



The voice of blind and partially sighted people in Europe

European Blind Union response to the European Commission's public consultation on making the European statistical system fit for the future

EBU Position Paper | March 2022

Aim of the consultation

The European Commission's stated aim is "to respond better to new information needs and user expectations". It will align the legal framework on EU statistics with the European data strategy and modernise how statistics are produced. More specifically, it will tap the potential of new data sources, make the statistical system more responsive, specify new roles in emerging data ecosystems, and update the tasks of statistical authorities.

Response

To make the European statistical system "fit for the future" from the point of view of EBU, it is necessary to ensure that it enables the EU and Member States to deliver on their obligations under the UN Convention on the Rights of Persons with Disabilities (CRPD).

[Article 31 of the CRPD](#) (Statistics and data collection) says that "States Parties undertake to collect appropriate information, including statistical and research data, to enable them to formulate and implement policies to give effect to the present Convention" and that "The information collected in accordance with this article shall be disaggregated, as appropriate, and used to help assess the implementation of States Parties' obligations under the present Convention and to identify and address the barriers faced by persons with disabilities in exercising their rights."

It is a welcome development that, to deliver on its Disability Rights Strategy, the EU intends to have a [disability breakdown](#) in all existing data collections, and in particular in the EU Labour Force Survey from 2023.

However, we deplore that no progress has been made yet toward a [harmonised definition of disability](#)—if only depending on the type of survey—for statistical purposes, to generate meaningful, reliable, and comparable data across the EU.

We also find unacceptable that the approach to disability taken in the Eurostat database is from the health perspective, instead of a [rights-based approach](#) in line with the CRPD.

Moreover, we call on the EU to at last address the issue that, admittedly, in the current setting, Eurostat is unable to generate data [disaggregated by type of disability](#), other than from the health approach, and even so, only every three years.

The concerned civil society organisations, policy makers, and other stakeholders need to have visual impairment-specific data to inform their action to promote more effective inclusion of around 30 million people with visual impairment in Europe.

About EBU

The European Blind Union (EBU) – [Interest Representative Register number 42378755934-87](#) – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 25 European Union member states, candidate countries and other countries in geographical Europe.

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