



**EUROPEAN UNION
OF THE DEAF**

A European Non-Governmental Organisation in official liaison with
European Parliament, European Commission and the Council of Europe

Report on the implementation of the Audiovisual Media Services Directive (AVMSD)

INTRODUCTION

As the only supranational organisation representing all deaf people before the European Union through a network of National Associations of the Deaf from 31 countries, the European Union of the Deaf (EUD) is issuing a report on the implementation of the Directive 2018/1808 of the European Parliament and of the Council of 14 November 2018¹, most commonly known as the Audiovisual Media Services Directive (AVMSD). This report is produced as part of the EUD series of reports on the implementation of accessibility legislation instruments. The other two reports analyse the implementation of the European Electronic Communications Code (EECC)² and the European Accessibility Act (EAA)³. The purpose of this report is to assess the effects of the implementation of the Audiovisual Media Services Directive (AVMSD) among the more than 1 million deaf people who are living in the European Union, Iceland, Norway, Switzerland and United Kingdom. In this report, we address the needs of deaf people, including those who use national sign languages (hereafter “deaf sign language users”). The report will identify the shortcomings of the AVMSD as well as provide recommendations to strengthen its obligations. This report is timely published as the European Commission is currently carrying out an evaluation of the AVMSD, accompanied where appropriate by proposals for its review, to be completed by 19 December 2026.

¹ Directive 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities, *OJL* 303, 28.11.2018, pp. 69-92.

² EUD, Report on the implementation of the European Electronic Communications Code, June 2025, available at: <https://eud.eu/euds-report-on-the-implementation-of-the-european-electronic-communications-code/>

³ EUD, Report on the implementation of the European Accessibility Act, June 2025, available at: <https://eud.eu/eud-publishes-new-report-on-the-implementation-of-the-european-accessibility-act/>

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European Commission's Citizens, Equality, Rights and Values (CERV) Programme.

Methodology

This report presents our analysis of legislation concerning the rights of deaf people, based on desk research and enriched with quantitative input gathered from the 31 National Associations of the Deaf: during a consultative workshop taking place in May 2024 to which representatives of 22 National Associations of the Deaf in the EU, Norway and United Kingdom participated⁴ and throughout our consultation on the legal frameworks in the 31 European countries on sign language rights⁵. We complement the information with several reports produced by the European Commission, the European Audiovisual Observatory, the European Broadcasting Union, and the European Regulators Group for Audiovisual Media Services. The latter is the European-level advisory body composed of national regulatory authorities (NRAs) responsible for the implementation of the AVMSD. In this report, we outline the main obligations set out in the Audiovisual and Media Services Directive (AVMSD) that are relevant to deaf people and refer briefly to the Digital Services Act (DSA) when addressing the online platforms' accessibility for deaf people.

Before analysing the AVMSD provisions applicable to deaf sign language users, we will first share a state of the play on the sign language accessibility in the media based on the findings from our consultation with the National Associations of the Deaf. Then we will clarify the context and the scope of the Directive, the definition of the access services that should be provided to deaf sign language users, the importance of accessibility action plans, and the significant role of the contact points for them.

SIGN LANGUAGE ACCESSIBILITY MEASURES: STATE OF THE PLAY

During a workshop we conducted with 22 representatives of our members, the National Associations of the Deaf (NADs), in May 2024, three questions have been asked regarding sign language provision in the audiovisual media services.

Daily news in national sign languages

The first question was “Are the daily news from the main public broadcast channel interpreted in your national sign language?”. 16 members responded “always”⁶, 3 responded

⁴ Austria, Belgium, Bulgaria, Croatia, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Luxembourg, Lithuania, Malta, Netherlands, Norway, Romania, Slovenia, Spain, Sweden, United Kingdom.

⁵ Bloxs, A. (Ed.). (2025). *From recognition to officialisation: A European evolution of sign language rights*. European Union of the Deaf (EUD). Available at: <https://eud.eu/wp-content/uploads/2025/12/From-recognition-to-officialisation.pdf>

⁶ Austria, Belgium, Bulgaria, Czech, Denmark, Finland, Germany, Greece, Ireland, Netherlands, Norway, Romania, Slovenia, Spain, Sweden, United Kingdom.

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“sometimes”⁷, and 3 responded “rarely”⁸. The answers to this question highlight the progress in ensuring accessibility of daily news in the national sign language with 16 respondents saying this is always the case. However, all channels should be made accessible to deaf people in the national sign language, the daily news should be the bare minimum in this regard. Furthermore, in our analysis on the legal frameworks regarding sign language rights, specifically on the provision in the audiovisual media, we noticed that 30 out of 31 countries, national laws and/or regulations contain provisions on the accessibility of the audiovisual media sector relating to National Sign Languages. However, despite the obligations in the Audiovisual Media Services (AVMS) Directive, transposed by all EU Member States and applied in Iceland and Norway, with Switzerland voluntarily incorporating some of its elements, most national frameworks still lack specific, enforceable requirements for access in National Sign Languages⁹. Additionally, the majority of countries that confirmed the provision of sign language in audiovisual media services specified that the service providers are public broadcasters.

This is further confirmed by the European Audiovisual Observatory report providing the list of sign language accessibility measures in EU Member States¹⁰: the countries where news is always provided with sign language interpretation, according to the NADs, are those where accessibility measures have been designed specifically to address the accessibility in sign language. This is either through the number and type of programmes (i.e. news, children programme, a.o.) or through a quota of broadcasting time (i.e. number of hours a week, minutes a day, or percentage of the transmission time). Unfortunately, the countries where the news are provided sometimes with sign language interpretation, according to the NADs, are those where there is no measurable target and/or quota, or where the option is given to audiovisual media service providers to provide either a quota in subtitling or in sign language. Countries where sign language interpretation is rarely provided are those that have not implemented any accessibility measures for the provision of sign language. This analysis confirms the importance of establishing mandatory and measurable sign language requirements to ensure consistent and equitable access for deaf viewers across the EU. Furthermore, the European Broadcasting Union's 2025 report on Access Services and Public Service Media reveals that 86% of the 36 public service media organisations that responded

⁷ France, Lithuania, Malta.

⁸ Croatia, Hungary, Luxembourg.

⁹ le Maire, D. (2025). Conclusion of Part II – Main findings on the national legal frameworks in 31 European countries regarding the recognition of National Sign Languages. In A. Bloxs (Ed.), *From recognition to officialisation: An European evolution of sign language rights*. European Union of the Deaf (EUD), p. 281.

