Hello, everybody,

and welcome to this webinar

on the European Accessibility Act,

being organized today

by the European Disability Forum.

I hope that everybody is well.

I hope that you can hear me clearly,

despite some technical issues.

And I thank you all very much

for attending.

We'll talk about the adoption process

of the Act at national level

and how persons with disabilities

can influence this process to make

the Act even stronger

in national laws.

Before I introduce

the content of our webinar

and today's speakers

I'd like to share with you

some logistical information

and housekeeping rules

for how this webinar will work.

The first thing I want to tell you is

that the link to access

the real-time captioning is

in the Chat box.

The Chat box should be located

on the right of your computer screen.

As you'll have already noticed,

we also have

interpretation

in international sign language.

You can also find

the relevant materials for today

including all of today's slides

in the Handout section of the platform.

This is also located

near to the Chat box.

Also all participants have

muted microphones,

and EDF is controlling permission

to mute and unmute.

If you're trying to unmute yourself

and you can't

don't worry, this is

absolutely normal.

In case you face

any technical issues,

you can write to our colleague,

Raquel through the Chat box.

The Chat box is also located

on the right of the screen.

We invite you to ask questions

throughout the webinar.

You can do this using

the Question box.

Please, indicate the speaker to whom

you'd like to ask your question,

so that we make sure the right person

is answering your inquiry.

The webinar is being recorded

and it'll be available

on the EDF website

in the coming weeks.

We'll also make available

the material from today,

such as the slides

or any other resources or links.

Before we start, I want to begin

by thanking our interpreters today,

Gerdinand and Lisa,

and our live captioner Kimberly.

Thank you for our speakers

for taking the time to be with us,

and of course, all of you

for being with us.

My name is Haydn Hammersley,

I'm is Social Policy Officer at EDF

and for today, I'll also be

the moderator of this webinar.

So, as mentioned

we'll be discussing

the transposition process

of the Accessibility Act

by the EU Member States.

Firstly what we'll do is

have an overview of the act,

followed by some recommendations

on how to strengthen the act

at national level.

We'll also hear about the experience

of EDF's Swedish member organization

in engaging in negotiations

during the transposition in Sweden.

We made sure to allocate some time

for questions for each speaker

after they've spoken, and then, again

at the very end of the webinar,

if you had questions you forgot

to ask the first time round.

Now without any further ado,

I'm going to introduce our speakers.

Our first speaker will be

Inmaculada Placencia Porrero,

who's the senior expert at unit C3

at Disability and Inclusion

at the European Commission

DG EMPL.

Our second speaker you'll know

him very well, it's Alejandro Moledo,

who is EDF's Policy Coordinator.

And then, thirdly, we have

our speaker from Sweden,

who is Mia Ahlgren from the Swedish

Disability Rights Federation.

I'm sure you're very keen

to hear what the speakers have to say,

but before, just say a few words

about the European Disability Forum.

So the European disability forum,

also known as EDF for short.

It’s an umbrella organization

representing

more than 100 million persons

with disabilities in the EU.

We advocate for the full implementation

of the UN Convention

on the Rights of Persons

with Disabilities (CRPD)in the EU.

And the motto of our organization is

"Nothing about us without us".

Now on the top left-hand side

of your screen

I'm not sure if it's visible,

but we are showing a photo

of our Executive Committee.

I'm not sure if it's visible.

And with that short introduction,

We'll move on to our first speaker,

who is Inmaculada Placencia Porrero,

Senior expert from the EU Commission

who will give an overview

of European Accessibility Act.

So Inma,

I'll hand over to you. Thank you.

INMACULADA: Hello, can you hear me?

HAYDN: We can hear you perfectly.

INMACULADA: Yes, I don't see

my slides on the screen.

I clicked already on the show my screen,

but I don't have…

RAQUEL: We can see them,

just put it in full screen mode, please.

We can see them perfectly.

INMACULADA: You can see them

perfectly?

RAQUEL: Now you just need

to put it full screen mode.

INMACULADA: I do it immediately.

Thank you very much, perfect.

So, let me start by thanking EDF

for organizing this seminar

on the European Accessibility Act

to better understand

what is the content of the act.

In this critical moment where we are

in the transposition process.

It's very important

that transposition happens correctly.

And all stakeholders have

an important role to play here.

With my presentation

I'm going to try to give you

a general overview

of what the content of the act is.

I'll try not to give an opinion.

I know this is coming later,

the EDF speakers will provide

the views

of what is the views

on the content of the act.

It's not that I don't have my opinion

but it's not my role here.

For me it's really a pleasure

to be able to present it,

it has been many years

working on this.

So I hope by the end, you'll have

a better understanding of its content.

We started working on the act

in 2010 with the idea,

a general idea to improve

Accessibility in the EU.

And to adopt, to see whether there was

merit in adopting regulatory measures.

The reason behind was that,

there were different approaches

on Accessibility to the EU.

There was different scope

of the different national legislation.

Some legislation was at national

and regional level.

And the level of detail was different.

So just difficult to address

accessibility at European level

without having a common understanding.

This directive comes into an ecosystem

of accessibility already,

Accessibility legislation

that existed already in the EU.

There were some pieces

in different areas.

And what we tried to do

with the act is craft a system

that would complement,

bring coherence

and complete certain elements

that were not covered

by legislation on Accessibility

at the EU level until then.

So, what is the content of the act?

The act contains two main legs.

On the first one, we have

Accessibility requirements

for a number of products

and services.

I'll explain in the presentation

what are those requirements

and how the directive puts obligations

on the different actors there.

And it has a second leg, which is using

those accessibility requirements

for other EU law that contains

already accessibility obligations.

I'll also explain

a little bit further later.

To start with, look into the scope.

It has got a very strong...

I'd say ICT component.

And, it's divided basically

in first, products

and the list of products is

computer hardware and operating systems.

Self-service terminals and under this

we have all payment terminals.

And a number of self-service terminals

that are dedicated

to the provision of the services

covered in the directive.

And that is ATMs, ticketing machines,

check-in machines,

and interactive self-service terminals

that provide information.

The exception is the machines installed

as an integrated part of the vehicles

or vehicles in transport,

then they'd be excluded.

Consumer terminal equipment

with interactive computer capability

used

for electronic communication services.

Those are telephones, mobile phones,

terminals or equipment that allow you

to have communication services,

electronic communication services.

And then, consumer terminal equipment,

that allows you

to access

audiovisual media services.

