# Lessons Learned in the Journey to Accessible Publishing – webinar transcript

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- [Richard] Hello everyone and welcome to this DAISY Consortium webinar titled, "Lessons Learned in the Journey to Accessible Publishing." Okay, let's get started. If you encounter a challenge on the road to accessible publishing, chances are you are not the first. In this session, we'll reveal the issues that arise again and again and hear how they're being addressed by companies as they get ready for the European Accessibility Act. Well, we are fortunate to be joined by some experienced travellers on the accessibility journey. So to get things moving, I'll ask them to introduce themselves.   
- [Cristina] Hi everybody, I'm Cristina Mussinelli. I'm the Secretary General of Fondazione LIA who is an organisation creator of Italian Publisher Association and Italian Blind Union.   
- [Simon] Hi everybody, I'm Simon Mellins. I'm the Ebook Technical Coordinator at Penguin Random House. So I look after our ebook tech and specs and at the moment, largely accessibility.   
- [Wendy] Hi everyone, I'm Wendy Reid. I'm from Rakuten Kobo where I'm the accessibility and Publishing standard suite. I'm also chair of the EPUB Working Group and I spend most of my time thinking about accessibility and reading systems.   
- [Anne] Good afternoon, I'm Anne Bergman-Tahon and I'm the director of the Federation of European Publishers. We gather 29 publisher association books, journals and learn-it content from all over Europe.   
- [Richard] Well, I'll quickly provide the overview of what we'll cover in the next 30 minutes or so. And we'll start the session with a high level overview of publishing and the European Accessibility Act. Cristina will then speak about collaboration, strategy and training. Simon will share the biggest challenges from a publisher perspective and then we'll hear from Wendy with lessons from distribution and retail. After our panellists have presented, we'll cover as many questions as possible in the remaining time. We've a lot to pack in, so I'm delighted to hand over to Anne.   
- [Anne] Thank you Richard. And I want to say thank you to DAISY Foundation for inviting the Federation of European Publishers to speak. Been asked to give you a high level overview, so I'm gonna try to stay as high level but as understandable as possible. So this is, I'm well aware that there has been a lot of cooperation at national level for many, many years, but the EU is a slightly different animal and it was really in the early 2000 that publishers and specialised organisations started to gather and discuss at EU level to see how we could improve the accessibility of print publication. We started with an organisation that was called ETIN, which stood for European Trusted Intermediary Network, and we had in memorandum of understanding an access for print disabled person in Europe in the year early, as I said, early 2000. But then thing relatively stopped at Europe and level, but they moved on at international level with the Marrakesh Treaty, which was signed 2014 and which was implemented in the European legislation in 2017, entering into force in 2018. So this is a couple years ago and I suspect some of the member states have improperly implemented Marrakesh but that still the effects of the treaty is now applicable to European citizens. Directly after Marrakesh, the EU came up with the European Accessibility Act, which is much broader than just eBooks or ereaders and that covers a multitude of product and services. The European Accessibility Act went relatively fast and was adopted in 2019. However, because of the level of complexity into making it applicable in member states, it enters into force in 2025. The European Accessibility Act, well, actually there was a first impact assessment in 2019 and that impact assessment looked at eBooks and ereaders and what it would take to make those accessible. There was discussion whether it should cover eBooks and ereaders as well as eretailers obviously, and it was clear from the publishing community that this was important although it's less than easy and I think that the colleagues after me will will amply document that, we thought it was really important that all public would've access as much as possible to eBooks. We have to be ready by the 20th of June, 2025, this is the deadline to be ready, although there maybe some exception. There's actually, there are exception within the directive for publishers, there's exception for micro publishers, so that's publishers with less than 10 staff members and limited turnover. There's also an exception for works for which accessibility would carry a too large of a burden or would, oh, sorry, but would change actually the content. All that is listed in the directive as well as the criteria for accessibility. So if you haven't done so, I would recommend you read the directive or if you publishers, you can join a working group and we will guide you through the directive, which isn't always easy. A big achievement from the publishing sector was that the commission normally mandates standardisation exercise so that all suppliers work on the same basis with the same standard. However, as we had an industry format within the publishing industry, we were able to convince them that this is deemed to fulfil the specification of directive and therefore publishers properly using EPUB 3 because I'm always corrected by people by saying that you have to use it correctly. Obviously they will have actually fulfilled their obligation. There's a number of issues that we are discussing within the FEP, is the issue of the back \list, there's an enormous number of eBooks which needs to be made accessible and we have to find ways or we have to work with specialised organisation. Whether the retailers are liable for the content and not just for the services they provide, what type of digital rights management we are using, et cetera. I think that all that will be solved or in the process of being solved in the coming months. But I just want to finish in this very, I mean this is really the European accessibility discussion in nutshell, but to tell you that for publishers, when we were asked by some members of parliament whether we wanted to have the eBooks covered or not, we all agree that accessibility is making the books we publish better and it's important for more and more publisher. And this is not just important because we have a legislation, but it's also important because it satisfies our customers and it broadens our readers quite considerably. This is a complicated journey and it's a different journey for each publisher. It depends of course on the size, and we'll have a very large publisher speaking after Christina, but also on whether the productions is made in house or is outsourced, and of course the genre of the book will really create a difference for the publishers in the accessibility level that they can reach. And with that, I am passing the flow to my friend and colleague Cristina.   
