



# Standardisation for the European Accessibility Act (EAA)

European Disability Forum  
| September 2021

**EDF Position Paper on European Commission's draft  
Standardisation Request for the European Accessibility Act**



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## Introduction

### The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

### Acknowledgements

We thank the members of the EDF e-mail expert groups on **Information and Communication Technologies (ICT), Transport, Built Environment, Standardisation, European Accessibility Act**, and Board of Directors for their support in the development of this position paper.

## Executive Summary

We welcome the European Commission's draft standardisation request to the European standardisation organisations (ESOs) as regards the accessibility requirements of products and services in support of Directive (EU) 2019/882 (the European Accessibility Act - EAA). This includes the **revision of three existing standards**:

1. EN 301 549 - Accessibility requirements for ICT products and services
2. EN 17161 - Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users
3. EN 17210 - Accessibility and usability of the built environment - Functional requirements

And the request for the **development of three new standards**:

4. Harmonised standard(s) setting up requirements on the accessibility of non ICT information related to products
5. Harmonized standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services)
6. Harmonized standard for the accessibility of emergency communications and for the answering of emergency communications by the PSAPs (including to the single European Emergency number 112)

We also welcome the fact that the EN 301 549 on accessibility requirements for ICT products and services, harmonised for the purpose of the **Web Accessibility Act**, will also be updated within this standardisation request for the EAA. This will ensure coherence between these two pieces of legislation.

The requested standards will be crucial for proper implementation of EAA and help harmonise approaches to accessibility and avoid legal uncertainty during the application of the Directive.

We especially welcome provisions calling for **inclusion of European umbrella organisations of persons with disabilities** and other relevant stakeholders in an accessible standards development process, as well as making such standards **free of charge for not-for-profit organizations**. We propose further improvements below.

Furthermore, we support the exclusion of **e-books** from the standardisation request if the current industry standard fulfils the mandatory requirements of the EAA.

Given that the EAA also applies to publicly procured products and services, we also support the **revision of technical reports** CEN/CLC/ETSI TR 101551:2014<sup>1</sup>, and CEN/CLC/ETSI/TR 101 552:2014<sup>2</sup> as well as the toolkit requested in the standardisation request (recital 31). We nevertheless believe that **the request of such toolkit should be much clearer in the Commission decision** by, for example, specifying its characteristics and scope in a new Annex (new Annex V).

In this position, we reinstate [our recommendations for ensuring inclusive European Standardisation in support of the European Accessibility Act](#), which we have issued in June of this year. Based on these, we recommend strengthening the draft standardisation request by:

- Reinforcing the provisions related to **inclusive European standardization** with participation of organizations of persons with disabilities – DPOs. (Recital 27, Article 2.4 of draft request).
- **Monitoring involvement of DPOs** in standardisation both at European and national level. (Article 3 of draft request)
- Requesting to the ESOs **clear terms of reference** for the technical committees responsible of EAA related standards (Article 2.5 (new)).
- Ensuring that **deadlines** for development and revision of standards in view of harmonisation for the EAA do not exceed the date of application of the EAA. (Recital 29 of draft request, and Annexes I, II, and III).
- Making harmonised standards **free of charge for all interested private and public players**. (Article 4, and Annex IV, Part A, 3).
- **Reinforcing interoperability** of emergency communication, as well as electronic communication services, throughout the draft standardization request and Annexes. (Recitals 8 and 22 of draft request; Annex I, table 1, 3; Annex IV, Part B, 2.3).
- Developing **another harmonized standards setting up quality requirements of access services for audiovisual media services**, namely subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation. (Annex I, table 1, 4 new; Annex IV, Part B, 2.4 new).
- Including information about the **accessibility statement**<sup>3</sup> requested by the Web Accessibility Directive in the EN 301549 and/or in the EN concerning support services. (Recital 35 (new) of draft request; Annex IV Part C 2.4, and Part D).

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<sup>1</sup> Guidelines on the use of accessibility award criteria suitable for public procurement of ICT products and services in Europe.

<sup>2</sup> Guidance for the application of conformity assessment to accessibility requirements for public procurement of ICT products and services in Europe.

