



EDF proposed amendments to the European Accessibility Act for the EP Plenary

June 2017



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EDF proposed amendments to the European Accessibility Act

The European Disability Forum is an independent NGO that represents the interests of 80 million Europeans with disabilities. EDF is a unique platform which brings together representative organisations 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.

Introduction

EDF welcomed the publication of the legislative proposal for a European Accessibility Act in December 2015 and after a thorough analysis of the content published its [initial position paper](#) in February 2016. In this paper, EDF already expressed deep concerns about the effectiveness of the Act in certain areas and the fact that its potential will not be fulfilled by the proposal as it currently stands. EDF has engaged in an active dialogue with its membership as well as with ANEC, the European consumer voice in standardisation and AGE Platform Europe, the network representing over 40 million older people in Europe in the development of its analysis and would now like to make some concrete suggestions for amendments which you will find below.

EDF's top priorities

Even though all amendments are important, EDF has defined some aspects that are of high priority for the disability movement and will constitute red lines. For EDF, a position of the European Parliament is not acceptable if it does not contain:

- 1) A binding clause on the built environment (Article 3 (10))
- 2) A clear reference to the applicability of the accessibility requirements to other Union acts (Article 1(3))
- 3) Obligations for all businesses, including for microenterprises and SMEs (Art. 12)
- 4) An ambitious and comprehensive Annex I with clear requirements (Annex I)
- 5) Requirements for all transport modes that clearly go beyond existing legislation

For more details and justifications see the listing Article by Article below.



Article 1 - Scope

Commission proposal	EDF amendments
<p>1. Chapters I, II to V, and VII apply to the following products:</p> <ul style="list-style-type: none">(a) general purpose computer hardware and operating systems;(b) the following self-service terminals:<ul style="list-style-type: none">(i) Automatic Teller Machines;(ii) ticketing machines;(iii) check-in machines.(c) consumer terminal equipment with advanced computing capability related to telephony services;(d) consumer terminal equipment with advanced computing capability related to audio-visual media services. <p>2. Chapters I, II to V, and VII, apply to the following services:</p> <ul style="list-style-type: none">(a) telephony services and related consumer terminal equipment with advanced computing capability;(b) audiovisual media services and related consumer equipment with advanced computing capability;(c) air, bus, rail and waterborne passenger transport services;(d) banking services;(e) e-books;(f) e-commerce.	<p>1. Chapters I, II to V, and VII apply to the following products:</p> <ul style="list-style-type: none">(a) general purpose computer hardware and operating systems;(b) the following self-service terminals:<ul style="list-style-type: none">(i) Automatic Teller Machines;(ii) ticketing machines;(iii) check-in machines.(c) consumer terminal equipment with advanced computing capability related to telephony services;(d) consumer terminal equipment with advanced computing capability related to audio-visual media services.(e) household appliances operated by a user interface <p>2. Chapters I, II to V, and VII, apply to the following services:</p> <ul style="list-style-type: none">(a) telephony services and related consumer terminal equipment with advanced computing capability;(b) audiovisual media services and related consumer equipment with advanced computing capability;(c) air, bus, rail and waterborne passenger transport, mobility and their intermodal connection services, including public urban transport such as underground, rail, tramway, trolleybus and bus related to:<ul style="list-style-type: none">(i) self-service terminals, located within the territory of the Union, including ticketing machines, payment terminals and check-in machines;(ii) websites, mobile device-based services, smart ticketing and real-time



<p>3. Chapters I, VI and VII of this Directive apply to the following:</p> <p>(a) public contracts and concessions which are subject to Directive 2014/23/EU Directive 2014/24/EU and Directive 2014/25/EU.</p> <p>(b) the preparation and implementation of programmes under Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund; and Regulation (EU) No 1304/2013 of the European Parliament and of the Council.</p> <p>(c) tender procedures for public passenger transport services by rail and by road under Regulation (EC) No 1370/2007 of the European Parliament and of the Council.</p> <p>(d) transport infrastructure in accordance with Regulation (EU) No 1315/2013 of the European Parliament and of the Council.</p>	<p>information;</p> <p>(iii) vehicles, the related infrastructure and the built environment, including step-free access on all public stations;</p> <p>(iv) Member States shall ensure that, within their territory, fleets of taxis and hire cars include an adequate proportion of adapted vehicles.</p> <p>(da) existing Regulations dealing with transport services in order to achieve greater coherence between them and to include intermodal aspects that are necessary for obtaining barrier-free accessibility; those Regulations shall be the basis for rules on accessibility to transport and mobility services.</p> <p>(d) banking services;</p> <p>(e) e-books;</p> <p>(f) e-commerce, websites of products and services providers, media and news websites, online platforms and social media;</p> <p>(g) tourism services, including the provision of accommodation and catering.</p> <p>3. Chapters I, VI and VII of this Directive apply to the following:</p> <p>(a) public contracts and concessions which are subject to Directive 2014/23/EU Directive 2014/24/EU and Directive 2014/25/EU.</p> <p>(b) the preparation and implementation of programmes under Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund;</p>
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	and Regulation (EU) No 1304/2013 of the European Parliament and of the Council. (c) tender procedures for public passenger transport services by rail and by road under Regulation (EC) No 1370/2007 of the European Parliament and of the Council. (d) transport infrastructure in accordance with Regulation (EU) No 1315/2013 of the European Parliament and of the Council
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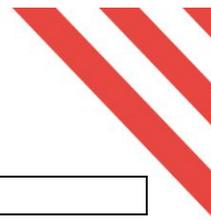
Justification:

The scope as it has been proposed by the European Commission is already very limited compared to what the Disability Movement and other Civil Society Organisations originally asked for and what was supported in the Commission's own Impact Assessment. It is important to widen the scope to make the Act meaningful and to fulfil the obligations under the UNCRPD.

