



European Accessibility Act Toolkit for transposition

European Disability Forum

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Table of contents

Table of contents	1
About the European Disability Forum (EDF)	2
About this toolkit	2
Part 1 – Orientation and key information	3
1. Key documents	4
2. Timeline from transposition to implementation	4
3. ‘Minimum harmonisation’ Directive	5
4. Key definitions	6
5. Key players for transposition at national level	10
Member States (EU Countries)	11
Market Surveillance Authorities	13
Organisations of persons with disabilities and other civil society organisations	13
Economic operators	14
The European Commission	15
Working Group	15
Part 2 – Working towards effective transposition	16
1. Scope	16
2. Accessibility requirements	19
3. Obligations of economic operators dealing with products	20
4. Obligations of service providers	21
5. Obligations related to answering of emergency communications to the single European emergency number 112	22
6. Fundamental alteration and disproportionate burden	23
7. Market surveillance of products and Union safeguard procedure	24
8. Compliance of services	26
9. Accessibility requirements in other Union acts	26
10. Enforcement	27
11. Penalties	28
12. Transposition and transitional measures	29
13. Report and review	29
14. Annexes:	30



15. Other aspects you could advocate for.....	32
Final considerations	32
Reference Documents	33
A. Legal Documents.....	33
B. Standards and guidelines	34
C. Useful contacts	34
Acknowledgments.....	35
Contact persons at the EDF Secretariat:.....	35

About the European Disability Forum (EDF)

The European Disability Forum (EDF) is an umbrella organization of persons with disabilities that defends the interests of over 100 million persons with disabilities in the EU. It is a unique platform run by persons with disabilities and their families, and is a strong, united voice of persons with disabilities advocating for the implementation of the UN Convention on the Rights of Persons with Disabilities (UN CRPD) in the EU.

About this toolkit

With this toolkit we aim to give disability advocates tools and proposals to push for strong national legislation and adequate implementation complying with the European Accessibility Act, referred to as ‘the Act’ throughout this text. In order to get the most of this document, we advise you to consult it together with [our first analysis of the Act](#), which was published in June 2019.

In [Part 1](#) of the toolkit, we provide a brief introduction of the Act with related key documents and definitions, provide a timeline for transposition and implementation, and indicate who the main players of the process are. We will also explain that this Act is a ‘minimum harmonisation’ Directive and what this means in practice.

In [Part 2](#) we aim to explain what the Act covers. We will expand on the most important provisions of the Act to consider during the transposition phase. We will then suggest how these can be improved at national level where appropriate. We will also cover important aspects of the Act regarding enforcement, monitoring and reporting, and European Commission’s review of how Member States implement the Act in the years to come.



When referring to provisions of the Act, we will provide the relevant article in parentheses to help you locate it in the text of the Accessibility Act.¹ For example, when we mention the ‘scope’ of the Act we will refer to (Art. 2).

Advice for organisations of persons with disabilities

- ❖ You will find the above headings under every element where we advise you on how to advocate for strong national laws.
- ❖ This may be advice on who to contact, or how to find out who you must contact.
- ❖ It can also be advice on specific issues to address when contacting the relevant bodies.

Part 1 – Orientation and key information

The European Accessibility Act² (EAA), is an EU law that will set new EU-wide minimum accessibility requirements for a range of products and services.³ It seeks to strengthen the right of persons with disabilities to access goods and services available in the EU internal market. The Act is a [Directive](#), which means it sets binding accessibility goals but leaves to the Member States of the European Union (Member States) to decide how they want to reach them. It was adopted in 2019 with several shortcomings, including the failure to adequately address the accessibility of transport and the built environment. Despite this, the Act completes and complements other EU legislation tackling accessibility,⁴ as we will indicate throughout this toolkit.

The Act came into force on 27 June 2019 and Member States have three years to transpose it into national law, this means to introduce new and/or update existing national legislation to comply with the Act. EU countries must communicate the text of said national legislation to the European Commission.

¹ See [Part 1.1 for the link to the text of the European Accessibility Act](#).

² Full name: Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (Text with EEA relevance)

³ More information can be found at the [Commission webpage on the Directive](#).

⁴ EU funds regulations, Public Procurement Directive, Web Accessibility Directive, Audiovisual Media Services Directive and European Electronic Communication Code.



1. Key documents

- **The European Accessibility Act** (Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services). [Full text of the Act is available in all EU languages](#). To begin with you can read a [short summary of the content](#) of the Act.
- **United Nations Convention on the Rights of Persons with Disabilities (the Convention)**. [You can find it in different languages](#) – The EU and all Member States have ratified the Convention and therefore are obliged to ensure persons with disabilities' equal right to access to the physical environment, to transportation, to information and communication, and to other facilities and services open or provided to the public. They also must take appropriate measures to ensure that private entities that offer facilities and services which are open or provided to the public consider all aspects of accessibility for persons with disabilities.⁵
- **General Comment No. 2 (2014) on Article 9: Accessibility** provides more detailed explanation on EU's and Member States' obligations to ensure accessibility for persons with disabilities under the Convention. [Link to the text of General Comment No 2 in English, French, Spanish, Arabic, Russian, and Chinese](#).

2. Timeline from transposition to implementation

The Act came into force on June 27 2019, so the deadlines are always on the 28 June of a given year. Member States and services can implement the provisions before the deadline.

2022 Deadline for Member States to adopt and publish national laws, regulations and administrative provisions to comply with the Act. They shall immediately communicate the text of those provisions to the Commission.

2025 Deadline for Member States to apply those measures.

⁵ This means the Act does not create new requirements for the Member States as they are already obliged to implement the UN Convention, which considers accessibility as a pre-requisite to enjoy all the rights enshrined in the Convention.



- 2027 Deadline for Member States to ensure accessibility of the answering of emergency communications to the single European emergency number '112'.
- 2030 Deadline for services to stop using inaccessible products which were already in use before 28 June 2025.
- 2030 Deadline for submission of the first report by the European Commission on the application of the Act. This reporting must be done every five years thereafter.
- 2045 Last possible date for services to use inaccessible self-service terminals. Services can continue using self-service terminals in use before 28 June 2025 until the economic life of those terminals, but no longer than 20 years after they start using those terminals.

3. 'Minimum harmonisation' Directive

The Directive only sets out the **absolute minimum requirements** that must be met without further detailing how to comply with these requirements. Member States may adopt national laws that are more ambitious than the EU text, but never softer or contradicting. They can also make voluntary accessibility requirements of the Act (for example, on built environment), compulsory in their national legislation. Similarly, they can cover other products not included in the Act (for example, smart household appliances) and use the accessibility requirements of the Act for them.

