



The voice of blind and partially sighted people in Europe

EBU Statement on the European Elections 2024

Stand for a Union more inclusive of visually impaired people

September 2023

Introduction

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 25 European Union member states, candidate countries and other countries in geographical Europe.

With this Statement, we **call on candidates and political parties from all countries** to pay attention, in the campaign for the European elections of 2024 and, if elected, during the following five years, to the expectations of blind and partially sighted persons in Europe, in line with the UN Convention of the Rights of Persons with Disabilities.

In complementarity with the [European Disability Forum's Manifesto](#), we here highlight our **ten key issues**, stressing the growing importance of including people with a visual impairment in the context of the Union's aging population.

Political participation

European elections should set a standard on **accessible voting**, i.e. accessibility of the vote itself (voting procedures), of electoral information (election campaign facilities and materials, political debates, political party programmes and websites) and of post-election procedures (e.g. complaint mechanisms), as well as **equality in the right to stand** as a candidate.

We welcomed the adoption by the European Parliament, in May 2022, of an own-initiative resolution for the **reform of the EU electoral law**, which, importantly, includes a new article requiring appropriate measures to guarantee the right for people with disabilities to vote independently and in secret, the free choice of assistance, and the accessibility of postal voting and political campaigns. We expect the new Assembly to continue to press the EU Council for the adoption of this resolution, with a view to bringing tangible progress in the European elections of 2029.

Equality

Over 15 years ago, a horizontal **non-discrimination** directive was proposed by the European Commission to protect EU citizens against discrimination on all grounds, be it disability, age, sexual orientation, or religious belief. Sadly, the directive, which has always been supported by the Parliament, remains blocked at the Council.

Through continued pushing for the adoption of the above proposal or, if necessary, through promoting an alternative proposal focused on discrimination on the basis of disability **beyond the area of employment**, we expect the new Assembly to provide greater protection to persons with disabilities against discrimination, including by contributing to strengthening the powers and means of equality bodies.

Free movement within the EU

The **EU Disability Card**, which provides facilitated access for people with disabilities to a variety of services, notably in the areas of recreation and leisure (museums and cultural sites) and transport, so far has only been a pilot project, and as such it is implemented on a voluntary basis, in only 8 EU countries, and without covering the same areas in all the participating countries.

The European Commission has presented a legislative proposal that aims to make the card what citizens with disabilities expect it to be: an EU-wide scheme of recognition of disability for **equal access to disability-related benefits and services** for people with disabilities exercising their right of free movement within the EU.

Should this legislative file remain pending, we expect the new Assembly to support a card that will ensure the mutual recognition of disability status across Member States, covering not only tourism, leisure, transport, culture and sport, but all specific services to persons with disabilities, including commercial services such as, for instance,

discounts on assistive devices. For the card to make a significant difference in guaranteeing **equal treatment in movement** for persons with disabilities, it should not only concern travelling to another EU country, but also facilitate the **transitional recognition of the disability status** when moving to another country to study or to work, while the disability is certified by the new country of residence—although this might require a separate legal instrument.

Passenger rights

To be truly included in society, visually impaired people need to be able to **move around and travel autonomously**, as freely as any other person in the EU.

We expect the new Assembly to support an **update of the EU passenger rights regulations** that will ensure this. Specifically:

- In **air transport**, it should no longer be possible to deny boarding to visually impaired travellers for ‘safety reasons’, nor to deny boarding with a properly trained guide dog, and any such denial should open a right to swift and fair compensation. Air carriers should also be obliged, as is the case in other transport modes, to provide a ticket free of charge if they impose an accompanying person.
- In **road transport**, the obligation to provide assistance should not be limited to cross-border services and certain domestic services above 250 km, thereby excluding many local and regional services.
- In **rail transport**, looking beyond the still recent revision of the legislation, the obligation to provide assistance to visually impaired travellers should eventually not be limited to larger stations, nor be subject to a condition of prior notification.