It is also crucial to retain the full link to other Union acts under Art. 1(3) as proposed by the Commission, such as the Public Procurement Directive, the EU Structural Funds, and the Trans-European Transport Networks Regulation (TEN-T). The Act does not actually create any new obligations because the above mentioned laws already have criteria on accessibility. Therefore, it is even more important that the Accessibility Act fills these criteria with meaning and facilitates implementation and enforcement on national level. The requirements should apply to ALL products and services and not just to those limited under the scope of the Act. This has also been supported by the industry (see joint statement of EDF and Digital Europe)

This Directive has the potential to make sure that technological breakthroughs adopt a Universal Design approach that come up with new accessible products. In many surveys among persons with disabilities, one of the mostly mentioned inaccessible products in their everyday lives is household appliances. With the up-and-coming Commission initiative on the Internet of Things and smart appliances, people can control the functioning of different household devices through a hub (like a smartphone or touch screen) with a user interface that facilitates the communication between the person and the machine. Given the existing requirements for accessible user interfaces, EDF believes that this can be the moment to make these upcoming products more accessible.

- IMCO AM 70 on AVSMD should be deleted.
- TRAN opinion AM 32 on transport services should be proposed instead of IMCO AM.
- IMCO AM 77 on transport should be deleted.
- TRAN opinion AM 33 on tourism should be added.



Article 1 a (new)

Text proposed by the Commission

Amendment

~~Article 1a~~

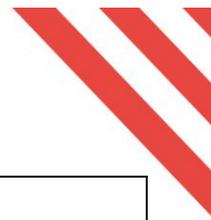
~~Exclusion of microenterprises~~

~~This Directive does not apply to microenterprises that manufacture, import or distribute products and services that fall within its scope.~~

AM 80 of the IMCO report should be deleted

Article 2 – Definitions

Commission proposal	EDF amendments
<p>For the purposes of this Directive, the following definitions shall apply:</p> <p>(2) “universal design” referred to also as “design for all” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design; “universal design” does not exclude assistive devices for particular groups of persons with functional limitations, including persons with disabilities where this is needed;</p> <p>(3) “persons with functional limitations” means persons who have any physical, mental, intellectual or sensory impairment, age related impairment, or other human body performance related causes, permanent or temporary, which in interaction with various barriers result in their reduced access to products and services, leading to a situation that requires adaptation to their particular needs of those products and services;</p>	<p>For the purposes of this Directive, the following definitions shall apply:</p> <p>(2) “universal design” referred to also as “design for all” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design; “universal design” does not exclude assistive devices for particular groups of persons with functional limitations, and persons with disabilities where this is needed;</p> <p>(3) “persons with functional limitations” means persons who have any physical, mental, intellectual or sensory impairment, reduced mobility (PRMs), age related impairment, or other human body performance related causes, permanent or temporary, which in interaction with various barriers result in their reduced access to products and services, leading to a situation that requires adaptation to their particular needs of those products and services;</p>



<p>(21) “e-commerce” means the online sale of products and services.</p>	<p>(21) “e-commerce” means the online sale of products and services, including any third party elements needed for the provision of the online sale.</p> <p>(21a) "air passenger transport services" means services provided by air carriers, tour operators and the managing bodies of airports as defined in points (b) to (f) of Article 2 of Regulation (EC) No 1107/2006 of the European Parliament and of the Council^{1a};</p> <p>(21b) "bus passenger transport services" means services covered by Article 2(1) and (2) of Regulation (EU) No 181/2011;</p> <p>(21c) "rail passenger transport services" means all rail passenger services covered by Article 2(1) and (2) of Regulation (EC) No 1371/2007;</p> <p>(21d) "waterborne passenger transport services" means passenger services covered by Article 2(1) of Regulation (EU) No 1177/2010.</p> <p>(22) (new) “banking service” means all banking services.</p>
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Justification:

EDF agrees with the Commission proposal to use the broader term “persons with functional limitations” in addition to the term “persons with disabilities” to illustrate that accessibility benefits a much wider part of the population. Especially older people, who often also have disabilities, are covered under this term.

Furthermore, this is in line with the Commission’s use of the term “persons with reduced mobility” which is equally broad and already used on the EU passengers’ rights legislation.



Finally, one has to keep in mind that older people are a big and every growing group of persons concerned by the Accessibility Act and their disabilities are by no means only temporary. Therefore, the term “persons with functional limitations” should also remain under the definitions in Art. 2. The proposed text is taken from AM 40 of the adopted TRAN opinion of 9 May 2017. The definitions of transport services that were added in the IMCO report in AMs 89 – 92 and should be deleted. They significantly narrow the scope of the Act and refer to the definition of passengers’ rights legislation which is not at all related to accessibility and therefore in this context not sufficient.

Banking services should not just be reduced to using payment accounts with “basic features” within the meaning of Directive 2014/92/EU of the European Parliament and of the Council as proposed in the IMCO report (AMs 71 and 87).

Defintion of “universal design” was deleted in the IMCO report (AM 82) and it should be re-established.

Article 3 – Accessibility Requirements

Commission proposal	EDF amendments
<p>5. Audiovisual media services and the related consumer equipment with advanced computing capability shall comply with the requirements set out in Section IV of Annex I.</p>	<p>5. Audiovisual media services <i>in pursuant to the measures taken by Member States derived from article 7 of Directive XX/YYYY/EU</i>, and the related consumer equipment with advanced computing capability shall comply with the requirements set out in Section IV of Annex I.</p>
<p>10. Member States may decide, in the light of national conditions, that the built environment used by clients of passenger transport services including the environment that is managed by service providers and by infrastructure operators as well as the built</p>	<p>10. Member States shall ensure, in the light of national conditions, that the built environment used by clients of passenger transport services including the environment that is managed by service providers and by infrastructure operators as well as the built</p>



<p>environment used by clients of banking services, and customer services centres and shops under the scope of telephony operators shall comply with the accessibility requirements of Annex I, section X, in order to maximise their use by persons with functional limitations, including persons with disabilities.</p>	<p>environment used by clients of banking services, and customer services centres and shops under the scope of telephony operators as well as any other service or place for the purchase of any of the products covered by this Directive shall comply with the accessibility requirements of Annex I, section X, in order to maximise their use by persons with functional limitations and persons with disabilities.</p>
<p>Justification</p> <p>The built environment has been identified by the Commission’s own Impact Assessment (p.5) as one of the aspects that is likely to be addressed by diverging national legislation and this Directive should therefore contain mandatory provisions covering the built environment. This will also ensure that only parts of a service (e.g. the ATM) but not the built environment or infrastructure that surrounds it (e.g. stairs leading into the building where the ATM is located) will be accessible. Not making accessibility of the built environment binding will weaken the stance of the entire Act and fails to fulfil Article 9 of the UNCRPD. The proposed text is taken from AM 54 of the adopted TRAN opinion of 9 May 2017.</p> <p>IMCO AM 95 on AVMSD should be deleted and replaced by the text proposed here.</p>	

