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OPD Report on Accessibility Gaps in the European Union: Ensuring Compliance with the Convention on the Rights of Persons with Disabilities in Digital, Transportation, and Societal Infrastructure

Submitted by AccessibilityAtlas
an organization of young persons advancing accessibility throughout the world

with support from the Centre for Voters Initiative & Action
a non-governmental organization supporting initiatives for the betterment of tomorrow

for the

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Introduction

AccessibilityAtlas presents this report to the United Nations Committee on the Rights of Persons with Disabilities ahead of the 32nd session for the review of the European Union. AccessibilityAtlas is a global non profit organization based in the United States, committed to creating a world where people of all abilities can fully participate in their communities. AccessibilityAtlas collaborates with civil society, international mechanisms, institutions of higher education, and local governments to catalyze change around the thematic issues of accessibility and inclusivity for persons with disabilities worldwide. We actively engage with the United Nations human rights mechanisms in Geneva and beyond, to address accessibility gaps and advocate for systemic solutions.

Our reporting process involves comprehensive research on nation-states under review by the CRPD Committee, dialogue with civil society and individuals with disabilities in those countries, and collaborative drafting of reports to highlight successes, challenges and gaps in accessibility.

This report is submitted ahead of the European Union's review under article 9 of the Convention on the Rights of Persons with Disabilities, which emphasizes international cooperation to advance the rights of persons with disabilities.
This petition is centered on three main issues: (1) inaccessible digital ecosystems; (2) policies and regulations for inclusive transportation; and (3) transportation and (4) societal infrastructure.

Inaccessible Digital Ecosystems

Insufficient Enforcement of Digital Accessibility Laws

Insufficient enforcement of digital accessibility laws in the European Union ('EU') remains a significant challenge, hindering the full realization of rights for persons with disabilities as outlined in Article 9 of the United Nations Convention on the Rights of Persons with Disabilities ('CRPD'). Despite the existence of the European Accessibility Act ('EAA') and other regulations, enforcement across member states is inconsistent, leading to widespread non-compliance. This digital divide hampers individual autonomy and limits economic participation and social inclusion, contradicting the principles outlined in Article 9 of the CRPD. As of 2025, only 63% of public sector websites in the EU fully comply with accessibility standards, leaving a substantial gap in digital inclusion. The European Disability Forum reports that 80 million Europeans with disabilities continue to face barriers to accessing digital services, with particular challenges in areas such as e-commerce, banking, and public administration portals.

This study finds that the lack of enforcement of digital accessibility laws in the EU is still a major problem, preventing the full implementation of rights for persons with disabilities as outlined in Article 9 of the CRPD. Despite the presence of the EAA and other laws, the implementation across the member states is a significant issue which amplifies the non-observance of these laws. This sort of digital divide not only prevents personal independence but also impacts economic orientation and social integration, contrary to the stipulations of Article 9 of the CRPD. In the EU, 63% of public sector websites will meet accessibility standards by 2025, meaning that there will still be a significant digital gap. According to the European Disability Forum, 80 million Europeans with disabilities still experience multiple problems when accessing digital services, especially in e-commerce, banking, and public administration portals.

The current state of enforcement of digital accessibility shows evident inequality across EU member nations. It was noted that though countries such as Sweden and the Netherlands boasted over 80% web accessibility compliance, others such as Romania and Bulgaria have less than 40% compliance. This inconsistency is counterproductive to the EU's promise of establishing a borderless digital marketplace in the EU member states. Example: According to the survey

conducted by the EU Agency for Fundamental Rights in 2024, 42% of persons with disabilities in the EU have problems with access to basic online services, while only 8% of persons without disabilities face the same problem. Moreover, persons with disabilities in the EU have an employment rate of 50.8%, far below the 75% in persons without disabilities, mainly due to inaccessible digital workplaces and online job applications.

Another issue is the absence of a coherent supervisory body, stifling implementation of equality measures for access across member countries. Many organizations, especially small/medium enterprises ('SMEs'), face challenges in the technical and financial integration of accessibility features. Technological development is changing at a very fast rate, leaving accessibility initiatives far behind, compromising the situation of persons with disabilities. The lack of harmonized penalties for non-compliance with the legislation across the EU reduces the punitive measures of existing legislation. A survey conducted by the European Accessibility Monitoring Centre in 2024 showed that 37% of SMEs were completely compliant with the digital accessibility regulation, as opposed to 72% of large organizations. The study revealed that 68% of SME owners claimed that they do not implement accessibility features due to financial issues and lack of technical know-how, revealing systemic issues to attaining digital accessibility across various EU business environments.