¹⁰ European Audiovisual Observatory, IRIS Plus report on Accessibility of audiovisual content for persons with disabilities, 2023, pp. 71-76, available at: <https://rm.coe.int/iris-plus-2023-01en-accessibility-of-audiovisual-content-for-persons-w/1680ab1bdc> and European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, 2023, pp. 143-150, available at: <https://rm.coe.int/accessibility-measures-as-implemented-by-avms-providers-for-persons-wi/1680aefb42>

to their survey provide signed content for daily news programmes¹¹. However, this figure is likely much lower when considering the accessibility of daily news programmes in sign language on private broadcasters.

Other programmes in national sign languages

The second question we asked during the workshop was whether programmes in the national sign language are provided beyond news and emergency announcements. The responses revealed that 12 countries answered “yes”¹², 9 answered “no”¹³, and 1 country was unsure. Encouragingly, over half the respondents reported that such programmes do exist. However, it would be important to know how many additional programmes are actually offered in the national sign language. By contrast, 9 respondents stated that no other programmes are available in their national sign language, meaning that, at best, only the daily news might be accessible. This is further confirmed by the European Broadcasting Union’s report, although limited to the responses from 32 public service media organisations, according to which 72% of them provide state, government or parliamentary coverage in sign language; 69% provide children programme in sign language; 69% provide special/national events in sign language; 47% provide entertainment shows in sign language; and 39% provide documentaries in sign language¹⁴. This highlights the urgent need to ensure that deaf people have equal access to not only news but also to the full range of audiovisual content. Sign language provision must therefore be extended across all programme genres, including children’s programming, sports, culture, entertainment, films, and music, among others.

Way forward

To ensure effective accessibility in audiovisual media services, EUD recommends that national regulators establish specific, measurable targets for sign language interpretation and deaf-led sign language programmes. These should include clear quantitative goals, such as the percentage of audiovisual content required to include sign language, with progressive timelines following the entry into force of national transposition laws. Such targets should apply equally to both public and private broadcasters, as well as on-demand platforms. If the AVMSD revision includes them, these targets should also extend to video-sharing platforms, social media, news websites, and Very Large Online Platforms as regulated under Article 7 of the Digital Services Act. The targets must cover the full scope of programming, extending

¹¹ European Broadcasting Union, Report on Access Services and Public Service Media 2025, November 2025, public version, p. 26, available at:

https://www.ebu.ch/publications/research/members_only/report/msp-services-dacces

¹² Austria, Bulgaria, Denmark, Finland, France, Germany, Greece, Ireland, Norway, Spain, Sweden, United Kingdom.

¹³ Belgium, Croatia, Czech, Luxembourg, Lithuania, Malta, Netherlands, Romania, Slovenia.

¹⁴ European Broadcasting Union, *idem*, p. 26.



beyond news and emergency announcements to include children's programmes, cultural broadcasts, entertainment, sports, music, movies, documentaries, and more.

Equally important are qualitative indicators that ensure the interpretation provided is effectively accessible and beneficial to deaf viewers. This includes the use of qualified, native-level sign language interpreters and ensuring that the interpretation is clearly visible, unobstructed, and synchronised with the audiovisual content. Interpretation should also be compatible with personalisation tools, enabling adaptation for deafblind viewers or those with specific visual preferences. The same applies to deaf-led content produced in sign language that must be accessible to all deaf sign language users. Without firm attention to both quantity and quality across all programme genres, accessibility measures risk becoming symbolic rather than meaningful, ultimately failing to guarantee full and equal access for deaf persons.

EMERGENCY INFORMATION IN NATIONAL SIGN LANGUAGES: STATE OF THE PLAY

Disparities in emergency information in national sign languages

The third question we asked during the May 2024 workshop among 22 respondents from National Associations of the Deaf (NADs) focused on whether emergency announcements are interpreted on television in the national sign language(s) of each country. The results show a significant disparity in practices across Europe. In 8 countries¹⁵, respondents confirmed that emergency announcements are always interpreted in their national sign language, reflecting a strong commitment to accessibility. However, in 7 countries¹⁶, such announcements are only interpreted sometimes, and in 4 countries¹⁷, only rarely. Alarming, 3 countries¹⁸ reported that emergency announcements are never interpreted in the national sign language. These findings highlight a concerning inconsistency in the implementation of accessibility measures for emergency communication.

The results previously outlined are consistent with the existing national accessibility frameworks as outlined by the European Audiovisual Observatory¹⁹. For instance, Austria and Denmark demonstrate good practices by ensuring that the State covers any additional costs incurred to make emergency information accessible, thereby guaranteeing full accessibility for deaf people. In France, the Higher Audiovisual Council pays particular attention to the accessibility of health alert messages and significant current events. Ireland requires emergency information to be made available with subtitles and, where practicable, with Irish

¹⁵ Austria, Bulgaria, Germany, Luxembourg, Lithuania, Greece, Slovenia, Spain.

¹⁶ Czech, Finland, Hungary, Ireland, Norway, United Kingdom, Belgium.

¹⁷ Croatia, Denmark, Netherlands, Sweden.

¹⁸ France, Malta, Romania.

¹⁹ European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, 2023, pp. 25-26, available at: <https://rm.coe.int/accessibility-measures-as-implemented-by-avms-providers-for-persons-wi/1680aefb42>

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Sign Language interpretation. In Belgium, a predefined amount of free emergency broadcasting time is allocated, indicating that once this quota is exhausted, the obligation ceases. Moreover, according to the European Broadcasting Union's report, only 5 public service media organisations foresee prerecorded signed messages in case of emergency²⁰. However, through our analysis on the legal framework of sign language legislation, we noticed that only a small number of countries have introduced explicit obligations ensuring the accessibility of emergency broadcasts in sign language: the Netherlands, Greece, Hungary (specifically for public service announcements), Iceland, and Spain²¹. Specifically, the Netherlands provides a good example practice where the law recognising the Dutch Sign Language requires, in its Article 4, spoken announcements in crisis or emergency situations to be, as far as possible, immediately interpreted into Dutch Sign Language²². However, in most of the EU countries, the provision of accessible emergency information is left to the discretion of the audiovisual media service provider or is framed in vague terms such as "to the best of their ability," with no clear details on funding responsibilities or the nature of the accessibility measures.

COVID-19: a case study

This lack of consistency and clarity creates significant gaps in the protection of deaf communities during crises. It is essential that all elements of emergency and public information, such as tone, urgency, and context, are conveyed accurately and comprehensibly in sign language. This level of communication can only be guaranteed through interpretation delivered by qualified sign language interpreters. The EUD noted that all EU Member States, as well as Iceland, Norway, Switzerland, and the UK, eventually began to provide live sign language interpretation during press conferences and official briefings during the COVID-19 crisis²³. However, this access was typically achieved only after consistent advocacy by deaf people and National Associations of the Deaf (NADs), rather than being proactively implemented by authorities.

