



EUROPEAN  
COMMISSION

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Brussels, 14.9.2022  
C(2022) 6456 final

**COMMISSION IMPLEMENTING DECISION**

**of 14.9.2022**

**on a standardisation request to the European standardisation organisations as regards  
the accessibility requirements of products and services in support of Directive (EU)  
2019/882 of the European Parliament and of the Council**

(Only the English, French and German texts are authentic)

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**on a standardisation request to the European standardisation organisations as regards the accessibility requirements of products and services in support of Directive (EU) 2019/882 of the European Parliament and of the Council**

(Only the English, French and German texts are authentic)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 1025/2012 of the European Parliament and of the Council of 25 October 2012 on European standardisation, amending Council Directives 89/686/EEC and 93/15/EEC and Directives 94/9/EC, 94/25/EC, 95/16/EC, 97/23/EC, 98/34/EC, 2004/22/EC, 2007/23/EC, 2009/23/EC and 2009/105/EC of the European Parliament and of the Council and repealing Council Decision 87/95/EEC and Decision No 1673/2006/EC of the European Parliament and of the Council,<sup>1</sup> and in particular Article 10(1) thereof,

Whereas:

- (1) The products referred to in Article 2(1) of Directive (EU) 2019/882, for which requested harmonised standards can support the high level of accessibility that should be ensured, as set in its article 4, are the following: consumer general purpose computer hardware systems and operating systems for those hardware systems; payment terminals; automated teller machines; ticketing machines; check-in machines; interactive self-service terminals providing information, excluding terminals installed as integrated parts of vehicles, aircrafts, ships or rolling stock; consumer terminal equipment with interactive computing capability, used for electronic communications services; consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services; e-readers.
- (2) The services referred to in Article 2(2) of Directive (EU) 2019/882 for which requested harmonised standards can support the high level of accessibility that should be ensured, as set in its article 4, are the following: electronic communications services with the exception of transmission services used for the provision of machine-to-machine services; services providing access to audiovisual media services; the following elements of air, bus, rail and waterborne passenger transport services, except for urban, suburban and regional transport services for which only the elements under point (v) apply: (i) websites; (ii) mobile device-based services including mobile applications; (iii) electronic tickets and electronic ticketing services; (iv) delivery of transport service information, including real-time travel information; this should, with regard to information screens, be limited to interactive screens located within the territory of the Union; and (v) interactive self-service terminals located within the territory of the Union, except those installed as integrated parts of vehicles, aircrafts,

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<sup>1</sup> OJ L 316, 14.11.2012, p. 12.

ships and rolling stock used in the provision of any part of such passenger transport services; consumer banking services; and e-commerce services. In line with feedback received from European Publishers and confirmed by representative organizations of persons with disabilities referring to the availability of EPUB accessibility technical specifications under W3C e-books and dedicated software should be excluded from this request.

- (3) Directive (EU) 2019/882 contains in its article 4 accessibility requirements with regard to the built environment where the services under the scope of that Directive are provided, in order to maximise the foreseeable use of such environment by persons with disabilities in an independent manner and which requested harmonised standards can support.
- (4) In accordance with article 109(5) of 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. Pursuant to Article 40(5) of Directive (EU) 2018/1972 it is required to ensure interoperability across Member States based, to the greatest extent possible, on European standards or specifications. 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 and interoperable use by, persons with disabilities, across the Union.
- (5) In accordance with Article 15 of Directive (EU) 2019/882, products and services which are in conformity with harmonised standards or parts thereof the references of which have been published in the *Official Journal of the European Union* should be presumed to be in conformity with the accessibility requirements of that Directive covered by those standards or parts thereof.
- (6) In accordance with Article 25 of Directive (EU) 2019/882, products and services, which are in conformity with harmonised standards or parts thereof which are adopted in accordance with Article 15 of that Directive should be presumed to be in compliance with the relevant accessibility requirements set out in Union acts other than that Directive.
- (7) The harmonised framework set out by Directive (EU) 2019/882 should ensure that designers and producers of accessible products and providers of accessible services face fewer barriers to operating in the internal market. In order to make this harmonised framework fully operational, it is essential that harmonised standards express such specifications regarding the requirements set by Directive (EU) 2019/882.
- (8) Voluntary harmonised standards should help ensure high level of accessibility of products and services, including of the built environment where the services under the scope of that Directive are provided. Voluntary harmonised standards should also help ensure high level of accessibility of the answering of emergency communications to the single European emergency number '112' for persons with disabilities throughout the Union and thus contribute to the free movement of those products and services in the Union. Given that such standards are technology-neutral and performance-based, they also contribute to ensuring equal conditions of competition among relevant economic operators dealing with accessibility of products and services, in particular small and medium-sized enterprises. Indirectly those standards also contribute to

lower design, production and provision costs of accessible products and services benefitting consumers in particular.

