

RegCORE – Client Alert

The European Accessibility Act (EAA) and its national transposition in the Grand Duchy of Luxembourg

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QuickTake

The European Accessibility Act (EAA) and its national implementation in the Grand Duchy of Luxembourg, represent significant legislative efforts to harmonise accessibility requirements related for goods and services within the EU Single Market. The EAA, as a European Union (EU) Directive, mandates that EU Member States transpose its provisions into national law by 28 June 2022, with these national laws becoming effective as of 28 June 2025. The implementation process in the Grand Duchy of Luxembourg was concluded by the adoption of the law of 8 March 2023, as amended by the law of 29 August 2023 (Law). This EU RegCore provides a detailed comparison of the EAA and the Law, highlighting the specific adaptations made by Luxembourg to align with the EAA while addressing national particularities.

Key Takeaways

The EAA was implemented into the Luxembourg legal framework through the Law, hence complementing several pre-existing laws in this area.

For instance, the accessibility of the built environment, as outlined in Article 4, Paragraph 4 and Annex III of the EEA, is enshrined in the law of 7 January 2022, which pertains to the accessibility of public places, public roads and collective residential buildings (**2022 Law**). The 2022 Law mandates accessibility not only for public places, public roads and collective housing buildings in the public domain but also extends this obligation to the private domain, exceeding the EAA's scope for the built environment.

Additionally, measures related to the reception of emergency communications directed to the single European emergency number '112' or other national emergency numbers is dealt with through separate laws and regulations.

The remaining sections of the EAA have been transposed into the Law with a delay of almost one year. As of the writing of this EU RegCore, no *règlement grand-ducal* has been published and the OSAPS (as defined below) website is not yet operational.

Adhering to its long-standing principle of transposing **the whole directive and nothing but the directive**, the Luxembourg legislator directly references Annex I of the EEA, which sets the accessibility requirements for products and services. The Law regulates general accessibility conformity requirements (under Chapter 3), obligations of economic operators in the product sector (under Chapter 4), obligations of service providers (under Chapter 5), the conformity assessment and CE-marking procedure and the surveillance of products and services. The newly introduced obligations for manufacturers, importers and dealers (as addressed in the EAA under Articles 7, 9 and 10) are also reflected in the Law (Articles 8, 11 and 12).

Particular attention should be paid to Chapter 2 of the Law, which establishes a new office for monitoring the accessibility of products and services (*Office de la surveillance de l'accessibilité des produits et services*, **OSAPS**) reporting to the Minister for Disability Policy (*ministre ayant la Politique pour personnes handicapées dans ses attributions*). The missions of the OSAPS include notably:

1. Conducting surveillance of products and the conformity of services in the Luxembourg market, including verifying CE marking conditions and the EU declaration of conformity as provided by the Law;
2. Implementing appropriate control mechanisms to verify that derogations from accessibility requirements are justified;
3. Providing guidelines and tools for micro-enterprises;
4. Informing and raising public awareness about OSAPS, its responsibilities, decisions, the identity of national market surveillance authorities, and how to contact them, making this information available in appropriate formats upon request;
5. Collecting necessary data for statistical studies on the needs of disabled people and those with functional limitations regarding the accessibility of products and services covered by the EAA, in collaboration with competent national bodies;
6. Transmitting necessary information to the market surveillance department of the Luxembourg Institute for Standardisation, Accreditation, Safety, and Quality of Products and Services (ILNAS) to establish and update the general market surveillance program, which consolidates sectoral market surveillance programs.

Comparative Overview

This section provides a simplified overview of how the provisions of the EAA have been transposed into the Law, divided into compliance obligations:

1. <u>Accessibility requirements for products and services</u>	
<p>EU - EAA</p> <p>Article 4 and Annex I specify the detailed requirements for the accessibility of products and services.</p>	<p>Luxembourg - Law</p> <p>Article 6 adopts these accessibility requirements with direct reference to Annex I to the EEA.</p> <p>Article 6 Paragraph 6 allows the OSAPS to publish examples on its website to help economic operators to meet accessibility requirements (these examples are yet to be published as of the date of this EU RegCore).</p>
2. <u>Conformity assessment procedure</u>	
<p>EU - EAA</p> <p>Annex IV describes the internal production control and the preparation of technical documentation.</p> <p>Manufacturers (Art. 7), importers (Art. 9) and dealers (Art. 10) must all guarantee that the conformity assessment procedure has been followed.</p>	<p>Luxembourg - Law</p> <p>Annex I to the Law includes this procedure.</p> <p>Manufacturers (Article 9), importers (Article 11) and dealer (Article 12) must ensure that the procedure has been followed.</p>
3. <u>CE marking</u>	

EU - EAA

Articles 16-18 and Annex IV require the CE marking for compliant products.