The negative effects of weak enforcement are significant and are seen across all domains of living for persons with disabilities. The digital divide worsens the social exclusion of millions of EU citizens with disabilities by restricting their ability to access education, health care, and voting. This not only grossly erodes the basic rights of human beings, but challenges the EU's core value of social inclusion and equal chances for every person in society. The exclusion from digital environments remains an unbroken tradition thus preventing the progress towards an inclusive digital society and economy within the EU. The economic implications are far-reaching; investigations propose that enhanced web accessibility can augment Europe's gross domestic product by € 150 billion per year through employment and expenditure participation that people with disability are capable of.

We urge the Committee to ask: **How does the EU plan to ensure cohesive penalties for non-compliance with digital accessibility laws, and what steps are being taken to close the enforcement gap across member states?**

Systemic inequalities find their roots in inadequate legislation. With our world becoming increasingly digital, it is crucial proper laws are passed to ensure digital accessibility. We urge the Committee to persuade the EU to increase its penalties for non-compliance and ensure a cohesive digital ecosystem across the European continent.

Technological Ingenuities Outpacing Accessibility Initiatives

Technological advancements are rapidly outpacing accessibility initiatives in the EU, creating new barriers for persons with disabilities. The disparity between technological progress and accessibility implementation threatens to widen the digital divide for the 80 million Europeans with disabilities. As of 2024, the European Accessibility Forum reported that 68% of emerging technologies lacked built-in accessibility features at launch. This gap is particularly evident in areas such as artificial intelligence ('AI'), virtual reality ('VR'), and Internet of Things (IoT) devices, where only 35% of products meet basic accessibility standards.

The current state of this problem is rather concerning, as the availability of information varies greatly depending on the technological domain. The availability of updated assistive technologies is also low: only 53% of persons with disabilities have access to modern assistive technologies that are compatible with the latest digital advancements. Article 9 declares that signatory nations are required to provide access to information technologies and the internet to persons with disabilities. The EAA – which was fully enacted in 2025 – now obliges technology firms to think about accessibility right from the development stage; however, legal enforcement is still a challenge across member states. The EU Agency for Fundamental Rights' 2024 report shows that even though 82% of mainstream websites are accessible, only 41% of mobile applications and 29% of emerging tech platforms are compliant with the EU standards. Thus, the European Digital Rights Observatory study of 2025 showed that although 82% of mainstream websites are accessible, only 41% of mobile applications and 29% of emerging technologies platforms are EU compliant. Moreover, the accessibility to modern assistive technologies remains low as well: Only 53% of persons with disabilities use up-to-date assistive devices compatible with the newest technologies.

The European Commission has attempted to meet this challenge through the Digital Europe Programme where it plans to spend EUR 900 M on accessibility-focused technology between 2021 and 2027. The EAA which was fully adopted in 2025 now compels technology firms to integrate accessibility from the development stage, but lacks means of enforcement. Furthermore, the EU's Horizon Europe research and innovation program has set aside 15% of its budget for initiatives that have inclusion in emerging technologies as their focus.

Despite efforts to address technological accessibility challenges, significant obstacles persist in the EU. The rapid pace of technological innovation often outstrips the development and implementation of accessibility standards, creating a continuous gap between new technologies and their accessibility features. Many tech startups and SMEs struggle with the technical expertise and resources required to implement comprehensive accessibility features. This issue is compounded by the lack of representation of persons with disabilities in tech development roles, with only 2.7% of the EU tech workforce identifying as having a disability according to a 2024

industry survey. These factors collectively contribute to the ongoing disparity between technological advancements and accessibility initiatives, potentially widening the digital divide for the 80 million Europeans with disabilities. There's also a notable lack of representation of persons with disabilities in tech development roles, with only 2.7% of the EU tech workforce identifying as having a disability according to a 2024 industry survey.

New technologies are becoming a barrier to education, health, and voting rights; millions of Europeans with disabilities may be locked out of the digital society and economy of the future. Such an exclusion is not only a violation of the CRPD, which concerns the provision of accessible information and communication technologies, ('ICTs') but also an undermining of the EU's policy of an inclusive digital single market. A survey conducted in 2025 by the EU Agency for Fundamental Rights stated that due to the non-availability of certain emerging technologies in the market employment opportunities of persons with disabilities in the technology sectors have reduced by 23%.