Despite the obligations outlined in Article 7(5) of the AVMSD and the Articles 9 and 21 of the UNCRPD, the availability and consistency of accessible public information in sign language remain insufficient. The EUD has documented that many deaf people fear the improvements made during the pandemic will not be sustained now that the emergency phase has ended²⁴.

²⁰ European Broadcasting Union, *idem*, p. 21.

²¹ le Maire, D. (2025), *idem*, pp. 281-282.

²² Wet erkenning Nederlandse Gebarentaal, *Staatsblad* 2021, nr. 248, afl. 1 juli 2021, available at:

<https://wetten.overheid.nl/BWBR0045012/2021-07-01>

²³ <https://eud.eu/policy/covid-19/>

²⁴ Balčiūnaitė M. and Wheatley M., The impact of the COVID-19 pandemic on the rights of deaf persons in Europe, *EUD Book on UNCRPD Implementation in Europe – A Deaf Perspective. Article 9: Access to information and communication*, 2022, pp. 66-77, available at: https://eud.eu/wp-content/uploads/2022/02/UNCRPD_Book_V3.pdf

It has been confirmed through several instances of lack of accessible information in national sign language after crises occurred in some countries. This underscores the pressing need to move from ad hoc or crisis-driven accessibility practices to a systemic, permanent approach. Ensuring the presence of sign language interpretation, particularly for announcements that carry emotional weight or urgency, is not a courtesy but a right grounded in international human rights law.

Way forward

Therefore, we strongly recommend that the AVMSD be amended to introduce clear and binding obligations for all Member States to provide emergency information in all accessible formats, and especially in national sign languages, without exception. Furthermore, specific funding mechanisms should be foreseen to cover the cost of providing such services, and detailed technical standards should be developed to ensure quality and uniformity across Europe.

CONTEXT OF THE DIRECTIVE

Timeline

The initial Audiovisual Media Services Directive adopted in 2010²⁵ was revised in November 2018 with strengthened obligations. The revised AVMSD then entered into force in December 2018. EU Member States were required to transpose the Directive into their national legislation by 19 September 2020 (Art. 2). However, a significant amount of Member States delayed the transposition as communicated by the European Commission in September 2021²⁶ and some failed to transpose the Directive as referred by the European Commission in May 2022²⁷. It caused major delays in the implementation of the Directive. Consequently, the reporting of the European Commission on its application as required under Article 7.2 of the AVMSD²⁸ has been equally delayed.

²⁵ Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services, *OJL* 95, 15.4.2010, p. 1-24.

²⁶ Czechia, Estonia, Ireland, Spain, Croatia, Italy, Cyprus, Slovenia and Slovakia. <https://digital-strategy.ec.europa.eu/en/news/audiovisual-media-commission-calls-member-states-fully-transpose-eu-rules-audiovisual-content>

²⁷ Czechia, Ireland, Romania, Slovakia and Spain. <https://digital-strategy.ec.europa.eu/en/news/audiovisual-media-services-directive-commission-refers-five-member-states-court-justice-eu>

²⁸ Commission Staff Working Document Reporting on the application of Directive 2010/13/EU “Audiovisual Media Services Directive” as amended by Directive (EU) 2018/1808, for the period 2019-2022, 5.1.2024, p. 18, available at: <https://digital-strategy.ec.europa.eu/en/library/commission-report-application-audiovisual-media-services-directive>

Purpose of the Directive

The AVMSD establishes legal obligations on audiovisual media services in the Member States, benefiting a significant number of persons, among whom deaf people who use national sign languages, in their access to information shared through those services.

The AVMSD is a Directive setting out minimum requirements that must be followed by EU Member States. Yet, Member States may impose stronger obligations and expand the scope of the obligations to other areas.

Concretely the AVMSD establishes only a general minimum requirement under Article 7, calling on media service providers to make their services accessible in a progressive and continuous manner. However, because this obligation is neither precisely defined nor supported by measurable targets, its implementation has not led to effective harmonisation across EU Member States. Instead, countries interpret and apply the requirement differently, resulting in uneven accessibility measures throughout the European Union.

Each country interprets the requirements in its own way, resulting in significant differences in the types of obligations. In some cases, these obligations are qualitative (i.e. a general obligation to promote accessibility), while others are quantitative (i.e. specific quotas for sign language interpretation). The scope of the obligations also depends on the type of provider (such as public service broadcasters, private broadcasters, commercial providers) and on the type of service whether their services are provided through television channels or, for example, through on-demand platforms. In addition, obligations may vary depending on the type of programme with distinctions made, for example, between pre-recorded content, live broadcasts, news, and non-news programming.

The AVMSD does not only impose obligations on the accessibility but also establishes the protection of minors, some rules on the commercial information on TV programs, and the prohibition of hate speech and discrimination based on some grounds such as disability, among others. While those provisions are equally important, this Report will focus on the accessibility of the audiovisual media services for deaf sign language users, and specifically on the application of Article 7 of the revised AVMSD as follows.

SCOPE OF THE DIRECTIVE

Persons with disabilities including deaf sign language users (Recital 22):

The AVMSD establishes an obligation on the audiovisual media services providers to ensure the accessibility of audiovisual content for persons with disabilities, in particular “with a visual or hearing impairment” (Recital 22). While the terminology is not in line with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the AVMSD

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addresses the right of “persons with a disability” to participate and be integrated in the social and cultural life of the European Union. Yet, it refers to the importance of ensuring accessibility of audiovisual media services for deaf persons through sign language and subtitling, among other accessibility features (Recital 46).

Audiovisual media services (Art. 1):

The scope of application of the AVMSD is limited to audiovisual media services. Under Article 1 (a) of the AVMSD, audiovisual media service means a service whose principal purpose or a dissociable section thereof is devoted to providing programmes, under the editorial responsibility of a media service provider, to the general public, in order to inform, entertain or educate, through television broadcast (i.e. BBC, France Televisions, ZDF, RAI, a.o.) or on-demand platform (i.e. BBC iPlayer, ARTE.tv, ZDFmediathek, RAIPlay, Netflix, etc). Under the AVMSD, programmes broadcasted through television are called linear services and those through an on-demand platform are called non-linear services. Both linear and non-linear services are required, by Article 7 of the AVMSD, to progressively and continuously become accessible to persons with disabilities, through different accessibility measures.

