

# The impact of the "accessibility" directive on e-commerce sites



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## 1 INTRODUCTION

### 1.1 An international and European framework already long-established

The recognition and protection of the rights of persons with disabilities are not recent concerns, but are part of an international and European legal framework that has been built over several decades.

- The Treaty of Amsterdam (1997) introduced an explicit non-discrimination clause on the grounds of disability, paving the way for a dedicated European policy.
- The Charter of Fundamental Rights of the European Union (2000) prohibits any discrimination based on disability (Article 21) and recognizes the right of persons with disabilities to measures promoting their autonomy and integration (Article 26).
- The Treaty of Lisbon (2009) granted this Charter the same legal value as the EU treaties.
- The Treaty on the Functioning of the European Union (TFEU) requires the EU to combat discrimination related to disability in its policies and gives it the legislative means to act (Articles 10 and 19).
- The United Nations Convention on the Rights of Persons with Disabilities (CRPD) (2006) enshrines accessibility as a fundamental principle. The EU and its Member States ratified it in 2011, thereby strengthening their commitment to implementing an inclusive policy.

These founding texts show that the issue of the rights of persons with disabilities is part of a strong and longstanding legal framework, involving clear obligations for the States and the EU.

In the area of websites and mobile applications, a specific text already existed in the European Union for public authorities: Directive (EU) 2016/2102 aims to ensure, in the public sector, accessibility based on four principles:

1. **Perceptibility (perceivable):** Information and interface elements must be presented in a way that can be perceived by all, including through adapted solutions such as screen readers.
2. **Operability (operable):** Interfaces and navigation systems must be usable by all people, including those with motor or cognitive limitations.

3. **Comprehensibility (understandable):** Content and interfaces must be simple to understand, both in terms of language and functionality, to avoid any confusion for the user.
4. **Robustness (robust):** Content must be designed to be correctly interpreted by various types of technologies, including those intended to assist people with disabilities.

These principles have served as the basis not only for organizations working globally to establish standards in the field (WCAG, RGAA, etc.), but also as principles explicitly included in Directive 2019/882 analysed below.

## **1.2 A European framework still far from harmonization – Importance of national laws and standards**

The European Accessibility Act, or directive on accessibility, is the result of three years of negotiations since the first proposal on 2 December 2015; it aims to "contribute to the proper functioning of the internal market" by approximating the national provisions of Member States.

This text does not prescribe in detail how to practically implement accessibility obligations, but rather aims to set out common requirements of a general nature without imposing detailed technical solutions on how to make products and services accessible, thus leaving room for innovation and standards.

## **2 PRODUCTS AND SERVICES COVERED - COMPLIANCE TIMELINE - SCOPE AND INTRINSIC LOGIC OF THE DIRECTIVE**

### **2.1 Products and services covered**

Article 2 of the directive distinguishes between products and services.

Among the products covered by the directive: computers and operating systems; payment terminals; smartphones and other equipment allowing access to telecommunication services; television equipment including digital television services; e-readers and e-books.

Among the services covered: telephone services; services providing access to audiovisual media services; certain elements of air, road, rail and maritime transport services such as websites, mobile services, electronic tickets, information; consumer banking services; e-commerce.

The e-commerce services included correspond to "services supplied at a distance, via websites, services integrated on mobile devices, by electronic means and at the individual request of a consumer, with a view to concluding a consumer contract" (art. 3, 30).

It should be specified that, according to official commentary, this concerns e-commerce websites for their public part, but also account management interfaces and other sections accessible by subscription or limited access.

It should be noted that Article 2.4 excludes certain website and mobile application content from the scope of the directive, in particular:

- "contents of websites and mobile applications that are neither funded nor developed by the concerned economic operator, and that are not under the control of that operator." An online platform, of the user generated content type, is therefore subject to the directive as regards its design and access to advertisements, while the advertisements themselves, posted by visitors, fall outside the scope.
- "content of websites and mobile applications that are considered to be archives, that is, that only present content that is not updated or modified after 28 June 2025."

