Lukas (00:00:01):

Welcome everybody to our webinar, How to Comply with the European Accessibility Act. This webinar is kind of a partnership between Typefi and Maverick Publishing Specialists, and Will Awad is with us today from Maverick and he's going to talk about how you can ensure compliance with the EAA. So just very quickly, I'm going to do a few little introductions. So first I just want to shout out Maverick, they are a partner, a publishing consultancy founded in 2008. They have offices pretty much all over the world in the EU, the US and the Asia Pacific region. And they do a lot of different things, but really tailored towards publishers and publishing. So these are some of their services that they offer, from digital strategy to production, workflows, marketing, SEO, search engine marketing, all these types of things. If you have a need for any of these services and you're in publishing, please definitely reach out to Maverick. I will post some contact information in the chat in just a few minutes.

(00:01:38):

So moving on, we have Will Awad with us today and he's going to be talking about this topic and sharing some knowledge with all of us. He is a Senior Associate with Maverick Publishing Specialists and he's also the founder of iAccessDigital and he's been in this space for a while. He's a real digital accessibility expert. His background is in academic publishing and publishing services. He's advised on accessibility compliance with W3C, WCAG guidelines across all market sectors. He's done accessibility audits, remediation of documents, and he's really well-versed in things like the ADA and obviously the European Accessibility Act. And he speaks all over at conferences like the Association of University Presses, Access Higher Ground, webinars like this one. And he also has a Master's degree in International Law. So really a true expert on this topic. We also have a few of us from Typefi with us today.

(00:03:00):

Stephen Laverick is our Business Development Manager for Europe, Middle East and Asia. Guy van der Kolk is our Product Manager and kind of our resident accessibility expert. And I am Lukas Kaefer, I'm the Marketing Manager, and I will post our contact info in just a moment in the chat. I'm sure you've all used Zoom before, but just to quickly review, on the left side of the bottom toolbar, you have mute buttons for your video and your mic. I ask that you please stay muted during the presentation, but feel free to unmute if you have a question once we start the Q&A.

(00:03:45):

Speaking of questions, if you do have one, feel free please to just post it in the chat and I will see it and we'll get to that in a timely fashion. You can also just raise your hand, which is over there on the right. And we will be recording this and it will be available within a day and I will send that out by email. So quick background about, excuse me, Typefi, founded in 2001, based in Australia. Our main thing is an automated publishing software that is built on Adobe InDesign. We also have some InDesign plugins, Typefitter and AutoFit, and we also have a product called RunScript that really is cloud services for InDesign Server, lets you use InDesign Server without an annual licence, you pretty much pay as you go. So this is my sort of quick, this is what Typefi actually does, this is the automated publishing software running here, a recorded video, and you see it placing text and images and captions and headers, footers, all these sort of things.

(00:05:04):

And it's doing this automatically and it can do it incredibly quickly at speeds up to about a thousand pages per hour. So in terms of accessibility, we can help you produce accessible formats, all the big popular formats, we can help you produce those very quickly. You can publish your accessible content really in conjunction with your standard outputs and it's a huge time saver. This is one of our clients, PCI, they cut their manual process from seven weeks to just four hours. So really massive time savings with Typefi. And we do have another webinar coming up in January where we will talk a little bit more about this. We'll show a demo, we'll talk about how Typefi handles all these accessibility nuances and features and

we'll explain how Typefi can produce things like EPUBs and HTML really quickly right out of InDesign. So that I will post a link to that webinar registration as well. But that is it for my intro, so I'm going to stop sharing and I will turn it over to Will.

Will (00:06:27):

Thank you Lukas. I'll share my screen as soon as I figure it out.

Lukas (00:06:34):

No worries. Okay. Yep, now I see it. Yep.

Will (00:06:43):

Okay, thank you for the intro, intro Lukas. Hello everyone and thank you for inviting me Typefi for this presentation. As I mentioned, my name is Will and I've been working on making content accessible for the last nine years as I started this journey, and I used to work for a different publisher from Thomson Reuters to Oxford University Press and so on. I have a legal background as we mentioned in my intro and I am a non-practicing lawyer. So as everybody says in their presentations, disclaimer, we are not lawyers and we are not here to give a legal advice. So if you need a legal advice, you better seek legal counsel advice, but I will give you my opinion on this European Accessibility Act. So what is, I mean basically let's say the presentation will be about 45 minutes, 40 minutes and we'll be discussing the following points as you say, what is the EEA actually says, the different penalty in different countries, workflows, AI, and alternative text.