The AVMSD mentions also video-sharing platforms (i.e. YouTube, Vimeo, TikTok). Those services are used to provide programmes and/or user-generated videos to the general public but for which the video-sharing platform provider does not have editorial responsibility, in order to inform, entertain or educate (Art. 1 (aa)). However, only some rules of the AVMSD apply to them and they fall out of the scope of Article 7 of the AVMSD. Therefore, the providers of those platforms are left with appreciation on whether they have to comply with the accessibility requirements to the detriment of persons with disabilities, including deaf sign language users. However, the Digital Services Act (DSA) provided a specific obligation on the Very Large Online Platforms to assess the risks that their services pose to the accessibility for persons with disabilities (Art. 14(3)(g)). In the past year, streaming platforms, led by YouTube as the largest, have overtaken traditional broadcast and cable television in terms of total watch time on TV screens. This significant shift in viewing habits highlights the crucial need to include any form and size of video-sharing/online platforms within the accessibility obligations of the AVMSD and to strengthen the current obligations of the DSA. The same applies to other formats such as social media platforms, video gaming platforms, and audiovisual sections of news websites, which should also meet accessibility requirements. However, while newspaper websites remain outside the scope of the Directive, standalone audiovisual content that is unrelated to the text may be considered a video-sharing platform and fall under the scope of the AVMSD. As the Directive does not impose accessibility requirements on video-sharing platforms, such content is not mandated to be accessible²⁹. This issue is highlighted in the

²⁹ EDF Toolkit for transposition on the Audiovisual Media Services Directive, November 2019, p. 30, available at: https://www.edf-feph.org/content/uploads/2020/12/final_edf_avmsd_toolkit_november_2019_0.pdf



2025 Concluding Observations of the UN Committee on the Rights of Persons with Disabilities (CRPD Committee), which states that the AVMSD 'does not ensure accessibility of video-sharing platforms, social media, and the audiovisual sections of news websites'³⁰. The EUD strongly commends the platforms that undertook positive steps towards accessibility of their content for deaf people, by encouraging video and content creators to use accessibility features and encourages any platforms to take example and progressively contribute to accessibility for everyone.

Furthermore, the AVMSD does not apply to features or services that allow viewers to access audiovisual media services. Those features are defined by the European Accessibility Act as services used to identify, select, receive information on and view content (EAA Art. 3 par. 6). Examples of such tools are websites, online applications, or Electronic Programme Guides (EPGs). They fall under the scope of the European Accessibility Act, which requires providers to inform end-users whether access services (i.e. subtitles and sign language interpretation) are available for the audiovisual media content they intend to view. The EAA therefore regulates the access environment, not the accessibility of the audiovisual media services content itself. Rendering the content accessible lies within the scope of the AVMSD, which requires broadcasters and on-demand services to provide accessible content through access services (such as subtitles and sign language interpretation). Therefore, both the EAA and the AVMSD complement each other: the AVMSD guarantees that content is accessible with access services, while the EAA ensures that viewers are informed about and can use those access services. Both legal instruments are closely intertwined, and both must be effectively implemented to achieve real accessibility. It serves little purpose to make a television programme accessible under the AVMSD if, under the EAA, viewers are not informed that access services are available or are unable to activate them, for example, through their Electronic Programme Guide.

For example, ARTE is a Franco-German on-demand service provided by a public broadcaster. Under the AVMSD, as implemented in French national legislation, ARTE is required to make its content accessible, for instance by providing subtitles. In addition, the European Accessibility Act obliges ARTE to ensure that information about this accessible content, and the ability to access it from any device or platform, is itself accessible to deaf sign language users.

However, it is important to highlight that the European Accessibility Act (EAA) missed a crucial opportunity to strengthen the obligations under the Audiovisual Media Services Directive (AVMSD). Notably, several amendments proposed in the opinion of the European Parliament's Committee on Employment and Social Affairs (EMPL), under the rapporteurship of MEP Ádám Kósa, sought to address this gap. For example, Amendment 41 proposed that at least 75% of overall programming should include subtitles for the deaf and hard of hearing (SDH) and 5%

³⁰ CRPD Committee, Concluding Observations to the EU, CRPD/C/EU/CO/2-3, 2025, par. 53(b).

should include sign language interpretation³¹. Amendment 82 addressed quality standards for sign language, requiring that interpretation to be accurate and comprehensible, with professional standards for interpreters and user control over how signing is displayed, where technically possible³². While these proposals were not fully integrated, they influenced the adopted amendment that introduced the concept of "access services" into the EAA³³. The final text requires that services helping users to find, choose, and watch TV or video content are supporting access services (such as subtitles and sign language interpretation), allowing users to activate these features at the same level of prominence as primary media controls. However, these provisions only ensure that the navigation interface is accessible, not the quality or availability of the access services themselves. This represents a missed opportunity for the EU to establish a unified standard on audiovisual accessibility, including consistent provision and quality of subtitles and sign language interpretation. For deaf users, ensuring that platforms are navigable is not sufficient if the content itself remains inaccessible or if the access services are of poor quality.

Accessibility obligations (Art. 7):

Even though the AVMSD is known for establishing accessibility obligations on the audiovisual media service providers to render their services accessible to persons with disabilities, it fails to specify what accessibility measures are required or how they should be implemented. In contrast to the EECC and the EAA, it does not provide functional accessibility requirements (as found in Annex I of the EAA) nor references to technical specifications (as referred to by the EECC). And there is no legal basis for the development of standards or for the adoption of implementing acts.

The AVMSD simply sets out a general obligation for Member States to ensure, without undue delay, that audiovisual media service providers are made continuously and progressively more accessible to persons with disabilities through proportionate measures (Art. 7). While the use of the terms "continuously and progressively" is commendable in that it ensures accessibility

³¹ Amendments to the Opinion of the Committee on Employment and Social Affairs on the proposal for a directive of the European Parliament and of the Council on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services, 2015/0278 (COD), 6.4.2017, available at:

https://www.europarl.europa.eu/doceo/document/EMPL-AD-594023_EN.pdf

³² Amendments to the Opinion of the Committee on Employment and Social Affairs on the proposal for a directive of the European Parliament and of the Council on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services, *idem*.

³³ Amendments adopted by the European Parliament on 14 September 2017 on the proposal for a directive of the European Parliament and of the Council on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services, 2015/0278 (COD), 14.09.2017, available at:

https://www.europarl.europa.eu/doceo/document/TA-8-2017-0347_EN.html

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under the AVMSD is maintained, and even strengthened, over time, the concept remains vague. It lacks mechanisms to accurately track progress and does not include any concrete targets or minimum accessibility requirements to be achieved.

Furthermore, the use of “proportionate measures” leads to high disparity in the interpretation and application of such measures as identified by the European Regulators Group for Audiovisual Media Services (ERGA); “these ‘proportionate’ measures differ at least slightly from country to country. They differ regarding which providers, services and programmes that the obligations apply to. They also differ when it comes to the different obligations themselves (i.e. techniques, quantity, quality, etc.)³⁴”. The AVMSD does not provide guidance on how to determine whether a measure is proportionate or not for a specific provider. The interpretation is made at the national level and can be based on the financial and technical resources, the difference between public service broadcasters and private ones, the timeline, the costs and the justifications.

