

# **Public consultation: Enhancing the strategy for the rights of persons with disabilities up to 2030**

My feedback (4000 characters)

When it comes to the rights of persons with disabilities the EU faces significant problems:

- The segregation of disabled people has increased. According to Eurofound, the number of disabled people confined to institutions has increased by 29% in the last decade.
- Disabled people are excluded from work. Between 2010 and the disability employment gap has increased from 18,6% to 24,5%.
- Disabled people experience significantly higher poverty rates and are much more likely to be homeless. According to Eurostat, in 2024 28,8% were at risk of poverty, compared to 17.9% of non disabled people. According to the OECD, in some member states a quarter of the homeless population report to have physical impairments and up to 60% to have a psychosocial impairment.

We call on the European Union to use its competences to the fullest to improve the situation because:

- The EU is a state party to the UN CRPD and obliged to implement it faithfully.
- The exclusion and discrimination against disabled people is causing immense economic costs to society. According to the OECD, some member states are spending up to 4,4% of GDP on long-term care with more than 80% going into nursing homes. Disability exclusion is producing €0.84–1.42 billion in annual GDP losses and €302–493 million in lost tax revenue EU-wide.

We as ENIL have prepared detailed recommendations to address the enormous problems we are facing. Our recommendations are linked to the Concluding Observations of the UN Committee on the Rights of Persons with Disabilities (CRPD-Committee) to the Combined Second and Third Periodic report of the European Union.

1. Improve implementation and monitoring of the UN CRPD

In its Concluding Observations the CRPD-Committee criticised the legal and institutional arrangements for the implementation of the UN CRPD.

We call on the EU to:

1. Ratify the Optional Protocol to the Convention.
2. Reform the current CRPD monitoring framework at the EU-level. We need a framework that is independent, well structured and adequately funded.
3. Issue guidance highlighting the crucial roles of disabled people's organisations in EU policy making and the need to provide financing of operational costs.

## 2. Use EU Funds to support Independent Living

In its Concluding Observations the CRPD-Committee criticised the fact that the EU is spending large amounts of resources on institutions which under UN CRPD is not allowed. Under the new MFF and the National and Regional Partnership Plans Regulation political steering of the spending of EU Funds will be enhanced which creates an opportunity to direct member states to redirect funding from services that segregate into Independent Living Services.

We call on the EU to:

1. Ensure that the Country Specific Recommendations and the European Semester contain clear instructions for member states to substantially revise their use of EU Funds.
2. Ensure there are milestones in place which set concrete targets for a reduction of spending on institutions or sheltered employment and an increase of spending for services such as personal assistance, personal budgets and supported employment.
3. A formal procedure needs to be installed which ensures that the Disability Platform and especially the Disabled Peoples Organisations who are members receive a co-production role in drafting disability related recommendations of the Country Specific Recommendation, the European Semester and milestones and targets.

## 3. Use state aid to improve labour market inclusion

EU State aid legislation is frequently used to support social objectives. For example the SGEI-Decision was reformed to support the Affordable Housing Plan.

We call on the EU to use its competences in this area to boost the labour market inclusion of disabled people:

1. Redirect subsidies from institutions and sheltered workshops and into personal assistance and supported employment.
2. Reform the General Block Exemption Regulation to remove 2(f) from Article 34, thereby reducing the subsidisation of sheltered employment.

## Current situation of persons with disabilities

1. Do you agree with the following statement: Overall, the situation for persons with disabilities has improved over the last 5 years.  
(Agree/Somewhat agree/Neither agree nor disagree/Somewhat disagree/Disagree/Don't know)
  - In the EU country you live in: *somewhat disagree, improvement at EU level has not consistently translated into national practice, regarding independent living, deinstitutionalisation and housing*  
<https://enil.eu/independent-living-services-must-become-a-priority-in-the-eu-disability-strategy-2026-2030/>
  - In the EU in general: *somewhat agree. There has been progress in policy frameworks, rights recognition and visibility, but this has been uneven and slow, with limited impact on the everyday lives of persons with disabilities.*
  - Worldwide: *somewhat disagree, the situation worldwide is challenging including recent crisis, for example covid-19*
2. In which of the following areas of life do persons with disabilities face most difficulties at EU level?  
(Select up to 5 answers. Your answers will not be ranked.)
  - Access to buildings and places – not accessible cities*

Access to transport

Access to technology, goods and services (including online services)

*Living independently - continued institutionalisation; lack of personal assistance*

*Inclusion in the community – segregation in housing*

Equality and non-discrimination

*Recognition of legal capacity – guardianship and exclusion from decision-making*

*Work and employment – employment gap, lack of reasonable accommodation, sheltered employment*

<https://enil.eu/advocacy-campaign-for-inclusive-employment-takes-shape/>

Education

*Standards of living and social protection – higher risk for poverty and homelessness*

Support for family members

Healthcare services

Recognition of rights in the EU

Recognition of rights outside the EU

Awareness among the public and authorities

Political participation

Sexual and reproductive health and rights

Crisis preparedness

Other (please specify):

### Impact of EU initiatives

Do you agree or disagree with the following statements?

