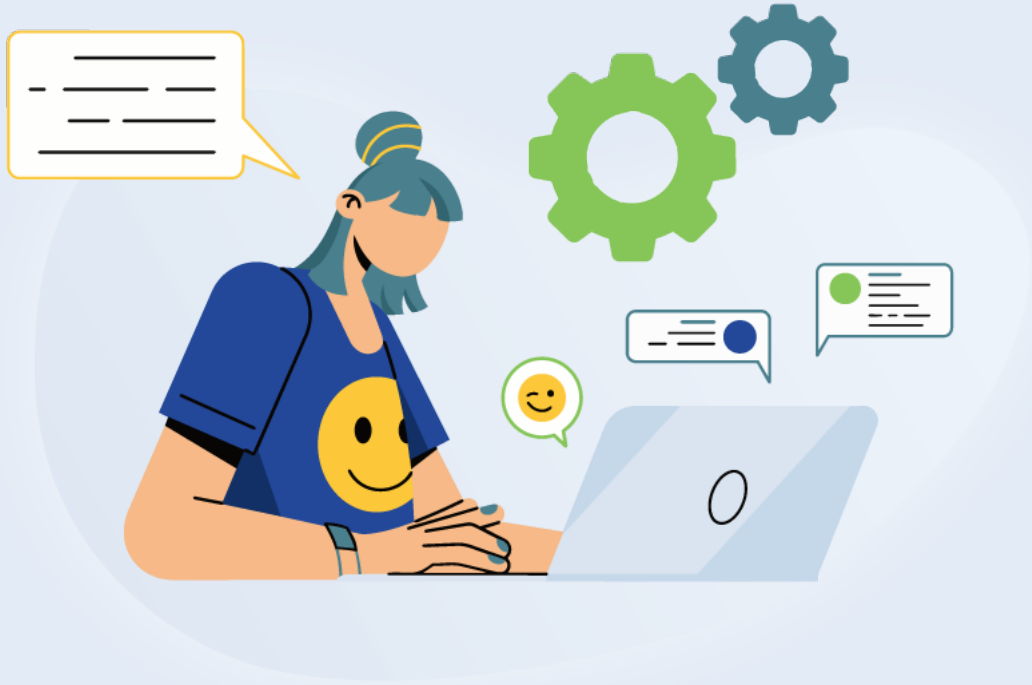
WORKSHOP

EU-China Workshop on E-Accessibility



From Policy to Practice: Third-Party Testing for E-Accessibility

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Organized by:

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Five Key Questions

01 What e-accessibility means and why it matters

02 What is changing in Europe and in China

03 How these requirements are translated into standards

04 How does TÜV Rheinland China support accessibility in practice

05 What we can expect in the coming years

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Equal access to ICT, digital products and services

> E-accessibility means ensuring that **ICT, digital products and digital services** can be accessed and used by **persons with disabilities** on an equal basis with others.



Persons with disabilities

Users whose access needs the framework is designed to serve



ICT and digital products

Hardware, software and other digital technologies



Digital services

Services delivered through digital channels

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It is broader than web accessibility

Web accessibility

Websites and mobile applications
The classic scope of accessibility work

E-accessibility

The same scope, plus hardware, software and other digital technologies

As everyday life becomes digital, inaccessible products create barriers in:

- Communication
- Employment
- Education
- Information
- Public services

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From good practice to a structured framework

E-accessibility is no longer only a voluntary commitment

01



Legislation and policy

02



Technical standards

03



Testing and evaluation

04



Conformity assessment

05



Market surveillance

> This transition can be seen in both Europe and China.

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The European Accessibility Act sets the baseline

One of the most important recent developments at EU level

Directive (EU) 2019/882

European Accessibility Act
The EU-level instrument for accessible products and services

- Improve accessibility for persons with disabilities
- Support the functioning of the EU internal market by reducing differences between national requirements

E-accessibility is no longer limited mainly to public-sector websites. It extends to a much broader range of products and services used in everyday life.

Source: Directive (EU) 2019/882 (European Accessibility Act)

The EAA covers multiple domains of everyday life

Products and services within the scope of the directive

- Computers and operating systems
- Smartphones
- ATMs, self-service terminals
- Telephony
- Audiovisual media
- Passenger transport
- Banking
- E-books
- E-commerce
- Emergency communications

> It also includes requirements for access to emergency communications, including 112.

