



SIXTH FRAMEWORK PROGRAMME

# Support-EAM

Supporting the creation of an eAccessibility Mark

An investigation into the possibility  
to create an eAccessibility Quality Mark  
for Web services

## Specific Support Action

Information Society Technologies

6th Framework Programme

Project/Contract no. : IST-2-004754-SSA

[ Update: 12 February 2007, Support-EAM ]



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## Executive Summary: The findings of the Support-EAM project

Since 2001, e-Inclusion has become a key objective of the overall European Social Inclusion Strategy. The European Community has established objectives towards e-accessibility within the i2010: "[A European Information Society for growth and employment](#)". Concerning Web Accessibility particularly, guidelines have been formulated by the W3C which are recognised worldwide: the [Web Content Accessibility Guidelines \(WCAG\)](#). In reality, several studies have evidenced that the WCAG are quite poorly implemented, like [the one published by the UK Cabinet Office in November 2005](#).

In this context, certification is one of the instruments that are considered as having a potential for improving the current situation, and supporting the legislations that mandates accessibility (read the [Communication on eAccessibility from the Commission \(13 September 2005\)](#) to the Council, the European Parliament, the Economic and Social Committee, and the Committee of Regions ).

In several countries this assumption is supported by the experience of non governmental organisations which have created conformity labels based on the WCAG guidelines. Among other, [AccessiWeb](#), [AnySurfer](#), [Drempelvrij.nl](#), [Sello de Accesibilidad](#), [See it Right-Usability](#) can be mentioned. These labels are based on private agreements between service suppliers wishing to demonstrate the quality of their products and reinforce their public image, and organisations being accountable of technical verification for which the suppliers have not the expertise. These initiatives have improved the clarity and the transparency in the attribution of accessibility labels and have contributed to make accessibility recognised as a necessary component in the development process.

Nevertheless, the success of these labels raises the question of a real control of their quality and their harmonisation. If this question were not solved, any policy for a large-scale implementation of the W3C WCAG would be difficult, due to their fragmented interpretation. In this context, the Council of Europe stated in 2003, that a Quality Mark for eAccessibility should be set up, and the European Commission recommended certification as an instrument for fostering eAccessibility, in the Communication released on 13 September 2005 (read [Council Resolution on eAccessibility \(doc. 5165/03\)](#) - improving access people disabilities to Knowledge Based Society). A [mandate to European standardisation bodies concerning eAccessibility](#) was released in December 2005 by the European Commission.

The [Support-EAM Specific Support Action](#) was set up on the basis of the Council Resolution on eAccessibility. Indeed, it was set up in order to explore the possibility to create an eAccessibility Quality Mark for Web services, as part of the Action Plan eEurope 2005: An information society for all.

### The three main objectives of Support-EAM were:

- to harmonise the methodologies used for evaluating Web Accessibility (single-site or large-scale) and validate it with experts from two other IST projects, namely BentoWeb, EIAO, which constitute the WAB Cluster (Web Accessibility Benchmarking) with Support-EAM.
- to recommend requirements for a Web Accessibility certification scheme.
- to disseminate results over Europe.

## The main results of Support EAM are:

- an Unified Web Evaluation Methodology ([UWEM 1.0](#)) has been developed to assess the accessibility of Web sites against the recommendations of [W3C/WAI](#).
- a [CEN Agreement \(n° 15554\)](#) on "Specifications for a Web Accessibility Conformity Assessment Scheme and a Web Accessibility Quality Mark" has been published.
- an [online curriculum on Web Accessibility evaluation](#) has been developed and published.

**Note 1:** Support-EAM is a Specific Support Action (contract number 004754) co-funded by the INFSO DG of the European Commission within the RTD activities of the Thematic Priority Information Society Technologies of the 6th Framework Programme. It was conducted by organisations from 7 countries, and coordinated by the association BrailleNet, France, from October 2004 to July 2006.