Countries also have some freedom on implementation deadlines, and in some cases, may choose to make them shorter than proposed by the Act. For example, the Act says Member States may allow service providers to continue using self-service terminals already in use before 28 June 2025 for the provision of similar services until the end of the economically useful life⁶ of those terminals, but no longer than 20 years after their entry into use (Art. 32.2). This means that countries may also shorten this deadline.

Advice for organisations of persons with disabilities

- ❖ Agree on a common strategy with other organisations of persons with disabilities and social partners how to advocate that your country goes beyond the minimum

⁶ The expected period that a product remains useful to the owner



requirements of the Act. This can be done by proposing to turn voluntary accessibility requirements into obligatory (for example, those for the built environment), or by proposing new products and services not in the scope of the Act that can make use of the same accessibility requirements proposed by the Act (for example, smart household appliances, tourism services). We will give you more guidance in Part 2.

- ❖ Call to shorten deadlines for implementation when feasible, and especially related to aspects which you consider critical for you (for example, accessibility of answering to the single European emergency number '112' by PSAPs), or which are unreasonably long (for example, existing self-service terminals).

4. Key definitions

This section explains the main legal and technical terminology necessary to understand the Act, and get involved in national transposition negotiations.⁷ In this toolkit we will only use those terms that are important for persons with disabilities during national transposition of the Act. We will also explain terms which are not explained in the Act but are used in it and/or are necessary for background knowledge. The latter ones will be marked with an asterisk (*). The definitions will not follow an alphabetical order but be grouped based on their relevance to each other.

Terms related to products and services

Product means a substance, preparation, or good produced through a manufacturing process, which is not food, feed, living plants and animals, products of human origin and products of plants and animals relating directly to their future reproduction.

Service* means any self-employed economic activity, usually provided for a fee.⁸

Assistive technology is any item, piece of equipment, service or product system including software that is used to increase, maintain, substitute or improve functional capabilities of persons with disabilities. These technologies have important enabling role for the independence and full participation of persons with disabilities in society.

⁷ The full list of definitions used in the Act can be found in Article 3 (Chapter I) of the Act.

⁸ Point 1 of Article 4 of [Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market](#)



Audiovisual media service* is a service which is under the editorial responsibility of a media service provider and has the primary purpose to provide programmes to the general public by electronic communication networks. This service is either a television broadcast or an on-demand audiovisual media service (e.g. Netflix, HBO, Amazon Prime, etc.); audiovisual media service also includes audiovisual commercial communication (e.g. TV ads).⁹

Services providing access to audiovisual media services means services transmitted by electronic communications networks which are used to identify, select, receive information on, and view audiovisual media services and any provided features, such as subtitles (also called captions) for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation, which result from the implementation of measures to make services accessible as referred to in Article 7 of Audiovisual Media Services Directive.¹⁰ This includes electronic programme guides (EPGs),¹¹ TV set top boxes, websites and mobile apps of TV channels and video on demand platforms, and any other means to access audiovisual media services.

Electronic communications service* means a (usually paid) service provided via electronic communications networks, which includes internet access, interpersonal communications services (for example, traditional telephone calls, video calls, SMS between two individuals but also all types of email or messaging services, or group chats).¹²

Real time text (RTT) is text transmitted instantly as it is typed or created. Recipients can immediately read the message while it is being written, without waiting.¹³

Total conversation service* is a multimedia real time conversation service that allows simultaneous video, voice and real time text service in telecommunications. Total conversation enables people in two or more locations to: (a) see each other, (b) hear each other, and (c) conduct a text interaction (real time text) with each

⁹ Point (a) of Article 1(1) of [Directive \(EU\) 2018/1808](#)

¹⁰ The Audiovisual Media Services Directive (AVMSD) creates an EU-level framework to coordinate national legislation on all audiovisual media, both traditional TV broadcasts and on-demand services (for example, Netflix, Amazon Video, Now TV). One of its aims is to ensure that audiovisual media content becomes accessible to persons with disabilities. Read [EDF toolkit on transposition of AVMSD](#) for more information.

¹¹ [Electronic program guide \(EPG\)](#)

¹² Point 4 of Article 2 of [Directive \(EU\) 2018/1972](#)

¹³ Legal definition in point 14 of Article 3 of [Directive \(EU\) 2019/882](#)



other, or choose to communicate with any combination of those three modes and to do so in real time.¹⁴

Rail passenger transport services* means all rail passenger services that are covered by Regulation on rail passengers' rights and obligations (EC) No 1371/2007.¹⁵ Railway undertakings, the activities of which are limited to the operation of urban, suburban or regional services, are out of the scope of the Act.

CE marking:* The letters 'CE' appear on many products traded on the extended Single Market in the European Economic Area (EEA). They signify that products sold in the EEA have been assessed to meet high safety, health, and environmental protection requirements. When you buy a new phone, a teddy bear, or a TV within the EEA, you can find the CE mark on them. CE marking also supports fair competition by holding all companies accountable to the same rules.

Economic operator is either a manufacturer, the authorised representative of the manufacturer, the importer, or the distributor of a product, or a service provider.

Microenterprise is a business which employs fewer than 10 persons and which has an annual turnover or balance sheet total not exceeding EUR 2 million.

Persons with disabilities is defined in the Act as persons who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. In the text of the Act the terms **consumers with disabilities** and **end-users with disabilities** are used interchangeably.

Terms related to emergency communications

Public safety answering point or 'PSAP'* means a physical location where an emergency communication is first received under the responsibility of a public authority or a private organisation recognised by the state. The wording '**most appropriate PSAP**' is often used in the Act. This means a PSAP which is established by responsible authorities to cover emergency communications from a certain area or for certain type of emergency communications. For example, PSAPs are the centres that receive and respond emergency calls (like 112 calls), and send help (firefighters, police, or ambulance).

¹⁴ See legal definition in point 35 of Article 2 of [Directive \(EU\) 2018/1972](#)

¹⁵ Article 2(1) of [Regulation \(EC\) No 1371/2007](#)



Terms related to EU regulation and harmonisation

Standards* are voluntary technical documents with the main objective to ensure a common approach to developing products and services: electricity plugs, elevators, mobile phone chargers, subtitling, etc. Standards are crucial to guarantee adequate levels of quality, safety, environmental friendliness, and accessibility for persons with disabilities.

