Manifest on convergence of e-book accessibility standards

Standardized regulations for the accessible readability of e-books and other digital formats

From July 2025, all newly published e-books must be accessible for people with disabilities. This is regulated by the "European Accessibility Act", which was transposed into German law by the "Barrierefreiheitsstärkungsgesetz". E-books must then be accessible without barriers. This means, among other things, that they can be read aloud and enlarged by assistive technologies and can be easily grasped by people with visual or reading impairments, for example. Accessibility is implemented according to technical specifications and standards.

E-books are often produced in either EPUB or PDF format. According to the current regulations, it depends on the technical format what needs to be considered when complying with accessibility standards. There is an urgent need for clarification here; explicit regulations must be created!

Insufficient specification for e-books

The European standardisation bodies were commissioned with mandate 587 to take over the standardisation for the European Accessibility Act. E-books were explicitly excluded. The mandate states: "In line with feedback received from European Publishers and confirmed by representative organisations of persons with disabilities referring to the availability of EPUB accessibility technical specifications under W3C e-books and dedicated software should be excluded from this request."

With regard to e-books, reference is therefore made to the existing technical specification for EPUB (EPUB Accessibility 1.1) of the World Wide Web Consortium (W3C) instead of adapting the European standard EN 301 549 accordingly.

However, this technical specification of the W3C falls short of the European standard EN 301 549 in terms of accessibility requirements. In practice, this means that an e-book in EPUB format must only conform to WCAG 2.0 single-A criteria. For e-books that are published in PDF, it is not clear what technical specifications

would apply. If EN 301 549 chapter 10 applies, this would mean that stricter requirements apply, e.g. contrast thresholds.

Both the W3C EPUB specification and the European standard are based on the Web Content Accessibility Guidelines (WCAG), which are also a W3C standard, with regard to accessibility requirements. The difference between the W3C EPUB specification and the European standard is due to the fact that the W3C EPUB specification refers to an outdated version - WCAG 2.0 instead of the current WCAG 2.2. Secondly, the EPUB specification only requires conformance level A of WCAG, while the European standard requires the higher conformance level AA of WCAG.

It is unreasonable that a lower presumption of conformity with the European Accessibility Act (EAA) can be derived from a difference in format. Similarly, it is not convincing that the accessible design follows different regulations depending on the format, as a source document is usually converted into either EPUB or PDF.

Call for Action

The European standard EN 301 549 contains accessibility requirements of WCAG conformance level AA for websites, documents and other digital formats. In order to make these requirements binding for e-books in the future, we call for the additional inclusion of all e-book formats in the European standard EN 301 549.

Also, for the W3C EPUB Accessibility guidelines, we call for raising the conformance level from WCAG 2.0 A to WCAG 2.2 AA, in order to have the same baseline for e-books in both, PDF and EPUB3 formats.

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