European Blind Union

11th General Assembly, Rome, Italy, 28/30 October 2019

Report by the Board for the four years ended October, 2019

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# Introduction

The European Blind Union is a non-governmental organisation protecting and promoting the rights and interests of blind and partially sighted people in Europe. The large number of member organisations we reunite provide us with a great deal of knowledge, expertise and experience related to visual impairment and its implications in the daily life of millions of persons with sight loss. Together with 5 further regional unions the European Blind Union is united in the World Blind Union and thus participates on global level in promoting the interests of blind and partially sighted people.

This quadrennial report gives an overview on the activities of the constitutional bodies and further elements of the European Blind Union. It aims to give an impression of the variety of work areas, the intensive mutual collaboration between EBU and its national members, and shows the results achieved through this work. In general, it covers the work period between the 10th and the 11th General Assembly of EBU. In some cases it has been appropriate, in aid of comprehension, to mention incidents beyond this time.

Membership of the European Blind Union is globally stable. EBU currently has 41 members. Proudly we can state that, from the very beginning, EBU has defined its structure and strategies as a community of national members that represent blind and partially sighted people from all over Europe, regardless of the cultural, social or political structure of their country.

# Constitutional bodies

## General Assembly

The General Assembly of Members, held every four years, is our governing body.

In meeting the requirements of the EBU constitution, the General Assembly, held in October 2015 in London, agreed on the following topics and sent the respective resolutions to the newly elected Board for consideration during its work period:

Transparent funding

Joint annual member activity with International Council for Education of People with Visual Impairment (ICEVI Europe)

On Refugees

On gender equality

Updating terminology

## Board

**Composition**

The 10th General Assembly elected the following candidates to the board (note! With the exception of the position of the president and the vice-president, for the particular position there was just one candidate.):

**Officers**

President: Wolfgang Angermann, Germany

First Vice-President: Alexander Neumyvakin

Second Vice President: Bárbara Martín Muñoz, Spain

Secretary General: Maria Kyriacou, Cyprus

Treasurer: Philippe Chazal, France

**Ordinary Board Members**

Ana Sofia Antunes, Portugal

Mario Barbuto, Italy

Emin Demirci, Turkey

Bozidar Denda, Montenegro

Ann Jönsson, Sweden

Vaclav Polasek, Czech Republic

Sinan Tafaj, Albania

Emin Demirci, Ana Sofia Antunes and Alexander Neumyvakin were declared as representatives for the World Blind Union’s Executive Committee.

After the 10th EBU General Assembly Bozidar Denda resigned from his office for lack of national financial support by his national organisation after election of another person as president; in line with the EBU constitution, he was not replaced. After Ana Sofia Antunes was appointed governmental officer for people with disabilities in Portugal, she set her EBU board position to abeyance with respect to internal Portuguese guide lines.

Out of the composition of the Board Members, the Finance and Fundraising Committee, and the Constitution Committee were re-established. Also, the General Assembly Organising Committee restarted its work. Finally, a special working group on strategy planning was established out of the Board. The work of these committees serves as an important source for the respective discussions and decisions in Board meetings.

**Meetings**

During the work period, the Board held meetings, as follows:

* 2015: London, United Kingdom, 28 October
* 2016: Madrid, Spain, 16-17 January; Berlin, Germany, 18-19 June; and Paris, France, 29-30 October
* 2017: Rome, Italy, 03-05 February; Malmö, Sweden, 09-11 June; and Larnaca, Cyprus, 21-22October
* 2018: Prague, Czech Republic, 02-03 February; Lisbon, Portugal, 22-23 June; and Barcelona, Spain, 19-20 October

2019: Tirana, Albania, 03-04 February; Moscow, Russia, 24-25 May; and Rome, Italy, 27 October

In addition the officers of the Board held weekly meetings over Skype to address issues requiring urgent action. The officers’ decisions were reported to and confirmed by the Board at their face-to-face meetings.

It was one of the major tasks at the start of the period of this report to implement the new, project-based working structure of EBU, as already postulated by the 9th and adopted by the 10th General Assembly in October 2015. So the priority areas, as defined in the strategic plan 2015 – 2019 were set up, the respective projects were allocated, the national members and experts in charge were identified, and all areas and projects were given a board link to secure the necessary system of feedback and guidance.

With regards to our campaigns, most of which aim at binding EU regulations for the benefit of blind and partially sighted people, we had lost an essential part of our resources to do the work needed. In order to compensate for this loss, the EBU board took measures to encourage our national members from EU countries to offer additional involvement and assistance. Today we can state that our encouragement was successful (see the treasurer's report).

## EBU General Office

The EBU Central Office supports the Board, national members, Commissions and Networks in their work. It is also the main contact point for information to the general public, members and partner organisations. Ever since it was established, the Central Office has been located in central Paris.

Headed by the Executive Director, EBU’s central office team is composed of four other staff members. At the end of this work period the permanent EBU staff members were:

Executive Director: Mokrane Boussaïd

Project Officer: Romain Ferretti

Head of Campaigning: Antoine Fobe

Information Officer: Gary May

Office Assistant: Valérie Vivancos

## Networks and Commissions

Beside the project-orientated structure of EBU, some commissions and networks were maintained. These were the Commission for Liaising with the European Union and the Development Commission.

EBU’s activities are also facilitated through Networks, established to address various work areas, including ICTs, Road safety and access to transport, rights…, as well as the needs of specific segments of the visually impaired population, including persons with low vision, women etc...

EBU campaigns were reported on and discussed during the yearly meeting of the EBU commission for Liaising with the EU held in:

* Paris (France) on 24-25 September 2016, the meeting was attended by delegates from 23 countries;
* Tallinn (Estonia) on 16-17 September 2017, the meeting was attended by delegates from 22 countries
* Obzor (Bulgaria) on 28-29 September 2018, the meeting was attended by delegates from 20 countries
* Tirrenia, Italy, on 21-22 September 2019, the meeting was attended by delegates from 20 countries.