- **European standard*** is a standard adopted by the European standardisation organisations CEN, CENELEC or ETSI. ([Find out more about European standardisation organisations](#)). European standards are abbreviated with the letters 'EN' in form of a reference number.
- **Harmonised standard*** is a European standard adopted based on a request made by the European Commission for the application of European Union harmonisation legislation (such as the Accessibility Act). Harmonised European standards are referred to in the Official Journal of the EU and are abbreviated with the letters 'HEN'. Organisations and companies can follow harmonised standards to show that they are complying with EU legislation.

Technical specifications* describe technical requirements to be fulfilled by a product, process, or service to comply with legal obligations. In relation to the Act, the European Commission may establish technical specifications to meet the accessibility requirements in case there are issues or delays with drafting a standard (see implementing act, below).

Delegated act:* this is an EU legal tool which allows the European Commission to either amend or supplement a piece of EU law without having to do a comprehensive revision of the specific law. An example of a delegated act in relation to the Accessibility Act, is Commission's power to adopt delegated acts to further specify the accessibility requirements laid down in Annex I of the Act to ensure these have the intended effect. This is particularly important for the interoperability requirements of the Act, for example, those related to emergency communication across the EU or the use of assistive technologies.

Implementing act* may be adopted by the European Commission in areas where uniform conditions across the European Union for implementation are needed. In relation to the Accessibility Act, the Commission may adopt implementing acts to ensure a harmonised approach to accessibility in relation to the products and services covered by the Act across the EU. Specifically, the Commission may adopt



an implementing act establishing technical specifications that meet the accessibility requirements in case of undue delays or rejection of the mandate by the standardisation organisations to draft a harmonised standard.

Advice for organisations of persons with disabilities

- ❖ Call on your national legislators to expand some of the definitions that are currently limiting the scope of the Act. In particular, definition of:
 - **Passenger transport services** definitions must be expanded to include regional, urban and suburban transport services and vehicles (Art. 3.31-3.36), because they only cover long-distance travel. As for rail transport services, recommend your government to take definition in Art. 3.33 without the exemption.
 - **Banking services** must be extended to enable persons with disabilities to work in the financial sector and make the uptake of accessibility easier for banking services. For the moment, the Act limits the type of banking services that will need to be accessible and inclusive to **consumer banking services**. It covers:
 - Credit agreements
 - Reception and transmission of orders in relation to one or more financial instruments
 - Execution of orders on behalf of clients
 - Dealing on own account
 - Investment advice, and other additional services
 - Payment services
 - Services linked to the payment account and electronic money.

Remind your national lawmakers that inaccessibility of banking services which lead to inability of persons with disabilities to work in the banking sector is a breach of [Council Directive 2000/78/EC general framework for equal treatment in employment and occupation](#).

5. Key players for transposition at national level

Below we briefly introduce the main actors involved in the transposition process and how they carry out their work. We also provide advice on advocacy on them, when relevant.



Member States (EU Countries)

Each government is responsible for transposing the Act into national law, meaning that they need to adopt new legislation or reform existing laws in order to comply with the Act, and they are responsible for the EAA implementation. Given that the Act covers different domains (public procurement, digitalisation, telecommunication, transport, etc.), it is very likely that more than one ministry is involved in the transposition of the Act.

Advice for organisations of persons with disabilities

- ❖ Identify the relevant Ministries involved in transposition and contact them as soon as possible – they are already preparing for it. If you don't know who oversees this work, ask
 - Your minister in charge of disability affairs
 - Your CRPD focal point
 - Your minister in charge of digital affairs, telecommunications or internal market
 - Us! We at the EDF Secretariat can try to help identify relevant national contacts.
- ❖ Write to the responsible ministry or ministries and request an appointment to set out your position and offer your advice.
- ❖ Remind them of their obligations to make goods and services accessible to persons with disabilities under the UN Convention on the Rights of Persons with Disabilities, and stress that the Act does not create any additional requirements for them.
- ❖ Refer to relevant national consumer rights protection, anti-discrimination and equality legislation, to stress your right as a consumer and highlight that lack of accessibility will lead to discrimination and breach of national anti-discrimination laws.
- ❖ Explain that effective transposition of the Accessibility Act is necessary to ensure effective application of the accessibility provisions of the [Public Procurement](#)



[Directive](#) and EU funds¹⁶, the [Audiovisual Media Services Directive](#) and the [European Electronic Communication Code](#).

- ❖ Be prepared to demonstrate the benefits of more ambitious provisions on accessibility of products and services for persons with disabilities and the wider society.
- ❖ Demand that national laws specify the necessary conditions, such as accessibility of monitoring, complaining, reporting procedures, and financing, enabling organisations of persons with disabilities to effectively cooperate with market surveillance authorities.
- ❖ Advocate to include in national law clear provisions on ensuring the political and financial independence of market surveillance and other relevant authorities, as well as provisions addressing sufficient financial, human resourcing and training for accessibility expertise.
- ❖ Contact members of your national parliament who have an interest in disability and accessibility. They may be able to help you to put pressure on the government to ensure an effective implementation of the Act.
- ❖ Contact your Members of the European Parliament, who you think can be supportive as well. [Find their contact details](#).
- ❖ Contact your national [equality body](#). Many equality bodies are mandated to protect persons with disabilities from discrimination and promote their equality in relation to accessing goods and services. As public bodies, they can provide with legal guidance and may be able to connect you with relevant government authorities.
- ❖ Contact [National Human Rights Institutions \(NHRIs\)](#), public bodies whose role is to protect and promote human rights at the national level. They address the full

¹⁶ Article 42 of the Public Procurement Directive obliges to take accessibility into consideration when drafting technical specifications of public contracts. When it comes to the use of EU funds, “accessibility for persons with disabilities shall be taken into account throughout the preparation and implementation of programmes” (art. 7 of the [Common Provisions Regulation](#))



range of human rights topics, including on disability rights and human rights in business.

Market Surveillance Authorities

Market Surveillance Authorities ([see Part 2.7](#)) will have the crucial role of ensuring that:

- Services and products covered under the Act comply with its accessibility requirements when they are introduced into the EU market
- Economic operators provide adequate proof when they claim that complying with an accessibility requirement under the Act would result in fundamental alterations to their services and products or put disproportionate burden on them ([see Part 2.6](#)).

The authorities must cooperate closely with organisations of persons with disabilities when carrying out their duties.

Advice for organisations of persons with disabilities

- ❖ Identify the designated market surveillance authority in your country and contact them. The Act states that they should cooperate with you during implementation, so try to establish a strong relationship with them.

Organisations of persons with disabilities and other civil society organisations

Organisations of persons with disabilities (DPOs) are mentioned as key stakeholders in the Act. They are important partners of market surveillance authorities to carry out market surveillance of products and check compliance of services with the requirements of the Act. These organisations may also bring complaints before the court or competent administrative body to enforce obligations under the Act (Art 29.2(b)).