Article 5 – Obligations of Manufacturers

Commission proposal	EDF amendments
<p>9. Manufacturers shall, further to a reasoned request from a competent national authority, provide it with all the information and documentation necessary to demonstrate the conformity of the product, in a language which can be easily understood by that authority. They shall cooperate with that authority, at its request, on any action taken to eliminate the risks posed by products which they have placed on the market and to ensure compliance with the requirements referred to</p>	<p>9. Manufacturers shall be in the position to provide all the information and documentation necessary to demonstrate the conformity of the product at any given moment, in a language which can be easily understood by that authority. They shall cooperate with that authority, at its request, on any action taken to eliminate the risks posed by products which they have placed on the market and to ensure compliance with the requirements referred to in Article 3.</p>



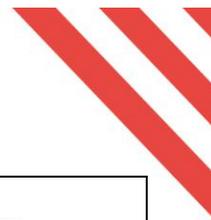
in Article 3.	
<p>Justification:</p> <p>EDF welcomes the fact that the Accessibility Act covers a wide range of economic operators (manufacturers, representatives, importers, and distributors). The Directive should cover all economic operators, both public and private, without exception.</p> <p>It is also important that manufacturers can give information about the conformity of a product at any moment and not just upon request of the authorities, so that consumers can verify the conformity with the accessibility requirements at their own initiative.</p>	

Article 12 – Fundamental alterations and disproportionate burden

Commission proposal	EDF amendments
<p>1. The accessibility requirements referred to in Article 3 apply to the extent that they do not introduce a significant change in an aspect or feature of a product or service that results in the alteration of the basic nature of the product or service.</p> <p>2. Accessibility requirements referred to in Article 3 apply to the extent that they do not impose a disproportionate burden on the economic operators concerned.</p> <p>3. In order to assess whether compliance with accessibility requirements regarding products or services imposes a disproportionate burden, the economic operators shall take account, of the following:</p> <p>(a) the size, resources and nature of the economic operators;</p> <p>(b) the estimated costs and benefits for the economic operators in relation to the estimated benefit for persons with disabilities, <i>taking into account the frequency and duration of use of the specific product or service.</i></p>	<p>1. The accessibility requirements referred to in Article 3 apply to the extent that they do not introduce a significant change in an aspect or feature of a product or service that results in the alteration of the basic nature of the product or service.</p> <p>2. Accessibility requirements referred to in Article 3 apply to the extent that they do not impose a disproportionate burden on the economic operators concerned.</p> <p>3. In order to assess whether compliance with accessibility requirements regarding products or services imposes a disproportionate burden, the economic operators shall take account, of the following:</p> <p>(a) the size, resources and nature of the economic operators;</p> <p>(b) the estimated costs and benefits for the economic operators in relation to the estimated benefit for persons with functional limitations and persons with disabilities.</p>



<p>4. The burden shall not be deemed disproportionate where it is compensated by funding from other sources than the economic operator's own resources, whether public or private.</p> <p>5. The assessment of whether compliance with accessibility requirements regarding products or services imposes a fundamental alteration or disproportionate burden shall be performed by the economic operator.</p> <p>6. Where the economic operators have used the exception provided for in paragraphs 1 to 5 for a specific product or service they shall notify the market surveillance authority of the Member State in the market of which the product or service is placed or made available. Notification shall include the assessment referred to in paragraph 3. Microenterprises are exempted from this notification requirement but must be able to supply the relevant documentation upon request from a relevant market surveillance authority.</p>	<p>4. The burden shall not be deemed disproportionate where it is compensated by funding from other sources than the economic operator's own resources, whether public or private. Lack of priority, time or knowledge shall not be considered as legitimate reasons to claim the disproportionate burden.</p> <p>5. The initial assessment of whether compliance with accessibility requirements regarding products or services imposes a fundamental alteration or disproportionate burden shall be performed by the economic operator.</p> <p>6. Where the economic operators have used the exception provided for in paragraphs 1 to 5 for a specific product or service they shall notify the market surveillance authority of the Member State in the market of which the product or service is placed or made available. Notification shall include the assessment referred to in paragraph 3. The market surveillance authority shall systematically verify the assessment for such an exemption to be granted unless the economic operator has provided an independent third party assessment.</p> <p>7. A structured dialogue shall be established between relevant stakeholders, including persons with disabilities and their representative organisations and the Market Surveillance Authorities to ensure that adequate principles for the assessment of the exemptions are established to make sure they are coherent.</p> <p>8. Member States are encouraged to provide incentives and guidelines to</p>
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	<p><i>Microenterprises to facilitate the implementation of this Directive. The procedures and guidelines shall be developed in consultation with relevant stakeholders, including persons with disabilities and their representative organisations.</i></p>
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Justification:

According to the UN Committee’s General Comment No. 2 (2014) on accessibility, any notion of “disproportionate burden” is unacceptable as a principle. It states that the “obligation to implement accessibility is *unconditional*, i.e. the obliged entity may not excuse the omission referring to the burdens of provision the access for persons with disabilities.”

The text in its current form does therefore not guarantee that economic operators will invest to make their products and services more accessible. EDF fears that this provision will jeopardize the implementation of the proposed Directive as it is not entirely clear what parameters would be used to measure the “disproportionate burden” and how this will be enforced in practice. Involving Disabled Persons’ Organisations directly would guarantee a coherent approach to the exemptions, allowing verification of the use of the exemption by technical experts on accessibility issues.

The best way to guarantee an independent and impartial assessment would be assessment by a third party. However, this is costly and could delay the assessment procedure. In order to make it as easy a possible for the manufacturer, a combination of self-assessment and systematic verification by the Market Surveillance Authority can be the solution.

Finally, it is important that the Market Surveillance Authorities have adequate resources, staff, and knowledge to efficiently verify the assessment of the manufacturer. Stakeholders should also be involved to ensure that the principles, guidelines and benchmarks used for the assessment are coherent and adequate.

AM 126 of the IMCO report exempted SMEs from notification. This should be removed.

