

**ANEC comments on CEN/CENELEC/ETSI JWG eAcc Internal ballot on BSI and DIN proposal for a transposition of EN 301549 "Accessibility requirements suitable for public procurement of ICT products and services in Europe" to ISO**

ANEC could support the transposition of EN 301549 "Accessibility requirements suitable for public procurement of ICT products and services in Europe" at the ISO (IEC and ITU) level if a number of clarifications would be made and several conditions would be met, as follows.

While we share the goal of promoting the results of European work on the international stage, whenever possible, for the benefit of consumers globally, convergence of the standards is dependent upon greater coherence of the legislation which governs the concerned product/service.

Owing to the stronger link of European standards to public policies such as the presumption of conformity with European legislation to which Harmonised Standards give rise, European standards have a specific impact on consumer protection. It is very likely that EN 301549 will become a Harmonised Standard under future European Directive on web accessibility of public sector websites.

The transposition proposal mentions "the preference for the maintenance procedure to be run by ETSI in liaison with ISO/IEC/SC 35 and that is documented in the explanatory memorandum that accompanies the submission". ANEC has not seen such explanatory memorandum and therefore is not able to assess the specific implications from a consumer point of view. Would it be an identical transposition or would it entail the re-discussion of the content of the standard?

In Europe, ANEC is a Partner Organisation of CEN and CENELEC and a full member of ETSI, with participation rights (and obligations) at the technical and governance levels. However, there is no equivalent consumer involvement in the international standards bodies for the moment and ANEC is not as systematically nor automatically involved with International standards making as it is with European process.

Even if the transposition would be an identical transposition, according to the present rules, any future revision of EN 301549 will be done at the ISO level. The main implications for ANEC include more difficulties in influencing the development process. ANEC has only an observer status in ISO (Liaison status A or D) and ISO/TCs are encouraged to meet around the world, which entails added costs and time for our voluntary experts. However, there could be the possibility for ISO to hand the maintenance responsibility to ETSI as being the lead-drafting body. Again, we would be grateful to get more information on the exact procedure to be followed for such transposition.

Last but not least, EN 301549 is a triple logos standard, (CEN, CENELEC and ETSI) available for free as its development was financed by the European Commission. It is unclear how the transposition at the international level would change these aspects.

We look forward to receive more clarifications about the procedure to be followed for the transposition of EN 301549 at the international level in order to be able to better assess the implications from a consumer point of view. Until then, we would need to express a negative opinion on the proposal.

**END.**