Here we talk about TVs,

and all of the devices,

that are allowing you to connect

TV, set up boxes, screens, etc.

Finally e-readers.

In relation to services, we have got

electronic communication services

except machine to machine services.

This was taken away by The Commission

during negotiations.

Then we have access

to audiovisual media services.

This also has changed

during the negotiations.

At the beginning the Commission

proposed audiovisual media services

But this is covered,

so we decided to put it back

in the audiovisual media

services directive.

Here we have the services providing

access to the audiovisual media services

and certain elements of transport.

In relation to the four modes

of transport,

air, bus, rail and waterborne

passenger transportation services.

We have Accessibility requirements

mobile device based services.

Mobile device based service is

any service provided in a mobile device.

Also, Electronic tickets and ticketing,

transport information, websites,

also real-time information

and self-service terminals.

There is a limitation for urban,

suburban and regional transport services

where only the self-service terminals

are conceived.

This was also introduced

after the Commission proposal.

Then we have got

consumer banking services,

eBook and dedicated software

and eCommerce services.

The eCommerce services

will be also explained a bit later.

We've now dealt with two elements

of the scope, products and services

Other element is the answering

emergency communications to 112.

Here basically is those organizations

that pick up the phone when you call 112

we have to answer also

in an accessible way.

Following the same modes

that is being received.

Then we have also

the built environment,

and it's optional in the sense

the Member States decide

whether they want to make

the built environment

where the services in the scope

of the directive provided accessible

following the accessibility requirements

of the act.

And then we’ve got in the scope

what I call

the second leg of the directive

which is the public procurement

and other EU acts like for example

the Structural Funds.

Here, in the directive

for public procurement is required

to basically buy accessible.

It doesn't say what accessible is.

The Act says

what is accessible meant.

For products and services

in the scope of the act,

those accessibility requirements

are compulsory for others,

the requirements of the act

provide presumption of compliance.

In other words,

let me give you an example.

If you buy a telephone

as a public authority

using public procurement,

then the requirements are compulsory.

But if you buy a printer,

for example, well,

if you use the requirements

of the act

for the user interface of that printer,

you'll be presumed to be accessible.

Similarly for the Structural Funds

when EU money is spent

to buy products and services,

then the same applies

about presumption of compliance.

I'll go now to the key provisions.

The first one is common

for products and for services:

the accessibility obligation grant

free movement

of products and services that meets

the accessibility requirements.

They don't have restrictions

in the internal market

due to accessibility.

Then the directive contains

a number of specific obligations

for manufacturers, distributors

authorized representatives and importers.

Remember we're talking about products,

it's based in d decision 768/2008,

This is a decision which describes

how product related regulations

in the internal markets

should be described or written.

The directive follows the decision

with adaptations as for accessibility.

For products it's also required

that once they comply

with the accessibility requirements,

the manufacturer can put

the CE marking, in accordance

with regulations 765/2008.

This regulation is now being updated

and, of course,

provisions of the new regulation apply.

Then we've got a starting

into the conformity,

and the enforcement of the proposal.

And the directive has a process,

I'll tell you later in more detail,

but basically we have self-declaration,

it's the first point

for the conformity assessment,

so basically

economic operators have to declare

that they conform with the directive.

Then we have other elements

that makes the enforcement strong.

Market surveillance.

The directive requires the creation

of a market surveillance authority,

addressing identification

of market surveillance authority

to check compliance

with the safeguards

that are put in the directive.

In relation to services,

the requirements are

the obligations in the directive

inspire those of products.

We've got also

accessibility obligations,

the free movement is granted

when the service comply with it.

And it sets a number of obligations

for service providers

that they have to continue ensuring,

for example,

the compliance

with the accessibility requirements.

And it creates a figure called authority

responsible for compliance of services.

It's, let's say, kind of equivalent

for market surveillance, for products

because they have the role of checking

the compliance of the services

with the obligations of the directive,

and the application of the safeguards.

But is different in the sense

that the regulation that applies

for the market surveillance dugs

not apply here.

Other issues.

Some exceptions,

that were introduced also

in the negotiations and those are:

micro enterprises that provide services

are exempted.

This means they do not have to fulfil

the obligations of the directive.

Then we have the mitigating measures

for micro enterprises for products

to reduce administrative burdens

and for Member States to provide guidance

We have two safeguards

in the directive.

One is called disproportionate burden,

basically is

to address economic operators

to have to apply

the Accessibility requirements

of the act to the extend

that they don't impose

a disproportionate burden.

There is annex that describes

how this can be assessed.

The second safeguard is

the fundamental alteration.

This means that the application

of Accessibility requirements

it must be done to the extent

that it doesn't fundamental repair

the nature of the product

or the service itself.

One example would be,

and I always give the same example,

if you are a manufacturer

of miniature phones,

nobody can ask you to make a big phone

with big buttons or big screen.

You'll still be able to produce

miniature phones.

However, you'd be able to comply

with other Accessibility requirements

that make your miniature phone

accessible.

The directive allows to adopt

standards and technical specifications

to provide presumption of conformity.

The first option is to have these

in written and there are some obligations

That is to issue a mandate

for products,

and to the European

standardisation organisations

That would lead to harmonized standard.

However if those aren't available

or there is a due delay,

the Commission may adopt

technical specifications

as implementing acts,

so an alternative

to standards so that,

if more detail is required

on the Accessibility requirements,

we're able to provide them

through standards or an alternative.

In addition, the act allows to adopt

through delegated acts,

binding technical specifications,

for example, interoperability,

as harmonized standard

for interoperability

it'd be in this context voluntary

providing presumption of conformity

but they are not mandatory.

If we see or the field sees

that it doesn't work.

It's possible to adopt

a delegated act

with interoperability requirements

so that would be binding

so that interoperability

would become a reality.

And the directive also allows

the use of those harmonized standards

and technical specifications

in the context of other Union acts.

In procurement and for example

in the structure of apps.

In this slide there is some of the work

we've being doing

in standardisation in the last years.

This is just an illustration

because this standards were done

under other existing mandates,

Accessibility and ICT,

and to be able to use the standard

that came out of that process.

EN 301 549 we need to have

a new mandate

and go

through the harmonization process.

We have the obligation

to do that for products,

not for services

and we're working on that.

Of course, in the Commission

we don't want to reinvent the wheel

in the sense that if elements

of this standard can be used

of course we'll try to do so.