# EBU and its Members Internal Communication

EBU is mindful of the need to establish good communication between its constituent bodies.

This is essential if we want to ensure optimal participation, avoid duplication and create synergies.

As a European network, EBU wants to improve internal communication with its members through transparent and harmonised use of EBU technical terminology. To this end, a “Glossary of terms and acronyms in common use by the European Blind Union” was developed with a view to ensuring that EBU members, staff and close associates understand the same thing when specific terms are used. As a complement, 35 participants from 8 countries attended a “Getting to know EBU” e-workshop on 5 July 2018. They were shown how the European Blind Union and its office work, the constraints and limitations faced and current campaigns and projects.

In general, we are using the following tools to support our internal communication.

### Discussion lists

In order to facilitate and boost in depth exchange of information, experience and good practices amongst members between meetings, we have developed e-mail “discussion lists” according to areas of interest.

### Flash news

The Flash News, a tool designed for internal communication purposes, is aiming at rapidly informing all our members about important news and ongoing activities. This tool allows for regular communication on our day-to-day activities in a quick and convenient way. During this work period, 26 flash news were produced and released.

### Newsletters

The EBU monthly and quarterly Newsletters – see below, about external communication – are in fact also, possibly essentially, an element of the EBU communication toward its member organisations.

# EBU’s External Communication

It is equally important to maintain and increase our visibility and to make the needs and aspirations of blind and partially sighted people known to decision makers, partner organisations, industry and the general public. Communication tools we use to that effect include:

## Website

The New EBU Website: EBU has had a website since the end of the 1990s, this first version, though it did the job for many years, meanwhile looked extremely old-fashioned. In 2010 EBU decided to completely modernise the website in terms of both content and design, leading to the recent version, which looked much more up to date, even today. However, the internet (and new technology in general), evolves very quickly, and today more and more people use mobile devices (tablets and phones) to consult internet. The previous EBU site could not be displayed and consulted correctly on such devices.

Therefore it was decided to completely redesign the site, and to take the opportunity to orientate it towards the main body of work in EBU, campaigning for the rights of blind and partially sighted citizens throughout Europe, which is a quite different approach to the previous organisation by 'working areas'.

Following a Europe-wide call for tender, a Spanish company specialising in accessibility issues, was chosen to create and host the new site. The process took several months and involved input from a wide range of people within the EBU network. The new site was launched in December 2017.

## The EBU Newsletter

Our Newsletter is one of our most important tools to share information. Its content covers relevant news items from all EBU members and key lobbying projects and campaigns. with the financial support of the EC.

In 2018 the EBU newsletters were completely reconsidered, in order to better reflect the needs of its members, with a monthly members-only newsletter in English, and a three-monthly newsletter named EBU Focus, in 7 languages (English, French, German, Polish, Serbian, Spanish and Turkish) and aimed at a much wider audience. Each Focus newsletter is an in-depth examination of an issue of importance for the blind and partially sighted community.

## Position papers and press releases

EBU published over 20 position papers, whether on own-initiative or in reply to consultations (public or limited) on a wide variety of topics. This of course primarily included our areas of campaigning, but also touched upon other areas of concern. See the Campaigns chapter for further details

EBU also issued 25 press releases in the period considered by this report, typically to communicate more widely on its position papers or on key legislative developments, sometimes also to build pressure on institutional stakeholders blocking progress.

## Twitter

Illustrating the importance taken by this social network in campaigning, the management and running of the EBU Twitter account was entrusted to the new Head of Campaigning. The twittering is a combination of reaching out to decision makers and the press on our EU policy and legislation related concerns, and connecting with as wide a public as possible of stakeholders, to hear their views and inform them of our activities.

We successfully experimented an EBU-coordinated sensitisation campaign in November and December 2018 with a set of 10 “digital accessibility tips” prepared by the French Federation of the Blind and Partially Sighted and translated by most of our other members present on Twitter.

The EBU Twitter account has consistently and steadily increased its number of followers and impact, as attested by the monthly analytic report produced by the Head of Campaigning.

## The EBU Access Cast

A new and innovative communication activity was launched by EBU in 2018; a podcast by and for blind and partially sighted people focusing on new technological developments. As with any entirely new media project, adaptations had to be made as the podcast evolved, nevertheless 6 podcasts were produced in 2018 and further 7 podcast in 2019 until the end of this working period. These looked at both niche and mainstream products of particular interest to BPS users but also on EU legal developments (web accessibility directive, European Accessibility Act, revision of EU Standards for public procurement of ICT products and services are available). With an average number of 75 listeners per episode, the podcast, recently quoted in a CNN article, will continue to evolve and become a feature of EBU communication. In the future, it is expected that guests will also contribute and contributions are welcome and encouraged.

# Our Campaigns

The key campaigns conducted by EBU and the Commission for liaising with the EU during the period of this report included:

## The European Accessibility Act

This campaign was led by EBU’s member in Germany, DBSV.

On 2 December 2015, the European Commission proposed an “EU Accessibility Act” (EEA), to address the lack of accessibility of a wide range of goods and services.

One of the priority projects for EBU was to secure the adoption by the EU of the strongest possible accessibility act.

EBU worked together with the European Disability Forum (EDF) and ANEC (European Association for the Coordination of Consumer Representation in Standardisation) to lobby for a really strong, effective EAA. This involved meetings with representatives of the European Commission, the Council of Member States (the Council) and members of the European Parliament (EP). We spoke at and/or attended parliamentary events and EBU’s members lobbied their national governments to support a future-proof and broad directive.

IMCO (Internal Market and Consumer Protection), the main responsible parliamentary committee dealing with the EC’s legislative proposal, submitted a draft opinion which did not reflect EBU’s concerns and essential requirements for a strong, wide and robust Accessibility Act, which would take into account the needs of disabled persons for an accessible environment in areas of public transport, ICT, buildings and attached products and services.

