



EUROPEAN UNION OF THE DEAF

A European Non-Governmental Organisation in official liaison
with European Parliament, European Commission
and the Council of Europe

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EUD Proposed Amendments to the European Parliament Draft Report on the proposal for a regulation of the European Parliament and of the Council establishing the Erasmus+ programme for the period 2028-2034

The European Union of the Deaf (EUD) is the only supranational organisation representing Deaf people at the European level and its membership is composed of National Associations of the Deaf from 26 EU Member States, in addition to Iceland, Norway, Switzerland and the United Kingdom. It is a full member of the European Disability Forum, and holds consultative status with the UN and the Council of Europe.

Before addressing the amendments, the EUD wishes to recall that deaf communities hold a dual identity as the EUD's 2026 position paper [Deaf Communities and Minority Rights at the EU Level](#) argues: they are simultaneously persons with disabilities and members of cultural and linguistic minorities, a duality that EU policy has consistently failed to reflect by approaching deaf communities almost exclusively through a disability and accessibility lens. Addressing deaf communities through a linguistic and cultural minority lens therefore falls squarely within the mandate of the Erasmus+ programme. Sign language recognition is fundamentally a matter of linguistic rights, not merely of disability accommodation.

EUD welcomes the CULT Committee Draft Report on the proposed Erasmus+ programme for the period 2028-2034. The EUD submits the following proposed amendments with three priorities in mind:

1. Sign languages and deaf culture: Deaf communities have distinct linguistic and cultural identities rooted in national sign languages, forming an integral part of Europe's multilingual and multicultural heritage. The Erasmus+ programme should explicitly recognise and support this heritage, including through activities promoting the learning and use of national sign languages.
2. Accessibility and inclusion: Deaf and hard-of-hearing people, and persons with disabilities more broadly, continue to face structural barriers to Erasmus+ participation. The programme should guarantee accessible content and ensure accessibility in its own implementation, including application procedures, national agency outreach and grant conditions. National agencies must be equipped through a dedicated accessibility budget, trained staff and diversity in its evaluation panels to assess and enforce real inclusion in funded projects.
3. Inclusion costs: Co-funding requirements and administrative burdens disproportionately disadvantage disability and deaf organisations covering accessibility costs for their participants. EUD proposes a dedicated, fully-funded inclusion budget line, covering sign language interpretation and accessible formats, sitting outside simplified cost options and available to all applicants as a non-deductible addition to grant amounts, across all Key Actions and not just Learning mobilities, addressing the gap in the current 2021-2027 programme.

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Recital 1a

Initial text amended	Proposed amendments
<p>(1a) The Union is a community of values rooted in Europe's history and identity and anchored in the Treaty on the EU. Understanding those values, including fundamental rights and democracy, is an essential life skill and key to participation in the political debate and decision making. Education, training, youth, volunteering and sport activities help equip citizens with the skills and competences to thrive, actively and meaningfully participate in democratic life and in the society overall, and help people connect around and defend shared values.</p>	<p>(1a) The Union is a community of values rooted in Europe's history, multilingualism, multiculturalism, and identity and anchored in the Treaty on the EU. Understanding those values, including fundamental rights and democracy, is an essential life skill and key to participation in the political debate and decision making. Education, training, youth, volunteering and sport activities help equip citizens with the skills and competences to thrive, actively and meaningfully participate in democratic life and in the society overall, and help people connect around and defend shared values.</p>

Justification: The EU's linguistic and cultural diversity extends beyond official languages to include regional, minority and national sign languages, each carrying distinct cultural heritage. This amendment ensures the recital reflects the full breadth of Europe's multilingual and multicultural reality. It also aligns with recital 26, which addresses language learning including, where relevant, national sign languages.