Moreover, the AVMSD also gives some flexibility to the audiovisual media service providers by taking into account the practical and unavoidable constraints that could prevent full accessibility, such as programmes or events broadcast in real time (Recital 22). This provision gives room for appreciation and discretion in implementation, allowing Member States and providers to balance accessibility goals with technical and operational limitations, though such exceptions should remain exceptional and not undermine the overarching objective

Considering those gaps in the AVMSD, the UN Committee on the Rights of Persons with Disabilities (CRPD Committee) shared its concerns in its 2025 Concluding Observations that the AVMSD “lacks timeline and targets for implementation (...)”³⁵. It recommended the EU to set timelines and harmonised EU-wide criteria, including qualitative and quantitative targets, to make audiovisual content accessible to persons with disabilities, including deaf sign language users.

Moreover, the AVMSD obliges Member States to ensure that emergency information, including public communications and announcements in situations such as natural disasters, when made available through audiovisual media services, is accessible to persons with disabilities (Article 7(5)). However, the Directive also introduces a degree of flexibility, similar to the general obligation on accessibility: Recital 24 allows that, in exceptional cases, emergency information might not be accessible to persons with disabilities. It is important to note that the AVMSD does not explicitly define “emergency information”, thus granting Member States discretion in interpreting and applying this provision. In line with Article 11 of

³⁴ European Regulators Group for Audiovisual Media Services, Report on New rules on accessibility (Article 7.1) – A common understanding of ‘proportionate measures’, 2021, p. 23, available at: <https://erga-online.eu/wp-content/uploads/2021/12/ERGA-SG1-2021-Report-Article-7-accessibility.pdf>

³⁵ CRPD Committee, Concluding Observations to the EU, CRPD/C/EU/CO/2-3, 2025, par. 53(b).

the UNCRPD, which requires States Parties to take all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including humanitarian emergencies, we strongly recommend that the AVMSD be revised to provide a clear definition and scope of "emergency information". It should also require Member States to ensure full accessibility without exceptions, given the vital nature of such information for public safety and the need to guarantee equal access to timely, life-saving content for deaf sign language users.

Although the scope of the AVMSD is somewhat limited when it comes to non-linear audiovisual media services, such as online platforms, video on demand, and social media, it is the responsibility of these providers to contribute to accessibility for persons with disabilities, particularly for deaf people and sign language users. This commitment is in line with Article 21 of the UNCRPD, which affirms the obligation of states to ensure equal access to information and communication for persons with disabilities. As service providers, online platforms must uphold their duty to offer accessible services to all individuals, reflecting their responsibility to ensure inclusion and accessibility for people with disabilities.

ACCESS SERVICES FOR DEAF PEOPLE:

The means to achieve the accessibility of audiovisual media services (in other words, "access services" as defined by the EAA) include, but need not be limited to, sign language, subtitling for deaf and hard of hearing people, spoken subtitles, and audio description (Recital 23). For deaf people, both sign language and subtitles are of utmost importance for their access to AVMS.

Subtitles:

Subtitles are essential for some deaf people, as they provide access to audiovisual content that may otherwise be inaccessible, who prefer written text or wish to read subtitles alongside sign language interpretation. Reports from the European Commission, the European Regulators Group for Audiovisual Media Services (ERGA), and the European Audiovisual Observatory all show a clear trend: the provision of subtitles has steadily increased over time. Thanks to advancements in technologies such as artificial intelligence, subtitling can now be applied to the vast majority of content across both linear and non-linear services. Hence our recommendation to establish an ambitious, binding target for subtitling provision by both public and private linear broadcasters and non-linear media services, as well as by video-sharing platforms.

However, one significant concern remains: the quality of subtitling. Indeed, captions must be accurate, meaning they reflect the spoken content without errors or omissions. They should be consistent in style and formatting across all programmes to support viewer comprehension

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and familiarity. Captions must also be clear, offering a complete textual representation of the audio, including speaker identification and relevant non-speech information such as sound effects, music cues, or emotional tones. They must be readable, which means they should appear on screen long enough to be fully read, be synchronised with the audio, and remain visually unobtrusive, thus avoiding overlap with important visual elements. Above all, captions must ensure equal access, preserving the full meaning and intent of the original material so that deaf viewers receive the same experience as hearing audiences³⁶. In this perspective, we call for the development and/or revision of a European standard on subtitle quality and formatting. The AVMSD should explicitly refer to such a standard that outlines specific requirements for subtitles for deaf and hard of hearing people. It would provide much-needed clarity and consistency across Member States, ensuring that subtitles are not only present but also meet quality criteria that reflect the needs of deaf viewers.

However, many deaf people are sign language users, with sign language as their first and preferred language for accessing information. For these individuals, access to audiovisual content in sign language is essential to ensure full comprehension and to enable them to benefit on an equal footing with hearing viewers. Subtitles alone may not provide the same level of understanding or cultural relevance. Despite this, sign language interpretation remains rarely provided across both linear and non-linear audiovisual media services, meaning that deaf sign language users continue to face significant barriers to equal access under the current implementation of the AVMSD. This is why this report will focus primarily on the provision of sign language interpretation in audiovisual media services.

Before addressing the access services in sign language, it is important to emphasise that deaf people must be provided with full access options when engaging with audiovisual media services, this includes the ability to choose between written subtitles, sign language interpretation, or a combination of both, depending on their individual preferences and linguistic needs.

Sign language:

Recital 23 refers to sign language as one of the means to achieve accessibility in the audiovisual media services. In the implementation of the AVMSD, one may notice that most of the EU Member States provide sign language interpretation as fulfilling the obligations of Article 7 for deaf people. However, this is not sufficient as further explained in this part: not only should sign language interpretation of existing broadcast programmes but also deaf-led programmes in sign languages should be provided.

³⁶ EUD, Position Paper on Accessibility of Information and Communication, 2022, p. 6, available at: <https://www.eud.eu/wp-content/uploads/2022/03/EUD-Position-Paper-Accessibility-of-Information-and-Communication.pdf>

Sign language interpretation:

Sign language interpretation, in the context of audiovisual media services, refers to the provision of high-quality interpretation delivered by qualified and professional sign language interpreters who are proficient in the national sign language of the country where the service is broadcast or made available. These interpreters must be capable of rendering spoken content in a clear, accurate, and culturally appropriate manner, ensuring full comprehension for deaf viewers.

Moreover, the provision of sign language interpretation can take place in different ways. The use of sign language in-vision, either as integrated (full-frame) or picture-in-picture interpretation, allows deaf viewers to follow sign language alongside the original audiovisual content. This is effective as long as it meets essential requirements for visibility (including the size of the interpreter), contrast, and clear separation from other visual information on the screen. While traditional in-vision interpretation remains underused, especially outside of news and public announcements, new technologies are expanding the possibilities.