**Note 2:** the 7 Support-EAM partners are:

- [Association BrailleNet](#) (France) Coordinator
- [Technosite](#) (Spain)
- [Bartimeus Accessibility Foundation](#) (Netherlands)
- [Dublin City University](#) (Ireland)
- [Universität Linz](#) (Austria)
- [Katholieke Universiteit Leuven Research & Development](#) (Belgium)
- [AccessInMind Ltd](#) (United Kingdom)

## 1) Two conformity assessment schemes

### 1.1) Certification

Product and service certification is a standard procedure for guaranteeing that a product or a service is in conformance with requirements specified in a norm or a normative document, on an objective basis. Certification is a voluntary action undertaken by providers that outsource the necessary operations to a third-party organisation, called certification body, in order to bring guarantees to customers and users. The certifying organisation uses inspections, that they carry out themselves or with help of external organisations. The guaranty covers a certain duration. This guaranty is often associated with a Certification Mark in order to make it more visible.

Product and service certification and the related procedures are defined in standards such as ISO/IEC Guide 28:2004, ISO/IEC Guide 65, ISO/IEC 17020:1998. The certification body shall be competent, respect impartiality and transparency. It is accountable for what it certifies. It shall also insure that normative documents are valid and accepted by stakeholders. If needed it shall organise their update with the parties concerned.

In many domains, service certification has proven to be an efficient instrument helping companies to build up confidence with their customers and improving their competitiveness.

## 1.2) Supplier's Declaration of Conformity

In order to alleviate control procedures and reduce the costs another conformance certification system has been set up by companies, based on Supplier's Declaration of Conformity (SdoC). Suppliers may decide to adopt this scheme if they are convinced that their image and expertise are good enough to allow them to save the cost of third party-certification. They remain accountable for their declarations. SdoC shall be complemented by market surveillance and respect the ISO/CEI 17050. This approach has been successfully applied in several sectors like telecommunications or electrical goods.

## 2) A demand for Web Accessibility certification

The Support EAM has conducted two on-line digital surveys where a wide spectrum of stakeholders expressed a need for a certification scheme:

- survey *Stakeholders needs for a Quality Mark* was conducted from February 14th to March 15th 2005 (D3.2 Support-EAM deliverable).
- survey *Stakeholders needs for a European Authority* was conducted from 1st of February to the 5th of March 2006 (D3.5 Support-EAM deliverable).

### 2.1) Stakeholders needs for a Quality Mark

The survey *Stakeholders needs for a Quality Mark* was conducted from February 14th to March 15th 2005 using 33 questions on wishes and opinions about accessibility of websites and a possible Quality Mark to support Web Accessibility in Europe. 450 answers were recorded from which 401 were considered as valid. The respondents were from more than 20 countries, representing a great variety of stakeholders with a strong representation of public organisation (58% of 263 non-commercial respondents) and Web sites' owners or Web designers (87% of 148 commercial respondents).

In spite that further investigation would be necessary to ascertain some of the answers collected, this survey clearly confirmed that Web Accessibility is raising more and more concrete concerns in Europe, and that the stakeholders are prepared to examine seriously the different parameters involved in a quality process related to e-accessibility, including the technical and financial ones. The results definitely highlight the needs for clearer communication on Web Accessibility and the set up of a methodology and a verification process to put into concrete the WCAG:

- 80% of respondents pay attention to Web Accessibility of their sites but only 35% have checked it: most people know of Web Accessibility but have no clear ideas of what to do.
- 75% of respondents want methodology and criteria.
- 80% of respondents think that to get a Quality Mark for their Web site is necessary before acceptance from their site builder: the Quality Mark is seen as a security and quality issue.
- Stakeholders also consider that a Quality Mark for Web Accessibility would improve the image of the owner of the website (81%) and trust the accessibility of the Web site (84%). They think that an accessible Web site reaches a larger audience and therefore increase the Return On Investment (70%).

- 72% of the respondents have a budget for accessibility. Furthermore, 34% of them are willing to pay for an ongoing evaluation of their website. Among them, around 50% were even proposed an estimated annual budget for that whose average is 2200 €/year.