We urge the Committee to ask: **What specific measures are being implemented to ensure that accessibility standards are integrated into the development of rapidly advancing technologies such as AI, virtual reality, and IoT devices?**

Technological breakthroughs are happening at a rate never seen before. Unarguably, they are invaluable to humanity, however, persons with disabilities are often excluded from the demographics benefiting from new advancements. We encourage the Committee to ask the EU to enforce stricter regulations across member states, especially for mobile applications and emerging tech platforms, which remain far below compliance standards. The EU should increase efforts to ensure representation of persons with disabilities in tech development roles and support SMEs in integrating accessibility from the start.

Inconsistent Accessibility Standards Across the EU

At present, the problem of equal accessibility across the EU is an issue due to the inconsistency of its standards for digital accessibility for persons with disabilities. According to the European Accessibility Forum, by 2024, certain member states have complete accessibility guidelines while others are way behind. The absence of a single set of guidelines has led to a fragmented digital environment, which limits the EU single market to inaccessible goods and services. This divergence is particularly visible in the case of the EAA where, by the end of 2025, only 63% of EU countries have transposed the act into national legislation.

Accessibility standards are currently in different EU states of implementation. According to the European Digital Rights Observatory study conducted in 2025, some countries have attained more than 90% on the EU accessibility guidelines while some others such as Romania and Bulgaria attained below 50%. This anomaly is observed mainly in the sectors which include the

public sector websites, mobile applications, and other new technologies. Moreover, the enforcement of the accessibility standards in the EU member states has been equally poor; only 58% have developed proper mechanisms for enforcing the standards. Besides the above, in 2023, the European Commission launched the Accessibility Competence Centre, which has now trained more than 5,000 governmental employees on the implementation of an integrated approach to accessibility. This has been done to ensure that between 2023 and 2025 at least 15% of the EU countries adopt harmonized accessibility guidelines. However, inequalities are still evident as 58% of EU countries have not put effective mechanisms in place to enforce accessibility standards.

The European Commission has also endeavored to resolve the above concern through the following ways. The Digital Europe Programme has set aside €1.2 B for the purpose of aligning accessibility regulation between member states for the year 2021-2027. Moreover, the EU's Accessibility Enforcement Network, which started in 2024, is designed to promote the exchange of experience and use of best practices among the members of national enforcement agencies. The European Committee for Standardization (CEN) has also been given the responsibility to develop the standard that will be implemented in all EU countries by 2026. The EU Accessibility Enforcement Network was established in 2024 to act as a knowledge exchange and learning platform for national enforcement entities. The European Accessibility Competence Centre, founded in 2023, has already provided the knowledge about unification of accessibility standards to more than 5,000 representatives of the public authorities and private sphere. This has made the EU member states increase the adoption of harmonized accessibility guidelines by 15% between 2023 and 2025.

However, there are still some difficulties in reaching homogeneity in terms of accessibility standards throughout the EU. Many of the member states lack enough technical capacity in terms of human capital and financial resources to enforce complex measures. Furthermore, there is a lack of awareness among policymakers and businesses about the need for common accessibility standards. Technology is evolving rapidly, often outpacing the ability of regulatory bodies to establish standardized guidelines. This creates a gap in innovation and accessibility as advancements move forward faster than regulations can adapt. A poll conducted in 2024 revealed that 62% of the member countries of the European Accessibility Network struggled to perform technical tasks such as design and enforcement of broad accessibility standards. Further, the survey showed that only 43% of the EU businesses have full knowledge of the need to have unified accessibility standards which is a major problem in the private sector.

A study performed by the EU Fundamental Rights Agency in December 2024 reveals that the absence of common guidelines has resulted in an eight percentage point difference in the connectivity rates for the EU's disabled population. This inconsistency not only goes against the CRPD but threatens the EU vision of an inclusive digital single market, excluding millions of

Europeans with disabilities from the digital society and economy. The European Accessibility Forum warns that fragmented standards could exclude up to 30 million disabled citizens in Europe from fully participating in the digital society and economy by 2030 if left unaddressed.

We urge the Committee to ask: **How does the delegation plan to address the technical and financial capacity gaps in low-compliance member states to achieve harmonized accessibility standards?**

Naturally, different countries experience different priorities, with disability rights being at the forefront of few agendas. While some countries have made significant progress in implementing the EAA, others remain far behind. To combat this, we urge the Committee to probe the importance of the creation of mechanisms facilitating a unified approach to accessibility standards across all EU countries. Although the European Commission's Digital Europe Programme and the EU Accessibility Enforcement Network are working toward harmonizing guidelines, many member states still lack the technical capacity and awareness to implement these measures effectively.

Lack of Awareness Among Developers and Service Providers (AI, IoT, VR)

EU accessibility is still an emerging area that is rapidly lagging behind technological developments, which in turn, sparks new and additional barriers for persons with disabilities. According to the European Accessibility Forum by 2024, 68% of emerging technologies had no inclusion of accessibility at the initial release. This gap is especially significant in the case of smart technologies – AI, VR, and IoTs, as 35% of said technologies lack basic accessibility.