In the area of the Built environment

we wrote the Mandate 420

and we're about to have

a standard,

there is a draft standard already,

it's going to go for the vote soon,

so probably before the end of the year

we'll have the first European standard

in the Built environment

that would be also useful

for public procurement,

but could be used in the other context.

Finally mandate 473, which contains

two key elements and one is

developing a methodology

the standardisation organizations,

they'd include

accessibility following design for all

when they do standards

in whatever area.

There is a protocol to that,

it's important use it.

And finally, to develop a standard

that address the process,

that provides the process

that follows a design for all approach

so that the result

would be accessible.

In other words,

it addresses how manufacturing

or service delivery process,

what they need to do,

how they can organize themselves,

consult users, address training

and many other issues

so that the products,

the services, the outcomes

are accessible. That is EN 17161.

This standard can also be used

in the public procurement.

But this is just an illustration,

if you want know what is accessibility,

because the act hasn't yet linked

with these by harmonization process.

That's still to come.

In the next slide, I have

basically Article 28,

which requires

the creation of a working coup

with the participation

of market surveillance authorities,

responsible for relevant stakeholders

and compliance of services.

It identifies the representatives

of disability organizations.

And the relevant stakeholders,

other economic operators

and public authorities

could be involved.

The task is to exchange

information and best practices,

cooperation on implementation

to improve coherence

and monitoring safeguards

and advise the Commission

in the Accessibility obligations

article and 4

and safeguards

which are in article 14.

Now, I said I'd go back

to the enforcement and penalties.

And as I said,

the starting of the enforcement is

the declaration of conformity

by the economic operator.

The self-declaration of conformity.

This is the first point.

There is an obligation for Member States

to ensure the means for compliance

and we also have in the directive

the market surveillance authorities

which are authorities that have

to check compliance of services,

the obligation also to check,

and to receive address complaints

if they received them.

Finally, we have in the directive,

the possibility for consumers

to take action before the court.

This applies to everything

except public procurement.

This possibility is also taken away

from commission proposals.

So, consumers can go to court

or take action before the court,

private associations or public bodies

with legitimate interest can do it too.

The directive refers to effective,

proportionate and dissuasive penalties

It refers also

to effective remedial actions.

This is very important:

the intention is not to sanction,

the main purpose should be also

to make sure that compliance is there

and if there is a problem of compliance

with accessibility requirements,

that those are remedied so that

the Accessibility is a reality.

Also, in the recital there is reference

to conciliation procedures,

that might be an interesting thing

to look at.

So, we have a number of annexes.

I'm not going to enter into details

but let me highlight

that in annex 1

we have

all the Accessibility requirements.

For products and for services.

Some are for all products,

some are for all services, some are

specific for particular products

or for particular services.

There is also a section

of functional performance criteria.

I'll try to say a few words later.

Then we have annex 2

with examples.

Those examples are not compulsory,

they're just illustrating,

neither are they exhaustive to fulfil

the Accessibility requirements.

It's just to clarify, provide

some information,

but what is compulsory is the compliance

with all the requirements

the applicable requirements

in annex 1.

Annex 3 is about the requirements

of the Built environment.

the conformity assessment of products,

the information on services meeting

Accessibility requirements

and they refer to relevant documentation

for these declarations.

Annex 6 contains a way or indications

of how to assess

disproportionate burden.

It is possible to further elaborate

on the requirement of those annex

in that annex, but in this moment,

there is no action being taken

in that direction.

I won't repeat what I said

about Accessibility requirements,

but I'll comment about

the functional performance criteria.

Especially as this issue is different

from the functional performance criteria

that are in the EN

that we mentioned before,

remember, I'm going back,

EN 301 549.

They are functional performance statements

that relates to user needs.

These are criteria that relate

to characteristics and functions

of products or services,

this is the first key thing.

And they can be use in the two ways:

as alternative to technical requirements

when you have other functions

of design on production

of products and services,

there is an obligation,

you have to comply

with the functional requirement,

and you have to be sure

that the result is equivalent

or increased accessibility.

It's meant to address situations

in which,

for example, a technical requirement,

it was claimed sometimes,

stop innovation or having

some technical difficulties

then, okay, it's possible to have

in Accessibility functional requirement.

Not to comply

with the technical requirements,

but the functional requirement

remains,

And the functional performance criteria

should lead to equivalent

or increased level of accessibility.

It shouldn't be seen as a way

of escaping the requirements,

it's demanding because it concerns

the design of products and services.

To finish, I'll come into the timeline

for implementation.

We have three years of transposition

since the entry into force.

It was last year, so more or less

half way the process of transposition.

There is a total of six years,

so three additional years

from the end of the transposition period

to entering into force.

So economic operators will have

to apply the requirements.

And, of course, also, public sector,

when they behave as economic operators

or implement funds

or using public procurement directives.

We have

a couple of transition periods.

Transition periods that include

five years for provide services...

...services with the products in use

or a service using some products

Then you have five years extra

to continue using those products.

For self-service terminals

it's 20 years

but not 20 years from the adoption

or application date of the directive.

From the date the self-service terminal

entered into use.

In other words if the terminal

was 19 years

when the directive was adopted,

then they only have one year left

to change it afterwards.

If all the self-service terminals

were bought the day before application

then the maximum of 20 years

could apply.

But being realistic

that will never be the case I hope.

Contract services that are going,

they have a maximum of five extra years.

In answering

the emergency communications,

the directive provides two years,

there are recitals

but the relay remains

for an extra period of two years.

The fact what the technology needs

to be mature is an explanation

but there is two years

to fulfil this obligation.

Then we have a report

five years after.

I mentioned at the beginning

we've developed

in the EU a very complete ecosystem

of ICT Accessibility legislation

I mentioned some of the legal acts,

but just to say

that we have

the Electronic Communication Code,

the Audiovisual Media Service Directive

(AVMSD) that the Act is complimenting

and working very closely together.

The Web Accessibility Directive

that is addressing websites

of public sector bodies

and mobile apps.

In there we use

the same accessibility requirements

that the Accessibility Directive

but we address the private

basically the economic operators

and you can say

that most private sectors,

the eCommerce sectors

websites providing eCommerce are

in the scope of the directive.

And, I mentioned already

public procurement, funds,

European networks, all these contain

already some accessibility requirements.

So, this is what I wanted to present.

I thank you for your attention.

The last slide, there is a listing

of the different versions

of the Commission proposal

to the Council and Parliament text

and some others,

the final text of the directive

and some links

to these other EU law.

Thank you for your attention.

HAYDN: Thank you for this complete

and detailed overview of the Act.