(00:07:54):

And we will touch on PDFs because that's a burning question for every publisher business in the world at the moment and we'll take any questions you might have. So what is digital accessibility? So basically, digital accessibility is about ensuring or making content fully accessible to people with disabilities. So making sure it's equal and it is building an inclusive society, making sure the content is accessible and everybody has equal opportunity to access the content in this, let's say digital world and society. So that is what's digital accessibility. So this has been here for a while. So then in 2019 we have something called the European Accessibility Act. What is the European Accessibility Act? This act came in 2019 and the European Accessibility Act is only a directive, came from the EU, that established minimum requirement for digital accessibility. Basically its main objective was, sorry, its main objective was to make sure that any product or service might be digital content technology accessible to people with disability in the EU. So the act defines what is a person with disability, it's the same definition of the United Nations Convention of Rights for Persons with Disabilities, define it as a person with disability as those with a long-term physical, mental, intellectual or sensory impairment which may hinder their full and effective participation in society on an equal basis with others. So this is the same definition that the United Nations Convention of Rights of Persons with Disabilities is.

(00:09:58):

So everybody is wondering, what is exactly the European Accessibility Act and what applies to what businesses? So the European Accessibility Act basically applies to any business with more than 10 people and any business that provides a product or service to the EU, whether you are based in the EU or not. So if you are an entity based in the US, UK or in the Middle East and you have business in the EU for providing product or service to the EU, that product or service must comply with the European Accessibility Act. I want to emphasise the point that even if you are an entity not registered in the EU, so if you are in the US providing journals or providing services to the EU, then your product or service must be accessible by the deadline for the Digital Accessibility Act. So what does the EAA cover? So as we said it covers two things: product and service. The EEA article two states exactly what are the products and services that must be covered under the EAA, and it's stating operating systems.

(00:11:19):

That's the product, will be operating systems, hardware, TV equipment, e-reader, which is mainly for publishers, self-service terminals like ticketing machine, ATM. And the service here, as I mentioned the product was the e-reader and the service is the eBook. So making sure that the eBook is fully accessible. Banking services, transport service, e-commerce website. Basically that's the service that you provide to the EU. That product and service must be compliant with the Web Content Accessibility Guidelines and with the EAA, so to make sure it's fully accessible and compliant. So the services, so the requirement of, what is the requirement of the EAA? The EAA provided two annexes for the requirements, the EAA outlined the requirement, product and service for example, ensuring that interfaces are perceivable, operable, and understandable for users with disabilities. And the annex two it's mentioned, provides a solution to help meet this requirement.

(00:12:28):

For example, including screen reader compatibility for digital interface. So basically if we take a website, if you have a website, that website should be perceivable, basically caption for video, transcription for audio, alternative text for images that is perceivable, it's operable, you can use any keyboard to access the website. So that is the second requirement. Third, understandable. So it's clear, there's a clear message. For example, if you say submit a request, that request, if there's a message, error message, it'll tell you there's an error message here, it hasn't submitted, et cetera. So if there's a colour issue, it'll describe that as well. Robust, it must be able to work in different web browsers. For example, it's Chrome, whether it's FireFox, whether it's iOS, it should work on that. So this is how the requirement for EEA should be. It's all stated in annex one and annex two of the European Accessibility Act.

(00:13:36):

So the burning sensation is when is this act coming into force? So the act is coming into force on June 28th, 2025. So basically by that date, businesses should start ensuring that their content is fully compliant with the European Accessibility Act. By June, 2022, the EU mandated that every EU nation should introduce the legislation into their national law, and to make sure that this EAA is actually into their law and it is going to be followed and the deadline for coming into force is June 28th, 2025. In the legislation, somebody will ask me about grace period. In the legislation there is something to say about the grace period, which means you have until 2030 to comply with the EAA. It's not true. Basically, the grace period is for ensuring that if you are showing good faith, you will have extra time to complete your content. For example, if you have 10,000, 20,000 backlist titles that you need to make accessible and you already managed to only do 30 or 40,000 by June 28th, 2025, you have that grace period to allow you to complete the task.

(00:15:03):

But the grace period does not mean that you have until 2030 to complete your accessibility journey. You have to start now ensuring that your content and your product and service is fully accessible by that date. From 2019, we all knew about the European Accessibility Act. So any business should already start planning, changing the workflow, ensuring that born accessible content, or if they're developing their website, making sure the website is developed with accessibility in mind. So that is the grace period here. So as I mentioned, I studied law and I have a legal certification, but basically I studied one thing: for everything there's a law and for every law there's an exception. So the EAA has exceptions and which means if you are a micro enterprise, basically if you are a small entity with less than 10 people working for you and the business does not produce more than 2 million turnover a year, you are exempt from making your content accessible or your website accessible.