Amongst other negative aspects, micro-enterprises were exempt and access services regarding audiovisual media content and services were not included in the European Parliament's final report.

We published a position paper jointly with a press Release in February 2018, as well as a fact sheet,” to inform the trilogue negotiators. Our campaigning efforts then concentrated on pushing the negotiators to reach an agreement by the European Day of Persons with Disabilities 2018 (3 December), and to deliver on the expectations raised amongst blind and partially sighted persons by the initiative of a ‘horizontal’ accessibility act. We issued a press release to urge the Austrian presidency, and later an open letter with EDF and 20 other European organisations, with a press release, ahead of the relevant COREPER meeting at the Council. A provisional political agreement was eventually reached on 8 November by the negotiators of the two institutions, under the impetus of the Austrian presidency.

We welcomed this positive development, after difficult negotiations, but expressed disappointment that the agreement falls far short of the horizontal act initially contemplated.

On 13 March 2019 the European Parliament plenary approved the text resulting from the inter-institutional negotiations (“Trilogue”). The EU Council approved it in turn on 9 April, resulting in its formal adoption. What is in fact a directive now needs to be put into national law and European standards. From the entry into force of the EAA, EU countries will have three years to turn most of its provisions into national law. In parallel, the European Commission will specify the accessibility requirements and develop standards to support the implementation.

We will accompany this critical work to advance the interests of blind and partially sighted consumers. We will also continue to advocate for a filling of the gaps in accessibility requirements left by the EAA, focusing namely on the built environment, public urban transport and the built environment.

## “Right to read” campaign

This campaign is led by EBU’s member in Spain, ONCE.

Another of EBU’s priority campaigns was to get the EU and its Member States to ratify the WIPO Marrakesh Treaty aiming to facilitate access to published works for, amongst others, blind and partially sighted persons. At the beginning of 2016 21 EU member states had expressed their consent to ratification of the Marrakesh Treaty. However 7 member states had formed a blocking minority to prevent ratification on the grounds of an unsubstantiated lack of EU competence to ratify. Nevertheless, all legal experts, including the legal services of the EC, the Council and the EP insisted that exclusive EU competence to ratify was beyond any doubt.

EBU sent an official letter to Mr Jean-Claude Junker, EC President, and Mr Andrus Ansip, EC Vice-President to express our great concern at the absence of EU ratification of the Treaty. In response to this letter, EBU met top EC officials. The outcome of these meetings was considered positive and optimistic overall as the Directive and Regulation prepared for the implementation of the Treaty had been given the green light with very minor linguistic modifications. It was hoped that the legislative process and Council approval would be “fast tracked” with very few or no controversial amendments and no “second reading”.

On 8 September 2016, the EU Advocate General concluded that it is the “exclusive competence of the EU” to ratify the Treaty. The European Court of Justice subsequently confirmed the “exclusive competence of the EU”.

On 14 September 2016, the EC presented a Directive and a Regulation to implement the Marrakesh Treaty into EU law.

The proposed regulation to be approved by the EP and the Council is generally a “one to one” transcription of the Treaty text.

EBU had always made very clear its opposition to any inclusion of mandatory commercial availability or remuneration clauses (or other barriers) in the legal texts. Through the ratification by more than twenty countries, on 30 September 2016, the Marrakesh treaty came into force, as provided in its article 18.

On 19 October 2016, a strategy session was held in the EP to consider the Directive and Regulation. Participants all expressed their support for swift EU ratification. The first steps were taken to establish a strong cross-party coalition with civil society support for fast-track parliamentary approval of the Marrakesh legislation while at the same time opening a dialogue with EU member states in the Council who were also considering the legislation.

On 14 December 2016, over 40 MEPs, political group advisors and EC officials attended a “shadows meeting” in Strasbourg. All the MEPs present expressed their overall support for the EC proposals.

In 2017, the EBU campaign "Access to books" focused on the EU ratification of the WIPO Marrakesh Treaty (MT) aiming to facilitate access to published works for, amongst others, blind and partially sighted persons. Intensive lobbying was carried out with European Institutions concerning the “EU Marrakesh legislation”. In parallel with following-up the Trilogue negotiations and EU member states’ positions, EBU participated in numerous meetings in Brussels with EP rapporteur MEP Max Andersson and other key MEPs dealing with the legislation, controversial amendments and the timetable. On 13 July 2017, EBU organised an e-workshop on the MT aimed at its EU national members to coordinate our lobbying efforts, rewarded through the approval of a directive and a regulation (both published in the Official Journal on 19 September 2017). In addition, EBU welcomed the agreement on the legal framework for EU ratification reached by the Council on 22 September under the Estonian Presidency. This agreement was meant to be approved by the EP in January 2018.

Also, EBU attended in September 2017 a conference organised by WIPO in Moscow (Russia) regarding the ratification and implementation of the MT in Russian-speaking countries.

Finally, EBU organised in early December 2017 a training course (TC) on the ratification and implementation of the MT in Western Balkan countries.

A strategy was set to coordinate and ease the process in this region, of which a certain number of countries are EU candidate countries.

In 2018, we continued to focus on the EU ratification of the Treaty. Our efforts also concerned the transposition at national level of the EU’s Marrakesh Treaty-related Directive.

We issued and circulated to key MEPs a press release ahead of the European Parliament’s discussion and vote, on 18 January, on whether to enable the ratification of the Treaty. The vast majority of the European Parliament voted in favour, opening the way for the Council to ratify the Treaty; and on 13 February the Council adopted a decision approving the conclusion of the Treaty, effectively enabling the EU to ratify the Marrakesh Treaty.

