



Toolkit for the Transposition of the Audiovisual Media Services Directive into National EU Member States Law

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Executive Summary

Accessing the Information Society and information and communication technologies (ICTs), which includes access to the content, is a fundamental right for people with disabilities. At the European level, the Audiovisual Media Services Directive, adopted by the European Parliament and the Council on 11 December 2007, constitutes the European framework for broadcasting activities, whatever the technological support is. During its review between 2005 and 2007, clear references regarding access to the content of audiovisual media services and the use of the images of disabled people in audiovisual commercial communications were added.

Due to technological evolution and the switchover to digital technologies, the scope of the Directive evolved from television to audiovisual media services. It means that television is not the only technology covered by the directive any more but all audiovisual media services. Analogical and digital television, Internet, mobile phone services, on-demand television, mobile television services should progressively be made accessible (article 3 (c)). However, it is important to note that access to the content of audiovisual media services is covered but not the hardware such as television sets for example.

The use of images of people with disabilities in audiovisual commercial communications only, and not all audiovisual media services programmes, was also reinforced with the adoption of the Audiovisual Media Services Directive. It prohibits the provision of audiovisual commercial communications by a service media provider if they prejudice respect for human dignity and include or promote any discrimination based on disability (Article 3(e)).

The European Disability Forum (EDF) and its members lobbied hard to improve the Directive and succeeded. To continue this action, this toolkit aims at supporting EDF members to discuss and negotiate its transposition in the European Union (EU) member states law.

Introduction

Access to the Information Society is a fundamental right for people with disabilities, who use ICTs to a higher extent than people in general, to live independently and fully participate in society and access education, work and leisure. The United Nations Convention on the Rights of People with Disabilities reaffirms this right (article 9¹), which includes right to “enjoy access to television programmes in accessible format” (article 30²). Television is indeed vital in defining the cultural landscape of modern societies and provides a primary source of information, education and entertainment, from which disabled watchers shall not be excluded.

Even if each Member States of the EU pursue its own audiovisual policy, the EU defines some benchmarks involving common interests. The Audiovisual Media Services Directive, which is the new name of the television without Frontiers Directive after the 2007 review, sets this EU level framework and some provisions directly concern people with disabilities, for which EDF and its members fought hard during the revision process.

This legislation is a directive and, before entering into force, it must be transposed. In other words, its provisions need to be incorporated into national law to become binding. This process should be finished by 19 December 2009³. This toolkit on the transposition of the Audiovisual Media Services Directive precisely aims at supporting EDF members’ work while following and discussing with national government the transposition process.

¹ “Article 9 Accessibility. 1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia: (a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces; (b) Information, communications and other services, including electronic services and emergency services. 2. States Parties shall also take appropriate measures: (a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public; (b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities; (c) To provide training for stakeholders on accessibility issues facing persons with disabilities; (d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms; (e) To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public; (f) To promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information; (g) To promote access for persons with disabilities to new information and communications technologies and systems, including the Internet; (h) To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.”

² “Article 30 Participation in cultural life, recreation, leisure and sport 1. States Parties recognize the right of persons with disabilities to take part on an equal basis with others in cultural life, and shall take all appropriate measures to ensure that persons with disabilities: (a) Enjoy access to cultural materials in accessible formats; (b) Enjoy access to television programmes, films, theatre and other cultural activities, in accessible formats; (c) Enjoy access to places for cultural performances or services, such as theatres, museums, cinemas, libraries and tourism services, and, as far as possible, enjoy access to monuments and sites of national cultural importance.”

³ Article 2 of the Regulation (EC) No 2006/2004 of the European Parliament and of the Council of 27 October 2004 on cooperation between national authorities responsible for the enforcement of consumer protection laws as amended by the Directive 2007/65/EC of the European Parliament and of the Council of 11 December 2007.

After explaining the scope of the Audiovisual Media Services Directive, which changed due to technological developments, two main elements are crucial for people with disabilities: access to the content of audiovisual media services and the use of the image of disabled people in audiovisual commercial communications.

