



The voice of blind and partially sighted people in Europe

European Commission survey: Targeted consultation on the availability of works other than printed works in formats accessible for persons with disabilities within the internal market

EBU response | April 2021

Preliminary remarks

The purpose of this targeted consultation is to collect information and data on the availability of certain copyright protected works, in particular works other than printed works (e.g. films, photos or music), to persons with disabilities. The Commission is carrying out this exercise as part of the preparation for a report foreseen by Article 9 of the 'Marrakesh' Directive (EU) 2017/1564. The consultation is targeted at persons with disabilities and organisations acting on their behalf, right-holders, content producers, distributors, service providers, broadcasters and educational institutions.

Scope of the consultation

This consultation focuses on the availability of accessible format copies of:

- works other than printed works for persons with print disabilities, e.g. content such as films, photos or music
- all types of works (printed works and other content such as films, photos or music) for persons with disabilities other than print disabilities, e.g. hearing, physical and cognitive disabilities

For the purposes of this consultation,

- “Printed works” are books, newspapers, magazines, sheet music, and related illustrations and any other kind of written works. These works are covered by the Marrakesh Directive regardless of the media in which they are made available: digital or analogue, online and offline. Therefore, ebooks and audio forms are also included in this definition.
- “Print disabilities” refer to visual, perceptual, reading and physical impairments, which make it impossible or very difficult for a person to read printed works, compared to a person without such impairment. Such disabilities include visual impairments (including blindness and low vision), cognitive disabilities (including dyslexia) and other disabilities leading to functional limitations, such as making it impossible to hold or manipulate a book.
- “Accessible formats” refer to ways of presenting printed, visual or any other material that persons with disabilities can access (e.g. Braille in the case of blind persons, closed captioning in the case of hearing impairment or cognitive disabilities). Accessible formats can be “born accessible” or “accessible format copies”.
- “Born accessible” means that an original work has been created in a way to allow persons with disabilities to access it.
- “Accessible format copy” means a copy of an original work, including works other than printed works, in an alternative manner that gives persons with disabilities access to that work as feasibly and comfortably as a person without impairment or disability.

Part 1: General information concerning EBU

See end of this document, “About EBU”.

Part 2: What types of works and accessible formats are made available to persons with disabilities and how? Are there needs of persons with disabilities to access works, not currently addressed?

The objective of Part 2 is to understand what material is currently made available for persons with disabilities to facilitate their access to copyright protected works and under what conditions. The objective is also to understand whether persons with disabilities

would require additional material, not currently made available, to be able to access copyright protected works.

Please select the type(s) of copyright protected content that your contribution will refer to:

EBU selection:

- Audiobooks (for persons with disabilities other than print disabilities, which are already covered by the Marrakesh Directive)
- Printed works, including ebooks, (for persons with disabilities other than print disabilities)
- Records and other sound recordings (phonograms)
- Audiovisual works and motion pictures (e.g. films, TV series, television programmes)
- Images (pictorial and graphical works, photographs)
- Sculptural and architectural works
- Videogames
- Software

Section 1 – Accessible formats currently available within the EU

1. According to your experience or to your knowledge, are the categories of works that you selected currently available to persons with disabilities in accessible formats?

Select from options: Yes; No; Yes, but with limitations; I don't know / no opinion

- Audiobooks (for persons with disabilities other than print disabilities) - I don't know / no opinion
- Printed works, including ebooks (for persons with disabilities other than print disabilities) - I don't know / no opinion
- Records and other sound recordings (phonograms) - I don't know / no opinion
- Audiovisual works and motion pictures (e.g. films, TV series, television programmes) - Yes, but with limitations
- Images (pictorial and graphical works, photographs) - I don't know / no opinion
- Sculptural and architectural works - Yes, but with limitations
- Videogames - Yes, but with limitations

- Software - Yes, but with limitations

Open answer:

We refer here to the comments made by EDF, our umbrella group, and DBSV, our German member - which we echo here.