Source: Directive (EU) 2019/882, scope of covered products and services

The EAA sits inside a wider European framework

Alongside the EAA, other EU instruments form the regulatory basis

European Accessibility Act

Accessible products and services across the single market

Web Accessibility Directive

Accessibility of public sector websites and mobile apps

European Electronic Communications Code

Electronic communications networks and services

Audiovisual Media Services Directive

Audiovisual media services across the European Union

> Together these instruments provide the regulatory basis, while technical standards translate the requirements into practical and testable criteria.

Source: Directive (EU) 2019/882 · Directive (EU) 2016/2102 · Directive (EU) 2018/1972 · Directive 2010/13/EU

EN 301 549 turns regulation into testable criteria

The bridge between regulatory requirements and practical testing

EN 301 549

Accessibility requirements for ICT products and services

It provides technical accessibility requirements for software, websites, mobile applications, hardware and other ICT products and services.

- User interface accessibility
- Keyboard operation
- Non-visual access
- Captions
- Audio description
- Assistive technology support

Source: EN 301 549, Accessibility requirements for ICT products and services

EN 301 549 v4.1.1 moves to WCAG 2.2

Published in September 2026 — the most significant change in the new version

WEBSITES, SOFTWARE, DIGITAL DOCUMENTS

WCAG 2.1 → **WCAG 2.2**

The reference criteria set is replaced

Nine success criteria added

New criteria cover focus visibility, dragging alternatives, target size, consistent help and authentication

Removed: the obsolete WCAG 2.1 Parsing criterion

- Focus visibility
- Dragging alternatives
- Target size
- Consistent help
- Accessible authentication

Source: EN 301 549 v4.1.1 (September 2026) · WCAG 2.2

Publication does not yet mean legal applicability

The legal reference framework is still in transition

CURRENT REFERENCE

EN 301 549 v3.2.1 based on WCAG 2.1

Remains the harmonised reference for the EAA until a formal citation takes place.

PUBLISHED, NOT YET CITED

EN 301 549 v4.1.1 based on WCAG 2.2

Published in September 2026, with an annex linking its requirements to the EAA.

NEXT LEGAL TRIGGER

Citation in the Official Journal

The step that turns publication into a harmonised legal reference for the EAA.

> The technical requirements are evolving while the legal reference framework is still in transition.

Source: EN 301 549 v3.2.1 and v4.1.1 · Official Journal of the European Union

In Europe, conformity is a documented chain

The EAA establishes a comprehensive compliance framework

01



Assess conformity

02



Prepare technical documentation

03



EU Declaration of Conformity

04



Apply CE marking



Market surveillance and enforcement

Responsibility of the Member States

> For every covered product and service, compliance must be demonstrated and documented before it is placed on the EU market.

Source: Directive (EU) 2019/882, conformity assessment and market surveillance provisions

China builds its framework from four layers

Unlike the EU's relatively centralised, Directive-based approach

01	**Legislation**	National law providing the broader legal framework
02	**Government policies**	Policy initiatives on information accessibility
03	**National standards**	Technical requirements and conformance testing methods
04	**Sector-specific initiatives**	Targeted measures in particular service areas

> The framework enables equal participation in social life for persons with disabilities and older persons, including their access to information and social services.

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2023 brought a major legislative milestone

Adopted in 2023 — the broader legal basis for accessibility in China

Law of the People's Republic of China on the Construction of an Accessible Environment

Broader legal framework

One law setting the overall direction for accessibility

Equal participation

Persons with disabilities and older persons

Information and services

Access to information and social services

Source: Law of the People's Republic of China on the Construction of an Accessible Environment (2023)

The 15th Five-Year Plan shifts to the full lifecycle

Protection and Development of Persons with Disabilities — 14th plan vs 15th plan

Dimension	14th Five-Year Plan	15th Five-Year Plan · 2026
Main focus	Addressing existing digital accessibility barriers	Accessibility across the product and service lifecycle
Scope	Building basic testing and evaluation capacity	Both physical and digital environments
Technology focus	Web and application accessibility	Digital products, smart services and emerging technologies, including AI

> The policy direction is shifting from retrofitting existing digital services towards more proactive, lifecycle-based accessibility and intelligent assistive services.