3. EU initiatives have helped to improve the general situation of persons with disabilities in the last 5 years  
(Agree / Somewhat agree / Neither agree nor disagree / Somewhat disagree / Disagree / Don't know)
- In the EU country you live in: **Somewhat disagree**
  - In the EU in general: **Somewhat disagree. *Despite EU-level commitments and initiatives, progress has not translated into real change effectively, especially regarding deinstitutionalisation and access to community-based support services.***  
<https://enil.eu/independent-living-services-must-become-a-priority-in-the-eu-disability-strategy-2026-2030/>
  - Worldwide: **Somewhat disagree**
4. The EU has helped improve the situation for persons with disabilities in the last 5 years through the following activities.  
(Agree / Somewhat agree / Neither agree nor disagree / Somewhat disagree / Disagree / Don't know)
- Legislative activities: **Somewhat agree, *Ignoring concluding observations of CRPD-Committee, Council Conclusions fail to respond any of the demands.***
  - Policy action and promotion of reforms in EU countries: **somewhat agree, EU Council proceeds to direct calls for Member states, which is positive.**

- Sharing knowledge and best practices with EU countries, partners and stakeholders: *somewhat disagree. Across many Member States, IL pillars remain poorly supported: access to personal assistance is uneven, information on rights is limited, and suitable housing options are lacking*
- Raising EU citizens' awareness of disability issues: *somewhat disagree*
- EU funding: *somewhat disagree. EU funding has not been aligned with the UNCRPD and has continued to support institutional or segregated models of care like small-group homes instead of community-based services and personal assistance.*

<https://enil.eu/council-conclusions-on-independent-living-are-a-missed-opportunity/>

5. In which of the following areas has the situation for persons with disabilities improved in the last 5 years at EU level?  
(Select up to 5 answers. Your answers will not be ranked)

Access to buildings and places

Access to transport

Access to technology, goods and services (including online services)

Living independently

Inclusion in the community

Equality and non-discrimination

Recognition of legal capacity

Work and employment

Education

Standards of living and social protection

Support for family members

Healthcare services

Recognition of rights in the EU – *EU Disability card in process*

Recognition of rights outside the EU

Awareness among the public and authorities

Political participation – *increased political attention but needs to improve*

Sexual and reproductive health and rights

Crisis preparedness

Not applicable because no improvement has been made

Other (please specify):

<https://enil.eu/independent-living-services-must-become-a-priority-in-the-eu-disability-strategy-2026-2030> - *According to this article, there has been some improvement at EU level in recent years, particularly in terms of policy frameworks, recognition of disability rights and certain accessibility measures, however the progress is uneven and slow. These developments have not consistently translated to everyday life improvements for people with disabilities.*

6. In which of the following areas has the situation for persons with disabilities NOT improved or worsened in the last 5 years at EU level?  
(Select up to 5 answers. Your answers will not be ranked)

Access to buildings and places

Access to transport

Access to technology, goods and services (including online services)

Living independently - *no, because of continued funding to small-group homes*

Inclusion in the community – *no, segregation in housing, underdeveloped community-based alternatives*

Equality and non-discrimination

Recognition of legal capacity – *guardianship and many people excluded from decision making*

Work and employment - *no, uneven progress, sheltered employment*

Education

Standards of living and social protection - *no, poverty and housing crisis*

Support for family members

Healthcare services

Recognition of rights in the EU

Recognition of rights outside the EU

Awareness among the public and authorities

Political participation

Sexual and reproductive health and rights

Crisis preparedness

Not applicable because no improvement has been made at all

Other (please specify):

<https://enil.eu/for-the-right-to-legal-capacity> - *legal capacity*

## Impact of the Strategy for the Rights of Persons with Disabilities (2021–2030)

The Strategy for the Rights of Persons with Disabilities 2021-2030 sets out objectives and actions to improve the situation for persons with disabilities. To better achieve its objectives, the Strategy identifies the following eight areas of action.

