



Raising standards for consumers

POSITION PAPER

Accessibility of Lifts: How the European standard prEN 81-70:2020 can meet the legal requirements?

Open technical issues



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1 | INTRODUCTION

Accessibility of the built environment, products and services, is essential for people with disabilities and for an ageing society to be able to exercise their rights and fully participate in society.

- Following the **European Disability Strategy 2010-2020** - a common commitment at European and national level to improve the conditions of accessibility for people with disabilities - and in accordance with the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), the European Union recognized standardization as a powerful tool for achieving the goal of greater accessibility, and issued CEN/CENLEC GUIDE 6 and a series of mandates to reach this aim.

Main references are:

- **CEN/CENELEC Guide 6** "Guide for addressing accessibility in standards". It addresses accessibility requirements and recommendations in standards that focus, whether directly or indirectly, on systems (i.e., products, services and built environments) used by people;
- **EU Mandate 473** (2010) to include Design for all in relevant standardisation initiatives to include accessibility requirements following the DfA approach in European "mainstream" standards. These are **EN 17161:2019** "Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users" and the 'Protocol' providing detailed advice on how to include accessibility in standards with a method to follow.
- **EU Mandate 420** (2008) to develop European requirements for the public purchase of products in the Built Environment, which outcome has been: **EN 17210:2021** "Accessibility and usability of the built environment – Functional requirements". It is the main leading horizontal accessibility standard for the built environment (which mainly refers to **ISO 21542**); The two Technical Reports are showing ways how functional requirements in EN 17210:2021 can be fulfilled: **CEN/TR 17621:2021** "Accessibility and usability of the built environment – Technical performance criteria and specifications" and **CEN/TR 17622:2021** "Accessibility and usability of the built environment – Conformity assessment".
- European commission refers on website of DG "Employment, social affairs and inclusion" to Accessibility standardization and on Actions to "accessibility of the built environment" to the leading standard EN 17210:2021 "Accessibility and usability of the built environment" and refers also to the other three horizontal EN standards in the field of 'Design for all' approach, on ICT products and service, and on websites and mobile applications: <https://ec.europa.eu/social/main.jsp?catId=1485&langId=en>

- **EU Mandate 549 for CEN/TC 10** regarding lifts and safety components for lifts. Lift standards for persons shall take into account usability and accessibility in line with the United Nations Convention on the Rights of Persons with Disabilities and to draft harmonised standards in support of the implementation of essential health and safety requirements laid down in Annex I to Directive 2014/33/EU of the European Parliament and of the Council on lifts and safety components for lifts; in particular by revising existing harmonised standards in order to make them fully compatible with that Directive.
- At ISO level, the same approach has been developed. **ISO 21542:2011** "Accessibility and usability of the built environment" has been revised and will be published soon.

See more details on legal requirements and on European and international standardization on accessibility in clause 2 and 3.

Considerations:

Referring to the above normative framework, we can summarise that: "Requiring an accessible built environment not only ensures suitable access and comfort based on 'Design for all / Universal Design' for a wider range of users including persons with disabilities but also contributes to their safety by creating a built environment", products and services, "where particular consideration is taken to avoid and/or reduce risks. Designing for safety includes minimizing the risk of making mistakes and reducing the need for excess exertion which may lead to strain or injury" (Ref. EN 17210:2021, 4.5 plus EN 17161:2019).

After the coordination and agreement between CEN/BT and CEN/TC 10, following ANEC appeal to respect legal requirements on visual contrast in push buttons and their surroundings in a lift (BT decision C062/2010), and related amendment developed within CEN TC 10 WG 7, for the ongoing Technical revision of prEN 81-70:2020,

ANEC asks CEN/TC 10 WG 7

- to respect the UN CRPD which is legally binding for EU and their Member States;
- to follow Design for All / Universal Design principles as addressed by European Commission and also in relevant accessibility standardization;
- to include some technical improvements based on the relevant functional requirements in EN 17210:2021 as detailed here below.

