



Raising standards for consumers

POSITION PAPER

ANEC position on enhancing the European Commission strategy for the rights of persons with disabilities up to 2030



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ANEC is supported financially by
the European Union & EFTA



Ref: ANEC-ACCESS-2026-G-007

04/02/2026

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EXECUTIVE SUMMARY

ANEC considers accessibility to be a core element of consumer protection and a prerequisite for an inclusive and well-functioning Single Market. Without accessibility, consumers with disabilities and older consumers cannot fully exercise their rights, use products safely, or participate equally in economic and social life.

ANEC advocates for accessibility to be embedded from the earliest stages of product and service development rather than addressed through retrofitting or optional features. ANEC promotes this approach through its participation in European and international standardisation, ensuring that accessibility requirements are clear, measurable, and grounded in real user needs. This work is carried out in close cooperation with the disability movement and in line with the United Nations Convention on the Rights of Persons with Disabilities.

ANEC has also contributed extensively to EU legislation and strategies related to accessibility, product safety, digitalisation, and market surveillance. It strongly supports the objectives of the European Accessibility Act as an important step towards harmonised accessibility requirements for key products and services. However, ANEC regrets that the Act does not sufficiently cover the built environment, which limits its practical impact. In ANEC's view, inaccessible buildings, public spaces, and transport infrastructure undermine consumer rights. Binding, harmonised EU-level accessibility requirements for the built environment are therefore essential.

ANEC also stresses the lack of accessibility of domestic appliances, which are essential for independent living and everyday safety. Many appliances remain inaccessible due to poorly designed controls, displays, signals, and instructions. ANEC calls for mandatory, measurable accessibility requirements for household appliances, stressing the close link between accessibility and safety.

Effective enforcement is a recurring concern in our work. Accessibility requirements must be supported by strong market surveillance, adequate resources, and proper training for authorities. ANEC calls for accessibility to be more systematically integrated into EU product and digital legislation and checked as part of compliance assessments, including for products sold online and imported into the Single Market.

ANEC believes that only a comprehensive approach addressing both accessible products and accessible environments, backed by effective enforcement and inclusive standardisation, can deliver meaningful and lasting inclusion for all consumers in the EU.



1 | Accessibility of goods, services and the built environment for all consumers

For ANEC, accessibility is a core element of consumer protection and a longstanding priority across our policy, standardisation, and advocacy work. Through our active participation in European and international standardisation, ANEC has consistently pushed for accessibility requirements to be embedded “by design” in products and services, ensuring that the needs of persons with disabilities and older consumers are addressed from the outset rather than retrofitted later.

In collaboration with the disability movement, we also contributed to EU legislation and strategies, including on the European Accessibility Act, product safety rules, digitalisation, and the built environment, highlighting the links between accessibility, safety, and equal participation in the Single Market¹.

Based on our experience, we call for accessibility to be systematically integrated into all EU product, digital, and market surveillance legislation, with clear, enforceable requirements. We stress the need for stronger and more consistent enforcement of existing accessibility rules, supported by adequate resources, training, and coordination among national authorities.

We also call for binding, harmonised accessibility requirements for the built environment across the EU, rather than reliance on fragmented national rules or voluntary measures. ANEC has consistently argued that inaccessible buildings, public spaces, and transport infrastructure undermine the effectiveness of EU consumer and internal market policies.

In relation to the European Accessibility Act, ANEC strongly supports its objectives as a major step forward in improving accessibility of key products and services in the Single Market. However, ANEC regrets that the scope of the Act does not sufficiently cover the built environment, which limits its overall impact for persons with disabilities and older consumers.

ANEC considers the accessibility of household appliances to be essential for independent living, safety, and equal participation of persons with disabilities and older consumers. ANEC has long argued that many household appliances such as washing machines, ovens, refrigerators, and vacuum cleaners, are still designed without sufficient consideration of diverse user needs, creating barriers related to physical access, controls, displays, sound signals, and instructions for use.

Through our work in European and international standardisation, we promote accessibility-by-design for domestic appliances, calling for clear and measurable requirements on aspects such as reachability, tactile and visual contrast of controls, understandable interfaces, audible and visual feedback, and accessible user information because of the strong link between accessibility and safety, noting that poorly designed interfaces or unreadable displays can increase the risk of misuse,

¹ <https://anec.eu/publications/tagged/accessibility>



accidents, and injuries². However, ANEC stresses that accessibility must go beyond optional features and become a mandatory requirements for putting domestic appliances on the market so that appliances are usable by the widest possible range of consumers.

In ANEC's view, only a comprehensive approach that addresses both accessible products and accessible environments can deliver meaningful and lasting inclusion across the EU.

2 | How to improve accessibility in the current market context

ANEC urges the European Commission to improve data collection, monitoring, and reporting on accessibility outcomes, including the real-life experiences of persons with disabilities as consumers. We support targeted funding, research, and awareness-raising to promote inclusive design and innovation, while ensuring that the costs of accessibility are not shifted onto consumers.

We also think that training authorities and professionals is key. Targeted training for market surveillance authorities, customs, designers, and manufacturers on accessibility requirements should be roll out across Europe.

We believe standards that meets the needs of economic and societal stakeholders can give European business an advantage on the global stage. By strengthening consumer protection, ANEC's collaboration with the disability movement aims at reinforcing the key EU objective to enhance accessibility. The European standardisation system should fully take into account the United Nations Convention on the Rights of Persons with Disabilities. It is therefore important to ensure inclusiveness and effective participation of stakeholders in the actual results of the consensus-building process.

ANEC also works on standards related to guide dogs and assistance dogs, seeing standardisation as a practical tool to improve recognition, quality, and access rights across Europe. ANEC contributes to the development and use of European standards that define clear criteria for the training, welfare, behaviour, and identification of guide dogs and other assistance dogs, helping to build trust among service providers, authorities, and the public.

However, the lack of harmonised EU rules on the recognition and access rights of assistance dogs, leads to legal uncertainty and discrimination, especially in cross-border situations. We support studies on national frameworks on accreditation and certification of assistance dogs and the barriers to the mutual recognition – including by transport operators. The study results should be used to set up a mandatory database for the verification of credentials/accreditations of assistance dogs and the harmonisation of the CEN standard on assistance dogs.

Ends.

² <https://anec.eu/priorities/accesibility>



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

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EC Register of Interest Representatives:
Identification number 507800799-30

BCE 0457.696.181

ANEC is supported financially by the European Union & EFTA

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