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Brussels, February 25<sup>th</sup>, 2013

**For the attention of Mr Johan Ten Geuzendam, Head of Unit  
Mrs Inmaculada Placencia Porrero, Deputy Head of Unit**

Integration of People with Disabilities  
DG for Justice,  
European Commission  
B-1049 Brussels

Dear Madam,  
Dear Sir,

The associations supporting the Survey in attachment would like to contribute to the process of improving the accessibility of people with disabilities and senior citizens in Europe. The Survey on the *“Accessibility of the built environment legislation in Europe”* presents the status of vertical accessibility in the member states, based on the national or regional legislations and national norms if any.

A map assesses the quality of the national legislation in place in each country, from dark green (very good situation – none at present) to red (absence of legislation or unknown situation). It is only a general assessment. Some German Länder for example, still allow the construction of residential buildings of 4 levels without a lift or lifting platform. This is not acceptable in the XXI<sup>st</sup> century and not in line with the UN Convention on the rights of People with Disabilities ratified by the EU and most Member States. Accessibility to transport and housing for people with disabilities and senior citizens is essential for their active inclusion into society. They are an important part of society and the economy that will grow in number and in quality if the environment is designed with their needs in mind (concept of Design for All). The greying of the European population and the increasing number of senior citizens with disabilities but who strongly want to remain in their apartments or “homes” as long as possible, means that the Member States should revisit their legislations and strongly improve the built environment to make it fully accessible to all. It is in everybody’s interest, since the cost of keeping seniors at home, as they actually wish, is much lower than the cost of putting them in institutions, just because of accessibility issues.

May we suggest to the Unit of Rights for people with disabilities, to put this Survey on the European Commission website? We have done so with DG ENTR (Circa website) for our Survey on the situation in terms of Safety for Existing Lifts (SNEL EN 81-80) in Europe. The SNEL Survey is regularly updated on the CIRCA website by all partners involved.

We understand that legislation for the existing stock of buildings is the responsibility of the Member States and not the responsibility of the European Commission. It is actually the same for the safety of existing lifts, but the publication and updating of such documents on European Commission websites is a great incentive for national governments to do something about the issue.

We are of course ready to discuss this with you, hope that the "Accessibility Act" is progressing well and remain in the meantime,

Yours sincerely,



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A handwritten signature in blue ink, appearing to be "S. Sagramola", written over a horizontal line.