



Joint call to the European Commission to advance accessibility in the upcoming AVMSD revision

18th May 2026

Dear Executive Vice-president Henna Virkkunen,

Dear Commissioner Hadja Lahbib,

The undersigned European organisations of persons with disabilities, representing more than 100 million persons with disabilities in Europe, jointly call on the European Commission to live up to its obligations under the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) and to strengthen accessibility in the upcoming revision of the Audiovisual Media Services Directive (AVMSD).

The audiovisual sector has always played a central role in shaping democratic societies and enabling cultural expression across Europe. However, when media content is not accessible, persons with disabilities are denied their most basic human rights: cultural life, political participation, freedom of expression and opinion, access to information and appropriate protection during human-made and natural disasters.

Article 7 of the AVMSD is key to implement the UN CRPD in the audiovisual sector. However, while existing EU rules are an important initial step, it is evident that they have failed to produce the desired effect and equal access to audiovisual media services is not yet guaranteed.

The general wording of Article 7 of the AVMSD and the lack of specific media accessibility requirements under the European Accessibility Act (EAA) have led to divergent approaches to the accessibility of the audiovisual media sector which, in our view, undermine the spirit of this legislation.

This issue has also been identified by the UN CRPD Committee. In its [2025 concluding observations to the EU](#), the committee warned: “*the Audiovisual Media Services Directive lacks timelines and targets for implementation and does not ensure accessibility of video-sharing platforms, social media and the audiovisual sections of news websites*”.(pt. 52(b)). In the same document, the Committee recommended the EU to “*set timelines and harmonised EU-wide criteria for*

audiovisual accessibility in the Audiovisual Media Services Directive, including quantitative and qualitative targets” (pt. 53(b)).

Recent reports, including those of the [European Audiovisual Observatory](#) (2023) and the [European Regulators Group for Audiovisual Media Services](#) (2021), provide detailed evidence on the different measures taken by Member States. Notable findings include:

- **Accessibility obligations differ depending on the AVMS provider.** In general, they are higher for, or only applicable to, public broadcasters while obligations for commercial broadcasters and video-on-demand platforms are weaker or non-existent¹, undermining the purpose of Article 7(1) of the AVMSD.
- **Accessibility obligations differ depending on the type of access service.** Certain access services are prioritized over others, leading to discrimination among different disability groups. In general, pre-recorded subtitling is more prevalent than live subtitling, audio description, sign language and spoken subtitles².
- **Quality of access services.** Few Member States have introduced quality considerations in the provision of access services. This results in situations where subtitles are not specifically designed for deaf and hard-of-hearing persons, audio-description is not delivered by trained professionals or sign language interpreters are not qualified or not easily visible on the screen³.

¹ According to the [2023 Audiovisual Media Observatory Report](#), (p13 - 14) linear TV is the main group regulated. 16 MS have stricter obligations for public broadcasters and 7 MS regulate Video-on-demand platforms separately. Out of the 17 Member States (MS) that impose quotas, only 7 have them on video-on demand platforms, 12 apply different quotas for public and private broadcasters and 3 MS only have quotas for public broadcasters

² According to the 2023 Audiovisual Media Observatory Report, while 17 MS oblige to use one or more access services, 9 have total discretion. 15 MS have quotas for subtitling, 11 MS for sign language, 9 MS for audio description and only 4 MS for spoken subtitles. Similarly, [the 2023 report on language diversity and accessibility of streaming platforms](#) (Disney +, Netflix and Amazon) shows that audio-description is scarce in all languages, but specially in languages other than English and that while subtitling is generally more available, it is not available in all languages.

³ According to [ERGA 2021 report](#), (p15) very few Member States (MS) appear to have introduced qualitative obligations: 8 MS for linear broadcast and 4 for on demand. The [Audiovisual Media Observatory Report](#) (p18) goes further, indicating that only a limited number of MS have a code of best practice or quality assurance document for access services (5 MS for subtitling, 3 MS for sign language and 4 MS for audio description).

