



**EFHOH Alternative Report to the CRPD  
Committee in the framework of the EU  
Reporting before the CRPD Committee - 2025**

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## ABOUT EFHOH

The [European Federation of Hard of Hearing People](#) (EFHOH) established in 1993 and registered in the Netherlands, is a non-profit (ENGO) Federation of national organizations representing hard of hearing and late-deafened individuals across Europe. All our board members have lived the experience of hearing loss and deafness.

EFHOH advocates awareness and practical actions to **eliminate barriers to access affordable hearing care** and **rehabilitation** and create an accessible society through public services and assistive technologies. Its main objective is to **protect and promote the rights of individuals with hearing loss in Europe**, facilitating legislative and social protections through collaboration with members and stakeholders.

Our recent joint report [Getting Our Numbers Right](#) estimates that **59 million people living in the EU** experience hearing loss, with a significant proportion requiring hearing care interventions not limited to hearing aids or cochlear implants. Unfortunately, hard of hearing community-specific needs for access to communication and information including access to speech-to-text or hearing loops are often missing in policies.

## EXECUTIVE SUMMARY

As a State Party to the UN Convention on the Rights of Persons with Disabilities (CRPD), the EU is reviewed by the CRPD Committee under Articles 35 to 40. The Alternative Report by the European Federation of Hard of Hearing People (EFHOH) assesses the European Union's implementation of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), focusing on the rights and accessibility needs of people with hearing loss. EFHOH recognizes the European Union's efforts in implementing the UNCRPD Articles to support the rights of people with disabilities. However, significant gaps remain in EU legislation, policies, and initiatives, preventing full accessibility and equal participation for hard of hearing individuals. This report highlights such shortcomings and provides key recommendations to strengthen hearing care access, life independence, political participation, and accessibility standards, ensuring the full and meaningful implementation of the UNCRPD for the hard of hearing community. Few key recommendations include:

- **Equality and Non-Discrimination (Article 5):** Hearing loss remains unequally recognized across the European Union. The EU should monitor Member States to ensure equal access to hearing care and rehabilitation services as part of national disability policies, in line with the [European Strategy for the rights of persons with disabilities 2021-2030](#).
- **Women with Disabilities and Freedom from Exploitation, Violence, and Abuse (Articles 6 & 16):** Ensure accessible gender-based violence services by mandating real-time captioning and assistive technologies in emergency services and legal systems.
- **Accessibility (Article 9):** The EU should monitor Member States' transposition of the Audiovisual Media Services Directive (AVMSD) to ensure 100% subtitling and accessibility standards for hard of hearing individuals.

- **Health and Habilitation and Rehabilitation (Articles 25 & 26):** The EU should establish EU-wide guidelines for hearing care reimbursement and ensure universal access to hearing aids and rehabilitation.
- **Work and Employment (Article 27):** Monitor Member States' policies on reasonable accommodation at work for hard of hearing people under the [Employment Equality Directive](#) and implementation of newly published [Guidelines on Reasonable Accommodations at Work](#).
- **Participation in Political and Public Life (Article 29):** The AVMSD must apply to EU institutions' in-person events, recordings and live-streaming to ensure full accessibility in all political and public communications.
- **Participation in Cultural Life, Recreation, Leisure, and Sport (Article 30):** Strengthen the AVMSD by requiring 100% subtitling and quality standards for both live and on-demand audiovisual media across all EU Member States.
- **Statistics and Data Collection (Article 31):** The EU should require Eurostat and EU data agencies to include hearing loss in all relevant surveys and ensure disaggregated data to support targeted policies on healthcare, employment, and accessibility.

This report calls for stronger EU action to support the protection of hard of hearing community including accessibility standards, improved healthcare accessibility, hearing care policies, strengthened workplace protections, and enhanced data collection. The EU must take concrete steps to align its commitments under the UNCRPD with policies that ensure the full inclusion and equal rights of people with hearing loss across all areas of life.

## ARTICLE 5: EQUALITY AND NON-DISCRIMINATION

All EU Member States' governments have an obligation under Article 5 of the UNCRPD to ensure that all persons with disabilities, including those with hearing loss, can live full and independent lives. Hearing aids play a fundamental role in communication, education, employment, and social inclusion, significantly improving well-being. However, disparities in access to hearing aids and rehabilitation persist across the EU, undermining the commitments outlined in the **European Strategy for the rights of persons with disabilities 2021-2030**. Without consistent implementation and oversight, hard of hearing individuals remain at risk of exclusion experiencing disability discrimination in many aspects of life.

## ARTICLE 6: WOMEN WITH DISABILITIES AND ARTICLE 16: FREEDOM FROM EXPLOITATION, VIOLENCE AND ABUSE

Despite the European Union's Gender Equality Strategy acknowledging disabilities, there has been no concrete action to address the specific needs of hard of hearing women. The absence of assistive technology in healthcare services, such as assistive listening systems and information via speech-to-text, amplifies the challenges faced by women with hearing loss. Many hard of hearing women report experiencing inaccessible healthcare systems while balancing caregiving and professional responsibilities. These systemic gaps highlight a gendered accessibility gap, where the needs of women with hearing loss remain unmet.

