires the inclusion and participation of persons with disabilities, including accessibility of disaster risk information and the collection of disability-disaggregated data.

Recent global developments, including the [Global Platform for Disaster Risk Reduction 2025](#), have reaffirmed the need to prioritise accessibility, inclusion and the participation of persons with disabilities in disaster risk reduction policies and implementation

At European level, the [European Forum for Disaster Risk Reduction \(EFDRR\) Roadmap 2021-2030](#) is very inclusive of persons with disabilities. However, available evidence shows that implementation remains limited. Persons with disabilities continue to face barriers in accessing early warning systems, risk information, and preparedness planning, and are often not involved in decision-making processes.

Relevant CRPD Article: Article 11 - Situations of risk and humanitarian emergencies

Suggested questions:

- How are national civil protection and disaster management authorities ensuring that persons with disabilities have equal access to early warning, evacuation and emergency shelter procedures? And how are persons with disabilities and their representative organisations meaningfully involved in this work?
- How do you ensure the implementation of the EU Preparedness strategy at the national level?
- How are your climate negotiators at national and international level ensuring persons with disabilities are included and involved in planning to address climate action?

Suggested recommendations:

- Ensure the use of Washington Group short set of questions for data disaggregation and participation of organisations of persons with disabilities in EU projects

implemented by Member States, in line with the [ECHO ‘Single Form’ Guidelines](#) and the ECHO [‘EC Communication on EU humanitarian aid’](#).

Access to justice – Art. 13 CRPD

Digitalisation of justice

The EU is committed to supporting the [digitalisation of justice systems](#) across its member states. In 2023, it adopted a [Regulation on digitalisation of justice in cross-border cooperation](#), which includes specific requirements regarding accessibility for persons with disabilities. The Regulation mandates accessibility for participation in hearings through videoconferencing, as well as for decentralised IT systems, the European electronic access point, and electronic payment methods, all of which must comply with the requirements set out in the Accessibility Act.

Victims and offenders’ rights

In 2012, the European Union adopted a [Victims’ Rights Directive](#) which establishes minimum standards on the rights, support and protection of victims. It specifically requires States to ensure the needs of victims with disabilities are met when ensuring their rights to:

- understand and be understood
- information
- support
- participate in criminal proceedings
- protection and individual assessment

In 2026, the EU adopted a [revised version of the Victims’ Rights Directive](#) that includes **enhanced rights and protection for victims with disabilities**, including obligations for member states to ensure accessibility, equal access to services for victims, and procedural accommodation (article 26c). The revised law still needs to be published in the EU Official Journal (expected for July 2026), after which countries will have 2 years to transpose the law. The EU is also planning to adopt a new victims’ rights strategy in 2026, building on its [previous strategy](#) that ran from 2020 to 2025.

For certain groups of victims, the EU adopted specific rules.¹⁵ In January 2024, the EU agreed on a [revision of its Anti-Trafficking Directive](#), providing additional support to, among others, victims with disabilities.

In a similar way, the EU adopted several directives to protect the rights of suspects and accused, that should be implemented by States without discrimination on the grounds of disability. More specifically, the EU established rules on:

- the [right to information](#)
- the [right to interpretation and translation](#)

¹⁵ These rules build on the victims’ rights directive but respond more directly to the specific needs of some victims. The EU legislation exists to provide protection and support for [victims of human trafficking](#), [child victims of sexual exploitation and child pornography](#) and victims of [terrorism](#).

- the [right to have a lawyer](#)
- the right to be [presumed innocent and to be present at trial](#)
- special [safeguards for children suspected and accused in criminal proceedings](#)
- the [right to legal aid](#)

Relevant CRPD article: Article 13 - Access to justice

Suggested questions:

- Provide information on measures taken to ensure that the rights of victims with disabilities and people with disabilities suspected or accused of an offence is fully fulfilled in line with the CRPD and relevant EU directives.

- How is the country planning to ensure the transposition of the Revised Victims' Rights Directive to protect the rights of victims with disabilities, in particular to ensure procedural accommodation?

Suggested recommendations:

- Take measures to ensure accessibility of the justice system for persons with disabilities, including through digitalisation, in line with the requirements of the Accessibility Act and the Regulation on digitalisation of cross-border cooperation.

- Take measures to ensure that the right to access to justice of victims with disabilities and people with disabilities suspected or accused of an offence is fully fulfilled, in accordance with the CRPD and obligations of the State under EU law (including the newly revised Victims' Rights Directive, the Anti-Trafficking Directive and the Directive on combating violence against women), in particular concerning the provision of accessibility, procedural accommodation and access to protection and support services.