For example, the SignUp Chrome extension enables the display of sign language subtitles, where pre-recorded sign language translations are synchronised with online video content. These solutions offer greater flexibility, especially for on-demand platforms, and empower users to activate or personalise their access according to their preferred sign language.

Moreover, the use of AI technologies for sign language interpretation in audiovisual media services (AVMS) raises significant concerns. While AI-driven solutions such as avatars for sign language are still in their developmental stages, they are not yet capable of delivering accurate, context-sensitive, or culturally appropriate interpretations. As highlighted in the European Broadcasting Union report, issues such as the lack of standardized datasets, limited vocabulary, and inaccurate representation of facial expressions and body posture create barriers to effective communication for deaf communities³⁷. Moreover, the EUD's report on AI emphasizes the risks of relying on such technology, which may not only fail to meet the accessibility needs of sign language users but also undermine their linguistic and cultural rights³⁸. Deaf communities often reject AI avatars, as they cannot adequately convey the nuances of sign language, leading to a potential loss of meaningful communication and access. Such technologies should, therefore, be used cautiously, ensuring that they complement, rather than replace, human interpretation services.

To ensure consistency and accessibility across platforms, we recommend the development

³⁷ European Broadcasting Union, *idem*, p. 30.

³⁸ Prof. Dr Filipe Venade de Sousa. (2025). *Sign language in the era of artificial intelligence*. European Union of the Deaf (EUD). Available at: <https://eud.eu/wp-content/uploads/2025/07/Sign-Language-in-the-Era-of-Artificial-Intelligence.pdf>

and publication of technical specifications or standards on the display of sign language, notably by referring to the standard that is under development at the time of the publication of this report: ISO/IEC CD 20071-24 (Information technology — User interface component accessibility — Part 24: Visual presentation of audio information in sign languages)³⁹.

However, sign language interpretation is not sufficient as it does not provide full equivalency to deaf people in their access to audiovisual media service on an equal step with people who are watching content in their spoken first language. Sign language access in audiovisual media should not be limited to interpretation alone, on the contrary, the provision of sign language interpretation should be seen as a complementary way to render existing content accessible in sign language, when it is appropriate.

Sign language provision:

Achieving full realisation of Article 30 of the UNCRPD for deaf people in terms of access to audiovisual media services can only happen through the production and provision of programmes originally produced in sign language, featuring deaf news anchors, journalists, and content creators who are native sign language users and who present content directly in sign language. This approach ensures that the content is delivered directly in their mother tongue, their national sign language, by deaf presenters and professionals in a culturally appropriate way. It avoids the need for interpretation, which can sometimes be too fast or not fully accurate and may miss important cultural aspects that are vital for full understanding in Deaf communities. Research consistently confirms that this form of access is more effective, linguistically appropriate, and culturally inclusive.

Firstly, foundational research by De Meulder and Heyerick (2013) demonstrated that sign language interpretation alone is often insufficient for many deaf viewers⁴⁰. They emphasised the importance of involving deaf professionals directly in the creation and presentation of content, which not only enhances comprehension but also supports linguistic identity, cultural ownership, and employment within the deaf community. Their work showed that deaf viewers identify more strongly with news delivered in sign language by deaf presenters than with interpreted content, and that this format better reflects the communicative norms and values of deaf communities.

Building on this, Dhoest and Rijckaert (2021) explored the issue of comprehensibility in TV

³⁹ <https://www.iso.org/standard/88446.html>

⁴⁰ De Meulder M. and Heyerick I., “(Deaf) Interpreters on television: challenging power and responsibility”, in Meurant L. et al, *Sign Language Research, Uses and Practices*, 2013, available at: https://www.degruyterbrill.com/document/doi/10.1515/9781614511472.111/html?srsId=AfmBOOpLIZ4-u9OKV9weVYnMlOZB_ss8n4iKwxwsYUgh8Y2XOPsVbUZ7

news interpreted into Flemish Sign Language in the Flemish context in Belgium⁴¹. Through interviews with deaf viewers and an experimental test broadcast, they found that many viewers struggled to understand news delivered via hearing interpreters, citing issues such as speed, fluency, and the overload of simultaneous visual elements. The study concluded that summarised news presented in sign language by deaf news anchors resulted in significantly better comprehension and engagement. It recommended producing news “in sign language” rather than merely “with sign language”, stressing the need for formats that reflect the information needs and visual communication preferences of deaf viewers.

Finally, the EU-funded Deaf Journalism Europe (DJE) project research report, published on 29 January 2025, gathered responses from 877 Deaf participants across six countries (Belgium, France, Germany, the Netherlands, Slovakia, and Sweden)⁴². The findings clearly showed that a majority of deaf people prefer news presented directly in sign language by deaf news anchors, with strong support for the development of deaf-led news services. The study also underscored the dominant role of digital platforms in news consumption among deaf people. Moreover, providing deaf-led news services (with deaf news anchors and deaf journalists) ensures that the selected information is culturally sensitive and relevant to the deaf community. These results support the need for public broadcasters and governments to invest in sustainable, culturally appropriate sign language media services.

A few good practice examples of deaf-presented programmes in national sign languages are listed on this webpage⁴³. Unfortunately, the number of countries where deaf-presented programmes are provided is very limited compared to the number of countries where programmes are interpreted into sign language⁴⁴. Indeed, the European Broadcasting Union’s report specified that out of 36 public service media organisations responding to their survey, only 44% provide regular current affairs programmes designed for deaf people⁴⁵.

We strongly encourage all AVMS providers, in the broadest sense—not limited to those covered by the AVMSD and Digital Services Act (DSA)—to collaborate with National Associations of the Deaf (NADs). This collaboration should focus on investing in the

⁴¹ Rijckaert J. and Dhoest J., Analysis of the comprehension of sign language interpreters in Flemish television news broadcasts: An illusion of inclusion?, *EUD Book on UNCRPD Implementation in Europe – A Deaf Perspective. Article 9: Access to information and communication*, 2022, pp. 196-211, available at: https://eud.eu/wp-content/uploads/2022/02/UNCRPD_Book_V3.pdf

⁴² Deaf Journalism Europe, *Survey report about the role of deaf consumers in deaf-led businesses*, 2025, available at: <https://www.deafjournalism.eu/our-study-shows-deaf-people-want-more-news-in-sign-languages/>

⁴³ https://europe2022.signlangtv.org/results.php?feature_value=sl_source%2Fdeaf_presented. Some deaf-led programmes have emerged in other EU countries since 2022 such as L’hebdo signé in Belgium (French speaking community): <https://www.telesambre.be/emission/lhebdo-signe>

⁴⁴ https://europe2022.signlangtv.org/results.php?feature_value=sl_source%2Finterpreted

⁴⁵ European Broadcasting Union, *idem*, p. 26.



development of Deaf-led programmes and the hiring of Deaf journalists, news anchors, and sign language experts. By doing so, these platforms can ensure the creation of high-quality, accessible content that accurately reflects the perspectives and needs of the Deaf community. Supporting Deaf talent not only promotes inclusivity but also enhances the provision of relevant and engaging programming, ultimately benefiting both Deaf and hearing audiences alike.

