



Audiovisual Media Services Directive (AVMSD)

European Disability Forum (EDF)

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EDF recommendations for the upcoming AVMSD revision

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Introduction

The European Disability Forum

The European Disability Forum is an independent NGO that advocates for the rights 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.

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Executive Summary

The European Commission will revise the Audiovisual Media Services Directive (AVMSD) at the end of 2026. While this directive has had a positive impact on the disability community, several gaps continue to limit its effectiveness. To truly advance accessibility for people with disabilities, the upcoming revision should:

- Strengthen the wording of paragraph 1 of article 7 to ensure that all audiovisual media service providers, this is public and commercial TV channels and video-on-demand platforms, continuously make their services accessible to persons with disabilities.
- Establish harmonised accessibility requirements for the different access services, supported by European Standard to ensure quality.
- Address the inaccessibility of video-sharing platforms, social media and online news platforms, and ensure accessible content to AVMS providers concerned by article 7.
- Clarify obligations to provide emergency information in accessible formats.
- Strengthen reporting obligations under Article 7 to also include the development of accessibility action plans, the point of contact and accessibility of emergency information.
- Ensure the diversity of accessible content
- Introduce the provision of audiovisual media content in easy-to-understand formats.
- Strengthen cooperation of audiovisual media service providers and regulators with organisations of persons with disabilities.

Audiovisual Media Services Directive (AVMSD)

The Audiovisual Media Services Directive (AVMSD) requires Member States to adopt measures to ensure that audiovisual media service providers make their services “continuously and progressively more accessible” to persons with disabilities (Article 7.1)

The means to achieve this is through the provision of access services to the audiovisual media content such as audio description, sign language interpretation, subtitles for the deaf and hard of hearing and spoken subtitles (Recital 23).

However, the AVMSD grants a high degree of flexibility to Member States. Compared to other EU accessibility legislation, which establish specific and harmonised accessibility requirements across the EU, the AVMSD lacks the following essential elements:

- Specific targets regarding the percentage of accessible audiovisual content.

- Clear timelines to achieve these targets with increases over time, taking into account the starting point of each Member States.
- Quality standards for access services
- Definitions of access services for audiovisual content.
- Accessibility requirements for video-sharing, social media platforms and online news platforms.
- Obligations to involve persons with disabilities.

This situation has resulted in divergent approaches to media accessibility which, in EDF view, limit the Directive's impact on the disability community.

Some of these fears were already highlighted in [2021 ERGA report on Article 7.1](#). They have since been confirmed by more recent reports, including that of the [Commission \(2024\)](#) and the [European Audiovisual Observatory \(2023\)](#). More recently, in [its 2025 concluding observations to the EU](#), the UNCRPD Committee concluded that *'The Audiovisual Media Services Directive lacks timelines and targets for implementation and does not ensure the accessibility of video-sharing platforms, social media and the audiovisual sections of news websites'*.

In the last years there have been important changes in the way people consume audiovisual services. While linear television – where accessibility obligations are traditionally stronger - is still relevant, an increasing amount of people access audiovisual media content through video-on-demand platforms, video-sharing platforms, websites of newspapers and social media.

While video-sharing platforms and social media promote mainly user generated content, traditional broadcasters and other big organizations – subject to accessibility obligations in other areas - also use them to make their content available.

Unfortunately, existing EU legal framework fails to address this reality¹, leaving certain audiovisual content outside of their scope, irrespective of who publishes it.

The European Commission is currently evaluating the implementation of the AVMSD and plans to present a proposal for its revision by the end of 2026. EDF supports a comprehensive revision of the AVMSD, including Article 7.1, that advances accessibility for people with disabilities. The upcoming revision should address the

¹ Audiovisual Media Services Directive (AVMSD), Web Accessibility Directive (WAD), European Accessibility Act (EAA) and Digital Services Act (DSA).

following points:

Harmonised accessibility requirements

Due to the lack of harmonised accessibility requirements in the AVMSD, available data shows that:

- **Few Member States have established mandatory quota systems.** [According to the Audiovisual Media Observatory report](#), only 16 Member States (MS) reported the introduction of obligations requiring a certain proportion of programs accessible².
- **Accessibility obligations vary depending on the type of media service provider**³. In general, they are higher for - or only applicable to - public broadcasters, while obligations for private broadcasters and video-on-demand platforms are weaker or non-existent⁴.
- **Lack of equity in the use of different access services**⁵. Certain access services are prioritized over others, discriminating among different disability groups. In general, pre-recorded subtitling is more prevalent than audio description, sign language interpretation, live subtitling and spoken subtitles.

EDF recommendation for the AVMSD revision (I)

The AVMSD must stop relying on general duties of progressive improvement and should promote measurable and enforceable minimum accessibility obligations, including concrete targets specifying with clear timelines the percentage of audiovisual content to be made accessible for each type of access service. These targets should take into account the level of media accessibility in each Member State and increase over time.

² See p15.

