



EU Strategy on the Rights of Persons with Disabilities: Assessment of actions 2026-2030

European Disability Forum Position Paper
May 2026

**Analysis of the European Commission communication:
“Enhancing the strategy for the rights of persons with
disabilities up to 2030”**



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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.

Executive Summary

The European Commission launched its [Enhanced Strategy on the Rights of Persons with Disabilities](#) on 6 May 2026. In practical terms, this outlines actions for the second half of the [EU Strategy on the Rights of Persons with Disabilities 2021-2030](#).

In March 2021, when the Strategy was launched, it contained proposals for actions and flagship initiatives running until 2025. After calls from EDF and the wider disability movement, the European Commission committed to new actions to fill the period 2026-2030. These are the actions that we are analysing here.

The aim of this paper is therefore to outline all the actions proposed under the enhanced strategy, to briefly assess the aspects that are positive and negative in each action, and to outline what we see as necessary to ensure the best possible implementation. In some cases we give actions a general score of **positive**, **negative** or **neutral**, followed by a short explanation. In a few select cases, we have gone as far as to score an action as **very positive**, given that it matches exactly what EDF has been calling for in form and in scope. In other cases, where the actions are more complex, we list a mixture of **positive points**, **negative points** and **neutral points**.

This paper does not seek to deliver an in-depth analysis of each action. Instead, it provides a digestible and concise evaluation of all actions, allowing us to gauge where there is real potential to advance the rights of persons with disabilities in the EU and beyond.

Types of actions in the enhanced strategy

The Enhanced Strategy for the Rights of Persons with Disabilities proposes different types of actions. In terms of legislation, we count 2 possible actions that could lead to new legislation, but without a guarantee that these will be delivered. There are also 8 proposals to review and refine existing EU legislation, or legislative proposals that are still under development.

The most common types of action come in the forms of reports, research and guidance.

Below we present a quantitative overview of how we would classify the different activities in the enhanced strategy. Please note that certain actions belong to more than one category, whereas a few fitted into none of the categories below.

- New legislation or policy initiative: **2**
- Review of existing or ongoing legislation: **8**
- Recommendations or Guidance: **10**
- Research, studies and reports: **9**
- Data collection: **4**
- Dialogues and networks of stakeholders: **5**
- EU roadmaps, action plans, packages or strategies: **4**
- Using EU funding: **5**

- Events and Training: **2**
- Monitoring and follow up of existing measures: **7**
- Support for member states and partner countries: **6**
- Awareness raising and sharing good practice: **6**
- Inclusion of persons with disabilities in EU institutions: **4**
- Accessibility of EU institutions and communications: **2**

Legislation in the enhanced strategy

The two potential new pieces of legislation we refer to in the Enhanced Strategy are the following:

1. Consider legislation based on the existing areas of crime covered by Article 83(1) of TFEU to harmonise the definition of hate offences committed online, and possibly include public incitement to violence or hatred online on grounds not currently covered by EU law, such as disability.
2. Consult European social partners on the possible direction of EU action to support the activation of persons excluded from the labour market.

It is worth noting the little certainty that is given as to whether these actions will become legislation at all. The strategy uses wording such as 'consider legislation' and talks of a 'possible direction of EU action'. Therefore, they will require the active engagement and advocacy by the disability movement.

In the first action on harmonising the definition of hate offences, the idea is also not entirely new nor exclusive to the Disability Strategy. Instead, it was already included in the [LGBTIQ+ Equality Strategy 2026-2030](#).

As for the action on activation of persons with disabilities in the labour market, which was also announced in the [Anti-poverty Strategy](#), there is also no clear indication whether the action will be something binding or based on legislation.

The impact of the revision of existing legislation or legislation already under development seems more likely to have tangible outcomes. However, the extent to which disability rights will be integrated into the final legal texts also remains uncertain as it depends on the Commission proposals, and the positions of the European Parliament and Council of the EU.

Calls to the Member States

The Enhanced Strategy also contains 7 calls to the EU Member States. These are areas where the Commission urges the Member States to take the lead in delivering action themselves. The 7 calls are the following:

Accessibility: Improvement of accessibility in standards and technical specifications, including in public procurement, and training professionals.

Democratic process: promote participation and provide accessible information, communications and voting materials, procedures and facilities.

Independent living: national targets, accessible housing, community-based services, personal assistance, centres for independent living, and supported decision-making.

Social protection: modernise social protection for coverage and adequacy gaps for persons with disabilities and work disincentives, compensating disability extra costs, and person-centred funding.

Quality jobs: national employment targets for persons with disabilities in the open labour market, and ensuring reasonable accommodation and rehabilitation.

Inclusive education: children, adolescents and young persons with disabilities in mainstream education, accessible and adapted learning materials, individualised teaching approaches.

Preparedness and humanitarian aid: inclusive and accessible humanitarian aid operations, meaningful access to full participation in humanitarian action.

Efficiency delivering the strategy: share good practices from their disability plans and strategies and exchange information on national developments via the Disability Platform.

Actions that are not new

In our analysis of the Enhanced Strategy, the European Disability Forum counted a significant number of actions that are not new. This means that their existence is not at all linked to or dependent on the release of the Enhanced Strategy. We have been conscious to indicate in our analysis of the actions where this is the case.

While some of these actions have only recently been introduced through other newly-released strategies, a considerable number already began or were (sometimes legally) scheduled, such as revision of existing legislation.

Inclusion of EDF's demands in the enhanced strategy

Ahead of Commission's work on the second phase of the EU Strategy on the Rights of Persons with Disabilities, EDF developed and presented a [detailed position paper outlining its recommendations for new actions](#).

Below is a list of the proposals made by EDF that were not taken into account in the final actions, those that were included, and those that were partially included, albeit with a different means of implementation or altered scope of activity.

Not included

- Flagship 1: European Agency for Accessibility
- Flagship 2: Legislation on the affordability of assistive technology
- Flagship 3: Directive for full freedom of movement of persons with disabilities
- Flagship 4: Disability Employment and Skills Guarantee
- Flagship 6: Set rules on accessibility for all EU funding going towards housing
- Flagship 7: Strong actions to end forced sterilisation
- Flagship 8: Disability Action Plan in EU External Action
- Revise Regulation 1107/2006 on the rights of persons with disabilities travelling by air
- Recognition of national sign languages as part of the multilingual EU
- Adoption of a Horizontal Equal Treatment Directive
- Set quota system for employees with disabilities in the EU institutions
- Initiative on the mutual recognition of assistance dogs
- Legislation on equal access to essential services
- Copyright exemptions on cultural works for accessibility
- Single Digital Booking and Ticketing Regulation for transport
- A Directive to regulate the use of algorithms for managing, monitoring and recruiting workers
- Recommendations to the Member States on compatibility between disability allowance and other forms of income
- Study on income and pension gaps for informal carers
- Study on the impact of the transition to adulthood for young persons with disabilities
- EU coordinator on ending all forms of violence against women

- Support representation of persons with disabilities in the media
- Budget for Community-based Support Beyond EU Member States
- Strengthen inclusive education in the European schools
- Establish an annual Disability Rights Forum
- Introduce changes to the Access City Awards