Expanding the scope beyond linear services

Furthermore, sign language provision should not be limited to news broadcasted by linear services, but must be provided across all programme genres, including children's programming, sports, culture, entertainment, music, and more. The same applies to non-linear services, where content including films and series, like those offered on platforms such as Movistar⁴⁶, HBOMax⁴⁷, Disney+⁴⁸ and Netflix producing deaf-led movies⁴⁹, should also be provided in sign language and/or made accessible through sign language interpretation. Only by integrating sign language consistently across linear (both from public and from private broadcasters) and non-linear services can deaf sign language users benefit equally from the audiovisual media landscape.

Definitions of access services for deaf sign language users

In conclusion, based on the issues identified in previous sections of this report, we recommend that the AVMSD incorporate clear definitions for various access services, such as written subtitles, sign language subtitles, sign language interpretation, sign language presentation, and sign language programmes. Additionally, we urge the establishment of specific quality and adequacy standards for each service, in alignment with the broader accessibility obligations. This approach would promote greater legal clarity, ensure consistency across Member States, and facilitate effective monitoring of the accessibility of these services for Deaf viewers.

ACCESSIBILITY ACTION PLANS

According to Article 7 (3), Member States shall encourage audiovisual media service providers to develop accessibility action plans in respect of continuously and progressively making their services more accessible to persons with disabilities. Since this provision does not put any obligation on the Member States to enforce audiovisual media service providers to develop

⁴⁶ <https://www.movistarplus.es/cine/lse-peliculas-subtituladas-con-interprete>

⁴⁷ <https://www.hbo.com/movies/a-z> (type "ASL" to find movies with sign language interpretation).

⁴⁸ <https://whatsondisneyplus.com/new-chrome-extension-signup-offers-asl-captions-on-selected-disney-films/>

⁴⁹ <https://www.netflix.com/be-en/title/81035566>

and publish accessibility action plans, there is a disparity between the Member States: between 2019 and 2022 (reporting period) only 10 Member States have reported that accessibility action plans have been developed by audiovisual media service⁵⁰ providers during the reporting period (2019-2022), and several other Member States explained that action plans have not yet been reported due to the late transposition of the revised AVMSD .⁵¹ in the national legislation, accessibility action plans are mandatory in 18 out of 28 Member States assessed . And only five Member States require actions plans be developed in consultation with ⁵² of persons with disabilities . This has serious consequences on the accessibility of audiovisual media services for deaf sign language users.

Indeed, the countries where audiovisual media service providers and/or National Regulatory Authorities, responsible for the implementation of the AVMSD, are in consultation with organisations representing deaf communities, including our members, the National Associations of the Deaf, demonstrate better accessibility of audiovisual media services for deaf sign language users as follows:

- In Ireland, RTÉ, an Irish public broadcaster, engages with the deaf community and adapts its services in response to feedback. As a result, RTÉ provides RTÉ News and weather programmes presented by deaf presenters in Irish Sign Language (ISL) and a high number of programmes interpreted into ISL⁵³.
- In Italy, the NAD has conducted successful advocacy work with the NRA in Italy to ensure higher quality in the provision of interpretation in Italian Sign Language (LIS) and subtitles both on TV broadcasters and on streaming platforms⁵⁴ as can be noticed in the significant amount of programmes interpreted into LIS.
- In Slovenia, the NAD produces in cooperation with RTV Slovenia, a Slovenian public broadcaster, a weekly deaf-led programme “Listen to the Silence⁵⁵” produced in Slovenian Sign Language⁵⁶.
- In Denmark, the public broadcasters DR and TV2 have the obligation to ensure their news broadcasts are provided in Danish Sign Language (DTS). Through a close partnership with a deaf-led media production Døvefilm, deaf sign language users can

⁵⁰ Commission Staff Working Document Reporting on the application of Directive 2010/13/EU “Audiovisual Media Services Directive” as amended by Directive (EU) 2018/1808, *idem*, p. 9.

⁵¹ European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, *idem*, p. 20.

⁵² Austria, Czechia, Denmark, Spain, and Portugal.

⁵³ European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, *idem*, p. 94.

⁵⁴ European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, *idem*, p. 98.

⁵⁵ <https://www.rtvsl.si/tv/oddaja/184>

⁵⁶ European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, *idem*, p. 136.

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watch programmes in DTS that are broadcasted every day on a dedicated sign language channel⁵⁷.

When audiovisual media service providers and National Regulatory Authorities (NRAs) proactively consult National Associations of the Deaf (NADs), the accessibility of audiovisual media services is demonstrably improved. This engagement results in services that are better tailored to the linguistic needs and preferences of deaf sign language users, especially when provided in the national sign language. It is also the responsibility of audiovisual service media providers to ensure this consultation occurs, further promoting inclusive and accessible content for Deaf communities. Specifically, audiovisual service media providers and NRAs play a crucial role in establishing obligations on the audiovisual media service providers to ensure accessibility in national sign language as well as guaranteeing quality through the co-development of accessibility frameworks, including quality charters, codes of practice, and monitoring mechanisms. A notable example is France, where ARCOM, the French NRA established a tailored accessibility obligation on audiovisual media service providers through individualized contract with each of them, and collaborated closely with the NAD to develop a quality charter for linear and non-linear services⁵⁸ as well as a good practices guide for the use of French Sign Language in the broadcasted programmes⁵⁹. Such frameworks ensure that accessibility is not a one-size-fits-all approach, but one grounded in the lived experiences of the deaf community.

In conclusion, Member States should ensure that both audiovisual media service providers and NRAs are obliged to consult organisations of persons with disabilities, including National Associations of the Deaf, systematically when drafting and implementing accessibility action plans or related frameworks. These consultations must not be treated as optional but integrated into national legal obligations under the AVMSD. Only by embedding this participatory model can we ensure meaningful, inclusive, and high-quality accessibility of audiovisual content for persons with disabilities as recommended by the European Regulators Group for Audiovisual Media Services among its five main recommendations to achieve a more uniform approach⁶⁰.