- [Cristina] Thank you very much Anne. As I explained before, we are a strange organisation because we have been created by the collaboration of the publishing industry and the organisation representing the disability people in Italy. We have and we start many years ago because we started in 2011 when accessibility was a very strange world in the publish industry. And since then we have created a catalogue of more than 30,000 accessible title that are born accessible and distributed in mainstream distribution channel. We started with a trade publisher, but we are now working with a lot of different kind of publisher, we work with academic textbook, with publisher who have platform, who have reading solution and so on. So what are the lessons we learned from all this work that we are doing in this situation? First of all, that accessibility matters for many different reasons. There are publisher who moved over accessibility in 2011 more for social responsibility than for any other reason. Right now as Anne explained, there are legislation and so one main reason now is because I need to comply with a new law. But the other very important relevance of accessibility is because I want to address the need of all my possible customer. So for example, we work with an academic publisher and during the pandemic, they were able to reach new customer because their platform were accessible to everybody and this is Il Mulino with a quite important academic publisher in the Italian market. The other way that we convinced publisher to move toward accessibility was because we convinced and demonstrate them that an accessible product and service is higher quality product and service for everybody. We started with eBooks where there is no index where there are no possibility to link from the index to a paragraph or a cap chapter. And so to add this accessibility feature was to make make a book better for everyone who want to read it. And last but not least, if you create accessible content and use the metadata that will be explained later, you also improve the searchability and the CEO of your content. So these are many different reasons, some are social reasons, some are commercial reasons. I think this is another important point. Accessibility may also open you new markets, and this is one important point. The other important lesson we learn, that is impossible to achieve good result staying alone. So we as Fondazione LIA create a bridge among all the different stakeholder, so there is the publish industry, but not only the publisher but all the value chain in the accessibility act that involve retailers, library online, reading solution developer and all the actor in value chain. And this is very, very important. Now publisher more aware than the other actor in value chain. I think publisher should also involve the other actor in more strong way. We work very closely and we are part of all international standard organisation because everything we do is based on standard, and probably Wendy will provide you more information on that. The organisation representing people with disability are crucial because what you do need to be tested and decided with all of them. And the other important part of the tech companies, because to create accessible content is publisher use authoring tools, they need the content they produce should be displayed in video solution. And so also the tech company should work on that. For example, we are now trying to work a lot with Adobe because Adobe is the owner of the most used authoring tool that is not able right now to support the publisher to create fully accessible content in an easy way. I think this is another area where we need to work more and we need to learn more in the near future. The other important thing is everyone need to work together because if someone don't do its job is like a broken phone line. So if a publisher produce accessible content, they produce the metadata but then the retailer don't display them for the end user, there are no accessible title on the market. And this will be a very big problem in the future when the people will be, when the legislation will allow people to comply with the publisher or with the retailer if the title are not accessible because there is a legislation, and I think publisher don't want that this happens. The other important thing, accessibility is a culture, it's a journey. So you must consider accessibility a strategic resource and you need to involve all the company. It's not the topic of technical people only, but is a process and you need to make a roadmap and you need to create a shared value on accessibility in the company. The initial correction is not the final goal, the final goal is to have the possibility for people to access all your content, your platform and you are reading app in the same way as anybody else. So you to do this, you need to organise yourself and you need to create and implement an accessibility roadmap. You need to start maybe with more steps and then to improve and to add additional possibility and new feature. With all the publisher we worked, we started with some small pilot project but we also at the same time started creating a shared accessibility knowledge inside the publishing industry. And this is very, very important and this is my last lesson, training is key. Accessibility is quite technical, it's important to know very well what you need to do to avoid to waste time. We do a lot of training for publisher, not only in Italy but also internationally on all the aspect that are included in accessibility. So you need to train the people working on edesign and the production, but you also need to train the people in editorial staff because the alternative description is something that is editorial, is not a technical issue. You need to train the people in the commercial area because the metadata need to flow along the distribution value chain and you also need to work with your supplier because a lot of these activity are not done internally but are done by external organisation, especially when we speak about website, platform, and apps. And so this is a real key issue and what is a lesson learned that there is a short of skill in this area. So also for the young people it will be a very important and future for their career, to be an expert on accessibility will be very trendy in the next year. Thank you. I leave to Simon the floor.   