The scope of the Directive: from Television to Audiovisual Media Services

The chapter 1 of the Directive provides definitions of the key concepts used throughout the Directive.

The previous Directive was covering television broadcasting only. But, due to technological changes and, especially, the shift to digital technologies, content can be seen from different supports. As a result the definition of television broadcasting has been enlarged to audiovisual media services.

The Directive defines **audiovisual media services** as, on one side audiovisual commercial communication, and on the other side as “a service as defined by articles 49 and 50 of the Treaty which is under the editorial responsibility of a media service provider and the principal purpose of which is the provision of programmes in order to inform, entertain or educate, to the general public by the meaning of Article 2(a) of Directive 2002/21/EC. Such an audiovisual media services is either a television broadcast as defined in point (e) of this article or an on-demand audiovisual media services as defined in point (g) of this Article.”

By **services**, the Treaty establishing the European Communities (EC Treaty) means services provided for remuneration and includes activities of an industrial or commercial character as well as activities of craftsmen and of the professions (Article 49 and 50 of the EC Treaty).

The **editorial responsibility** concerns an effective choice of the programme as well as of the organisation of the schedule *for linear services* or catalogue for *non-linear services* (please see below for the definitions). Being legally liable under national law is not compulsory (Article 1 (c)).

Electronic communications networks are “transmission systems and, where applicable, switching or routing equipment and other resources which permit the conveyance of signals by wire, by radio, by optical or by other electromagnetic means, including satellite networks, fixed (circuit- and packet-switched, including Internet) and mobile terrestrial networks, electricity cable systems, to the extent that they are used for the purpose of signals, networks used for radio and television broadcasting, and cable television networks, irrespective of the type of information conveyed” (article 2 (a) of the

Directive 2002/21/EC of the European Parliament and of the Council of 7 March 2002 on a common regulatory framework for electronic communications networks and services (Framework Directive)). This Directive is currently being reviewed and some changes may happen in a near future.

Television broadcast or television broadcasting is “an audiovisual media service provided by a media service provider for simultaneous viewing of programmes on the basis of a programme schedule” (Article 1 (e)). These *linear* audiovisual media service correspond to services that “push” content to viewers.

On-demand audiovisual media service means an audiovisual media service provided by a media service provider for the viewing of programmes at the moment chosen by the user and at his individual request on the basis of a catalogue or programmes selected by the media providers” (Article 1 (g)). These *non linear* audiovisual media services concern services where viewers “pull” content from a network.

Adding this distinction between linear and non-linear services broadens the scope of the Directive and as a result the audiovisual media services covered are not any more dependent from the method of broadcasting.

In the context of the Directive **programme** means “a set of moving images with or without sound constituting an individual item within a schedule or a catalogue established by a media service provider. Their form and content are comparable to the form and content of television broadcasting. Examples of programmes include feature-length films, sports events, situation comedies, documentaries, children’s programmes and original drama” (Article 1 (b)).

According to the Directive, **media service provider** means “the natural or legal person who has editorial responsibility for the choice of the audiovisual content of the audiovisual media service and determines the manner in which it is organised” (Article 1, (d)). For example, BBC or online newspaper are media service providers for their audiovisual media services activities.

The Directive defines **audiovisual commercial communication** as images which “are designed to promote, directly or indirectly, the goods, services or image of a natural or legal entity pursuing an economic activity”. They could be with or without sound and could accompany or be included in a programme. Usually they are paid but other forms could be similar consideration in return or self-promotion. “Forms of audiovisual commercial communication include, inter alia, television advertising, sponsorship, teleshopping and product placement” (Article 1(h)).

It is important to note that the Directive concerns the content of audiovisual media services and not hardware such as television sets. Analogical and digital television are directly concerned by these measures, although the switchover to digital television is foreseen in 2012 by the EU. Nonetheless focusing on digital technologies already make

sense in order to avoid further exclusion, bearing also in mind that the Directive will be in force for at least the next decade.

To give some example, audiovisual media services definition covers traditional and digital television services, internet and mobile phone services, on-demand television but also mobile television services or menu navigation.

