

Lukas ([00:00:01](#)):

All right. Thank you for joining everybody. Good afternoon, good morning, wherever you're located. I'm here on the US East Coast, so it's about 9:00 AM for me, but I know we got people joining from all over. So welcome. Couple, just really quick intro things. So this webinar is being hosted in partnership with our partner Maverick. So Maverick is a publishing consultancy founded in 2008. They have offices all over the world and they do all different things that publishers might need, all different services they offer. See a list there. So if you need any of these services, please reach out to Maverick. I'll post some contact information in just a second, but they're a great partner and so we really appreciate that. So Will Awad is going to be hosting this webinar today in just a minute. He's a Senior Associate with Maverick and he's also the Founder of iAccess Digital and he helps people with their accessibility all over the world.

([00:01:08](#)):

He's an expert in the field. He's advised on accessibility compliance with all the most common guidelines like W3C, WCAG, in all different market sectors. He does audits, he has spoken at conferences all over the world and he also has a master's degree in international law. So he's got some good insight into these rules and regulations, but I should say that he is not a lawyer. This is not legal advice and I'm not a lawyer either. And so none of this is legal advice. We're just explaining what these new rules are going to entail. So we also have a few Typefi folks on the call. I'm Lukas Kaefer, I'm the Marketing Manager, and then we also have Stephen Laverick and Guy van der Kolk on the call as well.

([00:02:03](#)):

I'm sure you all know Zoom, but you've got mute buttons on the left. We ask you please stay muted during the presentation, but feel free to unmute at the end and speak up and ask questions. We'll have some time for that. I will send out this recording within a day as well. So Typefi, Typefi is based in Australia, founded in 2001 and our main thing is automated publishing software, so publishing up to 1000 pages per hour from InDesign. We also have a few plug-ins and another product called Script, which is a way for you to access InDesign server at a really, really good cheap cost. We also are working on a replacement for Inera eXtyle called Typefi Orion, which will be releasing end of this year. If you use eXtyle, I'm sure you're well aware the sunset is fast approaching, so we'll have that ready with plenty of time to spare.

([00:03:04](#)):

So this is what Typefi does. This is kind of the automatic layout process that automated publishing software goes through, placing everything on the page. And the great thing about it is it can make fully accessible publications as well, fully a compliant. It can put all text in here and you can set up rules to make sure that contrast is to the proper level. It can create all those formats you need and it really saves you time. As you can see there, one of our clients cut their production time from a month to just three days. So really massive, massive time savings. And we do have another webinar in a few weeks where we're going to demonstrate some of these features of Typefi. So keep an eye out on your inboxes. I'll send that around shortly so you can register. But yeah, that'll just be a demo of Typefi's accessibility features and how we can publish accessible content automatically. So with that I will give the reins over to Will. Thank you.

Will ([00:04:09](#)):

Thank you. Okay, I'm going to share my slide. Hopefully you can all see my slides here. Yeah?

Lukas ([00:04:22](#)):

Yep, I see it.

Will ([00:04:25](#)):

Okay, I'll give quick intro about myself as a thank you Lukas for the introduction. My name is Will Awad, I'm based in London and I'm a Senior Associate working with Maverick helping their clients on their digital accessibility journey. At the same time I founded iAccessDigital after a while back and I advise and advocate for digital accessibility in Europe and in the US. Clients from both Atlantic, side of the Atlantic. And also, I am in a few study groups, in NISO working on metadata, for example, for PDF remediation and we are currently working with Daisy Consortium on making content accessible in the Gulf State in Arabic language. I speak a few languages and one of them turned to be Arabic as well. So thank you everybody for joining this presentation. I think it's not long to go before the European Accessibility Act comes into force. As you all know, the European Accessibility Act is major game changer for publisher and for anybody who have presence and the digital accessibility.

(00:05:53):

So today we will cover what is the EAA saying and how that impacts businesses, how different countries actually interpret this EAA or handle this EAA. We'll talk about Ireland, Germany, and few other Scandinavian countries. We will mention something about the workflow for frontlist and backlist. That's a major thing that publishers are currently thinking about, how to deal with their backlist. The frontlist is slightly easier for them at the moment. We will be touching on some AI and how is the AI actually helping or not helping publishers to be honest, it is technology moving and I guess we need to move with the technology as well. Some will talk a little bit about alt text and the Web Content Accessibility Guidelines and some certifications that currently are going to be implemented in the EU for accessible EPUBs. So what is digital accessibility? So digital accessibility is about making sure that everyone, whether you are anywhere in the world, be able to access content seamlessly and would have equal access. Being inclusive and being part of the society. Inclusivity, it's a big thing. We just did a presentation for NISO with Stephen Laverick here and we discussed about digital accessibility as an inclusive design, inclusive content for everyone, ensuring that everyone has the equal opportunity to participate in society. So without making the content accessible, we actually forget that there is 20% of the world who has suffered some kind of disability. By making the content accessible, you will reach this 20% as well.