- [Simon] And hello. So thanks for that Cristina. I'm gonna talk about kind of challenges in implementation. This is really specifically from the perspective of a big publisher. I'm aware that really the challenges are different for publishers of different sizes and different content types. This comes from Penguin Random House, so obviously we're the big fish and this is a trade publishing. So this is just about how we are dealing with this at the kind of huge scale that we work at. And really we're just gonna look at the two biggest challenges, there are obviously more, but the two biggest challenges with implementing accessibility at this kind of scale, probably at all scales, are accessibility metadata, creating accurately for every book, integrating it into workflows, and of course we've got the fact that we've got two different types of accessibility metadata and then also image description, the giant elephant in the room. So how and who should produce it, balancing quality, efficiency, and cost, particularly considering the size of backlist. So I'll start with metadata. Accessibility metadata perhaps more than some other kinds really requires a particularly close degree of knowledge of the publication and makes it a unique challenge. It also needs to be integrated into ebook files as well as biblio and distribution systems. Of course among all this, we've also got to harmonise what you are displaying in the OPF and in ONIX metadata. Now, customer creation of this for title would be ideal, but in practise this can be really difficult. So who's responsible for it in a large organisation? Does that person have an overview of the content or just one part of it or one aspect? Can it really be a person at all or does this require some degree of automation? So there are some potential ways around this and I'm really only saying stuff that we've looked at. I realise this is not a one size fits all, but you can look at metadata templating, at least to some extent, crafting individual metadata for every title is really difficult as we've talked about. So some kind of templating might be more practical though not perfect. All of this cannot be at the cost of accuracy. So I'm not saying write inaccurate boiler plates, but what can we do? So accessibility features and warnings when we actually looked at them, they do tend to be fairly predictable based on content type, at least in trade publishing. Books with complex features will need specific features and warnings, but I mean we already have a separate workflow for that kind of book and I suppose that that, again, that will depend on your individual organisation, but for us that's fine. Those titles are already siloed and we can write custom metadata for those. The other thing I want to talk about is, as I'm sure other publishers have found at least, retailers are at the moment not really talking about displaying this information that's coming from on ONIX Code List 196, they're not really displaying it and they claim that's because publishers aren't providing it so it's not worth their development time. But of course publishers struggle to get budget unlocked to develop that metadata when retailers aren't displaying it, it's a chicken and egg problem. So we are really advocating for going ahead with it and just doing it anyway on the assumption that retailers like anyone else will need to meet the requirements of the EAA and any other future legislation. So the other big one is image description. I'm sure there are people who are attending this webinar who are very concerned about this at the moment, but it really is crucial part of making books accessible. Unfortunately this really is the hardest part for most publishers. Not the actual perhaps the creation of the image descriptions themselves, which is a skill but a learnable one, but really doing it in practise. For starters, just the techniques which are not fully nailed down, especially for extended descriptions, but really just the huge potential cost of doing this. And of course they're not always easy to write and they're not the same as captions, so you might come across political, philosophical, ethical sensitivities, which if you're doing any testing in this, you might see come up then the need to use neutral language and the fine line between what is technical and what is editorial text. Producing these for the entire backlist is a really enormous challenge. Now front list is one thing, one each book is under the spotlight anyway, but doing it for your entire backlist switch in the case of PRH is something like 30,000 is a really huge problem. So