(00:16:14):

However, in my personal view, making sure you're an inclusive business means that you make sure that your content and your product are accessible and that is the whole idea about the EAA, making sure we

live in an inclusive society, everyone equal and the content is shared equally, empowering our EU people and the whole world as well. So everybody says there is something called Disproportionate Burden or Fundamental Alteration. So this is also mentioned in the EAA. So it says if your content or product is going to be altered so massively that's going to cost you so much money, you might be exempt from making this content accessible. But as I said, I am not a lawyer here. I'm not giving legal advice. As the law hasn't come into force, we don't know how Disproportionate Burden is going to be implemented. Ideally, if anybody has doubt on this issue, it's better to seek legal advice on Disproportionate Burden, and as I said the exception may be granted. So even if you provide all the information, you might be granted extra time or you might be granted the exemption or you might not. So ideally you should seek legal advice when it comes to this issue with accessibility and Disproportionate Burden. So the next point I want to discuss is, what happens if I do not comply with the European Accessibility Act?

(00:17:53):

For example, in the EU everybody introduced legislation into their national law and everybody set up their financial penalty and what are the consequences for non compliance. Ireland is the only country who went extreme, that if you do not comply with the EAA, you might end up in prison between six to eight months if you've been convicted or you've been indicted, and you have to pay penalty. In Germany, they have different ruling which mean you will have no access to the German market. So you have an order of cease and desist and you will have penalty as well. But in other European nations you might have to pay a financial fine. Any business thinking about the financial fine and thinking how much it will cost to make a book or the website accessible might find that it is cheaper or most cost effective to make my titles accessible than being sued and getting to pay a fine in the EU. So businesses should consider their penalty here and what is best for business and their reputation. So beyond penalty, we should think about the benefit of making content accessible.

(00:19:16):

Sorry. Okay, so what is the impact of making content accessible? Making content accessible, it's not just a social and moral thing, it's a good thing to do. It's avoiding the legal challenge. There's one, one in five people in the world suffer with some kind of disability and in the US there's one in four. So there's a huge marketplace for making your content accessible that hasn't been tapped by everybody else. I'm not saying making your content fully accessible, you will be reaching this 20% of the population and your income or your business will increase by 20%, but you will tap for these people as well, for the 20% that hasn't been considered in the past. Also, ensuring your content is fully accessible, it aligns with the United Nations Sustainability Development Goals such as Reduced Inequality and Quality Education, which we all want to make sure the world is a better place.

(00:20:26):

So now let's move to the accessible implementation aspect of accessible implementation. So we have three things I would like everybody to consider. We have the regulation, we have the European Accessibility Act saying we should make our content accessible. We have our requirement for making things accessible, which are the Web Content Accessibility Guidelines 2.1 level AA. Just to let you know from next year it will be 2.2 and any work I currently do is complying with 2.2 level AA. So the Web Content Accessibility Guidelines, what are they? They are guidelines developed by the World Wide Web Consortium (W3C) and it provides one single source. So if you are making content fully compliant with the Web Content Accessibility Guidelines, whether you are based in the EU, whether you are based in the UK or whether you are based in the US, it's the same guidelines, it's equal, it is compliant, it's the same thing.

(00:21:29):

So whenever you do content, it always will be the same. It's the international global standard that everybody follows. And the specification for the EPUB. I'm mentioning the EPUB here because a lot of businesses that I work with are publishers. So the EPUB, specification of the EPUB, is Accessibility 1.1

that we follow and it's recommended for eBooks. So what are the core components for accessibility? Now any business here should think about three important things when it comes to making content accessible. Start establishing accessible workflows. We'll talk about that in a bit. Manage alternative text to images and ensure the metadata and colour contrast are correctly identified and added to the content. So with the workflow, Typefi have good software that can produce as they mentioned earlier in the presentation, a good front list, born accessible. So when you are building a frontlist title, always consider to make that title born accessible, which means start by amending your contract with your author so that author, when they send the manuscript, they will make sure that you receive the manuscript with that alternative text included. So when you start working with producing the frontlist, that title will be born accessible. It will have everything that you need to make sure it's compliant with the Web Content Accessibility Guidelines and you produce fully accessible EPUB format.

([00:23:17](#)):

Speak to a vendor or hire vendors who have certification. There's a lot of vendors nowadays that they're certified by a third party to make sure that they meet the Web Content Accessibility Guidelines. There's a few of them here in the US and a few in Europe as well. So there is a good article that Maverick actually have on their website about workflows for accessibility for frontlist and backlist. So for the backlist, this is where the hard work starts. Basically some publishers, they might have a huge backlist conversion titles and for example, they will start by, one, making sure what is the most sellable title? Making a list, categorising all these titles and the most important one for us, the one that has less images. Try to engage with the author and ask them if they're willing to write the alternative text. Maybe that will help to speed things up. And then engage with an accessibility vendor who actually has certification who has experts in this area and also have some teams, hired some teams, or trained their teams on accessibility and on the regulation to ensure that accessible EPUB is compliant and it's exactly what they're looking for.