The focus of our campaigning then shifted on the transposition of the directive laying out the rules for the implementation of the Marrakesh Treaty in national legislation. In joint lobbying efforts, the EBU central office and our national members called EU countries not to opt for “compensation rights” – denounced as a “tax on accessible works” – for rights holders and publishers, and not to impose a requirement for authorised institutions to be on an agreed list. Eventually the EU ratified the Treaty on 1st October 2018, shortly anticipating the date (12 October) of entry into force of the related EU regulation and directive, as well as the deadline (11 October) for the transposition of the directive in the laws of the EU countries.

EU countries had till 11 October 2018 to bring into force the national legislation necessary to comply with this Directive. Almost a year after deadline, 3 EU Member States are still being pressed to adopt implementing measures: Greece, Luxemburg and Slovenia.

The future focus of this campaign will now shift to obtaining wider participation to the Treaty in non-EU European countries, while supporting our member organisations in their efforts to obtain – where relevant – a more satisfactory implementation of the Treaty and related EU directive in their respective national laws.

In 2019, jointly with the European Disability Forum, EBU started liaising with the Federation of European Publishers (FEP) to exchange of information about the practical implementation of the Marrakesh Treaty and the European Accessibility Act (EAA), and to discuss cooperation with regard to the challenge of creating of accessible e-publications. Joint contacts with Adobe and Amazon have started in follow-up.

## Accessibility of public sector bodies’ websites

EBU was able to secure a strong EU directive to make public sector bodies’ websites and mobile apps accessible. EBU campaigned to ensure that all policy makers understood. that most people now consult web content on mobile devices and through apps, and that apps are often the easiest way to access a service or information, including for blind and partially sighted people. We lobbied the Parliament, Council and Commission intensively to ensure the fullest possible scope for this Directive.

After adoption by the Council in July 2016, the European Parliament approved the directive on 26 October 2016. The final directive was published on 2 December 2016.

It should ensure that people with disabilities - especially persons with vision or hearing impairments - will have better access to the websites and mobile applications of public services. Member States had 21 months to transpose the directive into national legislation, after it entered into force on 22 December 2016.

23 December 2018 was the deadline for the European Commission to publish the implementing acts related to the Directive. We participated in consultations for the content for these implementing acts.

23 September 2018 was also the deadline for Member States to transpose the Directive into national law and to let the Commission know which national bodies will be responsible for (a) the enforcement of the Directive and (b) monitoring and reporting on its implementation. To-date two countries (Bulgaria and Ireland) have still not communicated their measures.

Since 23 September 2019, all newly created websites have to be accessible. Already existing websites will have to be adapted by 23 September 2020, and mobile applications have one more year.

## “Silent vehicles” Campaign

This campaign is led by EBU’s member in Germany, DBSV.

Securing a UNECE (United Nations Economic Commission for Europe) Global Technical Regulation including a fit-for-purpose Acoustic Vehicle Alerting System (AVAS) which cannot legally be turned off was one of EBU’s priority projects of this campaign. In February 2016 the QRTV (working group on Quiet Road Transport Vehicles), in charge of devising an UNECE regulation specifying technical requirements and testing procedures for an AVAS for electric and Electric hybrid vehicles, met to discuss the concerns of WBU and EBU. These concerns were the prohibition of a pause switch, a stationary sound (which constantly indicates the presence and operation of a silent vehicle) and the establishment of a minimum sound level which ensures a sufficient audible detectability of a vehicle to make safe crossing decisions.

In March 2016, the UNECE adopted the regulation 138 on uniform provisions for quiet road transport vehicles, like electric and electric hybrid vehicles. The regulation establishes minimum operational parameters for an acoustic vehicle alerting system, emitting an artificial sound up to 20 km/h. In January 2017, some amendments for the regulation were underway like the prohibition of the pause switch, which could have suspended the operation of the AVAS (Acoustic Vehicle Alerting System).

In March 2017, the WP.29 (responsible for the adoption of vehicle regulation at UNECE) adopted an amendment which prohibits the pause switch in electric and electric-hybrid vehicles. In July 2017, the EC adopted a delegated act which amended annex 9 of the EU regulation EU540 on the sound level of motor vehicles, according to the provisions of the UNECE regulation.

In addition, a new study was conducted by BAST (Bundesanstalt für Straßenwesen) to verify the need for a stationary sound for electric vehicles. The results were presented in September 2017 in Dresden and revealed that a stationary sound is useful for pedestrians, however, only if it is composed in a certain way to enable pedestrians to audibly detect it.

At the beginning of 2018, the EU had adopted most of the updated UN Regulations on Acoustic Vehicle Alert Systems (AVAS) into its legal framework. The only missing legal element was a definitive ban on the pause switch. In addition, there is a general lack of awareness regarding the dangers of silent vehicles for visually impaired road users.

In May 2018, we addressed this topic in a presentation at the International Transport Forum in Leipzig. In October 2018, we commented via ANEC on the first draft of the delegated regulation by the European Commission regarding the ban on the pause switch. In November 2018, we released an awareness-raising document Questions and Answers on AVAS and the relevant legal framework in EU Regulation 540/2014, clearly describing the issues, the legal progress and state of play, and our ongoing concerns; this document has been translated by several EBU Members for national use.

In December 2018, the EBU Campaign Lead contributed an editorial to the magazine “Government Europe”, spelling out remaining demands for the coming years. We also circulated the Q&As in connection with an animated Christmas/New Year greetings card sensitising on the danger of silent cars, playing with the tune “Silent Night». At the turn of the year, EBU assessed the final proposal for the Commission’s delegated regulation to ban the possibility to pause the AVAS on silent cars, in accordance with UNECE Regulation °138.01, and prepared its response to the corresponding consultation in January 2019.

## Accessibility of payment terminals

This campaign is led by EBU’s Dutch member, Oogvereniging Nederland.

Millions of disabled persons, blind and partially sighted and senior citizens in particular, are not able to use payment terminals on their own. They are excluded from carrying out payments independently in shops, restaurants, stations, etc. In an inclusive society, all payment terminals should be accessible to all users. That is why EBU is engaged in lobbying for standardisation and accessibility of payment terminals on a European level.