<sup>3</sup> Commission Implementing Decision (EU) 2018/1523, available at [https://eur-lex.europa.eu/eli/dec\\_impl/2018/1523/oj](https://eur-lex.europa.eu/eli/dec_impl/2018/1523/oj)

## EDF suggested amendments to the Draft Standardisation Request and supporting Annexes

### Implementing decision – draft standardisation request

#### Recital 8

Commission proposal	EDF proposed amendments
In accordance with Directive (EU) 2018/1972, Member States are to ensure that access for end-users with disabilities to emergency services is available through emergency communications and is equivalent to that enjoyed by other end-users, in accordance with Union law harmonising accessibility requirements for products and services. Directive (EU) 2019/882 contains accessibility requirements with regard to emergency communications as well as answering emergency communications to the single European emergency number '112' in order to ensure equivalent access to emergency services for, and maximise the foreseeable use by, persons with disabilities.	In accordance with Directive (EU) 2018/1972, Member States are to ensure that access for end-users with disabilities to emergency services is available through emergency communications and is equivalent to that enjoyed by other end-users, in accordance with Union law harmonising accessibility requirements for products and services. <b>Directive (EU) 2018/1972 also requires to ensure interoperability across Member States based, to the greatest extent possible, on European standards or specifications.</b> Directive (EU) 2019/882 contains accessibility requirements with regard to emergency communications as well as answering emergency communications to the single European emergency number '112' in order to ensure equivalent access to emergency services for, and maximise the foreseeable <b>and interoperable</b> use by, persons with disabilities <b>across the EU.</b>

#### Justification:

It is important to highlight in the Standardisation Request the crucial aspect of **interoperability** of emergency communication, as well as electronic communication services, throughout the text.

As EECC states by article 109.5 "Member States shall ensure that access for end-users with disabilities to emergency services is available through emergency communications and is equivalent to that enjoyed by other end-users, in accordance with Union law harmonising accessibility requirements for products and services. The Commission and the national regulatory or other competent authorities shall take appropriate measures to ensure that, whilst travelling in another Member State, end-users with disabilities can access emergency services

on an equivalent basis with other end-users, where feasible without any pre-registration. Those measures shall seek to ensure interoperability across Member States and shall be based, to the greatest extent possible, on European standards or specifications laid down in accordance with Article 39. Such measures shall not prevent Member States from adopting additional requirements in order to pursue the objectives set out in this Article.”

Therefore, we made several suggestions in the draft implementing decision and Annexes.

## Recital 18

Commission proposal	EDF proposed amendments
The Commission has already issued a standardisation mandate M/420 <sup>4</sup> to the European standardisation organisations to develop a European standard specifying the functional accessibility requirements for public procurement in the built environment. To this end, the European standardisation organisations adopted the European standard EN 17210:2021 <sup>5</sup> . The standardisation activities under the current request should be built upon the outcome of the work under the standardisation mandate M/420 and ESOs should try to benefit from the work arrangements established under that mandate. The accessibility levels already established in EN 17210:2021 should be maintained as a minimum for the purpose of this request.	The Commission has already issued a standardisation mandate M/420 <sup>6</sup> to the European standardisation organisations to develop a European standard specifying the functional accessibility requirements for public procurement in the built environment. To this end, the European standardisation organisations adopted the European standard EN 17210:2021 <sup>7</sup> . The standardisation activities under the current request should be built upon the outcome of the work under the standardisation mandate M/420, <b>as well as relevant international and national technical standards to develop technical specifications for accessibility and usability of the built environment</b> and ESOs should try to benefit from the work arrangements established under that mandate. The accessibility levels already established in EN 17210:2021 should be maintained as a minimum for the purpose of this request.
<b>Justification:</b>	

<sup>4</sup> M/420 of 21 December 2007, Standardisation mandate to CEN, Cenelec and ETSI in support of European accessibility requirements for public procurement in the built environment

<sup>5</sup> EN 17210:2021 Accessibility and usability of the built environment - Functional requirements

<sup>6</sup> M/420 of 21 December 2007, Standardisation mandate to CEN, Cenelec and ETSI in support of European accessibility requirements for public procurement in the built environment

<sup>7</sup> EN 17210:2021 Accessibility and usability of the built environment - Functional requirements

EDF has always been in support of having a technical standard for accessibility and usability of the built environment with technical (not functional) accessibility requirements which are testable. Such a standard would support a common level of harmonisation of accessibility throughout the EU. FprCEN/TR 17621 covering technical performance criteria and specifications, relevant national standards, and [ISO 21542:2021 Building construction — Accessibility and usability of the built environment](#) provide solid basis for a European technical standard on accessibility and usability of the built environment harmonised for the EAA.