([00:24:44](#)):

So accessibility here is not just, okay, one step and we're done. It is a daily task that everybody needs to follow. I mean I mentioned here the EPUBs and books, but I want to mention not books, I want to talk about websites because for example, if you are planning to build a new website, can you actually start thinking about the website to be built from day one with accessibility in mind? Because nowadays the website is also the first page that everybody goes to see your product or to know more about yourself. It's the door to your house, and if your website is not accessible then the content might not be accessible so people will be put off and they'll move somewhere else. So you don't want that. So ideally it's the same thing when you are making frontlist accessible, born accessible, you make sure that when you are building a new website, make sure that website has accessibility in mind.

([00:25:46](#)):

I'm discussing this because we are going to mention it later on what you need to do when it come to websites. So after the backlist, the first component, the workflow, the second component was the alternative text and artificial intelligence. Okay, what is the alternative? Alternative text or alt text, it's just basically a description of the non-text content in the book. So it provides information about an image that visually impaired, when they're using assistive technology, it'll describe that for them. It could be a flow chart, it could be an Eiffel Tower, image of the Eiffel Tower. So this is an important aspect of accessibility. Whether it is an eBook, whether it is on the website, or whether it is in a PDF document, which we're going to talk about later, that image should have a description and that description is important for people with disabilities because it will give them a lot of information that you and I can see, but they can perceive it in their mind when the description is read to them.

([00:26:58](#)):

So writing good alt text, it is critical. A lot of people are using artificial intelligence, but artificial intelligence is not there yet. Artificial intelligence is mimicking human beings basically, but it's not there because we need somebody to copy edit the alt text. We need to somebody to check it and the alt text

must be related to the context of the book. So imagine when you upload an image to the artificial intelligence, to an AI, it doesn't see the context of the image, it just see an image and describe the image. Is that enough? That's a business decision. But in my view, as I said, I'm not a lawyer and in my personal view and from the client I've been working with, the alt text should always relate to the context of the book. As long as you understand that and if the alt text, if you can give it to someone else, just read the alt text and that person can understand it or can sketch it in a piece of paper, then it's good alt text. So alt text is a subjective matter, but imagine somebody describing something. If you can perceive it in your mind, in your head or somebody else can sketch it and it's similar, then it's a good one. So that's all I would like to say about alt text because there's a lot of debate about alt text and which one is good, which one is bad. This is the way I look at it, there's lots of guidelines out there. I'm happy to share a few if you need at the end of the presentation.

([00:28:36](#)):

And accessibility and SEO, so basically SEO and accessibility, they go both hand in hand. Many accessibility practises such as using proper headings, it's accessibility, proper heading, provide alternative text to image, improve the website optimization. It'll help a lot. It'll enhance the metadata, it can improve the discoverability of your website, but your content, telling somebody this content has images or this content has images but without alternative text, or this content might have math equations, or this content is a musical notation and the musical notation does not have description. It'll help the reader to understand what is in this title or in this book. There's one issue that I'd like to address also, which is not listed here on the presentation, it's called language tag. Language tag is important when you're creating an accessible eBook. For example, if you have an eBook in English with some French text in it, ideally you need to make sure that every single sentence in French is written to say this sentence is French. The reason being is this, when you look at the assistive technology, it reads the content in English, but when it suddenly sees a sentence in English, in French, it will swap the language to say it in French. But there's few things, like you don't have to do names or like for example, the word deja vu, we still write it in English, it doesn't need to be written in French. Also you add tagging, language tag around it, but vice versa. If you have the book in French and you have some sentence in English, language tag is a must. It is important because assistive technology relies on this issue of the language tag. So the PDF and accessibility, that is something that's been going around and around and around for a long time.

([00:31:02](#)):

Is the PDF included under the EAA? The EAA did not mention the word PDF once or did not mention the word journal. No, they mentioned the word journals, but it mentioned the journal of the European Union, but it did not mention journal as we know journals that are published by publishing companies. It did not mention anything to do with PDFs. It just say that product should be, digital content should be perceivable, operable, understandable, and robust to comply with the accessibility requirement. So if you have a PDF, in my personal view, I just want to clarify that, that PDF, if you are going to put it out there, you should ensure that it is accessible. Recently, this is a really important change that happened in the last five months. Oh no, in April. So it's about eight months, seven months. In the United States, the Department of Justice in April, 2024 issued a ruling to say that, to expand the Americans with Disabilities Act article two to cover everything you see on the screen should be accessible and should be compliant with the Web Content Accessibility Guidelines 2.1 and level AA.

([00:32:25](#)):

So which means, if you have, your website should be accessible, your book should be accessible, your education material, your platform, your app, your student portal, all of this information should be accessible. That means your PDF should be accessible. So that means if you're providing also services from the EU to the US, that PDF or that journal or that research paper should be accessible. Just think about it, if someone with a disability decided to purchase a train ticket online, they will receive a PDF confirmation. If that PDF confirmation is not accessible to them, they are not meeting the requirement for

the European Accessibility Act. It's not perceivable, it's not operable, not understandable, and it's not robust because they cannot access their PDF. It doesn't work with their assistive technology. Therefore the ruling in the United States actually will help making sure that PDFs are fully accessible and compliant.