To strive for barrier-free access to payment terminals for all, a single-issue platform Pay-Able was set up. The platform was officially launched on June 22, 2016 in European Parliament and gained the support from EBU and other disability organisations.

On November 17, 2016, EBU held an e-workshop on accessible payment terminals. It was attended by 20 representatives of EBU members, from 14 different countries. It contained presentations with information in relation to payment terminals from different perspectives.

During 2017: Pay-Able continued its dialogue with the payment terminal industry and gave a presentation during the EC Workshop on Accessible Products and Services on 22 February. They also met with MEPs and Permanent Representatives to discuss the European Accessibility Act (EEA).

At the end of 2017, the campaign bore fruit as both Council and Parliament included payment terminals in the scope of the EAA (see above). Our action in 2018 therefore consisted essentially in monitoring developments and recalling our position every once and then, to make sure that this achievement would not be questioned in the ongoing legislative process. In fact, it never was.

In parallel, we also continued to lobby for accessibility-mindful standardisation of payment terminals on a European level, particularly in the context of the Austrian presidency of the EU. The Pay-Able campaign was presented during the 16th International Conference on Computers Helping People with Special Needs (ICCHP) in July Linz, as well as at the first Accessible Europe: ICT for ALL conference in Vienna in December.

## The campaign for full accessibility of lifts

This campaign is led by EBU’s member in Austria, BSVÖ in close collaboration with ANEC (European consumer voice in standardisation).

In relation to the accessibility of lifts, lack of awareness regarding the importance of measures that allow people with a visual impairment to use lifts autonomously is a big problem. While it is broadly understood and accepted that certain specific requirements such as access without steps, a minimum door width or enough space inside the lift car are necessary requirements, it is not yet widely accepted that, for example, the usability of control devices is just as necessary to ensure the accessibility of the whole lift. Therefore, people with visual impairment often experience serious difficulties in using lifts.

During the last months of 2015, a comprehensive EBU joint statement responding to the draft of standard EN 81-70 was prepared and made available to national standardisation organisations for public enquiry. After the public enquiry, no action in relation to EN 81-70 was required until September 2016, when EBU was made aware of CEN/TC 10/WG 7’s (the committee responsible for the revision of EN 81-70) intention to reduce requirements for contrast of signage on operating elements (e.g. buttons) in lifts in the standard. EBU drafted a statement responding to a ballot of the CEN/TC 10 secretariat amongst national standardisation bodies on the issue and explained why the intended reduction was unacceptable.

EBU members also lobbied the national mirror committees and ANEC supported the position. Special emphasis was put on the violation of e.g. provisions of the UN Convention on the Rights of Persons with Disabilities.

In the ballot of November 2016 the majority of CEN/TC (10 members) voted for the reduction of contrast requirements. Following EBU’s and ANEC’s objection a second ballot was circulated to confirm the results and launch the Formal Vote. EBU members intensified their efforts to convince the national mirror committees to vote against the reduction of contrast requirements. The number of negative votes increased but there were not enough to avoid the adoption of the intended reduction of contrast requirements in the draft and launch the Formal Vote. Regrettably, in spite of all its efforts, EBU was not successful in avoiding the imminent reduction of contrast requirements in EN 81-70.

Unfortunately, in early 2017, CEN/TC 10/WG 7 could not be convinced to retract their decision to reduce the requirements for contrast of signage on operating elements (e.g. buttons) in lifts. Therefore lobbying activities continued to try and convince national mirror committees to reject EN 81-70 in the Formal Vote due to insufficient contrast requirements. In May and June 2017 a Formal Vote was launched leading to intensified negotiations with national mirror committees, and in June 2017 EN 81-70 was approved in the Formal Vote (only four negative votes).

EBU supported of ANEC’s appeal against the ratification of EN 81-70 by approaching national Technical Board members and writing a joint letter also signed by AGE Platform Europe and the European Disability Forum (EDF) to responsible authorities at CEN (European Committee for Standardisation) and CENELEC (European Committee for Electrotechnical Standardisation).

Following a Conciliation Panel in December 2017, which rejected ANEC’s request not to publish it, we anticipated that the updated EU standard for accessible lifts (EN 81-70), eventually published on 16 May 2018, would be disappointing, namely due to insufficient colour-contrast requirements for operating buttons. We nevertheless continued to support ANEC, through providing expertise on the perspective of blind and partially sighted persons, to maintain pressure on CCMC (CEN CENELEC Management Centre) about the Conciliation Panel’s decision to revise the standard should the study to be conducted by an independent research organisation confirm that the contrast values are insufficient.

However, our lobbying in 2018 also (increasingly) targeted the basic lift standard (EN 81-20) as part of the “Design for all” approach – which requires to mainstream accessibility standards – asking for accessibility requirements to be included in the basic lift standard EN 81-20 instead of having a separate standard for accessibility largely ignored by business anyway.

Besides, we closely monitored and supported the approval in national standardisation organisations of the European Draft standard EN 17161 about Accessibility following a Design for All approach (yet to be published).

We hoped that a revision of the European Lifts Directive would provide another opportunity for influencing legislation, but we learned in December 2018 that, based on the final report on the evaluation of the Lifts Directive, the Commission finds no reason to revise the directive. However, before proceeding with the publication of the reference to EN 81-20:2018 in the OJ, the relevant unit invited us to provide a technical position paper explaining why we feel the revised EU standard for accessible lifts does not meet the test of universal design and was not elaborated taking into account the views namely of disabled persons organisations.