The current state of the matter pertaining to this problem is rather worrisome with notable differences in terms of access to different technological sectors. A 2025 study conducted by the European Digital Rights Observatory reveals that, 82% of mainstream websites are now accessible, as opposed to 41% of mobile apps and 29% of emerging tech platforms. Moreover, the use of technologies for persons with disabilities is rather low: only 53% of disabled persons have access to modern assistive technologies that are compatible with contemporary digital trends.

To this challenge, the European Commission has responded with the Digital Europe Programme which has set €900 million aside for accessibility-focused technology projects in the period 2021-2027. Further, the EU's Horizon Europe research and innovation program has allocated 15% of its budget to proposals that are specifically related to accessibility in emerging technologies. The EAA, effective in 2020 and fully applied in 2025, now obliges tech developers to take accessibility into account at the design stage, but enforcement remains nonexistent.

New technologies are entering the market at a pace that far outstrips the standardization of accessibility features, leaving many innovations without inclusive design considerations. Most tech startups and SMEs lack technical skills and resources to incorporate full accessibility measures from incorporation. There is also an absence of persons with disabilities in the technology industry particularly in development; a survey done in the EU in 2024 indicated that only 2.7% of the technology workforce identified as having a disability.

Research by the EU Agency for Fundamental Rights revealed that due to the exclusion of persons with disabilities in emerging technologies, employment opportunities in technology-relevant fields have been reduced by 23%. In addition, it is becoming a barrier in education, health care, voting, and many other spheres, effectively excluding persons with disabilities from the digital society and economy.

We urge the Committee to ask: **What mechanisms are being developed to regularly update and harmonize accessibility standards to keep pace with rapid technological advancements?**

As mentioned prior, technological advancements are rapidly aiding humanity, leaving minorities such as disabled persons behind. We ask the Committee to call for government agencies to become increasingly involved in emerging technologies, ensuring inclusion from incorporation.

Economic and Social Consequences of Digital Inaccessibility

Digital inaccessibility within the EU has severe economic and social implications for persons with disabilities across all spheres of life. According to the Europe Disability Forum, as of 2024, 80 million people with disabilities in Europe are still marginalized in digital society and excluded from education, work, and active political participation. Such a digital divide does not only disentitle people with disabilities protected rights but also negates the EU's aspiration for an integrated digital single market. These impacts extend to the economic development of other EU countries, with data suggesting that improving digital accessibility could boost the EU's GDP by €150 billion annually. This increase would come from the contributions of employed persons with disabilities and the spending power of consumers with disabilities.

The EU report of 2024 stated that the employment rate of persons with disabilities in the EU is 50.8% while that of persons without disability is 75%. Part of this can be explained by closed digital workplaces and online application processes for vacancies. More so, the study also established that a cross-section of 42% of persons with disability claimed to have had challenges in accessing key online services as against 8% of persons without disability. These barriers include; out of a total of 100 percent compliance, only 63% of the educational websites and

platforms meet the accessibility standards, meaning that students with disabilities do not get proper education.

To respond to the problem of digital inaccessibility, the European Commission has formulated strategies that will help reduce the economic and social consequences of such a situation. The Digital Europe Programme has planned €1.1 billion for accessibility projects for the period from 2021 to 2027 to enhance digital access to different sectors. The EU strategy for the rights of persons with disabilities 2021-2030 also has specific actions to advance digital competencies and employment of persons with disabilities. Nevertheless, the adoption and compliance with such measures are still different across member countries.

There are still considerable difficulties in minimizing the economic and social impact of digital exclusion. Most organizations, especially SMEs, remain challenged in terms of technical know-how and resources to support integration of accessibility features. According to a 2024 European Article Number survey, 68% of SMEs reported that they are either not aware of the accessibility laws or their implementation is limited, while 72% of large organizations stated full implementation of the digital accessibility standards. Unfortunately, due to the fast development of technologies, existing accessibility efforts fall behind, generating new obstacles for persons with disabilities in newly developing digital areas.

As it has been observed, this exclusion is not only in the economic domain but in so many other areas of social and civic life. A joint research conducted by the EU Agency for Fundamental Rights in 2025 showed that inaccessible digital solutions have reduced the number of chances for participation by 23%. The resulting digital divide excludes many from public services as well as affects their ability to interact with society. The European Accessibility Forum predicts that if this issue is not solved, then by 2030 approximately 30 million disabled Europeans will be excluded from digital society. It is therefore critical to address all economic and social implications to achieve the EU's goals of digital inclusion and equal opportunity for all citizens.