DPOs will be involved in the establishment of harmonised standards and technical specifications for meeting the accessibility requirements of the Act. Finally, these organisations will participate in the working group established by the European Commission to facilitate and monitor the implementation of the Act (Art. 28), and contribute to the Commission reporting (Art 33.4).

Advice for organisations of persons with disabilities



- ❖ Engage with these other groups with similar interests, including those representing persons with different disabilities, and older persons' organisations, to find out if you can work together on the Act.

Dialogue with national authorities is more effective when part of a large coalition that agree a common strategy before meeting with government representatives.

- ❖ Work with consumer organisations, such as members of [BEUC](#), at national level to make them aware of the Act and its particularities so they are better placed to integrate the concerns of consumers with disabilities into their own advocacy at national level.

These organisations usually have existing links with market regulators and relevant ministries. This could also help with other advocacy work long term, including in areas not covered by the Act.

- ❖ When advocating towards ministries, market surveillance authorities, or economic authorities, engage in ongoing dialogue with technical professionals and decision-makers at management level. Politicians and management at higher level can ensure support and resources to technical experts so that they can realise their roles effectively.

Economic operators

Public and private economic operators (any manufacturer, their authorised representative, importer, distributor or a service provider) must ensure that any products they place in the EU market or any services they provide covered by the Act comply with the requirements of the Act.

They are obliged to cooperate with market surveillance authorities to assess whether compliance of their products with the Act's accessibility requirements has been breached. If non-compliance is proven, they must take immediate corrective measures to ensure the product meets the accessibility requirements or withdraw the product from the market (Art 20.1).

See [Part 2.3 for further information on obligations of economic operators dealing with products](#) and [Part 2.4 for obligations of service providers](#).

Advice for organisations of persons with disabilities



- ❖ Highlight that contact points made available by manufactures (Art 7.6) and importers (Art 9.4) should be not only ‘easily understood’ but also accessible to persons with disabilities.

The European Commission

The European Commission has the power to pursue infringement proceedings against a particular Member State in case of late, incorrect transposition or application of the Directive. The Commission may learn about such infringements through complaints by citizens, parliamentary questions or monitoring carried out by independent consultants. Read more about infringement procedures [on our website](#).

In certain cases, the Commission has the power to adopt delegated acts to further specify the accessibility requirements laid down in Annex I of the Directive (Art 4.9). It can also ask the European Standardisation organisations to draft **harmonised standards** for the product accessibility requirements set out in Annex I. In case of undue delays, rejection of the mandate by the standardisation organisations or a standard not fulfilling the requirements of the Act, the Commission can adopt **implementing acts** to establish technical specifications that meet the accessibility requirements.

The Commission also has the power to adopt **delegated acts**¹⁷ to ensure interoperability or to further specify the criteria for assessing whether meeting accessibility requirements can put disproportionate burden on an economic operator (Art. 14.7).

Finally, the Commission will review the implementation of the Directive and assess its impact, and can propose further appropriate measures which could include legislative measures when necessary (Art. 33).

Working Group

The Working Group will be established by the European Commission as a platform for cooperation and practice exchange for better implementation of the Act. It will consist of:

- Representatives of market surveillance authorities
- Authorities responsible for ensuring compliance of services

¹⁷ [See Part 1.4 for definitions of implementing acts and delegated acts.](#)



- DPOs
- Other relevant stakeholders (Art. 28).

The Group will:

- Monitor the implementation of the fundamental alteration and disproportionate burden ([see Part 2.6](#)) provisions (Art. 14), and advise the Commission in relation to this article
- Advise the Commission on the implementation of the accessibility requirements provisions of the Act (Art. 4).

Part 2 – Working towards effective transposition

In this section we aim to explain what the Act covers. We will expand on the most important provisions of the Act to consider during the transposition phase. We will then suggest how these can be improved at national level where appropriate. We will also cover important aspects of the Act regarding enforcement, monitoring and reporting, and European Commission's review of how Member States implement the Act in the years to come.

1. Scope

The scope of the Accessibility Act is limited (Art. 2). It focuses mainly on digital products and services and does not cover areas such as health care services, education, transport, housing, or household products. Implementation of accessibility requirements of the built environment are left to the will of the EU countries. The Act covers:

Products placed on the market after 28 June 2025:

- Consumer general purpose computer hardware systems (i.e. computers, tablets, laptops) and operating systems for those hardware systems (e.g. Windows or MacOS)
- Payment terminals (for example, in shops or restaurants)
- Self-service terminals related to the services covered by the Directive (ATMs, ticketing machines, check-in machines, and interactive self-service terminals providing information, excluding terminals installed as integrated parts of transport vehicles, aircrafts, ships or rolling stock)



- Consumer terminal equipment with interactive computing capability, used for electronic communication services (in other words, Smartphones, tablets capable of calling)
- Consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services (for example, TV equipment, such as smart TVs, involving digital television services)
- E-readers (for example, Amazon Kindle or Tolino e-reader)

Services provided to consumers after 28 June 2025:

- Electronic communication services (for example, telephony services)
- Services providing access to audio-visual media services (for example, websites or apps of TV channels like BBC iPlayer and video on demand platforms like Netflix)
- The following elements of passenger transport services (except urban, suburban and regional services for which only the elements under point 5 apply):
 1. Websites
 2. Mobile apps
 3. Electronic tickets and electronic ticketing services
 4. Delivery of transport service information, including real time travel information
 5. Interactive self-services terminals except those installed as integrated parts of vehicles
- Consumer banking services (for example, withdrawing money, transfers, online banking, opening a bank account)
- E-books
- E-commerce (meaning, websites or mobile applications through which companies sell their products or services online)

Other elements related to the scope:

- Answering of emergency communications to the single European emergency number '112'
- Built environment used by clients of services covered by the Directive (optional)



- Public procurement for products and services covered by the Directive ([see Part 2.9](#))
- Other/future EU laws containing accessibility obligations ([see Part 2.9](#))

The Act is further limited by the **exemptions** under specific points:

- Self-service terminals installed as integrated parts of transport vehicles, aircrafts, ships or rolling stock do not have to be accessible
- Websites, mobile apps, electronic tickets and electronic ticketing services, and delivery of transport service information, including real time travel information of urban, suburban and regional transport services do not have to be accessible.
- Banking services are limited to consumer services, excluding persons with disabilities from working in the financial sector ([see Part 1.4](#) for further explanation and advice).
- The Act does not cover answering of communications to national emergency numbers.