(00:07:56):

So what is the European Accessibility Act? The European Accessibility Act is only a directive. Basically it sets the minimum standards for what content accessibility should look like. Basically it's a mandate that every country in the EU, of the 27 EU countries, to introduce legislation by 2020 to incorporate the European Accessibility Act into their local legislation. The aim of this European Accessibility Act is to make sure that product and services in the EU are accessible for people with disability. They define personal disability as the same definition that used by the United Nations Convention on the Rights of Persons with Disabilities. And it says the person who has a long-term physical, mental, intellectual or sensory impairment, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. So that's the same definition. It's been used by the UN and it is actually used by the European Accessibility Act. Sorry. Okay, so what does the EAA apply to? The EAA, the European Accessibility Act, applies to any business that has minimum of 10 people in the EU. Somebody raise their hand. I can do you want to ask the question or shall we proceed?

Audience (00:09:42):

No, sorry, clicked on it by accident. Carry on.

Will (00:09:44):

Okay, sorry. So the EAA applies for any businesses in the EU that have a minimum of 10 people and any business that provide product and services to the EU, which means this: even if you're based in the United States or in Saudi or in, I dunno, Australia and you're trying to do some business with the EU providing

product or service, your product or service must be compliant with the European Accessibility Act regardless of anything else. So if you are trying to do business with the EU, you must ensure that your digital content, your website, is fully accessible and compliant with the Web Content Accessibility Guidelines. With the European Accessibility Act basically. And this is why I say it's a game changer because a lot of businesses in the US that deal with companies in the EU, they must ensure that their content is fully accessible and compliant with European Accessibility Act.

(00:10:46):

There is consequence if you don't do that. We'll discuss that shortly in the next slide or so. That is the EAA applied to the following two things. Secondly, the EAA covers two main issues. Article two in the EAA covers products and services. Basically product they are referring to computer operating system, hardware, smartphone. If you look, all of you look at your smartphones, there are accessibility features in it. TV equipment, e-Readers, which it's the key for reading e-Books, which we will be talking about shortly. And so on the service they define the e-book as a service. So it covered e-Books, banking services and so on. There's a lot of things that's covered under the EAA and this is the list here.

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What is the requirement? Under annex two of the European Accessibility Act outlines the requirement for product or service. For example, ensuring interactive and perceivable, operable, and understandable for a user with disability. I will go through this in a second. And annex two provides the solution to meet this requirement. For example, including screen reader compatibility for digital interfaces or tactile indicators for physical products. So basically the minimum requirement under annex two is digital interface must be perceivable, operable, and understandable. The website and application must be screen reader compatible. Physical devices must include tactile indicators. And then under annex two, it offers a solution like adjust font size, add alternative text to images, caption for metadata, for example, every video should have a caption and transcription as well. Accessible navigation and payment systems in e-commerce. So basically that's the things that we need. So when we say, this is the Web Content Accessibility Guidelines, say it has to be pure.

(00:13:04):

Pure, which is perceivable, operable, understandable, and robust. It's the same requirement that the EAA need to make sure the content is accessible. So perceivable content can be seen or heard, operable you can use via mouse or keyboard or just the assistive technology device, or understandable by the assistive technology device. So if you talk to it as well. Understandable, easy to navigate and interact with it. It must be robust, compatible with the current and the future assistive technology. So if you increase the screen, you don't lose the contrast of the beige, it should just fit in perfectly in your assistive technology device. Remember there's one in five people in the world suffer with some kind of disability. By making sure that your content is accessible and following it, the pure requirement under the EAA, and the Web Content Accessibility Guidelines, you'll be able to reach some of this 20%.

(00:14:16):

I'm not saying that you're going to reach all this 20% but your product can reach this 20% and that means you have reached a wider market. Your return on investment might be good, your reputation is also improved, and all of that by ensuring that you include everyone when you publish any content that wasn't accessible and now it is accessible. When does the EAA take effect? So as I said, the European countries had until 2022 to introduce legislation into their law. So basically, the deadline for the EAA is the 28th of June, 2025. That's the day it's going to come into effect, which means we only have less than 60 days probably for businesses to start implementing these accessibility guidelines that are mentioned under the EAA. For example, in Ireland they introduced a legislation called the European Union Accessibility Requirement of Product and Service Regulation 2023. It doesn't come into force until June 28th, 2025.