Re. images (and possibly sculptural and architectural) works, comment from our French member CFPsAA: There are many print reproductions of paintings in art books, museum catalogues etc. and 3D printing opens a vast area of new possibilities. Yet accessible format reproductions for visually impaired persons remains a problem, allegedly for reasons of author rights. So, while the Marrakesh Treaty covers print works, it remains a grey area in its application whether authorised entities are allowed to produce, distribute or expose pictorial works in accessible formats. For a good socio-cultural inclusion of visually impaired persons, it is essential that they are able to comprehend, even distantly, the codes carried by art works.

Re. limitations, our UK member RNIB indicates: for audiovisual works and motion pictures, limitations such as timings and means by which the material is accessed; for images and sculptural and architectural works, limitations such as various exhibitions in certain locations and at certain times too. General comment: provision is by no means consistent nor comprehensive. Printed materials are not always made available in other reading formats such as braille, large print or digital. While most films released now do have audio description these are not always available at each showing i.e. a person needs to check that the film has AD before they attend. The same would be true for other performances and a number of museum and art exhibitions too.

2. According to your experience or to your knowledge, please specify in what accessible formats are these works available to persons with disabilities:

Select from options:

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information)
- Audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance)

- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software)
 - Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them)
 - Voice navigation techniques
 - Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives)
 - Other
-
- Audiobooks (for persons with disabilities other than print disabilities) – left blank
 - Printed works, including ebooks (for persons with disabilities other than print disabilities) - left blank
 - Records and other sound recordings (phonograms) - Audio description; Voice navigation techniques
 - Audiovisual works and motion pictures (e.g. films, TV series, television programmes) - Subtitling / closed captioning; Audio description; Other
 - Images (pictorial and graphical works, photographs) – Audio description; Image and photo descriptions; Tactile paintings, pictures, maps; Other
 - Sculptural and architectural works – Audio description; Tactile paintings, pictures, maps
 - Videogames - Audio description; Voice navigation techniques
 - Software – Voice navigation techniques

Please specify the other accessible formats: see the responses from our umbrella group the European Disability Forum (EDF) and our German member DBSV.

3. According to your experience or to your knowledge, how easy or difficult is it to obtain works in the accessible formats that you selected for persons with disabilities?

Select from options: Very easy to obtain; Easy to obtain; Difficult to obtain; Very difficult to obtain; I don't know / no opinion; N/A (not applicable)

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and

description of background noises, speaker differentiation, phones ringing and other relevant information) - I don't know / no opinion

- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - Very difficult to obtain
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - I don't know / no opinion
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) - I don't know / no opinion
- Voice navigation techniques - Difficult to obtain
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - I don't know / no opinion
- Other – left blank

Open answer:

Where we reply "I don't know/no opinion", it is due to divergent feedback from our national member organisations.

We support the comments made here by EDF and DBSV.

Regarding audio description and audio subtitling, we refer to our position paper on EU (Creative Europe/MEDIA) funding to the film industry – attached.

Comments from our UK member RNIB: information in other formats is still inconsistent and too often relies on the service user to make this request rather than being offered. The levels of audio description on video on demand are still too low and there is no expectation of this changing for some years too. On subtitling / closed captioning: very well provisioned on actual Television services. However, much more inconsistent when seeking to watch via an on demand service; on image and photo descriptions and tactile paintings, pictures, maps: there are a number of software providers which would enable a person with sight loss to access these. Importantly some of these are free to access. However, sometimes the complex nature of the image is not able to be described by the text to speech software; on voice navigation techniques: very easy to access assuming the user has a smartphone and the ability to access this and the relevant apps.

4. According to your experience or to your knowledge, what has been the impact of the COVID-19 pandemic on the availability of the accessible formats that you selected?