So, we've been asking the participants

to send in their questions.

If you haven't yet had the chance

to send your question for Inma

you can still do so and we'll ask

more questions at the end.

But we already have

some questions for you, Inma,

if you agree to answer now,

some of them are short and technical,

and some are a bit longer.

The first question we have for you

is simply

is public transport itself

not covered?

INMACULADA: Public transport,

all kinds of transport is covered

as long as it's considered a service.

What this cover are

certain elements of the transport.

The act compliments other EU legislation

on passenger rights.

For example some obligations already

it compliments

the technical specifications

for interoperability of rail

and what it doesn't cover is

vehicles and for several reasons,

rail is covered by the TSIs.

There is no EU legislation

when the directive was adopted

on the accessibility of airplanes.

Let's not forget, sorry to extend

myself a bit in the answer,

that this directive has

a legal base on internal market.

The first thing we need to do

to determine the scope is

to identify that there is

divergent legislation

that creates barriers

in internal market.

There is no other legislation

at national level regulating airplanes.

There is national agreement

containing accessibility requirements

for ships and vessels and...

For bus there is already

European legislation on passengers

with more than 8 places,

I think it's called.

I could give you the number to regulate

the accessibility of vehicles.

Thank you.

HAYDN: I hope

that answers the question.

We'll ask one more question

before to handover to the next speaker.

We have another question for you

which is

could Inma tell us

more about the working group

to be set up by The Commission?

When would this be,

and when should a DPO come forward

to express interest to participate?

INMACULADA: Now is the transposition,

now is not the moment.

It'd be before the application.

Before the application will reach out

to stakeholders

in order to conform the group.

But it'll take still

a couple of years.

HAYDN: Perfect, thank you

for your answer.

For those people

that sent in questions,

we'll try to answer them

at the end of the webinar.

If not, as we always do, we'll provide

the answers later in writing.

If you have technical problems,

don't hesitate to write in the chat box

and my colleague will help you.

If you wanted to check out

any of the links

and resources that were

in Inma’s presentation

you can find the Power Point

in the Handouts tab,

which is also next to the Chat box.

That could be very useful.

Okay, very good.

We'll now move on to our next speaker

who many of you know very well

because he works

for the European Disability Forum,

I'm talking about Alejandro Moledo,

who is our policy coordinator,

and he'll give some recommendations

on advancing

the act during national adoption.

So Alejandro,

I'll hand over to you.

ALEJADRO: Thank you.

Do you hear me well, right?

HAYDN: Yes, very well.

ALEJANDRO: Great, let me just get

my slides on.

Okay, I'll connect my webcam

during the questions period.

In this presentation, I'd like

to just give you some tips,

some ideas that we come

by in the EDF Toolkit

on the transposition

of the Accessibility Act

in which we explained most

of what Inma has just mentioned.

And we also provide tips

and recommendations for organizations

representing persons with disabilities

to engage in discussions nationally

to ensure that this directive

will be correctly transposed.

Meaning adopted at national level.

So in this presentation,

I'll be giving you some hints

on how to go

beyond the Accessibility Act,

what Inma just explained,

and to ensure

an effective application of the act.

And to do so, it's very important

to make contacts and allies

with other Civil Society organizations

and with other movements to ensure

that the result is beneficial

to all society.

Finally some thoughts

about things to do as soon as possible.

So, how to go

beyond the Accessibility Act?

As we just heard the scope is large.

It's complex, but there are some room

for manoeuvring at passionate level,

where DPOs, organizations representing

persons with disabilities can try

to improve the national situation

taking as an excuse, if I may,

the transposition

of the Accessibility Act.

So we focus very much in our toolkit

on the scope of this directive.

Obviously we encourage our members

and any organization

working on

the Accessibility Act transposition

on pushing for further accessibility

in all transport services.

As Inma explained, we know

that the Act covers certain areas,

or certain components

of the transport services.

Others are covered

by other European legislation.

For instance, websites

and mobile apps of public transport.

Those will be covered

by the Web Accessibility Directive.

But, to be sure, we need to assess,

at national level,

which are the elements

that are missing

and take advantage of the elements

provided by the Accessibility Act

and those that need

further elaboration at national level.

Another point

in which we can expand the scope

of the Accessibility Act is

banking services.

Because as it's explained

in the Accessibility Act,

this directive covers

consumer banking services,

and therefore we can expand

the definition at national level

to ensure that other banking services

are also covered,

and persons with disabilities

can work in the financial sector too.

During the negotiations

about the Accessibility Act

we received and we called the Parliament

and the Council to include

other products and services

of our everyday lives

which are not accessible to us

such as household appliances,

such as washing machines,

dishwashers or refrigerators.

In this case we need to bear in mind

the accessibility requirements

included in the act, in the directive.

And if we look at Annex I, sorry,

the accessibility requirements

in Annex I,

we can take some elements

in which the Accessibility Act can have

an added value at national level.

If we manage convince

our national government to include,

for instance, smart household products

or these kind of refrigerators

or washing machines that you can control

through a user interface

that can be mobile App or can be

touch screen and so forth.

The Accessibility Act gives us

requirements that can be useful

to make those services, sorry,

those products accessible.

Same goes for other aspects

of the products such as information,

other information provided

in the package of the product.

We always need to bear in mind

the possibilities

that the accessibility requirements

would give us.

And if we need further requirements,

then it's a matter of proposing also

accessibility requirements

in the national legislation.

On emergency numbers,

and this is very important.

As Disability movement

we've been calling for the accessibility

of the European emergency number

for many years.

Even in the current framework is not yet

a reality for persons with disabilities.

The Accessibility Act will give us

finally the accessibility means

to contact 112,

the European number 112.

But what about the national numbers?

Here's when the Disability organizations

at national level need to make sure

that the important emergency numbers

at national level will also be included

in the national legislation.

Obviously, another important point

is micro enterprises.

Micro enterprises providing services

aren't included in the directive.

We can argue

to our national governments

that micro enterprises

delivering services,

which are many in the European economies

need to be included.

We have safeguards in the legislation

including disproportionate burden

or fundamental alteration

so there are reasons to make sure

or to propose

to national governments

that micro enterprises for services

need to be included.

Another aspect

that we stress in our toolkit

and I highly recommend you

to read it carefully is

to try to shorten some deadlines.

Some deadlines of key services

such those we were just talking about.

Emergency number 112,

which deadline is for 2027

with those two extra years

that Inma has told.