- (9) Voluntary harmonised standards should help ensure a high level of accessibility of products and services, including the built environment where the services under the scope of that Directive are provided, and the answering of emergency communications to the single European emergency number '112' throughout the Union, contributing to the legal certainty for local and public authorities and to the approximation of accessibility requirements across the Union, thereby guaranteeing the facilitation of the fulfilment of accessibility obligations in public procurement processes, and obligations regarding accessibility set out in Union acts other than Directive (EU) 2019/882 easing the access to for example Union Funds and, eventually facilitating the use of products and services for all consumers, and in particular by persons with disabilities.
- (10) The Union and all its Member States are parties to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD entered into force for the Union on 23 January 2011 and is binding upon the institutions of the Union and on its Member States, in line with their respective competences. The UNCRPD calls on its parties to undertake or promote research and development of, and promote the availability and use of, new technologies, including information and communication technologies, mobility aids, devices and assistive technologies, suitable for persons with disabilities. These standards will support Member States in their efforts to fulfil their national commitments, as well as their obligations under the UNCRPD, regarding accessibility requirements in a harmonised manner.
- (11) In article 4 of Directive (EU) 2016/2102 of the European Parliament and of the Council 4 common accessibility requirements are established to ensure that the websites and mobile applications of public sector bodies are made more accessible in order to improve the functioning of the internal market and for whose support revised harmonised standard are requested.
- (12) The Commission has already issued a standardisation mandate M/376 to the European standardisation organisations to develop a European standard specifying the functional accessibility requirements for public procurement of products and services in the ICT domain. To this end, European Committee for Standardisation (CEN), the European Committee for Electrotechnical Standardisation (Cenelec) and the European Telecommunications Standards Institute (ETSI) (the European standardisation organisations hereafter referred to as ('the ESOs) organisations adopted the European standard EN 301 549 V1.1.2 (2015-04). In addition, to support the use of the standard, the ESOs, adopted CEN/CLC/ETSI TR 101551:2014, and CEN/CLC/ETSI/TR 101 552:2014.
- (13) Harmonised standard EN 301 549:2021 has been drafted in support of Directive (EU) 2016/2102 on the basis of Commission Implementing Decision C(2017) 2582<sup>2</sup> to the ESOs in the field of accessibility of websites and mobile applications of public sector bodies. The harmonised standard needs to be revised and completed to take into account essential accessibility requirements set out in Directive (EU) 2019/882 and the scope of products and services, covered by Directive (EU) 2019/882. When revising this harmonised standard, for the purpose of Directive (EU) 2019/882, the accessibility

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<sup>2</sup> C(2017) 2585 Commission Implementing Decision of 27.04.2017 on a standardisation request to the European standardisation organisations in support of Directive (EU) 2016/2102 of the European Parliament and of the Council on the accessibility of websites and mobile applications of public sector bodies.

levels already established in EN 301 549 should be maintained as a minimum and revisions to that harmonised standards for the purposes of Directive (EU) 2016/2102 should be done on the basis of this request. To ensure information to consumers about accessibility requirements to services, in line with Annex I section III (c) to Directive 2019/882, the revised and new harmonised standards should include accessibility statements similar to those in Article 7 of Directive 2016/2102.