³ [According to the 2023 Audiovisual Media Observatory Report](#) (p14), linear TV is the main group regulated. 16 MS have stricter obligations for public broadcasters and 7 MS regulate Video-on-demand platforms separately. Out of the 16 Member States (MS) that impose quotas, only 7 have them on video-on demand platforms, 11 apply different quotas for public and private broadcasters and 3 MS only have quotas for public broadcasters.

⁴ [The report Monitoring language diversity and accessibility of streaming platforms in Europe](#) (2023) concludes that (in video on demand platforms) *Audio description is scarce in all languages, but especially in languages other than English. The lack of audio description hinders access to cultural products to people with visual impairments and may thus be interpreted as discriminatory in nature.*

⁵ [According to ERGA Report](#) (p13), While 17 MS oblige to use one or more access services, 9 have total discretion. When it comes to quotas, the [Audiovisual Media Observatory Report](#) (p15) shows that 15 MS have quotas for subtitling, 11 MS for sign language, 9 MS for audio description and only 4 MS for spoken subtitles.

In addition, the revised AVMSD should ensure a balanced legal framework for all access services so that compliance does not become overly dependent on one access service alone. A regulatory model that delivers accessibility primarily for one disability group, while leaving other groups with limited or inconsistent access, should be regarded as insufficient.

Quality considerations in the provision of access services

The mere provision of access services does not automatically guarantee accessibility. For example, subtitles that are not specifically designed for deaf and hard-of-hearing persons, audio description that is not delivered by trained professionals, or a sign language interpreter that is not qualified may fail to ensure effective access. In addition, both opportunities and challenges arise with the use of Artificial Intelligence (AI) for the provision of accessibility (for example, to produce automatic captions). When it comes to access services, quality considerations ensure that the content is as accessible as possible to the end-user.

[According to ERGA 2021 report](#)⁶, very few Member States (MS) appear to have introduced qualitative obligations: 8 MS for linear broadcast and 4 for on demand. The [Audiovisual Observatory Report](#)⁷ goes further, indicating that only a limited number of MS have a code of best practice or quality assurance document for access services (5 MS for subtitling, 3 MS for sign language and 4 MS for audio description).

EDF recommendation for the AVMSD revision (II)

Following the practice for other accessibility-related legislation, such as the European Accessibility Act, the Web Accessibility Directive, the European Commission should request the development of European Standards on Access Services⁸ as an action under the EU Disability Strategy. Such standards would establish the minimum level of quality of required access services and support countries in which there is no quality guidance.

⁶ See page 15.

⁷ See page 18.

⁸ Currently there are International and National Standards, but no European Standards.

Diversity of content made accessible

The [Audiovisual Media Observatory Report](#)⁹ shows that only 7 MS regulate the time of broadcast of accessible content, 11 regulate the type of content to be made accessible and 8 focus on news and current affairs programs. This leads to situations in which the accessible content is scheduled late at night or extremely early in the morning, when the audience reach is minimal.

Beyond the provision of access services, it is important to ensure the availability of accessible content across all kinds of programming, including programs for children, sports, culture or movies¹⁰.

In addition, accessible content should include disability led and produced programs. For instance, beyond sign-language interpretation, deaf-led programs with deaf presenters, journalists and content creators can ensure that the content is delivered in the mother tongue of the deaf audience, by deaf professionals in a culturally appropriate way.

EDF recommendation for the AVMSD revision (III)

In the revised AVMSD, accessibility obligations should extend beyond the mere existence of accessible content and include reasonable requirements concerning scheduling, prominence, diversity, labelling, searchability and discoverability, so that accessible content is available in practice and not only in theory. Organisations of persons with disabilities should be involved when prioritizing the programmes to be made accessible. Member States should support and encourage the creation of content delivered directly by persons with disabilities themselves.

Video-sharing platforms, social media and online news portals

Video-sharing platforms and social media are increasingly used to consume audiovisual content. In 2025, the [United Kingdom's \(UK\) Audiovisual Regulator](#) (Ofcom) concluded that YouTube was the second most-watched media service in the country, only after the BBC. Similarly, the [European Parliament's Media and News 2023 Survey](#) found that while TV dominates as

⁹ See page 11.

¹⁰ For further information, check [the European Union of the Deaf \(EUD\) Report on the implementation of the AVMSD](#) (pages 16-18) or the [EBU report on Access Services and PSM 2025](#) at page 26.

primary news source for citizens, the use of social media platforms to access news has seen the most important increase.

Although these types of platforms are increasingly used for the distribution of media content, including by traditional broadcasters, neither the AVMSD nor the Digital Services Act (DSA) regulate their accessibility¹¹.

EDF recommendation for the AVMSD revision (V)

At a platform level, the AVMSD should require platforms to make accessibility tools available free of charge and by default¹². Platforms should raise awareness on accessibility and offer trainings for content creators. Platforms themselves should also be required to follow EU harmonised legislation, particularly the European Accessibility Act, to make sure that their websites and apps are accessible to end-users with disabilities.