(00:33:29):

So the ruling mandates that Web Content Accessibility Guidelines 2.1 level A compliance for digital accessibility and it says that from April, the deadline is to comply with this ruling is April 2026 for any district, federal or state, that total population is over 50,000 people, and from April 2027 for smaller district with a population less than 50,000 people. So this is where I would like to talk mention about PDF because this is a burning sensation for everyone in digital accessibility and what they can do with their PDFs. So that's the ruling, which is a brief discussion here I mentioned about it, and this is the deadline for the Department of Justice, April 2026 and April 2027. So in conclusion, there's so many things that we can cover under the EAA. Basically any business currently who hasn't started taking the EAA seriously should start now because the deadline is fast approaching.

(00:34:53):

We have from, since 2019 we knew about it and since 2022, every country in the EU already introduced legislation to ensure their content is fully accessible by the deadline. We have grace period, which applies for the people who are showing good faith that they can make content accessible. So what I would like to conclude is simple that, I want to say that it is important to take action and make your digital accessibility as priority, top priority for your business if you want to work or provide service or content for the EU. Everybody can do it differently. Whether you have content, for example, eBooks, you can start assessing these books to see if it's accessible. If you have a website, you can start auditing your website and add an accessibility statement to your website to say my website is not accessible. We are planning to build a new website and we will ensure that website is accessible by X date. Or add a voluntary product accessibility template, which is basically it's an audit that display online to say where your website is failing and what you're doing about it and you are ensuring that website is fully accessible.

(00:36:23):

As I said, make audits, carry audit on your content, on your books, on your PDFs, on your platform, on your apps. Are they accessible? Make sure you hire people to make sure this content is accessible. Train your team on the accessibility standards, which really is vitally important. Start with one title, start with one journal, start with one HTML page and take a step forward. Step by step, you can make sure that all your content is accessible. By making accessibility a priority, we can make sure that everyone regarding their disability or ability can fully participate and benefit from making content accessible and increasingly be a digital society, benefit from our increasingly digital society. Thank you. And if you have any questions, I would be more than happy to answer them now.

Lukas (00:37:35):

Yeah, Bill, go ahead.

Bill (00:37:38):

Hi, I'm Bill Kasdorf, and hi Will.

Will (00:37:42):

Hi Bill. How are you doing?

Bill (00:37:43):

I know Will quite well and let me just say that, as you may know, I see lots of these presentations. This is the first one I've seen that you didn't say a single thing that I would dispute, right down the line. Exactly right. But my question is this, and I particularly appreciate your clarification on the PDF because so many people are puzzled by that. Here's a nuance that you may not be able to answer because you are not a lawyer and neither am I, but according to the EAA, is it that you can't sell that product? Let me frame it differently. Take a book that is available as a PDF and as an EPUB.

Will (00:38:34):
Okay.

Bill (00:38:35):
If you have an accessible EPUB, can you continue to sell that book in the EU even if the PDF is not accessible?

Will (00:38:45):
There's nothing mentioned about, the EAA is mainly for digital product.

Bill (00:38:51):
Right.

Will (00:38:51):
It does not mention anything about print product. If your print product is not sold online, you can carry on selling it.

Bill (00:39:01):
Yeah, of course you can still sell the print.

Will (00:39:02):
You can still sell the print. But if your EPUB is out there, that EPUB should be fully accessible and compliant with the EAA and with the Web Content Accessibility Guidelines.

Bill (00:39:15):
Yeah, but there are publishers that publish what they call e-PDFs that in effect are their eBooks, but they're PDFs instead of EPUBs. So those, if they're being sold in the EU, they should be accessible. They must be accessible, right?

Will (00:39:30):
They should be accessible, yes.

Bill (00:39:31):
Yeah, thank you.

Lukas (00:39:35):
Yeah, Sophy, go ahead.

Sophy (00:39:40):

Hi. In the scenario where you're only selling hard copies but you're making PDFs or EPUBs available for free on a website, are they required to be accessible?

Will (00:39:53):

You are providing service and product online, that product and service must be accessible. I give you an example, I mean Bill maybe can join also. We have open access. If I have my Open Access, it's a free book. It is a service. If that free book is not fully accessible, even if it is an Open Access, you cannot sell it. You should ensure that this book is fully accessible because you're providing a service.

Sophy (00:40:23):

So in that scenario, we would be back in compliance if we just remove the free PDFs from the website.

Will (00:40:31):

If you remove the PDF, you are compliant because you're selling the hard copy separately and it's not all.

Sophy (00:40:38):

Yeah, I mean it's a separate thing for us. I mean this is what I understood, but I just wanted to clarify. Thank you very much.

Will (00:40:44):

Thank you.

Guy (00:40:49):

I think your presentation was so clear Will that nobody has any questions. Oh no, Jessica.