- (14) In order to guarantee coherence between Directives (EU) 2016/2102 and 2019/882, Commission Implementing Decision (EU) 2018/1523<sup>3</sup> establishing the accessibility statement on websites and mobile applications should also be taken into consideration in the development of this standardisation request.
- (15) The Commission has already issued a standardisation mandate M/420<sup>4</sup> to the ESOs to develop a European standard specifying the functional accessibility requirements for public procurement in the built environment. To this end, the ESOs 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 as well as upon relevant international and national standards 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. To fulfil the accessibility requirements in the annexes of the EAA, EN 301549 and EN 17210:2021 can help organisations in addressing barriers when it comes to technical requirements until the harmonised standards are published.
- (16) The Commission has already issued a standardisation mandate M/473<sup>6</sup> to the ESOs to develop a European standard aimed at including ‘Design for All’ approach in relevant standardisation initiatives for products and services. To this end, the ESOs adopted the European standard EN 17161:2019<sup>7</sup>. The standardisation activities<sup>8</sup> under this request should build upon the outcome of the work under the standardisation mandate M/473. ESOs should try to benefit from the work arrangements established under that mandate. The accessibility levels already established in EN 17161:2019 should be maintained as a minimum for the purpose of this request. EN 17161:2019 is useful for the organisation concerned by the European Accessibility Act to understand the concepts of accessibility, prepare their policies, stakeholder contacts and training, and to reach interoperability of products and services, until the harmonised standard is published. In the context of M/473, EN 17478 ‘Transport Services - Customer communications for passenger transport services - A Universal Design approach’ was developed and includes useful information for services.
- (17) The intention to request the drafting of harmonised standards in support of Directive (EU) 2019/882 is stated in point 12 of the table entitled ‘Standardisation requests for

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<sup>3</sup> Commission Implementing Decision (EU) 2018/1523 of 11 October 2018 establishing a model accessibility statement in accordance with Directive (EU) 2016/2102 of the European Parliament and of the Council on the accessibility of the websites and mobile applications of public sector bodies (L 256, 12.10.2018, p. 103).

<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/473 of 1 September 2010, Standardisation mandate to CEN, CENELEC and ETSI to include “Design for All” in relevant standardisation initiatives.

<sup>7</sup> EN 17161:2019 Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users.

<sup>8</sup> <https://www.cencenelec.eu/areas-of-work/cen-cenelec-topics/accessibility/design-for-all/>

development/revision of harmonised European standards in support of Union legislation' set out in of the annual Union work programme for European standardisation<sup>9</sup> for 2022 and in point 12 of its Annex.

- (18) The ESOs have indicated that the work covered by this request falls entirely within their area of competence.
- (19) 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 in an interoperable manner throughout the Union, as well as technical and economic considerations which are consistent with a high degree of accessibility. This applies similarly to relevant obligations set out in Union acts other than Directive (EU) 2019/882, as regards accessibility requirements.
- (20) It is therefore appropriate to request the ESOs to revise the relevant European and harmonised standards in support of Directive (EU) 2019/882 and Directive (EU) 2016/2102 and to revise the technical reports CEN/CLC/ETSI TR 101551:2014, and CEN/CLC/ETSI/TR 101 552:2014. Those deliverables should be adopted by the ESOs by the deadlines set in this Decision.
- (21) Harmonised standards should include detailed technical specifications of the accessibility requirements, especially with respect to the design and construction of products and provision of services, set out in Directive (EU) 2019/882 and Directive (EU) 2016/2102 and that can also be used for other Union acts as set in Article 24 and Article 25 of Directive (EU) 2019/882 as regards accessibility requirements. They should also indicate clearly the correspondence between technical specifications and the accessibility requirements they aim to cover. They should also be based on risk assessment and risk reduction methodologies and reflect the generally acknowledged state of the art.
- (22) The ESOs have agreed to follow the Guidelines for the execution of standardisation requests<sup>10</sup>.
- (23) 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 and the ESOs, in line with Regulation 1025/2012 and the UNCRPD should invite European umbrella organisations of persons with disabilities, and all other relevant stakeholders to participate in the drafting process. The process itself needs to satisfy accessibility requirements, including in relation to its means of communication, meetings, venues and documents. The European Standardisation Organisations should also provide reasonable accommodation to participants with disabilities upon request. This point should be reflected in the ESOs response to this request reflecting it in this standardisation work.

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<sup>9</sup> [C\(2022\)546 final of 2/22/2022, Commission Notice The 2022 annual Union work programme for European standardisation](#).

<sup>10</sup> SWD(2015) 205 final of 27 October 2015.