4. Obligations of economic operators

EU - EAA

Articles 7-12 define the obligations of manufacturers, importers and distributors.

5. Market surveillance

EU - EAA

Articles 19, 20 emphasise the role of market surveillance authorities. It lays down general requirements for market surveillance without detailed national procedures.

6. Documentation retention

EU - EAA

Article 14(3) requires the documentation to be retained for five years.

7. Responsibilities of service providers

EU - EAA

Article 13 requires service providers to make their services accessible.

8. Microenterprise

EU - EAA

The Directive includes an exemption for micro-enterprises that provide or offer services (Article 4(5)).

Art. 4(6) requires the Member States to set up guidelines to facilitate the micro enterprises' compliance with the EAA.

9. Presumption of conformity

EU - EAA

The Directive also provides for a presumption of conformity in Art. 15, without allowing for specific national adaptations.

10. Mandates to issue regulations

EU - EAA

The Directive does not provide for any specific (national) authorisation to issue regulations.

11. Disproportionate burdens

EU - EAA

The Directive mentions disproportionate burdens in Article 14, without detailing national specifications.

Luxembourg - Law

These requirements are reproduced in Articles 18-20 and Annex I.

Luxembourg - Law

Articles 9-14 further specify these obligations and add national requirements.

Luxembourg - Law

Articles 21-22 use analogous language and do not create further obligations.

Luxembourg - Law

Article 16(3) also requires a five-year retention period.

Luxembourg - Law

Article 15 specifies these requirements for service providers.

Luxembourg - Law

Micro-enterprises that offer or provide services are exempt from the requirements as set out in Article 6(4).

Article 6(5) appoints the OSAPS to provide guidelines to facilitate the micro enterprises' compliance with the Law.

Luxembourg - Law

Products and services that comply with harmonised standards or technical specifications are deemed compliant (Article 17).

Luxembourg - Law

Similarly, the Law does not designate any specific national authority to issue regulations, although the assessment of OSAPS' members should notably be subject to a *règlement grand-ducal*.

Luxembourg - Law

There are no specific regulations on disproportionate burdens for economic operators in Article 16.

Annex I of the EAA and its national transposition in the Law

As mentioned above, the wording of the Law refers to Annex I of the EAA, as amended by the acts of the European Commission adopted in accordance with Article 26 of the EAA. The Luxembourg legislator has thus not undertaken any specific transcription work.

Annex II of the EAA and its correspondence with Annex I

Below is a consolidated table that includes the requirements in Section I of Annex I and the corresponding examples provided under Annex II of the EAA.

<p>SECTION I:</p> <p>EXAMPLES RELATED TO GENERAL ACCESSIBILITY REQUIREMENTS FOR ALL PRODUCTS COVERED BY THIS DIRECTIVE IN ACCORDANCE WITH ARTICLE 2(1)</p> <p style="text-align: center;">[...]</p> <p style="text-align: center;">Article 2</p> <p style="text-align: center;">Scope</p> <p>1. <i>This Directive applies to the following products placed on the market after 28 June 2025:</i></p> <p>(a) <i>consumer general purpose computer hardware systems and operating systems for those hardware systems;</i></p> <p>(b) <i>the following self-service terminals:</i></p> <p style="margin-left: 40px;">(i) <i>payment terminals;</i></p> <p style="margin-left: 40px;">(ii) <i>the following self-service terminals dedicated to the provision of services covered by this Directive:</i></p> <ul style="list-style-type: none"> - <i>automated teller machines;</i> - <i>ticketing machines;</i> - <i>check-in machines;</i> - <i>interactive self-service terminals providing information, excluding terminals installed as integrated parts of vehicles, aircrafts, ships or rolling stock;</i> <p>(c) <i>consumer terminal equipment with interactive computing capability, used for electronic communications services;</i></p> <p>(d) <i>consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services; and</i></p> <p>(e) <i>e-readers.</i></p> <p style="text-align: center;">[...]</p>	
REQUIREMENTS IN SECTION I OF ANNEX I	EXAMPLES
1. The provision of information	
(a) <i>the information on the use of the product provided on the product itself (labelling, instructions and warning) shall be:</i>	
(i) <i>made available via more than one sensory channel;</i>	Providing visual and tactile information or visual and auditory information indicating the place where to introduce a card in a self-service terminal so that blind persons and deaf persons can use the terminal.
(ii) <i>presented in an understandable way;</i>	Using the same words in a consistent manner, or in a clear and logical structure, so that persons with intellectual disabilities can better understand it.
(iii) <i>presented to users in ways they can perceive;</i>	Providing tactile relief format or sound in addition to a text warning so that blind persons can perceive it.
(iv) <i>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;</i>	Allowing that text can be read by persons who are visually impaired.