We need to ensure that our governments

work as soon as possible on ensuring

emergency numbers are accessible

for persons with disabilities.

This is a matter of emergency.

Obviously deadlines such as the one

for self-service terminals,

as Inma explained

when these are...

when they enter into use,

not into force of the directive.

But when these terminals first put

on the market, we also must encourage

national governments to renew

key self-service terminals,

particularly those related

to public services.

And very importantly, and this

has been point of confrontation

during the negotiation

of the Accessibility Act.

It's not an exclusion

but the voluntary aspects

of the built environment

in the Accessibility Act.

We believe that the transposition

of the Accessibility Act is

the perfect excuse or reason to call

our national governments

to review all those building standards

at national level

dealing with accessibility,

take the advantage

of the accessibility requirements

in the Accessibility Act

and the European standard I'll mention

in a moment and that Inma already did,

to update

those national technical requirements

for the accessibility

of the built environment,

And on this point, sorry,

I'd just like to stress

that the impossibility of including

the built environment was mainly

due to the rejection

by our national governments.

So, it was basically the Council

who rejected the inclusion

of the built environment

in the Accessibility Act.

I had to say that because we suffered

a lot with this provision.

So, obviously, we believe

that many of our members will receive

many questions

on how this works in practice.

And this is why it's important

to draw their attention

to the existing standards

that Inma already mentioned,

the accessibility, the standard

on accessible technologies EN 301 549.

The last version, 3.1,

which is the most updated one.

We hope to have the European standard

on Accessibility

for the built environment soon,

that can, again, be a way to ensure

that technical specifications

and standards for buildings are updated

and they are comprehensively

including accessibility,

accessibility requirements

and then the European standard

on Accessibility following

a design for all,

which is useful for any organization,

for any company

even a public authority or NGO

to ensure

that their processes, internally,

will result

in greater accessibility

for everybody

and will therefore extend

the range of users they can address.

There are other standards,

that are already available out there.

This is the case for eBooks,

the standard for eBooks

called ePub3 already includes

accessibility requirements on it,

so there is no need to reinvent

the wheel and we can refer to this.

So while we wait for the standards

to demonstrate

compliance with the Accessibility Act,

we can reference these standards.

And something we stress

when we talk about standardization is

we need more organizations

of persons with disabilities involved

in standardization, which is

very much lead by industry

therefore we need to be more

and strong in ensuring

those standards

that will demonstrate compliance

with the legislation

will be actually ambitious

and fulfilling the requirements

that are mandatory of the directive.

So, quickly, as I mentioned

at the beginning,

it's important to build alliances

with other Civil Society organizations.

Obviously with government to ensure

an ambitious transposition of the Act.

The Accessibility Act, as you've seen,

covers many areas,

it covers transport, ICT,

public procurement.

So it may be difficult at first

to identify

which is the ministry in charge

of the Accessibility Act.

So we give you some recommendations,

obviously, another one could be

reach out to the CRPD focal point

at national level.

And then get support from members

of Parliament at national level

to back up your positions

and to help you identify

who is the responsible person

at national level

for the transposition

of this legislation.

In terms of how to build up

alliances,

obviously the Disability movement

should come together

to agree on a common strategy

on the points

that the act could be improved

at national level,

but it'd be also equally important

to really reach out

consumer organizations,

because it's a matter of consumers too

to organizations representing

older people,

and organisations representing

consumers in standardization.

So from EDF, we can help you

to find out this

and to find members at national level

of organisations

with whom we work very closely.

And obviously, I forgot to mention,

Human Rights networks, equality bodies

that can also support

and give you munition to your positions

another national level.

The final thoughts I'd like to make is

we need to act as soon as possible.

The transposition, and particularly

in this troubled times

it takes longer than what is stated

in the official journal of the EU

but we shouldn't wait

until the last moment.

As the responsible entities for applying

and implementing accessibility

they shouldn't wait

until the last moment of the deadline

to make their products and services

accessible.

We need to act now,

as soon as possible.

We need to raise awareness

to the general public

about this legislation,

this important piece of legislation

for which we've been campaigning

for years.

And how this plays out

with other relevant legislation

on Audiovisual Media, telecommunications,

web accessibility for the public sector,

on the use of EU funds

or public procurement.

It's important to make the puzzle

understandable for the general public

because otherwise this ecosystem

won't be completed

and with accessibility in mind,

we need to make sure from end to end

that the service, the delivery

and the use of the product

it's accessible

to persons with disabilities.

In this sense we can offer

our support

to the economic operators

or the companies

that will be implementing accessibility

and public administrations

to ensure they fully understand

what this means for us.

As you've heard, all the links

will be available

of the Handout section

of this presentation.

You'll have the links

to all the toolkits and webinars

that we were preparing at EDF for you.

Don't hesitate to check out this.

And let us know

if there is any doubt.

Thank you very much.

Back to you, Haydn.

HAYDN: Thank you very much,

I'm not going to let you leave just yet.

We have some questions for you

so please stick around.

ALEJANDRO: I'll put my camera then.

HAYDN: Okay, we have two questions.

The first question is,

do we already have some examples

where Member States aim to go

beyond the scope of the Act?

ALEJANDRO: If we do have examples?

HAYDN: Uhhum. Indeed.

ALEJANDRO: No, we don't have much new

on countries

aiming at going beyond

the Accessibility Act.

We haven't heard that many countries

are advancing on transposition.

Maybe Inma can give us

more information about this.

HAYDN: Inma, maybe you have

some information or maybe you don't.

INMACULADA: No Member States

have finished transposition period.

It's impossible to say

whether they’ve extended

the scope of the Act,

if that's what you're asking.

I cannot enter into the detail

on the state of transposition

with Member States, it's very diverse.

Some are already writing legislation.

Some of them are thinking

about the organization, the legislation.

But some of them are pretty advanced,

but I cannot disclose at the moment.

I'm sorry. I hope you understand.

HAYDN: We understand.

ALEJANDRO: This is why we need to act

as soon as possible.

INMACULADA: Indeed.

I think it's important

that at the European level

we've had good contacts with DPOs

in order to discuss

the content of the Act.

It's good to do that at national level

and to establish a dialogue

on the implementation of the act.

We'll continue doing so

for the working group

on the directive.

And the standards.

HAYDN: Thank you.

Alejandro, another question for you.

Could you provide an example

of what it would mean

for household products

to be accessible?

Which ones are not accessible now?

How can European Accessibility Act help?

So this is a very big question.