Independent living: Use of European funds to promote community living and community-based services – Art. 19 CRPD

The EU developed various funds called “European structural and investment funds” (European Regional Development Fund, European Social Fund Plus, Cohesion Fund, European Agricultural Fund for Rural Development, European Maritime and Fisheries Fund, Just Transition Fund). They can be used by Member States for a wide range of measures. Although the EU monitors their use, there may be a risk that some countries [use them in a way that may not comply with the CRPD](#).

Common complaints about how EU funds are used involve money going towards segregated settings for persons with disabilities. This includes the building or renovation of residential institutions, and of sheltered workshops for persons with disabilities.

As part of the European Strategy on the Rights of Persons with Disabilities, in November 2024 the European Commission released a [Guidance on Independent Living and Inclusion in the Community](#). The aim of the Guidance is to clarify which

type of investments promote independent living and inclusion and avoid institutionalisation. It is however only a guidance document and is not legally binding.

Relevant CRPD article: Article 19 - Living independently and being included in the community

Suggested questions:

- Provide information on the use of EU and national funds, and measures taken to ensure that the funds are invested in line with the CRPD, and in particular, with the aim to promote community living and community-based support services, achieving deinstitutionalisation and independent living of persons with disabilities.

Suggested recommendation:

- “Calls upon the State party to re-examine the allocation of funds, including the regional funds obtained from the EU, dedicated to the provision of support services for persons with disabilities, and ensure the full compliance with the provisions of article 19 of the Convention.” - as in CRPD Concluding Observations to Hungary ([CRPD/C/HUN/CO/1](#)), paragraph 35.

Freedom of movement and the European Disability Card – Art. 20 CRPD

Freedom of movement is one of the four basic freedoms under the EU Treaties but for persons with disabilities, there are still many obstacles. Portability of disability and other social security related benefits, as well as recognition of ones’ disability status are far from being harmonised. Moving to another EU Member State, temporarily or permanently, is still a challenge for many persons with disabilities.

A big step forward was achieved with the adoption of the Directive(s) on the European Disability Card and the European Parking Card ([Directives 2841/2024](#) and [2842/2024](#)) in October 2024, a legislative project that had been one of the core demands of the disability movement for over 10 years.

While the agreed text is an improvement to the status quo, the scope of the proposal remains limited to accessing “special conditions and preferential treatment” for short stays abroad. It does not touch upon the fundamental issue of having ones’ disability (re)assessed in another Member State, or the lack of portability of social security benefits when moving abroad. The Disability Card law does not solve all the problems, but it is a starting point.

However, it also depends how ambitiously the legislation will be transposed and implemented by the Member States, since there is some flexibility in the text. Member States still have **until June 2027 to transpose the law**, and **until June 2028 to start issuing the Cards**.

More information:

- [EDF webpage on the Disability Card and Parking Card](#)

Relevant CRPD article: Article 20 - Personal mobility

Suggested question:

- How are you planning to ensure that the portability of social security related benefits including disability benefits be improved in the EU beyond the Disability Card?

Suggested recommendations:

- Swiftly introduce ambitious national laws transposing the European Disability Card and Parking Card Directive, ensuring that all persons with disabilities can access the European Disability Card.
- Commit to further legislation on portability of benefits that will close the gaps left by the Disability Card Directive.

Young persons and youth programmes – Art. 24 CRPD

The EU adopted a [Youth Strategy for the period of 2019-2027](#). The strategy has concrete actions and objectives to better include young people in the decision-making process. The Strategy has inclusion as one its core elements but mentions persons with disabilities only once in the preamble. It does not mention the CRPD nor how persons with disabilities should be included.

In Spring 2026, the European Commission has published its [Strategy on Intergenerational Fairness](#) to reduce the gap between generation and to ensure that resources are shared fairly between generation and that a sustainable approach is looked for by the decision maker to ensure that the next generation can continue. The text mentions the difficulties young people with disabilities are facing in the transition period from education to adulthood, including challenges related housing, accessibility in transport and digitalisation. However, there is no concrete actions including young persons with disabilities.