Accessibility of products and services

Gaps of the European Accessibility Act

While there has been significant progress in the area of accessibility recently with the European Accessibility Act, the provisions of which will have to be respected by June 2025, this is not a truly horizontal directive. With its limited scope, it remains mostly a digital act. We welcome the attention to digital accessibility because the Digital Transition, depending on whether accessibility of information technology is ensured, can either contribute to the inclusion of visually impaired people or, on the contrary, further exclude them—possibly even discriminate them, if one thinks for

example of the possibilities of artificial intelligence. We regret however that the Act does not address the need of blind and partially sighted people to be able to access information in the physical world, be it through Braille marking or other accessibility solutions. Moreover, the Act focuses on a few selected sectors, leaving out areas which are crucial to the autonomy of visually impaired people.

We expect the new Assembly to promote legislative initiatives to broaden the scope of the Act, to better reflect the daily life needs of blind and partially sighted people. The broadening of the scope includes:

- Information about the content and composition of **food products**—there is already legislation in place for the labelling of medicinal products, but not for informing visually impaired consumers about the very first type of product one needs to buy in everyday life.
- **Household appliances**—home is supposed to be where one feels more protected and able, and household appliances are every-day helpers. Yet, the appearance of non-accessible touch-pad directed devices is threatening this certainty, making visually impaired people more dependent on others in their own homes.

Looking beyond products and services and persons with disabilities as consumers, so far there is no EU legislation on the accessibility of **buildings**. The Built Environment legislation under the EU Green Deal for the renovation of buildings and infrastructure provides an opportunity to finally change this.

Books

We expect the new Assembly to take interest in the announced evaluation by the European Commission of the EU's legal framework for the implementation of the **Marrakesh Treaty**, evaluation which has started and is likely to be finalised in 2024. Concluded in the framework of the World Intellectual Property Organisation, the Marrakesh Treaty, rather than protect the interests of rights holders, allows authorised entities to produce **accessible-format books** and to share them across national borders in the EU and in the world. This is because only a small portion of all published books in the developed countries, and even less in developing countries, are ever produced in accessible formats - such as braille, large print and audio, and e-books – that visually impaired people and print disabled people need for equal reading enjoyment.

The European Accessibility Act does not undermine the importance of the Marrakesh Treaty, given that it only covers e-books, i.e., only one of the possible reading solutions that the print-disabled should be able to choose from—Braille, Daisy, audio etc.—depending on their needs and preferences.

We call on the European Parliament to support the view that a revised Marrakesh Treaty Directive should drop the possibility for Member States to opt to implement a **compensation right for rights-holders**, which undermines the aim of the Marrakesh Treaty and is unfair. Why would rights holders need to be compensated for failing to offer accessible-format books in sufficient numbers in the first place?

Films

Ideally, there should be no **EU funding** for products or services that are not accessible for people with disabilities. Pragmatically, in some areas, we argue that, at the very least, EU funding should come with progressively more demanding conditionalities for delivering on accessibility.

Looking in particular at the EU funding for the film industry under the **MEDIA strand of the Creative Europe programme**, the EU's funding instrument for cross-border film productions, we think the EU should deliver more on promoting inclusion of persons with disabilities, namely by using its financial leverage to emphasise the requirement that films be made **accessible films** for visually impaired people, as is observed at national level in some EU countries.

In the context of the mid-term review of the Creative Europe Programme Regulation for 2021-2027, we expect the new Assembly to press the European Commission to introduce progressively more demanding **audio-description and audio subtitling** conditionalities for MEDIA support, with benchmarking of progress and that, for the period 2021-2027, a target be set of at least 25% of films that receive MEDIA production or distribution funding have an audio description and audio subtitling in the languages of the production.

Web Accessibility

The 2016 EU Web Accessibility Directive does not apply to the **websites and mobile applications of EU institutions**. While the importance in volume and languages of the information that they publish justifies extra-

time to adapt, EU institutions should nevertheless make every effort to put in practice what EU law requires from Member States.

We expect the new Assembly to press the European Parliament as such to set the example for its own information and communications online, with **publicly available benchmarking of progress**, and to use its influence to promote the same from the other EU institutions.