- (24) In order to ensure transparency and facilitate the execution of the requested standardisation activities, the ESOs should prepare a work programme and submit it to the Commission.
- (25) In order to enable the Commission to better monitor the requested standardisation work, the ESOs should provide the Commission with access to an overall project plan containing detailed information on the execution of this standardisation request. The ESOs 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. Final deliverables should be available by the application date of the relevant provisions of Directive 2019/882.
- (26) Information as to which accessibility requirements are covered by a harmonised standard is necessary when assessing, in accordance with Article 10(5) of Regulation (EU) 1025/2012, the compliance of the documents drafted by ESOs. Such information is also necessary before publication of references of harmonised standards in the *Official Journal of the European Union* in accordance with Article 10(6) of Regulation (EU) 1025/2012. In each harmonised standard, The ESOs should therefore describe the extent to which it aims to cover one or several accessibility requirements set out in Directive (EU) 2019/882 and in Directive (EU) 2016/2102.
- (27) 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 the ESOs 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.
- (28) In accordance with Article 10(3) of Regulation (EU) No 1025/2012 each standardisation request is subject to acceptance by the relevant ESO. It is therefore necessary to provide for rules on the validity of this request if it is not accepted by the ESOs.
- (29) In order to ensure legal certainty as to the validity of this request after its execution, it is appropriate to provide for a date of expiry of this implementing Decision.
- (30) Given that the harmonised standard EN 301549 has been drafted on the basis of Commission Implementing Decision C(2017)2585 (M/554)<sup>11</sup> and this Decision provides for a basis to complete work on draft harmonised standards based on that request, it is appropriate to provide for the end of validity of the Decision for that request.
- (31) Given that several European standards and European standardisation deliverables on accessibility have been drafted on the basis of standardisation mandates M/376, M/420 and M/473, and this implementing Decision provides for a basis to complete work on draft harmonised standards and revise relevant European standards and European standardisation deliverables, it is appropriate to provide for the end of the validity of the Decision for those mandates.
- (32) The ESOs, the European stakeholders' organisations receiving Union financing and the High-Level Group on Disability and the National contact points established for the transposition of Directive (EU) 2019/882 have been consulted.

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<sup>11</sup> Commission Implementing Decision C(2017)2585 of 27.4.2017 on a standardisation request to the European standardisation organisations in support of Directive (EU) 2016/2102 of the European Parliament and of the Council on the accessibility of the websites and mobile applications of public sector bodies.

- (33) The measures provided for in this Decision are in accordance with the opinion of the Committee established by Article 22 of Regulation (EU) No 1025/2012,

HAS ADOPTED THIS DECISION:

#### *Article 1*

##### *Requested standardisation activities*

1. The European Committee for Standardisation (CEN), the European Committee for Electrotechnical Standardisation (Cenelec) and the European Telecommunications Standards Institute (ETSI) (the European standardisation organisations (ESOs')) are requested to draft new harmonised standards listed in Table 1 of Annex I to this Decision and to revise existing European standards listed in Table 2 of Annex I to this Decision in support of Annex I and III to Directive (EU) 2019/882, by the deadlines set out in Annex I of this Decision.
2. The ESOs are requested to revise the harmonised standards listed in Table 1 of Annex II in support of the implementation of Article 4 of Directive (EU) 2016/2102 by the deadline set in that Annex.
3. The ESOs are requested to revise the European standardisation deliverables listed in Table 1 of Annex III by the deadline set in that Annex.
4. The standards and standardisation deliverables referred to in paragraphs 1, 2 and 3 shall meet the requirements set out in Annex IV.
5. The ESOs shall provide the Commission with the titles of the requested harmonised standards in all the official languages of the Union.

#### *Article 2*

##### *Work programme*

1. The ESOs shall prepare a joint work programme indicating all the standards and standardisation deliverables referred to in the first, second and third paragraphs of Article 1, the responsible ESO, the responsible technical bodies and a timetable for the execution of the requested standardisation activities in line with the deadlines set out in Annex I to III. The work programme shall also contain a description of which clauses or provisions of the standards referred to in Table 2 of Annex I and in Table 1 of Annex II are intended to be used without modification, which clauses or provisions will have to be amended, and in what area of the standards it is necessary to develop new provisions.
2. The ESOs shall submit the draft joint work programme to the Commission by 15 December 2022 and provide it with access to an overall project plan.
3. The ESOs shall inform the Commission of any amendments to the joint work programme.
4. The ESOs shall also ensure inclusiveness of the standardisation process for persons with disabilities and their representative organisations in this work. The work processes, meetings venues and documents shall be accessible for persons with disabilities and reasonable accommodation shall be provided upon request.
5. The standardisation work listed in Annex I, Annex II and Annex III shall take account of CEN/CLC Guide 6 "Guide for addressing accessibility in standards" or equivalent in their work.