Advice for organisations of persons with disabilities

- ❖ Advocate to national lawmakers to **go beyond the scope of the Accessibility Act**, and include accessibility obligations for aspects not covered or left voluntary by the Act.
 - **Expand the scope of national laws to:**
 - All transport infrastructure and services including those related to urban, suburban and regional transport, and passenger transport vehicles
 - All banking services
 - Housing
 - Household products, such as washing machines, dishwashers, refrigerators, etc.
 - Tourism services
 - Other areas of life which you find important
- ❖ When you propose new products and services, it will be important to link them with relevant accessibility requirements of Annex I ([see Part 2.14](#)), or to accompany the proposal with their appropriate accessibility requirements.



- ❖ Apply the accessibility requirements for answering to the single European emergency number '112' (Annex I, Section V) to answering of calls to national emergency numbers.

2. Accessibility requirements

Member States must ensure that economic operators **only** place on the market products and **only** provide services that comply with the accessibility requirements of the Act, which are set out in Annex I (Art 4) ([see Part 2.14](#)). Of course, the exemptions highlighted in the Scope still apply ([see Part 2.1](#)).

Additionally, article 4 notes that accessibility requirements of the built environment are optional. It will be up to Member States to decide whether to make these obligatory or not.

An exemption is also made to microenterprises providing services.¹⁸ This is a major limitation as microenterprises provide most non-financial services in the EU.¹⁹

EU countries must develop guidelines and tools for microenterprises to comply with the Act, and they must do so by involving all relevant parties, including organisations of persons with disabilities (Art. 4.6)

Advice for organisations of persons with disabilities

- ❖ Call on your national legislators to make the accessibility requirements for built environment compulsory. An accessible ATM will be useless for many persons with disabilities if they cannot enter the building of the bank due to its inaccessibility! Ensuring equal access to the built environment is also a legal obligation for Member States under Article 9 of the UN Convention on the Rights of Persons with Disabilities.
- ❖ Recommend to your government to update accessibility requirements for the built environment, taking into account what is proposed by the Act, and the [European Standard EN 17210](#) on the accessibility of the built environment. Most likely, your country already has building codes and regulations considering accessibility for persons with disabilities, and this is a chance to improve them further.

¹⁸ Businesses that employ fewer than 10 persons and which have an annual turnover not exceeding EUR 2 million or an annual balance sheet total not exceeding EUR 2 million.

¹⁹ According to the [European Commission's Annual Report on European SMEs 2016/2017](#), microenterprises are by far the most common type of small and medium-sized enterprises (SMEs), accounting for 93.0 % of all enterprises and 93.2 % of all SMEs in the non-financial business sector.



- ❖ Explain that excluding microenterprises that provide services from the accessibility requirement set by the Act will allow majority of service providers to keep on excluding millions of potential customers from their services due to a lack of accessibility. Besides, the Act also foresees flexibility for them in case applying accessibility would impose a disproportionate burden (see below). Therefore, microenterprises should also be covered by national legislation.
- ❖ Ask your government about their plans to develop guidance and tools for microenterprises to comply with the Act, and express interest to help with this if you have the capacity.

3. Obligations of economic operators dealing with products

The Act covers manufacturers (Art. 7), their authorised representatives (Art. 8), importers (Art. 9) and distributors (Art 10) under Chapter III. They must ensure that only accessible products are placed on the EU market. Manufacturers need to carry out a conformity assessment procedure in accordance to Annex IV ([see Part 2.14](#)), and put a CE marking on the products as guarantee of conformity (Art 7.2). Importers need to ensure that this assessment was done, and the product bears the CE marking before importing any product (Art 9.2). Distributors are required to check that the product they distribute bears the CE marking (Art. 10.2).

If at any point an economic operator finds out that a product does not meet the accessibility requirements of the Act, they must take an immediate corrective measure or withdraw the product from the market. Manufacturers (Art. 7.8) and importers (Art. 9.8) must keep a register of products which do not comply with the Act and provide all the technical information to the national authority that requests it. Manufacturers (Art 7.9), importers (Art. 9.9), and distributors (Art. 10.6) must cooperate with market surveillance authorities to bring the product into compliance.

Manufacturers (Art. 7.6) and importers (Art. 9.4) must indicate a single point of contact. The contact details must be in an easy-to-understand language for end-users and market surveillance authorities.

Manufacturers (Art. 7.7), importers (Art. 9.5) and distributors (Art. 10.2) must also ensure that the product is accompanied by instructions and safety information in an easy-to-understand language for end-users.

Advice for organisations of persons with disabilities



- ❖ Highlight to your national lawmakers that the register of products which do not comply with the Act produced by manufacturers and importers must be public and accessible for effective involvement of DPOs.
- ❖ Note that there should be more than one way to reach the contact point provided by manufacturers and importers (telephone, online, in persons) and all should be accessible.
- ❖ Encourage manufacturers to use the [European Standard 'Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users'](#) to develop products which are accessible to a wide range of users, including persons with disabilities.

4. Obligations of service providers

Service providers must ensure that they design and provide services in accordance with the accessibility requirements of the Act (Art. 13.1) and explain how the services meet them. The information needs to be publicly available in written and oral format, in a way which is accessible to persons with disabilities (Art. 13.2).

Service providers must make sure that their service continues to meet accessibility requirements even when there are changes in the characteristics of the service, or in the accessibility requirements, harmonised standards or technical specifications which they are supposed to meet (Art 13.3).

They must also take immediate corrective measures if they fail to meet the accessibility requirements of the Act, inform and cooperate with national authorities in relation to this (Art. 13.4-13.5).

However, unlike other economic operators, service providers are not obliged to have a designated point of contact, nor a register of inaccessible services or products they use to provide services.

Advice for organisations of persons with disabilities

- ❖ Stress to your government that service providers should keep a register of their inaccessible services and the products they use to provide services. This register must be public and in accessible formats. Availability of this information will help involvement of organisations of persons with disabilities, and better assessment



of impact and necessary changes to the Act during the review of the European Commission.

- ❖ Ask your legislators to oblige service providers to have contact points through multiple channels (e.g. telephone, online, in person) accessible to persons with disabilities.
- ❖ Encourage service providers to make use of the [European Standard 'Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users'](#), which can help them develop and provide services accessible to wide diversity of users, including persons with disabilities.

5. Obligations related to answering of emergency communications to the single European emergency number 112

The Act obliges EU countries to ensure that the answering of emergency communications to the single European emergency number '112' by the most appropriate Public Safety Answering Point (PSAP), complies with the specific accessibility requirements listed in Section V of Annex I ([see Part 2.14](#)) of the Act (art. 4.8). In practice, PSAPs must be able to use synchronised voice and text (including real time text), or, where video is provided, voice, text (including real time text) and video synchronised as total conversation.