Very much aware that it is crucial to improve EN 81-70, expected to form the basis for an ISO 8100 worldwide standard in the making, on 28 February 2019 we sent a technical position paper to the Commission, after consulting with our partners ANEC and EDF. In the paper we argued that the revised standard CEN 81-70:2018 does not provide sufficient guidance for the implementation of lifts to be used by the widest possible range of users (including blind and partially sighted persons) and to meet the requirements of the United Nations Convention on the Rights of People with Disabilities (UNCRPD) and of the Lifts Directive, and fails to seriously take into account the views of societal stakeholders, namely of the EBU. We asked the Commission to refrain from proceeding with the publication of the revised standard in the Official Journal, or otherwise to do so with a restrictive notice. Incidentally, we argued that it would be appropriate to include the lifts accessibility requirements of EN 81-70 in the lifts safety requirements of EN 81-20, as the latter is much more widely respected by the industry in practice.

On 6 March the European Commission’s relevant unit informed us that they had rejected the publication of references of EN 81-70:2018 in the Official Journal of the EU under Directive 2014/33/EU on lifts and safety components for lifts, and that a likely consequence is that CEN will need to further improve the standard. In doing so, the Commission expects CEN to “carefully listen to all concerned parties”.

We will continue to follow the fortunately ongoing revision of the accessible lifts standard, feeding into the ANEC participation in that work

## Audiovisual Media Services (AVMS)

The new EBU Head of Campaigning acted as leader in what was essentially a lobbying activity.

Given the failure of previous non-legislative approaches, EBU had called for a strengthening of article 7 on accessibility in the revised AVMS Directive.

Unexpectedly the Commission had proposed to delete the article, leaving to the newly proposed European Accessibility Act to set the obligation to make AVMS accessible for persons with disabilities. Fortunately, in their respective amendments, both the Parliament and the Council agreed to keep and strengthen the article. The trilogue negotiations ran well into 2018. Our lobbying consisted in monitoring the largely satisfactory state of play of the negotiations on Article 7, while expressing support for the Parliament amendments for consultation of disabled people’s organisations – but not to the point of putting the agreement reached so far at risk. Eventually, when a final provisional political agreement was reached in April, we expressed our support with rapporteurs and shadows and key MEPs within the CULT committee of the Parliament, in e-mails jointly with our relevant national members as well as through Twitter. In July, the lead committee of the Parliament approved the agreement, and we continued to express our support for the text ahead of the plenary vote. After the European Parliament’s approval on 2 October, the EU Council approved in turn, on 6 November, leading to the formal adoption of the revised directive – which we welcomed in a press release of 8 November. The new directive entered in force 18 December, and Member States have until 19 September 2020 to translate it into national legislation. We support our national members to secure a meaningful transposition.

## Other Campaigning Topics

EBU’s campaigning work also included the following (in chronological order):

* Three position papers on rehabilitation;
* Response to the consultation on the evaluation and review of the regulatory framework for electronic communications;
* Response to the consultation on the regulatory environment for platforms, online intermediaries, data and cloud computing and the collaborative economy;
* Response to the consultation on the eGovernment Action Plan 2016-2020
* Response to the consultation on the revision of the European Interoperability Framework;
* Response to the consultation on reduced VAT rates for electronically supplied publications;
* Response to the consultation on the European Pillar of Social Rights;
* Response to a Commission consultation on long-term unemployment;
* Response to a Commission consultation on automated driving;
* Lobbying the European Parliament jointly with the Federation of European Publishers for an accessible books-mindful Horizon Europe Regulation, and response to the consultation on that Regulation;
* EBU Statement on the European elections 2019, signalling the EBU priority concerns for the new legislature;
* Support of the petition launched by the European Disability Forum on 3 December, calling for action from EU Governments to ensure accessible voting in 2019;
* Response to the consultation for the evaluation of the European Disability Strategy 2010-2020.

## Campaigning capacity-building training

In September 2016, a Twitter masterclass was held in Brussels with a view to equipping members of the EBU campaigns network with skills on how to directly interact through Twitter as individuals with EU legislators and national governments on issues of importance to EBU. Hosted by EBU’s member in Belgium, Brailleliga - Ligue Braille, it offered a training opportunity to 10 new participants from 6 countries.

A TC on the EU policy-making process, to improve EBU members’ campaigning skills at EU level, was also held in December2016 in Paris (France). 15 EBU volunteers or staff members of EBU organisations from 10 countries participated in the first edition of this TC, which was reproduced in 2017 and 2018.

National campaigners from different countries attended these TCs on effective campaigning skills. Although each campaign requires a different approach and different tactics, they were trained to use common rules summarised into a step-by-step guide and an influencing toolkit.

The e-workshop on the Marrakesh Treaty (MT) was eventually replaced by a physical TC held in Okroglo, Slovenia, in November and December 2017. Co-funded by the Open Society Foundations and attended by 37 participants and speakers from Albania, Bosnia-Herzegovina, the Former Yugoslav Republic of Macedonia, Montenegro, Serbia, Slovenia and Spain, the TC aimed to provide support to stakeholders involved in the MT ratification and implementation in the Balkan region. Representatives from national visual impairment organisations, libraries for the blind and ministries discovered the treaty in-depth (including the long-standing EBU campaign) and support tools (e.g. WBU guide) were presented to them.

Also, with the aim of empowering our members and helping them in both their national and EBU-related international campaigning work, we started a series of “how-to” campaigning memos. The first two editions focused on position papers and advocacy meetings, and will both have been complemented by e-workshops by the end of 2019.

# Specific Areas of Activity

## UNCRPD monitoring

Following on the process initiated in 2015, EBU produced analysis and comparison reports on the following articles:

* 28 “Adequate standard of living and social protection” (2016)
* 7 “Children with disabilities” (2017)
* 26 “Habilitation and rehabilitation” (2018)
* 33 “National implementation and monitoring” (2019)

## UNCRPD training and awareness-raising

EBU delivered a publication entitled “The UNCRPD - A new look at our human rights.” The document, the production of which was led by EBU’s member in Portugal, is intended for blind or partially sighted citizens or others who regularly interact with them. It explains the rights set out in the UNCRPD and what they mean in practice for people with disabilities and blind and partially sighted people in particular. It will assist people in better understanding their rights and how to defend them. The publication is available in English, Italian, German, Polish, Croatian, Portuguese, Icelandic and Lithuanian and will progressively be translated in new languages in the years to come. Further to each translation, EBU members organized sessions attended by a total of 339 persons.