⁵⁷ <https://deaftv.dk/tegnsprogskanalen/>

⁵⁸ <https://rm.coe.int/accessibility-measures-as-implemented-by-avms-providers-for-persons-wi/1680aefb42>

⁵⁹ https://www.arcom.fr/sites/default/files/2022-03/Guide%20de%20mise%20en%20image%20de%20la%20Langue%20des%20signes%20fran%C3%A7aise%20%28LSF%29_4.pdf

⁶⁰ European Regulators Group for Audiovisual Media Services, Report on Accessibility providing an update on developments in the area of regulating and promoting accessibility of audiovisual media services for persons with disabilities, mapping best practices and issuing recommendations to achieve a

POINTS OF CONTACT

The AVMSD require each Member State to designate a single, easily accessible, including by persons with disabilities, and publicly available online point of contact for providing information and receiving complaints regarding any accessibility issues (Art. 7(4)). Based on a questionnaire sent to its members, the NRAs, and a workshop held on accessibility, the European Regulators Group for Audiovisual Media Services could only identify at least three countries that established such an online contact point⁶¹. The European Audiovisual Observatory identified five Member States that have created a specific point of information and complaint, either through a sub-page of the NRA's website or an independent website, while 19 others use the NRA's website to provide the general complaint mechanism, including disability complaints, and to a lesser extent, with information for persons with disabilities⁶². This data reveal a significant disparity across Member States in the availability, accessibility, and clarity of information and complaint mechanisms. In many cases, disability-specific procedures and accessible formats are either lacking or not prominently featured, undermining the right of deaf persons to effectively raise concerns and access redress in relation to audiovisual accessibility. For deaf people, an online contact point is accessible to them when it provides access through remote sign language interpretation (e.g. via video relay services), ensures the availability of staff proficient in sign language, and/or enables online video communication that fully supports Total Conversation. Notably, this significant issue receives little to no follow-up in the European Commission's reporting as can be noticed in its 2024 report on the application of the AVMSD, despite its direct impact on the implementation and enforcement of accessibility obligations.

more uniform approach, 2024, p. 4, available at: https://erga-online.eu/wp-content/uploads/2024/12/SG1-WS3-Accessibility_final.pdf

⁶¹ European Regulators Group for Audiovisual Media Services, Report on Accessibility providing an update on developments in the area of regulating and promoting accessibility of audiovisual media services for persons with disabilities, p. 12.

⁶² European Audiovisual Observatory, Accessibility measures as implemented by AVMS providers for persons with disabilities, *idem*, pp. 23-24.

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RECOMMENDATIONS

EUD recommends the European Union to revise the AVMSD to include the following provisions:

- Expand the scope of the accessibility obligations to video-sharing platforms and other formats such as social media, video gaming platforms and audiovisual sections of news websites;
- Include clear definitions of all access services, such as written subtitles, sign language interpretation, and deaf-led programmes in national sign languages, for deaf sign language users.
- Include the definition of “emergency information” and require full accessibility in national sign languages without exceptions;
- Ensure that accessibility measures, including sign language provision, apply to the full scope of audiovisual content, not just news and emergency information, but also children’s programming, sports, culture, entertainment, movies, and music, among others.
- Set binding EU-wide timelines and targets, both quantitative and qualitative, for audiovisual accessibility across all providers, services, and content types, especially on the accessibility measures related to sign language;
- Include functional accessibility requirements and references to relevant technical specifications including those on the display and quality of sign language provision;
- Fund and promote good practice examples of accessible measures for deaf sign language users across Member States, including deaf-led programmes and content presented directly in national sign languages.
- Establish binding EU-wide targets to ensure 100% of audiovisual content, across public and private linear broadcasters, non-linear media services, and video-sharing platforms, is subtitled, and revise or develop a European standard on subtitle quality to guarantee consistency and accessibility for deaf and hard of hearing viewers.
- Oblige audiovisual media service providers to develop and implement accessibility action plans in close cooperation with organisations of persons with disabilities, including National Associations of the Deaf, under the supervision and enforcement of National Regulatory Authorities (NRAs).
- require Member States to establish a clearly visible, accessible, and disability-specific online contact point for audiovisual accessibility complaints, available in sign language, with enforcement by NRAs and regular monitoring by the European Commission.

EUD recommends the Member States in the implementation of the AVMSD to :

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- Adopt national measures to ensure video-sharing platforms, social media, video gaming platforms and audiovisual sections of news websites provide accessible content;
- Mandate and equip the NRAs to set and monitor clear accessibility targets and timelines in cooperation with OPDs, including National Associations of the Deaf, ensuring measurable progress tailored to deaf sign language users, specifically on the provision of deaf-led programmes in national sign language;
- Require NRAs to develop and enforce quality charters and accessibility codes of practice in cooperation with NADs, ensuring quality sign language access across all audiovisual services;
- Ensure all emergency announcements via audiovisual media services are always accessible in national sign language and provide dedicated public funding to support this obligation;
- Implement accessibility measures in the national legislation so as to ensure that deaf sign language users have full access options when engaging with audiovisual media services by allowing them to choose between written subtitles, sign language interpretation, or a combination of both, in accordance with their individual preferences and linguistic needs.
- Gradually increase the provision of subtitles up to 100% of all media content across all platforms and actively contribute to the development and adoption of high-quality subtitle standards at national and EU levels.
- Enforce audiovisual media service providers to develop and implement accessibility action plans in close collaboration with National Associations of the Deaf (NADs), prioritising the production and broadcasting of deaf-led programmes in national sign languages as the most appropriate form of sign language access, beyond reliance on interpretation alone.
- Enforce audiovisual media service providers to provide access services, including sign language provision, to the full scope of audiovisual content, not just news and emergency information, but also children's programming, sports, culture, entertainment, movies, and music.
- Establish without delay a clearly visible, accessible, and disability-specific online contact point for audiovisual accessibility complaints, available in sign language, with enforcement by NRAs and regular monitoring by the European Commission.

EUD recommends the audiovisual media services providers to:

- Contribute to the increase of sign language accessible programmes over time, in different formats, and in different areas of audiovisual content, in line with the AVMSD and the DSA.
- Consult with the National Associations of the Deaf (NADs) on how to ensure the accessibility of their programmes for deaf sign language users.

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- Contribute actively and comply with the quality charters and accessibility codes of practice developed by the NRAs and NADs.
- Invest in new developments for sign language provision in their services such as the production of deaf-led programmes, the employment of deaf journalists, creators and sign language experts, as well as the involvement of deaf viewers in the co-design of new programmes and in test groups of their programmes.
- Take an active role, through close cooperation with NADs, in educating both content creators and audiences about the importance of accessibility for deaf sign language users, by promoting awareness campaigns to highlight the availability of accessible content, encouraging wider adoption of sign language services, and offering training for content creators on how to make their work more accessible.
- Allocate dedicated and sufficient budgetary resources to ensure the full accessibility of all programmes, including those that require subtitles, sign language interpretation, or other accessibility features, to be included into the budgeting process from the planning stage.

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