*Article 3*  
*Reporting*

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 implementing the work programme referenced to in Article 2 and all elements therein.
2. The ESOs shall submit the first annual report to the Commission by 15 September 2023. Subsequent annual reports shall be submitted by 12 months after submission of previous reports each year.
3. The ESOs shall provide the Commission with the final report by 15 March 2027.
4. In addition to the reporting obligations set out in paragraphs 1 to 3, the ESOs shall promptly report to the Commission any major concerns relating to the scope of the request referred to in Article 1 and the deadlines set out in Annex I to III.

*Article 4*  
*Validity of the standardisation request*

If the ESOs do not accept the request referred to in Article 1 within a month of receiving it, the request may not constitute a basis for the standardisation activities referred to in that Article.

This Decision shall expire on 15 September 2027.

*Article 5*  
*Expiry of existing standardisation requests and repeal*

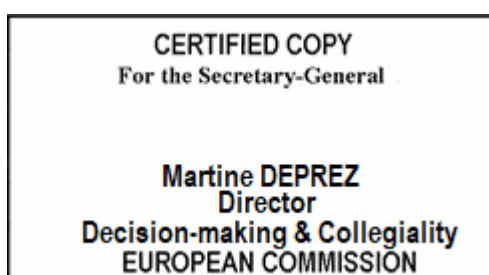
1. Standardisation mandates M/376 of 7 December 2005, M/420 of 21 December 2007 and M/473 of 1 September 2010 shall expire.
2. Implementing Decision C(2017)2585 is repealed.

*Article 6*  
*Addressees*

This Decision is addressed to the European Committee for Standardisation, the European Committee for Electrotechnical Standardisation and the European Telecommunications Standards Institute.

Done at Brussels, 14.9.2022

*For the Commission*  
*Helena DALLI*  
*Member of the Commission*





EUROPEAN  
COMMISSION

Brussels, 14.9.2022  
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ANNEXES 1 to 4

## **ANNEXES**

**to the**

### **COMMISSION IMPLEMENTING DECISION**

**on a standardisation request to the European standardisation organisations as regards  
the accessibility requirements of products and services in support of Directive (EU)  
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## **ANNEX I**

### **List of new standards to be drafted and 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**

| <b>Reference information</b> |                                                                                                                                                                                                                                                   | <b>Deadline for the adoption by the ESOs</b> |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 1.                           | Harmonised standard(s) setting up requirements on the accessibility of non-digital information related to products                                                                                                                                | 15 March 2026                                |
| 2.                           | Harmonised standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services <sup>1</sup> and training services) <sup>2</sup> .                                    | 15 March 2026                                |
| 3.                           | Harmonised standard for the accessibility and interoperability of emergency communications and for the answering of emergency communications by the public safety answering point (PSAPs) (including to the single European Emergency number 112) | 15 January 2027                              |

**Table 2: List of existing European standards to be revised and deadlines for their adoption as harmonised standards**

| <b>Reference information</b> |                                                                                                                                                 | <b>Deadline for the adoption by the ESOs</b> |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 1.                           | EN 301 549 Accessibility requirements for ICT products and services                                                                             | 15 September 2025                            |
| 2.                           | EN 17161:2019 Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users | 15 September 2025                            |
| 3.                           | EN 17210 Accessibility and usability of the built environment - Functional requirements                                                         | 15 September 2025                            |

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<sup>1</sup> To be understood as the use of relay services and related operational aspects, including **provision of accessible information about the possibility to use Relay services, including any prescription, registration or subscription information**

<sup>2</sup> This could include contact center, passenger assistance services, , non-emergency crucial support services (e.g. domestic violence victim support centers, public health emergency information centers, etc)



## **ANNEX II**

### **List of existing standards to be revised as referred to in Article 1(2)**

**Table 1: List of existing harmonised standards to be revised and deadlines for their adoption**

| <b>Reference information</b> |                                                                     | <b>Deadline for the adoption by the ESOs</b> |
|------------------------------|---------------------------------------------------------------------|----------------------------------------------|
| 1.                           | EN 301 549 Accessibility requirements for ICT products and services | 15 September 2025                            |