For this, current telecommunication technologies and the equipment used by the designated PSAP must be enhanced by technologies based on IP (Internet Protocol) networks. PSAPs need to be equipped with the latest communication tools allowing accessible communication with persons with disabilities, which means being able to respond calls using real time text or total conversation.

Advice for organisations of persons with disabilities

- ❖ Remind your governments that they are obliged by the [European Electronic Communications Code](#) to ensure that everyone, including persons with disabilities, has the right to access to emergency services through emergency communications free of charge by the single European emergency number '112' and any national emergency number determined by the country.



- ❖ Encourage that your country extends the accessibility requirements for answering of the single European emergency number '112' to answering of national emergency numbers as well.
- ❖ Explain to your government that current telecommunication technologies used by PSAPs must be complemented by technologies based on IP (Internet Protocol) networks which are more accessible and effective for handling an emergency (for example they allow text, video, location information coming from the caller, which can help optimise the response).
- ❖ Call on your government to set clear plans with timelines and shorter deadlines for implementing the emergency communications accessibility requirements, and upgrading to Internet Protocol as this is a matter of emergency.
- ❖ Explain to your government that innovative solutions such as 112 mobile applications or social networks are emerging, but their integration in existing information systems is difficult and costly. Besides, one of the main goals of the Act and the Electronic Communications Code is to ensure interoperability across the EU, so a person with a disability can reach out to the '112' emergency number using real time text or total conversation, as we do today with voice calls.
- ❖ See [EDF recourses on the transposition of the European Electronic Communications Code \(EECC\)](#) for more advice in relation to accessibility of emergency communications (in particular see Part 2.12 of the EECC toolkit).

6. Fundamental alteration and disproportionate burden

Economic operators will be exempt from the accessibility requirements if those requirements cause a fundamental change to the basic nature of the product or service they provide (Art. 14.1 (a)), or if compliance imposes a disproportionate burden on the economic operator (Art. 14.1 (b)). They must prove this through self-assessment (Art. 14.2) following the Annex VI of the Act, and provide this information to market authorities when requested (Art. 14.3).

Microenterprises dealing with products are only obliged to provide such assessment in case it is specifically requested by the market surveillance authority (Art 14.4).



When receiving external funding, destined to improve accessibility, economic operators are not allowed to make use of the “disproportionate burden” clause (Article 14.6).

Furthermore, the Commission can also adopt a delegated act further specifying the assessment criteria for the exemption. When doing so, it will consider the potential benefits for persons with disabilities, and persons with functional limitations, which is a much larger group and more accurately reflects those that benefit from better accessibility, such as older persons (Article 14.7).

Advice for organisations of persons with disabilities

- ❖ Demand from national authorities that assessments carried out by economic operators are publicly available and accessible to persons with disabilities. This will be useful for monitoring and reporting purposes, as well as for the review of the Act by the European Commission.
- ❖ Remind your national legislators that in its general comment No. 2 (2014) on accessibility the UN Committee on the Rights of Persons with Disabilities disagrees with the notion of disproportionate burden related to accessibility. It notes: “obligation to implement accessibility is unconditional.”²⁰
- ❖ Highlight that in other EU Internal Market legislation such an exemption is not commonplace. Therefore, national laws should either completely delete this article or define very carefully and narrowly the grounds under which exemptions can be granted in line with Annex VI of the Act.
- ❖ Demand that effective measures are put in place to avoid economic operators abusing the ‘disproportionate burden’ and ‘fundamental alteration’ clauses to avoid compliance with the Act.

7. Market surveillance of products and Union safeguard procedure

The role of market surveillance authorities is to ensure the effective application of the Act. EU countries must ensure that these authorities have enough powers, resources and knowledge necessary for the proper performance of their tasks.²¹

²⁰ See point 25 of [General comment No. 2 \(2014\) on Article 9: Accessibility](#).

²¹ Art. 18.3 of [Regulation \(EC\) No 765/2008](#)



These authorities will check compliance of economic operators with the Act, and if relevant assessments are carried out correctly by operators who use the ‘disproportionate burden’ or ‘fundamental alterations’ clauses (Art 19.2). The information held by market surveillance authorities regarding compliance or assessment related to ‘disproportionate burden’ or ‘fundamental alterations’ will need to be provided to consumers in an accessible format should they request such information. However, under certain conditions, such as for the protection of commercial secrets or personal data,²² this information can be withheld from the consumer (Art. 19.3).

In case of non-compliance, market surveillance authorities will require the relevant economic operator to take appropriate corrective action to ensure the product meets the accessibility requirements of the Act. If this fails, they will oblige the operator to withdraw the product from the market (Art. 20.1). When one EU country demands the withdrawal of a product from the EU market for lack of accessibility, other countries must do the same (Art 21.2).

Advice for organisations of persons with disabilities

- ❖ Discuss with national legislators which public entity will take the role of market surveillance authority for the purpose of the Act.
- ❖ Discuss also how government will ensure that market surveillance authorities are adequately funded, staffed, and trained to ensure that they can do their work well.
- ❖ Offer your expertise to national authorities and request:
 - Public and accessible information about compliance of economic operators with this Act or any assessment for exemption by default. Raise the concern that refusing to provide this information for reasons of confidentiality will hinder transparency and involvement of end-users with disabilities in monitoring and reporting procedures, while this involvement is recognized by the Act.
 - Accessible enforcement procedures.
- ❖ Suggest a public database similar to [RAPEX](#),²³ which was developed in the context of consumer safety, that would give an overview of non-compliant products.

²² See Article 19.5 of [Regulation \(EC\) No 765/2008](#)

²³ This is a website of the European Commission and EDF cannot guarantee the accessibility of the content.



8. Compliance of services

Member States will have to appoint a special authority which will:

- a) Check the compliance of services with the accessibility requirements of the Act, and any assessment made by services to exempt themselves from those requirements
- b) Follow-up on complaints or reports of non-compliance
- c) Make sure service providers take necessary corrective measures to comply with the Act (Art. 23.2).

Member States must ensure that the public is informed of the existence of the appointed authorities, and what their role, work and decisions are. The accessibility of this information is not required by default, but only upon request.

The procedures to carry out the above tasks, need to be periodically updated by national governments (Art 23.1).