Article 14 – Common technical specifications

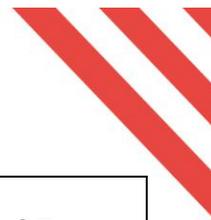
Commission proposal	EDF amendments



<p>2. Products and services which are in conformity with the CTS referred to in paragraph 1 or parts thereof shall be deemed to be in conformity with the accessibility requirements referred to in Article 3, covered by those CTS or parts thereof.</p>	<p>2. Products and services which are in conformity with the CTS referred to in paragraph 1 or parts thereof shall be deemed to be in conformity with the accessibility requirements referred to in Article 3, covered by those CTS or parts thereof.</p> <p>3. Relevant stakeholders, including persons with disabilities and their representative organisations, shall be consulted systematically as part of the procedure for the adoption of implementing acts.</p>
<p>Justification: EDF supports the possibility for the European Commission to publish Common Technical Specifications (CTS). However, this procedure can be a lengthy and complicated one and in order to ensure a good quality outcome, Disabled Persons' Organisations and other relevant stakeholders should be able to provide their views systematically. The proposed text is taken from AM 68 of the adopted TRAN opinion of 9 May 2017.</p>	

Article 15 – EU declaration of conformity of products

Commission proposal	EDF amendments
<p>4. By drawing up the EU declaration of conformity, the manufacturer shall assume responsibility for the compliance of the product.</p>	<p>4. By drawing up the EU declaration of conformity, the manufacturer shall assume responsibility for the compliance of the product.</p> <p>5. In addition to the declaration of conformity, a notice on the packaging shall inform consumers in a simple and precise way that the product incorporates accessibility features.</p>
<p>Justification: EDF endorses the use of CE-marking in general, especially the fact that it obliges the economic operators to adhere to the rules of drawing up the EU declaration of conformity and the related technical file. Even though it is very useful to indicate compliance to the</p>	

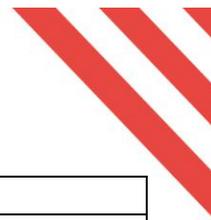


Market Surveillance Authorities, it has some shortcomings especially related to the recognition of accessibility by consumers. Since consumers are used to the fact that CE-marking is already used for the certification of other aspects of a product, such as conformity with the product safety rules, it would be useful to separately indicate to a consumer that the product is also accessible. Therefore, EDF suggests indicating accessibility on the packaging, so that every consumer can check easily which products are accessible without looking at the small print.

Article 17 – Market surveillance of products

Commission proposal	EDF amendments
<p>3. Member States shall ensure that information held by market surveillance authorities concerning the compliance of economic operators with the applicable accessibility requirements set out in Article 3 and the assessment of the exceptions provided for in Article 12, is made available to consumers upon request and in an accessible format, except where that information cannot be provided for reasons of confidentiality as provided for in Article 19(5) of Regulation (EC) No 765/2008.</p>	<p>3. Member States shall ensure that information held by market surveillance authorities concerning the compliance of economic operators with the applicable accessibility requirements set out in Article 3 and the assessment of the exceptions provided for in Article 12, is made available to consumers and in an accessible format.</p>
<p>Justification:</p> <p>Information about non-compliance with the accessibility requirements that is held by the authorities should be made publicly available systematically and not just upon request. Exceptions from this obligations for “reasons of confidentiality” could be misused as information about products can be too easily justified as being commercially sensitive, at least in the development stages of the product.</p>	

Article 19 – Procedure for dealing with products presenting a risk related to accessibility at national level



Commission proposal	EDF amendments
<p>8. Member States shall ensure that appropriate restrictive measures are taken in respect of the product concerned, such as withdrawal of the product from their market, without delay.</p>	<p>8. Member States shall ensure that appropriate restrictive measures are taken in respect of the product concerned, such as withdrawal of the product from their market, without delay.</p> <p>9. To facilitate the exchange of information and best practices amongst the Market Surveillance Authorities and to ensure coherence in the application of the requirements set out in the Directive, the Commission shall establish a working group formed by representatives of the national authorities and the representative organisations of the relevant stakeholders, including persons with disabilities and their representative organisations.</p>
<p>Justification:</p> <p>It is important to involve representative organisations of the relevant stakeholders, including persons with disabilities and their representative organisations, since certain problems and shortcomings are more clearly seen from a consumers' perspective. This will help the Market Surveillance Authorities to better do their work and give them insight in the day-to-day functioning of the procedures. The users' experience is a valuable tool to improve the coherence and the application of the Directive, especially if pan-European organisations are involved that can give a comparative view on what works well in different Member States.</p>	

Article 21 – Applicability of accessibility requirements to other Union acts

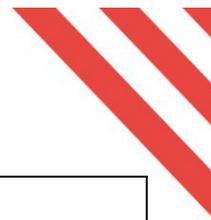
Commission proposal	EDF amendments
<p>(d) To transport infrastructure in accordance with Article 37 of Regulation (EU) No 1315/2013.</p>	<p>(d) To transport infrastructure in accordance with Article 37 of Regulation (EU) No 1315/2013.</p> <p>(da) Where applicable, to all relevant Union legislation or to the provisions in</p>



	<p>Union legislation referring to accessibility for persons with disabilities.</p> <p>(e) Where applicable, all relevant EU legislation or to the provisions in EU legislation referring to accessibility for persons with disabilities.</p> <p>(f) When Union co-financing barrier-free accessible transport and telecommunication infrastructure projects, CEF, cohesion and regional structural funds as well as EFSI should put stronger focus on financial support for these projects.</p>
<p>The paragraph on applicability to all Union acts is taken from the EMPL opinion AM 61. Paragraph (f) on Union co-financing is taken from TRAN opinion AM 71.</p>	