Select from: It has a positive impact; It has no impact; It has a negative impact; Other; I don't know / no opinion; N/A (not applicable)

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) - I don't know / no opinion
- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - I don't know / no opinion
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - I don't know / no opinion
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) - I don't know / no opinion
- Voice navigation techniques - I don't know / no opinion
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - I don't know / no opinion
- Other - I don't know / no opinion

Open answer:

We support the comments made here by EDF and DBSV.

Our French member CFPSSAA also comments: A wider distribution of audio-described works is necessary; it is currently very limited and only in some portions of the territory. The current sanitary context does not facilitate things, for financial reasons, but also because access to cultural places that provide audio description is impossible or limited.

And our UK member RNIB: the Coronavirus pandemic of the past year has highlighted a number of key areas with regard to the accessing of information. Initially we were concerned that information about the virus and government advice wasn't available in other reading formats. This concern then moved onto the testing process i.e. how accessible is the test, will information about using it

be in other reading formats. Then these concerns moved onto the vaccination process and the many access concerns here. Another key area has been the huge demand for audiobooks which RNIB does provide via our Bookshare service. However, other providers will also have experienced higher demand and being commercial they will charge and these books will carry VAT charges too which is not the case for E books.

5. Are those accessible formats that you selected commercially available (and being born accessible) for disabled persons or are they provided to them by organisations acting on behalf of persons with disabilities (accessible format copies)?

Select from: Born accessible; Accessible format copies; Both; None; I don't know/no opinion; N/A (not applicable)

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) - I don't know/no opinion
- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - Both
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) – Both
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) – Accessible format copies
- Voice navigation techniques – Both
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - Both
- Other - I don't know/no opinion

Open answer:

Our replies are for the EU considered as a whole, based on sometimes divergent replies from our members; so for instance, when we reply “both”, it does not exclude that only one accessible format or even none is available in a given country.

We fully support the EDF comment: "Accessible content remains a scarcity. So the above answers should not be interpreted as being widely available but rather when they are seldom available they can be either 'born accessible' or in 'accessible format copies'. Ideally content should be 'born accessible' and there should be legal requirements to do so. Where this is not done and accessible copies are required, both right of doing so and sufficient public funding should be provided so that originally inaccessible content can be made accessible."

And we add: it is always so much better when provision is via born accessibility as trying to retro fit accessibility is going to be more expensive and doesn't always meet the full needs of the user nor the expectations of the provider. Information needs to be made available at the same time as print materials and in a variety of formats such as large print, Braille etc.

6. From the available accessible formats that you selected, what is the proportion between "born accessible" and "accessible format copies"?

Select from: Mostly "born accessible"; Mostly "accessible format copy"; More or less the same proportion; I don't know/no opinion; N/A (not applicable)

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) – N/A
- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - Mostly accessible format copy
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - More or less the same proportion
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) – N/A
- Voice navigation techniques - More or less the same proportion
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - More or less the same proportion

- Other - I don't know/no opinion

Open answer:

Where we respond "same proportion", it is because we get conflicting indications from our national member organisations. Comment from our UK member RNIB: the provision of audio description for video on demand is likely to remain behind that of television programming and movies for some years which is frustrating and leads us to ask how much longer should we be expected to wait?

7. According to your experience or to your knowledge, are works in the accessible formats that you selected provided to end users at a different price than an original work?

Select from options:

- No, they are provided for free
 - No, they are provided at no additional price (no difference in cost for the creation of original works and for those that are "born accessible"/ "accessible format copies")
 - Yes, they are provided at an additional price, to incorporate the costs incurred during the production of the accessible format
 - Yes, they are provided at an additional price, going beyond the costs incurred during the production of the accessible format
 - Yes, they are provided at a reduced price
 - I don't know/ no opinion
 - N/A (not applicable)
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- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) - No, they are provided for free
 - (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - I don't know/ no opinion
 - Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - I don't know/ no opinion

- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) - I don't know/ no opinion
- Voice navigation techniques - No, they are provided at no additional price
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - I don't know/ no opinion
- Other – N/A

Open answer:

When we respond "I don't know/no opinion", it is because we get conflicting indications from our national member organisations, mostly between "free" and "no additional price".