## Recital 22

Commission proposal	EDF proposed amendments
In accordance with Directive (EU) 2019/882 the accessibility requirements are to be interpreted and applied in such a way as to take into account the state of the art and current practice at the time of design and production of products and provision of services, including the built environment where the services under the scope of that Directive are provided, the emergency communications and the answering of emergency communications to the single European emergency number '112' for persons with disabilities throughout the Union, as well as technical and economic considerations which are consistent with a high degree of accessibility. This apply similarly to relevant obligations set out in Union acts other than Directive (EU) 2019/882, as regards accessibility requirements.	In accordance with Directive (EU) 2019/882 the accessibility requirements are to be interpreted and applied in such a way as to take into account the state of the art and current practice at the time of design and production of products and provision of services, including the built environment where the services under the scope of that Directive are provided, the emergency communications and the answering of emergency communications to the single European emergency number '112' for persons with disabilities <b>in an interoperable manner</b> throughout the Union, as well as technical and economic considerations which are consistent with a high degree of accessibility. This apply similarly to relevant obligations set out in Union acts other than Directive (EU) 2019/882, as regards accessibility requirements.
<b>Justification:</b>  Same justification as for <a href="#">recital 8</a> of draft request.	

## Recital 27

Commission proposal	EDF proposed amendments
With a view to establishing, in the most efficient way, harmonised standards and technical specifications that meet the accessibility requirements of Directive (EU) 2019/882 and Directive (EU) 2016/2102, the Commission	With a view to establishing, in the most efficient way, harmonised standards and technical specifications that meet the accessibility requirements of Directive (EU) 2019/882 and Directive (EU) 2016/2102, the Commission <b>and</b>

should involve European umbrella organisations of persons with disabilities and all other relevant stakeholders in the drafting process. The process itself needs to satisfy accessibility requirements including in relation to its means of communication, meetings, including venues and documents.

**the Standardisation Organisations** should involve European umbrella organisations of persons with disabilities and all other relevant stakeholders in the drafting process **on equal footing among them**. The process itself needs to satisfy accessibility requirements including in relation to its means of communication, meetings, including venues and documents. **The European Standards Organisations should provide additional reasonable accommodation to representatives with disabilities when necessary. The Technical Committees to undertake the standardisation developments should have clear Terms of Reference.**

#### Justification:

We welcome the European Commission's aim to involve European umbrella organizations of persons with disabilities and all other relevant stakeholders in the drafting process. This approach should be adopted by national Standardization Organizations as well, including their mirror committees. Accessibility of the processes, documents, meetings, should be ensured, and when necessary reasonable accommodation should be provided so that persons with disabilities can equally participate in the process.

We also strongly advise having clear terms of reference for the technical committees responsible for standardization for EAA. This will avoid misunderstanding of roles and decision-making, and generally contribute to a more collaborative, transparent and inclusive standardization process.

See article [2.4 and 2.5 \(new\) of draft request](#) for further suggestions.

#### Recital 29

Commission proposal	EDF proposed amendments
In order to enable the Commission to better monitor the requested standardisation work, CEN, Cenelec and ETSI should provide the Commission with access to an overall project plan containing detailed information on the execution of the standardisation request. CEN, Cenelec and ETSI should	In order to enable the Commission to better monitor the requested standardisation work, CEN, Cenelec and ETSI should provide the Commission with access to an overall project plan containing detailed information on the execution of the standardisation request. CEN, Cenelec and ETSI should



promptly inform the Commission if they consider that additional standards would need to be developed or if they consider that more time is necessary for the execution of this request.

promptly inform the Commission if they consider that additional standards would need to be developed or if they consider that more time is necessary for the execution of this request.

**There should not be undue delays with development or revision of standards and final deadlines should be at least the day when accessibility requirement of the Act start applying.**

#### Justification:

In relation to deadlines for development of standards referenced in Annexes I, II, and III, we note that those should not exceed the date of application of Directive 2019/882. It is important that as soon as the Directive starts to apply providers or products and services have utmost clarity how to meet the requirements of the Directive, for which harmonized standards are crucial.

