



Accessibility guidelines for public libraries – European Accessibility Act

Alejandro Moledo, EDF New Technologies and Innovation officer
IFLA LPD Symposium, Brussels, 28 February 2018

About the European Disability Forum

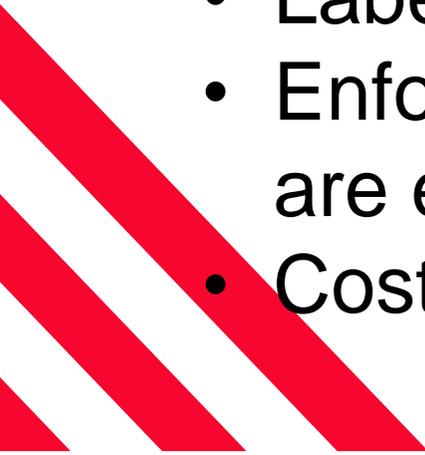
- Umbrella organisation
 - 80 million Europeans with disabilities in Europe (15% EU population)
 - Organisation **of** persons with disabilities, **run by** persons with disabilities
 - Fight against discrimination and promote the Human Rights of persons with disabilities
 - Full implementation of the UN Convention on the Rights of Persons with disabilities
 - Advocacy organisation at European level
 - Closely work with the European Union, the Council of Europe and the United Nations
- 

UN Convention on the Rights of Persons with Disabilities (UNCRPD) & accessibility

- 1st International Human Rights Treaty addressing ICT
- Ratified by the EU in 2010, and 27 Member States
- Article 3: Accessibility as a General Principle
- Article 9 on Accessibility “on an equal basis with others”, including to ICT
- Article 21 on Freedom of expression
- Article 30 on Participation on cultural life

See: [CRPD Committee General Comment n° 2](#)

Accessibility

- Non-discrimination
 - Beneficial to all
 - Is not black or white (nor a backyard entrance!)
 - Soft approach to accessibility failed
 - Accessibility is not sufficiently addressed in national legislations in many EU countries
 - Legislation is essential and standards are needed, including on quality aspects
 - Labels and raising awareness help
 - Enforcement, monitoring and redress mechanism are essential
 - Cost-effective when incorporated from the outset
- 

European Accessibility Act

UN CRPD Article 30. Participation in cultural life:

“1. States Parties recognize the right of persons with disabilities to take part on an equal basis with others in cultural life, and shall take all appropriate measures to ensure that persons with disabilities: (a) Enjoy access to **cultural materials in accessible formats;**

”



Proposal for a European Accessibility Act

- Directive with legal base of Internal Market
 - Mainstream products and services covered
 - Disproportionate burden and fundamental alteration
 - Use of harmonised standards (like the [EN 301 549](#)) or Common Technical Specifications
 - Implementation and enforcement mechanisms by market surveillance authorities
 - CE marking
 - Functional specifications (accessibility requirements)
- 

Scope of the European Accessibility Act

- Computers and operating systems
- ATMs, ticketing and check-in machines
- Telephony services and smartphones
- Audiovisual media services and TVs
- Services related to air, bus, rail and waterborne passenger transport
- Banking services
- e-books
- e-commerce

Complementing other EU legislations:

- Public Procurement Directive
- Structural Funds
- Trans-European Transport Networks

EDF position

- Crucial step towards end-to-end accessibility
 - Limited scope: Built environment, transport, household appliances
 - Clarification of exemptions (Art. 12)
 - Participation of Disabled Persons' Organisations (DPOs)
 - More robust and clearer accessibility requirements
 - Complementing sectorial legislation on **how** to fulfil their accessibility provisions
- 

Parliament position adopted on September 14

- Blanket exemption of microenterprises
 - Audiovisual Media Services out (only webs and mobile apps). TV specific requirements as examples
 - Reinsertion of the link to other Union Acts
 - Inclusion of built environment when new or substantially renovated
 - Broadened scope for transport services
 - Enhanced enforcement mechanism
 - **Inclusion of e-book readers**
- 

Accessibility requirements for e-books (1/2):

- Products (e-readers) shall comply with accessibility requirements for ICT
- Information about the functioning of the service and its accessibility characteristics (metadata)
- Content information
- Websites
- Information on complementarities with assistive services



Accessibility requirements for e-books (2/2):

- “... ensuring the navigation throughout the document, such as by means of dynamic layouts, the possibility to synchronize text and audio content, text-to-speech technology, allowing alternative renditions of the content and its interoperability with a variety of assistive technologies, in such a way that can be perceivable, understandable, operable and maximizes compatibility with user agents”.
- In other words → [ePub 3.0 standard](#)

Council position adopted in December 7

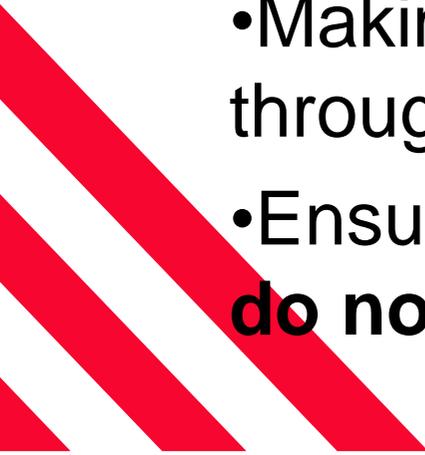
- Removal of the link to other Union acts (public procurement, EU structural funds, etc.)
- Removal of built environment
- Exemption of microenterprises providing services (including e-books)
- Removal of requirements for emergency centers
- Deteriorations on the scope for transport services and self-service terminals
- **Inclusion of e-book readers**

Accessibility requirements for e-books (1/2):

- Products (e-readers) shall comply with (**more robust**) accessibility requirements for ICT
- Information about the functioning of the service and its accessibility characteristics (metadata)
- Content information
- Websites **and applications**
- Information on complementarities with assistive services



Accessibility requirements for e-books (2/2):

- Ensuring that, when an e-book contains audio in addition to text, it then provides **synchronised text and audio**;
 - Ensuring that e-book digital files do not prevent **assistive technology** from operating properly;
 - Ensuring **access** to the content, the **navigation** of the file content and layout including dynamic layout, the provision of the structure, **flexibility** and choice in the presentation of the content;
 - Making them discoverable by providing information through **metadatas** about their accessibility features;
 - Ensuring that **Digital Rights Management measures do not block accessibility features**.
- 



THANK YOU

For more information please contact EDF Secretariat:
Alejandro Moledo, EDF New Technologies and
Innovation officer alejandro.moledo@edf-feph.org