(00:15:38):

It's exactly the same as the EAA. And in Germany, I can't say the name in German but it's called Barrier Free Act which was introduced as well and it comes into force on the same date as the European Accessibility Act and so on. I mean I brought some posts, I don't know if Lukas can share this, about the European Accessibility Act about the German and the Danish. I wrote some articles and they are all available in LinkedIn. I'm sure we can send the link to that as well. So businesses currently are trying to figure out when can we do, what can we do by that date? The date doesn't mean you should not have started by making your content accessible. You should already have been making your content accessible before the deadline. I understand that people might have a lot of backlist titles that they need converted, but showing a good faith that you are already working on your backlist and making sure that some of this already is in a plan and you're working on making it all accessible, that will help you and protect you from any consequence for non compliance.

(00:16:48):

The frontlist is a different matter that should already been in a plan and the workflow should be in place for all businesses. There is something called the grace period in the EAA. The EAA doesn't say that five years grace period from June 25, 2025 to 2030 mean you should not work on your back list until 2030. That's mean if you don't finish the entire content, you still have some period for you to work on to complete your backlist conversion, but you have to show good faith. You have to prove that you are actually working on your backlist conversion and making sure it's fully compliant and it'll be ready by the deadline. And one important thing, at least if you haven't done it yet, make sure you add an accessibility statement on your website to say where you are and what you're currently doing and what is the plan in the next six months to couple of years in this area.

(00:17:57):

So as you know, every single law have an exemption or exceptions and the EAA is not strange to that. So, you are exempt from complying with the European Accessibility Act if you have less than, fewer than 10 people working in the business. As we said, it applies for 10 people or more, you are exempt if you have less than 10 people in your business. That's the first exemption. And secondly, your balance sheet should total not exceed 2 million Euros. I don't think there's a lot of businesses will fall under this, but there might be fewer businesses that will fall under this category. Secondly, the disproportionate burden or fundamental alteration to the content or the website. Okay, this is an exception saying that if changing the content or making this EPUB fully accessible is going to actually have a huge burden on the business, then you are exempt from making this content fully accessible.

(00:19:12):

However, you have to show the commission of each country. For example, in Ireland, you have to show the commission, they have to see evidence that you actually will be under disproportionate burden. If you make this accessible, you might be bankrupt, you probably don't have enough money to do it and the business will suffer. You must have evidence to prove that there is an area there that doesn't allow you to do this content fully accessible. I put an article that's been published also, I'm sure we can share that, it's about disproportionate burden should not be used as an excuse not to comply with the European Accessibility Act.

(00:19:57):

So please take a look first. I mean I give you a couple of examples. A title that has a lot of images that I'm working with one of my clients. This title has really in every page about 10–20 images. It's a travel guide and what we did, we made sure that this title is fully accessible and we added in metadata, "this title has a lot of images and not all the images have alternative text," but the title is fully accessible and compliant with the Web Content Accessibility Guideline 2.2 Level AA. So there is always a way to make your content accessible and without having disproportionate burden as an excuse not to make it accessible. As you know, for noncompliance, there will be a consequence from different countries if you don't comply with the EAA or the legislation of that country. For example, as we said in Ireland, they introduced their

own legislation that mirrors the European Accessibility Act. In Ireland, they went the extra step and they put imprisonment terms if you do not comply with the EAA, and financial terms. So the imprisonment term is up between six and 18 months and there will be a financial penalty and probably you will be disbarred or you won't be able to sell your product in Ireland. In Germany, you have an order of cease and desist, which means you cannot sell your product or services in Germany and you'll have financial penalty as well. Other EU nations have different penalties and majority of them is about financial penalty that will impact businesses as well.

(00:21:56):

So what is the impact of business? The EAA impact on businesses. Accessible business gain bigger reach if they make their content accessible. As we said, there's one in five people in the world have some kind of disability and there's a hidden disability that we don't see. I dunno how many people are colorblind, I can't see that. But there is a lot of other disabilities. So by making your content accessible, you can reach this 20%. It's a reputation for a corporate business. It's a social and moral impact, which is important thing. It's avoiding legal action. I mean I know the culture in the US for example, under the ADA, you get sued if you don't make your content accessible. We don't have that culture in the EU, but soon we will find out once this EAA come into effect in July the first, let's call it this way because the 29th, I think it's the weekend.