Source: 15th Five-Year Plan for the Protection and Development of Persons with Disabilities, approved June 2026 and issued July 2026

Chinese standards now reach consumer ICT products

GB/T 37668-2019

Internet content accessibility

Technical requirements and conformance testing methods for Internet content accessibility

GB/T 32632-2026

ICT terminal equipment

Accessibility design guidance for ICT terminal equipment. Published August 2026, effective March 2027 and replacing GB/T 32632.2-2016

GB/T 45395-2025

MiniApp accessibility

GB/T 46070-2025

Mobile intelligent terminal Information accessibility

China's standardisation work is expanding from web and application accessibility towards a broader range of digital and consumer ICT products.

Source: GB/T 37668-2019 · GB/T 32632-2026 · GB/T 45395-2025 · GB/T 46070-2025

In China, two tracks run at the same time

Mandatory requirements sit alongside progressive improvement

MANDATORY

In specific areas

Accessible construction and certain public-service facilities and self-service terminals are covered by mandatory requirements

GUIDANCE-DRIVEN

Across the wider market

Consumer electronics and mobile applications are driven mainly by guidance, encouragement and progressive improvement

> At the same time, China is developing its testing, evaluation and certification mechanisms for accessibility.

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Europe and China: two routes to the same goal

How the two frameworks compare on the essentials

Dimension	Europe	China
Legal approach	Centralised, directive-based (EAA)	Legislation, policy, standards and sector initiatives
Market access	Mandatory for covered products and services	Mandatory in specific areas, guidance elsewhere
Oversight	Conformity assessment, CE marking and market surveillance	Testing, evaluation and certification in development
Key standards	EN 301 549, evolving to WCAG 2.2	GB/T 37668-2019 · GB/T 32632-2026

Europe leads with a mandatory framework; China combines mandatory and progressive tracks

Source: Directive (EU) 2019/882 · EN 301 549 · GB/T 37668-2019 · GB/T 32632-2026

TÜV Rheinland China: from policy to practice

Third parties help translate policy and standards into practical implementation

Annual conference

Participating since 2023 in the annual Technology Accessibility Development Conference

Research association

Member of the Accessibility Research Association

Certification activities

Accessibility-related certification activities initiated

Color Care White Paper

Published the TÜV Rheinland Color Care White Paper

Design support

Accessibility design support services

Testing and evaluation

Products evaluated against international standards, including EN 301 549

Source: TÜV Rheinland China accessibility activities

From standard clauses to product practice

Ours previous accessibility practice

Theme	Reference	In practice
Packaging and instructions	EU 2019/882 · Annex I, Section II	Single-hand opening, braille marks, QR code to the manual
Activating accessibility	EN 301 549 · CL 5.2	Physical shortcuts and gestures switch on screen reading
Locking and toggle controls	EN 301 549 · CL 5.6	State readable by visual, touch or sound without using the control
Colour on hardware	EN 301 549 · CL 8.7	Colour never the only cue: blink patterns and spoken status
Password and numeric entry	EN 301 549 · CL 5.1.3.8, 8.4.1	No spoken password; private listening; tactile key 5

> Built around different needs — vision, hearing, speech, mobility and cognition — from design guidance through to testing and certification.

Source: TÜV Rheinland accessibility compliance practice · EN 301 549 v4.1.1 (2026-09) · Directive (EU) 2019/882

Four developments will define the next few years

Looking ahead, four developments stand out

01 **Measurable implementation**

Requirements must be defined and demonstrated — measurable, repeatable testing methods are needed

02 **Evolving regulation and standards**

Europe moves into EAA implementation as EN 301 549 evolves to WCAG 2.2; China's legislation, plans and standards continue to develop

03 **Mainstream and emerging technology**

AI, smart devices and multimodal interfaces create new opportunities as well as new questions for standards, design and evaluation

04 **Stronger cooperation**

Governments, standards organisations, industry, users and third-party assessment bodies each have a role

> The direction is consistent: from defining requirements to demonstrating that products and services actually meet them.

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