## 2.2 Compliance timeline

The directive applies to the products covered, placed on the market after 28 June 2025 (art. 2.1).

The directive applies to the services covered, provided to consumers after 28 June 2025 (art. 2.2).

However, for services, a transitional period has been established, ending on 28 June 2030, during which service providers may continue to offer their services using products that they legally used to provide similar services before this date. In other words, and in summary: all e-commerce websites (including mobile applications) must be accessible:

- For new services, from June 2025 onwards;
- For existing services, from June 2030 onwards.

A new service or new functionality added to an existing service after June 2025 must comply in terms of accessibility from the time it is made available. For example, if a chatbot is added to an e-commerce site that previously did not have one, the site itself is considered existing and benefits from the extension to 2030, while the chatbot added must be considered a new service.

## 2.3 Disabilities covered

The definition of a person with a disability was one of the major obstacles within the European Union, as each country has its own tradition and deviates more or less from the definition adopted in the United Nations Convention of 13 December 2006.

The directive refers to “persons who have a long-term physical, mental, intellectual or sensory impairment which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.”

Disability, in the sense of the directive, must therefore not be understood in its common sense but in relation to the objective of inclusion and equality.

A situation that would ordinarily be described as normal may therefore, under the directive, constitute a disability. One may think, for example, of age. Recital 4 is explicit: the text includes “persons with physical, mental, intellectual or sensory impairments, age-related impairments or any other limitation of human body performance, whether permanent or temporary, which in interaction with various barriers may limit access to products and services and result in a situation that requires adaptation of those products and services to their particular needs.”

## 2.4 Importance of the annexes

The directive includes annexes whose importance must not be underestimated, as they contain the added value for anyone seeking to become compliant.

### **Annex I – Accessibility requirements for products and services**

Section I: General requirements for all products covered by the directive

Section II: Specific requirements for certain products

Section III: Specific requirements for all services covered by the directive

Section IV: Specific requirements for certain services

Section V: Specific requirements for emergency services

Section VI: Links with other requirements arising from other Union acts

Section VII: Criteria regarding functional performance

### **Annex II – Non-binding examples of possible solutions contributing to meeting the requirements laid down in Annex I**

**Annex III – Requirements regarding the built environment where services are provided**

**Annex IV – Procedures for assessing product conformity**

Internal production control; Technical documentation; Manufacturing; CE marking and EU declaration of conformity; Authorized representative

**Annex V – Accessibility statement**

**Annex VI – Criteria for assessing whether compliance with accessibility requirements imposes a disproportionate burden**

### **3 GENERAL OBLIGATIONS OF PRODUCT MANUFACTURERS**

We will briefly review this chapter, insofar as the present note is mainly dedicated to e-commerce and the vast majority of those involved resell products manufactured by others. However, the subject cannot be overlooked because, on the one hand, resellers are distributors subject to specific obligations and, on the other hand, they may be assimilated to the manufacturer.

Articles 7 and following provide for general obligations applicable to manufacturers (art. 7), authorised representatives (art. 8), importers (art. 9), distributors (art. 10).

The manufacturer shall ensure the following:

- **Design and compliance:** verify that the product meets accessibility requirements.
- **CE marking and compliance:** establish a declaration of conformity and affix the CE marking.
- **Retention of documents:** keep the declaration of conformity and documentation for 5 years.
- **Ongoing compliance:** maintain compliance in light of product developments and standards.
- **Product identification:** indicate a batch or serial number for identification purposes.
- **Manufacturer information:** mention the name and a single contact address.
- **Clear user manual:** provide instructions and information in understandable language.

- **Management of anomalies:** correct issues and inform the authorities in case of non-compliance.
- **Cooperation with authorities:** provide documents and cooperate in case of official request.

The “distributor” is not forgotten. Article 3, 20, defines it as “any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a product available on the market,” while Article 3, 15, defines placing on the market as “any supply of a product intended to be distributed, consumed or used on the Union market in the course of a commercial activity, whether in return for payment or free of charge.”