Article 22 – Disproportionate burden

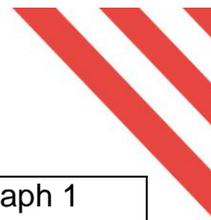
Commission proposal	EDF amendments
<p>1. Accessibility requirements referred to in Article 21 apply to the extent that they do not impose a disproportionate burden on the competent authorities for the purposes of that Article.</p> <p>2. In order to assess whether compliance with accessibility requirements referred to in Article 21 imposes a disproportionate burden, the competent authorities concerned shall take account, of the following:</p> <p>(a) the size, resources and nature of the competent authorities concerned;</p> <p>(b) the estimated costs and benefits for the competent authorities concerned in relation to the estimated benefit for persons with disabilities, taking into account the</p>	<p>1. Accessibility requirements referred to in Article 21 apply to the extent that they do not impose a disproportionate burden on the competent authorities for the purposes of that Article.</p> <p>2. In order to assess whether compliance with accessibility requirements referred to in Article 21 imposes a disproportionate burden, the competent authorities concerned shall take account, of the following:</p> <p>(a) the size, resources and nature of the competent authorities concerned;</p> <p>(b) the estimated costs and benefits for the competent authorities concerned in relation to the estimated benefit for persons with functional limitations and persons</p>



<p>frequency and duration of use of the specific product or service;</p> <p>3. The assessment of whether compliance with accessibility requirements referred to in Article 21 imposes a disproportionate burden shall be performed by the competent authorities concerned.</p> <p>4. Where a competent authority has used the exception provided for in paragraphs 1, 2 and 3 for a specific product or service it shall notify the Commission thereof. The notification shall include the assessment referred to in paragraph 2.</p>	<p>with disabilities;</p> <p>3. The assessment of whether compliance with accessibility requirements referred to in Article 21 imposes a disproportionate burden shall be performed by the competent authorities concerned. Lack of priority, time or knowledge should not be considered as legitimate reasons to claim a disproportionate burden.</p> <p>4. Where a competent authority has used the exception provided for in paragraphs 1, 2 and 3 for a specific product or service it shall notify the Commission thereof. The notification shall include the assessment referred to in paragraph 2 and it shall be made available to the public in accessible formats.</p> <p>5. If the Commission has reasons to doubt the decision of the competent authority concerned, the Commission may request the working group referred to in Article 19.9 to verify the assessment referred to in paragraph 2 and issue an opinion.</p>
<p>Paragraph 2(b) is taken from the TRAN opinion AM 73: It is important to use a wider definition than just “persons with disabilities” because also more people benefit from accessibility features.</p> <p>Paragraph 3 is taken from the EMPL opinion AM 63.</p> <p>Paragraph 4 is taken from the TRAN opinion AM 75.</p>	

Article 25 – Enforcement

Commission proposal	EDF amendments

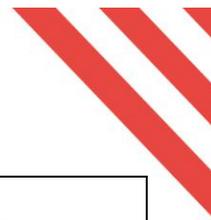


<p>2. The means referred to paragraph 1 shall include:</p> <p>(a) provisions whereby a consumer may take action under national law before the courts or before the competent administrative bodies to ensure that the national provisions transposing this Directive are complied with;</p> <p>(b) provisions whereby public bodies or private associations, organisations or other legal entities which have a legitimate interest, in ensuring that the provisions of this Directive are complied with, may take action under national law before the courts or before the competent administrative bodies on behalf of consumers to ensure that the national provisions transposing this Directive are complied with.</p>	<p>2. The means referred to paragraph 1 shall include:</p> <p>(a) provisions whereby a consumer may take action under national law before the courts or before the competent administrative bodies to ensure that the national provisions transposing this Directive are complied with;</p> <p>(b) provisions whereby public bodies or private associations, organisations or other legal entities which have a legitimate interest, in ensuring that the provisions of this Directive are complied with, may take action under national law before the courts or before the competent administrative bodies on behalf of consumers to ensure that the national provisions transposing this Directive are complied with.</p> <p><i>2b. — This Article shall not apply to contracts which are subject to Directives 2014/24/EU or 2014/25/EU.</i></p> <p>(c) provisions whereby a comprehensive and adequately resourced complaints mechanism for consumers is established to complement a system of implementation and monitoring.</p>
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Justification:

It is positive that the consumer has the possibility to take legal action but the burden of enforcement should not rely on individual actions of consumers but should also be done by an adequately resourced and accessible complaints mechanism. The Market Surveillance Authorities, who will have to be equipped with the necessary expertise and power to do so, could take this role. Individual legal action should only be the last resort considering that many persons with disabilities already have problems accessing the justice system and court proceedings are costly and time-consuming.

AM 162 of the IMCO report on paragraph 2(a) introduces the restriction of “consumers that are directly affected”. This should be deleted because it is not possible to assess clearly who is directly and who is indirectly affected.



AM 166 of the IMCO report on certain contracts introduced this restriction. It should be deleted.

Paragraph 2(c) on the complaint mechanism was taken from the TRAN opinion AM 76.

Article 26 – Penalties

Commission proposal	EDF amendments
<p>1. Member States shall lay down the rules on penalties applicable to infringements of the national provisions adopted pursuant to this Directive and shall take all measures necessary to ensure that they are implemented.</p> <p>2. The penalties provided for shall be effective, proportionate and dissuasive.</p> <p>3. Member States shall, without delay, notify the Commission of those rules and of those measures and shall notify it, without delay, of any subsequent amendment affecting them.</p> <p>4. Penalties shall take into account the extent of the non-compliance, including the number of units of non-complying products or services concerned, as well as the number of people affected.</p>	<p>1. Member States shall lay down the rules on penalties applicable to infringements of the national provisions adopted pursuant to this Directive and shall take all measures necessary to ensure that they are implemented.</p> <p>2. The penalties provided for shall be effective, proportionate and dissuasive, <i>but not serve as an alternative to the fulfilment by economic operators of their obligation to make their products or services accessible.</i></p> <p>2 (a) . Member States shall dedicate the necessary resources to enforce and collect penalties. Funds raised shall be re-invested in accessibility related measures.</p> <p>3. Member States shall, without delay, notify the Commission of those rules and of those measures and shall notify it, without delay, of any subsequent amendment affecting them.</p> <p>4. Penalties shall take into account the extent of the non-compliance, including the number of units of non-complying products or</p>



	<p>services concerned, as well as the number of people affected.</p> <p>4a. The proceeds collected from the imposition of penalties shall be re-invested in accessibility-related measures.</p>
<p>Comments:</p> <p>Paragraph 2 on penalties was taken from the TRAN opinion AM 76.</p> <p>Paragraph 4(a) on the re-investment of penalties was taken from the TRAN opinion AM 78.</p>	