(00:23:00):

So July 1st we will find out what is the impact of the EAA. But then as I said, the impact also, the digital accessibility directly aligns with the United Nations Sustainable Development Goals. Number 10, which is reduce inequality and number four, which is quality education. So it's a moral issue. It is the right thing to do. You avoid legal fines and ensure that the reputation is intact and you reach a wider audience by making your content fully accessible. So there's another thing I'd like to mention here. We know that there is a legislation that is the regulation, it's the European Accessibility Act or the American with Disabilities Act. So that's one, is there is a regulation. There is a requirement. The requirement for accessibility is the Web Content Accessibility Guidelines 2.1 Level AA. That is the minimum requirement for making content accessible. It's the same requirement for websites or e-Books.

(00:24:20):

And the specification for e-Books is the specification, EPUB accessibility, is 1.1, which is part of the EPUB 3.3 recommendation. I just want to mention something about the Web Content Accessibility Guidelines. They are an international guidelines that's been followed by everyone, whether in the EU, in the US, Australia, anywhere, they're all the same. So one of the requirements says, every image should have alternative text. It's the same wherever you are. So ensuring that you're following this requirement, then you are complying with the Web Content Accessibility Guidelines. And now the law is going to be changing, to the Web Content Accessibility Guidelines should be 2.2. Majority of the work that we're currently doing is 2.2 and not 2.1. But for your website you still need to follow the 2.1 Level AA. As we said, it's an international standard. It's been developed by the World Web Consortium, W3C, and it's one single source for making content accessible everywhere, anywhere in the world.

(00:25:32):

So what is the main issue about accessibility, components of accessibility? Making sure you have, any business should start thinking about it. Putting a workflow in place, ensuring alternative text have an image, optimised metadata, and colour contrasts. That's the main issue that you need to start working on. The workflow is, here, we're talking there's two workflows that we need to discuss. You have the backlist conversion and you have the frontlist conversion. So the frontlist conversion, which some people refer to as born accessible, it's making sure that you're producing new titles straight away, fully accessible and compliant with the Web Content Accessibility Guidelines. I would recommend to follow 2.2 Level AA, but at the moment it's only 2.1. So make sure any new title you're going to produce before you get the



manuscript, amend your contract with your author, ensure that the author, who is going to supply the manuscript, also provides the alternative text for the images.

(00:26:43):

The author is the subject matter expert who cleared the image rights, knows how this image needs to be used in the title, and has the copyright of these images to be used. So they are the subject matter expert. So by amending the contract and ensuring that you follow this, you're getting a lot of your work done for you. The alternative text might have a hefty price on it because you need to hire someone, freelancer or subject matter expert to write the alternative text. And then ensure that you go and work with a vendor who's been working on this area. And I'm sure there is, I've seen that Benetech for example, has a list of approved vendors that they've been certified to provide accessible EPUB conversion. But you can find other vendors that they already did this kind of work and work with them, because ensuring that you are compliant, it's important for your business to avoid legal action.

(00:27:52):

So the workflow for frontlist should be already in place in most businesses. The big major issue that businesses worry about now is the backlist conversion. Look, the backlist conversion is not an easy thing to do straight away and complete by the deadline of June 28th this year. But showing a good faith, as I mentioned, and the plan in action will take you a long way with the European Accessibility Act. So draw a workflow plan, identify what is the main title, that you currently have and the one that has less images, and then the one you can do straight away. And then engage with vendors who actually have certification to provide fully accessible and start that work. Hire people in your organisation that understand the Web Content Accessibility Guidelines and start working, ensuring, testing the backlist and make sure it's compatible with the Web Content Accessibility Guideline and it meets the requirement and start doing some of it.

(00:29:06):

There is another presentation I attended, or I was part of it, it's just, what do you do if you have thousands and thousands of titles that have been published? So make sure you say, okay, up till this date, from 2020 until now all my content is fully accessible and compliant with the Web Content Accessibility Guidelines 2.2, et cetera. You can sing it, you can tell everyone about it. Anything prior to 2020, for example, you can say, "this title is not available in fully accessible format, but it's available on demand." So if you request something, we will make sure we go and do it, but we haven't done this work yet. But anything recent, we have completed, anything prior to X date, it's request on demand. You request, we go and make it accessible and then send it to you. That's another way, just as long as you're telling everybody where you are and making sure you're transparent and letting your client know everything about your backlist conversion. I am working with a client that their backlist conversion goes a long way and most of it's not even available in text PDF or even in InDesign. They still have an image PDF or they need to scan the title and they're asking, how can we do it? It's going to cost a lot of money. But this is another way of ensuring that my content, my backlist conversion or my backlist title, is fully accessible from that date to this date. Anything prior to that, it'll be available on demand.