The notion of distributor must therefore be properly understood: while common language often sees the distributor as an intermediary between the manufacturer and the retailer, the directive includes the retailer itself in this notion.

The retailer may therefore be, depending on the case:

- **Distributor** (purchasing and reselling);
- **Manufacturer** (when placing a product on the market under its own name or brand or modifying a product already placed on the market in such a way that compliance with the directive’s requirements may be compromised – art. 11);
- **Importer** (when selling a product imported from a non-EU country).

The distributor shall ensure the following (art. 10):

- **Diligence:** verify that the products meet accessibility requirements.
- **Pre-sale verification:** check for the presence of the CE marking, documentation, and instructions in a comprehensible language.
- **Management of non-compliant products before sale:** do not sell questionable products and notify the manufacturer/importer and authorities.
- **Storage and transport:** ensure that the product’s accessibility is not compromised.
- **Withdrawal of non-compliant products:** correct errors and inform the authorities if a product already sold is non-compliant.
- **Cooperation with authorities:** provide the required documents and implement the requested corrections.

## **4 GENERAL OBLIGATIONS OF SERVICE PROVIDERS**

### **4.1 Accessibility by design**

Service providers shall ensure that services are designed and provided in accordance with the applicable accessibility requirements.

Service providers are also required to ensure that procedures are in place so that the provision of services remains compliant with the applicable accessibility requirements for as long as the service is offered.

Any change in the characteristics of the provision of the service, in the applicable accessibility requirements, and in the harmonised standards or technical specifications with respect to which the service's conformity with accessibility requirements is declared, is duly taken into account by service providers.

It should therefore be noted that:

- Similar to the GDPR in terms of the protection of personal data (privacy by design), the directive establishes a principle of proper design, which involves modifying the roadmap so as to systematically integrate the verification of compliance with the criteria both at the design stage of the service and in its subsequent modifications. Ideally, just as some organisations have a DPO, there could be an accessibility officer.
- Documentation must be prepared explaining the measures implemented by the provider to fulfil its obligations.

### **4.2 Declaration obligation**

Service providers shall establish and explain how the services meet the applicable accessibility requirements.

The information is made available to the public in written and oral form, including in a way that is accessible to persons with disabilities. This translates in practice into an "accessibility statement", which may appear in the general layout, similar to what is done for the privacy policy or general terms and conditions.

Service providers shall retain this information for as long as the service is available.

Annex V of the directive details how to establish this statement and its content, which must at least include:

- A general description of the service "in accessible formats";



- The descriptions and explanations necessary to understand how the service operates;
- A description of how the accessibility requirements set out in Annex I are fulfilled by the service.

### **4.3 Management of non-compliance**

In case of non-compliance of the service, providers “take the necessary corrective measures” to (re)bring it into compliance with the applicable accessibility requirements.

### **4.4 Information of authorities and duty of cooperation**

At the reasoned request of a competent authority, service providers shall communicate all necessary information to demonstrate the compliance of the service with the applicable accessibility requirements. They shall cooperate with this authority, at its request, in any measure taken to bring the service into compliance with those requirements.

Furthermore, when the service does not comply with the requirements, service providers shall immediately inform the national competent authorities of the Member States in which they provide the service, providing details, in particular, on the non-compliance and any corrective measure taken.

## **5 WHAT IS AN “ACCESSIBLE” PRODUCT OR SERVICE?**

### **5.1 General logic**

Article 4 of the directive is a central provision that can only be understood in combination with the annexes. The logic is as follows:

- Only products and services that comply with accessibility criteria may be placed on the market.
- Products must comply with general requirements, and certain products must also comply with specific requirements.
- Services must be accessible, with reinforced obligations for certain services.
- Accessibility must include public or commercial buildings where these services are provided.