Included

- Revision of the Public Procurement Directive
- Embedding disability in the European Semester to shape the use of EU funds
- Study on the extra cost of living of persons with disabilities
- Further guidance for the Member States on inclusive forms of employment
- Guidance to the Member States on good practice for disability assessment
- Continue Supporting Reconstruction in Ukraine
- Expand representation within the Disability Platform
- Improve provision of reasonable accommodation by the European Personnel Recruitment Office (EPSO)
- Inclusive traineeship programmes in the EU institutions
- Guidance for Member States on implementing accessibility provisions for buildings in the Energy Performance of Buildings Directive
- Promotion and implementation of EC Guidelines on access to healthcare for persons with disabilities
- Improve data collection disaggregated by disability
- Support Disability Rights in EU Accession Countries
- Protect Persons with Disabilities in Situations of Conflict and Fragile States
- Continue with the monitoring framework for the Strategy
- Enhance the functioning of the EU CRPD Monitoring Framework

Included to a certain extent, by different means or a different scope

- **Flagship 5:** EU Package on de-institutionalisation
- Accessible transport vehicles and infrastructure
- EU accessibility guidelines on urban public transport infrastructure and vehicles
- Revision of the European Standardisation System
- Legislation on Accessible Labelling

- Revision of the Audiovisual Media Services Directive (AVMSD)
- Access to higher education and European mobility programmes
- Action plan on equality and intersectionality and annual Equality conference
- Awareness-raising campaign on women with disabilities
- Recommendations on autonomy and supported decision making of persons with disabilities and older persons
- EU study on disability hate speech and hate crime
- Inclusion of persons with disabilities in migration and asylum policy: Guidelines on applicants with disabilities in asylum procedures
- Trainings on access to justice
- Ensure Disability-inclusive Climate Action

Analysis of actions under the Enhanced Strategy

1. Accessibility – an enabler of rights, autonomy and equality

Digital accessibility and assistive technologies

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Assistive technologies and AI: from lab to market. The Commission will seek to promote better knowledge and strengthen the single market for assistive technologies and AI applications. The aim is to identify and remove bottlenecks that prevent persons with disabilities from benefiting from accessible and affordable technologies. The initiative includes: (i) an EU-level dialogue with assistive technology operators, involving users and public administrations, showcasing relevant EU business support initiatives such as the Enterprise Europe Network and identifying funding opportunities to facilitate 'from lab to market' transitions; and (ii) a study to assess obstacles to accessing assistive technologies and AI for persons with disabilities and provide suggestions to address them.	Positive points: • Recognises barriers to Assistive Technology (AT) as a priority as highlighted by EDF. • A study to assess obstacles is necessary to build the case for a future legislation. • Highlight existing EU mechanisms to support small and medium enterprises (SMEs) working on AT. Neutral points: • Dialogue between AT industry, public administration and users. Negative points: • It is hard to understand why AT is mixed with Artificial Intelligence in this flagship initiatives. Not all AT use AI. • The focus should not be only on small and medium enterprises, as there are big companies in the AT sector.	• Clarify whether the dialogue will be one-off or regular and participate actively. • Take into consideration AT using AI but without losing the focus on the availability and affordability of AT in the study. • Highlight big market players in the AT sector. • Set the basis for a future legislation on availability and affordability of AT. • Recommend Member States to create structures where designers of AI systems can consult a broad range of persons with disabilities who have been educated in how to meaningfully participate in a co-creation process when it comes to AI. The users should be compensated for their time.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Support of AccessibleEU.	Positive , although it remains as an EU-funded project rather than a fully-fledged agency.	- Continue advocating for an EU regulatory agency. - The AccessibleEU centre should further support authorities responsible for the implementation and enforcement of EU harmonised accessibility legislation.
Monitor implementation and application of the European Accessibility Act (EAA), including through expert groups and committees.	Neutral . Not new, foreseen in article 28 of the Accessibility Act.	EDF is member of the EAA working group.
Follow up on the standardisation request M587 and technical specifications regarding accessibility requirements for products and services.	Neutral . Not new, foreseen in the EAA.	- EDF is active in the standardisation developments. All standards are in the making, but late. - Advocate for pending technical specifications for e-books not covered under M/587.
Evaluation of the Audiovisual Media Services Directive.	Neutral . Not new, revised AVMSD planned for after the summer.	Strengthen accessibility provisions.
Monitoring the application of the Web Accessibility Directive.	Neutral . Not new, foreseen in the Web Accessibility Directive.	- Support monitoring. - The Commission should publish a summary of the monitoring reports submitted by Member States stressing shortcomings in implementation.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Monitoring the European Electronic Communications Code, pending its proposed revision.	Neutral. Not new, the Digital Networks Act revising the Code is already out and did not improve substantially disability-related provisions.	Strengthen provisions to ensure equivalent access and choice to electronic communications.
Support efforts to make internet platforms and digital services more accessible, including through the codes of conduct under the Digital Services Act.	Neutral. Not new, the codes of conduct should have been adopted by February 2025.	Advocate for the adoption of such codes of conduct while requesting making them a legal obligation as in other digital policy files.
Issue and follow up on guidelines for the implementation of the Artificial Intelligence (AI) Act e.g. on the prohibited AI practice that exploit the vulnerability of a person in a significantly harmful manner due, amongst other reasons, to disability as well as on the classification of high-risk AI systems	Neutral. Not new as the development of these guidelines is already foreseen in the AI Act.	• Advocate for the AI Act guidelines to include clear disability specific guidance on prohibited AI practices. • Ensure that organisations of persons with disabilities are meaningfully involved in the development and follow-up of the guidelines and monitor whether they lead to concrete enforcement against discriminatory or harmful systems.