Inclusion of young persons with disabilities was tackled in some of the Youth Programmes driven by this strategy such as the [European Solidarity Corps](#) on volunteering and [Erasmus + Programmes](#) on work and education abroad. For example, [Guidelines on Inclusion and Diversity](#) were issued for both programmes. The Erasmus+ Programme also foresees prefinancing for disability related costs. However, many young people with disabilities still cannot benefit of these programmes. It is essential that that host countries give the same disability services and support to students coming through student mobility programmes than their own students with disabilities. The Erasmus+ together with all EU programmes are being reviewed for the period 2028-2034. The new proposal for Erasmus+ is weaker than the present one. The prefinancing is not included any more when it comes to disability related costs.

The [EU Youth Guarantee](#) provides funding to young people to study and work. We see that in some countries, young people with disabilities cannot benefit from the funding because they have to choose between the youth guarantee scheme and their disability allowance.

In 2024, the European Commission released a [proposal for an EU Directive fighting against low quality and exploitative traineeships](#). The original proposal did not contain any provisions on the specific challenges faced by young persons with disabilities. The European Parliament and the Council of the EU will now propose amendments and negotiate the final text. The European Parliament's position has included a

mention of the need to use state aid to facilitate reasonable accommodation for trainees with disabilities.

Relevant CRPD article: Article 24 - Education

Suggested questions:

- Provide information on how the State ensures that young persons with disabilities equally benefit from the EU Youth and mobility programmes.
- How does your country support young persons with disabilities in making the transition from education to employment in the open labour market?

Suggested recommendation:

- Ensure that the State provide adequate support to students with disabilities coming through the Erasmus+ Programme, on an equal basis to its own students with disabilities.

Health – Art. 25 CRPD

Implementation of the Patient Mobility Directive

In 2021, the EU adopted [Directive 2011/24/EU on patients' rights in cross-border health care](#) (Patient Mobility Directive) that gives the right to EU citizens to seek healthcare in another EU Member State.

According to research conducted by EDF, patients with disabilities continue to face barriers in accessing cross-border healthcare. The National Contact Points in charge of providing information on access to cross-border healthcare do not systematically provide accessible and targeted information to patients with disabilities. For example, on the National Contact Points' websites, no information is provided on reasonable adjustments of healthcare facilities and services, neither on sexual nor reproductive healthcare services. Few websites provide information on physical accessibility of healthcare facilities.¹⁶

In addition, EU law on cross-border healthcare includes an optional provision on reimbursement of additional disability-related costs. Whether disability-related costs (e.g., increased transport costs and costs incurred by personal assistants) are reimbursed has an obvious impact on the capacity of patients with disabilities to exercise their right to planned cross-border healthcare. A previous report showed that no additional costs were reimbursed in 76% of a small sample.¹⁷

More information:

- [EDF Report on Access to cross border healthcare by patients with disabilities in the European Union](#)

Guidelines on how to increase access and overcome barriers in access to healthcare for persons with disabilities

In 2025, the EU published [Guidelines on how to increase access and overcome barriers in access to healthcare for persons with disabilities](#). The guidelines provide

¹⁶ More detailed information on the Directive is available in [EDF report on access to cross-border healthcare by patients with disabilities in the EU](#).

¹⁷ IF, [Impact of cross-border healthcare on persons with disabilities and chronic conditions](#) (2016), 3, 15.

an important practical framework for implementing States Parties' obligations under Article 25 of the CRPD. The Guidelines identify persistent barriers that persons with disabilities face in accessing healthcare, including physical and communication inaccessibility, inadequate disability-related training of healthcare professionals, inaccessible information, and fragmented support services. They offer concrete measures for addressing these barriers through a variety of actions tailored to the level of development of the Member State and with reference to good practices, a cost-benefit analysis of select actions, and country-specific research.

Given that the organisation, delivery, and financing of healthcare services remain primarily the responsibility of Member States, and that States Parties bear the primary obligations under the Convention, national authorities cannot rely solely on EU-level action to advance disability-inclusive healthcare.

More information:

- [Report with the mapping and analysis of existing bottlenecks and good practices including country fiches and conclusions](#)
- [Country fiches](#)
- [Report on the cost-benefit analysis of more inclusive healthcare systems for people with disabilities](#)
- [Study report on people with disabilities regarding their access to screening programmes, diagnoses and treatment for cancer, barriers in accessibility and affordability of cancer care for disabled patients, and differences in the quality of care they receive](#)

Relevant CRPD article: Article 25 – Health

Suggested questions:

- What efforts are being made to ensure full and proper implementation of the Patient Mobility Directive?
- What efforts are being made or planned to support the implementation of the EU guidelines on access to healthcare for persons with disabilities?