I'm gonna talk about a few strategies for dealing with this and once again, there is no right answer. This is just some of the options that we've reviewed and I'm sure others have looked at similar things. First of all, the obvious one which is produce in-house, have authors or editorial staff do it, they're the closest to the content and to the production chain, but it might not always be practical for time or workflow when it scaled up, not always clear really where it would sit either, so we did look into this editors and editorial assistants, generally people are very receptive to this idea but they are very busy. And they're not always that close to the specific title in question, you know, lots of people work on a book and you also need to train whoever is going to be doing it of course. Authors are very varied in the desire for involvement, you know, you do hear great stories of authors wanting to be really involved, we have had that but others might not or might be busy or might not feel confident doing it. So really you can't count on either or both having the specific skills or understanding to do it every time. That's a presumption that would be being made. Another option might be sourcing from third party specialists. There has been a boom in image description as a service. Specialists have entered this space and they are very good at what they do, there are some amazing work being done. Obviously there's a wide variation in cost, particularly when scale is taken into account, and turnaround times, and that's really determined by the size of the company that's doing the description, and also that affects their capacity. You know, not every company can take on infinite amounts of titles. So there's a difficulty in choosing at what point you have this done, you could, you know, what point in the process of producing a book would you have the images described? It could be just before ebook conversion, before final files, of course what if things change or a last minute dash. Someone may still be required to insert the image descriptions into the files, otherwise you've got to transit your files back and forth to whoever is adding the descriptions as well, so there's a question of who does that, is it the ebook conversion vendors? Is it your own production team? Or if you have it, and then an ebook team. And I'll also talk about this sometimes controversial option of having your typesetter or your ebook conversion vendor create image descriptions. Obviously this has some appeal, this is the most natural in terms of workflow 'cause they're already working on the files but it's not flawless. They are non-specialists unless they hire in which incidentally some of them are. This can carry issues with language or cultural context depending on where they're located as well as overall book awareness, you know, how much does this person, 'cause it comes down to a person at some point, how much do they know about this book that they're writing image descriptions for? They also may already be pressed for time in a tight publishing schedule, publishers are known to lean on their type setters and ebook conversion vendors. So yeah, do they actually have the time to put this in? This can also become a capacity issue if a lot of publishers take this route and don't allow enough conversion time. So spot checking really is critical if you're going to go this route, checking as many books as possible, it becomes incredibly important to make sure that quality doesn't slip. Now I'm running short time here, but I always quickly talk about future proofing 'cause I wanna make the point that accessibility measures are not solely focused on print disability but are really about enhancing a book's semantics. This is really about making books describe themselves. It's worth noting and this really can come up when you're trying to unlock budgets within companies that a properly structured EPUB with good semantic tagging and metadata really is the best way to archive a book. Transforming into any future format accessible author-wise is gonna be easier if you've just got great EPUB. But also think about it as as really storing your books for the future, the intention behind everything in that book, including its structure and its metadata. Really all of this helps to build a publisher and a cultures' digital legacies. This is perhaps rather grandiose, but it's about making sure that this thing that is your book that lives throughout time is as as rich as possible. So accessibility is part of that. And with that, I believe that is now more time to hand over to Wendy.   