Safe and accessible products and services

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Better access to transport for persons with disabilities. The Commission will promote accessibility across various means of transport. The initiative includes the following deliverables: (i) in rail transport: establishing common EU	Positive points: • Deliverable (iv) recognises the handling and carriage of assistance dogs and mobility aids as priorities. • Although deliverable (i) is not new and the European Commission	Deliverable (i). Advocate for an ambitious revision of the rail accessibility regulation (also known as TSI PRM Regulation) towards ERA, the Commission and particularly Member States.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
priorities and criteria for railway accessibility requirements by revising the technical specifications for interoperability relating to persons with reduced mobility. In this context, the EU Agency for Railways will issue recommendations for the revision of the technical specifications e.g. to improve the train to platform step, to facilitate unassisted boarding and improve accessibility of night trains; (ii) in road transport: upgrading the sustainable urban mobility planning reference material on vulnerable groups and publishing guidance on road infrastructure safety features for vulnerable users. In addition, the Alternative Fuels Infrastructure Regulation and its forthcoming review will seek to integrate the European technical standards on accessibility of electric road vehicles charging stations; (iii) in waterborne transport: reviewing accessibility provisions as part of the evaluation of the Directive on safety rules and standards for passenger ships; and (iv) in air transport: engaging with aviation stakeholders and disseminating good practices among operators to enhance the air travel experience for persons with disabilities e.g. through dialogues concerning the	and the European Railway Agency are already working on it, this revision process can lead to significant improvements to rail travel for passengers with disabilities. • Second part of deliverable (ii) could lead to specific accessibility requirements for the deployment of electric recharging infrastructure, something that is currently missing on the Alternative Fuels Infrastructure Regulation. Neutral points: • Deliverable (i) on rail accessibility, and (iii) on waterborne transport are not new. Negative points: • The flagship misses coach and bus transport. • Deliverable (iv) is too general and does not propose any concrete initiative.	• Deliverable (iv) on air transport. Ensure that the engagement between aviation stakeholders is regular, not one-off, and expand the topics to be covered in the future. Continue advocating for the Revision of Regulation 1107/2006. • Advocate for stronger accessibility requirements in planes, bus and coach and passenger ships.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
handling and carriage of assistance dogs and mobility aids. The Commission will promote accessible labelling in key sectors such as energy, food and cosmetics. In the area of energy labelling, documents generated by the European product registry for energy labelling (EPREL) will be made more accessible as of 2026.	Positive points: • priority highlighted by EDF and now acknowledged by the Commission. • documents automatically generated for energy labelling will be made “more accessible” as of 2026 Negative points: • promoting does not necessarily commit to legally requested accessibility.	• Advocate for a horizontal legal initiative amending all the necessary laws to guarantee accessible labelling. • Introduce or strengthen binding accessibility provisions in future revision of labelling-related EU laws, such as the General Product Safety Regulation. • Make sure automatically-generated documents regarding energy labelling comply with the same accessibility requirements as other digital documents covered by the Web Directive or the Accessibility Act.
The implementation of the General Product Safety Regulation and of the revised legislation on Alternative Dispute Resolution will help enhance accessibility and the safety of consumers with disabilities.	Neutral. Not new as these legislations were recently adopted. Whereas the General Product Safety Regulation does include provisions related to persons with disabilities and accessibility (not on accessible labelling), the Alternative Dispute Resolution (ADR) Directive does not mention persons with disabilities and does not require accessibility to private ADR bodies.	• Introduce accessible labelling in the General Product Safety Regulation in future evaluation/revision. • Ensure the same level of accessibility between private and public ADR bodies.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Coordinate the work of national consumer protection authorities and the European Consumer Centres (ECC) Network, seeking to ensure that consumer vulnerabilities are not exploited and rights of consumers with disabilities are respected.	Positive. Consumer protection authorities and ECC Network have not worked actively with organisations of persons with disabilities (OPDs) before so this could be an improvement. However, it depends how it is done and formalised as OPDs need the capacity to engage as well.	Disability organisations to be invited to this Network.
The Commission will look into ways of improving participation of persons with disabilities in standardisation processes and making standards more accessible and inclusive in the review of the Standardisation Regulation.	Neutral. Not new. The proposal for the revised Standardisation Regulation is expected after the summer of 2026. It is positive that the Commission acknowledges the barriers faced by disability organisations when participating in standardisation or accessing European standards. It will be more positive, if the Commission adopts a revised Regulation that addresses these barriers.	In the revised European standardisation regulation, ensure an accessible, inclusive, fair, and accountable European standardisation system, as well as free-of-charge access to European standards requested in support of EU policies and legislation. Such standards should be provided in accessible formats for persons with disabilities.
The revised Public Procurement Directive is expected to restate the obligation to buy accessible goods and services.	Positive. However, not new. The proposal is expected after the summer 2026. It is positive that the Commission commits to maintain this provision, but it will be more positive if the revised Directive maintains and strengthens other disability-related provisions.	Strengthen accessibility provisions and other elements relevant for disability support services in the revised Public Procurement legislation.

2. Enjoying EU rights

Facilitating mobility within the EU

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – European disability and parking cards in your (digital) wallet. This initiative aims to ensure the cards become a reality in the EU, meaning all EU residents with disabilities should have them in their (digital) wallets. This will require: (i) QR codes for the physical versions of the cards, features to ensure security of the cards and prevent fraud, and interoperability requirements for readability across the Member States; (ii) accessible digital versions of the cards and related interoperability arrangements; (iii) communication efforts to raise awareness of the benefits of the cards; and (iv) assessment of remaining gaps related to the free movement of persons with disabilities.	Neutral. Not new. All the actions were included in the European Disability Card and Parking Card Directive. Deliverable (i) is covered by the recently adopted delegated act, deliverable (ii) will be covered by the implementing act foreseen in the Directive, and deliverables (iii) and (iv) are provisions of the adopted legislation.	Participate actively in the assessment of remaining gaps related to the free movement of persons with disabilities with the aim of advocating for a new Directive ensuring the freedom of movement of persons with disabilities.
Encourage mutual learning on disability assessment methods among the Member States.	Positive points: • Will potentially help to encourage reforms in Member States where systems have been criticised by the UNCROPD Committee. Negative points:	Needs to address issues such as: • Involvement of persons with disabilities in their own assessment. • Based on person's individual needs.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	• Vague about the incentives for improving disability assessment processes. • Does not mention anything about addressing the ongoing issue of disability assessment for persons with disabilities moving from one Member State to another and the gaps in disability support this causes.	• Moving away from 'means testing' and reducing disability support based on partner's or family's income. • Reducing over strenuous processes and reassessment that is done too regularly. Need to ensure that there is follow up on this initiative that results in actual improvements in assessment processes in the Member States.

Fostering participation in democratic processes

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Inclusive democracies across the EU. The Commission will work with Member States in the framework of the European Cooperation Network on Elections towards the following deliverables: (i) updating the Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process; (ii) promoting common references and standards for inclusive elections via the repository provided for in the European Democracy Shield; and (iii) sharing good practices within the European Cooperation Network on Elections on disability-relevant elements	Positive points: • The Guide on good electoral practices (i) was a useful document published in all EU languages with substantive inputs from EDF and its members. • The repository of the Democracy Shield (ii) can also be useful for Member States election authorities. Negative points: • The Commission recommendation mentioned in deliverable (iii) is not in line with the CRPD as it legitimises potential disfranchisement of certain citizens with disabilities.	EDF and its members to contribute to the Commission updated Guide and repository and use it to advocate for the removal of legal and practical barriers to participate in elections.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
of the Commission Recommendation on inclusive and resilient electoral processes and the Commission report on 2024 elections to the European Parliament.		
Continue efforts including by working with stakeholders and through communication actions to promote the rights of persons with disabilities to vote and run for office in the 2029 European elections.	Neutral. This action is vague, which hinders any real evaluation of it.	Clarify which stakeholders (European/national political parties and disability organisations, media, election authorities, election observers, etc.) and participate in the communication actions.

3. Decent quality of life and living independently

Developing independent living and reinforcing community-based services

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – EU alliance for independent living. The Commission will encourage Member States and stakeholders to exchange information, promote data collection and dissemination and raise awareness of factors that contribute or hinder the deinstitutionalisation process. The initiative will include: (i) setting up an	Positive points: The focus on setting up national and local centres for independent living is very positive and should greatly facilitate deinstitutionalisation (DI) in the Member States if done correctly.	- Make sure monitoring and data collection on the de-institutionalisation process is done on a regular basis so we have an up-to-date view of progress. - Set time-bound targets for the creation of centres for independent living to avoid under-delivery, and ensure support for

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
alliance of policymakers and stakeholders to facilitate the creation of national and local centres for independent living, leveraging on EU funding; (ii) monitoring the deinstitutionalisation process in Member States and providing a cost-benefit analysis; and (iii) conducting an independent living implementation dialogue.	• Leveraging EU funding to do this shows a practical vision for how the action will be implemented. • It is very significant that the alliance will better monitor DI in the Member States so this can be tracked and progress clearly measured. • More detailed cost-benefit analysis could be a useful tool to encourage national and regional governments to move ahead with DI. Neutral points: • The flagship initiative cannot guarantee that the Alliance will result in concrete outcomes that facilitate the transition from institutions to community-based services and independent living. • Conducting an independent living implementation dialogue is very vague.	their running and activities rather than just their creation.
Encourage innovative solutions for independent living through EU funding, in particular through Horizon Europe and the cohesion policy funds and policy programmes, as well as their successors under the multi-annual financial framework after 2027.	Positive points: • Directing EU funding towards independent living will help mitigate problems caused by under-investment at national and regional level. Negative points: • It is unclear how this will be encouraged and if there are any	• More details on how this will be encouraged. • Inclusion of clear wording in the EU funding regulations on investing in institutionalisation and supporting independent living and inclusion in the community. • Ensure clear plan for how National and Regional Partnership Plans

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	expectations of the amount of EU funding that will go towards this aim.	will be reviewed and approved by the Commission, and for informing the services in the Commission to pay particular attention to monitoring the focus on DI.
The Commission will present the framework for social services of excellence for persons with disabilities announced under the strategy, ensuring synergies with the update of the Social Protection Committee EU voluntary quality framework for social services.	Neutral. Not new. This action was a flagship initiative foreseen for 2024.	Follow up on the inputs provided by EDF in the development of this initiative.

