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Baarslag, A.

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# Hurdles on the European Road to Accessibility

*Aafje Baarslag*

Aafje is an alumna of the MA program *Book and Digital Media Studies* (2020-2021), where she focused on heritage and book history. She currently works as a coordinator for the Dutch Publishers Organization, where one of her tasks is to organize workshops for Dutch publishers on the requirements for accessible media. In her free time, she reads horror and fantasy books and also writes her own stories.

In the European Union, around 80 million people deal with some kind of disability (European Commission, Employment, Social Affairs & Inclusion). Disability should not stop people from being able to participate and grow in the digital world. As such, in 2019 the EU proposed the *European Accessibility Act* ('EAA'), which "aims to improve the functioning of the internal market for accessible products and services, by removing barriers created by divergent rules in Member States" (European Commission, *European Accessibility Act*). Under this Act, the most important pieces of media have been considered, such as computers, ATMs, smartphones, audio-visual media, public transport, banking, and e-books, the latter being the main subject of this essay. Of the various mediums discussed in the Act, e-books in particular are to be made accessible to people with a visual impairment or cognitive disability that hinders them from reading, be it through blindness, dyslexia or anything else. In Europe, this is a group of more than 30 million people.

As provided in the Act, companies are expected to have the groundwork for legislation at the ready by June 28, 2022, and full legislation ready to go into effect by June 28, 2025. Eventually, businesses will hopefully be able to serve a complete clientele with the help of the EAA. By implementing these requirements, businesses should be able to serve a market in which nobody is excluded, and people with a disability are able to consume the same media as everyone else and engage with everything the digital world has to offer.

In many cases, steps towards an accessible future have already been taken. As I write this text, Microsoft Word automatically shows me if the document is well-structured according to general guidelines. Even website-building platforms like WordPress will tell if an article on the website would be accessible to every user. However, these are large companies, with many employees and an international market presence. In the publishing world, this matter is slightly different. Many publishing houses are not large, nor do they have the luxury of being able to hire external parties to 'fix the accessibility question'.

Every country will have a different path laid out before it to implement the regulations, just like the changes will be more substantial for one

company than the other. The purpose of this essay, therefore, is to give a general overview of the challenges that the book industry is currently facing at the dawn of the new regulations, focusing primarily on the examples happening within the Netherlands. Here, there is still much to be done to form the actual groundwork needed to implement the legislation. With this, it should of course be mentioned that this essay can only describe a small part of the requested implementations, and it is not only the Netherlands that deals with these issues, but every EU member state.

## Guidelines

Before the hurdles can be looked at, it is important to know what the minimum requirements of the EAA are that would suffice for a business to comply with the given expectations. In general, the *Web Content Accessibility Guidelines* (WCAG) – a series of guidelines created by the *Web Accessibility Initiative* (WAI) of the *World Wide Web Consortium* (W3C) – have become the international standard to be used in the process of providing accessible content. The guidelines of WCAG 2.1 are divided into four categories: *perceivable*, *operable*, *understandable*, and *robust*. By the length of the guidelines, it is impossible to discuss these in full, and should instead be viewed on the website of W3C (W3C, 2018). More important is the structure of WCAG 2.1, which is ordered from category A to AAA. The more As a business collects, the more accessible their content is. To give an example: under the category *understandable* falls guideline 3.1: *readable*. In order to qualify for an A level, the content needs to be written in a natural language that a web page can be programmed in; an AA level requires that each passage or phrase can be programmatically determined, with the exceptions of some specific words; and finally, an AAA level requires a mechanism to be used to find meanings of unusual words, being able to identify abbreviations, a version of the text readable for a lower secondary education level, and a way of identifying specific pronunciation of words (W3C). Right now, content producers are only required to have accessibility up to level AA. While AAA would be ideal, it is in some cases

impossible to provide. In cases where the text is unchangeable, as is the case with books, not every AAA level is manageable. Turning the e-book of a heavy novel back into a simpler use of language would after all change the complete story.

In the case of publishers, most adaptation is needed in web shops and, especially, e-books. In general, a recommended format has already been established: EPUB. This format shares values with open web technology that is used to build websites (like HTML, CSS and XML), and because of that, is easy to produce and maintain (Audrain et al. 3). However, just using an accessible format does not mean that an e-book is completely accessible itself. Hardware used to read e-books must be able to support all necessary functions, like text-to-speech. But accessibility goes beyond the physicality of the object and already starts with the hidden information of the product: the metadata.

## Metadata

Metadata is of high importance when it comes to making a work findable. In the case of a standard book, the metadata will tell the buyer about aspects such as themes and the number of pages. For a visually impaired person, metadata can be of even greater importance. They will need to know if they will be able to read the book in the first place. Is the piece, for example, compatible with their screen reader? By adding *Accessibility Metadata*, the client will be able to know what functions have been added to the text, so that they can buy a title without regretting it later (at least on the technical side).