(b) <i>the instructions for use of a product, where not provided on the product itself but made available through the use of the product or through other means such as a website, including the accessibility functions of the product, how to activate them and their interoperability with assistive solutions shall be publicly available when the product is placed on the market and shall:</i>	
(i) <i>be made available via more than one sensory channel;</i>	Providing electronic files which can be read by a computer using screen readers so that blind persons can use the information.
(ii) <i>be presented in an understandable way;</i>	Using the same words in a consistent manner, or in a clear and logical structure, so that persons with intellectual disabilities can better understand them.
(iii) <i>be presented to users in ways they can perceive;</i>	Providing subtitles when video instructions are provided.
(iv) <i>be 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;</i>	Allowing that the text can be read by persons who are visually impaired.
(v) <i>with regard to content, be made available in text formats that can be used for generating alternative assistive formats to be presented in different ways and via more than one sensory channel;</i>	Printing in Braille, so that a blind person can use them.
(vi) <i>be accompanied by an alternative presentation of any non-textual content;</i>	Accompanying a diagram with a text description identifying the main elements or describing key actions.
(vii) <i>include a description of the user interface of the product (handling, control and feedback, input and output) which is provided in accordance with point 2; the description shall indicate for each of the points in point 2 whether the product provides those features;</i>	No example provided
(viii) <i>include a description of the functionality of the product which is provided by functions aiming to address the needs of persons with disabilities in accordance with point 2; the description shall indicate for each of the points in point 2 whether the product provides those features;</i>	No example provided
(ix) <i>include a description of the software and hardware interfacing of the product with assistive devices; the description shall include a list of those assistive devices which have been tested together with the product.</i>	Including a socket and software in automated teller machines which will allow the plugging of a headphone which will receive the text on the screen in the form of sound.
2. User interface and functionality design <i>The product, including its user interface, shall contain features, elements and functions, that allow persons with disabilities to access, perceive, operate, understand and control the product by ensuring that:</i>	
(a) <i>when the product provides for communication, including interpersonal communication, operation, information, control and orientation, it shall do so via more than one sensory channel; this shall include providing alternatives to vision, auditory, speech and tactile elements;</i>	Providing instructions in the form of voice and text, or by incorporating tactile signs in a keypad, so that persons who are blind or hard of hearing can interact with the product.
(b)	Offering in a self-service terminal in addition to the