Improving access to sustainable quality jobs

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Improve implementation of the Disability Employment Package. The Commission will work for better access to the labour market for persons with disabilities building on the Disability Employment Package and with the involvement of social partners. The follow-up will include: (i) sharing best practices and issuing further guidance, e.g. on AI and assistive technologies at the work place, transition from education to employment, employment of women with disabilities; (ii) assessing the extent to which reasonable	Positive points: • The last point of the flagship initiative concerning the activation of persons excluded from the labour market could lead to a legislative proposal. • It is useful to have an assessment of how well the Employment Equality Directive is being implemented. • Cost-benefit analysis of boosting employment of persons with disabilities can result in a persuasive tool to encourage	• In addition to social partners, ensure that organisations of persons with disabilities are also involved in the consultations concerning a potential initiative for labour market activation. • Continue using the Employment Sub-Group of the Disability Platform to give input to this work. • Plan internally for how this new learning can be channelled into a concrete policy proposal to address the issues.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
accommodation is provided at the workplace, in line with the Employment Equality Directive; and (iii) publishing, together with the OECD, a cost-benefit analysis of boosting employment of persons with disabilities. Moreover, the Commission will consult European social partners on the possible direction of EU action to support the activation of persons excluded from the labour market.	policy makers to act on removing barriers to the labour market. - The focus on AI, and on women with disabilities in the workplace, will be very useful for our understanding of barriers faced by persons with disabilities in the modern labour market. Neutral points: - It is still heavily focused on a continuation of research and theoretical approaches to understanding employment issues faced by persons with disabilities. Negative points: - The actions proposed come at the expense of practical initiatives that the disability movement had been calling for such as the Disability Employment and Skills Guarantee.	
Work with the Council's Social Protection and Employment Committees on the setting of national targets for the employment of persons with disabilities.	Positive points: This will be a real step forwards in the accountability of Member States for improving employment outcomes of persons with disabilities. It must be coupled with a focus on the quality of this employment and not seek to increase employment rates through the placement of persons	- Make sure the targets take into account not only employment rates but also quality of employment and a focus on the open labour market. - Ensure the targets are time bound and will be monitored carefully to see how well Member States are working to achieve them.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	with disabilities in sheltered workshops. Neutral points: • The first half of the strategy already called on Member States to set up employment targets and this was not done by all of them, so this action is more a response to the inaction of the Member States over the past 5 years.	
Promote the inclusion of persons with disabilities at the workplace within the EU Platform of Diversity Charters.	Positive points: • It will be positive to reinforce the place of disability in these Diversity Charters, and to publicise their existence to encourage employers to sign up to it. Negative points: • It is not a strong action with binding or particularly reliable outcomes. It is a soft measure with limited potential to bring about change.	Follow and promote the outcomes of this action if positive.
Consider the occupational safety and health risks faced by workers with disabilities in the forthcoming Quality Jobs Act proposal.	Positive points: • This is linked to a legislative proposal which can result in binding measures that will have tangible improvements on the lives of working people with disabilities. Negative points:	• Make sure the disability aspects of the Quality Jobs Act go beyond occupational safety and focuses on quality of employment of persons with disabilities in a more holistic sense. • The Act will need to have a much greater focus on disability than simply focusing on health risks. It

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	It only focuses on “occupational safety and health risks” instead of all working conditions.	must also address the low-quality jobs and working conditions that too many persons with disabilities face, including those who are working in sheltered workshops.

Ensuring adequate social protection

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Analytical work and collection of data to quantify the extra cost of living with a disability and encourage discussions among Member States, including in the Disability Platform, on how disability is identified and addressed in different social protection systems	Positive. This kind of data is something that is very much missing and that the disability movement has been calling for for some time. It will be a helpful tool to start discussions on what is adequate in terms of disability allowance, and whether disability allowance should be retained when a person gains income from other sources.	- To collaborate with disability organisations on this, particularly those who have already done extensive work on cost of living. - Support data collection disaggregated by type of disability.

Affordable and accessible housing

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Consider accessibility aspects in assessment of national building renovation plans under the Directive on energy performance of buildings and identify and disseminate good practices.	Positive points: This focus on accessibility in the national building renovation plans is crucial and responds to calls the disability movement has been making regarding the EU’s policy on housing.	Request Member States to incorporate accessibility in their national renovation plans and publish a report highlighting good practices.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	Negative points: The wording of this action point does not offer a lot of reassurance. We need accessibility to be systematically reviewed in the national building renovation plans and to be a central part in their assessment. Besides, it does not specify how the Commission will disseminate such good practices.	
Issue a specific report that will cast light on the housing conditions of persons with disabilities across the EU.	Positive points: - This could be a welcome and important action. While we already have some data on the housing situation of persons with disabilities in the EU, thanks to Eurostat's disability Database, there is a lot of information we still lack at European level. Neutral points: - Reports on housing for persons with disabilities have recently been released as part of the European Disability Expertise (EDE) research tender. This new report should ensure it does not reproduce the learning that was gained from those reports. If this action actually refers to the	- Make sure the report delivers new and useable learning on housing issues for persons with disabilities, and builds on existing research done by the European Disability Expertise. - Ensure the report casts lights on lived realities rather than a focus on housing legislation, which we already have easy-to-find information on via the DotCom web page. - Make the research as empirical as possible, with input from experts across the EU to ensure it is representative of people throughout the Union.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	already-released to the EDE report funded by the European Commission, it should be made clear that it is not a new action.	
Support a comprehensive framework for reforms, investments and interventions in the areas of sustainable, accessible, social and affordable housing and built environment, in conjunction with the New European Bauhaus, the European Affordable Housing Plan, the Citizens Energy Package and the anti-poverty strategy, considering the direct and indirect impact on persons with disabilities and reflecting accessibility obligations.	Positive points: - It is important to support investment in accessible, social and affordable housing by any means possible. The inclusion of the New European Bauhaus in particular makes a link to a potential source of EU funding for such a framework. Negative points: - This action is vague on what this comprehensive framework will look like and how it actually plans to ensure necessary reforms, investments and interventions.	Bring clarity to how funding can be accessed and how these initiatives can complement each other in practice. The Commission should streamline their work internally and coordinate better between the different services to ensure alignment between the challenges and actions laid down in the 2 nd phase of the Disability Strategy, and the actions under the EU Affordable Housing Plan.