To ease the implementation of such metadata, Benetech founded the *Accessibility Metadata Project* in 2013. With this project, they wished to bring *Accessibility Metadata* to schema.org, which is the biggest collection of vocabulary, and is used for over 10 million websites and applications (Garrish, 2021). This metadata is crucial within the EAA, for without this data even the most accessible book can still be impossible to find for its target audience. The employment of accessibility data for the

book industry has made good progress, but in many countries, such as the Netherlands, effective metadata information is still not implemented consistently. Internal metadata (standard information provided by the publisher) and/or external metadata (information for the sales by (web-) shops) are in most cases, nonexistent or incomplete, undermining the effectiveness of the scheme.

In list 196 of *Onix* – the software primarily used for book metadata – the codes for accessibility have been implemented (Onix codelists). The list itself also shows the factors publishers would need to keep in mind, for both their *born digital* and *made digital* materials. It asks for reading orders, alternative descriptions, color, audio, dyslexia readability and much more. There are many important things to consider, but at the same time, they are also just that – a lot. And this in itself provides a further problem. At the time of writing – March 2022 – no further clarification has been provided by the EU on the situation surrounding the backlog of e-books. Currently, publishers have a large number of old e-books, most of which are not completely accessible. Should these publishers be required to turn the backlog into an accessible format to be able to keep them for sale, the easier option for them is to get rid of this backlog completely, which would cause a massive loss for every lover of books.

The issue around the backlog of e-books shows that the EAA will need to make certain exceptions in order to function well without unintentionally causing many older titles to be lost in a non-physical form.

## Exceptions and problems

Already exceptions have been made within the EAA itself. To begin with, it does not apply to every type of book. Those that rely on image-heavy content (i.e., art books, comics and graphic novels) are excluded from needing a fully accessible version, as these images cannot be turned into mere image descriptions without losing full purpose (nor is anyone waiting on an in-detail description of *The Night Watch*).

Currently, the following other exemptions have been made by the EAA, to assist businesses. Websites in particular have been given strong exceptions, although these might not be applicable to every institution. Such exceptions are:

- Pre-recorded time-based media published before June 2025
- Office file formats published before June 2025
- Online maps, provided essential information is also given in a different, accessible way
- Third-party content that is not funded, developed or controlled by an organization that has to follow the EAA
- Archive content that won't be updated after June 2025 (Kuik)

The main exception in the EAA relates to micro-businesses. Here, however, a *problem* with the Act can also be found. The EAA is a European law, following European standards. The definition of a micro-business in the eyes of the EU, and in that of the Netherlands have some differences, as the tables below show:

**Table 1** Business categorization according to the EU  
(European Commission, *SME Definition*)

Category	Staff headcount	Turnover	Balance sheet total
Medium-sized	<250	<€50 mln	<€43 mln
Small	<50	<€10 mln	<€10 mln
Micro	<10	<€2 mln	<€2 mln

**Table 2** Business categorization according to the Netherlands  
(Kamer van Koophandel)

Category	Staff headcount	Turnover	Balance sheet total
Medium-sized	<250	<€40 mln	<€20 mln
Small	<50	<€12 mln	<€6 mln
Micro	<10	<€700.000	<€350.000

When looking at these numbers, it is clear that a micro-business under the Dutch classification is much smaller than the European one. This means that were the EAA to be implemented in its current form, many businesses in the Netherlands would not be required to make their content accessible. As a result, the majority of e-books would still not be required to be fully accessible. Of course, it is allowed for the Dutch government to make these EAA requirements mandatory for any companies that are not classified as micro-business under Dutch law. Chances are that the Dutch government will not take these extra steps, and even if they would, accepting a new law can take years and would leave current *micro*-businesses with little to no time to implement the EAA before 2025.<sup>1</sup>

These are just a small number of inconsistencies and vague notions that can currently be found in EAA. It is an Act that, even now, is still in the stage of negotiation where every party tries to be as prepared as they can.

## Implementation

As the deadline to start the implementation of the EAA approaches quickly, and 2025 also looms closer than some might like, it should be expected that most members of the EU are working on the accessibility of their content. On March 1<sup>st</sup>, 2022, the organization *Inclusive Publishing* published the results of a survey hosted through the *European Inclusive Publishing Forum*, a collaboration network used to support the implementation of the EAA (Inclusive Publishing). In this survey, only 14 out of 27 EU members responded. These 14 however make up for 74% of the European population. The other 13 are speculated not to have replied as a result of communication difficulties, or unwillingness to do so when no important activity is taking place in said country (Inclusive Publishing). What is

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1 This is also being lobbied for Digital Learning Tools, which currently don't have to be accessible and are not mentioned in the EAA at all.

interesting to see is that despite the implementation of the EAA being mandatory for each EU member, many do not have the large support that would be necessary to ensure a smooth transition. Half of the responding countries get government support, half have a stakeholder group that can give advice, and only four countries seem to have an active training programme to educate publishers. Closely related to these responses, three themes have come up that should be given more attention. These are the following:

- *Awareness-raising*: more communication with the publishers is necessary for them to understand their role and responsibility in this process.
- *Training*: more countries wish to have an active program to educate publishers on the best ways to implement the EAA.
- *Clarity over EAA requirements*: as has been shown in this paper, the precise requirements to meet the standards of the EAA are in many cases still unclear, which is concerning as the matter becomes more and more pressing (Inclusive Publishing).