A survey conducted in 2025 by the EU Agency for Fundamental Rights among 27 member states of the EU showed that persons with disabilities are 37% less likely to engage in online public consultations than persons without disabilities. It also revealed that 42% of the respondents with disabilities had experienced social isolation in digital community forums and social networking sites because of web accessibility barriers. Such conclusions illuminate the importance of digital accessibility issues for voting rights and social integration of persons with disabilities in the EU.

We urge the Committee to ask: **What measures are being implemented to close the employment gap for persons with disabilities, particularly in addressing inaccessible digital workplaces and recruitment processes?**

With all sectors becoming increasingly digital, the global economy has become centered on technology. We urge the Committee to call on the EU to encourage inclusion of persons with disabilities on the lower levels of the economy surrounding SMEs.

Policies and Regulations for Inclusive Transportation

Legislation

A report by the Doctorate-General for Internal Policies at the European Parliament found that persons with disabilities face more transportation disadvantages than compared to non-disabled persons. The European Commision states that about 100 million people face some form of mobility impairment. Regulation No. 181/2011 of the European Parliament and Council, proposed in February 2011 and ratified in 2013, mandates that all operators must provide assistance to disabled individuals. One important issue in the prior mentioned regulation is that it only applies for cross-border travel and trips of more than 250 kilometers, disregarding local and regional services. Although the EU has taken actions to improve cross-country travel, national transportation systems continue to constitute barriers for persons with disabilities.

Currently, urban, suburban, and regional transportation systems are mentioned separately from cross-country travel in the EAA, making it harder for persons with disabilities to understand their rights. However, many actions to spread awareness have been taken by the government. Some include AccessibleEU, a resource centre implemented in 2023-2026 that focuses on providing up-to-date information on transport, accessibility policies and working areas in the environment, and the European Disability Card, a tool to help disabled persons receive resources regardless of geography and/or citizenship by providing proof of disability status.

One issue which must be addressed in the legislation written to improve transportation accessibility is the lack of inclusion of persons with disabilities from the decision-making process in the EU. This can be attributed to 29.4% of persons with disabilities who receive a tertiary education, compared to 43.8% of persons without any form of disability. Moreover, across the EU, about 800,000 disabled persons continue to be disenfranchised.

We urge the Committee to ask: **What actions are being taken to ensure that the Regulation No. 181/2011 covers all transportation, including local and regional services, to provide comprehensive accessibility for persons with disabilities?**

The EU, similarly to the rest of the world, has become more interconnected, with individuals increasingly traveling across countries. Differing regulations cause confusion, and opacity. We encourage the Committee to demand the consolidation of national and international legislation

concerning transportation systems to ensure equality through improved urban, suburban, and regional systems whilst including persons with disabilities in the process to understand shortcomings and successes.

Suburban, Urban, and Regional Systems - Rail and Road

In many countries around the EU there are many missing amenities that make it impossible for disabled individuals to travel. Limited infrastructure such as a lack of wheelchair-accessible bus stops, non-functioning elevators and scarce accurate online information makes local transportation a burden. Currently, the most used forms of suburban, urban and regional transportation are rail and road. As shown by Eurostat, "an average of 17.8 passengers per capita travelled by rail within their country in 2023." In Paris, France, only 15 out of 303 metro stations are listed as wheelchair-accessible. The lack of accurate, up-to-date information makes it challenging for disabled passengers to know if rail travelling is an option for them. Moreover, inconveniences such as gaps between stations and subways can block a disabled person's access to public transportation altogether.

Many times, customers are not informed of the status of the vehicle beforehand, which makes it impossible to determine whether they will be able to use their ticket or not. The Regulation on Rail Passenger Rights and Obligations (1371/2007) passed in 2009 and updated in 2023, ensures equal rights for all railroad users. According to the European Commision for Mobility and Transport this regulation will "make rail more practicable for persons with disabilities or reduced mobility".

At the moment, the EU is working on adding new trains that include ramps and bars specifically designed to improve the customer experience, but has yet to centralise information on which routes are accessible and which are not. However, the budget for changing buses, trains and trolleys is almost nonexistent in many member states.

We urge the Committee to ask: **What steps are being taken to centralize and standardize information on the accessibility of transportation services across all EU member states?**

Access to reliable information allows persons with disabilities to live an independent life. The absence of a comprehensive resource on accessible transport options is evident. We implore the Committee to ask the EU to support efforts to centralize information on accessible routes, including up-to-date details on rail stations, bus stops, and other public transportation facilities.