4. Equal access and non-discrimination

Inclusive education at all levels

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Disability-inclusive lifelong learning. The Commission will further support Member States in fostering accessible and inclusive education at all levels,	Positive points: Deliverable (iii) of a concrete policy initiative on access to higher education is promising and could result in changes that are	Advocate for the policy initiative in 2027 to become reality, for it to be ambitious (within the EU's area of competence on education), and for it to reflect the needs outlined by persons with

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
through a life-cycle approach. The initiative will include: (i) guidance for curriculum and pedagogical development in early childhood education and care to support the acquisition of basic skills early on and to encourage detection of developmental delays and related interventions; (ii) guidance for policymakers, as part of the 2026 Education Package, addressing, amongst other, the needs of vulnerable groups at school, including pupils with disabilities; (iii) a policy initiative in 2027 to improve accessibility of higher education to a wider range of learners, including students with disabilities, and promote support services for students' wellbeing; (iv) a report in 2028 on enhancing inclusive education, with a focus on students with disabilities and special educational needs and the provision of reasonable accommodation; and (v) prioritisation of mutual learning on disability inclusive education in the context of the European Education Area strategic framework in cooperation with the European Agency for Special Needs and Inclusive Education.	tangible and felt directly by persons with disabilities. Neutral points: Beyond the potential policy initiative in 2027, the actions are soft measures. Policy guidance and reports on inclusive education might end up reiterating things that national and regional policy makers already know.	disabilities and their representative organisations.
2030 Roadmap on the future of digital education and skills, where the Commission will strive to ensure that all	Positive points: It is important that the Commission sees the need for all	Set aside a clear budget to accompany this roadmap, and to make its aims achievable.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
pupils can benefit from the digital transformation in schools, supporting Member States in developing shared digital infrastructure for education in line with EU values. This will include ethical and equality-sensitive use of AI and the deployment of safe European education technologies that can cater for the diverse accessibility needs of pupils.	learners to be included in the digital transformation within schools, and to make accessibility for learners with disabilities central to actions in this area. Negative points: The announcement of a roadmap does not clarify exactly how the Commission plans to do this, particularly taking into account that EU accessibility legislation does not comprehensively cover digital tools in education settings.	Cover digital technologies used in education in EU accessibility legislation.

Improving access to healthcare

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Guidelines on access to healthcare for persons with disabilities to foster a shared understanding of challenges in access to healthcare for persons with disabilities and encourage good practices likely to drive changes at national level.	Positive points: - The guidelines and supporting study activities were conducted with the active involvement and consultation of organisations of persons with disabilities. - The guidelines largely reflect the principles of the CRPD, encouraging healthcare reform that protects and promotes the rights of persons with disabilities to health, rehabilitation, and equal recognition before the law, among other things.	Establish a framework to support Member States in the uptake and implementation of the guidelines including awareness raising, exchange of good-practices, and dedicated financial support for actions aligned with the guidelines.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	Negative points: • This action is not new. It refers to an action that has already been done. • There are no dedicated frameworks or actions to support the implementation of the guidelines.	
Revised Pharma Package to help make orphan drugs against rare diseases more accessible.	Positive points: • The revised rules have the potential to improve the availability and affordability of medicines, including orphan medicines for rare diseases. • Basic medicinal product information will be provided on packaging in Braille. Neutral points: • Revision of medicine package leaflets shall be revised in consultation with target patient groups. This could improve the accessibility and relevance of information provided persons with disabilities are included in target groups. Negative points: • This is not a new action as it has already taken place. • Member State discretion will determine the availability of medicine product information in	• Actively include persons with disabilities in target groups revising medicine package leaflets and assessing the appropriateness of exclusive electronic information. • Ensure that the process to obtain paper product information does not create additional barriers nor delay access for persons with disabilities.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	various formats. They may enable exclusive electronic provision of product information for some or all medicines. While paper versions will remain available upon request, the process constitutes an additional barrier to vital information for persons with disabilities, especially where it must be requested by a patient organisation. Similarly, there are no clear references to accessibility requirements for electronic product information or for package elements connecting to electronic information (e.g., QR codes).	
Revision of the Medical Device and In Vitro Diagnostics Regulations, together with the proposal on the Biotech Act, to foster research and innovation in the field of rare diseases.	Neutral points: • This is not a new action. Negative points: • The revision of the Medical Device and In Vitro Diagnostics Regulations did not account for the needs of persons with disabilities, with standards and/or requirements for manufacturers on accessibility and adaptability. Lack of accessible medical devices remains a key barrier to care and results in worse health outcomes for persons with disabilities.	Establish design criteria for medical diagnostic equipment including examination tables and chairs, weight scales, radiological and mammography equipment, and other diagnostic tools used by healthcare professionals.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Study on the quality of life of cancer patients and survivors, developing indicators to assess policies implemented across EU countries to monitor and improve quality of life, likely to encompass policies relevant for disabilities acquired following to cancer.	Positive points: - Focus on Patient-Reported Outcome Measures for the assessment of quality of life for cancer patients and survivors. Negative points: - Not enough information to confirm the action; analysis based on the assumption that the study is represented by the EUonQoL project. - Disability and health equity are not distinct research priorities. Previous research indicates numerous and specific barriers for persons with disabilities in cancer diagnosis, treatment, care and clinical trials. Without an explicit focus, it is unclear how or even if persons with disabilities were involved in research development or activities including pilots.	- Evaluate study outcomes against the 'Study report on people with disabilities regarding their access to screening programmes, diagnosis and treatment for cancer, barriers in accessibility and affordability of cancer care for disabled patients, and differences in the quality of care they receive'. - Ensure subsequent actions actively involve organisations of persons with disabilities.

Disability at the intersection: boosting voice and choice

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
initiative in cooperation with the World Health Organisation to explore ways to improve the quality and accessibility of	Neutral. It is important that the Commission address access to healthcare by women	Ensure explicit and targeted actions in relation to women's health for women with disabilities. It should include access

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
women's healthcare, including for those with disabilities.	with disabilities, however the action is also not clear.	to sexual and reproductive health and rights, based on autonomy and consent.
Study on violence against women with disabilities in the EU.	Positive points: • That such study will be conducted and adopted. Negative: • It is disappointing that no other actions were included, and there are no mentions to forced sterilisation, one of the key campaigns of EDF. • The Commission fails to ensure the inclusion of disability organisations in relevant fora, such as the network on the Istanbul Convention and its network on prevention on violence against women.	• The study should include forced sterilisation of women with disabilities. • It should be used for the implementation of the Directive on violence against women and Istanbul Convention, and for future revision of the Directive. • Inclusion of representative organisations of persons with disabilities in relevant expert groups focused on violence against women.