A few words to say on this?

ALEJANDRO: It's a complex question

because it depends

on what household appliance

we're talking about.

And we've seen that there now

and then some products

which are improving in accessibility

for persons with disabilities.

There are examples

of inaccessible household appliances

in almost every kitchen.

From microwaves to washing machines.

I myself with low vision

find very difficult sometimes

to operate some of these appliances.

So the Accessibility Act

can provide, as I mentioned before,

some accessibility requirements

that can be useful to make

these products more accessible.

For example in Annex I

of the Accessibility Act, as Inma said,

some general requirements for products

for example requirements

on how to make information

about the instructions

of the product accessible.

The information on the package.

And then, if question think of...

of this new household appliances

which we have touch screens,

in which we have the possibility

to control them by a website or an app

making that website or that app

accessible would be much easier.

There would be, obviously,

other accessibility requirements

that can be useful

for the machine itself.

So how to make perceivable

a button on a machine

so it needs to be tactile, for example,

or with a sufficient font size

for people with low vision

to read it properly.

It needs to be easy to understand.

All of these need to be reviewed.

It needs to be addressed for it.

Specific product,

but I believe that the act gives us

material to work

on ensuring the accessibility

of this household appliances.

To a certain extent, obviously.

HAYDN: Thank you

for those clarifications.

Before letting you go,

we received in more question.

Since I have you with me now

I0ll ask you. It says:

is a book in PDF considered

to be an eBook

according

to the European Accessibility Act?

ALEJANDRO: That's a good question.

Well, I'm assuming

that the book in PDF is

an accessible PDF,

because sometimes it's very difficult

to find an accessible PDF document.

So, I believe that the ePub format,

the format for eBook,

it allows for way more functionalities

and navigation

and... perceivability

of the book itself,

because you can enlarge

the font, you can change the font,

you can enlarge or adapt

to your needs the space between lines.

You can move around headings

and the elements of the document,

because in a way a good accessible eBook

would be in a way similar

to good accessible webpage.

So the functionalities that allow,

in terms of personalization and so forth

are much greater than in accessible PDF.

Sorry for PDF but I believe

when we developed the requirements

that are in Annex I

of the Accessibility Act

the result will be the ePub 3 standard

is the way to go.

Inma, I don't know

if you want to compliment on this.

INMACULADA: The answer is

if they fulfil the definition, they are.

They are dedicated eBooks

and dedicated service,

the provision of digital files,

if it's a digital file

that conveys the electronic version

of a book that can be accessed,

navigated, and the software

including the mobile device service,

including the applications

that are used for navigation.

So if you have the eBook,

that is in electronic format,

in electronic file, then it's an eBook

in accordance to this definition.

So I'd say, that at first sight,

although the Commission is not here

to interpret EU law,

but try to explain it informally

I'd say first sight

when you read the definition,

the answer would be yes.

HAYDN: Okay, very good.

Very clear answers to the questions.

Don't hesitate to keep sending in

in the questions,

for either Alejandro or Inma

that you hadn't thought of before,

we'll hopefully have time at the end.

Thank you, Alejandro. I'll let you go.

Without further ado

we'll move on to our final speaker

who is our colleague

from Sweden, Mia Alghren,

who is from the EDF member

the Swedish Disability Rights Federation

and who has been active

in adaptation negotiation in Sweden.

Mia is with us today to share

some of her experience with us.

Mia, if you're there,

I'll hand straight over to you.

MIA: Hello everybody, I'm Mia Ahlgren.

I work as a Policy Officer

at the Swedish

Disability Rights Federation.

I'd like to start by saying

that sometimes,

Sweden pretends to be

a model country for everything.

I don't think we're a model country

always for transposition

and enforcement of legislation,

but at least the Disability NGOs

they're involved

in this transposition in Sweden.

So that makes it possible for me

to share the experiences

so far in the transposition process.

And I hope that we can learn

and help out each other in this process.

There you can see me as well,

I have blond hair, glasses,

and I smile a lot, and I'm standing

outside my house, I work from home.

So first of all, I'd like to say

that I suppose transposition processes

look very different

in different Member States.

In Sweden I'll take two examples

of how it can work.

So the Web Accessibility Directive,

the transposition was prepared

by a policy legal officer

within the Ministry of Finance.

The European Accessibility Act,

the government appointed a committee,

Since April it's under the responsibility

of the Ministry of Social Affairs

There's a Rapporteur

and there are three secretaries.

And this Committee is supposed

to have ready proposal in May 2021.

And then that goes out for consultation

and they prepare a bill

and it has to go

through Parliament, etc.

So in Sweden when there is

a Committee like this,

it's very normal

for a legal process.

The government decides kind

of terms of reference for the Committee,

and instructions on the scope

and what issues they want address.

And that is already done in April.

I've put a link to the text in Swedish.

You can use Google translate

to see what that could look like.

So in that way, it's been restricted

in a way what can be done very early.

In this Committee there are

experts from different Ministries,

we have the Ministry of Finance,

Infrastructure...

Sorry, something happened.

I lost my screen. There it is.

And culture and Social Affairs.

There are experts from public agencies,

There are five public agencies.

There are three industry experts.

And then that's only one

from Civil Society,

and that's me,

so no consumer's organisation or so on.

I'd like to give you a hint

of how this has been put up in Sweden.

In June there was

a first meeting with experts.

In September there's meeting

with Telecom, eBooks and transport.

And we had a meeting this morning

on banks, so this isn't exactly right.

Tomorrow there'll be

a workshop on eCommerce.

There hasn't been decided how to deal

with audiovisual media services

I'm sure they'll come back

on that issue as well.

Then there would be a meeting

on legislative choices.

How to divide this as there are

many different sectors of the industry?

Is it going to be different legislation

or regulations for the various sectors?

Or are they going to put

everything into one legal act?

Then there's a meeting on market control

and then public procurement.

The important message

from the Secretariat

that's being repeated all the time,

we need your input before Christmas

because now is the time

to give your input,

and there is an email address

where everybody can put input

to the legislation then in the spring

they'll prepare the impact assessment

to prepare the proposal,

so it's really not a lot of time.

I'll now share some of the discussions

that are going on.

There's a big discussion

on what kind of directive this is,

and it's presented

as a full harmonization directive

and in a way we hear that no changes

can be done from the directive.

But it's still a little bit unclear

what the Member States can or can't do.

If we go into these different sectors,

transport for example,

we've heard Alejandro

explain some of the issues there.