Recital 4

Initial text amended	Proposed amendments
<p>(4) It is essential that all people, irrespective of their personal, social, economic, geographic or cultural background, have the opportunity to participate in a mobility experience abroad from an early age, when values and attitudes are formed and when individuals are most receptive to new experiences and influences. Early exposure to different environments, cultures, languages and ways of life can help to break down stereotypes, promote intercultural understanding, and instil values of respect, tolerance and solidarity, thereby contributing to a more united and harmonious Europe.</p>	<p>(4) It is essential that all people, irrespective of their personal, social, economic, geographic, linguistic, disability-related or cultural background, have the opportunity to participate in a mobility experience abroad from an early age, when values and attitudes are formed and when individuals are most receptive to new experiences and influences. Early exposure to different environments, cultures, languages and ways of life can help to break down stereotypes, promote intercultural understanding, and instil values of respect, tolerance and solidarity, thereby contributing to a more united and harmonious Europe.</p>

Justification: Linguistic and disability-related barriers remain among the most significant obstacles to mobility participation. This amendment ensures that learners with disabilities and those from linguistic minority backgrounds, including deaf sign language users, are explicitly recognised and not overlooked in the programme's inclusiveness commitments.

Recital 6

Initial text amended	Proposed amendments
<p>(6) In line with the EU Preparedness Union Strategy, preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions to play a key role in fostering digital and media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU should engage actively to prevent crises and to be sufficiently prepared to respond to them.</p>	<p>(6) In line with the EU Preparedness Union Strategy, preparedness, resilience, participation in democratic life and civic engagement should be fostered through a bottom-up approach, encouraging organisations and institutions to play a key role in fostering digital and accessible media literacy, critical thinking, promoting civic engagement, and learning about democracy and citizenship. People and communities across the EU should engage actively to prevent crises and to be sufficiently prepared to respond to them.</p>

Justification: Digital and media literacy is a prerequisite for effective preparedness and crisis response. Adding "accessible" ensures that people with fewer opportunities, including those with disabilities or from linguistic minority backgrounds, including deaf people, can fully access and benefit from these resources, given their significant role in community resilience.

Recital 17

Initial text amended	Proposed amendments
<p>(17) The implementation of the Programme should be guided by the principles and values of respect for human dignity, freedom, democracy, equality and the rule of law, and solidarity, as respectively enshrined in Article 2 of the Treaty of the European Union and referred to in the preamble of the Charter of Fundamental Rights of the European Union. It is thus essential that all parties involved in the Programme respect those principles and values. The Programme should as well respect the principles set out in the 2017 EU Guidelines for the Promotion and Protection of the Rights of the Child and of the UN Convention on the Rights of Persons with Disabilities as well as the Union of Equality strategies.</p>	<p>(17) The implementation of the Programme should be guided by the principles and values of respect for human dignity, freedom, democracy, non-discrimination, equality and the rule of law, and solidarity, as respectively enshrined in Article 2 of the Treaty of the European Union and referred to in the preamble and Articles 20 and 21 of the Charter of Fundamental Rights of the European Union. It is thus essential that all parties involved in the Programme respect those principles and values. The Programme should as well respect the principles set out in the 2017 EU Guidelines for the Promotion and Protection of the Rights of the Child and of the UN Convention on the Rights of Persons with Disabilities as well as the Union of Equality strategies.</p>

Justification: The Commission's explanatory memorandum identifies fundamental rights as a cross-cutting dimension of the Programme (section 3, "Results of Retrospective Evaluations, Stakeholder Consultations and Impact Assessments") and Article 2 §1 (12) of the text proposed by the Commission

addresses Article 21 of the Charter. Recital 17 already references the preamble of the Charter but omits the principle of non-discrimination enshrined in Articles 20 and 21 of the Charter, which prohibits discrimination on grounds including disability and language. This amendment remedies that gap, ensuring the Programme's guiding principles explicitly cover non-discrimination.