### Recital 31

Commission proposal	EDF proposed amendments
It is important to facilitate the use by stakeholders of the revised harmonised standard EN 301549 in support of Directive (EU) 2019/882 and Directive (EU) 2016/2102. To that end CEN, Cenelec and ETSI should provide support material and update the technical reports CEN/CLC/ETSI TR 101551:2014, and CEN/CLC/ETSI/TR 101 552:2014 to reflect the content of the revised harmonised standards resulting from this request. This revised content should be reflected on the related website and toolkit prepared. The toolkit and technical reports should be adapted to represent a current resource enabling exchange of ideas, FAQs and information useful to a variety of stakeholders, such as developers, policy officers and content managers. The toolkit should be continuously maintained, whilst it might at one point be archived, it should be kept available and accessible until a suitable replacement has been created.	It is important to facilitate the use by stakeholders of the revised harmonised standard EN 301549 in support of Directive (EU) 2019/882 and Directive (EU) 2016/2102. To that end CEN, Cenelec and ETSI should provide support material and update the technical reports CEN/CLC/ETSI TR 101551:2014, and CEN/CLC/ETSI/TR 101 552:2014 to reflect the content of the revised harmonised standards resulting from this request. This revised content should be reflected on the related website and toolkit prepared. The toolkit and technical reports should be adapted to represent a current resource enabling exchange of ideas, FAQs and information useful to a variety of stakeholders, such as developers, policy officers, <b>and</b> content managers <b>and users with disabilities</b> . The toolkit should be continuously maintained, whilst it might at one point be archived, it should be kept available and accessible until a suitable replacement has been created.

<b>Justification:</b> We welcome the proposed toolkit, and emphasise that it should be accessible for persons with disabilities.	

### Recital 35 (new)

Commission proposal	EDF proposed amendments
N/A	<b>In order to guarantee coherence between Directives (EU) 2016/2102 and 2019/882, the Commission Implementing Decision (EU) 2018/1523 establishing the accessibility statement on websites and mobile applications should also be taken into consideration in the development of this standardisation request.</b>

#### Justification:

The accessibility statement required by the Web Accessibility Directive to be added to websites and mobile applications of the public sector has proven to be useful for users to find relevant information and a feedback mechanism. We propose that this Commission decision is considered when developing the EAA harmonized standards to ensure alignment between the obligations of the public and the private sectors.

### Article 2

Commission proposal	EDF proposed amendments
4. The work shall ensure inclusiveness of persons with disabilities and their representative organisations. The work processes, meetings venues and documents shall be accessible for persons with disabilities.	4. The <del>work shall</del> <b>ESOs shall also</b> ensure inclusiveness of persons with disabilities and their representative organisations, <b>including in national mirror committees. Equal participation of persons with disabilities, their representing organisation and nominated experts shall be ensured by making</b> <del>the work processes, meetings venues and documents shall be</del> <b>exempting them from participation fees, as well as ensuring equal voting powers in national committees. The ESOs shall also guarantee the provision of reasonable accommodation of experts with disabilities when necessary.</b>

5. (new) n/a	<b>5. (new) The ESOs shall also inform the European Commission about the Terms of Reference of the different (joint) Technical Committees responsible for undertaking the standardisation request. These Terms of Reference shall include, among other, the appointment, roles and responsibilities of the Technical Committee management board, and how decisions are taken in the Technical Committee.</b>
<b>Justification:</b>  Same justification as for <a href="#">recital 27 of draft request</a> .	

### Article 3

Commission proposal	EDF proposed amendments
1. The ESOs shall report annually to the Commission on the execution of the request referred to in Article 1 indicating the progress made in implementation of the work programme referenced to in Article 2.	1. The ESOs shall report annually to the Commission on the execution of the request referred to in Article 1 indicating the progress made in implementation of the work programme referenced to in Article 2. <b>They shall also report on involvement of persons with disabilities in execution of the request as required by Article 2.4.</b>
<b>Justification:</b>  It is important to also monitor the involvement of DPOs in standardisation both at European and national level. This way, prevalent issues can be identified and addressed systematically.	

### Article 4

Commission proposal	EDF proposed amendments
N/A	<b>The harmonised standards shall be available free of charge.</b>
<b>Justification:</b>  We welcome the request to make the harmonised standards available free of charge for non-for-profit organisations in <a href="#">Annex IV, Part A, 3</a> . For the sake of consistency this should also be added in the text of the draft implementing decision.	

We recommend going further and making the harmonised standards free of charge for everyone. We highlight that the development of these standards is paid by public money and making them free for the use of all interested stakeholders will ensure their effective use. It will often be for-profit organisations (e.g. building companies, ICT service providers, etc.) who will be the main users of these standards, while DPOs and other not-for-profit organisations will benefit from free of charge standards to be able to better monitor and assess implementation of the EAA as well as promote the developed standards without any barriers.