<i>when the product uses speech it shall provide alternatives to speech and vocal input for communication, operation control and orientation;</i>	spoken instructions, for example, instructions in the form of text or images so that deaf persons can also perform the action required
(c) <i>when the product uses visual elements it shall provide for flexible magnification, brightness and contrast for communication, information and operation, as well as ensure interoperability with programmes and assistive devices to navigate the interface;</i>	Allowing users to enlarge a text, to zoom in on a particular pictogram or to increase the contrast, so that persons who are visually impaired can perceive the information.
(d) <i>when the product uses colour to convey information, indicate an action, require a response or identify elements, it shall provide an alternative to colour;</i>	In addition of giving a choice to press the green or the red button for selecting an option, providing in written on the buttons what the options are, in order to allow person who are colour blind to make the choice.
(e) <i>when the product uses audible signals to convey information, indicate an action, require a response or identify elements, it shall provide an alternative to audible signals;</i>	When a computer gives an error signal, providing a written text or an image indicating the error, so as to allow deaf persons to apprehend that an error is occurring.
(f) <i>when the product uses visual elements it shall provide for flexible ways of improving vision clarity;</i>	Allowing for additional contrast in foreground images so that persons who have low vision can see them.
(g) <i>when the product uses audio it shall provide for user control of volume and speed, and enhanced audio features including the reduction of interfering audio signals from surrounding products and audio clarity;</i>	Allowing the user of a telephone to select the volume of the sound and reduce the interference with hearing aids so that persons who are hard of hearing can use the telephone.
(h) <i>when the product requires manual operation and control, it shall provide for sequential control and alternatives to fine motor control, avoiding the need for simultaneous controls for manipulation, and shall use tactile discernible parts;</i>	Making touch screen buttons bigger and well separated so that persons with tremor can press them.
(i) <i>the product shall avoid modes of operation requiring extensive reach and great strength;</i>	Ensuring that buttons to be pressed do not require much force so that persons who have motor impairments can use them.
(j) <i>the product shall avoid triggering photosensitive seizures;</i>	Avoiding flickering images so that persons who get seizures are not at risk.
(k) <i>the product shall protect the user's privacy when he or she uses the accessibility features;</i>	Allowing the use of headphones when spoken information is provided by automated teller machines.
(l) <i>the product shall provide an alternative to biometrics identification and control;</i>	As an alternative to fingerprint recognition, allowing users who cannot use their hands to select a password for locking and unlocking a phone.
(m) <i>the product shall ensure the consistency of the functionality and shall provide enough, and flexible amounts of, time for interaction;</i>	Ensuring that the software reacts in a predictable way when a particular action is performed and providing enough time to enter a password so that is easy to use for persons with intellectual disabilities.
(n) <i>the product shall provide software and hardware for interfacing with the assistive technologies;</i>	Offering a connection with a refreshable Braille display so that blind persons can use the computer.
(o) <i>the product shall comply with the following sector-specific requirements:</i>	Examples of sector-specific requirements
(i)	No example provided

<p><i>self-service terminals:</i></p> <p>(i) shall provide for text-to-speech technology;</p> <p>(ii) shall allow for the use of personal headsets;</p> <p>(iii) where a timed response is required, shall alert the user via more than one sensory channel;</p> <p>(iv) shall give the possibility to extend the time given;</p> <p>(v) shall have an adequate contrast and tactilely discernible keys and controls when keys and controls are available;</p> <p>(vi) shall not require an accessibility feature to be activated in order to enable a user who needs the feature to turn it on;</p> <p>(vii) when the product uses audio or audible signals, it shall be compatible with assistive devices and technologies available at Union level, including hearing technologies such as hearing aids, telecoils, cochlear implants and assistive listening devices;</p>	
<p>(ii)</p> <p><i>e-readers shall provide for text-to-speech technology;</i></p>	<p>No example provided</p>
<p>First indent</p> <p><i>consumer terminal equipment with interactive computing capability, used for the provision of electronic communications services:</i></p> <p><i>shall, when such products have text capability in addition to voice, provide for the handling of real time text and support high fidelity audio;</i></p>	<p>Providing that a mobile phone should be able to handle real time text conversations so that persons who are hard of hearing can exchange information in an interactive way.</p>
<p>(iii)</p> <p>Fourth indent</p> <p><i>shall avoid interferences with assistive devices;</i></p>	<p>Allowing the simultaneous use of video to display sign language and text to write a message, so that two deaf persons can communicate with each other or with a hearing person.</p>
<p>(iv)</p> <p><i>consumer terminal equipment with interactive computing capability, used for accessing audio visual media services shall make available to persons with disabilities the accessibility components provided by the audiovisual media service provider, for user access, selection, control, and personalisation and for transmission to assistive devices.</i></p>	<p>Ensuring that subtitles are transmitted through the set top box for their use by deaf persons.</p>
<p>3. Support services: No example provided</p> <p><i>Where available, support services (help desks, call centres, technical support, relay services and training services) shall provide information on the accessibility of the product and its compatibility with assistive technologies, in accessible modes of communication.</i></p>	

SECTION II:

EXAMPLES RELATED TO ACCESSIBILITY REQUIREMENTS FOR PRODUCTS IN ARTICLE 2(1), EXCEPT FOR THE SELF-SERVICE TERMINALS REFERRED TO IN ARTICLE 2(1)(b)	
<p>[...]</p> <p>Article 2</p> <p>Scope</p> <p>1. This Directive applies to the following products placed on the market after 28 June 2025:</p> <p>(a) consumer general purpose computer hardware systems and operating systems for those hardware systems;</p> <p>(b) the following self-service terminals:</p> <p style="margin-left: 20px;">(i) payment terminals;</p> <p style="margin-left: 20px;">(ii) the following self-service terminals dedicated to the provision of services covered by this Directive:</p> <ul style="list-style-type: none"> - 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; <p>(c) consumer terminal equipment with interactive computing capability, used for electronic communications services;</p> <p>(d) consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services; and</p> <p>(e) e-readers.</p> <p>[...]</p>	
REQUIREMENTS IN SECTION II OF ANNEX I	EXAMPLES
<p>Accessibility requirements related to products in Article 2(1), except for the self-service terminals referred to in Article 2(1)(b)</p> <p>In addition to the requirements of Section I, the packaging and instructions of products covered by this Section shall be made accessible, in order to maximise their foreseeable use by persons with disabilities. This means that:</p>	
Packaging and instructions of products	
<p>(a) the packaging of the product including the information provided in it (e.g. about opening, closing, use, disposal), including, when provided, information about the accessibility characteristics of the product, shall be made accessible; and, when feasible, that accessible information shall be provided on the package;</p>	<p>Indicating in the packaging that the phone contains accessibility features for persons with disabilities.</p>
<p>(b) the instructions for the installation and maintenance, storage and disposal of the product not provided on the product itself but made available through other means, such as a website, shall be publicly available when the product is placed on the market and shall comply with the following requirements:</p>	
<p>(i) be available via more than one sensory channel;</p>	<p>Providing electronic files which can be read by a computer using screen readers so that blind persons can use the information.</p>
<p>(ii) be presented in an understandable way;</p>	<p>Using the same words in a consistent manner, or in a clear and logical structure, so that persons with intellectual disabilities can better understand it.</p>
<p>(iii) be presented to users in ways they can perceive;</p>	<p>Providing tactile relief format or sound when a text warning is present so that blind persons receive the warning.</p>
<p>(iv) be 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;</p>	<p>Providing that the text can be read by persons who are visually impaired.</p>
<p>(v) content of instructions shall be made available in text formats</p>	<p>Printing in Braille, so that a blind person can read it.</p>

<i>that can be used for generating alternative assistive formats to be presented in different ways and via more than one sensory channel; and</i>	
<i>(vi) instructions containing any non-textual content shall be accompanied by an alternative presentation of that content.</i>	Supplementing a diagram with a text description identifying the main elements or describing key actions.

SECTION III:	
EXAMPLES RELATED TO GENERAL ACCESSIBILITY REQUIREMENTS FOR ALL SERVICES COVERED BY THIS DIRECTIVE IN ACCORDANCE WITH ARTICLE 2(2)	
[...]	
<i>2. Without prejudice to Article 32¹, this Directive applies to the following services provided to consumers after 28 June 2025:</i>	
<ul style="list-style-type: none"> <i>(a) electronic communications services with the exception of transmission services used for the provision of machine-to-machine services;</i> <i>(b) services providing access to audiovisual media services;</i> <i>(c) 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> <ul style="list-style-type: none"> <i>(i) websites;</i> <i>(ii) mobile device-based services including mobile applications;</i> <i>(iii) electronic tickets and electronic ticketing services;</i> <i>(iv) delivery of transport service information, including real-time travel information; this shall, with regard to information screens, be limited to interactive screens located within the territory of the Union; and</i> <i>(v) interactive self-service terminals located within the territory of the Union, except those installed as integrated parts of vehicles, aircrafts, ships and rolling stock used in the provision of any part of such passenger transport services;</i> <i>(d) consumer banking services;</i> <i>(e) e-books and dedicated software; and</i> <i>(f) e-commerce services.</i> 	
[...]	
REQUIREMENTS IN SECTION III OF ANNEX I	EXAMPLES
<i>General accessibility requirements related to all services covered by this Directive in accordance with Article 2(2)</i>	
<i>The provision of services in order to maximise their foreseeable use by persons with disabilities, shall be achieved by:</i>	
The provision of services	
<i>(a) ensuring the accessibility of the products used in the provision of the service, in accordance with Section I of this Annex and, where applicable, Section II thereof;</i>	No example provided
<i>(b) providing information about the functioning of the service, and where products are used in the provision of the service, its link to these products as well as information about their accessibility characteristics and interoperability with assistive devices and facilities:</i>	