## Blind and Partially Sighted Women

The toolkit “The future we want” was produced in 2015 to promote gender equality and the empowerment of women with visual impairments and mobilise organizations of persons with visual impairments to focus. It is available in English and Spanish and should be translated in the coming years. Based on that toolkit, two training sessions were held in 2016: a face-to-face session prior to an EBU Board meeting conducted by the European Women Lobby and an e-workshop attended by 10 countries.

A video entitled “The roads that lead to the top: a video on blind and partially sighted women’s leadership” was also produced in 2017. It portrays the stories of ten women who are blind or partially sighted and traces the paths they followed towards pursuing their dreams. The transcript of the video is available in English, French, German and Spanish.

In order to encourage the involvement of women in EBU’s work and decision-making process, in 2018, we initiated the GEAR (Gender Equality Awareness-Raising) activity. A survey report on gender equality within member organisations was delivered. From a governance perspective, while EBU organisations’ women membership is 55% on average, only 9 responding countries have at least 41% of women elected as national board members. Also, the share of women presidents is higher at the regional level than at the national level. From an operational perspective, 14 out of 24 survey participants have or have had activities during the past years intended specifically for women. Respondents also made the following 4 recommendations to improve gender equality within EBU work: empower women within EBU member organisations, arrange equal representation in decision-making bodies (e.g. changing the meeting procedures to make them more transparent and logical), involve men in the process, reaffirm gender equality as a cross-cutting issue. The GEAR conference held in Malmö, Sweden, in June 2019 was also the opportunity for 60 participants from 16 countries to exchange on the issue.

## Low Vision

The vast majority of people with sight loss have low vision or partial sight, two terms for the same condition. Individuals with partial sight can have very different amounts of vision and ways of seeing and therefore have very different needs for support and services. Their specific needs can only be met adequately in a personalised way. EBU worked in that direction in the past years.

In 2016, the EBU Low Vision network produced an awareness-raising video on low vision. The video features testimonials from a diverse selection of partially sighted (PS) Europeans. It presents several forms of partial sight, examines the obstacles and challenges faced by partially sighted persons every day and looks at solutions, as well as examples of PS persons’ attitudes which colleagues might misinterpret. Particular emphasis is also put on the need to move from a medical definition of low vision to a functional one relying on the principle of useful vision. Finally, the video presents EBU’s standards on low vision services in Europe developed in 2014 and their close link with the UNCRPD.

To continue this ongoing work, an EBU expert attended the international VISION 2017 Conference held in The Hague (Netherlands) in June 2017. Organised by the International Society for Low Vision Research and Rehabilitation (ISLRR), it was the perfect place for EBU to mingle, network, present and promote all the work carried out.

Still in 2017, a follow-up survey to map the situation on low vision services in EBU member countries was planned. It was decided to merge it with the survey on UNCRPD article 26 (see above). Many survey replies did not indicate differences between services for the blind and services for partially sighted individuals, suggesting that this data is not easily available.

Low vision was also the topic of the first EBU annual conference held in Lasko (Slovenia) in June 2018. Entitled “Low Vision Services, A Global Right - Setting the Standards in Europe”, it aimed to both facilitate the implementation of EBU Standards for Low Vision services throughout Europe and to help create/strengthen national low vision networks. 70 low vision and partially sighted persons, rehabilitation professionals, ophthalmologists, optometrists and orthoptists from 25 countries attended the event and exchanged on a wide range of topics including improving access to and delivery of low vision service delivery (e.g. through better staff training and multidisciplinary teams), increasing lobbying towards their full implementation (in particular following a human rights-based approach), broadening the membership of national visual impairment organisations to individuals with moderate low vision. Good practice and experience sharing was a core feature of the event.

## Working for Elderly Blind and Partially Sighted People

Though its official duration has long since ended, the VISAL (Visually Impaired Seniors Active Learning) project proved useful and provoked interest. In 2016 and 2017, new VISAL facilitators were trained in Premantura (Croatia) and Warsaw (Poland) and VISAL courses were held in Croatia, Greece, Hungary, Iceland, the Netherlands and Poland, empowering 94 blind and partially sighted seniors. In early 2016, VISAL was also selected as a “success story” by a panel of experts from the Directorate General for Education and Culture of the European Commission.

A new activity entitled AGEBU was implemented in 2018 to collect blind and partially sighted seniors’ needs at grassroots level and develop tailor-made programmes so as to increase their independent living and participation in society. By the end of 2019, focus groups involving 46 panellists will have been held in Austria, Croatia, Cyprus, Romania and Slovenia. Information collected will have been compiled into national project concept notes.

From 2014 to 2016, EBU also contributed in the EU-funded research PRO4VIP project (Innovation Procurement for visually impaired people). It aimed to define/revise public procurement policies to develop new innovative solutions for the early diagnosis and clinical treatment of partial sight as well as the development of assistive technologies. It focused on the collection and prioritising of the needs of both partially sighted persons in terms of assistive technology and of clinicians in terms of instruments for diagnosis. Focus groups were held in Cyprus, the Netherlands and Slovenia, involving 54 PS panellists in total.