### **ANNEX III**

**Table 1: List of existing European Standardisation deliverables to be revised as referred to in Article 1(3)**

| <b>Reference information</b> |                                                                                                                                                                           | <b>Deadline for the adoption by the ESOs</b> |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 1.                           | CEN/CLC/ETSI TR 101551 Guidelines on the use of accessibility award criteria suitable for public procurement of ICT products and services in Europe                       | 15 January 2026                              |
| 2.                           | CEN/CLC/ETSI/TR 101 552 Guidance for the application of conformity assessment to accessibility requirements for public procurement of ICT products and services in Europe | 15 January 2026                              |

## **ANNEX IV**

### **Requirements for the standards referred to in Article 1**

#### **Part A. General requirements**

##### **1. Legal requirements to be supported by the harmonised standards**

The ESOs shall include in each harmonised standard a clear and precise description of the relationship between its content and the corresponding accessibility requirements set out in Annex I and III of Directive (EU) 2019/882 and in Article 4 of Directive (EU) 2016/2102 that it aims to cover. Each harmonised standard developed on the basis of the request referred to in Article 1 of this Decision shall refer to this Decision.

The ESOs shall include in each revised standard information on significant changes that were introduced in that standard

The harmonised standards shall support the application of relevant accessibility requirements referred to in Article 4 of Directive (EU) 2019/882 for products and services<sup>3</sup> under the scope set out in Article 2 and in Annex I and III to Directive (EU) 2019/882 and Article 4 of Directive (EU) 2016/2102.

The harmonised standards shall provide detailed technical scientific, processual or methodological specifications of the accessibility requirements, with regard to the design and production of products and provision of services with the purpose of allowing compliance with relevant accessibility requirements of Directive (EU) 2019/882.

The structure of a harmonised standard shall be such that a clear distinction can be made between its clauses and sub-clauses that are necessary for compliance with the accessibility requirements of Directive 2019/882 and those that are not. The relationship between the clauses and sub-clauses of a harmonised standard and the requirements of Directive 2019/882 shall be indicated in the Annexes Z to each standard. The accessibility requirements shall be taken into account from the beginning and throughout the entire process of developing of standards.

All the harmonised standards shall indicate in Annex Z the relationship between the clauses and sub-clauses of the harmonised standard and the requirements of section VI of Annex I of Directive 2019/882.

The harmonised standards shall set out specific provisions for specific accessibility requirements related to specific products and services, including related to the built environment where the services under the scope of this directive are provided, as set in Annex I and III of the Directive (EU) 2019/882. These specific provisions include methods for the verification of compliance with such provisions. Based on this request, the harmonised

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<sup>3</sup> Please see that for electronic communication services there is an exception of transmission services used for the provision of machine-to-machine services in article 2.2(a);

standards must not support any other legal requirements than those referenced in the first paragraph of this point 1 and in particular shall not:

- make any references to Directive 2019/882 and any other legal act referred therein or reproduce its requirements in their normative body;
- modify any definitions set by Directive 2019/882 or referred therein and in any other legal act referred therein or define any legally relevant terms not defined in Directive 2019/882 itself or in any other legal act referred therein;
- address any requirements, responsibilities, contractual arrangements or obligations for any economic operator including notified or other bodies or market surveillance authorities, and
- contain any provisions concerning conformity assessment procedures, related documents or technical file as regulated by Directive 2019/882 or any other legal act referred therein

Where a definition in a harmonised standard differs from a definition of the same term set out in Directive 2019/882 or any other legal act referred therein, the definitions in the harmonised standard has to be aligned to those in the legal acts.

There is no CE marking for services, so it is difficult for a consumer to find information about accessible services. In Directive 2019/882, Annex V includes requirements on information on services. In the development of new or revised harmonised standards, with requirements on services, provisions must be amended with specifications on how consumers can get information on the accessibility of the service and how to make complaints. This information must be published and accessible, according to Annex I of Directive 2019/882.

## **2. Legal requirements to be covered by an individual harmonised standard**

When a harmonised standard listed in Annex I to this Decision does not cover all the accessibility requirements which are applicable to the products and services or other EU legal acts falling under the scope of Directive (EU) 2019/882, the standard shall indicate in Annex Z information on the requirements applicable to those products and services or other EU legal acts that are not covered or only partially covered by it. Where a harmonised standard contains technical specifications that do not support the application of accessibility requirements set out in Annex I and Annex III to Directive (EU) 2019/882, such technical specifications shall be clearly distinguished from the specifications supporting the accessibility requirements.

