



# **Towards an accessible digital publishing ecosystem**

**Cristina Mussinelli – 15 July 2021**

Fondazione LIA is a no profit organization created in 2014 by the **Italian Publisher Association** (AIE) along with the **Italian Blind Union** (UICI)

In 2019 **Associazione Italiana Dislessia** (AID) and **Biblioteca dei Ciechi Regina Margherita** joined as institutional members



Our mission is **promoting books and reading in all its forms** through education, information, awareness and research in this area and **expanding access for print impaired people to publishing products through research and technological innovation**

# Active in the International network



LIA actively participates in the main international working groups for the definition of accessibility standards and to promote solutions aimed at increasing the accessibility of publications, websites, platforms and apps:

- **W3C (World Wide Web Consortium)** - international non-governmental organization which aims to develop all the potential of the Internet and manages its standards: Publishing Business Group; Publishing Working Group; EPUB3 Community Group; CSS Print Community Group.– WCAG - WAI EOWG
- **EDRLab - (European Digital Reading Laboratory)** - financed among others by the Ministry of Culture and the French Ministry of Development, aims to develop reading and DRM solutions that take into account accessibility;
- **DAISY Consortium** - international consortium of organizations whose purpose is to promote accessibility: TIES Transition to access EPUB; Reading systems; Standard DIAGRAM; TIES Production group;
- **ISO** - the most important organization in the world for the definition of technical standards: group OT UNI/CT 014 /SC 04 "Automation and documentation"

# The new EU legislative framework



## EU Directive on the accessibility requirements for products and services

<b>June 2019</b>	<ul style="list-style-type: none"><li>• Approved by the Eu Commission</li></ul>
<b>June 28<sup>th</sup>, 2022</b>	<ul style="list-style-type: none"><li>• EU Member States should adopt and publish national laws, regulations and administrative provisions to comply with the Act.</li><li>• They shall immediately communicate the text of those provisions to the Commission.</li></ul>
<b>June 28<sup>th</sup>, 2025</b>	<ul style="list-style-type: none"><li>• Will enter in force in all EU Member States</li></ul>
<b>June 28<sup>th</sup>, 2030</b>	<ul style="list-style-type: none"><li>• Member State should submit the first report by the European Commission on the application of the Act. This reporting must be done every five years thereafter</li></ul>

- It aims at improving the functioning of the European internal market for accessible products and services by removing the obstacles created by divergent legislation, thus increasing their availability for the benefit of people with disabilities and the elderly (estimate 80 million in the EU)
- It will apply to all products and services made available on the market from **June 28, 2025**
- **All businesses**, including international publishers, e-book service providers and HW and SW e-reader developers **willing to sell their products and services in the European market** need to comply with the Directive's accessibility requirements

- The Directive applies to many **products and services** such as consumer general purpose computer hardware systems (such as personal computers, notebooks, smartphones and tablets) and operating systems for those hardware systems, self-service terminals (i.e. payment or ticketing terminals), consumer banking services, electronic communication services, payment services, services to access audio-visual media services
- **It also includes e-books, dedicated reading software, e-reading devices and e-commerce**
- For both products and services the Directive provides for:
  - mandatory compliance with the defined standard requirements
  - the possibility of certifying conformity
  - the presence of European and national enforcement authorities

The legislation foresees:

- mandatory compliance with defined standards and technical specifications
- CE marking for products (Regulation 765/ 2008)
- the possibility of certifying conformity
- the presence of European and national enforcement authorities: Market surveillance (compliance, safeguards) + Authority responsible for compliance of services (check, safeguards) + penalties

## Annexes

- Annex I – Accessibility requirements and functional performance criteria
- Annex II – Examples
- Annex IV – Conformity assessment of products
- Annex V- Information on services meeting accessibility requirements (general terms and conditions)
- Annex VI – Assessment of disproportionate burden



# Which standards?

For now, high-level requirements are described in the Directive, but the Commission expects that the so-called **EU Harmonized standards** or **Technical specifications** should be adopted within two years from the approval

In the publishing industry standards refer to:

- File formats
- Web sites and online platforms
- HW and SW reading solutions
- Metadata

# E-books as a service. What does it mean?

The term “service provider” includes publishers as well as all the other economic operators involved in e-book distribution:

- distributors and online retailers, e-commerce websites and mobile apps, online platforms
- software e-reading solutions
- DRM solutions
- metadata

**Hardware e-book readers are instead considered as products**

# Every actor should play its part



## Publishers and content creators

-  Produce born accessible publications following guidelines
-  Checking accessibility
-  Certification for accessibility
-  Create metadata

## Digital distributor or aggregators

-  Ingest and distribute accessibility metadata
-  Implement non-blocking accessibility DRMS




## Books in print catalogues

-  Ingest and distribute accessibility metadata
-  Create a catalog of born accessible publications available on the market

## Digital bookstores or digital libraries

-  Create graphical user interface following accessibility guidelines
-  Display accessibility metadata to end users
-  Expose accessibility metadata to search engines

## Reading solutions

-  Create graphical user interface following accessibility metadata
-  Display accessibility metadata to end users
-  Implement non-blocking accessibility DRMS

# Enforcements and penalties

The Directive foresees the presence of Market Surveillance Authorities, both at European and national levels, that will be responsible for checking compliance of products and services with the requirements of the Directive

The Directive foresees some possible exceptions, in particular for:

- **microenterprises**
- when producing an accessible version causes a **disproportionate burden**
- when a **fundamental alteration** of the content of the product would be required

In these cases, the provision to market surveillance authorities of detailed and documented information documenting an exemption request is mandatory

Specific features of special volumes like comics, children's books and art books should be considered in light of all the applicable accessibility requirements

# Illegitimate reasons

The Directive explicitly lists these reasons as **ILLEGITIMATE** in order to be exempt:

- **lack of priority**
- **lack of time**
- **lack of knowledge**

In regards with these considerations, **every actor in the e-book value chain is strongly encouraged to start adapting its workflows**, acquire the technical specific knowledge and embrace a culture of accessibility as soon as possible in order to be effectively ready by June 2025

**Ready to start?**



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