## Annexes to the implementing decision

### Annex I - List of new standards to be drafted, list of existing standards to be revised as referred to in Article 1(1)

**Table 1: List of new harmonised standards to be drafted and deadlines for their adoption**

Commission proposal	EDF proposed amendments
2. Harmonized standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services)	2. Harmonized standard for the accessibility of support services related to products and services (help desks, <b>call-contact</b> centres, technical support, relay services, <b>and</b> training services, <b>passenger assistance services, non-emergency crucial support services (e.g. domestic violence victim support centres, covid-19 information centres, etc)</b>
3. Harmonized standard for the accessibility of emergency communications and for the answering of emergency communications by the PSAPs (including to the single European Emergency number 112)	3. Harmonized standard for the accessibility <b>and interoperability</b> of emergency communications and for the answering of emergency communications by the PSAPs (including to the single European Emergency number 112)
4. (new) N/A	<b>4. (new) Harmonized standards setting up quality requirements of access services (subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation) in audiovisual media services.</b>

**Justification:**

Paragraph 2: some editorial changes, as well as other support services which may benefit from this standard.

Paragraph 3: same as for [recital 8 of draft request](#).

Paragraph 4: the EAA Annex I, Section IV, paragraph b, point ii) requires “ensuring that the accessibility components (access services) of the audiovisual media services such as subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation are fully transmitted with adequate quality for accurate display, and synchronised with sound and video, while allowing for user control of their display and use”. We believe this standardisation request could be an opportunity to harmonise the quality aspects of these access services, and by doing so, contributing to the implementation of the Audiovisual Media Services Directive, because many EU countries do not count with national standards for these access services, preventing the free movement of providers of these services.

## **Annex IV - Requirements for the standards referred to in Article 1**

### **Part A. General requirements - 3. License free application of harmonised standards**

Commission proposal	EDF proposed amendments
Each harmonised standard shall clearly state that compliance with its requirements and specifications and in particular, when applying written or visual warnings, signs, pictograms or markings as specified in it to a product, its package or accompanying documents, is license free. The harmonised standards shall be available free of charge for non for profit organisations.	Each harmonised standard shall clearly state that compliance with its requirements and specifications and in particular, when applying written or visual warnings, signs, pictograms or markings as specified in it to a product, its package or accompanying documents, is license free. The harmonised standards shall be available free of charge <b>for non-for profit organisations</b> .

**Justification:**

Same justification as for [article 4 of draft request](#).

### **Part B. Specific requirements for drafting new standards listed in Table 1 of Annex I - 2.1 Standards on accessibility listed in Table 1 of Annex I**

Commission proposal	EDF proposed amendments
1. The harmonised standard setting up requirements on the accessibility of non-ICT information related to products	1. The harmonised standard setting up requirements on the accessibility of non-ICT information related to products

shall describe the technical solutions for accessibility to ensure conformity with the following requirement set in Annex I of Directive 2019/882:

Annex I section 1 (b) Annex I section II

Also covering Annex I section III (a) and (b)

Also covering Section IV (c) and (d) transport

Also covering Section IV(e) ii banking information

Excluding Section IV (f) ebooks

2. The harmonised standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services) shall describe the technical solutions for accessibility to ensure conformity with the following requirement set in Annex I of Directive 2019/882:

Section 1.3 for products and Section III (d) for services.

3. The harmonised standard for the accessibility of emergency communications and answering emergency communications (including to the single European emergency number 112) should support the implementation of Article 109 of Directive (EU) 2018/1972 and shall describe the technical solutions for accessibility to ensure conformity with the following requirements set in Annex I of Directive 2019/882:

Section III, Section IV and Section V

4. (new) N/A

shall describe the technical solutions for accessibility to ensure conformity with the following requirement set in Annex I of Directive 2019/882:

Annex I section 1 **(a) and (b)**

Annex I section II

Also covering Annex I section III (a) and (b)

Also covering Section IV (c) and (d) transport

Also covering Section IV(e) ii banking information

Excluding Section IV (f) ebooks

2. The harmonised standard for the accessibility of support services related to products and services (help desks, **call-contact** centres, technical support, relay services and training services) shall describe the technical solutions for accessibility to ensure conformity with the following requirement set in Annex I of Directive 2019/882:

Section 1.3 for products and Section III (d) for services.

3. The harmonised standard for the accessibility of emergency communications and answering emergency communications (including to the single European emergency number 112) should support the implementation of Article 109 of Directive (EU) 2018/1972 and shall describe the technical solutions for accessibility **and interoperability** to ensure conformity with the following requirements set in Annex I of Directive 2019/882:

Section III, Section IV and Section V

**4. The harmonized standard setting up quality requirements of access services (subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation) in audiovisual media services shall describe the technical**

	<b>specifications to ensure conformity with the following requirement set in Annex I of Directive 2019/882: Section IV (b) (ii).</b>
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**Justification:**

Paragraph 1: Annex I section 1 (a) is also relevant as it refers to understandability of information, which can also be non-ICT information.