Where appropriate, the harmonised standard shall include information as to whether a particular requirement is addressed with regard to the design, manufacturing, or packaging of the device.

## **Part B. Specific requirements for drafting new standards listed in Table 1 of Annex I**

### **1. Requirements for all standards**

The harmonised standards shall maximise the level of accessibility and ensure interoperability including with assistive devices in such a way as to maximise their foreseeable use by persons with disabilities. Standards shall reflect the generally acknowledged state of the art.

## 2. Requirements for specific standards

### 2.1 Standards on accessibility listed in Table 1 of Annex I

1. The harmonised standard setting up requirements on the accessibility of non-digital information related to products and services shall describe the technical solutions for accessibility to ensure conformity with the following requirements set out in Annex I of Directive 2019/882:

Annex I section I point 1 (a) and (b) and 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) e-books

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 and interoperability as well as provide information about the accessibility of the respective products and services, their compatibility with assistive technologies, and how to ensure<sup>4</sup> that the information is provided in accessible modes of communication and to ensure conformity with the following requirement set in Annex I of Directive 2019/882:

Section I.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<sup>5</sup>, including when using roaming services, to ensure conformity with the following requirements set out in Annex I of Directive 2019/882:

Section III, Section IV and Section V

This standard shall contain the relevant up-to-date provisions from ETSI Technical reports, specifications and guidance<sup>6</sup>.

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<sup>4</sup> Without duplicating the first standard in Table 1 of Annex I, namely the Harmonized standard(s) setting up requirements on the accessibility of non-digital information related to products

<sup>5</sup> This would include provisions related to Real Time text and Total conversation including for number based communication.

<sup>6</sup> Among possible relevant documents are ETSI TS 101 470: Total Conversation Access to Emergency Services, ETSI TR 103 201: Total Conversation for emergency communications; implementation guidelines, ETSI TS 103 479: Core elements for network independent access to emergency services, ETSI TR 103 708: RTT Multi-party Conference Calling, ETSI EG 202 320: Duplex Universal Speech and Text (DUST) communications, ETSI EG 202 843: Quality of ICT services; Definitions and methods for assessing the QoS parameters of the customer relationship stages other than utilizing, ETSI ES 202 975: Requirements for Relay Services

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

### **1. Requirements for all standards**

The harmonised standards shall maximise the level of accessibility and ensure interoperability including with assistive devices in such a way as to maximise their foreseeable use by persons with disabilities. Standards shall reflect the generally acknowledged state of the art. Standards listed in Table 2 of Annex I and Table 1 of Annex II shall be revised to describe the technical solutions for accessibility to ensure conformity with the accessibility requirements of Annex I and III of Directive 2019/882 and Article 4 of Directive (EU) 2016/2102, except those included in part B of this annex, namely those covered by new standards.

### **2. Requirements for specific standards**

2.1. 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 Annex I section I, II, III, IV, excluding point (f) of section IV on e-books of Directive 2019/882, except for those included in part B of this annex, namely those covered by new standards. It should be complementary with the new standards referred to in section B for example by addressing relay service requirements for accessibility, and consumer terminal accessibility to be used with and be applicable to emergency communications.

EN 301 549, the standard shall be revised to address:

- accessibility requirements of ICT devices (including e-books readers as dedicated or included in other devices such as PCs or smartphones)
- generic accessibility requirements for ICT-based service provision
- accessibility requirements for electronic communication services with regards to real-time text(RTT) and Total Conversation(TC) including for number based interpersonal communications services and including when using roaming services. These requirements should also refer to the enablement of these services in the core of the communication networks on which these services are being provided. These solutions should also be used for the 3<sup>rd</sup> standard in Table 1 of Annex I, namely, “Harmonised standard for the accessibility and interoperability of emergency communications and for the answering of emergency communications by the public safety answering point (PSAPs) (including to the single European Emergency number 112)” to ensure interoperability. In addition, the 3<sup>rd</sup> standard would include additional specific solutions as needed. Work should be done in agreement and coordination between the standardisation groups working on both standards and take account of already available work and deliverables (including on infrastructure) and in particular in view of technical specifications related to packet switched emergency communication infrastructure. It should also contain functional and service requirements for (interoperable) Total Conversation services (TC) including RTT.
- accessibility requirements for ICT-based application-specific services included in the scope of the European Accessibility Act. These requirements may also include QoS (Quality of Service) requirements. In the case of RTT and TC a reference terminal should be defined for conformity tests.