The full report of the study can be downloaded at : [http://www.supporteam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.supporteam.org/supporteam/About_Supporteam/Documents.asp).

## 2.2) Stakeholders needs for a European Authority

A second survey *Stakeholders needs for a European Authority* focused on the need for a European Authority for Web Accessibility Certification. It was conducted from 1st of February to the 5th of March 2006. 241 valid respondents were recorded originating from 13 different European countries. The questionnaire had 17 items. The results evidence a common opinion in Europe that third party certification is a more trustful certification method than Supplier Declaration of Conformance. For instance, when asked the question "What do you think is the most trusted certification method ?", 86% of respondents preferred Third Party certification over self-declaration (figure 1).

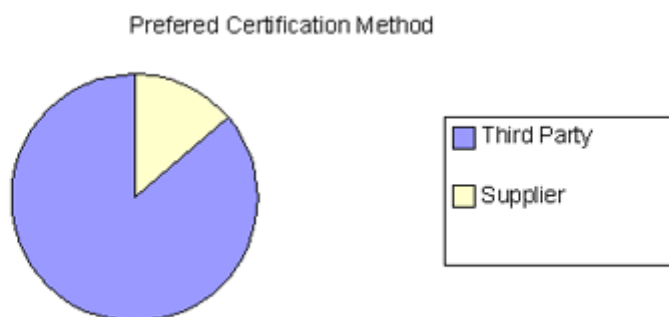


Figure 1 illustrates the preference for 3d party certification expressed by a majority of respondents.

For most respondents avoiding fragmentation of interpretation of Web Accessibility guidelines and harmonisation should be the key activity the authority. For instance, you may see the answers to the question *In your opinion, what is the most important activity of the European Authority concerning the operation of the certification scheme ?*

- Avoiding the fragmentation of the interpretation of European and W3C and other international guidelines for Web Accessibility [164 answers (68%)].
- The harmonization of quality marks [134 answers (56%)].
- Drafting a normative document setting criteria to Web Accessibility [129 answers (54%)].
- Registration of website which have been attributed the quality mark [121 answers (50%)].
- Development of a European quality mark [109 answers (45%)].
- Contracting parties issuing this quality mark [49 answers (20%)].
- Effectuating market surveillance [33 answers (14%)].

The international role of the authority is considered most important, while testing should be made by a local authority. The vast majority of respondents share the opinion that as a European Authority the best way to support an adequate quality mark is to encourage the use of objective criteria and good practices concerning Web Accessibility.

The full report of the study can be downloaded at : [http://www.supporteam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.supporteam.org/supporteam/About_Supporteam/Documents.asp).

## 2.3) Conclusion

In conclusion, both surveys show clearly that:

1. Web Accessibility is raising more and more concrete concerns in Europe;
2. third party certification is often regarded as a more trustful certification method than Supplier Declaration of Conformance;
3. avoiding fragmentation of interpretation of Web Accessibility guidelines and harmonisation should be the key activities of a European Authority; and,
4. there is a huge need for objective criteria and good practices concerning Web Accessibility.

These results confirm those of [the on-line consultation from the Europa Commission](#) open to all interested organisations and individuals to participate, in January-February 2005.

## 3) Can on-line services be certified ?

A common objection to Web certification is that Web sites are changing permanently which makes any evaluation obsolete immediately after it is completed. To that objection, several answers can be made:

- Firstly, this problem is not specific to on-line services, but rather common for many services, like services welcoming the public, elevators, touristic sites, for instance. Nevertheless, it is accepted that certification can guarantee their quality.
- Secondly, on-line services may be quite stable, like some administrative services, for instance.
- Finally, there are solutions to the problem of changeability of Internet services: the frequency of controls shall be adjusted according to the stability of the code; controls can be performed remotely and randomly, using automatic surveillance tools; the services are continuously exposed to public so that complaints can be collected in real-time. Such features make possible on-going surveillance and corrections. Several experiences of accessibility labeling scheme have taken profit of them, imposing to Web site suppliers to address accessibility issues in a limited period of time.