Article 27 – Transposition

Commission proposal	EDF amendments
<p>1. Member States shall adopt and publish, by [... insert date - two years after the entry into force of this Directive] at the latest, the laws, regulations and administrative provisions necessary to comply with this Directive. They shall forthwith communicate to the Commission the text of those provisions.</p> <p>2. They shall apply those provisions from [... insert date - six years after the entry into force of this Directive].</p>	<p>1. Member States shall adopt and publish, by [... insert date - two years after the entry into force of this Directive] at the latest, the laws, regulations and administrative provisions necessary to comply with this Directive. They shall forthwith communicate to the Commission the text of those provisions.</p> <p>2. They shall apply those provisions from [... insert date -</p> <ul style="list-style-type: none"> • 3 years after the entry into force of this Directive for products under Article 1(a) – general purpose computer hardware and operating systems • 5 years after entry into force of this Directive for products under Article 1(b) – self-service terminals • 4 years after the entry into force of this Directive for products under Article 1(c) - Consumer terminal equipment with advanced computing capability related to telephony services



	<ul style="list-style-type: none">• 4 years after the entry into force of this Directive for products under Article 1(d) - Consumer terminal equipment with advanced computing capabilities related to audiovisual media services• 4 years after the entry into force of this Directive for products under Article 1(e) - Household appliances operated by a user interface• 4 years after the entry into force of this Directive for services under Article 1.2(a) – Telephony services• 6 years after the entry into force of this Directive for services under Article 1.2(b) – Audiovisual Media services• 3 years after the entry into force of this Directive for services under Article 1.2(c)1 – air, bus, rail and waterborne passenger transport services (websites and mobile applications)• 5 years after the entry into force of this Directive for services under Article 1.2(c)1 – air, bus, rail and waterborne passenger transport services (self-service terminals and ticketing machines)• 10 years after the entry into force of this Directive for services under Article 1.2(c)2 – air, bus, rail and waterborne passenger transport services (vehicles and infrastructure)• 5 years after the entry into force of this Directive for services under Article 1.2(d) – banking services and payment terminals (self-service terminals and payment terminals)• 3 years after the entry into force of this Directive for services under
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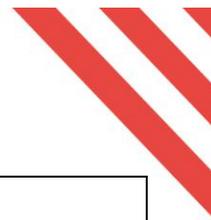
	<p>Article 1.2(d) – banking services and payment terminals (banking service)</p> <ul style="list-style-type: none">• 3 years after the entry into force of this Directive for services under Article 1.2(e) – e-books <p>3 years after the entry into force of this Directive for services under Article 1.2(f) – e-commerce, websites of providers of products and services, social media and news websites, and online platforms</p> <ul style="list-style-type: none">• this Directive for services under Article 1.2(g) – accommodation services (websites)• 3 years after the entry into force of this Directive for services under Article 1.2(g) – accommodation services (built environment) <p>2b. — Member States may provide that self-service terminals lawfully used by service providers for the provision of services before [six years after the date of entry into force of this Directive] may continue to be used in the provision of similar services until the end of their economically useful life.</p>
<p>Justification:</p> <p>The proposed timeline of six years after the entry into force of the Directive for all products and services is too long. Considering that most products and services under the proposed Accessibility Act are related to ICT and are subject to a quick evolution and a short lifespan, a progress transposition period adjusted to the life-cycle of each product is more appropriate.</p> <p>Paragraph 2(b) as proposed by AM 171 of the IMCO report should be deleted.</p>	



ANNEX I

Section IV - Audiovisual media services and the related consumer equipment with advanced computing capability

Commission proposal	EDF amendments
<p>Audiovisual media services and the related consumer equipment with advance computing capability</p> <p>A. Services:</p> <p>1. The provision of services in order to maximise their foreseeable use by persons with functional limitations, including persons with disabilities, shall be achieved by:</p> <p>(a) ensuring the accessibility of the products they use in the provision of the service, in accordance with the rules laid down in point B "Related consumer equipment with advance computing capability"</p> <p>(b) providing information about the functioning of the service and about its accessibility characteristics and facilities as follows:</p> <p>(i) the information content shall be available in text formats that can be used to generate alternative assistive formats to be presented in different ways by the users and via more than one sensory channel;</p> <p>(ii) alternatives to non-text content shall be provided;</p> <p>(iii) the electronic information,</p>	<p>Audiovisual media services and the related consumer equipment with advance computing capability</p> <p>A. Services:</p> <p>1. The provision of services in order to maximise their reasonably foreseeable use by persons with disabilities shall be achieved by meeting the functional performance requirements set out in Part C of section I, and shall include:</p> <p>(a) the products the service providers use in the provision of the service concerned, in accordance with the rules laid down in Part B of this Section;</p> <p>(b) information about the functioning of the service concerned and about its accessibility characteristics and facilities, including within the Electronic Programming Guides;</p>



<p>including the related online applications needed in the provision of the service shall be provided in accordance with point (c).</p> <p>(c) making websites accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;</p> <p>(d) providing accessible information to facilitate complementarities with assistive services;</p> <p>(e) including functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with functional limitations.</p>	<p>(c) making websites accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;</p> <p>(d) mobile and TV device-based applications.</p> <p>(e) information to facilitate complementarities with assistive services;</p> <p>(e) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities; which can be achieved for instance by ensuring the following:</p> <p>(i) The subtitles for the deaf and hard of hearing are well synchronised with the video, readable, accurate and comprehensible in order to effectively reflect the audio information. This includes setting up quality specifications covering at least the font type, font size, contrast</p>
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	<p><i>and use of colours as well as, where possible, the necessary requirements to ensure users' control over these subtitles.</i></p> <p>(ii) <i>The audio description and spoken subtitles are well synchronized with the video. This includes setting up quality specifications related to audio placement and clarity of the audio description and spoken subtitles, as well as the necessary requirements to ensure users' control over them.</i></p> <p>(iii) <i>The sign language interpretation is accurate and comprehensible in order to effectively reflect the audio information. This includes setting up professional requirements for the interpreters and quality specifications for the way the signing is provided. Where technically possible, requirements to ensure users' control over the signing provision should be adopted.</i></p>
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Justification:

Similarly to other services, persons with disabilities find very little information on what audiovisual content includes access services. Furthermore, EPGs and information about the programmes remain largely inaccessible for them. That is why, EDF believes that audiovisual media service providers shall update their “gateways” to content and make them accessible. (Concerning the audiovisual content, the accessibility requirements, i.e. quantitative targets for each of the access service, has been proposed in article 3 of the EAA).