This existing harmonised standard EN 301 549: v3.2.1 2021 shall be updated to include relevant existing or revised provisions of ETSI technical reports or other relevant guidelines and documents<sup>7</sup>. However, this standardisation request does not include the update of those documents. Nevertheless the revised harmonised standards would require updated provisions of ETSI ES 202 975: Requirements for Relay Services.

The requirements set out in EN 17210 and EN 301 549 should be aligned avoiding contradictions.

2.2 Existing standard EN 17161:2019 covering accessibility following a Design for all approach shall be revised. The harmonised standard shall describe process-related and procedural solutions for the design, development and provision of services that fulfil the accessibility requirements set out in Annex I to Directive 2019/882 in accordance with Section VI thereof.

2.3. Existing standard EN 17210:2021 covering accessibility requirements of the built environment shall be revised. The harmonised standard shall describe where needed in more detail the functional solutions linking where feasible to technical solution for accessibility to ensure conformity with Annex III of Directive 2019/882.

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 as well as address the accessibility statement required by this Directive.

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<sup>7</sup> Among possible relevant documents are ETSI TS 101 470: Total Conversation Access to Emergency Services, ETSI TR 103 201: Total Conversation for emergency communications; implementation guidelines, ETSI TS 103 479: Core elements for network independent access to emergency services, ETSI TR 103 708: RTT Multi-party Conference Calling, ETSI EG 202 320: Duplex Universal Speech and Text (DUST) communications, ETSI EG 202 843: Quality of ICT services; Definitions and methods for assessing the QoS parameters of the customer relationship stages other than utilisation, ETSI ES 202 975: Requirements for Relay Services.

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

### **Standard (H) EN 301549**

#### **1. General requirements for websites and mobile apps**

The requested harmonised standard(s) shall cover accessibility specifications to be followed when designing, constructing, maintaining and updating websites and mobile applications. They shall provide generally applicable accessibility specifications. Those specifications in support of the implementation of Article 4 of Directive (EU) 2016/2102 shall ensure at least the level of accessibility already established by clauses 9, 10 and 11 of EN 301 549 : v3.2.1 2021.

In order to satisfy the accessibility requirements of the Directive, such harmonised standard(s) shall provide the detailed technical specifications of those requirements, especially with regard to the perceivability, operability, understandability and robustness, see point 2.

The established accessibility specifications shall be coordinated and aligned with the relevant industry specifications in particular, the specifications established or under development by the World Wide Web Consortium (W3C) in its Web Accessibility Initiative (WAI) and, when relevant, shall be aligned with other globally relevant specifications (e.g. US Access Board's Section 508 Standards).

#### **1.1 Requirements on perceivability**

The requested harmonised standard(s) shall ensure that information and user interface components are presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented (it cannot be imperceptible to all of their senses).

#### **1.2 Requirements on operability**

The requested harmonised standard(s) shall ensure that user interface components and navigation are operable. This means that users must be able to operate the interface (the interface should not require interaction that a user cannot perform).

#### **1.3 Requirements on understandability**

Information and the operation of user interface shall be understandable. This means that users must be able to understand the information as well as the operation of the user interface (the content or operation should not be beyond their understanding).

#### **1.4 Requirements on robustness**

Content shall be robust enough to be interpreted in a reliable manner by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content as technologies advance (as technologies and user agents evolve, the content has to remain accessible).

2 The requirements and their description coincide with the Four Principles of Accessibility defined in W3C Web Contents Accessibility Guidelines (WCAG) 2.1. If any of these requirements are not met, users with disabilities may not be able to use the Web.

#### **3. Additional requirements for mobile applications**

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.

The conceptual and technical specificities of mobile devices shall be duly taken into account when establishing accessibility specifications for mobile applications.

The harmonised standard(s) shall include information about the Commission Implementing Decision (EU) 2018/1523 on the accessibility statement fulfilling article 7 of Directive (EU) 2016/2102.

**Part E. Specific requirements for revision of existing European standardisation deliverables listed in Table 1 of Annex III**

These technical reports could be combined in their revision.