

Template for comments

Zero draft of the new Regional Implementation Strategy (RIS) for the Madrid International Plan of Action on Ageing (MIPAA) for the UNECE region – “A future for all ages”.

To facilitate the consolidation and review of comments, you are invited to use this template to submit your observations. For each proposed modification, please indicate the relevant section or paragraph, the proposed wording, and the rationale for the suggested change.

Please submit your comments to the UNECE Secretariat at unece.ageing@un.org indicating your country/organization name in the subject line.

Which sector do you represent?

Civil society

Country: European level organisation based in Belgium

Organization: ESO (European Senior Organisation) – PES-seniors www.socialistseniors.eu

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General comments on the draft RIS

Please provide any overarching observations concerning:

- Overall structure
- Strategic priorities
- Missing themes or issues
- Coherence across chapters
- Monitoring and implementation arrangements

ESO (European Senior Organisation) – PES Seniors (www.socialistseniors.eu) welcomes the UNECE initiative to consult civil society regarding its "zero draft" proposal to revise the Regional Implementation Strategy (RIS) for the Madrid International Plan of Action on Ageing (MIPAA) within the UNECE region.

ESO PES Seniors is the European network of older persons' organizations rooted in the broad social-democratic movement; we view the values and principles of democratic socialism as the foundation for our social engagement. Our membership comprises organizations from 11 European countries.

As a member of AGE Platform Europe, ESO fully supports the recommendations submitted by the AGE Platform. These recommendations are grounded in a human rights-based approach to ageing, the fostering of intergenerational solidarity, and a strategy based on age-equality across all generations.

ESO wishes to make three overarching observations regarding the strategy:

1. A key prerequisite for the success of policy strategies is broad societal support; consequently, the involvement of relevant civil society organizations is essential to achieving the intended objectives. ESO is considering civil society — of which we are a part — as a vital link between citizens and politics. Our member organizations are active in society by numerous local branches and initiatives, reaching citizens in their daily lives.

In this context, civil society and its organizations must be recognised as essential partners in the process.

We look forward to UNECE's response to our contribution and these made by civil society organizations, as well as to collaborating with the policymakers from member states who are responsible for approving and implementing the process. It would be beneficial to strengthen this condition of participatory democracy—based on engagement and cooperation with representative civil society organizations—across the various stages of the process, by the conception, implementation, monitoring and evaluation. We also advocate for the recognition and funding of representative civil society organizations that align with the principles upheld by the United Nations and endorse fundamental rights.

2. ESO also highlights the importance of the final chapter (chapter 7) of the draft RIS: implementation and follow-up. A regional implementation strategy hinges on cooperation between politics and civil society, but also between the various levels of governance, ranging from local, regional, and national authorities to European or global institutions and authorities,

ESO advocates for better coordination across governance levels - between local and regional entities and the national level and international level, as well as for seeking greater synergy between the projects and strategies of international institutions. For instance, the WHO's Age-friendly Cities and Communities programme could serve as a valuable tool for implementing programmes within the framework of the RIS.

In addition, there is also need for improved monitoring of policy outcomes. This can be achieved through better data collection and regular reporting by Member States and their regions. To this end, we advocate for the establishment of regional or national contact points—such as a network of regional or national commissioners for the rights of older persons or ombudsman services— which can facilitate follow-up on the strategy's implementation and where affected citizens can turn for assistance regarding issues of access to their rights.

3. Adopting a rights-based approach to ageing and older persons, special attention must be paid to the challenges posed by digitalization; for many older persons—and indeed others—digitalisation constitutes a significant barrier to accessing services to which they are entitled, such as financial services, social allowances and benefits, and a wide range of other services. In this context, ESO advocates for a legally guaranteed right to face-to-face service provisions and calls for a requirement that all service providers should guarantee face-to-face points of contact.

Comments Matrix

To facilitate the consolidation and review of comments, you are invited to use this template to submit your observations. For each proposed modification, please indicate the relevant section or paragraph, the proposed wording, and the rationale for the suggested change.

Paragraph	Proposed change	Rationale / Justification	Nature of comment*	Priority**
Para. 7	Addition at the end of the paragraph : <i>In all measures, special attention must be paid to older people living in poverty, older people living alone, older people with care needs, older people with a migration background, and older people in rural areas.</i>	Various groups are mentioned, but the needs of vulnerable older people could be addressed more explicitly. We therefore call for greater attention to be paid to vulnerable older people. This aligns with the 'leave no one behind' principle and helps prevent inequalities from being overlooked.	S	High
Para 9	1.1 Promote a positive <i>rights-based approach to ageing</i> and realistic understanding of ageing as a diverse, dynamic and malleable process 9. Public perceptions of ageing <i>We commit to shifting the narrative about older persons to a rights-based approach to ageing.</i> We commit to promoting a positive, realistic	The dominant conservative discourse narrows down the view of the “elderly” as mere “care and pension dependent persons.” We need to commit <i>shifting in the narrative about older persons and strives for a rights-based approach to ageing.</i>	S	High

	and evidence-informed understanding of ageing through policies that acknowledge diversity, recognize that age alone does not determine capability, and raise awareness of experiences and inequalities that accumulate across the life course. This includes promoting communication that reflects agency, adaptability and contributions of older persons and the social, economic and technological factors that shape ageing experiences.			
Para. 19	This includes ensuring equitable, non-discriminatory and guaranteed access to public and private services by face-to-face service-provisions ~~analogue and hybrid service options~~ , while providing tailored support for online and AI-enabled services.	Older persons must maintain independent access to public and private services. Digitization may not create a barrier to access to services, income or allocations, and facilities in the context of the enjoyment of fundamental rights.	S	High