- [Wendy] Thanks Simon. So for the lessons from distribution in retail, I think I've come away with three major areas of learning. The first is around communication, the second is around implementing features and how complex that can be, and the last is around the importance of user needs and perspectives. Communication especially in the last couple of years has become absolutely necessary for us to do our work. Retailers and publishers really need to work together on metadata display and feature needs, we need to be having conversations with each other about what we want, what our timelines are, what the expectations are around these features, and publishers need to be open to sharing metadata and constraints on their end. You know, we have to work together, we're partners in this, in this project and so, communication is absolutely, absolutely the most important thing to this. I will add because Cristina mentioned I should talk about standards, that standards are really important in this as well. If we're both working from the same model and we're expecting the same information in the same formats, it makes it a lot easier to get this work done and it means you have a shared vocabulary to work from. Implementation. Building accessibility features for retail is incredibly complex. You know, we have multiple roadmaps to be working on, I have multiple teams that are implementing various features. One of the challenges particularly when you're an international retailer is internationalisation, ensuring that features work in different languages and different geographies. So, it may sound simple to implement something like accessibility metadata on the surface, but the reality is it's much more complex and it's why it take a long time for us to do some things. The other major thing to note and especially for people kind of looking on the outside and looking in is that we take an iterative approach to everything that we do. And so it means that we are releasing things incredibly incrementally and we're doing very frequent testing with users with disabilities, and that's required. We need their feedback, we want it early because it's a lot easier to implement their feedback early than it is to go back and do things all over again. Building accessibility features consistently over multiple platforms and code bases, there's not an easy feat and the reality is, especially for most retailers is that we need to be building features on our web platform as well as on apps and potentially physical devices. We want those features to work as similarly as we possibly can considering technical constraints. And we wanna make sure that again, we are touching base with users and getting feedback because even though the features may function similarly platform to platform, the way people interact with them and the way people use them might might differ. You know, someone who uses iOS for everything might have a very different experience than someone who uses Android and we have to take that into account in everything that we do. So it can feel like things take a really long time but the reason for that is because we need to move very carefully and do a lot of listening in between. So be gentle on us. And the last thing I really, really, really wanna emphasise, and this is true in retail, this is true for distribution, this is true for publishers, retail hears it the most because we are the closest to the user in this relationship, but testing and seeking feedback from users with disabilities is absolutely required. This can result in changing direction or approach and it can sometimes maybe feel a little bit frustrating because you have to be prepared to be wrong and you have to test early and test often. Something I'd like to, I'll tell you a little anecdote because this actually recently happened to us. As an organisation we have, at least in the initial phases of our accessibility roadmap and our project, as Christina kind of alluded to, we decided to initially focus on keyboard and screen reader implementation just to get us at the kind of beyond the baseline, but also make sure that those users are really well served. We recently did some testing that involved testing with voice control users, which is a slightly different excessive assistive technology, but we were hoping that we would get some good results. What we ended up finding is that some of the decisions we had made in relation to keyboard and screen reader navigation actually really backfired for voice control, they didn't serve that user the way that we were hoping it would. And so now we get to go back and kind of rethink some of the decisions that we've made and you know, it can be easy to say, "Oh this is really frustrating." Or "Oh we did all this work." But the reality is that it's going to happen. You know, every single person and every single user, regardless of where they're coming from is going to have a different experience of your product but it's really, really important to make sure that you're listening to them and you're taking in all that information and making decisions that help. So, from the retail perspective it's really important to listen to those users and take that feedback in and filter it back up as much as we possibly can into our products and back to our publishers, especially as we all work to implement things like metadata and accessible eBooks. And that's it for me. So I guess I'm gonna pass it back over to Richard.   
- [Richard] Well thank you Wendy. And that's the end of the presentations. And well, we've learned a lot about the adventures on the journey so far. We've covered quite a lot of ground there, but now I'd like to ask our audience for comments or questions for Anne, Cristina, Simon, and Wendy. This could be maybe to help clarify anything or explore a topic in more details. So please keep your questions coming in and we'll cover as many as we can in the remaining time. First question we have, and I think this is probably one for Cristina and Simon, and the question is from Eileen. "Part of the challenge we face when we create eBooks is trying to reimagine complex print designs into eBooks with logical flow. Could you suggest a path towards encouraging people with a print book bias to simplify the print design and layouts?" So maybe Cristina and then Simon could take that.   
- [Cristina] Okay, I just want to be sure that I understood the question. I think that what you mean is that when you have a layout like the PDF ones, when you have a book in a PDF version, you have exactly the same situation of the print version. Why when you need to create a flow one, you need to study a different organisation of the content. In our experience it sure different, but what is really important is not the technical element but the editorial thinking because normally in the design you use some connection or you put something aside to someone else, for example an image or a graphic near a text because there are some logical reason. So in our experience is in editorial work, I don't think you need to simplify completely, so I don't think that accessible book should be a more simplified book, it should be a well organised one. So you need to think very well which are the reason why in the print version you put some content in order or why you put some content in relation with another one. So I don't think simplification is a good work, I think organised content is the best way to think about.   