The transport sector has

a lot of fragmented responsibilities,

so, it's important that you can travel

from one place to another

whether you come from a region

or coming from a town,

but that is not quite clear

how Sweden will treat this.

EBooks were up very early here

in the discussion as well.

The eBook industry say there are

different intellectual property rights

for different formats.

So they say that ePub 2 is actually

the standard at the moment

some use ePub 3,

but when they negotiate the rights,

they say eBook 3 is called

an enhanced eBook,

So there is discussion,

is this included or not?

What about audio books?

That is very big in Sweden.

What about digital learning material

that is provided

like a streaming service

and not a book as such?

This is the discussion

that is going on.

When it comes to ICT and Telecom,

the discussion is about

what is not included,

different software, routers, etc..

And bank services, the legislation

might look different in Finland.

But, then from Sweden,

what about services

for companies and employees, etc..

Then there's a discussion,

is this a product or a service?

Then, of course,

there are different obligations

that Inma explained about.

There is a lot of discussion

about the legislative choices,

The industry will need support

and monitoring.

Is this going to be

within the same agency?

Or is it going to be integrated

in one place?

What about market control

and complaints?

Are they going to be sectoral

for each branch of the industry?

Or one stop shop?

The consumer right to go to court

that Inma mentioned in Article 29.

There is a mentioning go to court

or to an administrative body.

And that is also another question.

And then,

is there going to be

a soft way of getting the industry

to adapt to these rules,

or are you going to use the sanctions?

I think Inma talked about that a bit.

Then there was discussion

about jurisdiction outside of Europe.

These are examples of what is up

for discussion at the moment.

Now I hope I won't repeat

a lot of the things

that Alejandro mentioned,

but I'd like to say, of course,

now that legislation comes

to these different industries,

a lot of stakeholders haven't worked

at all with accessibility.

So the awareness is very low,

and when something is not known,

there is also a lot of fear

that it'll be enormous burden.

So my advice, as Alejandro said,

start early,

and involve accessibility experts.

Also, try to find people

from the industry

that knows some things,

and that are already

understanding accessibility

apart from consumer organizations

and others.

I also think that it's very good

that the EDF is very open

with the toolkit and this webinar

because I think it's very important

to reach out

to all of those stakeholders

that will be involved

in implementing this directive.

So try to make open webinars

and cooperate

so that you can address

the issues of lack of transparency

and fragmented responsibilities.

It might not always be the case

that you want to be not transparent.

I think everybody wants to be that

maybe also because of Corona

you have to do small meetings,

so everybody gets heard.

Try to let it out so more people

know and learn about this directive.

I also think often, in many countries,

there is a focus on cost for industry.

I think it's very important to supply

informational studies on benefits.

For example, if I hear industries

say it'll cost

it's a lot of money anyway,

to implement this directive

with new technology, etc.,

then what about the technology

that they are planning

to change within all these years?

This is not just an extra cost,

it's something you can integrate

into things already planned.

I really think it's important

to find the benefits also

when there are

national impact assessments.

And what we used in Sweden

to get into the Committee

it's the right to be

meaningful and effective,

an effective active involvement

of the UN CRPD, Article 4.3.

We'll have a reference group

with more members from the DPOs

and I think that's very helpful.

We'll have a meeting in October now.

Then I'd like to encourage

European cooperation,

many questions asked

simultaneously in different countries,

and maybe we can help each other

to answer those.

So, rounding up, I think I'd like

to put up some ideas for cooperation.

We can be better sharing experiences

in a group,

wiki or even in a transparent group.

We learned from the industry

that they've used,

like tool, like teams

where they share files

with their members.

So I actually did the same

with my reference group.

We can discuss and talk meantime.

Maybe we can do it on a bigger level.

On the European level.

And try to have these frequently

asked questions answered.

What are these questions?

Can we answer them together?

Then I put here something

that is not very understandable.

In the US they have a voluntary

product accessibility template

that is kind of form

for self-declaration.

These templates will probably occur,

I don't know, but try to be concrete

because the industry doesn't know,

exactly what they are meant to do.

Then, again, the standard

that Alejandro mentioned,

accessibility following

a Design for all approach EN 17161,

we've managed to get the public agency

to pay for free access

to this standards in Swedish.

And that is very good.

Everybody can download it

without any cost.

And we are a also discussing

certification way

to have more industries

certifying themselves.

So, I'll end with the same thing

that Alejandro said,

act now before it's too late.

And I'd like to end also

with a little bit of inspiration

from our neighbour country,

Norway, where they actually,

in 2013 included

both public and private companies

when it comes to accessible ICT.

So, let me see if I can put

the quote here from their website.

In Norway we want a society

where everybody can participate.

Therefore, universal design of ICT

is a requirement

for both public and private sector.

So I'll end now.

Thank you for your attention.

I put extra material here, also.

If you need to explain differences

between accessibility, universal design,

a bit about the standard, etc.

You can use the slides

that are in here.

So thank you very much.

HAYDN: Thank you very much, Mia.

We'll make those resources available.

If you want to check out those links,

as they can be very useful for you

and your respective organizations.

Mia, I have a question for you

that has come through

which refers

to what you're already spoken about.

If you could give a number one tip

to get the governments

listening to organization

for persons with disabilities,

what would it be?

If you had one top tip to give.

MIA: Well, if you haven't had

any contact at all,

because we work with the government

from the beginning of the process

If you don't have any contact at all,

as Alejandro said, get to the focal point

and claim your right to be involved

with Article 4.3. That's the first one.

I give you a second one.

Go and try to get others

to work with you that are already

on board and understand accessibility.

HAYDN: That's a good place to start.

Thank you for that question

Alejandro and Inma,

I'll also ask you to come back.

We have just under ten minutes left

and we have a few questions for you.

Let me just open the document

with the questions.

One of them, the first one

I should ask Inma.

Given the I want crease

importance of streaming services,

could you clarify if these

are included in the scope of the act?

INMACULADA: Do you mean

like this type of teleconferencing?

HAYDN: My understanding is

streaming services,

so maybe for watching television,

things like this.

INMACULADA: Okay, so.

When it comes to content,

that would be covered by

the Audiovisual Media Service directive.

When it comes to the services

that provide access to that content,

then it's covered

by the Accessibility Act.

We need to be precise

in that specific question

because you can have...

If you're referring to platforms

in which the material

of audiovisual media service is shared,

those would not be covered.

So I cannot give you an answer

without going into the details.

HAYDN: Thank you

and also for that question,

I hope I interpreted it correctly.