### Summary of Article 4 – Accessibility requirements

	Requirement	Details
Obligation to comply with accessibility	Only compliant products and services may be placed on the market or provided.	<ul style="list-style-type: none"> <li>- All economic operators (manufacturers, importers, distributors, service providers) must comply with the requirements of Annex I.</li> <li>- Harmonisation of rules within the EU to avoid national disparities</li> </ul>
Products	Compliance with general and specific accessibility requirements.	<ul style="list-style-type: none"> <li>- <b>Annex I, Section I: General requirements for all products</b> e.g. accessible keyboards, screens readable by a screen reader.</li> <li>- <b>Annex I, Section II: all products except self-service terminals</b></li> </ul>
Services	Ensure minimum and specific accessibility depending on the type of service.	<ul style="list-style-type: none"> <li>- <b>Annex I, Section III: General requirements for all services</b> e.g. understandable interface, compatibility with assistive technologies.</li> <li>- <b>Annex I, Section IV: Specific requirements for certain services</b> e.g. banking services, online commerce, telecommunications, transport.</li> <li>- <b>Exception:</b> urban, suburban and regional transport services are not covered.</li> </ul>
Built environment	Member States may impose standards for buildings open to the public	<ul style="list-style-type: none"> <li>- Requirements defined in Annex III.</li> <li>- Concerns commercial and public buildings: banks, stations, airports, offices, shops.</li> <li>- Allows physical accessibility in addition to digital accessibility.</li> </ul>

## 5.2 Focus on e-commerce

It emerges from the table above that e-commerce must comply with the requirements set out in Annex I, Sections III (general requirements) and IV (specific requirements for certain services).

Under the requirements for all services (Section III), it should be noted that:

1. Products used in the provision of the service must comply with the accessibility requirements set out in Sections I and II (depending on the product concerned). The objective is that the use of the service itself is not hindered by a product integrated into this service or necessary for its access or use that is not compliant. One may think, for example, of a check-in service in a station that uses an access terminal: there would be no point in requiring the interface to be accessible if the access terminal is not.
2. Services must provide information on how they operate and the possible link with products used within the service, it being understood that this information must be provided in specific ways:
  - **Multichannel:** accessible via different means (e.g. text, audio, braille);
  - **Understandable:** written in clear and simple language;
  - **Perceptible:** readable for people with visual impairments;
  - **Alternative formats:** compatible with other assistive media;
  - **Adapted font and contrast:** ensure easy reading with appropriate font and sufficient contrast;
  - **Alternative to non-text content:** provide a text description for images and diagrams;
  - **Accessible electronic information:** ensure consistency in the display and navigation of information.
3. **Websites**, including related online applications, and services integrated on mobile devices, including **mobile applications**, must be "accessible in a consistent and appropriate manner by making them perceivable, operable, understandable and robust." We will return to these four criteria in the chapter dedicated to the available standards.
4. If the service offers customer support or assistance services, these must provide information on the accessibility of the service, explain

compatibility with assistive technologies, and be available through accessible communication means.

Under the additional requirements for certain services (Section IV), it should be noted concerning e-commerce that:

1. The aim of the additional rules is to "ensure optimal and predictable use by persons with disabilities" of the services provided, which must therefore "include functions, practices, strategies and procedures as well as modifications to the operation of the service intended to meet the needs of persons with disabilities and ensure interoperability with assistive technologies."
2. Online merchants must provide information on the accessibility of products and services (when such information is available from suppliers) and ensure that the accessibility features of products are visible in the online descriptions. For example, a site selling computers must indicate whether the displayed model is compatible with assistive technologies, while a site selling audiovisual content must indicate whether that content is accessible.
3. E-commerce services must in particular ensure accessibility of the functionalities related to identification, electronic signatures, security, and payment, by making these steps perceivable, operable, understandable, and robust.

## 6 EXEMPTION AND EXCEPTIONS

### 6.1 General exemption

Recital 52 states that within the Union "la plupart des emplois sont fournis par les PME et les microentreprises" which have "une importance cruciale pour la croissance future," while recital 70 specifies that for these, the burden of complying with the accessibility requirements could be disproportionate. This diplomatic language should be understood as: most microenterprises will not be able to achieve compliance and, within the framework of balancing the Union's overriding interests, an exemption regime must be created in their favour.