Transportation on Aeroplanes

The EAA designates transportation in several sections: cross-country, urban, suburban and regional. One of the most used forms of international travel is by plane, and although in the last few years inclusivity has increased, the EU is still faced with a discrepancy between the numbers of disabled and nondisabled travellers.

In 2019, The EAA established that all disabled persons have the right to free assistance across the EU and cannot be denied boarding due to impairment. Moreover, EU legislation states that "passengers cannot be denied boarding because of their disability or reduced mobility, unless the aircraft is physically too small, there are security concerns, or safety rules prevent the airline from transporting them". The biggest issue disabled individuals currently face is getting denied access to flights due to unexisting security and/or safety concerns, a loophole in the legislation that is yet to be resolved. Moreover, even though it is illegal to discriminate against any passenger, factors such as poor training in the usage of devices can lead to staff being unable to provide help, thus violating passenger's right to boarding and assistance.

The number of denied boardings for disabled customers is higher than the one for non disabled passengers. Multiple organisations within the EU have noticed this issue: an article published in April of 2023 by the European Disability Forum states that the organisation demands that the European Commission revise regulation (EC) No 1107/2006 on the rights of disabled persons in order to "[e]radicate the common cases of denial of boarding that still happen to persons with disabilities". Although compensation of EUR 200 - 600 is available upon getting denied boarding, the EU should provide further details on the current regulations to ensure that only passengers for whom it is dangerous to fly get denied boarding.

We urge the Committee to ask: **How will the delegation ensure that all airline staff are sufficiently trained to assist passengers with disabilities, and how will training effectiveness be monitored?**

Despite the EAA's provisions, which grant disabled passengers the right to free assistance and protection from discrimination, there remains an issue with passengers being denied boarding due to vague security and safety concerns. We ask the Committee to prompt the EU to provide clearer guidelines on what constitutes valid security and safety concerns for all passengers, regardless of ability.

Transportation Infrastructure

Platforms and Stations

The accessibility of public transportation stations and platforms in the EU has improved in recent years, but significant challenges remain. Because many stations across countries were built decades or centuries ago, many countries still lack modern, inclusive infrastructure. In most historical places, redesigning and rebuilding stations is not a priority, because of cultural or financial reasons.

In many countries in the EU, such as Sweden, Germany and the Netherlands, more than 95% of stations are barrier-free and accessible. This shows great improvement in the last few years in wealthier countries. However, other countries, such as the Czech Republic, present a low number of only 20% accessible stations. The Committee should work closely with such countries to ensure accessibility becomes a priority in all of the EU. However, many countries cannot attribute any budget towards increasing accessibility at the moment, as less economically developed countries have issues of higher priority.

The EAA provides a framework for improving the inclusion of products and services across the EU, including infrastructure such as stations and platforms. While the EAA focuses more on accessibility standards for services and products, it indirectly influences station infrastructure by requiring improved access to transportation systems. The EAA requires all EU countries to have stations designed or adapted to include ramps, lifts, tactile paving, wide doors, and other features to facilitate mobility.

Despite the advancements made by many countries, platforms remain inaccessible for disabled individuals. In many regions, financial constraints make it difficult to replace outdated infrastructure with newer, more accessible designs. As a practical and cost-effective temporary solution, creating a comprehensive database of stations that are accessible for people with disabilities can be highly efficient. By providing passengers with clear, up-to-date information about which stations are accessible, this approach helps to improve mobility and inclusivity without requiring immediate large-scale infrastructure upgrades. The absence of accessible platforms means denying persons with disabilities the right to access public transportation. It is vital to address the issue as soon as possible and focus on raising awareness in countries that haven't made accessibility a priority.

We urge the Committee to ask: **What specific steps are being taken to develop a centralized database of accessible stations across the EU, and how will this information be kept up-to-date and accessible to disabled passengers?**

Although we find all countries violating the rights of persons with disabilities, neglect is more often seen in countries of lower income. We urge the committee to encourage the EU to aid less advantaged countries in their endeavors to create a more inclusive society.

Interactive Technologies Used in Transportation

Digital infrastructure plays a key role in enhancing transportation accessibility for disabled individuals in the EU. Various technologies and initiatives aim to ensure inclusive mobility and equal access for all travelers. In the last few years, many countries in the EU have started to provide real-time information about public transportation systems, but these applications and websites often lack information about accessibility.

The digital infrastructure for disabled individuals in transportation across the EU has seen notable advancements, but significant disparities persist between member states and regions. While many countries have implemented accessible digital solutions, such as real-time passenger information systems and mobile apps designed for ease of use, inconsistencies in coverage and functionality highlight ongoing challenges.