In addition, we must not overlook the changes in the way people consume audiovisual services. While linear television, where accessibility obligations are traditionally stronger, remains relevant, an increasing number of people access audiovisual media content through video-on-demand platforms, video-sharing platforms, online news sites and social media. Unfortunately, the existing EU legal framework fails to address this reality, leaving accessibility as a voluntary practice.

To truly advance accessibility for persons with disabilities, and fulfil its obligations under the CRPD, the European Commission must ensure that the upcoming AVMSD revision:

- Strengthens the wording of Article 7(1) to ensure that all audiovisual media service providers - both public and commercial TV channels as well as video-on-demand platforms - continuously make their services accessible to persons with disabilities. This means to ensure progress on media accessibility for all AVMS providers and for all access services.
- Establishes harmonised accessibility requirements across the different access services⁴.
- Ensures that emergency information (article 7(5)) is accessible to all persons with disabilities with all necessary access services and easy to understand content⁵.
- Ensures the diversity of accessible content across all kinds of programming, including programs for children, sports, culture or films.
- Addresses the inaccessibility of video-sharing platforms, social media and online news platforms⁶.
- Strengthens cooperation of audiovisual media service providers and regulators with organisations of persons with disabilities.
- Establishes robust monitoring and sanctions mechanisms for non-compliance.

⁴ The European Accessibility Act is a good example of this as it already sets harmonised accessibility requirements for certain products and services. In the context of the AVMSD, access services must include subtitles for the deaf and hard of hearing, sign language, audio-description, spoken subtitles and easy to understand formats.

⁵ According to the [Audiovisual Media Observatory Report](#),⁵ only 21 Member States require this in their legislation and 5 allow audiovisual media broadcasters to do it to 'the best' of their ability. Similarly, [the 2025 report by the European Broadcasting Union](#) shows that only 49% of public sector media (PSM) have defined some rules and recommendations to provide access services in case of emergency content

⁶ The AVMSD should require (1) the accessibility of video-sharing, social media and online news platforms, including related websites and apps, (2) the availability of accessibility tools free of charge and by default and (3) the provision of access services for certain actors with editorial responsibility or influence.

- Ensures that access services become a mandatory component of exploitation rights so that they are automatically transferred when content is resold⁷.
When access services are unavailable, there should be the possibility to add them to the content without the need of acquiring additional rights.

In other words, the AVMSD must move beyond general duties of progressive improvement and instead promote measurable and enforceable minimum accessibility obligations at the European level. In our experience, the best way to ensure this is through quotas that specify with clear timelines the percentage of audiovisual content to be made accessible for each type of access service and for each type of audiovisual service provider (public and private broadcasters and on-demand platforms). To date, only 16 Member States have introduced such system⁸. The revised AVMSD should require this to all Member States.

Although we recognize the relevance of the topics identified so far by the Commission during the evaluation and consultation process⁹, we believe that any meaningful attempt to improve the existing rules on audiovisual media services, should address the concerns outlined in this letter to ensure equal rights for persons with disability.

We thank you for your consideration and remain available to further support the Commission in preparing this important initiative.

Yours sincerely,

European Blind Union (EBU) Tytti Matsinen, President

European Disability Forum (EDF) Gunta Anca, President

European Federation of Hard of Hearing People (EFHOH) Lidia Best, President

European Union of the Deaf (EUD) Sofia Isari, President

Inclusion Europe Jyrki Pinomaa, President

⁷ This should include the possibility to modify them, as national standards can be different.

⁸ [Audiovisual Media Observatory Report](#) (page 15) - BE(VL), BE(FR), BG, CZ, DK, ES, FI, FR, GR, LT, MT, NL, PL, PT, RO, SE, SK.

⁹ Among others, advertising rules, level playing field between traditional and new digital players, protection of minors on video-sharing platforms.