A microenterprise is "une entreprise qui emploie moins de dix personnes et dont le chiffre d'affaires annuel n'excède pas 2 000 000 EUR ou dont le total du bilan annuel n'excède pas 2 000 000 EUR" (art. 3, 23).

Microenterprises that offer services are exempt from the requirements set out in Annex I, Section III (art. 4.5).

What, then, of the requirements in Annex I, Section IV (including, as seen, the specific attention paid to functionalities relating to identification, electronic signatures, security, and payment, which must be perceivable,

operable, understandable and robust)? It appears that the correct interpretation of the directive is not to exempt microenterprises in a general way, while still allowing them to benefit from the specific exemption analysed below.

Microenterprises and SMEs also benefit, here and there, from a relaxed regime, for example concerning the EU declaration of conformity of products.

## 6.2 Specific exemption: fundamental alteration and disproportionate burden

Article 14 of the directive is a source of controversy. Welcomed by the business world as a recognition of the significant burden that accessibility compliance can represent, it is seen by persons with disabilities and specialised associations as a potential source of abuse.

It provides that the requirements arising from Article 4 (and thus the related annexes) apply only insofar as compliance:

- a) Does not require a significant modification of a product or service resulting in a fundamental alteration of its nature; and
- b) Does not impose a disproportionate burden on the economic operators concerned.

Two different elements are targeted:

- The fundamental alteration of the nature of the product or service, induced by its significant modification to ensure compliance. This criterion concerns the product or service itself;
- The disproportionate burden this represents. This criterion concerns the economic consequences of the envisaged modification to ensure compliance.

Article 14 is oddly constructed linguistically. It begins by stating that the requirements “s’appliquent uniquement dans la mesure où” ... and then provides two elements connected by the conjunction “et.”

We therefore understand the matter in reverse: the fundamental alteration or the disproportionate burden may each be invoked by the concerned company to avoid compliance. In other words, the “et” is to be understood in practice as an “ou.” In the same sense, the European Commission's commentary states: “Les exigences spécifiques en matière d’accessibilité s’appliquent à tous les produits et services couverts par la législation, à condition qu’elles n’introduisent pas une modification fondamentale ou qu’elle n’impose pas une charge disproportionnée aux opérateurs.” (*emphasis added*)

Recital 64 explains this specific exemption through the principle of “proportionnalité.” It is recalled that in the UBO judgment of the Grand Chamber of the CJEU, the Court reiterated that proportionality requires a threefold test: (1) suitability, (2) necessity, and (3) proportionality of the interference in relation to the objective pursued. The three elements are close and related, but not identical:

- **Suitability** involves questioning whether the interference is capable of achieving the pursued objective;
- **“Strict necessity”** consists of asking whether “l’objectif ne pourrait raisonnablement être atteint de manière aussi efficace par d’autres moyens moins attentatoires à ces droits fondamentaux des personnes concernées”;
- **Proportionality in the strict sense** is a balancing act “qui implique notamment une pondération de l’importance de [l’objectif poursuivi] et de la gravité de ladite ingérence.”

The directive does not exclude the possibility of variable application, depending on the outcome of this proportionality analysis. Recital 66 states in this regard that “Dans des cas exceptionnels, lorsque le respect des exigences en matière d’accessibilité énoncées dans la présente directive ferait peser une charge disproportionnée sur les opérateurs économiques, ceux-ci ne devraient être tenus de s’y conformer que dans des proportions telles qu’elles ne leur imposent pas une charge disproportionnée.” It is therefore not excluded that the requirements will, in practice, become a sort of buffet from which the targeted companies will pick one or another measure based on the burden its implementation represents, or the modification it induces.

Annex VI establishes a methodology for conducting the proportionality analysis.

The directive provides that economic operators must provide evidence to support the evaluation and retain the results. In this regard, a relaxed regime is provided for microenterprises.

A re-evaluation must be carried out when the proposed service is modified, or at the request of the authorities responsible for monitoring service compliance, and in any event at least every five years.

The criterion relating to disproportionate burden may not be invoked when the company receives external funding for the purpose of improving accessibility.