- [Richard] And how you interpreted the question Cristina, that's how I read it too. Simon, any thoughts from you for people who maybe your colleagues who really wanna hang on to the print layout and yet maybe things are different in the digital world. Any advice for Eileen on how you can suggest that encouraging route for for folk with the print book bias?   
- [Simon] Yeah, absolutely. This rings true for us certainly and really there are some unavoidable situations which are going to cause problems when you come to make an eBook at all, let alone when you try and make it accessible. For us that actually meant having a small team that specialises in this sort of reinterpretation of complex print layouts into ones that work for an eBook. And most of the time the same things that unlock that for a good ebook will already solve a lot of the accessibility problems particularly it comes to structure. But that's also something that our complex eBook team are aware of and build into when we're adapting these books. So accessibility is one of those things. There is also a kind more organic way of trying to influence this. So one of the things I've been doing is going around different teams within the company in art and design parts and also in production and trying to just seed awareness of accessibility all around the company and sort of make people realise the decisions they're making with all the freedom that they have for the print book. Realising the implications of those decisions downstream when the ebook comes to get made and the accessibility problems they may create. So trying to talk to as many people as possible and get that information around has been a recent focus and mission. I've actually had really positive feedback from that, I've had a surprisingly good response and it seems like designers and people involved in layout really do like learning this stuff and they appreciate hearing it. I haven't really had any pushback, whether that will lead to results, we'll find out in the longer term, but I think that kind of fuzzy spreading awareness within a company about the decisions that print designers are making is really, really important.   
- [Wendy] Can I add something to that too?   
- [Richard] Please do.   
- [Wendy] So I'd also add that something to consider as well, not just for accessibility but just kind of end user experience when it comes to these really like highly designed eBooks is that the reality is is that most people who are reading eBooks are reading on their mobile devices so they're reading on their phones. And you know, phones can be pretty big but phone screens can also be quite small. And so if you want someone to enjoy the book and be able to absorb the content and actually enjoy the thing that they have spent money on, designing it with a lot of, you know, with print in in mind is probably going to backfire, the person, the reader is going to be frustrated because maybe they're having to now pan side to side or they're not getting the information they want in a way that's easy for them to read or interact with. So if people are really pushing for that print book bias, it might be good to say like, "Well we know in the digital that most people are going to be reading on their phone, so maybe we need to rethink the design and layout of the digital version of this book." And designing mobile first is always gonna be much more freeing than trying to design for coffee table size and make it work on an iPhone.   
- [Cristina] May I add another two comment?   
- [Richard] Cristina, please go ahead.   
- [Cristina] Yes, that you need to think that, as I said before we start with trade, but right now there are a lot of different kind of books and especially in the school books or in the academic book, it's real important that the people with disability can access to the same content as any other student. So if you create accessible digital version as a reduced version, you don't do this, you reduce the possibility they have, and this is one point. The other thing we spoke a lot at the beginning about visual impaired people, but both the Act and the Marrakesh Treaty include also people with dyslexia or people who have problems in accessing the print book, so what is called print disabled. So you also need to consider these people in the scenario that you are working in when you speak about accessibility.   
- [Richard] Thank you Cristina. And Wendy, thank you for chiming in on that. Keep your microphone open 'cause the next question's coming your way. But first a compliment from someone, which is just a comment to say how heartening it is that Kobo does so much testing with people with lived experiences of print disability. The question though is we heard actually I think from all our speakers on metadata, so I wasn't quite sure where to put this question to, but Wendy for maybe the distributor and retailer, it's best to come to you. We've talked a lot about metadata, but could you just say a few words on what the advantages are of including accessibility metadata? Why is that such a big deal?   