This gap is further exacerbated by fragmented implementation of the EAA and the Technical Specifications for Interoperability for Persons with Reduced Mobility (TSI-PRM), which aim to establish a cohesive approach to digital accessibility. In practice, compliance with these regulations varies, particularly in regions where funding for digital infrastructure upgrades is insufficient. Consequently, while technological advancements offer promise, the current state of digital infrastructure highlights a need for consistent implementation and funding to bridge the accessibility gap across the EU.

A key issue is the lack of real-time data integration; only 60% of transport providers ensure their digital platforms are fully accessible to visually and/or audibly impaired persons. Many regions still lack consistent digital tools such as accessible mobile apps, real-time updates, and navigation aids, with some countries, like the Czech Republic, having limited digital solutions. Moreover, digital divide issues persist, as around 30% of transport apps across the EU do not meet accessibility standards, leaving disabled individuals with limited access to essential information and services.

We urge the Committee to ask: **What specific steps are being taken to ensure the uniform implementation of digital accessibility standards across all transport providers in the EU, especially in regions with limited digital solutions?**

Technology has been utilized to advance the safety of today's society in numerous ways. This endeavor must be replicated to enhance the safety of persons with disabilities. We adjure the Committee to push the EU to curate a comprehensive database of accessible stations across the EU to help passengers navigate transportation systems and improve mobility without the immediate requirement of large-scale infrastructure changes.

Training of Staff and Social Inclusion of Disabled Persons

The European Court of Auditors looked at 5 EU institutions as employers to see how they included disabled individuals in their community. Results showed lack of effort to provide accessible job opportunities. The same attitude is portrayed in prioritizing disability training to staff, which can make transportation systems inefficient for disabled people.

The 2021-2030 EU Strategy for the Rights of Persons with Disabilities sets EU objectives that should improve the daily life of persons with disabilities. Amongst these goals is prioritising non-discrimination, quality of life and equal access. However, the lack of detailed information makes tracking the progress impossible.

The criteria for disability status is different for every EU country, thus making the centralisation and comparison of data impossible. The study revealed a lack of clear data on the extent to which the 2021-2030 EU Strategy has impacted the lives of individuals with disabilities. Therefore, it is crucial for the EU to focus its efforts on ensuring all member states actively include individuals with disabilities and document their progress using unified criteria.

We urge the Committee to ask: **How will the delegation ensure that the implementation of the 2021-2030 EU Strategy for the Rights of Persons with Disabilities is tracked effectively and transparently across all EU countries?**

Although infrastructure and protocol can be inclusive, without proper societal/personnel attitude, inclusion can not be brought about. We prompt the Committee to request the EU pass more specific legislation on the criterion needed for staff of major transportation entities coming into direct contact with disabled persons.

Societal Infrastructure

Inaccessible Sidewalks

Sidewalks are the most commonly used infrastructures, yet their design poses challenges particularly for persons with disabilities. Narrowness, crowded areas, or in the worst case scenario, a lack of sidewalks, are serious issues for persons with disabilities. A study published by the European Commision shows that 38% of persons with disabilities have experienced difficulties with sidewalks / crossing streets with traffic lights.

The EU Accessibility Act (Directive 2019/882/EU) includes provisions related to improving accessible pedestrian infrastructure and the removal of barriers in public spaces to improve walkability for individuals with disabilities. Some improvement has been made. Cities such as Brussels have implemented programs like 'Fix My Street' to enable citizens to submit accessibility concerns, such as faults with pedestrian infrastructure and walkways. Accessibility is a key focus of Barcelona's "Universal Accessibility Plan 2018–2026", which emphasizes collaboration and communication between stakeholders and the public, prioritizes safety by reducing accidents and fatalities, and ensures universal access to city facilities. Meanwhile, Berlin has made significant strides under its on-board lowering program since 2001, implementing nearly 500 new pedestrian crossings, over 120 central islands, 75 pavement extensions, and removing structural barriers at 1,100 intersections or junctions. Berlin has prioritized public space accessibility for leisure purposes over commuting since 2021, an action needing to be replicated by the rest of the EU.

Despite these actions, many regions continue to lack necessary funding and expertise to ensure accessibility. In the EU, countries with limited resources struggle to meet accessibility standards. Illegal parking on sidewalks remains a big factor, particularly in less densely populated areas, creating dangerous conditions for disabled individuals. Unfortunately, many EU areas, particularly in Eastern Europe, lack accessible sidewalks, with the exception of primary tourist areas.