### 3.1) Current situation of certification in Europe

Support-EAM conducted a study on certification schemes in Europe. This study covers: general terms and definitions; the European regulatory context and its transposition in European countries; the requirements for Quality Marks; description and comparison of existing labels or Quality Marks in different domains, like the European Ecological Label, Tickit, the European Computer Driving Licence, IQNET, the CEN Keymark, the Health-On-the-Net (HON), for instance.

Finally the study identifies the essential elements of a future scheme for certification or distribution of a Quality Mark for guaranteeing the conformity of Web sites to accessibility requirements.

The report of this study is available under the title D3.1: *State-of-the-art of Certification Scheme in Europe* (date: 30 November 2005). It can be downloaded from the Web site at :

[http://www.support-eam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.support-eam.org/supporteam/About_Supporteam/Documents.asp).

### 3.2) Comparative study of existing Web Accessibility labels

Support-EAM studied the schemes and labels developed by several organisations for certifying the conformity of Web sites to the W3C/WAI WCAG requirements. This work is mainly reported in two reports:

1. *Description of Web Accessibility Quality Marks* (DWAB 3.1 Support-EAM deliverable): this report identifies seven Web Accessibility Quality Marks currently in operation in various European states, and describes each of these systematically under a common set of headings and criteria. These Quality Marks are Accessiweb, Sello de Accesibilidad, See it Right, Excellence through Accessibility Award, W-Mark, BlindSurfer, and Drempeelvrij.nl. This provides a basis for subsequent more detailed analysis of a subset of these schemes.
2. *Harmonisation framework for Web Accessibility Quality Marks* (DWAB 3.2 Support-EAM deliverable): this report presents an initial description of a possible framework for harmonised Web Accessibility Quality Mark scheme, based on the schemes studied in DWAB 3.1, and particularly the schemes run by 3 Support-EAM partners, namely [AccessiWeb](#), [Drempeelvrij.nl](#), [Methodologia Web Accessible \(MEWA\)](#). This report is concerned solely with the framework of these Quality Marks; that is, the general principles of operation, contractual arrangements, qualifications of auditors etc. It is specifically not concerned with the detailed criteria or tests of accessibility used in each scheme. This is an attempt at harmonisation in the sense that the different schemes listed above are already generally "compatible" with it.

These two reports are part of the report DWAB3: Evaluation of UWEM 0.5 delivered as a contribution to the WAB Cluster activity. All these reports can be downloaded from the Web at : [http://www.support-eam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.support-eam.org/supporteam/About_Supporteam/Documents.asp).

## 4) Methodology for assessing conformity to the WCAG

### 4.1) Requirements for a normative document

Normative documents shall provide precise criteria and methods making possible to verify them on an objective basis. They allow for the characterisation of the services to be controlled. They can refer to a technical norm, or to widely accepted recommendations. In addition to technical specifications, normative documents specify how to inform customers and users about the conformity assessments and the guaranties that are given, and – possibly - commitments concerning the service and reparations made in case of non-conformity.

Concerning Web Accessibility, no international norm exists. But the WCAG are officially recognised by European countries. Thus, a normative document for Web Accessibility certification should be based on these recommendations.

National organisations have undertaken the adaptation of these recommendations into national reference documents, norms, or technical rules for implementing the laws. One can mention, for instance :

- Spain : Norm developed by AENOR : "Requisitos de Accesibilidad para Contenidos en la Web", UNE 139803:2004.
- France : AccessiWeb, developed by BrailleNet, submitted to public comments in 2003 and incorporated in the interoperability reference documents of the administration in 2004.
- Italie : Decree of 8 July 2005 « Requisiti tecnici e i diversi livelli per l'accessibilità agli strumenti informatici » ( technical rules) published in the Official Journal n. 183 8 August 2005.
- The Netherlands : Normative Document Drenpelvrij prepared by a normative commission.
- United-Kingdom : « PAS 78: Guide to Good Practice in commissioning Accessible Websites », developed by BSI British Standards.