Ensuring equal access to justice, legal protection and safety

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Victims with disabilities to be further protected and supported through (...) the upcoming EU strategy on victims' rights.	Neutral. Not new. A new Victims' rights strategy is needed for the implementation of the revised directive, and to address remaining gaps in protection of victims' rights in the EU.	EDF will provide more details demands in the preparation of the new victims' rights strategy. The focus should be on the implementation of the revised Directive, and furthering awareness raising and training of professionals.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Guidelines on procedural accommodation for all victims with disabilities.	Very positive. A demand from EDF.	Adoption of detailed guidelines on procedural accommodations to support EU Member States in transposing and implementing the revised Victims' Rights Directive.
Review of the European Investigation Order Directive to seek to enable remote participation in criminal court hearings, including of persons with disabilities, from another Member State via accessible videoconference technology, ensuring the necessary procedural safeguards.	Positive. The revision of this Directive could positively impact persons with disabilities.	Include a binding provision of accessibility for remote participation of persons with disabilities, and safeguards to ensure fundamental rights in the Directive.
Increase the frequency of reporting on disability issues in the EU Justice Scoreboard.	Positive. This will facilitate monitoring of inclusion in the national justice systems.	Advocate for yearly reporting on disability issues in access to justice through the Scorecard. It could for example look at procedural accommodation available for persons with disabilities.
Support Member States' implementation of the upcoming Regulation on cross-border protection of vulnerable adults, promoting application in full compliance with the UNCPRD	Neutral. It is not clear how the Commission will support the application of the Directive in line with the CRPD.	Monitor that the European Commission only promote measures that comply with the CRPD, as there is the risk that some measures that do not comply with the Convention, will be presented as such, in which case an infringement procedure should be launched by the Commission.
Publish a study on decision-making regimes and legal capacity legislation in	Very positive:	The study should be conducted by, or with active involvements of

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
the Member States, showcasing supported decision-making approaches to encourage self-determination of persons with intellectual, mental and psycho-social disabilities.	- EDF has been called for the adoption of such study which could support implementation of legal reforms in support of legal capacity. Negative points: - Not a strong political instrument. - The reference to “mental” disability. Not clear which group the Commission refers.	organisations of persons with disabilities and services providers. It should lead to presentation and peer exchange with Member States and pave the way to the adoption of an EU Recommendation on the topic.
Consider legislation based on the existing areas of crime covered by Article 83(1) of TFEU to harmonise the definition of hate offences committed online and possibly include public incitement to violence or hatred online on grounds not currently covered by EU law, such as disability.	Positive points. - EDF has been calling for further action to address hate speech and hate crime faced by persons with disabilities. Neutral points: - Not new. It was already included in the LGBTIQ+ Equality Strategy 2026-2030.	- The Commission should launch a legislative initiative to combat hate speech and hate crime against persons with disabilities and on a variety of grounds. - Further discussion among EU countries should be organised.
Disability to be mainstreamed in the forthcoming action plan on the protection of children against crime and strategy on combating trafficking in human beings, as well as in the pact on asylum and migration.	Neutral. no clear action.	Advocate for concrete actions to better ensure the rights of migrants with disabilities in the Pact on asylum and migration, as well as the involvement of the EU Asylum Agency.

Preparedness and emergency management

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – Prepared for anything, prepared for everyone. The Commission will seek to make preparedness and crisis management more disability inclusive. The initiative will include: (i) gaps analysis and stakeholder mapping of the situation of persons with disabilities in terms of disaster response and preparedness; (ii) guidelines for first responders, including emergency number 112 operators, and for persons with disabilities and their carers on how to act in an emergency; (iii) training curricula for first responders on how to recognise a type of disability and determine the appropriate course of action; and (iv) awarding a civil protection medal at the Civil Protection Forum for 'extraordinary contribution to the UCPM in the field of disability inclusion' in 2026.	Positive points: - EDF welcomes this flagship initiative that recognises the need for disability-inclusive preparedness and emergency management. We have contributed to the development of the gap analysis and stakeholder mapping, and EDF members and partners were actively consulted during the development of the guidelines. Negative points: - The three main operational initiatives (gap analysis and stakeholder mapping, guidelines, and training curricula) were already foreseen in the Action 33 of the Preparedness Union Strategy (2025). The Disability Strategy therefore appears to repackage existing commitments rather than introducing new disability-specific actions, funding or accountability mechanisms. - The initiative focuses on guidance, training and mapping and does not establish binding requirements or minimum accessibility standards for	- Ensure the guidelines and training are systematically implemented across Member States, with the meaningful involvement of organisations of persons with disabilities. - Develop clear monitoring and follow-up mechanisms to assess implementation and impact. - Promote accessibility and inclusion as core requirements in all EU preparedness and emergency response measures. - Involve disability organisations in the assessment of candidates to the civil protection medal in the field of disability inclusion. Other actions to be considered: - Request Member States stockpiling of critical equipment and materials specific to persons with disabilities; - Promote that persons with disabilities have Personal Emergency Plans. - Include persons with disabilities in regular EU-wide preparedness exercises, uniting armed forces, civil protection, police, security,

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	emergency preparedness and disaster response across Member States. • No information on how the guidelines and training curricula will be implemented, promoted or monitored after 2026. • No explicit commitment to dedicated funding or to systematically involving OPDs in the implementation and evaluation of the initiative.	healthcare workers, and firefighters. • Work with OPDs beyond the development of guidelines, and as permanent preparedness partners, involving OPDs in risk assessments, community contingency planning, preparedness exercises, evaluations etc.
Promote a stronger and more inclusive culture of preparedness in line with the Preparedness Union Strategy and making use of the Union Civil Protection Mechanism (UCPM).	Neutral. • No new actions. It remains unclear how a “culture of preparedness” will translate into tangible improvements for persons with disabilities, and how the Union Civil Protection Mechanism will be used.	• Ensure disability inclusion is systematically integrated into all preparedness activities and related funding under the Preparedness Union Strategy and the UCPM. • Set minimum standards for the involvement of organisations of persons with disabilities in preparedness planning, exercises and evaluations. • Prioritise the collection and analysis of disability-disaggregated indicators and data within member state reporting during emergencies to monitor outcomes and improve future preparedness planning.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
		• Ring-fence EU preparedness funding for disability-inclusive preparedness measures and capacity-building of OPDs. • Embed disability inclusion as a key part of the minimum preparedness criteria for essential services such as hospitals, schools, transport, and telecommunications.

Participation in cultural life, sport, travel and leisure

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
By 2028, report to support Member States in increasing the participation of persons with disabilities in culture.	Neutral. New action, although non-binding and soft measure.	Advocate for stronger measures, including legislative initiatives and funding programmes, which facilitate the access and participation of persons with disabilities in culture.
Organisations representing persons with disabilities to be consulted on the forthcoming EU Artists Charter.	Positive point: • It is positive that organisations of persons with disabilities will be involved in this. Neutral point: • Unclear at what stages the consultation will happen and if the consultation will allow for substantial changes.	Make sure that consultation is meaningful, that it happens at stages in the process that will allow for consultation to actually have an impact on the final product.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Support of young persons with disabilities through the DiscoverEU Inclusion Action.	Neutral. Not a new action.	Promote this initiative among young persons with disabilities.
Promoting inclusion and accessibility in sport, including through the #BeActive EU Sport Awards "Inclusion" category and the European Week of Sports campaign.	Neutral. Not a new action, although it is positive to sports	Avoid examples of sports inclusion that are too charitable or 'inspirational' and focus instead on genuine inclusion in sports that facilitates meaningful and respectful community inclusion at the same time.