Recital 33

Initial text amended	Proposed amendments
(33) The Programme should be designed to promote inclusion, diversity and equal opportunities by widening access to mobility, volunteering and learning across the Union and beyond, thereby enabling all people to fully benefit from a transformative experience.	(33) The Programme should be designed to promote inclusion, diversity, non-discrimination and equal opportunities by widening access to mobility, volunteering and learning across the Union and beyond, thereby enabling all people to fully benefit from a transformative experience.

Justification: Despite Erasmus+'s stated inclusion goals, deaf and hard-of-hearing participants have experienced discrimination in funded activities in recent years, notably through the absence of sign language interpretation and accessible formats during mobility and learning activities. Explicitly referencing non-discrimination is necessary to signal that the Programme must actively prevent exclusionary practices, in line with Article 21 of the Charter of Fundamental Rights and Article 5 of the UN Convention on the Rights of Persons with Disabilities, and with Article 2 §1 (12) of the text proposed by the Commission.

Recital 34

Initial text amended	Proposed amendments
(34) The Programme should provide for a set of measures to facilitate and increase the access for people with fewer opportunities, to remove the obstacles that may prevent such access, including financial ones, and to serve as a basis for further implementation guidance. Those measures include, among other, targeted financial support taking into account the difference of actual living and subsistence costs, accessible learning formats and assistance, housing support, preparatory activities and support for participants with fewer opportunities before, during and after their participation within the Programme, user-friendly and accessible documents available in different languages, support activities for staff dealing specifically with inclusion and diversity in organisations and raising awareness activities among potential participants with fewer opportunities, including in rural and remote areas in cooperation with regional and local authorities. In addition, the Programme should allow to give priority in	(34) The Programme should provide for a set of measures to facilitate and increase the access for people with fewer opportunities, to remove the obstacles that may prevent such access, including financial ones, and to serve as a basis for further implementation guidance. Those measures include, among other, targeted financial support taking into account the difference of actual living and subsistence costs, accessible learning formats and assistance, housing support, preparatory activities and support for participants with fewer opportunities before, during and after their participation within the Programme, user-friendly and accessible documents available in different languages, including national sign languages , support activities for staff dealing specifically with inclusion and diversity in organisations and raising awareness activities among potential participants with fewer opportunities, including in rural and remote areas in cooperation with regional and local authorities. In addition, the

<p>the grant awarding process to quality projects that actively address the inclusion and involvement of participants with fewer opportunities. To that end, synergies with other Union funding instruments, such as National and Regional Partnership Plans and funding delivered through them such as the European Social Fund, should be exploited.</p>	<p>Programme should allow to give priority in the grant awarding process to quality projects that actively address the inclusion and involvement of participants with fewer opportunities, developed in co-design with organisations representing persons with disabilities. To that end, synergies with other Union funding instruments, such as National and Regional Partnership Plans and funding delivered through them such as the European Social Fund, should be exploited. Accessibility costs, including sign language interpretation and other disability-related support, should be covered through dedicated funding outside project lump sums.</p>
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Justification: User-friendly documents should be available in national sign languages, in line with recital 21, as deaf people's access to information depends critically on communication in their own language in line with Article 21 of the UNCRPD. Despite existing inclusion measures, deaf and hard-of-hearing participants in Erasmus+ funded activities have repeatedly faced situations where formal access was granted but necessary accessibility, notably sign language interpretation, was absent or inadequate, or where their participation was superficial rather than meaningful, without real involvement in project design and implementation. Absorbing accessibility costs within existing project lump sums effectively penalises inclusive projects and deters genuine participation; dedicated funding is therefore necessary. Projects prioritised in the grant awarding process should equally be developed in co-design with organisations representing persons with disabilities, in line with Article 4(3) CRPD, to guarantee truly inclusive projects responding to the needs of participants with disabilities.