Accessibility of Audiovisual Media Services

Accessibility of the content of the audiovisual media services was not present in the TV without Frontiers Directive. EDF and its members successfully lobbied to introduce some reference to e-accessibility, which EDF understands as access to mainstream ICT products and services by the widest possible number of people, regardless of their age or disabilities, in accordance with the concept of Design for All.⁴

The right to be part of social and cultural life, for which access to audiovisual media services is a prerequisite, is recognised in the recital 64: “the right of persons with a disability and of the elderly to participate and be integrated in the social and cultural life of the Community is inextricably linked to the provision of accessible audiovisual media services.”

The article 3 (c), even if not totally satisfactory for EDF and its members, provides some improvements and possibly paves the way for further e-accessibility provisions. It states that “Member States shall encourage media services providers under their jurisdiction to ensure that their services are gradually made accessible to people with a visual or hearing disability.” Thus, Member States have the obligation (“shall”) to encourage media services providers to progressively make their services accessible, by for instance promoting e-accessibility measures and/or supporting initiatives from media services providers depending on their national. Unfortunately, only deaf, hard of hearing, blind, partially sighted and deaf blind users are concerned by any of these measures.

The Directive also provides with some example to develop accessibility: “the means to achieve accessibility should include, but need not be limited to, sign language, subtitling, audio description and easily understandable menu navigation” (Recital 64).

Accessibility measures in favour of people with intellectual disabilities such as easy-to-understand programmes, concise and jargon-free on-screen menus, simple layout and unambiguous navigation features are not covered by the Directive. Even if improvements on e-accessibility should be noticeable in the coming years, there is no deadline for achieving fully inclusive audiovisual media services. However, provisions in

⁴ For more information on e-accessibility, please refer to the joint ANEC-EDF position paper on web and e-accessibility legislation, July 2008.

the Directive are the basic level of implementation and Member States can enhance and deepen any of them.

Finally, it is also crucial to bear in mind that television accessibility measures do not only benefit persons with disabilities.

As a consequence of an increasing ageing of the European population, the number of those living with hearing or/and sight impairments will rise significantly in the coming years. "Life expectancy in European societies has dramatically improved: from 43,5 years to 1900 in 74,6 in 2004 and a projected 84,5 in 2060 for men, and from 46,0 to 80,9 with a projected 89 for women."⁵ Accessibility of television is of particular importance to this group of people, since studies demonstrate that they rely most on audiovisual services⁶.

Some features favouring accessibility are also useful to other categories of the population. By increasing the amount of subtitling on television, broadcasters are providing an improved service for the vast majority of their viewers. People learning a second language, children learning to read and spell⁷ and those watching television in noisy environments can also benefit from subtitling. Audio description can be of great benefit when the viewer wants to do something else, e.g. housework, while following a television programme. Impact assessments of accessibility measures show that in countries where such services are provided, they are very widely used by disabled and non-disabled people alike. Research shows that they would be even more widely used if they were promoted more and made easier to access⁸. In other countries, provision of accessibility measures to disabled persons is at a very low level, ranging from non-existent in some Member States to selective accessibility of private channels and the most popular programmes on public channels.

The Image of Disabled People in Audiovisual Commercial Communications

The Directive prohibits the provision of audiovisual commercial communications by a media service provider if they prejudice respect for human dignity and include or promote any discrimination based on sex, racial or ethnic origin, nationality, religion or belief, disability, age or sexual orientation (Article 3 (e)).

EDF defines "prejudice" as a process of "pre-judging" something or someone. Disabled people are very often victims of social stereotypes due to lack of knowledge and fear towards disability. Discrimination occurs when people disregard that disabled people

⁵ European Commission (2008) *Commission Staff Working paper Towards a renewed Social Agenda for Europe – Citizens' Well being in the Information society*, Sec(2008)2183.

⁶ See for example: Hanley, P. (2002) *The numbers Game –older people and the media* in: Independent Television Commission.