5. Promoting the rights of persons with disabilities globally

External action

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
The Commission will also continue to cooperate with the UNCRPD Committee including by supporting membership of EU experts in the Committee.	Neutral. Not new action.	Whereas it is positive that the EU as CRPD state party presents candidate members to the CRPD committee, the selection process should involve and include the European disability movement.
Review of the EU action plan on human rights and democracy 2020- 2027 to place a stronger emphasis on disability.	Positive point: - Stronger disability mainstreaming in EU external action. Negative point: - While stronger disability mainstreaming is welcome, there	Ensure the revised Action Plan adopts a CRPD-compliant human rights-based approach, combining disability mainstreaming with targeted actions.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	is a risk that disability becomes diluted within broader human rights and equality objectives if it is not accompanied by specific commitments, targets and dedicated actions. The strategy does not clarify how disability rights will be systematically prioritised and monitored within the revised Action Plan.	• Integrate disability rights across programming, human rights dialogues and cooperation frameworks, with meaningful participation of OPDs. • Back commitments with dedicated funding and clear monitoring and accountability mechanisms, including support for OPDs. • Ensure accessibility and disability inclusion are systematically integrated across EU external action, including through disability focal points in EU Delegations. • Ensure the meaningful participation and adequate resourcing of local organisations of persons with disabilities throughout the design, implementation and monitoring of EU external action.
Enhance disability inclusion in Global Gateway investments and promote accessibility in infrastructure programmes, including in post-conflict reconstruction and recovery.	Positive point: • It steps forward the demand to strengthening disability inclusion and accessibility in EU external investments, and the focus on post-conflict reconstruction and recovery. Negative point: • There is no commitment to systematically apply accessibility	• Ensure accessibility and disability inclusion are mandatory requirements throughout the Global Gateway investment cycle. • Ensure the meaningful participation and adequate resourcing of local organisations of persons with disabilities throughout the planning,

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	and disability inclusion requirements throughout the project cycle, including procurement, monitoring and evaluation.	implementation and monitoring of Global Gateway investments.
Reporting on disability mainstreaming and targeted actions, using the OECD Development Assistance Committee disability marker to track disability inclusive funded operations.	Positive point: - Introduction of the OECD DAC disability marker is a positive step towards improved monitoring and transparency of disability-inclusive EU external action. Negative points: - The action does not explain how this information will be used to improve programmes that show weak or no disability inclusion, nor commits to continuous progress.	- Publish regular, transparent reports on disability marker data. - Use the findings to improve programming, accountability and funding decisions, and involve OPDs in monitoring implementation.

Humanitarian aid

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Strengthen disability inclusion in all EU-funded humanitarian operations and support partners and staff in this respect.	Positive point: We welcome the commitment to strengthen disability inclusion across EU-funded humanitarian action and to build the capacity of humanitarian partners and staff. Negative points:	- Ensure full implementation of existing EU and international guidance on disability-inclusive humanitarian action. - Ensure meaningful and continuous participation of OPDs throughout humanitarian preparedness, response and recovery to ensure

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	• The action does not clarify how disability inclusion will be implemented in practice, monitored, or adequately resourced across humanitarian operations. • It also does not explicitly recognise the role of local organisations of persons with disabilities in humanitarian preparedness, response and recovery.	that interventions are inclusive, accessible, and effective for persons with disabilities. • Establish monitoring and adequate funding to support disability-inclusive humanitarian action.
The commitment to disability inclusion will also be reaffirmed through the upcoming Communication on EU humanitarian action in a shifting global order, to ensure that persons with disabilities are meaningfully engaged and their needs duly considered in humanitarian diplomacy initiatives and promote inclusive humanitarian action in the current global context.	Positive points: • The commitment for participation of persons with disabilities and promotes inclusive humanitarian action. • The already published Communication does include key successes for persons with disabilities. Negative point: • Neither the strategy nor the Communication detail the steps that will be taken to remove the structural, social, economic and attitudinal barriers persons and organisation of persons with disabilities face in accessing EU funds and influencing policy dialogues.	Develop concrete measures to remove the structural, social, economic and attitudinal barriers that prevent persons with disabilities and organisations of persons with disabilities (OPDs) from accessing EU funding and meaningfully influencing humanitarian policy and decision-making.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation

EU enlargement

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Flagship Initiative – ‘Nothing about us without us’ in Ukraine’s reconstruction. The Commission will support disability-inclusive rebuilding efforts in Ukraine. The initiative will include: (i) a high-level event focusing on accessibility as part of one of the Ukraine reconstruction conferences in 2027; (ii) involvement of disability organisations in participatory processes for the design and implementation of New European Bauhaus projects related to the reconstruction of Ukraine; and (iii) leveraging EU funding for accessibility in reconstruction.	Positive points: • The commitment recognises the importance of embedding accessibility and disability inclusion from the outset of reconstruction efforts, the involvement of disability organisations, and leveraging EU funds. Negative points: • The flagship relies heavily on a conference in 2027 and participatory processes without establishing clear accessibility requirements or accountability mechanisms. • It remains unclear how disability inclusion will be systematically integrated across all reconstruction investments and funding streams. • There is no commitment to measurable targets or monitoring of disability-inclusive reconstruction outcomes.	• Ensure accessibility is systematically integrated into all EU-funded reconstruction projects. • Guarantee the meaningful participation of Ukrainian organisations of persons with disabilities in the design, implementation and monitoring of reconstruction efforts. • Establish clear indicators and monitoring mechanisms for disability-inclusive reconstruction. • Ensure engagement with the Ukrainian counterparts and link an inclusive recovery with accession process.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Support partner countries and assess their progress in the alignment and effective implementation of relevant policies, including through the annual Enlargement Package.	Positive point: - Disability rights being assessed as part of the enlargement process can encourage candidate countries to strengthen implementation of the CRPD and align with EU disability acquis Negative points: - The action does not clarify how disability rights will be assessed or weighted within the enlargement process. - It is unclear whether disability-specific findings will influence enlargement recommendations and country assessments. - The action focuses on monitoring progress but does not identify specific support measures to address shortcomings.	- Ensure disability rights and CRPD implementation are systematically assessed within the Enlargement Package and accession process. - Include dedicated reporting on accessibility, independent living, non-discrimination and political participation of persons with disabilities. - Support organisations of persons with disabilities in candidate countries to engage in accession-related reforms and monitoring.
Candidate and potential candidate countries to be involved in the work of the Disability Platform as well as in other relevant actions under the enhanced strategy.	Positive points: This is a positive move that reflects calls from the disability movement. It will better prepare future EU Member States for alignment with the EU's expectations and their implementation of existing EU	Ensure active participation from representatives of accession countries within the platform.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	legislation relative to persons with disabilities. Neutral point: Participation alone will not guarantee improved implementation of disability rights unless candidate countries are given adequate support, resources and opportunities to contribute meaningfully to the Platform's work.	

6. Efficiently delivering the strategy

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Upscale the Disability Platform by strengthening the exchange of information on national developments. The Platform will support Member States to identify challenges and remedial action in preparing and implementing disability plans and strategies feeding into their national and regional partnership plans under the multiannual financial framework after 2027 (pending adoption).	Positive. The involvement of the Platform and the focus on ensuring challenges for persons with disabilities are addressed in the National and Regional Partnership Plans (plans for the use of EU funds as of 2028) will be particularly useful. It will be a practical tool to ensure that EU funds are used in line with the CRPD, and do not further segregate persons with disabilities. Neutral. It is unclear how this action will be operationalised.	Make sure that enough time and attention is foreseen in Platform meetings to discuss how disability-related challenges are addressed in National and Regional Partnership Plans. Ensure that Commission services assessing and approving the NRPs are part of these discussions and are briefed on challenges for persons with disabilities raised during Platform meetings. These should be taken into account during the NRP assessments and any Member States whose plans ignore these issues should be supported by the Commission in making

