



The voice of blind and partially sighted people in Europe

## **Accessible Lifts - Statement on ballot within CEN/TC 10 regarding contrast requirements in EN 81-70**

4 October 2016

In relation to the ballot within CEN/TC 10 and the attached letter from the convenor of WG 7 from 9 September 2016 regarding contrast requirements in EN 81-70, that has been distributed to the national standardisation bodies, the European Blind Union (EBU) needs to make a statement expressing serious concern. The intention to reduce the required contrast of symbols on buttons from an LRV difference of 60 to 30 points is unacceptable due to the following three reasons:

- 1. The draft**, which complies with the current state of the art, would be **changed substantially** without any established justification.

Reading the received comments it shows, that the reduction has not been demanded by seven countries. In fact, they were mostly just asking for clarification on specific details regarding contrast requirements. All other countries did not even broach the issue of contrast and therefore agreed with the minimum values as required in the draft.

- 2. The intended reduction of contrast requirements does not comply with the current state of the art** for Universal Design as defined in numerous national, European and international rules and standards.

Miscellaneous standards containing specifications for contrast values use different measurement (LRV difference, Michelson, Weber etc.). However, all standards we have searched so far have one thing in common: Most of them distinguish between two grades of minimum contrast values for items with different importance in relation to e.g. usability or safety. All of them assign text information such as a number on a button in a lift car to the category with higher contrast requirements than e.g. for a button to its surroundings. Irrespective of the used measurement, the value for this category clearly exceeds an LRV difference of 30 points:

- ISO 21542(2011) "Building Construction - Accessibility and usability of the built environment": LRV difference  $\geq 60$  points



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- EN 16584-1(2016) "Railway Applications - Design for PRM Use - General Requirements - Part 1: Contrast": LRV difference  $\geq 60$  points
- ÖNORM B 1600 (2013) "Accessible built environment - Design principles": LRV difference  $\geq 50$
- DIN 32975(2009) "Designing visual information in the public area for accessible use": Michelson contrast  $\geq 0,7$
- SIA 500 (2009) "Obstacle free buildings": Michelson contrast  $\geq 0,6$
- BS 8300(2009) "Design of buildings and their approaches to meet the needs of disabled people - Code of practice": LRV difference  $\geq 70$  points

**3. In a standard responsible for the implementation of Universal Design, adopting a minimum requirement that is insufficient to ensure accessibility clearly **conflicts the political requirements of the UN Convention on the Rights of Persons with Disabilities.****

The reduction of the mandatory minimum contrast requirement would declare a major obstacle for persons with reduced vision as an accessible/usable solution and therefore legitimatise it. This would also concern innumerable elderly people being particularly dependent on using lifts due to age-related mobility impairment.

Planners and operators of buildings and parts of buildings accessible to the public are legally obligated to meet the provisions of the UN Convention on the Rights of Persons with Disabilities and related regulations on a national level by implementing the principles of Universal Design. Standards such as EN 81-70 serve the purpose to support them by providing technical specifications.

De facto, defining an appropriate minimum contrast value for symbols on buttons within EN 81-70 can and will not keep anyone, who considers a specific appearance more important than usability for all, from producing or applying control elements that do not comply with this value or to even base their procurement on this standard. Sadly enough, there are still countless passenger lifts in areas accessible to the public, where the current EN 81-70's requirements for control elements have not been considered at all and only EN 81-20 has been achieved. However, this must not cause an adaptation of



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EN 81-70 in a way that makes insufficient contrast values literally become standard and continue to be implemented. Thereby, the standard would completely fail at its duty to facilitate the implementation of Universal Design, which includes persons with disabilities as users.

As advocacy group of those persons that would particularly be affected by the intended amendment in the draft of EN 81-70, the EBU strongly recommends **not to reduce the obligatory requirement** of an LRV difference of 60 points for symbols on control elements in order to ensure sufficient visibility of the information and usability of the lifts for all passengers.

Kind regards,

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on behalf of the European Blind Union (EBU)

EBU is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union. It protects and promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of national organisations of the visually impaired in 44 European countries.