In the Netherlands, such training started in the summer of 2021, as provided by the *Toegankelijk Publiceren aan de Bron* (TPUB2) project. This is a joint project between accessibility foundations and the branch organizations of the general and educational publishers that is hosted through *inclusiefpubliceren.nl*. It serves as a continuation of the original TPUB project from 2018-2019 and now helps publishers by giving educational workshops. As helpful as the workshops given by this project are, they only target the publishers that are members of the branch organizations. These publishers, however, often outsource their production to other companies and these companies are in some cases unfamiliar with what is expected of them. Although education can in no way instruct companies precisely with a step-by-step guide, they are given the general knowledge needed to prepare for the future, and this is crucial for every step in the production of books. Solutions for this problem are being looked at, but it does show where priorities are often placed.

## Conclusion

In a continuously changing society, it is a great improvement that disabled people are finally more included. The implementation of these new laws, however, leaves much to be desired. Expectations are unclear, education is lacking for each step in the chain, and a large number of companies may never have to deal with these new laws. Although some of this seems discouraging, it should not be. The path is there, though overgrown and treacherous it still might seem, and it is now that it should be trodden. The only way to go is forward, to ensure everyone can partake in continuously modernizing society.

## Works Cited

- Audrain, Luc et al. "European Accessibility Act: report on the state of the art of publishing standards." *Federation of European Publishers*, 29 June 2021, [www.fep-fee.eu/IMG/pdf/20210629\\_european\\_accessibility\\_act\\_report\\_on\\_the\\_state\\_of\\_the\\_art\\_of\\_publishing\\_standards.pdf?1892/9929f3564221902d4ca19b53c0d4d9aa2118bb62](http://www.fep-fee.eu/IMG/pdf/20210629_european_accessibility_act_report_on_the_state_of_the_art_of_publishing_standards.pdf?1892/9929f3564221902d4ca19b53c0d4d9aa2118bb62).
- European Union, European Commission. *European Accessibility Act*. Employment, Social Affairs and Inclusion Committee, 2019, [www.ec.europa.eu/social/main.jsp?catId=1202](http://www.ec.europa.eu/social/main.jsp?catId=1202).
- . *European Accessibility Act: Improving the accessibility of products and services in the single market*. Employment, Social Affairs & Inclusion Committee, [www.ec.europa.eu/social/BlobServlet?docId=14869&langId=en](http://www.ec.europa.eu/social/BlobServlet?docId=14869&langId=en).
- . *SME definition*. Internal Market, Industry, Entrepreneurship and SMEs Committee, [www.ec.europa.eu/growth/smes/sme-definition\\_en](http://www.ec.europa.eu/growth/smes/sme-definition_en).
- Garrish, Matt. "Welcome and work plan." 2 November 2021, [www.w3.org/community/all-y-discov-vocab/2021/11/02/welcome-and-work-plan/](http://www.w3.org/community/all-y-discov-vocab/2021/11/02/welcome-and-work-plan/).
- Inclusief Publiceren. *TPUB2*, 7 April 2022, [www.inclusiefpubliceren.nl/tpub2](http://www.inclusiefpubliceren.nl/tpub2).

Inclusive Publishing. *European Accessibility*, 1 March 2022, [www.inclusivepublishing.org/blog/european-accessibility-act-baseline-readiness-survey/](http://www.inclusivepublishing.org/blog/european-accessibility-act-baseline-readiness-survey/).

Kuik, Kyra. “The European Accessibility Act: Frequently asked questions.” 21 March 2021, [www.siteimprove.com/en/blog/the-european-accessibility-act-frequently-asked-questions/](http://www.siteimprove.com/en/blog/the-european-accessibility-act-frequently-asked-questions/).

“List 196: E-publication Accessibility Details.” Onix Codelists, 30 March 2022, [www.onix-codelists.io/codelist/196](http://www.onix-codelists.io/codelist/196).

“Waaruit bestaat de jaarrekening?” Kamer van Koophandel, 5 April 2022, [www.kvk.nl/inschrijven-en-wijzigen/deponeren/jaarrekening-deponeren/waaruit-bestaat-de-jaarrekening](http://www.kvk.nl/inschrijven-en-wijzigen/deponeren/jaarrekening-deponeren/waaruit-bestaat-de-jaarrekening).

“Web Content Accessibility Guidelines (WCAG) 2.1.” World Wide Web Consortium, 5 June 2018, [www.w3.org/TR/2018/REC-WCAG21-20180605/](http://www.w3.org/TR/2018/REC-WCAG21-20180605/).