Nevertheless, nor the WCAG, nor the national adaptations, can constitute by themselves the technical reference for certifying a Web site, because they do not contain methods for deciding the conformity on a uniquely interpretable, repeatable basis. This is why the various labeling schemes have had to create their own documents in order to make their assessments as objective as possible.

Thus, Support EAM explored the possibility to develop a methodology for expert reviews, based on existing methodologies.

## 4.2) Methodology for expert reviews

Support-EAM has developed a process for collating and merging three different methodologies, all based on the W3C/WAI WCAG, checking their coherence with the W3C/WAI work, within the WAB Cluster. These methodologies are those currently used by three organisations involved in Support-EAM, namely Accessibility Foundation Netherlands (ACC), Association BrailleNet (BNET) and Fundosa Teleservicios (TSERV). The result is a methodology for expert reviewers which is described in a document numbered DWAB3.5-1, that can be downloaded from the Web at : [http://www.support-eam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.support-eam.org/supporteam/About_Supporteam/Documents.asp).

This is an important contribution to the harmonisation work undertaken by the [WAB Cluster](#) towards a Unified Web Evaluation Methodology ([UWEM](#)). Then Support-EAM took an active part in the evaluation of the Unified Web Evaluation Methodology, examining how the UWEM could be applied for creating a Web Accessibility Conformity Assessment scheme, in coherence with the existing schemes run by the Accessibility Foundation Netherlands (ACC), the Association BrailleNet (BNET) and the Fundosa Teleservicios (TSERV). These concrete provisions were incorporated into the [UWEM version 1.0](#), which was designed to support a Normative Document supporting certification.

## 4.3) Prototype Demonstrator

A demonstrator illustrates how the Unified Web Evaluation Methodology can be applied by expert reviewers in the frame of a labelling scheme. This demonstrator is a Web application (figure 2) and php files can be downloaded online at : [http://www.support-eam.org/supporteam/About\\_Supporteam/Documents.asp](http://www.support-eam.org/supporteam/About_Supporteam/Documents.asp).