¹ Article 32: Transitional measures

1. Without prejudice to paragraph 2 of this Article, Member States shall provide for a transitional period ending on 28 June 2030 during which service providers may continue to provide their services using products which were lawfully used by them to provide similar services before that date.
Service contracts agreed before 28 June 2025 may continue without alteration until they expire, but no longer than five years from that date.
2. Member States may provide that self-service terminals lawfully used by service providers for the provision of services before 28 June 2025 may continue to be used in the provision of similar services until the end of their economically useful life, but no longer than 20 years after their entry into use.

(i) <i>making the information available via more than one sensory channel;</i>	Providing electronic files which can be read by a computer using screen readers so that blind persons can use the information.
(ii) <i>presenting the information in an understandable way;</i>	Using the same words in a consistent manner or in a clear and logical structure so that persons with intellectual disabilities can better understand it.
(iii) <i>presenting the information to users in ways they can perceive;</i>	Including subtitles when a video with instructions is provided.
(iv) <i>making the information content available in text formats that can be used to generate alternative assistive formats to be presented in different ways by the users and via more than one sensory channel;</i>	Providing that a blind person can use a file by printing it in Braille.
(v) <i>presenting 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;</i>	Providing that the text can be read by persons who are visually impaired.
(vi) <i>supplementing any non-textual content with an alternative presentation of that content; and</i>	Supplementing a diagram with a text description identifying the main elements or describing key actions.
(vii) <i>providing electronic information needed in the provision of the service in a consistent and adequate way by making it perceivable, operable, understandable and robust;</i>	When a service provider offers a USB-key containing information about the service, providing that information is accessible.
(c) <i>making websites, including the related online applications, and mobile device-based services, including mobile applications, accessible in a consistent and adequate way by making them perceivable, operable, understandable and robust;</i>	Providing text description of pictures, making all functionality available from a keyboard, giving users enough time to read, making content appear and operate in a predictable way, and providing compatibility with assistive technologies, so that persons with diverse disabilities can read and interact with a website.
(d) <i>where available, support services (help desks, call centres, technical support, relay services and training services) providing information on the accessibility of the service and its compatibility with assistive technologies, in accessible modes of communication.</i>	No example provided

SECTION IV:	
EXAMPLES RELATED TO ADDITIONAL ACCESSIBILITY REQUIREMENTS FOR SPECIFIC SERVICES	
REQUIREMENTS IN SECTION IV OF ANNEX I	EXAMPLES
<i>Additional accessibility requirements related to specific services</i>	
<i>The provision of services in order to maximise their foreseeable use by persons with disabilities, shall be achieved by including functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities and ensure interoperability with assistive technologies:</i>	
Specific services	
(a) <i>Electronic communications services, including emergency communications referred to in Article 109(2) of Directive (EU) 2018/1972:</i>	
(i) <i>providing real time text in addition to voice communication;</i>	Providing that persons who are hard of hearing could write and receive text in an interactive manner and in real time.
(ii)	Providing that deaf persons can use sign language to