Suggested recommendations:

- Recommends taking measures to adequately ensure access to cross-border healthcare across the EU in line with Directive 2011/24/EU, ensuring that the National Contact Point is disability-inclusive, and that reimbursement of additional disability-related costs are covered.
- Recommends taking measures to integrate the Guidelines on access to healthcare for persons with disabilities into national health policies, strategies, actions plans, and budgeting processes to ensure full implementation.

Employment – Art. 27 CRPD

New legislation on [minimum wages](#), [pay transparency](#) and [reporting requirements for employers](#) have been adopted by the EU in recent years. The deadlines for these to be integrated into the national legislation of the 27 EU Member States varies. For the Directive on minimum wages, the transposition deadline was **November 2024**. For Pay Transparency the deadline is **June 2026**. For reporting requirements for

employers, the EU is still determining the extent to which the adopted Directive will be simplified as part of the EU's [Omnibus Package for reducing red tape](#).

In addition to these recent additions to the EU's legislative framework, the EU already has long-standing **Directive on non-discrimination in employment**. However, it remains insufficiently implemented by the EU member States. The Employment Equality Directive ([Council Directive 2000/78/EC](#)) establishes a general framework for equal treatment in employment, vocational guidance and training. It underlines that there shall be no direct or indirect discrimination whatsoever on the grounds of disability. It also further clarifies that "indirect discrimination shall be taken to occur where an apparently neutral provision, criterion or practice would put persons having [...] a particular disability [...] at a particular disadvantage compared with other persons [...]". Article 5 of the Directive states that reasonable accommodation shall be provided in order to guarantee compliance with the principle of equal treatment in relation to persons with disabilities. However, this article in particular is poorly implemented across the EU, with too many persons with disabilities not being provided with adjustments and flexibility at work that would allow them to do their job.

The European Commission has just provided clarity on how it considers Article 5 of the Directive should be implemented well through the creation of new [guidelines on reasonable accommodation](#) as part of the [EU Disability Employment Package](#). However, no binding measures for the respect of article 5 have been proposed. The Disability Employment Package has also shared learning on good practices for public employment services that support persons with disabilities to find work, and ways to support transition from sheltered workshops to employment in the open labour market.

More information: [EDF Human Rights Report 2023 on the Right to Work](#)

Relevant CRPD article: Article 27 – Work and Employment

Suggested questions:

- How are employees with disabilities being protected from discrimination in recruitment and employment? What measures are being taken to ensure that reasonable accommodation is provided to workers with disabilities on the basis of their requirements?

- Does the State allow, or intend to allow, persons with disabilities to more easily combine income through paid work with their entitlement to disability allowance?

- How is the State planning to improve employment outcomes for persons with disabilities in the open labour market rather than in sheltered workshops, and to facilitate employer's access to state aid that will support them in welcoming workers with disabilities?

Suggested recommendations:

- Be strict on how the Minimum Wage Directive is applied to sheltered employment settings for persons with disabilities in the Member States. Ensure that these settings do not escape their obligations to provide fair wages, even in cases where workers are not provided with a work contract or the legal status of "employee". Ultimately, prioritise the transition from sheltered workshops to the open labour market by

improving support to employees with disabilities regarding training and reasonable accommodation, as well as in supporting employers

- Promote the compatibility of disability allowance with income from paid work, meaning that people do not risk losing some or all of their financial support when they begin working.

Political participation: Right to vote and stand for election in the European Parliament – Art. 29 CRPD

In 2022, the European Parliament adopted a [resolution proposing a reform of the European Union \(EU\) electoral law of 1976](#). It is an important opportunity to make the EU Parliament elections more accessible and inclusive of EU citizens with disabilities. However, Member States in the Council do not seem to have political will to agree on such proposal. Besides other elements to strengthen EU elections, the proposed regulation aims at ensuring that all EU citizens with disabilities can vote regardless of legal capacity status, and it includes provisions regarding the accessibility of the EU elections which are arranged at national level.

Additionally, the EU Treaties guarantee that mobile EU citizens living in another EU Member State enjoy the same political rights under the same conditions as nationals regarding the European and municipal elections. In this regard, Member States in the Council have agreed on two laws (in 2025 and 2026), known as the **Mobile EU citizens Directives**¹⁸. These Directives introduce an accessibility provision when it comes to information to non-national voters with disabilities, but did not secure the prevalence of the right to vote of persons with disabilities when moving from one country upholding this right to another which does not, and vice versa.