(00:30:51):

So I mentioned certification and I've been talking about it quite often. So there is a new certification. The old one, as we all know about Benetech. Benetech was the first company of the United States to certify vendors and publishers providing fully accessible EPUB content. Recently, Vision Ireland, Vision Ireland is the institute of the blind in Ireland, they set up a new European certification for making content accessible for EU publishers. They launched that at the London Book Fair and they're promoting it for all the EU nations. And they want to do similar to Benetech, ensuring that all EU publishers follow the same standard and the Web Content Accessibility Guidelines 2.2 Level AA and ensuring that the content is accessible. They launched and hopefully that's their plan, but you can get in touch with them and find a bit more information if you need to. We have LIA, this is also a certified organisation in Italy that

provides certification. I haven't seen anybody outside Italy who actually engages in the certification with LIA, but I think it's mainly for the Italian market. So this is three certifications that I am aware of. There might be some more, but I'm not sure. So I have the one from Benetech in the US and it covers some EU, some of the EU countries joined. Vision Ireland is mainly for the European publishers, and LIA is based for Italy.

(00:32:42):

So we've been talking a lot about the European Accessibility Act, about digital accessibility and the one thing that always comes up is alternative text and AI. Okay, so I'm going to talk a little about my view only. As I said, we are here, I'm not a lawyer. I'm here just giving my personal view and from my working in this field for the last 10 years and what I advise all my customers and clients. So look, images require alternative text and that's part of the regulation unless that image is decorative. Yes, there's a lot of backlist conversion required that has a lot of images and these images require alt text. Authors already wrote the books. They don't want to go back and write the alternative text. So businesses have options. The others use their editor in-house to write alternative text to images or engage with a freelancer to write alternative text, or probably use artificial intelligent AI to write the alt text.

(00:33:46):

However, I don't use AI to write my alternative text. I use the AI to help me navigate or understand some of the image requirements, but I have an author and editor who review every single image before we put it into the e-Books. So you can use the AI to give you some guideline where you are in the image or what's the image is about. But unless the AI understand the context around the image, it's going to be difficult to give the exact description, but it can help you. It's a step towards inclusivity, as we said, a step towards helping you provide a good alt text for the image. If you get your technical and editorial team to review it and then add it to the, that should be a good way to move forward. But I will not say do not use AI. I'm just saying personally, I have freelancer, subject matter expert, who write the alternative text to add to the e-book. So AI is here and it's not here to take our jobs. It is as good. The AI is the mimic of a human being. So it's as good as the data that's been fed to it and slowly it is improving. But relying on AI a hundred percent for alternative text, I don't recommend this yet, maybe in the future.

(00:35:17):

So we've been talking about accessibility and accessibility metadata is very good for search engine optimization. Good accessibility, it'll boost it, the search engine optimization, because this engine relies on the semantic tagging and the metadata and the image description, the same thing a screen reader reads. So all this information that you put in the titles of the book, it's very important because it'll help finding, discovering this title and letting people know if this title has math equations or this title has images with alt text or images without alt text, whether there's a video, whatever it is, it'll help discover that title and ensure that people who's using assistive technology have all this information. So it's improving your books and ensuring that your title is fully accessible and discoverable.

(00:36:25):

So something that's being talked about a lot, and this is not part of the EAA as we discussed in this presentation at the beginning, but it's worth mentioning because the PDF is part of online content. Now the European Accessibility Act did not mention the word PDF in the act itself. It never been seen, it never mentioned it, it never referred to it, never said anything else. But in my personal view, it says if your website should be accessible. So if your website needs to be accessible, any content on your website should be accessible. PDF might be part of that. For example, marketing materials should be accessible because it's in PDF. So we will see what will happen in the next year or so about the EAA and the PDF. However, we have something happen in April this year when the ADA, Americans with Disabilities Act, article two, title two, and said that anything on the screen, the Department of Justice issued a ruling to say that anything on the screen should be accessible and that include PDFs.