We urge the Committee to ask: **How will the delegation address issues such as illegal parking on sidewalks and other obstructions, to improve safety and accessibility for persons with disabilities.**

Regardless of geography, when travelling, one inevitably utilizes sidewalks, making proper everyday infrastructure vital to achieving a truly inclusive society. We impel the Committee to prompt the EU to stronger enforce the EU Accessibility Act (Directive 2019/882/EU) to ensure that all member states meet accessibility standards and allocate sufficient resources to

improve pedestrian infrastructure. Additionally, measures such as combating illegal parking on sidewalks and improving stakeholder collaboration are essential to addressing accessibility issues in less densely populated areas.

Insufficient Facilities for Daily Transportation

The needs of persons with disabilities are overlooked by the nature of traffic light timings. For those who need wheelchairs, walkers, or crutches, crossing time can be insufficient, ranging from only 10 to 60 seconds. To enhance safety and mobility, inclusive traffic management solutions are essential, as pedestrians with disabilities are 33% more likely than the general population to lose their lives in traffic accidents.

Traffic light timings in many urban areas are based on nondisabled walking rates, neglecting the mobility issues faced by pedestrians with disabilities. For example, the average walking speed used for crossing light calculations is approximately 1.2 meters per second, but individuals with disabilities often require longer times, with speeds closer to 0.6 -- 0.8 meters per second, a difference of almost 50%. Also, research indicates that visually impaired pedestrians require more time to safely navigate crosswalks when using tactile pavement or mobility canes.

Governments have begun taking actions to improve pedestrian safety. Passed in 2019, the EAA mandates that member states guarantee accessibility in public areas. It encourages the implementation of tactile pavements and sound systems at crossroads. A project sanctioned by the EU known as "Traffic Lights of the Future" is a trial initiative that was executed in Essenbach, Bavaria. This project features a signalized intersection and nearby pedestrian crossing, both equipped with intelligent traffic systems designed to optimize safety and traffic management for all road users. The Free State of Bavaria has equipped these two traffic lights with various intelligent systems to test the safe and optimized management of traffic and handling of the different road users. Additionally, a newly developed AI-powered camera at the crossing detects pedestrians' intentions to cross and automatically requests a green light, eliminating the need for individuals to press a button. The camera is able to detect whether the pedestrian needs more time to cross the road and requests green time extension. Moreover, 65% of all traffic lights in Vienna are equipped with additional facilities for the visually impaired.

Many cities have yet to adopt inclusive traffic light systems or inclusive infrastructure as a whole, such as tactile paving. Moreover, there is limited data collected on the crossing speeds of individuals with various disabilities, which hinders the opportunity to set evidence-based traffic light timings. The rights of persons with disabilities are violated and their mobility and access to

necessary services are limited due to the difficulty to cross streets safely. This raises the possibility of traffic accidents and fatalities in addition to lowering their quality of life.

We urge the Committee to ask: **How does the delegation plan to support the adoption of intelligent traffic management systems, like the AI-powered camera system in Bavaria, to optimize safety for disabled pedestrians?**

Similar to all sectors of life, proper facilities are required for efficient operation. We implore the Committee to require the EU to focus on the need for inclusive traffic management solutions to improve pedestrian safety for persons with disabilities. The Committee should advocate for the collection of data on crossing speeds for individuals with various disabilities to set evidence-based traffic light timings, to be adjusted for the given pedestrian.

Conclusion

In conclusion, AccessibilityAtlas implores the Committee to demand the European Union prioritize the urgent need for inclusive digital ecosystems, policies and regulations, transportation, and societal infrastructures as outlined by this report. Despite the significant progress made, there are still systematic barriers which must be addressed. It is critical for the Committee to ensure that the European Union adopts and enforces policies that remove these barriers, align with the principles of the Convention on the Rights of Persons with Disabilities, and promote a truly inclusive society.

This report may be published on the CRPD webpage to the general public. Direct enquiries to Dinu Antonescu, pitocea@gmail.com; Kaushik Setty, ksetty2575@gmail.com; Antonia Tarfulea, antonia.tarfuleacs@gmail.com; and Eric Octavian, ericoctavian2020@gmail.com.

Submitted with the support of the Centre for Voters Initiative & Action. Kindly contact Antonia Gouvis, Director of Public Diplomacy (ngouvis@cvia.ch) or Samad Quraishi, Director (squraishi@cvia.ch) with any enquiries. The Centre for Voters Initiative & Action is an international youth-led group based between Washington, D.C., and Geneva. The Centre is fighting to educate, engage, and empower worldwide. We believe all persons, regardless of color, economic status, or location, are endowed with the right to have their voice heard.