

ANNEX 1

Requirements set out in Annex I, Section III of Directive (EU) 2019/882 General accessibility requirements related to all services covered by this Directive (EU) 2019/882 in accordance with Article 2(2)			
Provision	Text of the provision in Annex I, Section III of Directive (EU) 2019/882	Application of EPUB 1.1 Accessibility regarding Annex I, Section III of Directive (EU) 2019/882	Correlating provisions or sections in EPUB Accessibility 1.1 (WCAG) and ONIX for Books 3
Section III	The provision of services in order to maximise their foreseeable use by persons with disabilities, shall be achieved by:		
(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;	This requirement is not related to e-books content or production: It relates to reading systems and other products used to serve the e-book to the end-user.	Not covered in this implementing act. Covered by Harmonised standards related to products.
(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:	EPUB Accessibility 1.1 has a section on Discoverability that requires e-books to include metadata about their accessibility features, so users can easily find out if an e-book meets their accessibility needs.	<ul style="list-style-type: none"> • EPUB Accessibility 1.1, Section 2 (Discoverability).
		ONIX for Books makes it possible to properly inform the end user of accessibility features	<ul style="list-style-type: none"> • ONIX Codelist 81 and 196 (ONIX Codelists Issue 67)
(b) (i)	making the information available via more than one sensory channel;	EPUB Accessibility 1.1 ensures information is presented in ways that do not rely solely on one sense (like shape, color, size, visual location, orientation, or sound). This corresponds to WCAG success criteria set in the next column.	<ul style="list-style-type: none"> • WCAG 2.2 Success Criterion 1.1.1 Non-text Content (level A). • WCAG 2.2 Success Criterion 1.3.1 Info and Relationships (level A). • WCAG 2.2 Success Criterion 1.3.3 Sensory Characteristics (level A). • WCAG 2.2 Success Criterion 1.4.1 Use of Color (level A). <p>In case the e-book contains multimedia content (audio or video):</p>

			<ul style="list-style-type: none"> • WCAG 2.2 Success Criterion 1.2.1 Audio-only and Video-only (Prerecorded) (level A). • WCAG 2.2 Success Criterion 1.2.2 Captions (Prerecorded) (level A). • WCAG 2.2 Success Criterion 1.2.3 Audio Description or Media Alternative (Prerecorded) (level A)
(b) (ii)	presenting the information in an understandable way;	EPUB Accessibility 1.1 requires e-book content creators to make content to be understandable, such as identifying the main language of the content and language changes within the content.	<ul style="list-style-type: none"> • WCAG 2.2 Principle 3. Understandable (level AA).
(b) (iii)	presenting the information to users in ways they can perceive;	EPUB Accessibility 1.1 requires content to be perceivable, including those who cannot see the structure of the content.	<ul style="list-style-type: none"> • WCAG 2.2 Principle 1. Perceivable (level A).
(b) (iv)	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;	EPUB Accessibility 1.1 requires e-books to work well with assistive technologies, such as screen readers and refreshable braille devices.	<ul style="list-style-type: none"> • WCAG 2.2 level AA
(b) (v)	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;	EPUB Accessibility 1.1 requires that the user can change the visual appearance of the text according to their needs.	<ul style="list-style-type: none"> • WCAG 2.2 Success Criterion 1.4.3 Contrast (Minimum) (level AA). • WCAG 2.2 Success Criterion 1.4.4 Resize Text (level AA). • WCAG 2.2 Success Criterion 1.4.10 Reflow (level AA). • WCAG 2.2 Success Criterion 1.4.12 Text Spacing (level AA).
(b) (vi)	supplementing any non-textual content with an alternative presentation of that content; and	EPUB Accessibility 1.1 requires the provision of text alternatives for images and, in case the e-book contains multimedia content, also captions and audio	<ul style="list-style-type: none"> • WCAG 2.2 Success Criterion 1.1.1 Non-text Content (level A). <p>In case the e-book contains multimedia content (audio or</p>

