

EDF welcomes the European Commission's draft standardisation request in support of the European Accessibility Act

EDF welcomes the formal notification by the European Commission to the European standardisation organisations and European stakeholder organisations in relation to the development of the Accessibility Act standards. With this, the Commission has published the final [draft standardisation request for developing harmonised standards in support of the European Accessibility Act \(Directive \(EU\) 2019/882\)](#) after consulting relevant stakeholder organisations, including organisations of persons with disabilities.

As part of the consultation leading to the publication of the Commission's draft request, we had sent our official position to the European Commission. [This reflected the aspects we supported in the Commission's initial draft and what we would like further improved.](#)

We welcome the Commission proposal to request six standards, including the revision of the three European standards on accessibility resulting from previous requests. These are the EN 301 549 on accessibility requirements for ICT products and services, the EN 17210 on accessibility and usability of the built environment, and the EN 17161 on accessibility following a design for all approach. In addition to these three revisions, the Commission requests the development of three new standards. These will be (a) harmonised standard(s) setting up requirements on the accessibility of non-digital information related to products, a harmonized standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services), and a harmonized standard for the accessibility and interoperability of emergency communications and for the answering of emergency communications by public safety answering points (PSAPs), including to the single European Emergency number 112. We applaud the new additions making clear the importance of ensuring interoperability, including for electronic communications and emergency communications with the single European Emergency number 112. We therefore believe this overall plan should be kept in the final standardisation request.

We are happy to see that our feedback is well reflected in the final draft request. Especially aspects related to ensuring inclusiveness of the standardisation work for persons with disabilities and their representative organisations by European Standardisation Organisations is commendable. The draft request explicitly calls on to ensure accessibility of the work processes, meetings venues and documents and that reasonable accommodation is provided when requested (article 2.4). Recital 27 further notes that this should be included in the Terms of Reference of the Technical Committees that undertake this standardisation work.

Recital 29 specifies that final deliverables of the standardisation work should be available by the application date of the relevant provisions of the Accessibility Act. This helps clarify timelines and avoid unduly delays in availability of the standards

which will support implementation of the Act. We add that, given many businesses will start the process of ensuring accessibility of their products and services in advance to make sure they meet the legal requirements of the Act when it starts to apply, the development of the harmonised standards should be completed as soon as reasonably possible before the official deadlines set by the European Commission's standardisation request.

We regret that our recommendation to extend provisions in relation to inclusiveness of the EAA standardisation process to national mirror committees is not reflected in the European Commission's final draft request. In fact, many of the participation barriers organisations of persons with disabilities (DPOs) and accessibility experts face are at national level. Other requests to exempt DPOs from participation fees, giving stronger say with voting rights, and requiring reporting by standardisation organisations on inclusiveness of the standardisation work also were not taken on.

A major drawback of the final draft request concerns removal of requesting that standards harmonised for the Accessibility Act are free of charge. The initial position of the European Commission had in fact included the requirement of making them free of charge for non-profit organisations. EDF had supported this call and recommended that it further be extended to all types of organisations, arguing that availability of free of charge standards for everyone would support their wide use by stakeholders, including businesses who provide services and products in the EU. Earlier this year, [we had called on the European Commission and European Standardisation Organisations to make European standards developed by public funding free of charge for non-profit organisations](#).

Reference documents

- [European Commission's notifications on draft standardisations requests to the European standardisation organisations for developing harmonised standards in support of the European Accessibility Act \(Directive \(EU\) 2019/882\)](#)
- [EDF Position Paper on European Commission's initial draft Standardisation Request for the European Accessibility Act](#)
- European Accessibility Act (Act) [toolkit](#) and [webinar](#)
- [EDF-ANEC webinar on introduction to standardisation](#)

Contact

Mher Hakobyan, EDF Accessibility Officer (mher.hakobyan@edf-feph.org).

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.