EFHOH's report on [Hard of Hearing Women in Europe](#) highlights the significant disparity in safety and well-being. Based on a survey conducted by EFHOH in 2024, it revealed significant challenges faced by hard of hearing women, including limited access to healthcare, employment discrimination, educational barriers, and heightened exposure to violence. Key issues such as communication barriers, lack of accessible support, and insufficient data on their specific needs were identified, especially in emergency situations. The survey also highlighted the low visibility of hard of hearing women in social and political life, with barriers hindering their full participation in civic engagement and legal processes.

The intersection of GBV and disability discrimination is particularly evident in places like at home, workplaces and public services. Women with hearing loss often face communication barriers that intensify their risk of GBV. The lack of accessible reporting systems prevents timely intervention, while stigma and societal attitudes perpetuate marginalization. For example, controlling behaviors from partners or neglect in caregiving roles are frequently observed, with these acts often justified by societal perceptions of disability.

### Recommendations:

1. Mandate EU-wide disaggregated data collection on GBV against women with hearing loss, ensuring compliance with Article 31 CRPD.
2. Require emergency services and courts to provide real-time captioning and assistive technologies as standard practices.

3. Include specific measures for women with disabilities, particularly those with hearing loss, in the implementation of the [Istanbul Convention](#) and the European Strategy for the rights of persons with disabilities 2021-2030.

## ARTICLE 9: ACCESSIBILITY

Accessibility remains a significant issue for people with hearing loss in Europe, particularly in healthcare, public services, and media. EFHOH's **2024 report on [Healthcare Accessibility for Hard of Hearing people](#)** found that only 13% of respondents were informed about available assistive technologies during medical visits, and 57% reported that healthcare facilities lacked hearing loops. This indicates a lack of accessible communication tools for essential services, leaving individuals with hearing loss at a disadvantage in accessing healthcare and support.

Accessibility standards for TV and streaming platforms vary significantly, with few countries making progress on the availability of subtitling, while many others exclude hard of hearing people from accessing cultural and informational content due to lack of communication support.

Consultations and emergency communication systems also fail to meet the needs of people with hearing loss. Many consultations lack real-time captioning or assistive listening systems, effectively excluding people with hearing loss from participating in decision-making processes or accessing critical information during emergencies.

Key gaps include:

- **European Accessibility Act (EAA):** The EEA covers accessibility for goods and services but does not mandate specific tools for hearing loss, such as real-time captioning and hearing loops in public spaces.
- **Audiovisual Media Services Directive (AVMSD):** It requires accessibility for audiovisual media but fails to mandate 100% subtitling or enforce standards for live broadcasts. [EFHOH's findings](#) from a survey among its member organizations revealed that many Member States did not consult the hard of hearing community or provide them with communication support during consultation in the AVMSD transposition process, resulting in accessibility measures that do not reflect the needs of people with hearing loss.

### Recommendations:

1. Review the EAA to mandate hearing-specific accessibility in all public spaces and services.
2. Ensure direct consultation with the hard of hearing community, alongside communication supports in the consultation process, for legislative transposition such as the AVMSD.
3. Enforce harmonized accessibility standards meeting hard of hearing people's needs across Member States and strengthen EU-level monitoring to ensure effective transposition into national legislation.

## ARTICLE 25: HEALTH & ARTICLE 26: HABILITATION AND REHABILITATION

EFHOH's **2024 report on [Healthcare Accessibility for Hard of Hearing people](#)** reveals significant gaps for people with hearing loss in accessing healthcare. Communication barriers prevent equal access, with 84% of respondents calling for better communication training for healthcare providers and 66% emphasizing the need for assistive technology awareness. The COVID-19 pandemic worsened these barriers, with mask-wearing and reliance on phone consultations leaving many excluded from essential services, while the lack of real-time captioning and subtitling in TV broadcasts further prevented hard of hearing individuals from critical public health information.

EFHOH has been monitoring access to hearing care and essential intervention for hard of hearing citizens. Our **2022 report on [State of Hearing Aids Provision in Europe](#)** highlights disparities, with some countries offering comprehensive coverage, while others impose restrictive criteria with low or no reimbursement and long waiting times. Varied access to hearing aids and rehabilitation services limits access to essential hearing devices and follow-up care, leaving many people with hearing loss unsupported, limiting the opportunities and independence.