Let me know if it wasn't the case.

INMACULADA: Alejandro wants

to say something.

HAYDN: Go ahead.

ALEJANDRO: Thank you, if I may,

just to add on what Inma said.

If we talk about video streaming, so,

video on demand services,

such as Netflix or HBO,

as Inma mentioned,

this is the service itself,

the website, the App

that we use to watch the content

is covered by the Accessibility Act,

but the content is covered

by the AMSD.

I take advantage of this question

to refer to our webinar

and our toolkit

about the AMSD.

Something we stress

in those materials is to adopt

at national level

qualitative and quantitative target

for audiovisual content.

The Accessibility Act can be

an opportunity to adopt

at national level,

accessibility requirements

when it comes to audio description,

sign language interpretation or subtitles

for the Deaf and Hard of Hearing,

but those qualitative targets

should be adopted

in the framework of the transposition

of the AVMSD.

And quantitative targets meaning

that the governments need to set up

a percentage of content and increasing

percentage of content over time

to make sure that, for instance,

by next year we'll have,

with audio description.

By the following one, 25%,

by the following one, 30%.

So we need to work out

with these two legislations

at national level to cover, again

from end to end, the service itself.

In this case,

video streaming services.

HAYDN: Thanks for the clarification.

The next question, Alejandro,

I'll ask to you but any of the panellist

can feel free to come in.

We received a question asking:

how do you see the link

between the European Accessibility Act

and the Web Accessibility Directive?

Is there a complementarity

between them?

ALEJANDRO: Yes, it is.

Whereas the Web Accessibility Directive

covers public sector bodies,

mainly the public administrations

and public services online

the Accessibility Act covers

web accessibility as well

in other services, most of them that

we've seen in the Accessibility Act:

transport services,

electronic communications,

and very importantly eCommerce

because with eCommerce,

we'll cover many websites

and mobile applications.

I'd say, almost all of them,

because all of them

they try to sell you something, so,

they'll qualify as eCommerce.

And the way

in which the Accessibility Act

and the Web Accessibility Directive

are aligned is

by the accessibility requirements,

which are the same.

A website or mobile App must be

understandable, perceivable,

operable and robust, which are

the principles of web accessibility

in the end what matters is

the standard that proves compliance

with both directives

will be aligned, will be the same.

I don't know if Inma

would like to add anything.

INMACULADA: Yes, I'd like to add

one thing,

why the Web Accessibility Directive

imposes obligation

to public sector bodies

and define with public sector bodies.

The European Accessibility Act puts

the obligations

on the economic operators

whether they're public or private.

If they deliver a particular service

in the scope of the directive,

they have to comply

with the obligations of it.

Meaning they don't have only to comply

with the accessibility requirements

but other provisions for conformity,

market surveillance, assessment

and enforcement also would apply.

This is important to keep in mind.

It's not that the Act only deal

with private operators at all.

Any organization that acts

as an economic operator,

because they sell or provide a service

for remuneration, as the Treaty says,

would be in principle covered.

Of course, except for exceptions

contemplated in the directive.

HAYDN: This also leads me

on to another question we got,

which asks where can

a company ask

for an authoritative decision

to find out

if the European Accessibility Act

will apply to their product or service

when it's not obvious? For example,

whether a computer is a consumer product

or whether a service is eCommerce.

Is there anybody

who would like to jump in?

INMACULADA: Yes, I can.

HAYDN: Thank you.

The moment that we have

the Accessibility Act

luckily doesn't become

a philosophical question

The Accessibility Act, for the purpose

of the directive indicates

computers and their operating systems

are products,

so they're a team of products

that apply,

and eCommerce is a service

and theme of the service applies

for the purpose of this directive.

That's it.

Of course, if they really want to have

an authoritative decision at the end.

I mean I wouldn't go as the first point

to have an authoritative decision.

I'd read the directive,

I'd make up my mind,

then I'd go to talk

with the authorities,

with market surveillance

or those responsible for services.

And finally, if they disagree

with that,

they can also take action

in front of the appropriate body.

HAYDN: Thank you. Very clear response.

We're drawing to a close,

I think we probably have time

for one last question.

There was a question that was asked,

but I think Mia

probably responded to it

about what organizations

or individuals should do

if they have concerns

about how the government is planning

to implement the act.

So I think, probably

that's been addressed by Mia.

The final one that was asked

at the beginning of the webinar was

and maybe Alejandro,

you could take this one.

As an EU resident, how can I be informed

on public consultation opportunities?

So maybe you could talk

a little bit how at EDF we follow this,

and how we engage

in these open consultations.

ALEJANDRO: Public consultations

at EU level?

HAYDN: Uhhum.

ALEJANDRO: Well, at EDF

we internally run consultations

across our membership,

so we have different Committees.

We have a board,

and we also have expert groups.

Expert groups on different topics

on ICT, on built environment,

on transport, on standardization.

So every time we're consulted

we check with our membership.

At European level more precisely

Inma may be, actually

in better position to answer.

The Commission has a portal

which is not very accessible

on public consultations

in which they consult citizens

and organizations to give feedback

on proposals or road maps

for legislation and so forth.

They are different possibilities there.

Another institutions

such as the EU Parliament,

they have other ways to bring

a case up to the attention of the EU.

For example, the petition's committee

in the Parliament.

I don't know, Inma

if you'd like to add anything

anything on ways to provide

feedback on consultations.

INMACULADA: Just that there is

a webpage in Europa

where all the consultations are placed:

EC.Europa.EU/info/consultations,

There you can find the consultations

all in the same place,

or most of them, I'd never dare

to say all,

but most of them should be.

It's an entry point.

You can find there an entry point

for all types of consultation.

They tell you which consultations

are open, and yes,

the majority of them are there.

HAYDN: There you go,

that's the answer to your question.

And unfortunately, our time is up,

so, to conclude,

I'd simply like to thank

all of you today who are attending.

We hope that you found

today's webinar useful.

Don't hesitate to contact us

if you have further questions,

maybe you thought of some just now,

just send them in to us.

Of course, I want to thank

our speakers,

so Inma, Alejandro and Mia.

I'd like to thank our interpreters,

again, Gerdinand and Lisa.

Our captioner, Kimberly.

And also, to the colleagues

who have been working very hard

behind the scenes to make it possible,

Raquel, Karin and Mher.

I'd like to thank you all

for your support

and hope you have a nice afternoon.

Thanks very much for joining.

Thank you.