Recital 40

Initial text amended	Proposed amendments
<p>(40) In order to simplify requirements for beneficiaries, simplified cost options in the form of lump sums, unit costs and flat rates should be used to the maximum possible extent. Simplified cost options to support learning mobility under the Programme should be determined in line with the actual living and subsistence costs in the host country. In accordance with national law, Member States should be encouraged to exempt those grants from any taxes and social levies; grants awarded to individuals by public or private legal entities should be treated in the same manner.</p>	<p>(40) In order to simplify requirements for beneficiaries, simplified cost options in the form of lump sums, unit costs and flat rates, supplemented by dedicated inclusion costs, should be used to the maximum possible extent. Simplified cost options to support learning mobility under the Programme should be determined in line with the actual living and subsistence costs in the host country. In accordance with national law, Member States should be encouraged to exempt those grants from any taxes and social levies; grants awarded to individuals by public or private legal entities should be treated in the same manner.</p>

Justification: Absorbing accessibility and inclusion costs within lump sums effectively reduces the resources available to beneficiaries for the core project activities, disproportionately penalising projects involving participants with disabilities and undermining the Programme's inclusion objectives.

Article 2 – paragraph 1 – point 12

Initial text amended	Proposed amendments
<p><i>(12) ‘people with fewer opportunities’ means people who, for economic, social, cultural, geographical or health reasons or due to their migrant background, or for reasons such as disability or educational difficulties or for any other reason, including a reason that could constitute discrimination under Article 21 of the Charter of Fundamental Rights of the European Union, face obstacles or structural or situational barriers that prevent them from having effective access to opportunities under the Programme;</i></p>	<p><i>(12) ‘people with fewer opportunities’ means people who, for economic, social, linguistic, cultural, geographical or health reasons or due to their migrant background, or for reasons such as disability or educational difficulties or for any other reason, including a reason that could constitute discrimination under Article 21 of the Charter of Fundamental Rights of the European Union, face obstacles or structural or situational barriers that prevent them from having effective access to opportunities under the Programme;</i></p>

Justification: Deaf sign language users face a distinct linguistic barrier to accessing Erasmus+ opportunities, as the Programme's communications, procedures and activities are predominantly conducted in spoken and written languages. Explicitly recognising linguistic barriers ensures deaf and hard-of-hearing people are covered by this definition, in line with Articles 2 and 21 of the UNCRPD.

Article 8 – paragraph 3

Initial text amended	Proposed amendments
<p><i>3. The Commission shall support access to the Programme from an early age and independent of socio-economic background. To achieve that, it shall ensure the provision of measures to facilitate the participation of people with fewer opportunities, including financial support mechanisms and pre-financing, targeted information, guidance, and tailored support services, where relevant.</i></p>	<p><i>3. The Commission shall support access to the Programme from an early age and independent of socio-economic background. To achieve that, it shall ensure the provision of measures to facilitate the participation of people with fewer opportunities, including financial support mechanisms and pre-financing, targeted and accessible information, guidance, and tailored support services, where relevant, as well as dedicated budgets for national agencies to ensure accessibility of their services and activities.</i></p>

Justification: National agencies, as the primary interface between the Programme and applicants, play a crucial role in outreach, promotion and guidance. However, their information and communication activities, including promotional materials, information sessions, guidance meetings and workshops, are frequently inaccessible to deaf and hard-of-hearing people, notably through the absence of sign language interpretation and accessible formats. Ensuring accessibility at this level requires a dedicated budget, as these costs cannot reasonably be absorbed within existing operational resources without compromising the quality and reach of national agencies' core activities.