We fully support the following EDF comment: "We are not aware of cases when accessible formats of content, whether born accessible or accessible copies, are made available to persons with disabilities at additional cost because of accessibility. However, it needs to be considered that when organisations of persons with disabilities make accessible copies of inaccessible originals there are cost implications for them. As these are not-for-profit organisations, these costs can be substantial for DPOs, therefore sufficient funding should be allocated to them by States to provide accessibility of content. Ideally, of course there should be legal requirements for content to be born accessible with no additional accessibility-related cost implications for end-users."

We add: the issue of concern is more around these other formats being made available at the same time and awareness of them being shared too.

Comment from our UK member RNIB, on tactile paintings, pictures, maps: RNIB provides some of these and when we do it is always free. As far as we are aware when similar are provided by galleries and museums there is no additional cost too.

Section 2 – Availability of accessible formats within the EU - Subsection 1: Questions on “born accessible” content

1. What proportion of the works that you produce are born accessible?

Select from: Not applicable (no production of this work); 0%; 10%; 20%; 30%; 40%; 50%; 60%; 70%; 80%; 90%; 100%; I don't know / no opinion

- Audiobooks (for persons with disabilities other than print disabilities) - Not applicable (no production of this work)
- Printed works, including ebooks, (for persons with disabilities other than print disabilities) - Not applicable (no production of this work)
- Records and other sound recordings (phonograms) - I don't know / no opinion
- Audiovisual works and motion pictures (e.g. films, TV series, television programmes) - I don't know / no opinion
- Images (pictorial and graphical works, photographs) - I don't know / no opinion
- Sculptural and architectural works - Not applicable (no production of this work)
- Videogames - Not applicable (no production of this work)
- Software - Not applicable (no production of this work)
- Other (please specify) - Not applicable (no production of this work)

2. Do you incur additional costs for the production of those born accessible works?

Reply: I don't know / no opinion

3. According to your experience or to your knowledge, do the born accessible works that you produce circulate to other Member States?

Reply: Yes.

Open answer:

It should be noted that the content we produce and publish as a DPO is not subject to copyright and is often intended for the purpose of free dissemination.

RNIB replied "No", and in response to previous question indicated: I don't believe our provision of materials in other formats or the addition of AD on videos adds to costs which haven't already been placed in budget. In reply to the question below, RNIB added: RNIB Comment: inevitably the need to produce materials in other formats and to be made fully accessible i.e. with the addition of AD does add to costs. However, these are less than attempting to amend documents which were initially produced in a non-accessible format.

4. According to your experience or to your knowledge, is the production of born accessible works more or less costly than the production of accessible format copies?

Producing born accessible works is more expensive.

5. According to your experience or to your knowledge, what has been the impact of the COVID-19 pandemic on the production of born accessible works?

Reply: It has a negative impact.

Open answer:

In reality we don't know. However, we suspect the urgency of government and others to share messages has meant more pace and less consideration of the access needs of disabled people in general and people with sight loss in particular. We are concerned too about the longer term consequences of the resulting economic crisis on funding available for making works accessible.

Subsection 2: Questions on "accessible format copies"

6. According to your experience or to your knowledge, who makes the "accessible format copies" that you selected?

Select from: Users; Organisations representing disabled persons; Producers of accessible format copies; Subcontractors of producers; Other (please specify); I don't know / no opinion

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) - Producers of "accessible format copies"; Subcontractors of producers
- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - Organisations representing disabled persons; Producers of "accessible format copies"; Subcontractors of producers
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - Organisations representing disabled persons;

- Producers of “accessible format copies”; Subcontractors of producers; Other
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) - Organisations representing disabled persons; Producers of “accessible format copies”; Other
 - Voice navigation techniques - Other
 - Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - Organisations representing disabled persons; Producers of “accessible format copies”; Other
 - Other – I don’t know / no opinion

Please specify the other persons or organisations that makes the "accessible format copies" available that you selected:

cultural entities, museums and other provider of the exhibits; schools; specialised entities/producers, IT companies; others with expertise such as freelance disability awareness and accessibility experts.