<i>providing total conversation where video is provided in addition to voice communication;</i>	communicate among themselves.
(iii) <i>ensuring that emergency communications using voice, text (including real time text) is synchronised and where video is provided is also synchronised as total conversation and is transmitted by the electronic communications service providers to the most appropriate PSAP.</i>	Providing that a person who has speech and hearing impairments and chooses to use a combination of text, voice and video, knows that the communication is transmitted through the network to an emergency service.
(b) <i>Services providing access to audiovisual media services:</i>	
(i) <i>providing electronic programme guides (EPGs) which are perceivable, operable, understandable and robust and provide information about the availability of accessibility;</i>	Providing that a blind person can select programmes on the television.
(ii) <i>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.</i>	Supporting the possibility to select, personalise and display 'access services' such as subtitles for deaf persons or persons who are hard of hearing, audio description, spoken subtitles and sign language interpretation, by providing means for effective wireless coupling to hearing technologies or by providing user controls to activate 'access services' for audiovisual media services at the same level of prominence as the primary media controls.
(c) <i>Air, bus, rail and waterborne passenger transport services except for urban and suburban transport services and regional transport services:</i>	
(i) <i>ensuring the provision of information on the accessibility of vehicles, the surrounding infrastructure and the built environment and on assistance for persons with disabilities;</i>	No example provided
(ii) <i>ensuring the provision of information about smart ticketing (electronic reservation, booking of tickets, etc.), real-time travel information (timetables, information about traffic disruptions, connecting services, onwards travel with other transport modes, etc.), and additional service information (e.g. staffing of stations, lifts that are out of order or services that are temporarily unavailable).</i>	No example provided
(d) <i>Urban and suburban transport services and regional transport services: ensuring the accessibility of self-service terminals used in the provision of the service in accordance with Section I of this Annex.</i>	No example provided
(e) <i>Consumer banking services:</i>	
(i) <i>providing identification methods, electronic signatures, security, and payment services which are perceivable, operable, understandable and robust;</i>	Making the identification dialogues on a screen readable by screen readers so that blind persons can use them.
(ii) <i>ensuring that the information is understandable, without exceeding a level of complexity superior to level B2 (upper intermediate) of the Council of Europe's Common European Framework of Reference for Languages.</i>	No example provided
(f) <i>E-books:</i>	
(i) <i>ensuring that, when an e-book contains audio in addition to text, it then provides synchronised text and audio;</i>	Providing that a person with dyslexia can read and hear the text at the same time.

(ii) <i>ensuring that e-book digital files do not prevent assistive technology from operating properly;</i>	Enabling synchronized text and audio output or by enabling a refreshable Braille transcript.
(iii) <i>ensuring access to the content, the navigation of the file content and layout including dynamic layout, the provision of the structure, flexibility and choice in the presentation of the content;</i>	Providing that a blind person can access the index or change chapters.
(iv) <i>allowing alternative renditions of the content and its interoperability with a variety of assistive technologies, in such a way that it is perceivable, understandable, operable and robust;</i>	No example provided
(v) <i>making them discoverable by providing information through metadata about their accessibility features;</i>	Ensuring that information on their accessibility features is available in the electronic file so that persons with disabilities can be informed.
(vi) <i>ensuring that digital rights management measures do not block accessibility features.</i>	Ensuring that there is no blocking, for example that technical protection measures, rights management information or interoperability issues do not prevent the text from being read aloud by the assistive devices, so that blind users can read the book.
(g) <i>E-Commerce services:</i>	
(i) <i>providing the information concerning accessibility of the products and services being sold when this information is provided by the responsible economic operator;</i>	Ensuring that available information on the accessibility features of a product is not deleted.
(ii) <i>ensuring the accessibility of the functionality for identification, security and payment when delivered as part of a service instead of a product by making it perceivable, operable, understandable and robust;</i>	Making the payment service user interface available by voice so that blind persons can make online purchases independently.
(iii) <i>providing identification methods, electronic signatures, and payment services which are perceivable, operable, understandable and robust.</i>	Making the identification dialogues on a screen readable by screen readers so that blind persons can use them.

About us

PwC Legal is assisting a number of financial services firms and market participants in forward planning for changes stemming from relevant related developments. We have assembled a multi-disciplinary and multijurisdictional team of sector experts to support clients navigate challenges and seize opportunities as well as to proactively engage with their market stakeholders and regulators.

Moreover, we have developed a number of RegTech and SupTech tools for supervised firms, including PwC Legal's [Rule Scanner](#) tool, backed by a trusted set of managed solutions from PwC Legal Business Solutions, allowing for horizon scanning and risk mapping of all legislative and regulatory developments as well as sanctions and fines from more than 750 legislative and regulatory policymakers and other industry voices in over 170 jurisdictions impacting financial services firms and their business.

Moreover, in leveraging our Rule Scanner technology, we offer a further solution for clients to digitise financial services firms' relevant internal policies and procedures, create a comprehensive documentation inventory with an established documentation hierarchy and embedded glossary that has version control over a defined backward plus forward looking timeline to be able to ensure changes in one policy are

carried through over to other policy and procedure documents, critical path dependencies are mapped and legislative and regulatory developments are flagged where these may require actions to be taken in such policies and procedures.

If you would like to discuss any of the developments mentioned above, or how they may affect your business more generally, please contact any of our key contacts or PwC Legal's RegCORE Team via de_regcore@pwc.com or our [website](#).

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