- [Wendy] The big deal really is giving users the information that they need to make the decisions that they need to make about what they're about to purchase. You know, we already use a lot of metadata in book publishing, things like the synopsis, what type of book it is, what genre it is. All of these things help someone make a decision when it comes to whether or not they should purchase it or not. When it comes to accessibility metadata, you're not only providing that information so someone can say, "Hey, oh this is accessible edition, this is what I need." but it's also showing someone that this book is for them. You know, particularly when it comes to people who have print disabilities, you know without accessibility metadata, you don't know that the thing that you might potentially be purchasing can actually work for you, that you can actually read it, which is you know, it's very challenging to find out something you purchased doesn't work, It's like if you you bought a radio and brought it home and you know it didn't turn on, how disappointing would that be? So accessibility metadata really does provide that level of information for print disabled users, but it can also provide information to all users about the thing that they're about to purchase and drive their purchasing decisions. So yeah, it's really, really important. And I mean, part of the implementation as well is allowing people to search for the content that they're looking for with the particular features that they need and you know, just know that determine the difference between maybe the same genre or books from the same publisher. So it's just additional information, it helps drive purchasing decisions or acquisition decisions.   
- [Richard] Thank you Wendy. I think I'll send the next question in the direction of Simon. The question is from Yoke, I hope I pronounce that correctly. So when you were talking about alt text, it sounded as if every image in an ebook should have a description, but this isn't true of webpages or other document formats. So if an image is just decorative and doesn't show any other information that's not in the text, is this also true of the ebook? Is it the same kind of approach to it?   
- [Simon] Absolutely. So yeah, I didn't really want to talk about the implementation down to that level, but absolutely all the same rules apply as for the web. So decorative images would certainly not be read out and actually there's an easy test for that. You can just think if I were listening to this book and you can do that with lots of free tools, you know, what would I want? Would I want to hear all of these decorative elements being described to me? And the answer is generally no. So all of the same kind of user experience questions you might be asking with any other type of design work are are relevant, they're just relevant, you know, think about listening, there's nothing different about going for accessibility or working with screen readers, you're looking for a good user experience and there's nothing better for that than actually testing. So even to the point of buying some of the bits of software where you need to and testing it out. So most definitely do not describe absolutely everything, there are millions of good guidelines sets out there, I won't name anyone in particular, but there are lots and lots of good bits of advice out there on exactly what to describe and how to describe it.   
- [Richard] Thank you Simon. Turning to Cristina, a second question from Yoke is related. So you mentioned web accessibility, the question is, how does ebook accessibility relate to WCAG, the Web Content Accessibility Guidelines? Does this relate to EPUB? Cristina, can you help with that? - Yes, as you know, the EPUB is based on html, that is a standard managed by W3C. There are some specific accessibility guidelines that has been created, especially for the EPUB, but the basic principle are more or less the same. But I suggest that you go to the accessibility guideline for EPUB that are more detailed than the one for the web, books are more complicated than webpages generally. So, and I think that Richard and DAISY can link you to the correct place where you can find all that. And just another comment, we have done, we as Fondazione LIA in collaboration with other people, have done a mapping on the requirement of the European Accessibility Act in relationship with the standard that are already available in market. And we are very happy to say that EPUB a is absolutely compliant with what is included in the legislation. So the commission didn't decide to ask for a new standard, but they considered the one that are on the market, the good ones to follow. So you can start now to work on EPUB and don't have to wait until the registration is in place. So this is important because to be ready for the 2025 as soon as you start, the better it is.   
- [Richard] Thank you Cristina. Next question is coming to you Anne. Cristina mentioned in her presentation there about the work with Adobe because this is what many publishers are using in her experience, and certainly we hear this a lot within the European Accessible Publishing Forum that DAISY coordinates. This must come up a lot I guess within the Federation of European Publishers. I wondered if you had any thoughts on what the possible ways are forward for making progress with the tools that are used so often by publishers in particular those from Adobe?   
- [Anne] Well, it's a good question. We have reached to Adobe and I mean, I dunno whether there's anyone from Adobe in this call, but honestly we've reached several years ago just after the adoption of the directive because we heard from publishers, and I'm the least technical person in this panel, so I'm just relating I've been told by publishers, is that in design, is actually not very helpful when it comes to accessibility and that you have to rework a number of things you've done. So maybe this is the call for you and for DAISY that maybe we should do it together, maybe we should involve other organisation and talk to Adobe and and tell them, you know, this is a journey we are in it together, this is not a journey just for the authors or the publishers or the books seller, it's a journey for everyone and the beneficiaries are gonna be the readers, whether people with disability or not disability, everyone will be winning. But, so if DAISY is willing to team with the Federation of European Publishers to put some pressure on Adobe and be delighted.   