⁷ See for example: Linerberger, D. (2001) Learning to Read from the Television: The Effects of Using Captions and Narration in: *Journal of educational Psychology* 2001, vol.93, n^o2.

⁸ See for example: McKivragan, G. (1995) *Audetel: Potential Among the General Population* in: BBC Broadcasting Research.

are foremost women and men, as anybody else, making unfair and premature conclusions based on disabled people's impairments or difference.⁹

Social participation of disabled people is undermined by the image they are given in the media. They are under-represented and given a negative image in audio-visual media. Films and books often portray them as people to be pitied or feared. The media also support a stereotyped, sensationalist and negative image of people with mental health problems, making it even harder for them to gain social acceptance. A study carried out in 1988 showed that disabled people very rarely appeared in the news, unless the subject was a medical cure or treatment, or the achievements of an individual who had overcome his or her disability. Programmes involving the participation of the public were also discriminatory: there was not one disabled person among the participants or audiences in televised game shows. In the same way, characters in fiction were very rarely disabled.

Therefore, in the scope of the Directive, discrimination should be understood as the exposure of a negative image of persons with disabilities or envisaging a disability in a humiliating and hurting the dignity of persons with disabilities way.

Implementation, Monitoring and Reviewing of the Audiovisual Media Services Directive

During the transposition and implementation processes, it is essential to reaffirm the need for the participation of people with disabilities and their representative organisations. They have the expertise from the users' side and provide with their expertise.

Although transposition and implementation are crucial at a first stage, monitoring and reporting on the effects and results seen on the fields is essential too. By 19 December 2011 at the latest, the European Commission shall submit a report to the other EU institutions on the application of the Directive (article 26). Gathering information and exchanging best practices would lead to improve accessibility of audiovisual media services between EU Member States. It could also support request for a further review of the legislation.

⁹ For more information, please refer to the Media and Disability Declaration, June 2003.

Summary of recommendations

Below is listed some recommendations of actions that EDF members may follow while discussing and negotiating the transposition of the Audiovisual Media Services Directive:

Identifying and contacting the national decision-makers in charge of the transposition:

- Identify the national process of transposition of the Audiovisual Media Services Directive (i.e. law, regulation and administrative provisions) and contact the decision-makers in charge at the government, parliament or administration.
- Depending on each national decision-making process, the regulatory body may be associated to the taking of decisions for the transposition (article 23(c)). It may also be responsible for monitoring and evaluating the transposition of the Directive later on. In some countries, the regulatory body may be the same as for telecommunications but in other there can be two different structures.

The content of the national law should at least contain the requirements of the Audiovisual Media services Directive, but this is a minimum and not a maximum. It means that you can ask your national decision-makers to complete the dispositions by:

- Referring to all people with disabilities instead of people with visual or hearing disability only.
- Proposing a minimum level of subtitling, interpretation in sign language and audio description in public and/or private programmes by a certain date.
- Detailing the programmes which should be accessible such as programme of general public interest, news programme, etc.
- Making reference to any related-standards if any existing at national level

Raising awareness on the Audiovisual Media Services Directive and the rights for people with disabilities:

- Disseminate information to your members about the adoption and transposition of the Audiovisual Media Services Directive by for instance writing information leaflets
- Contact the organisations involved in the transposition process such as the audiovisual media services providers or the broadcasting unions to discuss the transposition and implementation of the Audiovisual Media Services Directive
- Request the minister in charge of the transposition of the Audiovisual Media Services to spread information on disability-related subjects.
- Contact and work with the organisation in charge of ethics on TV.