Lukas (00:40:58):

Go ahead Jessica.

Jessica (00:40:59):

Yeah, so sorry, I was trying to find my audio buttons, sorry about that. Really excellent presentation. Thank you so much. I'm new to accessibility, so I'm learning lots of, it's very good to have this overview. I am thinking about this from a practical perspective. Are there any supportive tools or are there any checklists that I could use just to make sure that my digital content, my PDF is meeting minimal accessibility criteria?

Will (00:41:35):

I mean there are tools for PDF, there's tools for EPUB and there's tools for website. But for example, for PDF I usually use PAC 24 to test my content if it's fully accessible. For the EPUB, I use ACE by Daisy or SMART, but ACE by Daisy is also a tool developed by the W3C. And there's a lot of HTML tools to test a website if it's compliant or not. But all say that this is an automated tool. You still need sometimes a human being to test your website to see if you can access it correctly in different environments, whether it's Chrome, Firefox or iOS. So you still need the human interaction to make sure that your website, your content is accessible. But the following the tool I mentioned, they are all available for free. I'm happy to put them here, share them in the email once we finish the presentation.

Jessica (00:42:37):

Well that'd be great. There is quite a lot of how tools, you can do this for all texts. You can do that for, I don't know, the colour contrast checking and all of that. But I'm really looking for that checklist because I am nervous that I might have missed a lot.

Will (00:43:00):

I mean I'm happy to send you a checklist that we follow for PDF for EPUB and for the websites.

Jessica (00:43:05):

Oh, that would be amazing. Thank you. Thank you.

Guy (00:43:07):

Will, I had a question because it's something that I remember from a different conversation. I thought I remembered from an earlier presentation, at least my notes from an earlier presentation mentioned that there's a difference if you are delivering the service to a consumer versus if you are delivering it as business to business. Is that something that you have noticed as well or is that something that I completely misremembered from the earlier presentation that I followed?

Will (00:43:51):

To be honest, I haven't heard anything such whether it's business to business. Bill, do you have any answer on that Bill? Probably no. Also he's an expert in accessibility and publishing industry and he'd been in the field more than I have and he's based in the US. Bill, have you heard on such a thing? I dunno if Bill's still here.

Bill (00:44:14):

I think that that distinction is irrelevant, right? It's focused on the product or the service, not the party delivering the product or service. So if it's business to business but you're still selling, you're providing the service or you're selling the product, it has to be accessible. If it's business to business, business to consumer, consumer to consumer, all of those are covered by the EAA.

Guy (00:44:48):

Alright, I'll double check on that because I'm pretty sure it was mentioned in that as being a distinction and they may have gotten that wrong. So thank you.

Lukas (00:45:04):

There was a...

Bill (00:45:05):

A good example is title two. So a business to business. So for example, licencing a journal to a library. Yes, that's US of course, but that has to be accessible according to title two of the ADA. Even though you're not dealing with the end user in that transaction, that's absolutely still covered and it's similar with the EAA.

Will (00:45:39):

Lukas, did you have a question?

Lukas (00:45:41):

Yeah, there was a question in the chat about the consequences for non-compliance and it was from Michael Boudreau. He asked, are those consequences enforceable against companies that are based outside of the EU or outside of those countries?

Will (00:46:01):

Yes it is. Basically if you are providing a product or service to the EU market, even if you are outside the EU, that product or service must be compliant. And if it's not, then you have choice to pay a fine. And if it's an island, they might even sue you or they might issue an indictment or they might give you a fine. If you are in Germany, that product is going to German market, you'll have an order of cease and desist that means even if you are not part or based in the EU, even if you are in the US or in the UK because we are no longer in the EU. So if we trying to provide product or service to the EU and we're not compliant, it'll apply to us as well.

Lukas (00:46:51):

So what do you think is the next step Will? How will this impact as we go forward, the future of digital accessibility? What do you think will come next in this progression?

Will (00:47:10):

Look, I don't have the magic wand here to know what's going to happen next, but all I know is one thing is that the European Accessibility Act is coming into force on the 28th of June 2025. That's just over six months. What's going to happen on the 1st of July? It's anyones guess. Are the businesses going to panic and start trying to make sure all the content is accessible? I doubt that everybody can get all the content accessible by that date and so we only have to wait. But the thing is, we already knew about the EAA since 2019. Every country has its own legislation by now and we all have seen the consequences for non compliance and businesses should consider making that content accessible. From the frontlist, it should already been doing that for a long time. For backlist, they should already have workflow and action and plan and they should show that they have good faith, they are working on the accessibility. And in the US for example, I know a lot of businesses are trying to add VBA to their platforms. In the UK and the European market, they're adding accessibility statements and making sure that their content, their website should be accessible. They should get to that point. I hope I answered your question.

