The European Deafblind Union
Established October 22, 2003
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URGENT APPEAL / OPEN LETTER

To:
Mr. Janez Jansa, Prime Minister of the Republic of Slovenia
Ms. Mateja Ribic, Minister of Demography, Family and Social Affairs
Government of the Republic of Slovenia
Emails: gp.kpv@gov.si, gp.gs@gov.si, gp.mddsz@gov.si, mateja.ribic@gov.si

Concerning: Urgent Demand to Withdraw the Amendment to the Act on the Use of the Language of Deafblind People (ZUJG-A) and to Respect the Independent Expert Representation of Persons with Deafblindness

Date: 5 November 2026

Dear Prime Minister Jansa, Dear Minister Ribic, Dear Members of the Government,

The European Deafblind Union (EDbU), as the recognized European umbrella organization representing the interests of persons with deafblindness, is writing to you with the utmost urgency on behalf of our longstanding full member, the Slovenian Association of the Deafblind DLAN (Zdruzênje gluhoslepih Slovenije DLAN).

We have been informed that the Government of the Republic of Slovenia is considering a proposed amendment to the Act on the Use of the Language of Deafblind People (ZUJG-A) under a shortened legislative procedure. This amendment aims to postpone the implementation of this historic Act from 1 January 2027 to 1 January 2028.
On behalf of the European deafblind community, we strongly urge the Slovenian Government to immediately withdraw this amendment and to proceed with the full implementation of the Act as of 1 January 2027, in accordance with the legislation unanimously adopted by the National Assembly on 23 October 2025.

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1. Deafblindness is a Distinct Disability: Legal Framework and the Nordic Definition
Deafblindness is not merely a combination of deafness and blindness; it is a distinct, unique disability requiring specialized approaches and highly specific services. This status is recognized internationally, regionally, and nationally:
• The European Parliament Written Declaration 1/2004 of 1 April 2004 formally declared that "deafblindness is a distinct disability that is a combination of both sight and hearing impairments" and asserted that deafblind individuals should enjoy equal rights as EU citizens, enforced by dedicated legislation.
• Article 62a of the Constitution of the Republic of Slovenia sets a global precedent by explicitly recognizing the language of deafblind people in a separate paragraph.
• The UN Convention on the Rights of Persons with Disabilities (CRPD), ratified by Slovenia, protects the fundamental rights to communication and information (Article 21), independent living (Article 19), and active consultation (Article 4(3)).

The Ministry's concerns regarding the potential "thousands" of applicants eligible under the Act are technically flawed. The 2014 European Deafblind Network (EDbN) study citing 9,702 individuals in Slovenia was a population-level epidemiological prevalence estimate based on the Nordic Definition of Deafblindness. The Nordic Definition encompasses all individuals with a dual sensory loss, regardless of their specific communication modalities or functional needs.
Crucially, not all deafblind individuals use or require a deafblind interpreter or interpreter-guide. The entitlement criteria set out in the Slovenian Act are governed by strict medical and functional assessments through the Pension and Disability Insurance Institute and Social Work Centres. DLAN, as the sole expert organization with two decades of direct field experience, estimates that no more than 200 individuals will qualify for these specific services. Using the raw 2014 EDbN statistical estimate to justify a delay is a severe misinterpretation of the data.

2. The Autonomy and Expertise of DLAN vs. Subordination to the Deaf Association
We must firmly address the alarming attempt by the Ministry to subject the national vocational qualification documentation for deafblind interpreters to the review and approval of the Association of Deaf and Hard of Hearing Societies of Slovenia (Zveza drustev gluhih in naglusnih Slovenije - ZDGNS).
The Slovenian Association of the Deafblind DLAN is a fully independent, representative disabled people's organization that has spent twenty years building expert knowledge in deafblindness. The Association of the Deaf (ZDGNS) is an organization specialized exclusively in the needs of deaf and hard of hearing individuals. From a holistic, professional, and expert standpoint, ZDGNS does not possess the specialized methodology, training, or pedagogical background required to assess the field of deafblindness.

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Subjecting the implementation of the language of the deafblind to a deaf organization threatens the structural autonomy of the deafblind community. It directly violates the principles of the Ljubljana Memorandum 2026, which underscores that guiding is an inseparable, integrated part of deafblind interpreting and that deafblind individuals have the absolute right to represent themselves independently. Legal execution concerning deafblindness must never be subordinated to the jurisdiction or veto power of an organization representing a completely different disability group.

3. Serious Violations of Human Rights, Legal Continuity, and Predictability
Postponing the Act and disregarding the year-long consensus achieved by the technical working group (comprising DLAN and TAKTIL) represents a grave breach of legal continuity and predictability (pravna varnost). It denies vulnerable citizens the immediate exercise of rights to basic human interaction, communication, and safety. Furthermore, bypassing DLAN's expertise in favor of an external entity constitutes a direct violation of Article 4(3) of the UN CRPD, which obligates States Parties to closely consult with and actively involve persons with disabilities through their representative organizations.
The proposed delay has already faced unanimous opposition from the National Council's Commission for Social Welfare, the Human Rights Ombudsman, and the Advocate of the Principle of Equality.

Conclusion and Demands
The European Deafblind Union (EDbU), standing in full solidarity with the World Federation of the Deafblind (WFDB), demands that the Government of Slovenia:
1. Withdraw the proposed amendment to postpone the Act and ensure its application starting 1 January 2027.
2. Respect the professional monopoly and expertise of DLAN as the sole legitimate representative partner for the deafblind community in Slovenia, excluding non-specialist associations from oversight.
3. Cease any attempts to reopen finalized technical agreements concerning interpreter qualifications.

Failure to do so will compel us to formally escalate this matter to the relevant European human rights watchdogs and European Union oversight mechanisms.

„Nothing about us without us! Nothing about deafblind people without deafblind people!"

Respectfully yours,

Tamas Gangl
Vice-President, European Deafblind Union (EDbU)
On behalf of the EDbU Presidency and President Thomas De Coninck

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