- [Richard] Well Cristina talked about collaboration. Let's see if together working with the Federation of European Publishers and with Adobe we can fix that broken phone line that Cristina talked about. Okay, so the next question is again on metadata, and I'm not sure who's best to take this one. The questions from Beverly. Beverly says that Simon talked about metadata in both the EPUB and in ONIX and Beverly has read that in the European Accessibility Act metadata is required in the EPUB, but ONIX is perhaps not mentioned. What's the best practise here? So maybe this can go to Simon and to Wendy if you want to add additional comments.   
- [Cristina] May I just add a comment on the legislation and then I leave the floor to the technical part? Because in legislation, there is no specific requirement for one standard of metadata. And this is another good point because also ONIX and Schema were accepted as a standard of the market. So I think it's important that metadata answer the question to provide reliable and consistent information to the end user. So I think it's better that there is no specific detail requirement because if the metadata change and the spec evolve, it's better to have the possibility to update them without going back to the legislation, this is the concept of the legislation.   
- [Simon] I'm certainly--   
- [Richard] Thank you Cristina. So yeah, Simon please talk about best practise.   
- [Simon] Yeah, so that mean certainly that's how we've taken it, so we've not tried to work out which of the two we should be doing. We implemented the schema.org ones earlier as a kind of experiment and because it was easier for us to roll out for technical reasons. But really you are representing, you know, there are differences in what is being expressed between the Schema Metadata and the ONIX Codlist 196, they're not quite the same, but if you are in a position that you are answering the questions for one, you can answer questions for the other, they're very similar. So really any sort of at scale technical solution ought to be addressing both, that shouldn't be a huge amount of extra work over just doing one as it were. And we just wouldn't want to be in the position where we've developed for one and not the other. So we have not really looked to the legislation to answer that for us, we can say these are the two dominant standards, this is what seems to be the done thing. We already work, we already do do work in our own OPF files obviously, and then we already have extensive teams around ONIX and what we put in that. So it was just a logical move to go with both, so certainly best practises is to be doing both. There won't be identical information in in the two, but they'll be very similar.   
- [Richard] Thank you Simon. And Wendy as a distributor, are both of these standards and implementations important to you?   
- [Wendy] Yes, absolutely. So from our perspective, both like so distribution and retail, we use the ONIX, and that is what we use to display. So if you got what you see on the website or what you see in the applications, that is derived from the ONIX Metadata. The reason we've made that choice, and this is true for many retailers, not just Kobo, is because it's easier to update, it's more up to date because it doesn't require someone sending a whole new version of their EPUB file in order to update, Especially if something, it's like a one line change, you can just send a new ONIX feed, you don't have to redo your entire EPUB. However, I will say for the EPUB itself, it's really important to have the metadata in there and for the two to match because someone could be downloading their EPUB files and putting them on a different device or into a different ecosystem, this is particularly true when we're talking about users with print disabilities and the internal EPUB metadata would be used in those side loading contexts to pull out that same information. So it is really important as a publisher to make sure that you're providing whatever formats your retail partners or your distribution partners are using, making sure that you're both using the internal EPUB metadata and external, be that ONIX something like Mac and their accessibility standards as well. Having them be as close as possible, you know obviously the crosswalk isn't like one to one in all cases, but it is very easy to have them match as closely as possible. And there is documentation out there on the crosswalk between things like ONIX and Schema and all of that.   
- [Richard] That's great, thank you. If in the audience you've asked a question and we haven't got to it, then we'll write to you directly. But right now we're coming to the end of this session. And once again, a huge thank you to Anne, Cristina, Simon, and Wendy for giving us the benefit of your lessons learned on the road to accessible publishing. And once again, we'll be posting the slide deck, video transcript and links to resources at daisy.org/webinars in the next few days. These accessible publishing and reading webinars are brought to you by the DAISY Consortium, the global nonprofit organisation delivering innovative and impactful initiatives to further the mission of accessible publishing and reading. If you have ideas for other webinar topics in the area of accessible reading and publishing, including any that you might contribute to, we'd love to hear from you. Well, that's it for this session. I'll hope you'll join us for more DAISY webinars in 2023. But in the meantime, thank you for your time. Stay safe and well and have a wonderful rest of your day. Goodbye.