(00:37:53):

So it's going to work both ways. If you are publishing content and in the EU and that content will be available for the people in the US, that content should be accessible as well. So your PDF might require accessibility as well. But just time will tell once the ADA article two comes into force and which will be in force in April next year, 2026, for places with more than 50,000 people population. And it'll be for 2027 for smaller organisation in 2027, April 2027. So basically, this will impact also the European nations making sure the PDF is also accessible. So that's the deadline for the ADA Title two, which we just mentioned.

(00:38:50):

If your district is less, population is less than 50,000, it's 2026, more than 50,000, it's 2027. So moving forward, what I would say is this, the European Accessibility Act is here to stay and the impact of the European Accessibility Act is huge. For example, in the US it's a major market for US businesses and publishers in the EU. So the US should comply with the European Accessibility Act because it'll impact them as well. Secondly, the Web Content Accessibility Guideline 2.2 is the requirement for making sure that your e-Books are fully accessible. The Web Content Accessibility Guideline is international guideline that we all need to follow. Businesses should start thinking about making sure that their website is accessible, your content, the backlist, you're already working on it and making sure it's accessible. If you have a platform, ensuring that you have a VPAT, which is one of the requirements, hiring people with accessibility to promote in your organisation, with accessibility knowledge, to promote digital accessibility in your organisation. Make sure you carry out an audit on your website, on your platform, and in your content.

(00:40:27):

Take the first step and start actually building the first title, first PDF article, first HTML page. And digital accessibility is a journey. It's just everybody in the business should be involved in making sure that we meet the Web Content Accessibility Guidelines and ensure equality and inclusivity in all our content. I want to say thank you for listening and thanks for Lukas for organising this webinar. And I am putting something about the ADA Title II in the next couple of months because that's going to be also a major game changer for businesses who actually produce only PDF, for example, like journals. And that's something we need to discuss and see how that will impact in the EU. Thank you all and I'm happy to answer any question you may have now.

Lukas (00:41:34):

Thanks Will. Yeah, feel free if anybody has questions you can post in the chat or just speak up. We still have 20 or so minutes. So maybe I'll kick things off then Will. So something that, I know it came up in previous webinars, and I know a lot of Typefi customers have this issue. So things like large complex tables or mathematical equations, I'm going to assume that those would also have to be accessible if it's in an e-book format or something. Can you suggest some tips to get started with doing that?

Will (00:42:26):

Yeah, I will talk about mathematical equation because it's a biggie to be honest. I have recently done 20 titles that are very heavy in maths. Basically is this, we don't know what everybody is using to read their e-Books, what assistive technology they're relying on. So you have to make sure that your math equations actually display and read correctly with assistive technology. So what we do is we create the math, we provide the math equation in SVG, we provide the SVG, we provide it, we give it an alternative text, and we give the mathML for the math equation. So you have it in three different ways embedded in the EPUB. So you can see it as an image, you can read the alt text of the image, and it is available in the mathML so it can render it correctly as well. So if you're doing it in, I know it might be costly, it might be



complicated, but it's the best way we found that the client is even happier because we don't know what assistive technology everybody uses.

(00:43:42):

Now when it come to tables, just think about the backlist titles. Most of the tables have been done as an image in the past. So if you have an image, then that image requires alternative text. But if you have a table, you can capture the table as HTML format and it'll display correctly without requiring to have the alt text for an image. So one of the costs that we can see now, even if you have one of your backlists have a lot of tables, the tables need to be converted to HTML format. That's the regulation saying, if you have a table, it should be in HTML format, it's easier. But if you want to have the table as an image, then you need to think about, okay, the regulation 1.1 says every image should have alternative text, then you have to write the alt text for the table and it's going to be complicated by capturing as HTML table, then you don't need to provide the alt text. I hope that answer your question.

Lukas (00:44:45):

Yeah, yeah, that was very helpful. We did have a few questions come in in the chat while you were talking. So Chad asks, well he said that you mentioned websites and EPUBs but not PDFs. And he's wondering, are PDFs part, are they under the EAA? Are there rules about PDFs?

Will (00:45:11):

As I mentioned, the PDF has not been mentioned anywhere in the EAA. The EAA referred mainly to e-Books and did not refer to any PDF. So this is a question that's on everybody's lips at the moment in the European Union. Since they're not being mentioned, are they exempt? But again, if you think about it, making content accessible is a requirement for inclusivity under the ADA, requires now anything on the screen should be accessible. So we will be following suit hopefully in European countries as well soon. We don't know yet, the short answer. But what I advise people, for example, if you have journals, is your journal available in HTML format or just in a PDF format on the website? If it's on the website in a PDF format, the regulation says that your website should be accessible, so if you have a PDF on your website that PDF should be accessible. Otherwise your website is failing accessibility. So it's a catch 22. If you're displaying your journal in HTML format on your website and the PDF, you can always add something in your metadata, say, okay, all our journals are available in HTML format, which is accessible, but the PDF is there and it's not accessible.

