



To: Cédric O
State Secretary of Digital Transition and Electronic Communications
Cc: Sophie Cluzel,
State Secretary on persons with disabilities

Brussels, 9 March 2022
Ref. EDF-22-18-YV-BP-MH

Re: Ensuring accessibility of online platforms for persons with disabilities under the Digital Services Act and the Digital Markets Act

Dear State Secretary,

We, the European Disability Forum as the umbrella organisation of disabled persons' organisations in the EU, and our member, Conseil Français des personnes Handicapées pour les affaires Européennes et internationales (CFHE), are contacting you concerning the ongoing triologue negotiations on the Digital Services Act (DSA) and Digital Markets Act (DMA).

We call on the Council of the EU to support the European Parliament's position as regards to ensuring accessibility requirements for online platforms under the DSA ([Amendment 255 - Article 19 a \(new\)](#)) and the DMA ([Amendment 134 - Article 7 – paragraph 1](#)).

The proposed amendments will ensure that online platforms, which are essential services for digital participation and for accessing and sharing information, create content, working, traveling, studying, enjoying leisure, are also accessible for 100 million persons with disabilities in Europe. Additionally, guaranteeing an adequate level of accessibility also has important implications in relation to consumer choice, privacy, data protection, protection from online hate speech, unwanted advertising, control over recommender systems, protection from illegal goods and products, and cybercrimes such as scams.

We would like to remind the EU legislators that ensuring accessibility of all information and communication technologies is a legal obligation for the EU and all Member States as State Parties to the UN Convention on the Rights of Persons with Disabilities (article 9 – accessibility, CRPD).

We believe the Parliament position ensures legal coherence as for accessibility requirements for digital services, as it refers to Directive (EU) 2019/882 on the accessibility requirements of products and services, also known as the European Accessibility Act. The Accessibility Act does not cover all the services and platforms regulated by the DSA and DMA, therefore we believe that it will benefit both industry and users to have a common set of accessibility requirements for persons with disabilities, while ensuring legal certainty and coherence.



Please see [EDF Position on both regulations](#) for further information. To discuss the issue in more detail, we would like to request a meeting with the representative of the French presidency of the EU involved in the inter-institutional negotiations concerning the DSA and DMA.

Yannis Vardakastanis

EDF President

Bernadette Pilloy

CFHE President

The European Disability Forum (EDF) is an independent NGO that represents the interests of more than 80 million people with disabilities in Europe and promotes the implementation and monitoring of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). We are a unique platform which brings together representative organisation of persons with disabilities from across Europe. We are run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

Conseil Français des personnes Handicapées pour les affaires Européennes et internationales (CFHE) aims to provide a link between France and Europe for disability policies. We actively seek to promote the voice of people with disabilities and their families, in France and in Europe. Our goal is to ensure that relevant legislation is improved to ensure a better inclusion for all.