		descriptions.	video): <ul style="list-style-type: none"> • WCAG 2.2 Success Criterion 1.2.1 Audio-only and Video-only (Prerecorded) (level A). • WCAG 2.2 Success Criterion 1.2.2 Captions (Prerecorded) (level A). • WCAG 2.2 Success Criterion 1.2.3 Audio Description or Media Alternative (Prerecorded) (level A).
(b) (vii)	providing electronic information needed in the provision of the service in a consistent and adequate way by making it perceivable, operable, understandable and robust;	Provision of information is covered by EPUB Accessibility 1.1, in section Discoverability that is about accessibility metadata.	<ul style="list-style-type: none"> • EPUB Accessibility 1.1, Section 2 (Discoverability).
		Presentation of this information is not related to e-books, it is a requirement for reading systems, e-commerce websites, and platforms.	<p>Not covered in this implementing act.</p> <p>Covered by Harmonised standards related to electronic information</p>
(c)	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;	This requirement is not related to e-books production: It is for other actors of the supply chain such as e-book retailers or digital libraries.	<p>Not covered in this implementing act.</p> <p>Covered by Harmonised standards related to websites</p>
(d)	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.	This requirement is not related to e-books production: It is for support services of other actors of the supply chain such as e-book retailers or digital libraries.	<p>Not covered in this implementing act.</p> <p>Covered by Harmonised standards related to support services</p>

ANNEX 2

Requirements set out in Annex I, Section IV(f) of Directive (EU) 2019/882			
Additional accessibility requirements related to e-books			
Provision	Text of the provision in Annex I, Section IV of Directive (EU) 2019/882	Application of EPUB 1.1 Accessibility regarding Annex I, Section IV of Directive (EU) 2019/882	Correlating provisions or sections in EPUB Accessibility 1.1 (WCAG) and ONIX for Books 3
Section IV	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:		
(f)	E-books:		
(f) (i)	ensuring that, when an e-book contains audio in addition to text, it then provides synchronised text and audio;	In case the e-book contains audio, EPUB 3.3 supports synchronized text and audio through a feature called media overlays, which effectively syncs the text with the corresponding audio narration.	<ul style="list-style-type: none"> • EPUB 3.3 – 9. Media overlays
(f) (ii)	ensuring that e-book digital files do not prevent assistive technology from operating properly;	EPUB Accessibility 1.1 requires e-books to work well with assistive technologies, like screen readers, by ensuring proper labeling, keyboard accessibility, and no interference with assistive technologies.	<ul style="list-style-type: none"> • WCAG 2.2 Conformance Requirement 4: Only Accessibility-Supported Ways of Using Technologies. • WCAG 2.2 Conformance Requirement 5: Non-Interference. • WCAG 2.2 Success Criterion 4.1.2 Name, Role, Value (level A). • WCAG 2.2 Success Criterion 2.1 Keyboard Accessible (level A).
(f) (iii)	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	EPUB Accessibility 1.1 requires e-books to have proper navigation, adaptable layouts that can reflow text, and allow the flexibility in presentation.	<ul style="list-style-type: none"> • EPUB 3.3 – 7.4.2. The TOC nav element. • EPUB Accessibility 1.1 – 3.4.1 Page Navigation.

	content;		<ul style="list-style-type: none"> • WCAG 2.2 Guideline 1.3 Adaptable (level A). • WCAG 2.2 Success Criterion 1.4.10 Reflow (level AA).
(f) (iv)	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;	EPUB Accessibility 1.1 requires e-books to work well with assistive technologies, such as screen readers and refreshable braille devices.	<ul style="list-style-type: none"> • WCAG 2.2
(f) (v)	making them discoverable by providing information through metadata about their accessibility features;	EPUB Accessibility 1.1 has a section on Discoverability that requires e-books to include metadata about their accessibility features, so users can easily find out if an e-book meets their accessibility needs.	<ul style="list-style-type: none"> • EPUB Accessibility 1.1, Section 2 (Discoverability).
		ONIX for Books makes it possible to properly inform the end user of accessibility features	<ul style="list-style-type: none"> • ONIX Codelist 81 and 196 (ONIX Codelists Issue 67)
(f) (vi)	ensuring that digital rights management measures do not block accessibility features.	EPUB Accessibility 1.1 recommends that Digital Rights Management tools (DRM) should not interfere with the accessibility features of e-books.	<ul style="list-style-type: none"> • EPUB Accessibility 1.1, Section 5 (Distribution).