Lukas (00:46:51):

Okay, that's good to know as well. There was another question.

Will (00:46:58):

Raj, we cannot hear you.

Lukas (00:47:06):

No, we can't hear you. I'll keep looking through the questions here. So let's see, alt text. So if you're working on a document and it has hyperlinks in it, those links should have alternate text. Graf is asking, is it possible to do that InDesign and how would you do that? I'm not sure if you know.

Will (00:47:44):

So well this is about PDF mediation yet.

Guy (00:47:50):

Chad already answered. Sorry, Guy here. Chad already answered that question in the chat as well. In the latest versions of InDesign, I think, Chad, correct me if I'm wrong, the feature of adding alt text was introduced in 2024 or 2025, quite recently, or am I completely misremembering?

Chad ([00:48:10](#)):

Yeah, it's actually been in there for quite a few versions now, but basically if you create a hyperlink in InDesign using the hyperlinks panel, when you're in the hyperlinks property, there's an accessibility tab that you can click on that'll allow you to add alternate text to that hyperlink. And I think that applies to EPUBs and PDFs.

Will ([00:48:43](#)):

Thank you Chad.

Chad ([00:48:45](#)):

Sure.

Lukas ([00:48:50](#)):

Let's see. So a question just came in from Mohana and she's asking, so her example is that they have an Australian publishing product and from now on they're only going to be testing against the VPAT EU criteria, and she's wondering is there a grace period to complete that transition?

Will ([00:49:26](#)):

The grace period refers mainly to the backlist conversion, and that is the grace period I'm mentioning. It's just for, because we know that backlist could be huge and that's what they're giving the grace period. Now that's, hold on, I just need to read the question again if that's okay.

Lukas ([00:49:53](#)):

Yeah.

Will ([00:49:55](#)):

Okay.

Lukas ([00:49:55](#)):

At the bottom.

Will ([00:49:56](#)):

Yeah. According to the, okay. Five year grace period only applies for backlist conversion, not for the VPAT. You don't have five years to create your VPAT for the website. However, if you think about it, because every country has really interpreted the rules differently. For example, one of my clients in Ireland, they have taken legal advice from their lawyers. For example, building a new website might be disproportionate burden for them. So they're getting time using the grace period to build that, a new website, they don't have to do it by June 28th this year. They said, okay, we are going to use this period to make sure that we have, our website is fully accessible by that deadline, but for their backlist, they can't do that. They're working on making sure their backlist is accessible. So the grace period referring to the books, the backlist title and not the platform itself, you want to use the disproportionate burden for building your website or making sure you get your VPAT, all of it, then that is not in the EAA itself.

Lukas ([00:51:24](#)):

Chad, did you have something to add or a question?

Chad ([00:51:26](#)):

Well, the only thing I wanted to mention, I know Mohana is saying that she's planning on basically testing their product against the VPAT criteria, which I don't think is a very good approach because a VPAT is basically just a statement saying that a particular product either passes or fails regarding accessibility. So using that as your benchmark is not really a good approach. You should be using WCAG as your guidance for making your content accessible. I wouldn't want to see you go down the wrong rabbit hole, if you will, because like I said, a VPAT is specific to a particular website or product or kiosk, whatever the product may be. And so to test against that, I don't think is a very valid approach.

Lukas ([00:52:30](#)):

Makes sense. Thanks Chad.

Guy ([00:52:34](#)):

Can we recommend a helpful site to resolve problems? I would say the PDF accessibility Facebook group, Chad, we're both part of that. I mean, for me, that is the most, I strongly dislike Facebook in many, many, many, many different ways. But the PDF accessibility Facebook group is by far the most helpful and most useful resource when it comes to questions like basic questions. Obviously if you've got huge problems, then there are resources like Chad's company and other vendors, but we know Chad and Dax very well. But when it comes to helpful, the PDF accessibility Facebook group for me is the place where I hang out and learn a lot of stuff. I don't usually ask that much because I don't do remediation, but that's the place to go. By far the best resource there is

Will ([00:53:41](#)):

For somebody who doesn't have Facebook. So I don't know. I don't have any comment on that, but usually you can send the file and we can tell you what is the issue and how to resolve it, and that's not an issue at all. For us, I don't use anything. It's just experience is more than anything else. I refer to Adobe and the help button there and see how can we resolve the issue. And also we need to check that, is the solution that we provided in this PDF actually working? So trial is an important thing here. And as I said, not everybody has Facebook to check this group, but it's good to know that there is one there.