Safe mobility

We also expect the new Assembly to:

- Address the insufficiencies of EU legislation concerning an acoustic vehicle alerting system (AVAS) electric and hybrid, i.e., **silent vehicles**, namely: adequate sound type and level, and speed up to which it is activated; and extended material scope, to cover also electric motorcycles or scooters.
- Be mindful of the need to take into account, early on, the needs of blind and partially sighted people in legal developments around connected and autonomous, i.e. **driverless vehicles**, both as vulnerable pedestrians and as users (particularly in public transport).
- Use its influence, including through structural funds, to promote best practices in ensuring road safety for visually impaired pedestrians in respect of the development of **new forms of urban mobility** (bicycles, scooters, segways etc.).

Employment

The European Disability Forum's 2022 Human Rights report, "Right to Work", released on 27 April 2023, points at the clear difference in employment rates of persons with disabilities and without disabilities – the "**disability employment gap**". The EU average is 24.4 percentage points (with wide differences between countries). Moreover, only 51.3% of active, working-age persons with disabilities in the EU are in paid employment, and this figure comes down at 47.4% for **young people with disabilities**; and when they are paid, people with disabilities still earn considerably less, even though they need more income to face the additional costs of living in a discriminatory and inaccessible society.

One of the reasons found for this situation in the report is something already described in the EU Disability Rights Strategy 2021-2030: the lack of **quality vocational education that is inclusive**, i.e., accessible

and offering reasonable accommodation and support to learners with disabilities.

We expect the new Assembly to incite Member States to ensure that mainstream vocational education and training programmes are inclusive and accessible for persons with disabilities to facilitate their transition to the open labour market, and to make the EU participate in that effort through its funding.

Social benefits

As pointed out in the recent European Social Policy Network study for the European Commission, there is currently no reliable and comparable data at EU level on the additional costs of living for people with disabilities. This is particularly necessary as a matter of addressing inequality between those on the same income with and without a disability (“**horizontal inequality**”).

We expect the new Assembly to incite the European Commission and Member States to gather such **data and evidence**, which should be disaggregated **by type of disability**.

We also expect the new Assembly to promote the exchange of best practices, so that, in their social protection schemes, Member States factor in the additional costs of living associated with disability through needs-based mechanisms which are not means-tested, nor based on the income of others within their household (“**individualisation of rights**”) and persons with disabilities can maintain disability-related support when accessing paid-work.

External Action of the EU

The **EU Instrument for Pre-Accession Assistance** and the **Eastern Partnership** should address inclusion and disability-related concerns, and the implementation of the UN Convention on the Rights of Persons with Disabilities, to promote best practices in the **wider Europe**.

We expect the new Assembly to recommend this. We also expect it to promote the development and funding of support services for **visually impaired asylum-seekers and refugees** with disabilities in the EU and, in the wake of the **war in Ukraine**, support to visually impaired Ukrainians inside and outside of their country.

The EU will also have a major role to play in the negotiations, **at the UN**, of the successor framework of the 2030 Agenda for Sustainable

Development. These negotiations can be expected to kick-off in 2027/2028. We expect the new Assembly to push for the inclusion of persons with disabilities and their rights as part of the post 2030 global agenda.

Conclusion

The European Parliament has been a strong ally for the rights of persons with disabilities in Europe for many decades. We count on the new Assembly to follow in these footsteps. The five years ahead will offer plenty of opportunities to the Parliament to act for a more inclusive Union. One of the key moments to do so is the 7-year **budgetary framework (2028-2034)**. As co-legislator, the Parliament will have the power to ensure that under the new funding instruments, all EU spending is really dedicated to promoting full inclusion of persons with disabilities. Specifically, we would like the EU to invest resources in increasing the knowledge and availability of Braille.

Also, we ask the political groups at the European Parliament to support the re-establishment of the **Disability Intergroup**. This informal cross-country and cross-party grouping of Members of the European Parliament has been a key ally in advocating for and advancing the rights of persons with disabilities in Europe, and in enabling their participation in decisions that concern them. We encourage future MEPs from all countries and political groups who are interested in promoting disability policy in their work at the European Parliament as well as at the national level, to eventually join this intergroup.

In general, as a horizontal matter, we urge policymakers to uphold **Braille literacy**, bearing in mind that, contrary to what is sometimes heard, the development of assistive information technologies that give visual impaired people quick access to information through auditory perception, does not undermine its importance. As explained in our [Statement](#) of 2023, Braille is a universal, effective and for many blind people natural accessibility solution and—importantly—a factor of more qualitative education and personal development.

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