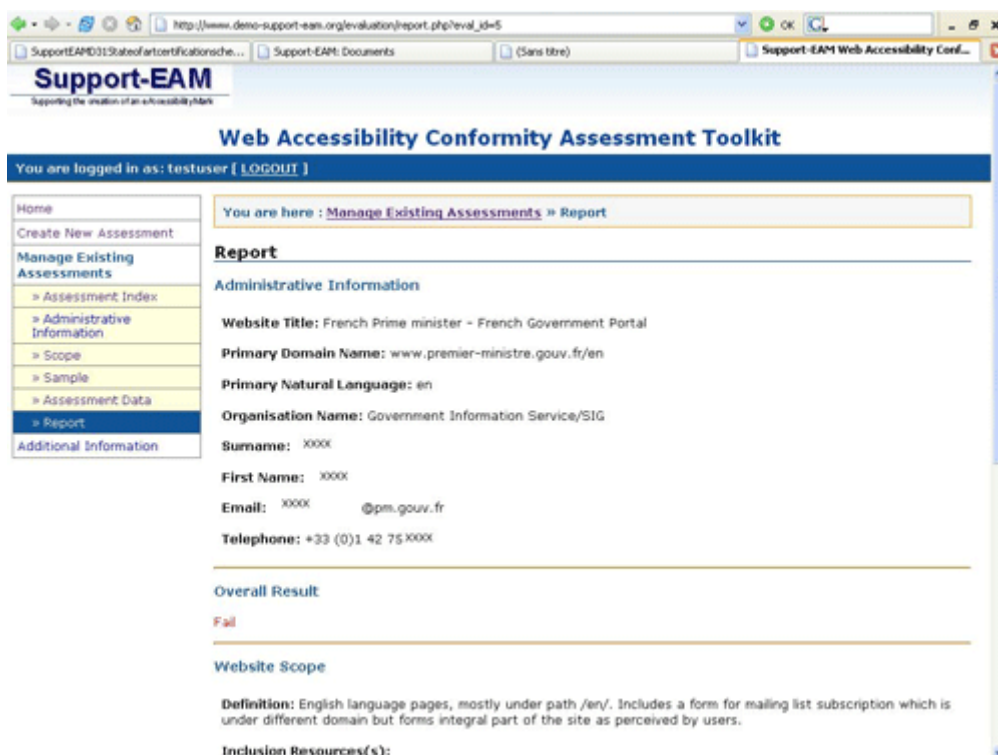


Figure 2 : Support-EAM Demonstration of the assessment of a Web Site by expert reviewers

## 5) Specification for a Web Accessibility conformity assessment scheme and a Web Accessibility Quality Mark

### 5.1) CEN Workshop Agreement

Support-EAM launched and conducted a CEN Workshop which produced a CEN Workshop Agreement (CWA n° 15554:2006). This agreement has been published by the [CEN](#) as a first level European agreement on how standard conformity assessment schemes commonly used in Europe can apply to Web Accessibility conformity assessment. This CWA can be downloaded from the CEN Workshop Web site at:

<http://www.cenorm.be/cenorm/businessdomains/businessdomains/iss/cwa/design+for+all+in+ict.asp>.

This agreement reflects three types of demands that were identified, namely supplier's declaration of conformity (according to ISO/IEC 17050), inspection (according to ISO/IEC 17020) and product certification (according to EN 45011) (Figure 3). Supplier's declaration of conformity is supported by industry groups like EICTA, while inspection seems very close to the existing labelling schemes. The agreement also proposes a reasonable way for existing labelling schemes to improve and to harmonise.

An important recommendation of this workshop is the creation of a central European institute whose mission is to organise, harmonise and control practices in liaison with international bodies concerned. The activities proposed to the institute concerning the operation of the scheme are:

- avoiding the fragmentation of the interpretation of guideline the harmonisation of Web Accessibility Quality Marks;
- rafting a normative document setting criteria to Web Accessibility, in line with the adopted version of the W3C/WAI WCAG;
- development of the web accessibility Quality Mark;
- establishing agreements with parties issuing the Web Accessibility Quality Mark;
- registration of websites which have been attributed the Web Accessibility Quality Mark;
- effectuating market surveillance;
- creating an active dialogue with user groups.

The discussions that conducted to this agreement are reported in details in the deliverable D3.3 “Editing Work for the CEN Workshop” that can be downloaded from the Web at : [http://www.support-eam.org/supportteam/About\\_Supportteam/Documents.asp](http://www.support-eam.org/supportteam/About_Supportteam/Documents.asp).