## 7 PRACTICAL IMPLEMENTATION - THE IMPORTANCE OF STANDARDS

### 7.1 Role of standards and presumption of conformity

The concrete implementation of accessibility criteria is a complex task, despite Annex II which provides non-binding examples of possible solutions contributing to meeting the requirements set out in Annex I.

In practice, companies proceed via standards. Moreover, a presumption of conformity is created for products and services that comply “aux normes harmonisées ou à des parties de normes harmonisées dont les références ont été publiées au Journal officiel de l’Union européenne” insofar as those standards or parts of standards cover those requirements (art. 15).

The European Commission is expressly tasked with encouraging the adoption of harmonised standards and is granted in the directive the possibility of adopting implementing acts to this end.

Regarding standards, WCAG, RGAA and ISO cannot be overlooked.

### 7.2 WCAG

WCAG are guidelines created by the W3C (World Wide Web Consortium) through its WAI (Web Accessibility Initiative). They define standards intended to make web content accessible to people with visual, auditory, motor, and cognitive impairments.

The current version is WCAG 2.2 (2023). Three levels of compliance are provided: A (Minimum accessibility), AA (intermediate level, which has become the standard for public sites), and AAA (Advanced accessibility).

The four fundamental principles of WCAG aim to make the site:

- **Perceptible:** content must be visible and understandable, e.g. subtitles for videos, text descriptions of images.
- **Operable:** navigation must be simple and functional (e.g. keyboard navigation, compatibility with screen readers).
- **Understandable:** texts and interactions must be clear (e.g. explicit instructions, easily understandable errors).
- **Robust:** the site must be compatible with assistive technologies (e.g. screen reading software).

Through these four fundamental principles, the connection with the directive is direct (see in particular the developments devoted to Annex I, Section IV).

### 7.3 RGAA

The RGAA (Référentiel Général d'Amélioration de l'Accessibilité) is a transposition of the WCAG adapted to the French regulatory context. The standard currently in force, RGAA 4, is derived from WCAG 2.1 level AA. This means that the 4 fundamental principles listed above are integrated into RGAA.

RGAA is generally considered more concrete than WCAG: tests exist for each accessibility criterion with a detailed audit methodology. A French government website documents 106 control criteria and prescribes the associated tests and methodology for their implementation.

The RGAA received official status through the 2005 law on equality and the 2019 decree: it is mandatory for public websites (administrations, local authorities, public services).

WCAG has the advantage of being highly international, whereas RGAA is more specifically French and, in its implementation, is seen as more concrete and offering sources and manuals available in the French language.

As a French standard, it is not published in the Official Journal of the Union and therefore does not benefit from the presumption of Article 15. Nevertheless, it is indirectly recognised via the principle set out in Article 6 of the directive according to which "Les États membres ne font pas obstacle, pour des raisons liées aux exigences en matière d'accessibilité, à la mise à disposition sur le marché, sur leur territoire, des produits ou à la fourniture, sur leur territoire, des services qui sont conformes à la présente directive." If a product or service complies with the French standard, and receives CE marking as a result, it becomes extremely difficult to hinder its free movement within the EU.

### 7.4 ISO

Several standards exist, whose usefulness depends on the objective pursued. In summary, the following should be noted:

- **ISO/IEC 40500:2012**, dedicated to websites, which reproduces the content of WCAG 2.0. The standard is recognised but suffers from not having benefited from the improvements of versions 2.1 and 2.2 of WCAG (addition of requirements for cognitive and mobile disabilities), as well as the notable lack of consideration for the specificities of mobile applications.
- **ISO 30071-1:2019**, dedicated to the ICT sector, which is inspired by WCAG but does not reproduce it in full as it goes beyond websites to cover the entire information and communication technology sector (software, hardware, telecommunications, etc.).





- **ISO 9241-171**, dedicated to software accessibility (user interfaces and interactive functionalities), and offers a very ergonomic approach (e.g. keyboard navigation, voice feedback, adapted contrasts, etc.).