7. Do you produce “accessible format copies” of works other than printed works?

Reply: No.

Open answer:

But some of our national members do - see in particular DBSV and ONCE responses.

Our UK member RNIB indicates: We provide a talking book service via audio CDs and sticks. We also provide a Bookshare service which is aimed mostly at children and young people with the intention of making text books accessible via digital medium. We also provide all our videos with AD.

8. What is your preferred practice in order to provide access to copyright protected works for disabled persons?

Select from: producing “accessible format copies; acquiring already commercially available accessible formats

Reply: acquiring already commercially available accessible formats

9. According to your experience or to your knowledge, what percentage of the original works are subsequently made accessible to disabled persons through “accessible format copies”?

Reply: 10%

10. According to your experience or to your knowledge, what is the cost of making an accessible format copy of a work?

Select from: The cost is high; The cost is reasonable; There is no additional cost (no difference in cost for the creation of original works and for those that are “accessible format copies”); I don't know / no opinion

- Subtitling / closed captioning (i.e. text versions of the spoken part of a television, movie, or computer presentation; and description of background noises, speaker differentiation, phones ringing and other relevant information) - I don't know/no opinion
- (Movie) audio description (i.e. voice description to provide information surrounding key visual elements in a media works, e.g. film, television programme, theatrical performance) - I don't know/no opinion
- Image and photo descriptions (i.e. descriptions for visually impaired people providing information on e.g. pictures, diagrams, maps, charts, icons – including for the use of software) - I don't know/no opinion
- Tactile paintings, pictures, maps (i.e. tactile formats use raised surfaces so that visually impaired persons can have a perception of them) - I don't know/no opinion
- Voice navigation techniques - I don't know/no opinion
- Easy-to-read text (for persons with disabilities not covered by the Marrakesh Directives) - I don't know/no opinion
- Other - I don't know/no opinion

Open answer:

We have systematically replied "I don't know/no opinion" due to conflicting feedback from our members, within each category. We support the EDF statement: "In the absence of systematic data this is difficult to assess. In general, accessibility by default is less costly than providing it retrospectively. When organisations or other

entities do provide accessible copies, sufficient funding should be allocated to them to do this".

11. According to your experience or to your knowledge, who finances the production of “accessible format copies”?

Select from: Users; Organisations representing disabled persons; Producers of “accessible format copies”; National authorities; Other (please specify); I don't know/ no opinion

Reply: Organisations representing disabled persons; National authorities

12. According to your experience or to your knowledge, do “accessible format copies” of works that you have access to/provide access to in your country of residence originate from another Member State?

Reply: I don't know / no opinion

13. Do you exchange “accessible format copies” of works with persons with disabilities or organisations acting on their behalf in other Member States?

Reply: Yes

Open answer:

We exchange print and non-print works which we produce, but these are not subject to copyright, as most are policy, awareness-raising and capacity building material made publicly and freely available.

14. According to your experience or to your knowledge, what has been the impact of the COVID-19 pandemic on the production and availability of “accessible format copies”?

Select from: It has a positive impact; It has a negative impact; It has no impact; I don't know / no opinion; Other

Reply: It has a negative impact

Open answer:

While the pandemic has pushed for wider use of IT-based works, and consequently promoted good practices, it is also true that it has affected funding sources.

RNIB comment: The Covid pandemic has shown very clearly the importance of providing information in other reading formats. Information about the virus, the testing and the vaccination process was all slow to be available in other formats. RNIB provided a lot of information about the impact of social distancing to both improve awareness of blind and partially sighted people and also sighted people too. We experienced huge demand on our audio book services too again showing how important it is for people to be able to access materials in a format which they are able to fully utilise.