It is important to underline that according to the UN Convention we need to have one standard for accessible lifts for buildings usable for all persons, including persons with disabilities. It makes no sense to have an application standard on accessible lifts (EN 81-70) on the one side when lifts for persons in every building open to the public shall be accessible. (EN 17210:2021, 10.4.2: "Accessible lifts shall be provided for all users and shall reach all accessible levels of a building").

ANEC (as EBU in their position paper) take this opportunity to argue that it would be appropriate to include the lifts accessibility requirements of EN 81-70 in the lift's safety requirements of EN 81-20 in the next version/revision (or merging the two standards). considering that some of the accessibility requirement, previously included in EN 81-70, have been already moved to EN 81-20 (such as requirements for light curtain, of lighting in car and levelling between car and platform car). The actions carried out under **Mandate M/473** strongly support the approach to include DfA requirements in EN 81-20 (safety rules for passenger lifts for persons) instead of having an additional standard with particular applications for accessible passenger lifts in EN 81-70.

2 | LEGAL REQUIREMENTS

2.1 EU Treaty of Lisbon (2008), Article 10:

*"In defining and implementing its policies and activities, the Union shall aim to combat discrimination based on sex, racial or ethnic origin, religion or belief, **disability, age** or sexual orientation."*

2.2 UN CRPD "The United Nations Convention on the Rights of Persons with Disabilities (2008)"

All user groups shall be taken into account and compatible solution with their needs shall be given. Key accessibility issues cannot be downgraded to recommendations only to some user groups, as this is discriminating to them.

<http://www.un.org/esa/socdev/enable/rights/convtexte.htm> 6 December 2006 (source):

"The Convention is development and a human rights instrument, also a policy instrument which is cross-disability and cross-sectoral and is legally binding.

The Convention marks a paradigm shift and does not explicitly define disability: Disability is an evolving concept, and disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders full and effective participation in society on an equal basis with others."

*Article 1 states: "Persons with disabilities include those who have long-term physical, mental, intellectual or **sensory impairments** ...which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others."*

Article 2: Definitions states: For the purposes of the present Convention

"Communication" includes languages, display of text, Braille, tactile communication, large print, accessible multimedia as well as written, audio, plain-language, human-reader and augmentative and alternative modes, means and formats of communication, including accessible information and communication technology;

"Language" includes spoken and signed languages and other forms of non-spoken languages;

"Discrimination on the basis of disability" means any distinction, exclusion or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. It includes all forms of discrimination, including denial of reasonable accommodation;

2.3 European Disability Strategy 2010 – 2020

It shows a common commitment at European and national level to improve accessibility for people with disabilities; implementing UN CRPD legal requirements in EU Directives, in the Accessibility Act for products and services and in accessibility standardisation.

Accessibility to the built environment, Information and Communication (notably ICT), and transport is required by article 9 of the UN Convention on Persons with Disabilities.

EC DG Employment, Social Affairs and Inclusion Accessibility

standardisation: <https://ec.europa.eu/social/main.jsp?catId=1485&langId=en>

(source):

"Common European accessibility standards help remove barriers for people with disabilities and others (e.g. the elderly). When applied across Member States, these standards also improve the functioning of the internal market, by removing barriers to free movement of goods and services.

Actions:

"The Commission has instructed European standards organisations, which include CEN, CENELEC and ETSI, to develop and implement accessibility standards.

These include standards for

- *ICT accessibility resulting in European Standard **EN 301 549** 'Accessibility requirements for ICT products and services'*
- *accessibility to the built environment, leading to European Standard **EN 17210** 'Accessibility and usability of the built environment – Functional requirements'*

- accessibility following "Design for all" standards, resulting in European Standard **EN 17161** 'Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users'
- accessibility of websites and mobile applications, updating European Standard **EN 301 549**

Key EU legislative instruments (the directive on web accessibility, the European accessibility act, public procurement directives) refer to the possible use of accessibility standards. The Commission encourages the participation of all relevant stakeholders in these processes, including persons with disabilities.

The EU also works together with other key players in the field of accessibility standardisation to support accessibility at the international level."