Para. 20	Digital inclusion depends on relevant digital skills, strong digital literacy and safe online environments. <i>We commit that individuals must retain the right to human intervention in automated decision-making that affects their access to services, social protection, healthcare, or financial products.</i> We commit to enhancing digital skills and digital literacy among older persons through policies	Protect the older persons against digital exclusion, as well as errors and discrimination caused by algorithms. The proposed strategy focuses all too often on digital literacy, upskilling, and AI, yet user rights have not been sufficiently fleshed out.	S	High
Para. 26	Addition to the text : <i>Participation mechanisms must ensure the structural involvement of representative organizations for older people in the preparation, implementation, monitoring, and evaluation of policies regarding population aging.</i>	[reason for change] see introduction	S	High
Para. 29	Addition at the end of the paragraph : “<i>Civil society</i>	[evidence, national experience, consistency issue, etc.]	S	Medium

	<i>organizations, seniors' associations, and other community-oriented initiatives play an essential role in preventing loneliness, strengthening social cohesion, and supporting active participation, and need to be stimulate and supported by public authority.</i>			
Para. 30	Active participation in community life provides a sense of purpose with benefits for life satisfaction and longevity, yet access remains uneven due to barriers related to accessibility, affordability, discrimination, geography, digital exclusion and unequal access to information and services. <i>We commit to giving particular attention to participation in cultural, recreational, and educational activities that contribute to a sense of</i>	The draft text is highly focused on economics and policy, whereas in reality, it concerns a right for all citizens to lifelong access to culture, recreation, and a sense of purpose. Active aging is about more than just working and receiving care.		

	<i>purpose, well-being, and quality of life.</i> We commit promoting equal access to community life through policies that remove barriers to participation and ensure that all individuals can engage in social, cultural, recreational and civic activities on an equal basis. This includes improving access to information, public spaces and community services promoting inclusive service delivery and ensuring that participation opportunities are responsive to diverse needs, interests, abilities and life course experiences.			
Para. 31	Add a new This entails ensuring <i>affordable, accessible, and frequent public transport as a prerequisite for participation, autonomy, and access to services.</i>	Mobility is addressed in a fragmented manner but deserves a stronger position. Age-friendly mobility is insufficiently addressed, even though it plays an essential role and needs improvement certainly in rural, peripheral, and border areas.	H	
Para. 37	Addition at the end of the paragraph:	S		High

	Particular attention must be paid for the affordability for low-income individuals and to avoiding the avoidance of care for financial reasons.	Access to care is not just a matter of availability. Rising healthcare and care costs are a major concern for many older persons. •		
Para 39	 We commit to support and recognise informal carers, including family carers and other unpaid caregivers, through policies that expand respite and counselling services, provide training and information, and ensure access to social protection. <i>This also includes appropriate societal, financial, and social recognition for informal caregivers.</i> ...	There is a need for structural recognition of informal care.	M	
Para. 44	Add a new sentence: Demographic change places increasing pressure on the sustainability and fairness of social protection systems, with implications for adequacy,	The draft text focuses heavily on the sustainability of pensions, but less on adequacy. We are calling for greater attention to be paid to pension adequacy. Otherwise there is a risk that sustainability is interpreted solely as cost-cutting. A balance between financial viability and dignity is necessary.	H	

	intergenerational balance and long-term fiscal stability. <i>Social protection and pension systems must be not only financially sustainable but also adequate to enable a dignified life and full social participation in old age.</i> At the same time, population ageing presents opportunities for these systems if accompanied by policies that formalize employment and support flexible work and retirement. 			
Para. 54	Addition at the end: <i>We commit for better coordination between local and regional entities and the national level, as well as for seeking greater synergy between the projects and strategies of international institutions, as the WHO's</i>	See introduction	Very High	

	<i>Age-friendly Cities and Communities programme, that could serve as a valuable tool for implementing programmes within the framework of the RIS.</i>			
Para. 56	We commit to reviewing progress in the implementation of this strategy through the periodic five-year review and appraisal cycles of MIPAA and its internationally agreed modalities. <i>These review should be feed by reports from regional or national contact points—such as a network of commissioners for the rights of older persons or ombudsman services—who provide a follow-up on the strategy’s implementation, collect data and concerns from affected citizens.</i> These reviews should support mutual learning, identify policy gaps and emerging challenges, and inform the continuous			

	adaptation and improvement of ageing-related policies and programmes.			
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*Nature of comment:

- **E** = Editorial (grammar, drafting, clarity, consistency)
- **S** = Substantive (policy content, objectives, commitments, indicators)

**Priority levels:

- **High** (important for agreement)
- **Medium**
- **Low** (desirable improvement)