At a media provider level, the AVMSD should make sure that organisations that are already subject to accessibility obligations when using linear and on demand television, are also required to make their content accessible when distributed through third-party platforms.

Finally, the AVMSD should extend its scope to also include online media platforms within their scope, as they increasingly use audiovisual content within their websites.

Provision of content in easy-to-understand formats

Easy to understand language is a format that provides greater access to people with intellectual disabilities or people who might have difficulties in understanding certain information¹³. While it is not required by the AVMSD, some Member States are already implementing easy to understand measures in the audiovisual media. For example, Austria requires the Austrian Broadcasting Corporation (ORF) to provide, at least, one news broadcast in plain language between 9.00 and 22.00h¹⁴. In certain

¹¹ Article 47 of the DSA encourages the use of accessibility codes of conduct, but they are not mandatory.

¹² Not requiring the user to activate them, as it is currently the case in some social media platforms.

¹³ For more information check [Inclusion Europe's standards on easy to read](#).

¹⁴ For more information check [Austria's transposition fiche](#) prepared by the European Audiovisual Observatory.

situations, easy to read formats is also needed (for example, for the provision of written information).

EDF recommendation for the AVMSD revision (VI)

The revised AVMSD should recognise easy-to-understand audiovisual content as an essential accessibility measure, particularly in relation to news, public interest content, emergency communication and other information necessary for civic participation and independent decision-making. To that end, the AVMSD should expand the definition of access services to easy-to-understand and clarify that the development of audiovisual content in this format should involve people with intellectual disabilities. When necessary, information in easy-to-read formats should be also required.

Accessibility of emergency information

Accessibility of emergency information, including public communications and announcements during natural or human-made disaster situations, is extremely important for persons with disabilities. Despite being an obligation under the AVMSD, the available data shows that Member States could do better to ensure that emergency information is provided in an accessible manner. According to the [Audiovisual Media Observatory Report](#),¹⁵ only 21 Member States require this in their legislation and 5 allow audiovisual media broadcasters to do it to ‘the best’ of their ability. Similarly, [the 2025 report by the European Broadcasting Union](#) shows that only 49% of public sector media (PSM) have defined some rules and recommendations to provide access services in case of emergency content.

EDF recommendation for the AVMSD revision (IV)

The AVMSD revision should clarify minimum accessibility obligations for the application of Article 7(5) on the provision of emergency information and require media service providers to report to the national regulatory authorities on how they implement this article. Obligations could include the provision of live subtitles¹⁶ for the deaf and hard of hearing, sign language interpretation, audio description, spoken subtitles and easy-to-understand language. Pre-defined emergency protocols and

¹⁵ See page 25.

¹⁶ Access services should be provided live at the same time as the general audience not at a later stage.

pre-recorded videos and accessible content should also be foreseen when immediate warning must be disseminated.

Stronger cooperation with organisation of persons with disabilities

While the motto of the disability movement is clear, nothing about us without us, the conclusion of the [Audiovisual Media Observatory](#)¹⁷ sheds light in a worrisome reality: few member states have committed to engaging with disabled persons organisations to ensure best practice or issue guidelines for making audiovisual content accessible. For example, only 7 MS oblige that the action plans to be developed by media service providers are developed in consultation with organisations representing persons with disabilities.

Feedback from users is equally important to improve the quality of audiovisual content. Unfortunately, despite being an obligation under the AVMSD, only 5 MS states have set up a specific point of contact for accessibility complaints and information. The rest have established a general complaint mechanisms that includes disability¹⁸

EDF recommendation for the AVMSD revision (VII)

Consultation with organisations of persons with disabilities should be mandatory by all stakeholders, including National Regulatory Authorities, broadcasters and on-demand platforms and at all relevant stages, including the preparation of accessibility action plans, the setting of priorities, the development of quality guidance, the handling of complaints and the implementation of accessibility measures.

The National Regulatory Authorities should improve their complaint mechanisms so end-users with disabilities know where to complain in an accessible manner. Authorities should also provide feedback on how complaints support their enforcement activities, so users have incentives to complain.

Audiovisual Accessibility beyond access services

The level of audiovisual accessibility not only depends on the provision of access

¹⁷ See page 20.

¹⁸ See page 23 of the [Audiovisual Media Observatory Report](#).

services, but also on the format used for the delivery of the content. Some additional barriers end-users with disabilities can experience include:

- Flashes, sudden changes in light intensity, rapid sequences of images that may trigger epileptic seizures, migraines or discomfort in photosensitive individuals.
- Unnecessary moving of decorative elements, that increase cognitive load for people with developmental disabilities, such as autism.
- Size of images and relevant content in proportion to the screen space they occupy.
- Font size and font weight for clear visibility on screen.
- Lighting and contrast between different elements in the audiovisual content.
- Clarity and volume of voices, especially in relation to background noise and / or music.

Document credits

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