1. **Accessibility:** ensuring that products, services and the built environment are more accessible to persons with disabilities.
2. **Enjoying EU rights:** moving and residing freely and participating in the democratic process.
3. **Decent quality of life and living independently:** developing independent living and improving community-based services; supporting employment and skills development; consolidating social protection systems.
4. **Equal access and non-discrimination:** fighting discrimination based on disability; improving access to justice, social protection and healthcare, inclusive education, goods and services including housing, culture, safety and protection.
5. **External action:** promoting the rights of people with disabilities outside the EU too.
6. **Efficiently delivering the Strategy:** ensuring UNCRPD compliance in policymaking, cooperation with EU countries, regional and local authorities, and supporting implementation through EU funding.
7. **Leading by example:** making disability-inclusive employment in the EU a reality and ensuring buildings and communications are accessible.
8. **Awareness, governance and measuring progress:** Strengthening the EU framework under the UNCRPD and ensuring sound monitoring of and reporting on disability rights at EU level.

Do you agree or disagree with the following statements?

7. Overall, the Strategy has helped improve the situation of persons with disabilities (Agree / Somewhat agree/ Neither agree nor disagree / Somewhat disagree / Disagree / Don't know)
  - In your country: **somewhat agree**
  - In the European Union: **somewhat agree**
  - In the World: **somewhat agree**

*The strategy has strengthened alignment with the UNCRPD, but many commitments have not translated into meaningful progress. Inconsistent and insufficient national support systems remain and why stronger, coordinated EU*

*action is urgently needed. Access to personal assistance is uneven, information on rights is limited, and suitable housing options are lacking, community-based support is usually underdeveloped or unavailable. The EU is still funding small-group homes and other forms of segregated living, which are not the right approach to deinstitutionalization and are not in line with the UNCRPD Article 19.*

8. In your opinion, which factors have mostly helped the Strategy to make progress since 2021?

(Select up to 5 answers. Your answers will not be ranked.)

- Political and legal impact of the UN Convention on the Rights of Persons with Disabilities (UNCRPD)
- EU legislative activities
- EU policy action (including promotion of reforms in the Member States)
- EU funding
- Public initiatives at national level
- Public initiatives at regional and local level
- Private initiatives
- Advocacy by interest groups and non-governmental organisations (NGOs)
- Business lobbying
- Economic context
- Public opinion/changes of mentality
- New scientific discoveries and/or technological change
- Awareness-raising activities

Not applicable because no progress was made

Other (please specify):

9. In your opinion, in which area(s) has the impact of EU action on disability been insufficient since 2021?

(Select up to 5 answers. Your answers will not be ranked.)

Accessibility

Moving and residing freely in the EU

Participating in the democratic process

Fighting discrimination based on disability

Improving access to justice

Social protection - disabled people face higher risk to poverty and exclusion

Health - *COVID-19 had disproportionate impact on persons with disabilities and highlighted systemic failures in inclusive services and independent living supports.* <https://enil.eu/covid-19/>

Employment

Education and training

Goods and services including housing - lack of accessible and affordable housing

<https://enil.eu/enil-demands-housing-and-support-first-approach-for-deinstitutionalisation>

Culture

Safety and protection

External action

EU initiatives that comply with the UN Convention on the Rights of Persons with Disabilities - *UNCRPD compliance is referenced, but not systematically enforced*

Cooperation with EU countries, regional and local authorities

Supporting implementation through EU funding – *continue to support small-group homes*

Leading by example

Raising awareness of disability rights

Measuring progress on disability rights at EU level

Not applicable

Other (please specify):

10. How familiar are you with these EU initiatives?

(Very familiar / Somewhat familiar / Not familiar at all).

- Strategy for the Rights of Persons with Disabilities 2021-2030: **Very familiar**
- European Disability Card and European Parking card for persons with disabilities: **Somewhat familiar**
- Disability Employment Package: **Somewhat familiar**
- Guidance on independent living and inclusion in the community: **Very familiar**
- Disability Platform: **Very familiar**
- European Commission’s Renewed Human Resources Strategy: **Somewhat familiar**
- AccessibleEU: **Very Familiar**
- European Accessibility Act: **Very familiar**
- Web Accessibility Directive: **Very familiar**
- European accessibility standards (in the built environment, Design-for-All approach, ICT products and services): **Somewhat familiar**
- European Day of Persons with Disabilities Conference and Access City Award: **Very familiar**
- European Directive on Equal Treatment in Employment: **Very familiar**
- European Passenger Rights Regulations: **Somewhat Familiar**

I selected the initiatives where ENIL is actively engaged in advocacy, policy work and monitoring as “very familiar”.

