



The voice of blind and partially sighted people in Europe

European Blind Union response to European Commission's public consultation on Roadmap for European Disability Rights Strategy 2021-2030

EBU Position Paper | October 2020

Background and aim of the consultation

The European Disability strategy aims to ensure that people with disabilities can experience full social and economic inclusion on an equal basis with others and live free from discrimination. It will focus on implementing the UN Convention on the Rights of Persons with Disabilities and consolidating the EU's body of law in this field.

The Commission is consulting on the roadmap for the preparation of the new European Disability Strategy post 2020. It will build on the 2010-20 strategy, both through targeted action and by ensuring disability rights are taken into account across all EU policies, programmes and instruments.

Introduction

EBU welcomes the EC roadmap for the post-2020 European Disability Strategy, the approach of which offers opportunities to meaningfully deliver to citizens with disabilities – if clear and ambitious objectives are adopted in each sector.

EBU would like to emphasize the following aspects, which will support tangible delivery of the Strategy (we hereafter refer to it as the "Agenda" as we would prefer it to be named) in the next 10 years.

Feedback

The Agenda should aim to implement and enforce the rights of persons with disabilities in the following areas:

1. Decent standard of living, with access to inclusive education, social inclusion and living in the community, employment and social protection (article 9 and 151 of the Treaty on the Functioning of the European Union - TFEU).
2. Equality for persons with disabilities in all fields, with guaranteed equal opportunities, protection against discrimination “based on gender, racial or ethnic origin, migrant status, religion or belief, age or sexual orientation” (article 10 and 19 TFEU and General Comment 6 of the UN Committee on the Rights of Persons with Disabilities), violence and abuse.
3. Freedom of movement, to live, work, travel and study in the EU, and to vote and stand for EU elections, as all other EU citizens (article 21 TFEU).

In addition, the EU should:

- Assume a global leadership role in promoting the rights of persons with disabilities at the UN level and in all its international cooperation strategies, policies and programmes, including humanitarian action; and
- Fulfil its obligations under the CRPD as public administration.

The Agenda should:

- Pave the way for the implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) and align with the EU treaties and the 2030 Agenda for Sustainable Development;
- Be comprehensive and include clear objectives, timelines, resource allocation, a governance and accountability mechanism, and full participation of persons with disabilities, including women and children, through their representative organisations;
- Use the CRPD as the basis of understanding disability policies and programmes, referring to the Convention itself, its Article 3 ‘General Principles’, and the CRPD Committee’s General Comments and recommendations;
- Draw on the current political priorities of the European Commission and the possibilities for EU and its Member States to take national harmonised actions; and

- Ensure disability is included in all policies and programmes in the Recovery plan for Europe.

Further, the Agenda should:

- Ensure full participation of persons with disabilities, through their representative organisations;
- Ensure that the 2015 Concluding Observations of the CRPD Committee are taken into account in all aspects of the EU's policies and programmes;
- Improve the data collected by Eurostat, especially disaggregating by impairments, socio-economic characteristics such as age and gender, and about persons with disabilities living in institutions;
- Take an intersectional approach recognising the multiple and intersectional discrimination on the basis of sex, age, ethnicity, religion or belief, sexual orientation and gender which, combined with disability, create specific barriers for these groups among the wider population with disabilities;
- Raise awareness about the CRPD;
- Establish coordination mechanisms to ensure a swift implementation of the Strategy and especially:
 - Create a CRPD unit (focal point) in DG for Justice and Consumers, under the direct supervision of the Commissioner for Equality, consistent with the way other equality issues such as gender equality are handled.
 - Place Disability Focal Points –which are in charge of mainstreaming disability rights in all relevant EU policies and legislations- in each EU institution, agency and body and all external EU delegations. Focal points should also be assigned to all Commission DGs.
 - Strengthen the technical capacity of all Disability Focal Points
 - Replace the current High-Level Group on Disability with a “Disability Rights Committee”
 - Set up an interinstitutional coordination mechanism between the Commission, Parliament and Council
 - Establish a European Access Board to ensure respect of accessibility in all EU policies
- Give the EU CRPD monitoring framework an independent budget and secretariat, as well as independence from EU institutions, in line with the UN Paris principles.
- Strategy monitoring and evaluation processes including:
 - Annually publish a progress report

- Conduct a scientifically supported mid-term review and independent final evaluation

As far as funding is concerned:

- The Multi-Annual Financial Framework (MFF) should include the perspectives of persons with disabilities throughout the financial framework and more specifically in various EU funding and budgetary guarantee instruments, in particular the European Social Fund Plus, the European Regional Development Fund, the Cohesion Fund, Horizon Europe, Erasmus Plus, the European Solidarity Corps, the Invest EU Programme, the Neighbourhood, Development and International Cooperation Instrument (NDICI), the Connecting Europe Facility, and the Shift2Rail Programme. The needs of persons with disabilities must also be directly addressed through the Coronavirus Response Initiative (CRI) and Coronavirus Initiative Plus (CRI+). The proposed 750€ billion Next Generation EU instrument, to boost recovery from the COVID-19 crisis, also needs to make persons with disabilities a specific target for investment, to ensure this group is not left behind as it was during the last crisis.
- A Disability Rights Guarantee should be established, similar to the Youth Guarantee, to incentivise and facilitate access to the open labour market. This initiative should ensure that all persons with disabilities who wish to work receive an offer of either employment, an apprenticeship, a traineeship or continued educational progression, establishing particular affirmative action plans to boost the activity rate of women with disabilities. Allow it to be open to persons receiving disability allocations and enable them to continue receiving their allocations when employed to offset the additional cost of living for persons with disabilities and avoid in-work poverty.
- EU funds should be invested in lifelong learning and training, as well as in facilitating independent living, in order to facilitate the preparation of persons with disabilities for the job market. EU funds can also go towards training of employers, educators, healthcare workers and other service providers to deliver person-centred support for persons with disabilities.
- The proposed Common Provisions Regulation should include specific “enabling conditions” requiring a Member State to have in place a national disability rights strategy as a precondition to make use of the funds when investing.

- Through the new Rights and Values and Justice programmes, it should be ensured that there is dedicated funding for civil society organisations. Attention should be paid to increase the allocation of funding of representative organisations of persons with disabilities in their full diversity and reaching the most excluded groups in society, at the EU and national level. The funding should enable us to meaningfully participate in decision making in line with article 4.3 CRPD. Particular attention should be paid to reducing the burden of co-financing and administrative requirements.
- Through Horizon Europe and Digital Europe, a human-centric and intersectional approach should be adopted in the field of research and innovation, with the aim to contribute to advancing accessibility of ICT, assistive technologies, all transport modes, built environment, and other products and services (e.g. healthcare). A Design for All approach and accessibility should be required as a precondition for funding (e.g. development of smart mobility solutions) to avoid creating new barriers for persons with disabilities. Meaningful engagement of persons with disabilities in projects that aim to develop disability-specific solutions (e.g. assistive technologies) and mainstream solutions which also affect persons with disabilities, should also be a funding requirement.
- An adequate budget should be allocated to cover accessibility and reasonable accommodation costs within all EU programmes.
- Through the Creative Europe/MEDIA programme, attention should be paid to accessibility of European audio-visual media and culture for persons with disabilities as a prerequisite to receive funding. This programme should also facilitate the equal participation of persons with disabilities in the media and culture sectors.

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 27 European Union member states, candidate countries and other countries in geographical Europe.

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