## Working for and with younger people

In collaboration with ICEVI Europe, the Comenius University of Bratislava (Slovakia) and the ELTE University (Budapest, Hungary), EBU delivered the 3 following reports:

* Pilot Survey Among Erasmus+ and Disability Coordinators (2017)
* Accessible Universities for Erasmus+ Students with Visual Impairment (2017)
* Recommendations for students with visual impairment participating in international exchange programmes (2018)

In addition, EBU has worked towards improving employment perspectives of blind and partially sighted young job seekers.
In 2016 and 2017, EBU organised two training courses on the employability of young blind and partially sighted people in Tirrenia (Italy). The 19 participants from 9 countries organised in turn local discussion sessions involving a total of 322 participants. The notion of non-verbal communication and body language, a sensitive issue for blind and partially sighted persons, was introduced.
The ADVISE approach (AiDing Young Visually Impaired Seeking Employment) devised in 2018 is also being tested in 4 EBU member countries. It consists of both a one-day training course and individualised coaching, ideally by a visually impaired and a sighted coach. A trainer manual has been devised and the EBU Manual for inexperienced job-seekers with a visual impairment developed in 2015 was updated. Version 3 (2019) is available in English, French, German, Montenegrin, Polish and Spanish.

Finally, in order to broaden awareness of EBU amongst member organisations and encourage the involvement of young people in our work and decision-making procedures, EBU initiated the EByouth activity. 16 national leaders were appointed and 4 EByouth Team Members (i.e. European leader) from Bulgaria, Croatia, Iceland and Slovenia were selected. They participate in a 3-year training programme (2019-2021) comprising e-workshops and face-to-face training courses.

## Report on Access to Braille

In 2016 and 2017, a project group of Braille experts from Nordic countries, led by the EBU member from Denmark, mapped out existing good practices related to Braille usage and teaching with a view to promoting its availability in all relevant situations and environments in society. 4 main actions were implemented:

* Desk-based research (2016).
* Data collection in 9 countries: Denmark, Finland, Iceland, Norway and Sweden (2016); Austria, Estonia, France and Italy (2017).
* Country visits: To supplement the information gained through the questionnaires, members of the project steering group met country representatives in Estonia, France in Italy (autumn of 2017).
* Events:
	+ A Nordic Braille workshop was held in Denmark in October 2016
	+ Working group members exchanged internally and with other key experts on the occasion of the 9th ICEVI international conference (July 2017, Bruges, Belgium)
	+ A specific seminar (November 2017, Frederica, Denmark).

A final report on “Braille teaching and literacy” was delivered in early 2018. The main conclusions and recommendations are:

* Lack of monitoring of progress of blind children’s Braille literacy.
* Braille usage should be extended to a wide range of situations including better identification of objects, easier navigation, better access to services, increased social interactions (e.g. card games), or personal development and lifelong learning.
* Need to promote cheaper and already-existing technical display-based Braille devices.
* Need for visual impairment organisations to collaborate with parents’ organisations to raise awareness on the importance of Braille.
* Need to establish a Braille authority in all European countries.

## Good practices on accessibility

In 2018, EBU started to collect, summarise and disseminate best practices in Europe related to a specific area of accessibility.

The 2018 competition focused on Employment. 14 **national contributions were compiled into a report available in 10 languages. Winning countries were the UK, Germany and Italy.**

The 2019 competition focused on **Transport & Mobility. 8 national contributions were compiled into a report available in 11 languages. Winning countries were Slovenia, Czech republic and Germany.**

# EBU’s Networks & Friends

In order to share our specific experiences and expertise, promote exchange within networks and combine our voices on common dossiers, we regularly work with partners and friends. These fruitful and friendly collaborations take the form of exchanging expertise to prepare joint position papers, articles or press releases, responding together to consultations or representing each another at important events.

EU-funded projects such as BaGMIVI, PRO4VIP or PasCAL (started in Mid-2019) also allow us to collaborate with third-party organisations (universities, industrial partners, other NGOs).

The collaboration with EDF, the European Disability Forum, is ongoing as we were one of the founder members, together with other disability organisations.

EBU is represented in a number of EDF working bodies so that the visual impairment dimension is fully considered. The chairman of our Commission for Liaising with the EU is also the Secretary of EDF. EBU continues to collaborate closely with EDF on a number of important campaigns, and this has proved to be an effective collaboration.

## International Council for Education of People With Visual Impairment (ICEVI Europe)

In addition to collaborating with EBU on the above-mentioned report on the accessibility of student exchange programs, ICEVI Europe continued to work closely with us, and the two organisations regularly share information through their respective newsletters.

# Other activities

The Onkyo Braille competition - EBU runs the European strand of the Onkyo World Braille Essay Contest, an international initiative to promote Braille literacy and to encourage the sharing of social and cultural information amongst blind and visually impaired people.

The contest is sponsored by Onkyo Corporation, a Japanese consumer electronics manufacturer and the Braille Mainichi, part of Mainichi Newspaper Company in Japan. It was created in 2003 and has been a great success ever since.

# Beyond Europe - Solidarity with our friends worldwide

In October 2016, EBU set up the “Solidarity Fund” mainly to support the EBU member countries who are experiencing difficulties in paying their Membership Fees, organising or participating in projects or meetings. Further details are available from the EBU central office.

# Concluding remarks

It is obvious that, in order to perform this widespread work, EBU depends on a skilful and effective working team. This is provided by our Central Office in Paris. Thanks to their permanent accuracy and reliability EBU was again able to cope successfully with the many challenges of the past four years. However, equally important was the support of EBU’s national members and, in particular, the commitment and dedication of friends and colleagues within the national organisations. I like to thank all those nice people who lent a helping hand when it was needed. It is the members that constitute EBU. It will be most important to keep this in mind, especially, since EBU has created a new structure of its work.

While the economy of this world is increasingly organized on a global level and gaining more and more political power, we are facing a growing movement of people throughout Europe, seeking their fortune in shrinking their country back to a stage which, in the past, has never proved to bring about peace, lasting prosperity, and justice. As a strongly convinced European citizen, I am deeply concerned by this development. I, therefore, appeal to blind and partially sighted people all over Europe: Join your national organisation, stand for solidarity and mutual support and fight against all efforts to weaken or even destroy our community that for more than 30 years has successfully raised our voice throughout Europe and, as part of the World Blind Union, throughout the world.

By order of the Board:

Wolfgang ANGERMANN

EBU President

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