Advice for organisations of persons with disabilities

❖ Demand from national legislators:

- Clearer timelines and methods for checking the compliance of services. This also means clarifying what 'periodic' updating means
- Consultation with DPOs every time an update of procedures is needed
- Accessible contact and other information of the authorities by default, so that DPOs can effectively cooperate with them
- Accessible, easy to find and simple complaint procedures.

9. Accessibility requirements in other Union acts

The accessibility requirements of the Act will also be mandatory for the products and services covered by the Act that are procured by public authorities for the use of individuals from the public or staff of the contracting authority (Art. 24.1).²⁴ For example, if a public administration buys new computers for the personnel, these computers must comply with the requirements of the Act.

²⁴ See Article 42(1) of [Directive 2014/24/EU](#) and Article 60(1) of [Directive 2014/25/EU](#)



Additionally, for any other publicly procured product, the accessibility requirements provided in Section VI of Annex I can also provide presumption of conformity (Art. 24.2), meaning that if public bodies request these requirements in the technical specifications of a public contract, they will be respecting the accessibility obligations which they are bound to because of the Public Procurement Directive and other EU acts (for example, regarding EU funds). For example, if a public administration wants to buy a new printer with touch screen, in order to make sure that the touch screen is accessible, they can make use of the accessibility requirements relevant for this specific element (the ones related to the user interface). The key will be to use the accessibility requirements of Section VI of Annex I ([see Part 2.14](#)).

The obligation to procure accessible products, services and infrastructure is already in place in the EU Public Procurement Directive.

Advice for organisations of persons with disabilities

- ❖ Demand that Section VI of Annex I becomes mandatory for all products and services purchased with tax payers' money in public procurement.
- ❖ Demand that the accessibility requirements for the built environment laid down in Annex III of the Act are also made mandatory for public procurement of buildings, infrastructure and public works.
- ❖ Demand that the mentioned accessibility requirements for products, services and built environment are also mandatory in the implementation of EU funds.
- ❖ Stress that both the public procurement and usage of EU funds oblige authorities to respect accessibility for persons with disabilities, and that the Act helps to comply with this obligation in practice.

10. Enforcement

Member States must ensure that the Act is applied properly by enabling consumers, public bodies, private associations, or other relevant organisations (for example, organisations of persons with disabilities) to go to court (or competent administrative body) in case of breach of the Act (Art. 29.1-Art. 29.2). However, this is not applicable if there is a breach of the law by public bodies (Art. 29.3).



Advice for organisations of persons with disabilities

- ❖ Demand from national legislators:
 - A plan to ensure that persons with disabilities and their representing organisations can take cases to court or relevant administrative body
 - Support to mitigate the inaccessibility, high financial burden, and lengthy procedures of legal action
 - Measures that ensure that persons with disabilities can also take collective legal action in case of breach of the Act by public authorities.

- ❖ Plan ahead on strategic litigation, as organisations of persons with disabilities are entitled by the Act to take an economic operator to Court in case of breach of compliance with this legislation.

11. Penalties

The Act foresees penalties in cases of infringement by economic operators (Art. 30.1). In addition to paying a penalty, economic operators must fix the issue (Art 30.2). To assess the amount of the penalty, the extent of the non-compliance, including its seriousness, the number of non-compliant units of the products, as well as the number of persons affected must be considered (Art 30.4). Public procurers will not be penalised in case of breaching the Act (Art 30.5).

Advice for organisations of persons with disabilities

- ❖ Demand from national legislators that national rules:
 - Clarify how non-compliance and its consequences will be measured. The number of persons is not a sufficient criterion: if one person's life is seriously affected due to inaccessibility it should be considered serious.
 - Identify the appropriate enforcement body with a set methodology and procedures
 - Ensure the enabling conditions (for example, accessibility of consultation procedures, documents) and guarantee for the involvement of your organisations in setting the rules for assessment
 - Include penalties in case of breach of the Act by public authorities.

- ❖ Propose to your government what to do with the money received through penalties. This could be added to the public funding to improve accessibility.



12. Transposition and transitional measures

The provisions on the transposition period for the national governments to adopt and publish the Act are very complicated (Art. 31) and for some of the products and services disproportionately long (Art. 32). As an example: according to the text, the single European emergency number 112 can remain inaccessible until 2027, ticketing machines could remain inaccessible up to 20 years after the entry into use.

The main deadlines are detailed in [Part 1.2](#) of this toolkit and in [our first analysis of the Act](#). It is important to keep in mind that nothing is stopping countries to transpose and implement the Act ahead of the noted deadlines. Same is true for economic operators. They are free to already take note of the coming legal obligation and adjust ahead of time.

Advice for organisations of persons with disabilities

- ❖ Demand earlier deadlines for implementation when possible.
- ❖ Explain that the delays regarding some aspects (for example, accessibility of ticketing machines) reduce the meaningful impact the Act for many persons with disabilities and in some cases (e.g. the European emergency number) put their lives at risk.

13. Report and review

By 28 June 2030, and every five years after that, the European Commission must report about the application of the Act to the European Parliament, to the Council, to the European Economic and Social Committee and to the Committee of the Regions (Art. 33.1). The review will also look at those parts of the Act which are voluntary (for example, requirements for the built environment) and allow exemptions (for example, based on disproportionate burden or fundamental alterations provisions), application in case of public procurement, whether new products and services need to be included in the legislation. Based on the assessment, the Commission may decide to propose new legislative measures to update the Act (Art. 33.2). Member States are required to provide the Commission with all the necessary information to draft this report (Art. 33.3). For this report organisations of persons with disabilities will also be consulted (Art. 33.4).

Advice for organisations of persons with disabilities



- ❖ Discuss with national authorities, which bodies will carry out monitoring and how it will be done specifically.
- ❖ Exercise your right to be consulted or involved by your national authorities when carrying out the monitoring and reporting exercises. This will ensure that the information your country provides to the Commission for reporting will include any issues that affect persons with disabilities in your country.
- ❖ [Request your Member of the European Parliament to raise questions](#) to the Commission to start an infringement procedure if your country does not comply with the Act.
- ❖ Flag any [infringements regarding the implementation of the Act by your country to the Commission](#). You can do this directly [contacting the Commission](#) or through us. Keep us informed when any malfunction on behalf of national regulatory bodies and your government occurs.

14. Annexes:

The Annexes of the Accessibility Act are of utmost importance for the practical implementation of the Act. Whenever there is doubt whether a product or service is accessible according to the Act, you can check the Annexes to see if the relevant product or service complies with them. More detailed description of each Annex is given in the [our analysis of the Accessibility Act](#), which are:

- Annex I: Accessibility requirements.
 - Section I – General accessibility requirements for all products + specific for each product.
 - Section II – General requirements for products of individual use, with the exception of self-service terminals or payment terminals.
 - Section III – General requirements for all services (except urban, suburban and regional transport services).
 - Section IV – Specific requirements for each service.
 - Section V – Specific requirements for the call centres responding and handling emergency calls to the 112 number.
 - Section VI – General accessibility requirements for products and services in public procurement or to prove compliance with another EU legislation accessibility provisions.