Article 8 – paragraph 6

Initial text proposed by the Commission	Proposed amendments
<p>6. The national agencies referred to in Article 19 shall develop or update where relevant, national inclusion and diversity action plans, based on the framework, and with particular attention to the specific challenges to access the programme within the national contexts. The national inclusion and diversity plans shall form an integral part of the national agencies' planning documents as referred to in Article 19(2).</p>	<p>6. The national agencies referred to in Article 19 shall develop or update where relevant, national inclusion and diversity action plans, based on the framework, and with particular attention to the specific challenges to access the programme within the national contexts, to the internal accessibility measures adopted, the awareness-raising of their staff, and the diversity in their staff and external evaluators. The national inclusion and diversity plans shall form an integral part of the national agencies' planning documents as referred to in Article 19(2).</p>

Justification: Accessibility and inclusion cannot be limited to external communication; they must equally be embedded in national agencies' internal operations. Staff who lack awareness of the specific barriers faced by deaf and hard-of-hearing participants, and evaluation panels that do not reflect the diversity of the Programme's target groups, are unlikely to recognise exclusionary practices in project applications and reports, or to assess meaningfully whether proposed and implemented activities are truly inclusive. Dedicated budgets for internal accessibility measures, systematic staff awareness-raising, and diversity in evaluators are therefore necessary conditions for the Programme's inclusion objectives to be effectively assessed and enforced at national level.

Article 12 – paragraph 5

Initial text proposed by the Commission	Proposed amendments
<p>5. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to costs or, where necessary, simplified cost options, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise.</p>	<p>5. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to costs or, where necessary, simplified cost options, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise, including to cover inclusion and accessibility costs.</p>

Justification: While actual cost reimbursement for accessibility is available under certain Key Action 1 activities of the Erasmus+ programme 2021-2027, no equivalent mechanism exists for Key Action 2, leaving beneficiaries to absorb inclusion and accessibility costs within simplified cost options. This amendment ensures a general basis for actual cost reimbursement of inclusion and accessibility costs across all actions where needed, preventing the Programme's funding architecture from becoming a structural barrier to inclusion.

Article 16 – paragraph 2

Initial text proposed by the Commission	Proposed amendments
2. The national agencies referred to in Article 19 shall assist the Commission in its general task of disseminating information concerning the Programme, including information in respect of actions and activities managed at national and Union level, and its results. National agencies shall inform relevant target groups about the actions and activities undertaken in their respective countries.	2. The national agencies referred to in Article 19 shall assist the Commission in its general task of disseminating information concerning the Programme, including information in respect of actions and activities managed at national and Union level, and its results, in accessible formats and, where relevant, in national sign languages . National agencies shall inform relevant target groups about the actions and activities undertaken in their respective countries.

Justification: National agencies are the primary point of contact for prospective applicants and participants. For deaf and hard-of-hearing people, inaccessible dissemination, whether through the absence of sign language interpretation, captioning or accessible formats, constitutes a barrier at the earliest stage of engagement with the Programme, effectively excluding them before any application is made. Requiring national agencies to disseminate information in accessible formats and national sign languages ensures that the Programme's reach extends to deaf people and their representative organisations.

Article 20 – paragraph 5

Initial text proposed by the Commission	Proposed amendments
5. The Commission shall make the following Programme funds available to the national agency: (a) a contribution for grant support for the Programme actions the management of which is entrusted to the national agency; (b) a contribution in support of the national agency's Programme management tasks; (c) if relevant, an additional contribution for actions under Article 7, points (a) and (b).	5. The Commission shall make the following Programme funds available to the national agency: (a) a contribution for grant support for the Programme actions the management of which is entrusted to the national agency; (b) a contribution in support of the national agency's Programme management tasks, including for accessibility ; (c) if relevant, an additional contribution for actions under Article 7, points (a) and (b).

Justification: The contribution provided under point (b) covers national agencies' operational costs for managing the Programme. Without a dedicated accessibility component within this contribution, national agencies lack a structural funding basis to make their own operations, including outreach, guidance, information sessions and staff training, accessible to deaf and hard-of-hearing people and other participants with disabilities. The current 2021-2027 programme has demonstrated that accessibility at national agency level is systematically underfunded, resulting in inaccessible promotional and guidance activities that exclude potential applicants before they can even engage with the Programme. A dedicated component under point (b) addresses this gap at source.