2.4 EU Lift Directive (DIRECTIVE 2014/33/EU):

whereas: "... (20) The harmonised standards relevant to this Directive should also **take into account the United Nations Convention on the Rights of Persons with Disabilities**;

Article 5 'Essential health and safety requirements'

1. Lifts covered by this Directive shall satisfy the essential health and safety requirements set out in Annex I.

2. Safety components for lifts covered by this Directive shall satisfy the essential health and safety requirements set out in Annex I and enable the lifts in which they are incorporated to satisfy those requirements.

CHAPTER II Obligations of economic operators

Article 7 Obligations of installers

1. When placing a lift on the market, installers shall ensure that it has been designed, manufactured, installed and tested in accordance with the essential health and safety requirements set out in Annex I.

See Annex I ESSENTIAL HEALTH AND SAFETY REQUIREMENTS

1.2 Carrier: ...Where the lift is intended for the transport of persons, and where its dimensions permit, the car must be designed and constructed in such a way that its structural features do not obstruct or impede access and use by disabled persons and so as to allow any appropriate adjustments intended to facilitate its use by them.

1.6. Controls

1.6.1. The controls of lifts intended for use by unaccompanied disabled persons must be designed and located accordingly.

1.6.2. The function of the controls must be clearly indicated.

4. Other risks

4.5. Cars must be fitted with two-way means of communication allowing permanent contact with a rescue service.

2.5 EU Machinery Directive (DIRECTIVE 2006/42/EC)

"(18) This Directive defines only the essential health and safety requirements of general application, supplemented by a number of more specific requirements for certain categories of machinery.... (see EU Lift Directive).

Article 24: 1.2. 'Carrier ... 2nd para:

Where the lift is intended for the transport of persons, and where its dimensions permit, the car must be designed and constructed in such a way that its structural features do **not obstruct or impede access and use by disabled persons** and so as to allow any appropriate adjustments intended **to facilitate its use by them.**"

2.6 European Accessibility Act (COM 2015 615 final)

This act has to be applied to accessible products and services: a big step forward to promote the inclusion of the 80 million persons with disabilities in Europe and ageing people and is recently under Implementation by the Member States. IEC EN 301 549 has to be considered for ICT products and services and an indirect reference to an accessible built environment is given therein as a precondition if a service or product is installed in a building.

3 | EC ACCESSIBILITY MANDATES + EN STANDARDS, GUIDES, TRs + ISO 21542

3.1 CEN/CLC Guide 6 supporting standardisation developers

CEN/CLC Guide 6 focus on conformity with common user expectations and support of individualization, when interacting successfully with the product, which is here the lift.

It considers as general requirements: "approachability – perceivability – understandability – controllability – usability – error tolerance - equitable use of the lift".

Diversity of human abilities and characteristics have to be met. It refers to: sensory abilities and characteristics (Seeing, hearing, touch, taste and smell functions), immunological system functions, physical abilities and characteristics, voice and speech and cognitive abilities.

This CEN/CENELEC Guide 6 is the basis of all accessibility standards and reports.

3.2 Relevant EC Mandates with EN standards with 'Design for All' approach and for accessibility in the built environment

considering Design for All/Universal Design approach in their standards.

3.2.1 **M/473 – Design for all:** Standardisation mandate to CEN, CENELEC and ETSI to include "Design for All" in relevant standardisation initiatives

- EN 17161:2019 '*Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users*'; see also other relevant guidance as the Protocol, etc. EN 17161 can help organisations align with a consistent approach to address accessibility across a range of applications. In particular, the standard enables organisations to address "Accessibility" as set out in the United Nations Convention on the Rights of Persons with Disabilities.