- Section VII – Functional Performance Criteria.²⁵
- Annex II: Non-obligatory examples of how to fulfil the accessibility requirements of Annex I.
- Annex III: Non-obligatory requirements for the built environment.
- Annex IV: Procedure for product manufacturers to assess and declare if they comply with the Accessibility Act.
- Annex V: Information service providers must gather to prove they comply with the Accessibility Act.
- Annex VI: Criteria to assess the exemption based on disproportionate burden.

Advice for organisations of persons with disabilities

- ❖ Make sure that the accessibility requirements are translated and included in your national legislation, and propose new ones similar to these for products and services not covered by the Act.
- ❖ You can also propose new requirements (if not available in your country) not covered by the Act, for example, quality standards for audiovisual content access services, such as subtitles for the deaf and hard of hearing, audio description, sign language interpretation and spoken subtitles. The Act does not regulate the quantity of accessible audiovisual content though, as this is related to the transposition of the Audiovisual Media Services Directive.²⁶
- ❖ While we await for the publication of the harmonised standards to prove compliance with the requirements of the Act, for all ICT products and services (including self-service terminals), you can recommend economic operators to follow the [EN 301 549 accessibility requirements for ICT products and services](#) (version V3.1.1).
- ❖ In the case of built environment, you can refer to the first [European Standard for accessibility and usability of the built environment \(prEN 17210\)](#), which will be published soon and provides much more detailed criteria for accessibility of

²⁵ These criteria must be used when the accessibility requirements of the previous sections of Annex I do not address one or more functions of the products and services, or when the criteria result in equivalent or increased accessibility for persons with disabilities. This is particularly relevant for innovative products or services that may have not been included in the scope of the Accessibility Act (e.g. home virtual assistants that can perform tasks of a computer or a telephone).

²⁶ See EDF toolkit on [Audiovisual Media Services Directive \(AVMSD\) \(word\)](#) | [AVMSD pdf version](#) for more detail.



external and internal built environment. Many countries also have national standards, which are quite ambitious, so it is important to reference them in the national rules based on the Act, and make them obligatory.

- ❖ In the case of e-books, you can recommend publishers to follow the industry standard [ePub 3](#) as it already includes the accessibility requirements.
- ❖ As for PSAPs dealing with accessible emergency calls, you can recommend they begin implementing the [Next Generation 112](#) as a means to ensure real time text and total conversation.
- ❖ Recommend to economic operators to apply the European Standard [EN 17161 on Accessibility following a Design for All approach](#), as this will help them achieve greater accessibility outcomes.

15. Other aspects you could advocate for

You can take the opportunity of the Accessibility Act transposition to advocate for other aspects related to accessibility. For example:

- ❖ Call for setting up an independent advisory committee with a clear mandate and funding for experts with disabilities to participate in as part of national regulator responsibilities.
- ❖ Raise awareness on the fact that the Act will contribute to the proper implementation of the European Audiovisual Media Services Directive, European Electronic Communications Code, support EU passengers' rights and rail accessibility legislation, and that it is aligned with the Web Accessibility Directive (meaning that the requirements for websites and mobile applications will be the same for public and private sector).

Final considerations

- **Act now!** It is extremely important that organisations of persons with disabilities at national level get involved and influence the transposition process as soon as possible.
- **Raise awareness.** Organisations of persons with disabilities should also inform their members, persons with disabilities, as well as the general public



about this Act, and what we can expect from it, especially if advocacy actions are planned to put pressure on national governments. Once the Act is in place, organisations of persons with disabilities should inform and encourage persons with disabilities to make use of the feedback and complaint mechanisms in the legislation when they come across inaccessible products and services.

- **Support the industry.** It is also advisable to already start dialogue with web developers, manufacturers of ticketing machines, and other private companies and their representative organisations. They must properly understand the requirements and the reasons why the Act needs to be transposed well. A collaboration with industry can be a win-win situation.

Reference Documents

A. Legal Documents

- [United Nations Convention on the Rights of Persons with Disabilities \(UN CRPD\)](#)
- [General comment No. 2 \(2014\)](#) of Committee on the Rights of Persons with Disabilities on Article 9: Accessibility of UN CRPD
- **European Accessibility Act:** [Directive \(EU\) 2019/882](#) of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services
- **Public Procurement Directive:** [Directive 2014/24/EU](#) of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC
- **Public Procurement Directive for water, energy, transport, and postal services:** [Directive 2014/25/EU](#) of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC Text with EEA relevance
- **European Electronic Communications Code:** [Directive \(EU\) 2018/1972](#) of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)Text with EEA relevance
- **European Audiovisual Media Services Directive (AVMSD):** [Directive \(EU\) 2018/1808](#) of the European Parliament and of the Council of 14 November



2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities

B. Standards and guidelines²⁷

- [Draft European Standard on accessibility and usability of the built environment \(prEN 17210\)](#)
- [European Standard ‘Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users’ \(EN 17161:2019\)](#)
- [\(Harmonised\) European Standard on Accessibility requirements for ICT products and services \(EN 301 549 V3.1.1 \(2019-11\)\)](#)
- [ISO/IEC TS 20071-21:2015 Information technology — User interface component accessibility — Part 21: Guidance on audio descriptions](#)
- [ISO/IEC 20071-23:2018 Information technology — User interface component accessibility — Part 23: Visual presentation of audio information \(including captions and subtitles\)](#)
- [ISO/IEC TS 20071-25:2017 Information technology — User interface component accessibility — Part 25: Guidance on the audio presentation of text in videos, including captions, subtitles and other on-screen text.²⁸](#)
- [EPUB 3 Accessibility Guidelines](#)
- [Irish National IT Accessibility Guidelines](#)

C. Useful contacts

- [European Commission, DG Employment, Social Affairs and Inclusion](#)
- [The European Consumer Organisation member contact](#)
- [European Network of Equality Bodies](#)
- [European Network of National Human Rights Institutions \(ENNHRI\)](#)

²⁷ Please note that standards and guidelines listed in this section are largely indicative. To demonstrate compliance with the Act and achieve its goals upcoming harmonised standards and technical specifications for the Act should be used.

²⁸ Publication of similar standards for Easy to Read, and Sign Language Interpreting for TV are pending.



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