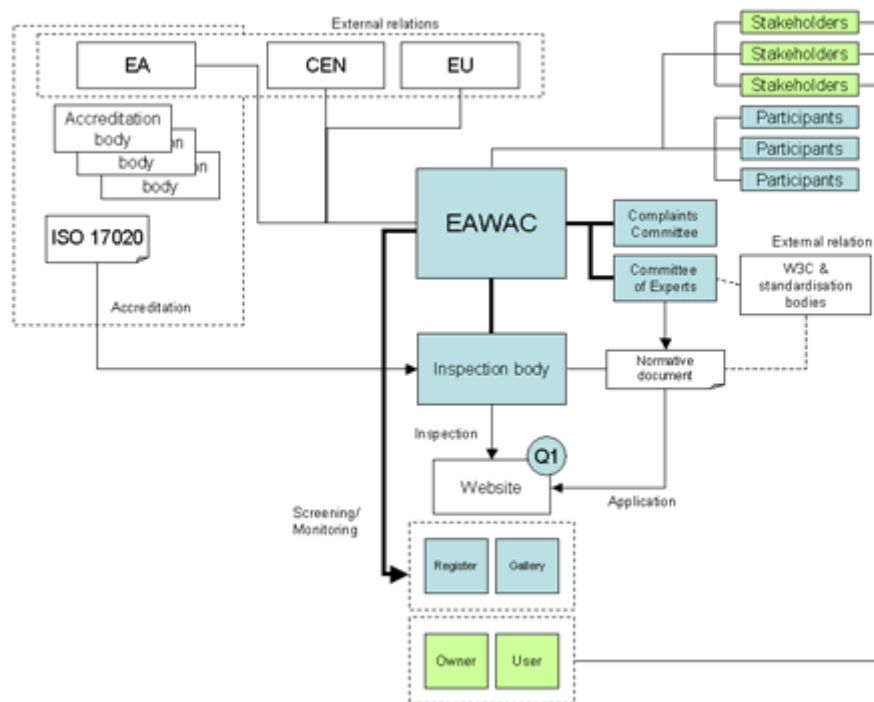


Figure 3 illustrates one possible scheme for certifying the conformity of a Web site to accessibility specification based on third party inspection

## 5.2) Strategy for Implementing a Web Accessibility conformity assessment scheme

Based on the different studies already mentioned, the Support-EAM project proposes a strategy for implementing the recommendations of the CEN Workshop. This strategy is coherent with the experience of partners in various countries, including those where labelling schemes are in operation. It is organised in 6 major steps :

1. Creation of an institute for Web Accessibility Conformity Assessment ;
2. Preparation of a Normative Document;
3. Creation of a Web Accessibility Quality Mark and adoption of a convergence plan of the different labels towards this mark;
4. Establishing agreements with organisation willing to use the mark;

5. Cooperation with the standardisation bodies;
6. Developing services supporting the Web Accessibility Quality Mark.

The project elaborated a concrete documentation for helping people in the creation of such a scheme, like:

- Statutes of an institute for Web Accessibility Conformity Assessment
- Model of an agreement binding the institute and organisation willing to use the mark
- Conditions for the implementation in different countries
- Information on Local conditions for certification in the Country
- Accreditation bodies, Certification Bodies operating service certification, Certification process
- Laws / regulations concerning the protection of consumers, Legal obligations concerning e-accessibility
- Successful experiences, Existing certified services , on-line services, concerning of accessibility services for disabled persons; Existing labels for Web Accessibility
- Possible migration plan for the existing labels
- Potential key constraints; possible barrier to convergence: property rights, involvement of stakeholders, national regulation bodies, ...

The description of this strategy for implementing a Web Accessibility conformity assessment scheme and the supporting documentation are compiled in the report *CWA Implementation Plan* (D3.4 Support-EAM deliverable).

## 6) Harmonised Training for Expert Accessibility Reviewers

Support-EAM has developed a Curriculum and contents for training expert reviewers, as a proof of concept. The objective is demonstrate that it is feasible to provide a unified training resource for people willing to assess websites against an evaluation methodology that has been harmonised at a European level and in the context of Web Accessibility certification. Basic knowledge about Web Accessibility in general and evaluation of website accessibility in particular is assumed for a good understanding of this Curriculum. Thus, this basic knowledge is not to be taught in detail in the Curriculum. However an overview and some useful links are provided where appropriate.

The curriculum is divided into 4 modules:

- Web Accessibility in Europe
- How People with Disabilities use the Web
- Evaluation Methodology
- Web Accessibility Validation Scheme and Quality Mark

Where reasonable and appropriate, a section called "Self-evaluation" (containing theoretical questions) and a section called "Exercises" (containing practical tasks) have been added. These sections give the reader the possibility to verify his/her knowledge and his/her understanding of the contents he/she has just learned.

The Support-EAM Curriculum (Figure 4) is available on-line in 5 languages, namely Dutch, English, French, German, and Spanish, at : <http://www.support-eam.org/waac/en/index.html>. A [disclaimer](#) must be read before any use of this curriculum.