Lukas (00:48:47):

Yeah, I think it's hard to look into the future, but I think yeah, if you can be compliant now, that's setting yourself up very well for whatever comes next. There was another question here in the chat Will, specific to PDFs. So from Carlos, he says that the EAA requires services to be presented in fonts of adequate size and suitable shape, taking into account conditions of use and sufficient contrast, adjustable spacing between letters, lines and paragraphs, et cetera. So his question is, how could the PDF format conform to those font resizing and adjustable spacing requirements? Because as we know, the PDF is somewhat of a fixed format, so that's not really native to a PDF. How does that work?

Will (00:49:53):

Look, for PDF to work with assistive technology, you have few things that you need to decide. You need to build the reading order for the PDF, you need to make sure that alt text is provided for images. The colour contrast is there and the metadata is there. So I understand that it doesn't fit in one screen, but you will be able to manipulate the PDF but without losing the reading orders and all the accessibility is embedded in that PDF. I don't know anything else other than that that we currently do on the PDF, we are making sure that that PDF is compliant with the Web Content Accessibility Guidelines 2.1 level AA. It's accessible. The reading order is set up, the metadata is available, colour contrast is already checked and

any images have already alternative text unless it's decorative, whether it's a table, whether it is captured correctly, whether there's a link, it has a meaningful name for that link, not like "see more" or "see that," see more a few times. So all that information is there.

Lukas (00:51:12):

Bill, did you have something to add to that?

Bill (00:51:14):

Yeah, I just thought since this is so intimidating for most people and maybe even say discouraging, I'll put in an encouraging word which people may not realise, but Adobe has made tremendous strides in building these accessibility features into InDesign. And so many PDFs are created by InDesign that as of really just months ago, it's not a hundred percent there. There's still things that are being worked on but Will mentioned the metadata, that's actually built right into the current version of InDesign that you can actually hit a checklist of the accessibility metadata and it will put that into the EPUB that's generated from the InDesign. So in the past I've always said, oh my god, don't generate your EPUBs from InDesign, it's terrible, but it's actually getting better.

Lukas (00:52:19):

Thanks for that Bill. An uplifting word. So we did have a few more questions here. So Solene asked, what about video content? Are there specific requirements for videos?

Will (00:52:37):

Look, to make a video accessible, the minimum requirement, there should be a transcript for the video. There should be captions for that video. The colour contrast should be checked and if the video, you might be able to add audio description as well if there is a space on that to make it fully accessible. It's really difficult. I will say myself, I don't have a disability, but when I'm watching a video I like to have the caption display on the screen because it'll help me if I miss something or the accent I can't understand, at least I'm reading the text or if I'm watching a presentation, sometimes it's easier for me to download the transcript to read it. So ensuring that video is accessible is a key thing. What I'm finding nowadays, even if I am auditing a website, that website linking me to an external video outside the website, that link taking me to another website of the video and that video is not accessible. So there is additional material that we haven't thought about it. So video should be accessible, should have caption, the transcript, should be able to download the transcript and read it offline. And that's what I would do for the videos.

Lukas (00:54:04):

Sounds good. Yeah, I agree. I think it's more common these days, right? To see transcripts, but I think that's a good first step and I like to turn them on too. Another question from Ken. So Ken's asking, how do you think they are going to actually enforce and prove that something might not be accessible? Are they going to go looking for it or are they going to wait for complaints to come in from users?

Will (00:54:39):

There are two things. There is complaints from users and every country has built a commission for accessibility that they will be checking on content and on the website to make sure it's accessible. So if there's a complaint that will be investigated by this commission that's been set up by each of this country under the legislation and they will be enforcing that with a publisher.

Lukas (00:55:06):

Okay. Question from Katie. Would a map be considered an image? Because that's obviously a complicated thing to describe with alt text.

Will (00:55:19):

Sorry, I didn't hear that.

Lukas (00:55:21):

Is a map considered an image that you would need...

Will (00:55:26):

Of course map. Look, of course a map is an image and any image should be described unless it is decorative. Just think about it, if you close your eyes and I say map and that's it, it doesn't mean anything. But if you close your eyes and somebody described this is the map of Washington State and it's pointing to Seattle and showing where the location of Space Needle, for example, you can describe a map, everything can be described. The only thing, I'm sure Bill has seen that or I mentioned that before, the only one I struggled with was music notation. How would I describe music notation? There is a study group at the moment that they're dealing with this, they're trying to find a way how to describe the music and notation in books. But map is a key and it must be described.

Lukas (00:56:37):

Alright, good to know. So let's see, we've got one minute left. Do you still have a few minutes will to answer a few more questions? Yeah. Okay, cool. Let's see here. Sorry, scrolling through. Okay, so Esteban asks, are you aware of any tools that can transform accessible PDFs into an EPUB while maintaining those accessibility features? And do you think that is a good idea? Is that something, a best practise that you should or maybe should not do?