Monitoring and reviewing

- Monitor the Directive implementation at national level

- Monitor the content of the audiovisual commercial communications and take actions in case of breach of Art. 3 (e) (the image of disabled people in these communications)
- Ensure the presence and consultation of people with disabilities and organisations representing them while reviewing the Directive

ANNEX I: Consolidated Version of the Audiovisual Media Services Directive

Only the articles mentioned in the toolkit are reproduced below but the full consolidated version of the Audiovisual Media Services Directive is available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1989L0552:20071219:EN:PDF>

Please note that the consolidated version on the Directive is meant purely as a documentation tool and the only liable texts are the ones published in the Official Journal. References for the initial directive and the two reviewing Directives are below:

- Directive 89/552/EC of the European Parliament and of the Council of 3 October 1989 (OJ L 298, 17-10-1989, p. 23). The Directive is available online at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31989L0552:EN:HTML>,
- Directive 97/36/EC of the European Parliament and of the Council of 30 June 1997 (OJ L 202, 30-07-1997, p. 60). The Directive is available online at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31997L0036:EN:HTML>,
- Directive 2007/65/EC European Parliament and of the Council of 11 December 2007 (OJ L 332, 18-12-2007, p. 27). The Directive is available online at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:332:0027:01:EN:HTML>,

Directive 2007/65/EC of the European Parliament and of the Council of 11 December 2007 amending Council Directive 89/552/EEC on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the pursuit of television broadcasting activities

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Recitals

(64) The right of persons with a disability and of the elderly to participate and be integrated in the social and cultural life of the Community is inextricably linked to the provision of accessible audiovisual media services. The means to achieve accessibility should include, but need not be limited to, sign language, subtitling, audio-description and easily understandable menu navigation.

HAVE ADOPTED THIS DIRECTIVE:

CHAPTER I - Definitions

Article 1

For the purpose of this Directive:

(a) 'audiovisual media service' means:

- a service as defined by Articles 49 and 50 of the Treaty which is under the editorial responsibility of a media service provider and the principal purpose of which is the provision of programmes in order to inform, entertain or educate, to the general public by electronic communications networks within the meaning of Article 2(a) of Directive 2002/21/EC. Such an audiovisual media service is either a television broadcast as defined in point (e) of this Article or an on-demand audiovisual media service as defined in point (g) of this Article, and/or
- - audiovisual commercial communication;

(b) 'programme' means a set of moving images with or without sound constituting an individual item within a schedule or a catalogue established by a media service provider and whose form and content is comparable to the form and content of television broadcasting. Examples of programmes include feature-length films, sports events, situation comedies, documentaries, children's programmes and original drama;

(c) 'editorial responsibility' means the exercise of effective control both over the selection of the programmes and over their organisation either in a chronological schedule, in the case of television broadcasts, or in a catalogue, in the case of on-demand audiovisual media services. Editorial responsibility does not necessarily imply any legal liability under national law for the content or the services provided;

(d) 'media service provider' means the natural or legal person who has editorial responsibility for the choice of the audiovisual content of the audiovisual media service and determines the manner in which it is organised;

(e) 'television broadcasting' or 'television broadcast' (i.e. a linear audiovisual media service) means an audiovisual media service provided by a media service provider for simultaneous viewing of programmes on the basis of a programme schedule;

(f) 'broadcaster' means a media service provider of television broadcasts;

(g) 'on-demand audiovisual media service' (i.e. a non-linear audiovisual media service) means an audiovisual media service provided by a media service provider for the viewing of programmes at the moment chosen by the user and at his individual request on the basis of a catalogue of programmes selected by the media service provider;

(h) 'audiovisual commercial communication' means images with or without sound which are designed to promote, directly or indirectly, the goods, services or image of a natural or legal entity pursuing an economic activity. Such images accompany or are included in a programme in return for payment or for similar consideration or for self-promotional purposes. Forms of audiovisual commercial communication include, inter alia, television advertising, sponsorship, teleshopping and product placement;

(i) 'television advertising' means any form of announcement broadcast whether in return for payment or for similar consideration or broadcast for self-promotional purposes by a public or private undertaking or natural person in connection with a trade, business, craft or profession in order to promote the supply of goods or services, including immovable property, rights and obligations, in return for payment;

(j) 'surreptitious audiovisual commercial communication' means the representation in words or pictures of goods, services, the name, the trade mark or the activities of a producer of goods or a provider of services in programmes when such representation is intended by the media service provider to serve as advertising and might mislead the public as to its nature. Such representation shall, in particular, be considered as intentional if it is done in return for payment or for similar consideration;