3.2.2. **M/420 – Accessibility in the built environment** (CEN/CENELEC JTC 11)

- **EN 17210.2021** '*Accessibility and usability of the built environment – Functional requirements*' which is the leading European standards on accessibility of the built environment, representing the "state of the art" of the relevant functional requirements; consider 10.4 Lifts, 10.5 Lifting platforms and 10.6 Escalators and moving walks)

↓ **Definition 3.38 "Multiple senses / principle of multiple senses"** *considering various sensory abilities in design decisions to support and enable users to perceive information (e.g. seeing, hearing, touch)*

↓ **10.4.10 Alarm system and communication** (refers in a) to two-way communication according the multiple sense principle, in b) and c) to the multiple sense principle. This means that diverse modalities of communications shall be provided, in order to allow each person to choose, among different alternatives that work by seeing, or hearing, or touch, the more appropriate/compatible with his/her needs. This approach shall be followed in prEN 81-70.

- CEN/TR 17621:2021 '*Accessibility and usability of the built environment – Technical performance criteria and specifications*', about how to fulfil the functional requirements in EN 17210:2021; consider 10.4 Lifts, 10.5 Lifting platforms and 10.6 Escalators and moving walks.
- CEN/TR 17622:2021 '*Accessibility and usability of the built environment – Conformity assessment*' about how to assess the functional requirements in EN 17210:2021)

3.2.3. **M/549 – to CEN/TC 10 referring also to "Accessibility in lift standards":**

EC DECISION C (2016) 5884 final of 21.9.2016 on a standardisation request to the European Committee for Standardisation as regards lifts and safety components for lifts in support of Directive 2014/33/EU of the European Parliament and of the Council;

- **Objective:** Requested harmonised standard shall take into account usability and accessibility in line with the United Nations Convention on the Rights of Persons with Disabilities
- **Revision of existing harmonised lift standards** and supporting implementation of essential health and safety requirements (see EU Lift Directive 2014/33/EU – Annex
 - I) Essential health and safety requirements, see 1.2 Carrier, 1.6 Controls (under development – technical revision of prEN 81-70).

3.2.4 Mandate M/376 – to CEN/

Standardisation mandate to CEN; CENELEC and ETSI in support of European Accessibility requirements for public procurement of products and services in the ICT domain.

- **EN 301 549:2018** Accessibility requirements for ICT products and services (harmonised European Standard with functional requirements)

↓ consider **13. ICT providing relay or emergency service access;**

↓ **13.2 Access to relay services:** *Where ICT systems support two-way communication and a set of relay services for such communication is specified, access to those relay services shall not be prevented for outgoing and incoming calls.*

NOTE 1: Two-way communication may include voice, real-time text, or video, singly or in combinations supported by both the emergency service and the ICT system.

NOTE 2: The purpose of this requirement is to achieve functionally equivalent communication access to the emergency service by persons with disabilities.

↓ **13.3 Access to emergency services:** *Where ICT systems support two-way communication and a set of emergency services for such communication is specified, access to those emergency services shall not be prevented for outgoing and incoming calls.*

NOTE 1: Two-way communication may include voice, real-time text, or video, singly or in combinations supported by both the emergency service and the ICT system.

NOTE 2: The purpose of this requirement is to achieve functionally equivalent communication access to the emergency service by persons with disabilities.

3.3 International and national standards on accessibility in the built environment

- 3.3.1 **ISO 21542:2021 Accessibility and usability in the built environment** (before publication); see introduction in EN 17210:2021 and CEN/TR 17621:2021, referring to ISO 21542 as the main source of information on requirements;
- 3.3.2. **DIN 32986:2015 Tactile lettering – Requirements on the presentation and application of Braille and raised lettering** (basis for a new EN standard – under development in CEN/TC 293 Assistive products and accessibility, WG 13 Tactile Lettering).

4 | DESIGN FOR ALL / UNIVERSAL DESIGN APPROACH

EN 17210:2021, 5.1 - Diversity of users, referring to the 7 principles of Universal Design and states:

"The 'Universal Design' approach – The 7 Principles of 'Universal Design'¹ - supports the designer in creating solutions that are suitable for the widest range of users, by focusing on seven design principles that should be considered in the design solution: simple and intuitive use, flexibility in use, size and space for approach and use, perceptible information, low physical effort, tolerance for error, and equitable use.

