

DIGITALEUROPE observations on the amended Presidency text for the Directive on the accessibility of public sector bodies' websites

Brussels, 10 June 2015

DIGITALEUROPE welcomes the amended text on the Proposal for a Directive of the European Parliament and of the Council on the accessibility of public sector bodies' websites as proposed by the Latvian Presidency¹. DIGITALEUROPE supports these amendments and would like to make the following observations, while encouraging progression of the directive:

Scope regarding which entities: The definition of a public sector body by reference to point (4) of Article 2(1) of Directive 2014/24/EU is sensible and unambiguous. This also ties nicely with that directive as a whole the objective of which is that accessibility must be considered in public procurement decisions.

Scope regarding types of content: Clarification is needed for "archived documents". It is sensible to leave out of scope scanned versions of historic hard copy documents, however electronically authored documents need consideration. Regarding non-web format documents and content in video and audio format, WCAG 2.0 "AA" compliance covers these content types and we would not like to see them excluded. Indeed, this would not result in promoting full AA compliance. We acknowledge that live audio and video are excluded – as this is part of AAA compliance - but agree that they should be encouraged.

Definitions: Careful consideration needs to be given as to whether a website is the appropriate granularity with respect to provisions of the directive regarding new and existing content. If we assume that most public sector bodies have existing websites, the first 12 months after transposition will see very little uptake, as in our opinion there are very few new and unpublished websites. Furthermore, we caution against an existential debate as to what is a website and what constitutes a new website. For instance, is a redesigned website a new one or an existing one? While the end goal is for fully accessible websites, an intermediate step should encourage as much accessible content as possible – new content being new pages, new documents associated with pages, new functions and workflows, etc. By reintroducing the concept of new content, wider and earlier uptake and awareness would be promoted.

Monitoring and Reporting: The requirement for Member States to report by 54 months (4 years and 6 months) after entry into force should be seen as the latest possible deadline. Earlier and intermittent reporting should be encouraged.

Transposition: We agree with the transposition timeframes and note the discussion above regarding new vs. existing websites. The more content that comes under the first deadline, the wider awareness of the issues at hand will be.

Education Outreach: Within the web-development community, there is a lack of awareness about accessibility standards and a lack of skills required to build accessible websites. DIGITALEUROPE encourages the Commission to work with Member States to establish educational and training programmes to increase the adoption of web accessibility standards in order to support the implementation of this directive.

¹Doc. 7888/15

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ABOUT DIGITALEUROPE

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