### Recommendations:

1. Monitor EU Member States' implementation of the [European Pillar of Social Rights](#) regarding hearing care interventions, including hearing aid and cochlear implants provision and rehabilitation, into national disability policies in line with the European Strategy for the rights of persons with disabilities 2021-2030 and UNCRPD obligations.
2. Adopt [ISO 21388 \(Hearing Aid Fitting Management - HAFM\)](#) as the threshold for quality hearing services to standardize rehabilitation and ensure effective support.

## ARTICLE 27: WORK AND EMPLOYMENT

People with hearing loss face systemic barriers to employment, primarily due to the lack of timely access to hearing aids and insufficient assistive technologies. These gaps result in hard of hearing individuals being either denied opportunities outright or inadequately supported in the workplace. Data from the EFHOH report [Experiences of late deafened people in Europe](#) (2018) indicates that 66% of deafened individuals were employed post-hearing loss, but only 45% could retain their roles due to inadequate accommodations.

Despite the [Guidelines on Reasonable Accommodations at Work](#) recently promoted by the EU, employment cannot be truly accessible without the necessary communication support for hard of hearing people.

Without workplace accommodations, hard of hearing individuals must rely on their own communication support, which is often impractical due to limited hearing aid reimbursement in many Member States. According to the EFHOH [State of Hearing Aids Provision in Europe report](#) (2022), many adults, especially those over 26, receive minimal or no support, with eight countries offering low reimbursement and two providing none. Wait times vary, ranging from immediate to several months, and most countries require hearing aid upgrades every 5 years, further limiting access and hindering employment opportunities.

[Case C-795/19 Tartu Vangla \(ET\)](#), where a hard of hearing prison officer in Estonia was dismissed due to national regulations setting minimum hearing thresholds, highlights the broader issue that EU

enforcement mechanisms and monitoring of such laws remain weak, allowing discriminatory practices to persist across Member States.

**Recommendations:**

1. Monitor Member States' policies on reasonable accommodation at work for hard of hearing people under the Employment Equality Directive and implementation of newly published Guidelines on Reasonable Accommodations at Work.
2. Ensure that the [European Disability Card Directive](#) recognizes hearing loss as a disability in line with UNCRPD, guarantees equal access across Member States and aligns eligibility criteria to support freedom of movement.

## ARTICLE 29: PARTICIPATION IN POLITICAL AND PUBLIC LIFE

EFHOH welcomes the EU Commission and EU Parliament to strive for accessibility of the plenary events aimed at persons with disabilities, ensuring the availability of captioning (speech-to-text) and personal assistive technology. However, side events and meetings where hard of hearing people are present are often not accessible due to the lack of captioning or hearing loops, often due to a lack of planning for access needs.

Our monitoring observes that EU citizens with hearing loss continue to face barriers to full participation in political and public life due to the lack of real-time captioning and subtitling **in** live-streamed sessions, recordings and in-person events of the European Parliament and the European Commission. Without these essential accessibility measures, hard of hearing individuals are excluded from engaging in EU policymaking and decision-making processes.

**Recommendations:**

1. EU institutions must offer assistive listening devices to all visitors with hearing loss as part of building accessibility as recommended in European Standard [Accessibility and usability of the built environment - Functional requirements](#). EN 17210:2021.
2. Speech-to-text and assistive listening devices (ALDs) should be part of integral planning of meetings and events, including side events.
3. The AVMSD must apply to EU institutions to ensure their communications are fully accessible for hard of hearing people, by providing real-time captioning and subtitling for all live-streamed sessions, recordings and events.

## ARTICLE 30: PARTICIPATION IN CULTURAL LIFE, RECREATION, LEISURE, AND SPORT

People with hearing loss continue to face significant barriers to fully participating in cultural and recreational activities. Subtitling in theaters, cinemas, and sports venues remains inconsistent, with some Member States providing robust accessibility measures and others lagging far behind. EFHOH's **2011 and 2015 Subtitling Reports**, as well as the [AVMSD Implementation in Europe](#) report, highlight the gaps in the application of subtitling and assistive technologies across the EU. Under the AVMSD, streaming platforms are required to provide accessible content. However, enforcement of these requirements remains weak, with significant variations in the quality and availability of subtitles.

**Recommendations:**

1. Strengthen the AVMSD by requiring 100% subtitling and quality standards for both live and on-demand audiovisual media across all EU Member States.
2. Monitor the installation of hearing loops or other assistive listening systems and captioning systems in all cultural and recreational facilities under the EAA.

## ARTICLE 31: STATISTICS AND DATA COLLECTION

There is a significant lack of comprehensive data on people with hearing loss, particularly in areas like healthcare access, employment, and social participation. This gap undermines the development of effective policies and interventions. European Strategy for the rights of persons with disabilities 2021-2030 calls for improved data collection but does not fully address the specific needs of people with hearing loss.

### **Recommendations:**

1. Require Eurostat and other EU data agencies to include hearing loss-specific metrics in all relevant surveys.
2. Ensure data is disaggregated by type of disability to accurately reflect the needs of people with hearing loss and inform targeted policies.