One of the gateways is the EPG, which should inform about the availability of access services and be accessible itself. Additional gateways increasingly used by viewers are the websites and mobile apps of the audiovisual service providers. Even though not all the audiovisual content will include access services (see EDF amendments for article 3), it is crucial that these websites and apps are designed following the relevant and commonly used W3C standards.

Additionally, access services are increasingly produced through automatic tools that may



reduce the quality of the access service (e.g. automatic subtitles without human supervision). EDF does not reject the use of these new tools, but it is therefore necessary that audiovisual media service providers, in consultation with users, freely set out quality standards (point h). As for the equipment (televisions), we include the additional functional requirements to support the access services, allowing industry to come up with solutions for further personalisation by the user (some people may need subtitles but with high contrast), or by synchronizing another device to render or display the access service. For instance, a blind person may prefer to synchronise his smartphone with headsets to get the audio description for the movie he is watching with the family (there already exist some apps capable of this). We did not include anything on the menu navigation because this is how the equipment is operated by the user, therefore the functional accessibility requirements of Section I should apply.
Delete IMCO AMs 191 (title), 192, and 193

Rest of Annex I

Even though there are many undermining amendments in the IMCO report, the following ones should be tackled:

IMCO AM 184 – Self-service terminals:

<p>(c) the functionality of the product by providing functions aimed to address the needs of persons with disabilities; which can be achieved for instance by allowing for the use of personal headsets, where a timed response is required, by alerting the user by more than one sensory channel and by giving the possibility to extend the time permitted and by having an adequate contrast and tactilely discernible keys and controls;</p>	<p>(c) the functionality of the product by providing functions aimed to address the needs of persons with disabilities; which must be achieved by allowing for the use of personal headsets, where a timed response is required, by alerting the user by more than one sensory channel and by giving the possibility to extend the time permitted and by having an adequate contrast and tactilely discernible keys and controls;</p>
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IMCO AM 187 – Telephony and emergency services

<p>(e) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of</p>	<p>(e) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of</p>
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persons with disabilities and ensure interoperability; which can be achieved for instance by supporting voice, video and real time text communication, alone or in combination (total conversation), between two users, or between a user and an emergency service.	persons with disabilities and ensure interoperability; which must be achieved by supporting voice, video and real time text communication, alone or in combination (total conversation), between two users, or between a user and an emergency service.
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IMCO AM 189 – Smartphones

(e) the functionality of the product by providing functions aimed to address the needs of persons with disabilities and ensure interoperability; which can be achieved for instance by supporting high fidelity audio, a video resolution enabling sign language communication, real time text alone or in combination with voice and video communication or by ensuring effective wireless coupling to hearing technologies;	(e) the functionality of the product by providing functions aimed to address the needs of persons with disabilities and ensure interoperability; which must be achieved by supporting high fidelity audio, a video resolution enabling sign language communication, real time text alone or in combination with voice and video communication or by ensuring effective wireless coupling to hearing technologies;
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IMCO AM 195 – TVs

(e) the functionality of the product by providing functions aimed to address the needs of persons with disabilities; which can be achieved for instance by supporting the possibility to select, personalise and display access services such as subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation, by providing means for effective wireless coupling to hearing technologies or by providing the user controls to activate access services for audiovisual services to the user at the same level of prominence as the primary media controls;	(e) the functionality of the product by providing functions aimed to address the needs of persons with disabilities; which must be achieved by supporting the possibility to select, personalise and display access services such as subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation, by providing means for effective wireless coupling to hearing technologies or by providing the user controls to activate access services for audiovisual services to the user at the same level of prominence as the primary media controls;
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IMCO AM 198 – Transport services

<p>(c) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities; which can be achieved for instance by providing smart ticketing (electronic reservation, booking of tickets, etc.), real-time passenger information (timetables, information about traffic disruptions, connecting services, onwards travel with other transport modes, etc.), and additional service information (e.g. staffing of stations, lifts that are out of order or services that are temporarily unavailable);</p>	<p>(c) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities including making mobile-based services including mobile applications needed in the provision of the service accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a robust way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;</p> <p>This concerns part of the service such as smart ticketing (electronic reservation, booking of tickets, etc.), real-time passenger information (timetables, information about traffic disruptions, connecting services, onwards travel with other transport modes, etc.), and additional service information (e.g. staffing of stations, lifts that are out of order or services that are temporarily unavailable);</p>
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IMCO AM 205 – Banking services

<p>(ba) electronic information, including the related websites and online applications needed in the provision of the service concerned. That can refer for instance to</p>	<p>(ba) electronic information, including the related websites and online applications needed in the provision of the service concerned including electronic</p>
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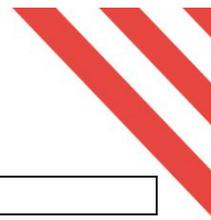
electronic identification, security and payment methods needed for the provision of the service;	identification, security and payment methods needed for the provision of the service;
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IMCO AM 212 – e-Books

(b) information about the functioning of the service and about its accessibility characteristics and facilities;	(b) information about the functioning of the service and about its accessibility characteristics and facilities providing available information (metadata) on accessibility features of products and services;
(e) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities .	(e) functions, practices, policies, procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities which must be achieved by ensuring the navigation throughout the document, 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..

IMCO AM 215 – e-Commerce

(aa) electronic information, including the related online applications needed in the provision of the service concerned shall be provided in accordance with point (b); which can refer for instance to electronic identification, security and payment methods needed for the provision of the	(aa) electronic information, including the related online applications needed in the provision of the service concerned shall be provided in accordance with point (b) including the electronic identification, security and payment methods needed for the provision of the service;
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service;

IMCO AM 216 (products) and 218 (services) – Other Union Acts

Accessibility requirements have been removed, as well as the user interface (AM 217), and instead it includes the Functional Performance Requirements.