Thus, UD acts a useful tool for joining the variety of requirements for human abilities and characteristics to be met through single, unified, 'Universal Design' solutions, which benefit the widest range of users to the greatest extent possible".

All user groups must be considered, including people with disabilities (considering their different abilities and needs). Consider in EN 17210:2021, 5.2 Human abilities and design parameters, based on CEN/CENELEC Guide 6, and especially 5.2.2 Sensory abilities and characteristics with appropriate design considerations.

According to the Design for All / Universal Design approach, **all lifts for public use shall be accessible to the widest range of users**, no matter on where and how many they are.

Discussions about how many blind persons can read Braille or how many tall or short people can enter and use a lift in all buildings for public use, and about specific use of a building, are inappropriate.

For communication and emergency alarm devices persons who are hard of hearing and also deaf persons have to be considered with appropriate requirements (see EN 301 459 and EN 17210). Recommendations only for induction loop systems and non-consideration of the needs for deaf persons discriminates both user group with hearing impairments and

¹ The 7 Principles of Universal Design have been developed in 1997 in the North Carolina State University; see Centre for Excellence in Universal Design; <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>

reflects not the EU Lift Directive's Annex I "Essential health and safety requirements" on control devices (see 1.6.1).

EN 17210:2021, 10.4.2 a) Lifts-General, states:

"Accessible lifts shall be provided for all users and shall reach all accessible levels of a building".

EN 81-70 should not give guidance to some lifts, in some buildings, but to all possible lifts in all buildings for public use (in accordance with UN CRPD), letting to national standards and legislations to give further guidance on that.

This should be specified in the standard:

NOTE The number of accessible lifts according to the use of the building may be determined by national legislation/regulations.

Restrictions in use are allowed only for children which can use a lift only if accompanied by an adult, for safety reasons. However, it is useful to remember here that short persons, persons with cognitive impairments and persons with different cultural background have similar needs to children, e.g. reachability of controls, clear and plain language for information, different ways of communications, etc.

This should be specified in the standard:

NOTE Children can use a lift only if accompanied by an adult, for safety reasons.

5 | TECHNICAL GUIDANCE

5.1 Missing Design for All/Universal Design requirements under discussion in CEN/TC 10 WG 7

For the forthcoming technical revision of prEN 81-70, with reference to doc: CEN-TC10 - WG7_N0218_N218_Consolidated_comments_for_technical_revision_of_EN_81-70_rev5.

5.2 ANEC requests to consider deeper these main revision points

- 5.2.1 **Principles:** refer to DFA and UD 7 principles acc. EN 17210:2021 as the leading standard on accessibility in the built environment with functional requirements. (See ANEC comment template, 02)
- 5.2.2 **Scope:** ANEC asks also to include a reference to 'Design for All' in the Scope. (See ANEC comment template, 1)
- 5.2.3 **High and lower visual contrast for all design elements:** high contrast on inscriptions of floor numbers or symbols on push buttons, according to the agreed amendment using Michelson formula, lower contrast on "Active part of push button to their surrounding" and "Face plates to their surrounding", referring to

ISO/FDIS 21542, EN 17210 and CEN/TR 17621:2021 for consistency.

Comment: Michelson algorithm is considered the one that better takes into account the spectral sensitivity of the human eye. The Use of LRV difference and Michelson formula to be further checked throughout the standard and discussed with testing experts about the best approach for laboratory testing and in the field. Mixing the use of Michelson formula and LRV difference will probably increase the inherent difficulties for a full comprehension of the standard, making it more complex than needed. (See ANEC comment template, 5.1.2)