The last elections in the European Parliament took place in June 2024. According to the [Fundamental Rights Agency latest study](#), there are still 13 EU Member States where certain persons with disabilities are deprived of their suffrage rights.¹⁹

More information:

- [EDF 6th Human Rights Report on political participation](#)

Relevant CRPD article: Article 29 – Political participation

Suggested questions:

- How does the State ensure the right to vote and stand for elections of persons with disabilities, including those under substituted decision-making mechanisms, in national and European elections?

- What measures have been put in place to maximise the accessibility of European elections to guarantee that all persons with disabilities can vote independently and in secret, and can freely chose assistance to vote? Does the country guarantee the same rights for non-national EU citizens in municipal and European elections?

Suggested recommendations:

¹⁸ [Council Directive on mobile EU citizens in European Parliament elections](#), and [Council Directive on mobile EU citizens in municipal elections](#).

¹⁹ Among these, according to the Agency, in Bulgaria, Cyprus, Estonia, Malta, Poland, Portugal and Romania people under legal guardianship are automatically removed from the voting process.

- Recommend that the State remove all legal barriers concerning the right to vote and stand as candidate for all persons with disabilities without exemptions and liaise with organisations of persons with disabilities to adopt accessibility requirements of the proceeding of the national and European elections as well as reasonable accommodation ensuring to vote independently and in secret, and no restriction in form of assistance.
- Recommend that there is financial support to candidates with disabilities to run for office in local, regional, national and European elections to campaign on equal footing with other candidates.

International cooperation – Art. 32 CRPD

The [European Union’s Global Gateway](#) is the **EU’s flagship external investment strategy**, launched in 2021 with the objective of mobilising up to €300 billion in investments by 2027. The strategy focuses on sectors including digital connectivity, climate and energy, transport, health, and education, with a strong emphasis on Africa, which is expected to receive around €150 billion in investments.

Global Gateway marks a significant shift in EU external action from traditional grant-based aid towards **investment-driven approaches** relying on loans, guarantees, and private sector involvement. Through the so-called “**360-degree approach**”, the EU aims to ensure that investments generate broader social and developmental benefits beyond infrastructure alone. In principle, this includes linking investments with skills development, local job creation, gender equality, environmental sustainability, regulatory reform, and consultation with local stakeholders and civil society organisations.

There is currently **very limited public information** on how disability inclusion is integrated into Global Gateway investments and the EU 360-degree approach. Clear safeguards, accountability mechanisms, disability-disaggregated data, and dedicated funding requirements remain largely absent.

Section six of the [Strategy for the Rights of Persons with Disabilities 2021-2030](#) discusses promoting the rights of persons with disabilities globally. While the Strategy mostly focuses on EU policies, it notes that the EU together with its Member States shall provide technical assistance to partner countries’ administrations through their programmes and facilities.

In December 2020 the EU also adopted the [EU Action Plan on Human Rights and Democracy 2020-2024](#) which set the level of ambition and defines the priorities of the EU and its Member States in this field in relations with all third countries. The Action Plan is now extended to 2027. Ongoing consultations and parliamentary reviews are evaluating this current plan and discussing how the post-2027 Action Plan will look like. EDF calls for the next EU Action Plan on Human Rights and Democracy to strengthen the systematic inclusion of disability rights and CRPD across all areas of EU development cooperation and external action.

The current [EU Gender Equality Action Plan III](#) (GAP III), covering the period 2020–2027, provides the framework for advancing gender equality and women’s empowerment in the EU’s external action. The forthcoming EU Gender Equality

Action Plan IV (post 2027 GAP IV) is an important opportunity for the EU to strengthen its global leadership on gender equality, women's rights, and inclusive international cooperation. EDF calls for GAP IV to become the first fully disability-inclusive Gender Action Plan by explicitly including women and girls with disabilities across all priorities, financing instruments, implementation systems, and monitoring frameworks. This is essential to address the multiple and intersecting forms of discrimination faced by women and girls with disabilities, in line with the CRPD, CEDAW, Agenda 2030, and EU equality commitments.

Relevant CRPD article: Article 32 - International cooperation

Suggested questions:

- How does the State ensure that investments and development projects it supports under the EU's Global Gateway strategy are inclusive of persons with disabilities and do not create new barriers?
- How does the State ensure national development cooperation strategies and programmes include and are accessible to persons with disabilities?

Suggested recommendation:

- Ensure that development cooperation and external action programmes, including under the EU's Global Gateway Strategy, are fully inclusive of persons with disabilities, including through accessibility requirements, funding and participation.
- Establish mechanisms to monitor and ensure that investments and development projects are inclusive and do not create new barriers.