We could accept the first addition in the first paragraph of AM 216 and 218, but reject the removal of the specific accessibility requirements. E.g. “(ii) the information shall be available in different ways and via more than one sensory channel;”

Amendment 216

Proposal for a directive Annex I – Section IX – Part A – point1

<i>Text proposed by the Commission</i>	<i>Amendment</i>
<p>1. Design and production</p> <p>The design and production of products in order to maximise their foreseeable use by persons with functional limitations, including persons with disabilities and those with age related impairments, shall be achieved by making accessible the following:</p> <p>(a) the information on the use of the product provided in the product itself (labelling, instructions, warning), which:</p> <p>(i) must be available by more than one sensory channel;</p> <p>(ii) must be understandable;</p> <p>(iii) must be perceivable;</p> <p>(iv) shall have an adequate size of</p>	<p>1. Design and production</p> <p>The design and production of products in order to maximise their foreseeable use by persons with disabilities and those with age-related impairments shall be achieved by meeting the functional performance requirements set out in Part C of Section I, and shall include:</p> <p>(a) the information on the use of the product provided in the product itself (labelling, instructions, warning);</p> <p>(i) must be available by more than one sensory channel;</p> <p>(ii) must be understandable;</p> <p>(iii) must be perceivable;</p> <p>(iv) shall have an adequate size of</p>



fonts in foreseeable use conditions;

(b) the packaging of the product including the information provided in it (opening, closing, use, disposal);

(c) the product instructions for use, installation and maintenance, storage and disposal of the product **which shall comply with the following:**

(i) **content of instruction shall be available in text formats that can be used for generating alternative assistive formats to be presented in different ways and via more than one sensory channel, and**

(ii) **instructions shall provide alternatives to non-text content;**

(d) the user interface of the product (handling, controls and feedback, input and output) **in accordance with point 2;**

(e) the functionality of the product by providing functions aimed to address the needs of persons with **functional limitations, in accordance with point 2;**

(f) the interfacing of the product with assistive devices.

fonts in foreseeable use conditions;

(b) the packaging of the product including the information provided in it (opening, closing, use, disposal);

(c) the product instructions for use, installation and maintenance, storage and disposal of the product **which shall comply with the following;:**

(i) **content of instruction shall be available in text formats that can be used for generating alternative assistive formats to be presented in different ways and via more than one sensory channel, and**

(ii) **instructions shall provide alternatives to non-text content;**

(d) the user interface of the product (handling, controls and feedback, input and output);

(e) the functionality of the product by providing functions aimed to address the needs of persons with **disabilities;**

(f) the interfacing of the product with assistive devices.

Amendment 218

Proposal for a directive Annex I – Section IX – Part B – point 1

Text proposed by the Commission

1. The provision of services in order to maximise their foreseeable

Amendment

1. The provision of services in order to maximise their **reasonably**



use by persons with **functional limitations, including persons with disabilities**, shall be achieved by:

- (a) **making accessible** the built environment where the service is provided, including transport infrastructure, in accordance with Part C, without prejudice to national and Union legislation for the protection of national treasures possessing artistic, historic or archaeological value;
- (b) **making facilities accessible**, including vehicles, crafts and equipment needed for the delivery of the service as follows:
 - (i) the design of its built space shall follow the requirements **under** Part C in relation to boarding, disembarking, circulation and use;
 - (ii) **the information shall be available in different ways and via more than one sensory channel;**
 - (iii) **alternatives to non-text visual content shall be provided.**
- (c) **ensuring the accessibility of** the products used in the provision of the service, in accordance with the rules laid down in Part A;
- (d) **providing** information about the functioning of the service and about its accessibility characteristics and facilities **as follows:**
 - (i) **the information content shall be available in text formats that can be used for generating alternative assistive formats to be presented in different ways by the users and via**

foreseeable use by persons with disabilities shall be achieved by **meeting the functional performance requirements set out in Part C of Section I, and shall include:**

- (a) the built environment where the service is provided, including transport infrastructure, in accordance with Part C, without prejudice to national and Union legislation for the protection of national treasures possessing artistic, historic or archaeological value;
- (b) making facilities accessible, including vehicles, crafts and equipment needed for the delivery of the service as follows:
 - (i) the design of its built space shall follow the requirements **set out in** Part C in relation to boarding, disembarking, circulation and use;
 - (ii) **the information shall be available in different ways and via more than one sensory channel;**
 - (iii) **alternatives to non-text visual content shall be provided.**
- (c) ensuring the accessibility of the products used in the provision of the service, in accordance with the rules laid down in Part A;
- (d) providing information about the functioning of the service and about its accessibility characteristics and facilities as follows:
 - (i) **the information content shall be available in text formats that can be used for generating alternative assistive formats to be presented in different ways by the users and via**



more than one sensory channel,

(ii) alternatives to non-text content shall be provided;

(iii) the electronic information, including the online related applications needed in the provision of the service shall be provided in accordance with point (e).

(e) making websites accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;

(f) **providing accessible** information to facilitate complementarities with assistive services;

(g) **including** functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with **functional limitations**.

more than one sensory channel,

(ii) alternatives to non-text content shall be provided;

(iii) the electronic information, including the online related applications needed in the provision of the service shall be provided in accordance with point (e).

(e) making websites **and mobile-based devices** accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;

(f) information to facilitate complementarities with assistive services and technologies;

(g) functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with **disabilities**.

Related documents

- [EDF's initial position paper on the EAA \(2016\)](#)
- [EDF members' positions on the EAA](#)



- [Commission proposal for a Directive on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services \(European Accessibility Act\), COM \(2015\) 615](#)
- [EDF report: European Accessibility Act – State of play \(2014\)](#)
- [EDF Position on the European Accessibility Act \(2013\)](#)
- [EDF reply to the Commission consultation on the European Accessibility Act \(2012\)](#)
- [EDF reply to the Commission consultation on the Audiovisual Media Services Directive \(2015\)](#)
- [EDF and AGE recommendations for an inclusive Digital Single Market \(2015\)](#)
- [EDF top campaign on Web Accessibility](#)
- [EDF Toolkit for the promotion of the European Standard 301549 \(Mandate 376\), accessibility requirements for ICT products and services](#)

Acknowledgments

EDF would like to thank all those who have contributed to this paper, and in particular the members of the EDF Task Force on the Accessibility Act, the members of the EDF ICT e-mail expert group, and the members of the EDF transport e-mail expert group.

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