(k) 'sponsorship' means any contribution made by a public or private undertaking or natural person not engaged in providing audiovisual media services or in the production of audiovisual works, to the financing of audiovisual media services or programmes with a view to promoting its name, its trade mark, its image, its activities or its products;

(l) 'teleshopping' means direct offers broadcast to the public with a view to the supply of goods or services, including immovable property, rights and obligations, in return for payment;

(m) 'product placement' means any form of audiovisual commercial communication consisting of the inclusion of or reference to a product, a service or the trade mark thereof so that it is featured within a programme, in return for payment or for similar consideration;

(n)

i. 'European works' means the following:

- works originating in Member States,
- works originating in European third States party to the European Convention on Transfrontier Television of the Council of Europe and fulfilling the conditions of point (ii),
- works co-produced within the framework of agreements related to the audiovisual sector concluded between the Community and third countries and fulfilling the conditions defined in each of those agreements, application of the provisions of the second and third indents shall be

conditional on works originating in Member States not being the subject of discriminatory measures in the third country concerned;

- ii. The works referred to in the first and second indents of point (i) are works mainly made with authors and workers residing in one or more of the States referred to in the first and second indents of point (i) provided that they comply with one of the following three conditions:
 - they are made by one or more producers established in one or more of those States, or
 - production of the works is supervised and actually controlled by one or more producers established in one or more of those States, or
 - the contribution of co-producers of those States to the total co-production costs is preponderant and the co-production is not controlled by one or more producers established outside those States;
- iii. Works that are not European works within the meaning of point (i) but that are produced within the framework of bilateral co-production treaties concluded between Member States and third countries shall be deemed to be European works provided that the co-producers from the Community supply a majority share of the total cost of production and that the production is not controlled by one or more producers established outside the territory of the Member States.

CHAPTER IIa - Provisions applicable to all audiovisual media services

Article 3c

Member States shall encourage media service providers under their jurisdiction to ensure that their services are gradually made accessible to people with a visual or hearing disability.

Article 3e

1. Member States shall ensure that audiovisual commercial communications provided by media service providers under their jurisdiction comply with the following requirements:

- (a) audiovisual commercial communications shall be readily recognisable as such. Surreptitious audiovisual commercial communication shall be prohibited;
- (b) audiovisual commercial communications shall not use subliminal techniques;
- (c) audiovisual commercial communications shall not:
 - (i) prejudice respect for human dignity;

- (ii) include or promote any discrimination based on sex, racial or ethnic origin, nationality, religion or belief, disability, age or sexual orientation;
- (iii) encourage behaviour prejudicial to health or safety;
- (iv) encourage behaviour grossly prejudicial to the protection of the environment;

CHAPTER VIb - Cooperation between member states' regulatory bodies

Article 23b

Member States shall take appropriate measures to provide each other and the Commission with the information necessary for the application of the provisions of this Directive, in particular Articles 2, 2a and 3 hereof, notably through their competent independent regulatory bodies.

CHAPTER VII - Final provisions

Article 26

Not later than 19 December 2011, and every three years thereafter, the Commission shall submit to the European Parliament, the Council and the European Economic and Social Committee a report on the application of this Directive and, if necessary, make further proposals to adapt it to developments in the field of audiovisual media services, in particular in the light of recent technological developments, the competitiveness of the sector and levels of media literacy in all Member States.

This report shall also assess the issue of television advertising accompanying or included in children's programmes, and in particular whether the quantitative and qualitative rules contained in this Directive have afforded the level of protection required.

ANNEX II: About EDF

1. About EDF

The European Disability Forum (EDF) is the European umbrella organisation representing the interests of 50 million disabled citizens in Europe. EDF membership includes national umbrella organisations of disabled people from all EU/EEA countries, accession countries and other European countries, as well as European NGOs representing the different types of disabilities. The mission of the European Disability Forum is to ensure disabled people full access to fundamental and human rights through their active involvement in policy development and implementation in Europe.

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