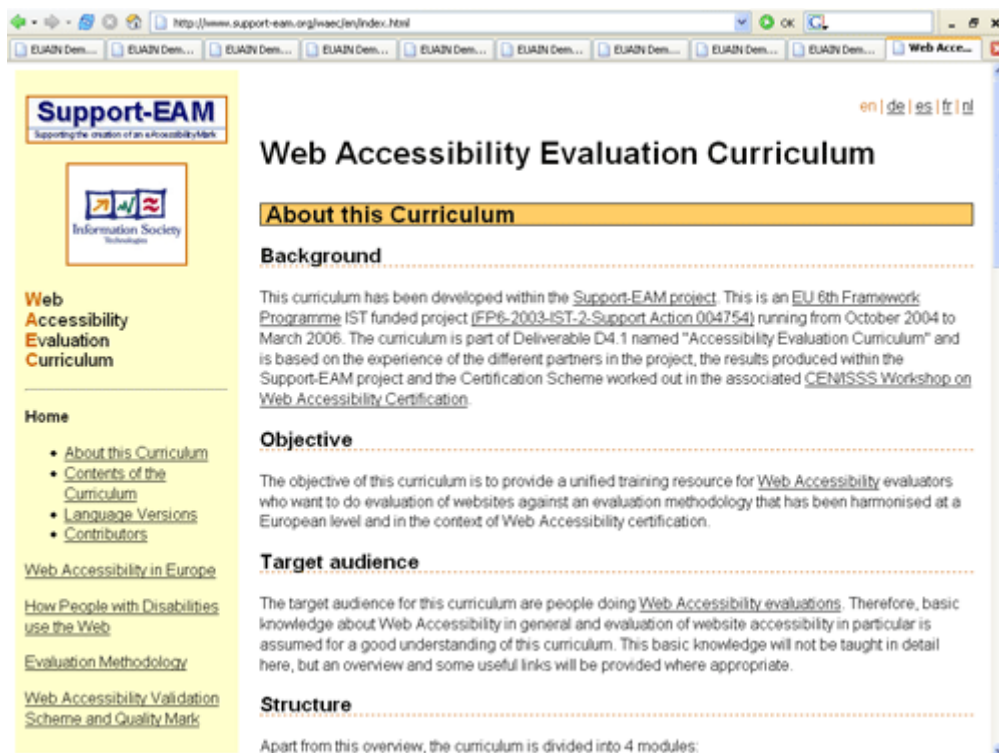


Figure 4: Support-EAM Curriculum home page.

## 7) Conclusion

Users' and consumers' organisations, industry and governments agree that the accessibility of technology is a significant and relevant issue that shall be addressed seriously and coherently.

Accordingly, in its Communication on eAccessibility, September 13th, 2005, the European Commission proposes a set of policy actions that should foster e-accessibility. It calls on Member States and stakeholders to support voluntary positive actions to make accessible ICT products and services far more widely available in Europe. It mentions certification as an instrument.

All see the accessibility of technology as a large-scale problem concerning many business domains and hitting a growing potential market. They consider that regulation, standards, e-procurement and some forms of recognized certification should help towards a society more beneficial to all citizens, matching the ethical objectives of democracies.

Also the work done by the W3C under the Web Accessibility Initiative is recognized as a basis for building up Web Accessibility, particularly the WCAG.

At the end of the year 2005, an EC mandate has been given to the European Standardisation Organisations to come with a solution for common requirements and conformance assessment.

This context is encouraging the creation of a certification system for Web Accessibility designed to work at European level. The experiences that organisations have conducted in several countries over the past few years constitute a favourable basis for that.

The creation of an institute would offer an opportunity to bring together competences and energies, and stop the fragmentation into multiple schemes, whose paradox would be to make any further progress towards accessibility difficult in Europe.

The work undertaken by Support-EAM and the CEN Workshop clearly show that such an authority could integrate different existing schemes supporting voluntary certification and serving the interest of all the parties concerned. This authority would make collective expertise visible and provide a space where to develop it and improve it collectively. Organisations having a solid experience in labelling Web sites should constitute the core of this authority that should also take on board all the interested stakeholders, in order to capitalise the lessons from different experiences, which have produced a real expertise that should be promoted at European level.

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