# Logo of the European Disability Forum

Standardisation for the European Accessibility Act (EAA)

European Disability Forum

| June 2021

**Recommendations for EAA Standardisation**

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# Introduction

### The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

# EDF Recommendations for the European Accessibility Act Standardisation Request

In this document we summarise our main recommendations on the European Commission’s standardisation request for the European Accessibility Act (EAA[[1]](#footnote-1)):

* In relation to the EAA revision of several European standards are needed, as well as new ones to be mandated, for example:
	+ Revision of harmonised standard EN 301 549 on Accessibility requirements for ICT products and services
	+ Revision of the EN 17210 on accessibility and usability of the built environment
	+ Revision or potential use of clauses of EN 17161 on ‘Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users’
	+ Other potential standards not covered by these – for example, non-digital information, easy-to-read, interoperability between mainstream and assistive technologies, transport interoperability, communications to the single European emergency number ‘112’, access services for audiovisual media, among others.
* For more inclusive, accessible and effective standardisation we note that:
	+ In addition to including representatives from European user organisations, the EC’s request should encourage an EN 17161 approach to systematic user participation in the relevant processes - both when it comes to the EU and national-level standardisation committees’ work and fulfilling the standard’s requirements.
	+ National standardisation bodies should ensure that user organisations, including organisations of persons with disabilities (DPOs), have equal level of engagement and weight in decision-making as other stakeholders, not least by removing cost and accessibility barriers to this involvement and ensuring voting rights in committees.
	+ Cost barriers for consumer organisations, including DPOs are especially high. Many standards which consumers contribute to need to be purchased once they are published, and can cost a few hundred Euros. For example, recently published EN17210 costs €187.00 (exl. VAT) in Belgium (NBN EN 17210). It is therefore not possible for an individual consumer to check if a product or service they use is in conformity with a relevant standard or not. Non-profit organisations cannot assess the quality of a standard either without having access to the full, final text. The EC should address this barrier and ensure that consumer organisations, including DPOs, have free access to relevant EAA harmonised standards once they are published.
	+ The EC to request to the Technical Committee(s) responsible for drafting the standard(s) should have clear and agreed Terms of References which reflect the points above. The Terms of Reference should be agreed when there are different ESOs jointly working on a standard (e.g. ETSI and CEN/CENELEC).
* Finally, we note and welcome the possibility given by the EAA to the EC to prepare Technical Specifications in cases related to interoperability matters, or under certain conditions.

# Related Documents

1. [UN Convention on the Rights of Persons with Disabilities (UN CRPD)](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html)
2. [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 (Text with EEA relevance))](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882)
3. [EDF European Accessibility Act Toolkit for transposition](https://www.edf-feph.org/publications/eaa-toolkit/)
4. [Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2021%3A101%3AFIN&qid=1614872097963)
5. [Council of Europe’s Common European Framework of Reference for Languages](https://www.coe.int/en/web/common-european-framework-reference-languages/level-descriptions)

# Document credits

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1. We have provided similar input to the feedback provided by SAGA (CEN/BT/WG 213, Strategic Advisory Group on Accessibility). [↑](#footnote-ref-1)