1. Requirements on the provision of information:

(a) the information on the use of the product provided on the product itself (labelling, instructions and warning) shall be:

(i) made available via more than one sensory channel;

**(ii) presented in an understandable way;**

(iii) presented to users in ways they can perceive;

(iv) presented in fonts of adequate size and suitable shape, taking into account foreseeable conditions of use, and using sufficient contrast, as well as adjustable spacing between letters, lines and paragraphs;

Paragraph 2: the wording 'contact centres' is more appropriate as it is more in line with the EECC and EAA – not only voice and video *call* possibility, but also support real-time text and total conversation.

Paragraph 3: same justification as for [recital 8 of draft request](#).

Paragraph 4 (new): development of harmonized standard setting up quality requirements of access services in audiovisual media services is important as there is currently a big gap in harmonisation of requirements across the EU, due to the vague language of the European Audiovisual Media Services Directive. If quality standards are not ensured then the aim of EAA to ensure access to quality access services will be significantly watered down, and in some cases be lost.

Relevant clause in EAA: Annex I – Section IV – b – (ii): ensuring that the accessibility components (access services) of the audiovisual media services such as subtitles for the deaf and hard of hearing, audio description, spoken subtitles and sign language interpretation are fully transmitted with adequate quality for accurate display, and synchronised with sound and video, while allowing for user control of their display and use.

### **Part C. Specific requirements for revision of existing standards listed in Table 2 of Annex I and Table 1 of Annex II**

Commission proposal	EDF proposed amendments
2.4. Existing harmonised standard EN 301 549: v3.2.1 2021 covering accessibility requirements of ICT products and services shall be revised. The harmonised standard shall describe	2.4. Existing harmonised standard EN 301 549: v3.2.1 2021 covering accessibility requirements of ICT products and services shall be revised. The harmonised standard shall describe



the technical solutions for accessibility to ensure conformity with the accessibility requirements of article 4 of Directive (EU) 2016/2102	the technical solutions for accessibility to ensure conformity with the accessibility requirements of article 4 of Directive (EU) 2016/2102 <b>as well as the accessibility statement required by this Directive.</b>
<b>Justification:</b> See above.	

### Part D. Specific requirements for revision of existing European standardisation deliverables listed in Table 1 of Annex II

Commission proposal	EDF proposed amendments
<p>2 The requirements and their description coincide with the Four Principles of Accessibility defined in W3C Web</p> <p>Contents Accessibility Guidelines (WCAG) 2.0.EN 4 EN</p> <p>If any of these requirements are not met, users with disabilities will not be able to use the</p> <p>Web.</p> <p>2. Additional requirements for mobile applications</p> <p>The requested harmonised standard(s) shall further detail the accessibility provisions established in EN 301 549: v3.2.1 2021 to cover all specificities of mobile applications.</p> <p>The conceptual and technical specificities of mobile devices shall be duly taken into account when establishing accessibility specifications for mobile applications.</p>	<p>2 The requirements and their description coincide with the Four Principles of Accessibility defined in W3C Web</p> <p>Contents Accessibility Guidelines (WCAG) 2.0.EN 4 EN</p> <p>If any of these requirements are not met, users with disabilities will not be able to use the</p> <p>Web.</p> <p>2. Additional requirements for mobile applications</p> <p>The requested harmonised standard(s) shall further detail the accessibility provisions established in EN 301 549: v3.2.1 2021 to cover all specificities of mobile applications.</p> <p>The conceptual and technical specificities of mobile devices shall be duly taken into account when establishing accessibility specifications for mobile applications.</p> <p><b>The harmonized standard(s) shall include information about the Commission Implementing Decision (EU) 2018/1523 on the accessibility fulfilling article 7 of Directive (EU) 2016/2102.</b></p>
<b>Justification:</b> Same as above.	



## Related Documents

1. [UN Convention on the Rights of Persons with Disabilities \(UN CRPD\)](#)
2. [European Accessibility Act \(Directive \(EU\) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services \(Text with EEA relevance\)\)](#)
3. [EDF European Accessibility Act Toolkit for transposition](#)
4. [EDF recommendations on standardisation for the European Accessibility Act](#)
5. [Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030](#)
6. [Council of Europe's Common European Framework of Reference for Languages](#)

## Document credits

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