

## **EFHOH comments on Enhancing the strategy for the rights of persons with disabilities up to 2030**

EFHOH welcomes the European Commission's commitment to strengthening the EU Strategy for the Rights of Persons with Disabilities 2021–2030. EFHOH notes many achievements of the first part of the Strategy, such as the EU Disability Card and EAA, and the establishment of the EU Disability Platform. However, there are still gaps in the realisation of full inclusion of people who are Hard of Hearing. The second half of the Strategy must introduce new, targeted initiatives that address persisting gaps identified by disability organisations and by the UN Committee on the Rights of Persons with Disabilities and translate existing commitments into measures with concrete and measurable impact.

This is particularly urgent for people with hearing loss. Hearing loss is one of the most prevalent disabilities in Europe, with an estimated 59 million people experiencing hearing loss in Europe, yet it remains structurally under-recognised in EU disability policy and legislation. As highlighted by the World Health Organization, notably in its [World Report on Hearing \(2021\)](#), hearing loss is a growing public health matter linked to ageing, environmental factors, and insufficient early intervention. Population ageing and rising retirement ages across the EU mean that more people are expected to remain in the workforce for longer. As hearing loss increases significantly with age, this trend will result in a growing number of workers with hearing loss, reinforcing the need for stronger investment in reasonable accommodation and healthy sound environments.

To address this background, EFHOH supports the development of a dedicated **EU Hearing Loss Strategy**, complementary to the Disability Rights Strategy and firmly grounded in the EU's obligations under the UN Convention on the Rights of Persons with Disabilities. Such a strategy would provide coherence and visibility, ensuring that hearing loss is addressed systematically across employment, accessibility, health, digitalisation, and freedom of movement policies. It should be anchored in a rights-based approach, recognising hearing loss as a disability in its own right and explicitly safeguarding the right of hard of hearing people to communicate in their chosen spoken languages, alongside other forms of communication and supports. Within this framework, the second half of the Disability Rights Strategy should prioritise closing remaining gaps in the legislative and policy landscape.

Persistent barriers remain in the area of **employment and access to reasonable accommodation**. According to [Eurostat](#), employment rates for people with hearing loss have remained at around 40–44% over recent years, significantly below both the employment rate for persons without disabilities and the EU average for persons with disabilities. Despite EU-level initiatives, employment exclusion of people with hearing loss remains high, and progress has not kept pace with overall employment targets. [Evidence from EFHOH's research](#) shows that implementation of reasonable accommodation remains uneven and often conditional in practice, frequently dependent on disability certification, administrative complexity, and individual self-advocacy. This limits equal participation in the labour market and continues to restrict cross-border mobility for work. The Commission should therefore consider a Disability Employment and Skills Guarantee, supported by EU funds, to facilitate access to employment, training, and further education for persons with hearing loss. Minimum standards on reasonable accommodation, the availability and affordability of assistive technologies, and flexible workplace arrangements, such as remote and hybrid working models, which have already demonstrated their potential to increase employment participation of persons with disabilities, would be key components.

**Affordability and availability of assistive technologies**, including hearing aids, remain a significant barrier. [EFHOH research on reimbursement systems](#) highlights wide disparities across Member States, including partial or low reimbursement levels that do not reflect the real cost of modern hearing aids, strict eligibility criteria, particularly for adults, and limited coverage for maintenance, upgrades, rehabilitation, and lifelong hearing care support. Feedback from EFHOH members also indicates regressive developments in some national systems, where reimbursement conditions have been rolled back rather than improved, further undermining inclusion, employment, and independent living.

**These challenges are closely linked to** freedom of movement. Divergent national approaches to disability recognition continue to undermine equal access to rights and support for people with hearing loss moving across borders for work, study, or long-term residence. In some Member States, hearing loss, even at disabling levels, is not consistently recognised as a disability, threatening access to accommodation and inclusion in the European Single Market. While the European Disability Card represents a positive development, its current scope and implementation do not yet fully address long-term or employment-related mobility. Greater EU action is therefore needed to move towards a common European ground on disability recognition, beyond mere conversion mechanisms, to ensure effective portability of rights.

**Access to information and communication** remains another area where limitations in scope, uneven implementation, and weak enforceability continue to affect hard of hearing people. While the European Accessibility Act represents a significant step forward, its provisions allow Member States to delay full accessibility to emergency services until 2027, prolonging gaps in safe and equal access for hard of hearing people. As a result, many essential services continue to rely predominantly on telephone (voice)-only contact, and awareness of hearing accessibility obligations remains uneven. Emergency communication systems, including 112 services, continue to pose significant risks where accessible alternatives are not reliably available on a 24-hour basis or interoperable across borders.

In parallel, **accessibility of audiovisual services** remains inconsistent across Member States. The lack of European standards for the accessibility provisions of the Audiovisual Media Services Directive has led to divergent national practices and limited attention to the quality of access services. As the Directive undergoes revision in 2026, the development of European standards for media accessibility is essential to ensure comprehensive subtitling coverage and enforceable quality requirements, including readability, accuracy, synchronisation, and usability across any type of live, on-demand, and online content. EU institutions and publicly funded media should continue to lead by example in accessible communication.

Across all areas of the Strategy, **meaningful participation of organisations representing hard of hearing people** remains essential. In line with CRPD Article 4(3), consultation should be systematic and embedded throughout EU policy development, implementation, and monitoring, and Member States should be encouraged to do the same at the national level.

In conclusion, the second half of the EU Disability Rights Strategy should build on progress made to date while introducing new and targeted actions to address persisting gaps. Without such action, millions of people with hearing loss will continue to face barriers to employment, mobility, access to information, and full participation in society. By strengthening existing instruments, improving implementation and monitoring, and only developing a coherent EU approach to hearing loss, the European Commission can ensure that the Strategy delivers tangible progress towards equality and inclusion of hard of hearing people.