## Enhancing the Strategy for the Rights of Persons with Disabilities up to 2030

11. In your opinion, which areas of action should be prioritised for the Strategy to improve the situation of persons with disabilities in the EU?  
(Select up to 10 answers. Your answers will not be ranked.)

- Accessibility of buildings and places
- Accessibility of internet, communications and ICT
- Accessibility in tourism
- Accessibility of transport systems and infrastructure
- Universal design (products, environments, programmes and services) \*

(Universal design means designing products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. This does not exclude assistive devices for particular groups of persons with disabilities where this is needed.)

- Assistive technologies and research
- Sustainable urban and rural development and disability
- Access to goods and services
- Housing
- Work and employment
- Habilitation and rehabilitation

- Reasonable accommodation\* (Reasonable accommodation means necessary and appropriate modification and adjustments that do not impose a disproportionate or undue burden, where needed in a particular case, so that the rights of persons with disabilities are respected on an equal basis with persons without disabilities.)
- Education and training
- Independent living and inclusion in the community
- Moving and residing freely in the EU
- Health
- Mental health
- Sexual and reproductive health and rights
- Social protection and anti-poverty measures
- Crisis preparedness
- Safety and protection
- Right to liberty and security
- Equal recognition before the law and legal capacity
- Access to justice
- Participation in political and public life

- Statistics and data collection
- EU institutions leading by example
- Monitoring and enforcement of disability legislation
- Financing of the monitoring mechanism
- Funding of organisations of persons with disabilities
- Inclusive humanitarian action and international cooperation
- Awareness-raising and media
- Cultural life, recreation, leisure and sport
- Ageing and disability
- Youth
- Children with disabilities and their families
- Women and girls with disabilities
- Refugees and migrants with disabilities
- Ethnic minorities with disabilities
- Other (please specify):

*It is very difficult to choose only 10. I would include reasonable accommodation and accessibility of buildings and cities – particularly Brussels is a very inaccessible city, both connect to employment.*

12. In your opinion, of which issues is there more need to raise awareness?  
(Select up to 10 answers. Your answers will not be ranked.)

- Accessibility of buildings and places
- Accessibility of internet, communications and ICT
- Accessibility in tourism
- Accessibility of transport systems and infrastructure
- Universal design (products, environments, programmes and services) \*  
  
(Universal design means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. It does not exclude assistive devices for particular groups of persons with disabilities where this is needed.)
- Assistive technologies and research
- Sustainable urban and rural development and disability
- Access to goods and services
- Housing**

- Work and employment
- Habilitation and rehabilitation
- Reasonable accommodation\* (Reasonable accommodation means necessary and appropriate modification and adjustments that do not impose a disproportionate or undue burden, where needed in a particular case, so that the rights of persons with disabilities are respected on an equal basis with persons without disabilities)
- Education and training
- Independent living and inclusion in the community
- Moving and residing freely in the EU
- Health
  - Mental health
  - Sexual and reproductive health and rights
- Social protection and anti-poverty measures
- Crisis preparedness
- Safety and protection
- Right to liberty and security
- Equal recognition before the law and legal capacity
- Access to justice

- Participation in political and public life
- Statistics and data collection
- EU institutions leading by example
- Monitoring and enforcement of disability legislation
- Financing of the monitoring mechanism
- Funding of organisations of persons with disabilities
- Inclusive humanitarian action and international cooperation
- Awareness-raising and media
- Cultural life, recreation, leisure and sport
- Ageing and disability
- Youth
- Children with disabilities and their families
- Women and girls with disabilities
- Refugees and migrants with disabilities
- Ethnic minorities with disabilities

Other (please specify):

*Again, very difficult to choose only 10. But I'd like to emphasize that there is a particular need to raise awareness of sexual and reproductive health and rights and mental health from a disability rights perspective, as women and persons with disabilities remain largely excluded from these debates.*

13. The Strategy promotes an intersectional perspective, addressing specific barriers faced by persons with disabilities who are at the intersection of identities, or in a difficult socioeconomic or other vulnerable situation. In your opinion, which identities and/or vulnerable situations constitute persons with disabilities who face the most difficulties and require further action?  
(Select up to 5 answers. Your answers will not be ranked.)

Children

Older people

Women

Homeless people

Refugees

Migrants

Roma

Other ethnic minorities

LGBTIQ+

Racialised people

Other (please specify):

## Final comments

14. \*If relevant, you may provide comments other than those the previous questions cover

15. \*If relevant, you may provide a document further contributing to this public consultation on Enhancing the Strategy for the rights of persons with disabilities up to 2030.