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
		amendments to their plans before approval.
Continue to promote involvement of the disability community in policymaking at all levels in line with the EU strategy for civil society.	Neutral. We cannot talk about a strong action here, since the description of the action is fleeting and very vague.	Ensure participation of representative organisations of persons with disabilities in the Civil Society Platform and in all policymaking across relevant EU institutions.
Support organisations working for disability inclusion under the AgoraEU programme under the 2028-2034 multiannual financial framework (pending adoption).	Positive. This is a crucial measure to ensure the continued involvement of persons with disabilities and their representative organisations in EU policy making.	Ensure that the amount of funding available is sufficient to enable meaningful activities by organisations working for disability inclusion. Be sure that the regulation for AgoraEU does not in any way restrict the scope of the work of disability organisations and their ability to conduct advocacy work related to EU legislation.
Work for increased disability mainstreaming in all EU institutions, bodies, offices and agencies, with action across EU agencies, focusing on raising awareness, and in the context of its Better Regulation methodology.	Neutral. • Other than raising awareness, there is very little explanation about what 'disability mainstreaming in the EU institutions' means. • Raising awareness is a very soft approach and there is little clarity on how this will actually reach EU institutions.	Making sure this action goes beyond awareness raising.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Reform the existing EU UNCRPD monitoring framework by 2028.	Very positive. Important measure that EDF and the CRPD Committee requested.	• Ensure that the EU UNCRPD monitoring framework functions better and is adequately resourced. The European Parliament should be removed as full member. And the powers and responsibilities of the EU CRPD monitoring framework should be strengthened. • EDF will set a clear position on the reform following the publication of its upcoming Human Rights Report on CRPD monitoring mechanisms.

7. Leading by example

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Promote the participation of persons with disabilities in the Blue Book traineeship programme in the context of the upcoming revision of the decision on the Blue Book traineeship.	Positive point: • This is a very welcome move that will bring the European Commission closer to the level of inclusiveness for trainees that we see in the European Parliament and the Council of the European Union. Negative point: • No indication is made yet of whether this promotion will extend to actually offering more	• Offering extra financial and logistical support to trainees with disabilities arriving in Brussels – including personal assistance when needed. • Better preparing colleagues in the Commission to welcome trainees with disabilities.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	support to trainees with disabilities who move to Brussels and will likely encounter barriers both in and outside of working hours.	
European Personnel Selection Office (EPSO) to strengthen the accessibility of its communication and selection procedures, ensuring equal opportunities for candidates with disabilities, including through its reasonable accommodation policy.	Positive. This is a much-needed initiative and will hopefully pave the way for more persons with disabilities having access to career opportunities within the EU institutions.	Respond swiftly to candidates requesting reasonable accommodation and explain to them well in advance what the reasonable accommodation with entail, to enable candidates with disabilities to adequately prepare for the exam conditions.
EPSO to further enhance its targeted outreach through cooperation with EU disability and diversity organisations to attract a more diverse pool of candidates.	Positive. An important initiative, but that must be mirrored with real measures to ensure reasonable accommodation during the selection process.	Offer more clarity to candidates on what reasonable accommodation they can expect, in order to inspire confidence in the process and encourage them to apply for EU competitions.
Commission to update its Diversity and Inclusion Action Plan building on the findings of a survey conducted in 2025. It will further develop initiatives to raise awareness, deliver training to staff and managers, fight unconscious biases and improve digital and physical accessibility as well as reasonable accommodation. The Commission will also regularly engage with staff associations to further foster inclusion at the workplace.	Positive point: - The points on digital and physical accessibility and reasonable accommodation will be very helpful, as well as the engagement with associations of staff with disabilities. Negative point: - Little indication is given on how this will be achieved and what will happen should there be no proven	Set targets in the Diversity and Inclusion Action Plan on how many staff members will be reached by its actions, and meaningfully involve staff organisations of persons with disabilities in its development.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
	advances regarding diversity and inclusion in the Commission.	
Planned review of the EU Joint Sickness Insurance Scheme.	Neutral. Although the action is positive and has been long requested by staff with disabilities and the CRPD committee, no information is given about what this entails or what the planned review aims to achieve.	Involve disability support groups representing staff with disabilities in the reform of the EU Joint Sickness Insurance Scheme and provide comprehensive coverage for disability-related health needs.
Digital accessibility action plan (2026-2030) covering Commission's entire digital ecosystem.	Neutral. Not a new action. There is already a Web Accessibility Action Plan 2025-2030 in the EU Web Guide .	• It should be clarified whether this plan is the same as the Web Accessibility Action Plan 2025-2030 which is already active. • It should also be made public so other public entities can benefit from it. For example, when it comes to the Commission policy regarding overlays, which in the past was public.
Implement the infrastructure and buildings equality work plan (2021-2030), increasing awareness of physical accessibility among staff and relevant professionals. The Commission will aim at making meetings and events held in Commission conference rooms more accessible across all EU languages and deploy AI-based multilingual services.	Neutral point: • It is important to raise awareness among staff and professionals, but it is not clear what this work plan entails. Negative point: • No reference to making conferences more accessible through sign languages.	• Report on the status of implementation of the work plan and ensure no gaps remain. • Improve the accessibility of Commission conferences and meetings beyond spoken languages.

8. Awareness-raising, monitoring and measuring progress

Raising awareness and disseminating good practices

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Develop a new community of practice among cities of the Access City Award.	Positive. We welcome peer exchange among awardees.	Local organisations of persons with disabilities in those cities could also be put in contact to exchange.
Union of Equality campaign, which will also cover disability.	Neutral. A relatively soft action with limited potential to bring about meaningful change.	Such campaign should also reflect an intersectional approach and the wide diversity of the disability community.

Collecting data, monitoring and measuring progress

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Step up data collection and publish data for new indicators on the situation of persons with disabilities for various aspects of life through the dedicated EU statistical online gateway, and will strive to enhance data collection disaggregated by type of disability.	Very positive. This is very welcome and will greatly improve our understanding of the lived realities of persons with disabilities. Particularly positive is the ambition to have data disaggregated by type of disability, something that is severely lacking at EU level.	Ensure that this data is collected on a regular basis rather than as a one-off exercise, allowing us to better measure progress over time.

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
Issue a recommendation on equality data and organise a high-level roundtable to further promote their collection and use, building on the work of the equality data expert group of the High-Level Group on non-discrimination, equality and diversity.	Positive point: • Positive that this is being included and that a high-level roundtable and recommendations will be produced. Neutral points: • Not a new action. Negative points: • Little reassurance of whether the recommendations will be taken on board resulting in any improvements in equality data collection.	Follow up on the recommendations when they are issued and set out a plan for how they will be implemented and by which stakeholders.
Publish a new Eurobarometer on discrimination in the EU in 2027.	Positive points: • This is a much-needed update, in light of growing cases of discrimination on all grounds. Neutral points: • Not a new action.	• Ensure the Eurobarometer explores discrimination based on disability specifically. • Look at discrimination inside and outside of employment. • Make it possible to explore intersectionality between discrimination on the basis of disability, gender, age etc. • Make it possible to understand extent of discrimination by association (particularly for parents and family members of persons with disabilities).
Take further steps to promote data collection on persons with disabilities	Positive point:	Must ensure that this actually results in data on institutions being collected, and that the data collection happens

Action in the Disability Strategy	Evaluation by EDF	Priorities for implementation
living in institutions and associated costs.	• This responds to one of the ongoing demands of the disability movement for some time now. Negative point: • As of yet there is not a clear confirmation that this will actually result in new data collection in institutions, as the action simply mentions 'taking further steps to promote' such data.	regularly to allow for monitoring of the de-institutionalisation process in the Member States, and the situation of people living in these settings.

Document credits

This document was prepared as a joint effort by all EDF policy staff on the basis of their areas of work. It was consolidated by Haydn Hammersley, EDF Social Policy Coordinator, and Alejandro Moledo, EDF Deputy Director & Head of Policy.

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