Guy ([00:54:29](#)):

Exactly. It is one of the only reasons I am still on Facebook.

Chad ([00:54:34](#)):

Agreed. Yeah.

Guy ([00:54:37](#)):

For all other purposes, I would rather not be on it, but yeah, anyway.

Chad ([00:54:51](#)):

Yeah, and I'll just add, if you're looking for a resource to learn PDF accessibility, I could recommend LinkedIn Learning. I have a couple of courses on LinkedIn Learning where you can just go there and watch the course at your own leisure. So it all depends on what you're looking for. If you're looking for

the answer to a specific question, Facebook group's a great place to go. I might answer your question in the course, but the course is a little more generic in nature.

Guy ([00:55:29](#)):

I think just looking at the, I'm not going to try and pronounce the name, but the last question that came in from the chat I think is a very relevant question. What would be the steps to raise an exception with the EU for EPUBs? I don't know if you even would know that

Will ([00:55:46](#)):

Every country have its own commission and you can discuss that. You can write to the commission and they will give you the answer there. So it depends whether your publisher is based in Ireland, in Germany, in France, and so on. By contacting them, you can get that answer that you're looking for. Sorry.

Guy ([00:56:10](#)):

Go ahead. Sorry, I thought you were done. I didn't mean to interrupt.

Will ([00:56:13](#)):

No, no, it's okay. Go ahead.

Guy ([00:56:15](#)):

I was just going to say, I think that's one of the downsides of the European Accessibility Act is that it originates from Brussels in terms of that's where the EU is hosted. A whole bunch of countries voted on it and ratified it, but individual details on the implementation as well as the enforcement of the rules is country specific. So Ireland, I think you showed that in your slides. Some countries give you a fine, some countries will throw you in jail. It depends on the country. So there's not really, I think that's one of the little bit of a downsides to the EEA.

Will ([00:57:04](#)):

It's not the downside. It's a good side, put it this way.

Guy ([00:57:09](#)):

Yeah.

Will ([00:57:11](#)):

The second part of the question, let me just read from Rajkumar, basically, look, the EAA has been here since 2019. If somebody just woke up now to say, oh, what do I need to do if we cannot comply by June 28th, 2025? It's a big issue. What I would say, have you done anything yet? Have you started making any of your titles accessible, a hundred percent compliant with the EAA by June 28th? Have you checked with your commission what was going to happen? I mean, if you have a plan, you can produce a plan, for the commission to say, look, this is my plan. I'm planning to complete a hundred title by the end of the year. We've already done 10 and we're working on the rest, et cetera. That should be okay because you're showing a good faith, and I don't think the commission will fining you or putting you in jail. But if you haven't done anything yet, then this is a big issue that you have, need to start thinking fast about what you need to do here. I'm working with publishers that, they just want to get certification before they're doing any EPUBs, and I said, no, first we start making your content accessible, and then you can get the certification afterwards. The EU certification can come after you already made your content accessible, but you cannot just work on certification to say, I have a certification. That doesn't prevent you being

sued or being fined for not making your content accessible. So every business is different. As I say for the example, in the UK, we have Taylor Francis, they've been making their content for the last five, six years. They haven't even waited till the deadline of the EAA. They already making their content.

(00:59:13):

There's a lot of publishers that I work with in the US they're making their content fully accessible. It's not just because of the, also because of the Americans with Disabilities Act as well. So I don't think the act, one of the questions I have been asked recently is, do you think the ADA Title II will be cancelled? Or do you know if they're not going to follow the judgement ? Even if they've done that, you can still be sued in a civil court for not making content accessible. So every state will be able to sue for not, you're discriminating against someone just because of their disability. And that is, we don't have that culture in the EU, but that can happen in the US. Are we going to take any more question or...?

Lukas (01:00:14):

I don't see any new ones in the chat, and we are at time, so I think we can wrap it up.

Will (01:00:22):

Thank you everyone.

Guy (01:00:23):

Thank you Will.

Lukas (01:00:24):

All right. Thanks guys. I will send this recording out tomorrow. Alright, have a good day. Thanks everybody.

Will (01:00:31):

Thank you everyone. Thank you. Thank you. Bye-Bye.

Guy (01:00:33):

Byebye.