Will (00:57:22):

I haven't seen a tool that can take the InDesign and produce fully accessible EPUB. It might be able to have one or few things added to it. As Bill mentioned earlier on that Adobe has done few good things. You might be able to have the alternative text, but they don't have heading level for example in InDesign. So they have headers. So I don't think there is a tool that can produce, unless I'm wrong, I haven't seen one. Maybe there is one out there I'm not aware of. But all the work I have seen, there's no such a tool to go from InDesign to accessible EPUB at the moment. If anybody heard of any tool, I would love to hear about it and hopefully it'll be a good one too.

Guy (00:58:11):

This was actually specifically about PDFs that are already accessible. So not specifically something coming from InDesign. You actually have support for defining headings when exporting an EPUB from InDesign. But my follow-up question to you Esteban would be, if you already have accessible PDFs that pass the PAC checker and those kinds of things, what is the added value of creating an EPUB format for that? Is it because you want to give choices? What is the reason for creating an EPUB from that? So that's a question I would have if we were having a conversation around this.

Lukas (00:59:03):

And I would think however you would get to that accessible PDF, to create it, could you somehow use that method to produce that EPUB out of that method rather than converting your output format? Right?

Guy (00:59:22):

What Nandi, if you could, just out of curiosity, because I'm intrigued by your question. The question Nandi posts in the chat is, might be, under EAA, does alt text need to be visible or just machine readable? Because...

Will (00:59:38):

Okay, there's two things. In EPUB you have alt text which is compulsory, and if it's decorative you just say decorative equal presentation, the role for that one. And if you have a long description, you can put that in a separate tag and when you have a long description you will be able to set it up, add a paragraph, add a table, et cetera. In PDF, you only have one tag. The one tag says alternative text, you don't have long description, so you only have to rely on that. And from what I understand, there's a limit to how many characters you can put on the PDF. I think they said 999, whether that's correct or not, but that's why I heard that's the maximum. For the alt text in EPUB, there is a limit. I mean it's 365 characters, 300 or I think 300 or 250. Bill, you can confirm that or not. It's 365 characters in the alt text in the EPUB. The long description, it doesn't matter, but it'll be machine readable and if you want to display it in the e-reader, you can select in the e-reader setting to say, please display the alt text or the long description, or you can hide the long description. It shows at the end of the book or it depends how you capture it. You can flick between the long description and the short and the alt text as well.

Guy (01:01:10):

And for PDFs it's by default, it's not visible unless you hover over an image if you're talking about Acrobat. But that's also, a lot of the customers that we've worked with, they're cited. So if you've got an EPS or an Adobe Illustrator graphic, you cannot, if the image is transparent you don't see the alt text when you're hovering over it with your mouse. So then people come and ask us like, oh, the alt text didn't make it into the PDF, and then you're like, Nope, it's there. Machine readable. That's why you do your checks and make sure that it's all there.

Will (01:01:52):

Yeah,

Guy (01:01:57):

I think that's it, right, Lukas?

Lukas (01:02:02):

I just saw one more question here. What about a book cover? Is a book cover considered decorative or does that need alt text?

Will (01:02:14):

Well, it can be both. Okay. Some of the titles that I see, if the image has a meaning, it's good to describe the alternative text for the cover and the back cover and a matter of fact as well, because you might have the author image at the back cover as well. So the front cover and the back cover, they can be described. And if the publisher believes that this image, it doesn't add any value, you can leave it as a decorative image.

Guy (01:02:47):

As long as your title, which usually is the case. But as long as your title and subtitle are part of your metadata, because that is obviously very important. I can't hear you Lukas.

Lukas (01:03:06):

Can you hear me now?

Guy (01:03:07):

Yes.

Lukas (01:03:08):

Okay. Yeah, my AirPods just died. These things have terrible battery life. So yeah, I think that is all the questions. Quite a lively chat. There's some things that I think we'll have to come back to in the next webinar Guy. Ron had a question specific to InDesign, so maybe that's something we can follow up on.

Guy (01:03:37):

Yeah, that one I have that I started that conversation, but that's definitely something that we need to, the only thing, but I presume Ron would have been doing some research on that, but I don't remember the art tag coming out or what specific situation it comes out. So it might have something to do with object styles or things like that, but that's something Chad might even know more about. Anyway, I think it's time to thank Will.

Lukas (01:04:17):

Yeah, yeah. Thank you Will. And thanks Bill and everybody else for chiming in and asking questions and posting in the chat. Really appreciate it, Will. Thank you so much.

Will (01:04:31):

Thank you everyone. I really appreciate it. Thank you.

Lukas (01:04:35):

All right.

Guy (01:04:35):

Absolutely awesome.

Will (01:04:36):

Happy holiday everybody. Thank you.

Guy (01:04:38):

Happy Holiday.

Lukas (01:04:39):

Thank you Will. Thank you. You too. Have a great day everybody. Goodbye.