Section 3 – Accessible formats needed and not currently available within the EU

- 1. According to your experience or to your knowledge, is there a need to have accessible additional formats available for persons with disabilities, that are currently not available?**

Reply: Yes

Open answer:

We support the EDF comment: "There is especially need for accessible audiovisual content, including creative, educational and informative content. This is not sufficiently solved by the EU AVMSD, as it only included traditional broadcast and video on-demand services. The Directive is also quite vague on requirements with no quantitative and qualitative obligations for accessible content. There is also need educational material other than print works, and/or other than for persons with print disabilities." We add: there is certainly a need for current provision to be more consistent and comprehensive.

- 2. Which types of accessible formats do/would persons with disabilities need in addition to those that are already available?**

All types selected, including Other.

Please specify 'other':

Formats to make e-books accessible (e.g. ePub3); formats to make software compatible with magnification software and Braille displays.

Open answer:

We support the EDF comment: "Even when available, accessibility content is still very rare. There are differences depending on where you live in the EU, but all in all accessibility is still seen as an add-on and somewhat a luxury rather than something required by default. Besides the issue of scarcity, there are also quality issues. Therefore, requirements for meeting quality standards should be ensured."

We add: accessible materials need to be much more widely available. They also need to be available at the same time as the printed version. There is still a much greater need for AD in all settings and particular concern with regard to the increased use of video on demand which has even lower levels of AD provision.

3. Are there any obstacles that make it difficult for you to have access to accessible formats?

Reply: Yes

Open answer:

We support the EDF comment: "Often the apps and websites to access content aren't accessible themselves. Same is often true for hardware. Even though the European Accessibility Act will solve many of these issues, digital platforms and services still would be free to remain inaccessible, as new proposals for regulating digital platforms and services fail to require accessibility of these services." We add: information is increasingly being made available in a digital format for example via websites and apps. However, it is not always the case that these websites are fully accessible which means at best only some of the info and sometimes none is available for people with sight loss.

4. What are the main obstacles that make it difficult for you to have access to accessible formats?

Select from: Cost; Availability in Member State; Lack of information; Lack of responsiveness by producers; Other (please specify); Not applicable; I don't know / no opinion

Selected: Cost; Availability in Member State; Lack of information; Lack of responsiveness by producers

5. Are there any obstacles that make it difficult for you to provide access to accessible formats?

Reply: Yes

6. What are the main obstacles that make it difficult for you to provide access to accessible formats?

Select from: Costs of making accessible format copies; Costs or difficulties related to the clearance of rights; Lack of demand; Lack of information; Lack of appropriate distribution channels; Lack of funding or government incentives; Copyright-related issues; Language issues; Interoperability issues; Absent or ambiguous legal framework (e.g. unclear legislation on exceptions and limitations to copyright, no contractual agreements between right-holders and/or collective management organisations and organisations acting on behalf of persons with disabilities, etc.); Other (please specify); I don't know/ no opinion

Selected: Costs of making accessible format copies; Costs or difficulties related to the clearance of rights; Lack of funding or government incentives; Copyright-related issues; Interoperability issues; Absent or ambiguous legal framework

7. Are you planning to invest in developing additional or/and better accessible formats?

Reply: I don't know/ no opinion

Part 3: Possibility to provide final comments and to upload a document

Please provide any other information that you find useful regarding the availability of works in accessible formats for persons with disabilities.

EBU is currently engaged in a campaign to push for use of EU funding to the film industry, through the Creative Europe programme, that supports and promotes audio description and audio subtitling. See [position paper](#) attached. In that context, we are currently looking into the practices of the film industry at national

level, not only due to considerations of EU subsidiarity, but also to prepare possible future action at national level too.

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 25 European Union member states, candidate countries and other countries in geographical Europe.

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