

Enhanced EU Disability Strategy: EFHOH Calls for Stronger Action on Hearing Loss

On 6 May 2026, the European Commission adopted the Communication [“Enhancing the Strategy for the Rights of Persons with Disabilities up to 2030”](#), building on the EU Disability Strategy 2021–2030 and on key achievements of its first phase, including the European Disability Card, the European Accessibility Act (EAA) and the establishment of the EU Disability Platform.

EFHOH welcomes the stronger focus on assistive technologies, employment, independent living, healthcare and emergency preparedness, having actively [contributed to the consultation process](#). The new flagship initiative on assistive technologies is particularly welcome, reflecting EFHOH’s [long-standing advocacy](#) for equitable access to hearing aids, cochlear implants and assistive listening devices. However, hearing access remains insufficiently addressed across the Strategy’s actions, despite [more than 59 million people in Europe self-reporting hearing loss](#).

EFHOH therefore calls for hearing loss to be addressed throughout the Strategy and, in line with the [Brussels Declaration](#), for the development of a dedicated European Strategy on Hearing Loss.

Recognising the right to hearing access

The Commission recognises accessibility as an *“enabler of rights, autonomy and equality”* and confirms the continued implementation of key EU legislation, including the [European Accessibility Act](#), the [Web Accessibility Directive](#), the [Audiovisual Media Services Directive](#) and the [Digital Services Act](#). For EFHOH, this commitment must translate into explicit recognition of hearing access as a core dimension of accessibility.

Universal access to information and communication is an essential condition for equal participation in society. For hard of hearing people, this requires quality real-time captioning, written information and assistive listening systems to be systematically available across public services, workplaces, healthcare settings, education, audiovisual media and digital platforms.

The Strategy should also identify public procurement as a means of delivering these commitments, encouraging the inclusion of hearing-accessibility requirements in publicly procured digital services, transport infrastructure, healthcare equipment and public events. EU institutions should lead by example, including by providing real-time captioning and functioning hearing loops or other assistive listening systems at their public events. EFHOH’s [2025 report on EAA implementation](#) identifies persistent barriers, including telephone-only services and insufficient hearing-accessibility measures, highlighting the need for clearer implementation guidance, stronger monitoring and enforcement.

The enhanced Strategy missed the opportunity to guide ongoing EU legislative processes towards stronger hearing accessibility, particularly the proposed Digital Networks Act and the 2026 review of the Audiovisual Media Services Directive.

The [joint EUD-EFHOH 2026 report Mapping Relay Services in Europe](#) highlights significant gaps in the provision of accessible telecommunications, which the proposed [Digital Networks Act](#) fails to adequately address. The Act should establish binding requirements for all Member States to ensure the provision of Text Relay Services that are available 24/7, interoperable and accessible across borders. The [AVMSD](#) review should lead to binding, measurable subtitling obligations for television, on-demand and online audiovisual services within its scope, including quantitative coverage targets and quality standards for accuracy, synchronisation and readability.

Assistive technologies

The flagship initiative "*Assistive technologies and AI: from lab to market*", together with the planned study on accessibility, availability and affordability, represents an important opportunity to address inequalities in hearing care across Europe.

For EFHOH, this initiative must support a universal, equitable and preventive model of hearing care, backed by adequate public funding and procurement systems to guarantee equal access to hearing aids, cochlear implants, assistive listening devices and related services, regardless of age, income and geographical location.

EFHOH's European monitoring reports on hearing aid provision and reimbursement in [2018](#) and [2022](#), followed by its [2026 assessment](#) covering hearing aids, cochlear implants and assistive listening devices, document persistent disparities in eligibility criteria, reimbursement and affordability. The Commission's focus on these barriers must translate into concrete, stronger EU action to ensure equitable access to hearing care.

The initiative should also promote interoperable assistive listening systems in public spaces, including Auracast™, while ensuring that emerging technologies complement rather than prematurely replace established hearing loops and FM systems.

Employment and reasonable accommodation

EFHOH welcomes the continuation of the [Disability Employment Package](#) and the planned further work on reasonable accommodation and the school-to-work transition. However, the omission of the [EU Disability Employment and Skills Guarantee](#), supported by more than 125 organisations, should be reconsidered. Effective reasonable accommodation also requires adequate and sustained funding.

EFHOH contributes to this work through its [Hearing Loss Inclusive Employment Toolkit](#), providing practical guidance on accessible workplaces. The forthcoming [Quality Jobs Act](#) should recognise hearing accessibility and reasonable accommodation as essential elements of quality employment.



The Strategy also missed an opportunity to address freedom of movement in education and employment. Differences between Member States in recognising disability status, eligibility and support entitlements should not result in hard of hearing students, trainees and workers losing access to reasonable accommodation and hearing care when moving abroad to study or work.

Independent living, healthcare and emergency preparedness

The EU Alliance for Independent Living, planned healthcare-access guidelines and the flagship initiative "*Prepared for anything, prepared for everyone*" offer important opportunities to strengthen access to essential services.

The Strategy should recognise hearing loss as a major public health priority, supporting prevention, timely assessment, hearing care and rehabilitation across the life course, including healthy ageing. It should also address communication barriers in healthcare, police services, shelters and victim-support services, taking account of intersecting inequalities related to age, gender, disability and income. EFHOH's [Accessible Healthcare Toolkit](#) provides practical guidance for healthcare professionals and providers on making healthcare services more accessible for people with hearing loss.

Independent living also means being able to make and receive a telephone call independently. The [joint EUD-EFHOH 2026 report Mapping Relay Services in Europe](#) found that only 12 of the 30 countries mapped have operating Text Relay Services, with just over half providing 24/7 access to ordinary and emergency calls. Emergency preparedness must therefore include 24/7 access to emergency communications through text relay services, alongside visual and text-based warnings and written evacuation information in public spaces.

Through its participation in the [EUFunds4IL Coalition](#), EFHOH also calls for the next EU budget to support independent living and community-based services in line with the UN CRPD.

From commitments to implementation

EFHOH welcomes the Strategy's emphasis on implementation, monitoring and participation of organisations of persons with disabilities. Its success must be measured through tangible improvements, enforceable accessibility standards and better data on hearing loss and hearing access, with meaningful involvement of hard of hearing people and their representative organisations.