- 5.2.4 **Higher entrance to the lift cars** (doors and consequently cars), considering tall people, especially in northern countries (e.g. In Italy building doors are usually put into production with a height of 210 mm). There are no technical matters to consider this as an unacceptable new requirement. (See ANEC comment template, 5.2.1)
- 5.2.5 **The possibility to choose the appropriate door dwell time**, (operable also within lift car by users - longer or shorter time) according with different users' needs (see ANEC comment template, 5.2.2). This refers also to Annex C;
- 5.2.6 **Contrasting markings of partly or fully glazed doors and contrasting indicators:** supporting partially sighted persons to allocate the glass lift door opening; consider EN 17210:2021 and CEN/TR 17621:2021, 6.3.5.2 and 9.3.11 (See ANEC comment template new 5.2.3)
- 5.2.7 **Appropriate visual contrast of car doors to adjacent walls:** considering partially sighted persons to easier allocate and find the lift door; consider EN 17210 and CEN/TR 17621, 9.3.11 (See ANEC comment template new 5.2.4)
- 5.2.8 **Tactile floor and lift car identification at the frame on door openings** (see DIN 32986 and WG 7 doc. 179) See ANEC comment template new 5.2.5 clause
- 5.2.9 **The possibility to transport also small stretchers** in case of emergency, even in school and residential buildings to be added to car type 3 as an additional functionality of this car type. Consider ISO 21542, 8.5.4 and also ISO 8100-30: 2019, Figure 5, Series B". Also, larger accessible car types acc. ISO 8100-30 for healthcare facilities and others should be considered in 5.3.1 (table 3) or covered by a clear reference to this ISO standard. (See ANEC comment template, 5.3.1 table 3).
- 5.2.10 **Tip up seat requirements in health facilities:** align the requirements with EN 17210 and CEN/TR 17621 (consider higher load capacity of 150 kg and a plate with this declaration).
- 5.2.11 **Mirrored walls in lifts:** considering a vertical distance between the floor and the lower edge of a mirror (See ANEC comment template new 5.3.2.5)

- 5.2.12 **The provision of alternative ways of use** (following the multiple sense principle) in case of destination control system and touch screen device (see ANEC comment template, 5.4.1.2, Annex C)
- 5.2.13 **The provision of tactile letters/symbols**, in 5.4.2.1, Table 4 (see WG 7 doc. **N 177**, Eva's proposal to letter c), j) and k and WG 7 doc. **N 179** to "tactile inscriptions at lifts" referring to DIN 32986 based on extensive research, and Doris's proposal related to the informative Annex D, f) which ANEC asks to be moved in the main text; in order to give an alternative way to all information, making them readable to the widest range of users as possible. To be further discussed: dimension of buttons and raised tactile letters. Consider that DIN 32986 is under discussion for an EN standard on tactile letters. (see ANEC comment template, 5.4.2.1)
- 5.2.14 **The provision of information in Braille:** Braille characters shall be provided as a complementary feature to visually contrasting relief characters. (see ANEC comment template, new 5.4.2.1) Consider also comments on Annex D below;
- 5.2.15 **Emergency alarm systems and communication** for the wide range of users including persons with disabilities, according to the multiple-sense principle and the UD 7 Principles considering low vision and blind persons, hard of hearing and deaf persons, elderly and persons with cognitive impairments. A two-way-communication for deaf persons and hard of hearing persons has to consider voice (+ induction loop system), and real-time text or video, which is missing in prEN 81-70 (and also in EN 81-28).
- Hearing enhancement system as a recommendation only must be changed to a requirement and is considering only hard of hearing persons' needs. In addition add a requirement for a real-time text and video based device for emergency alarm systems for deaf persons. See EN 17210:2021, 10.4.10 "Alarm system and communication", which refers to EN 81-28 as also in prEN 81-70. (see ANEC comment template, new 5.4.2.5.5)
- 5.2.16 **ANNEX A "Categories of disability considered:** to be deleted as it is based on the previous outdated medical model which is not anymore considered in CRPD following the social model, equality and inclusivity.
- 5.2.17 **Annex C "Touch screen devices for destination control systems"** (see also CEN/TC 10 WG 7, doc. N 218 and consider the easy use of the "accessibility button", considering comments in doc. N 179 about the operation and easy use of the accessibility button with several functions for different users which may be critical for ease of use. Too many functions are covered now within one button which is confusing for different users such as
- ↓ audio mode for starting the operation mode for blind users,
 - ↓ possibility to choose longer door dwell time,

↓ possibility for enlarging fonts at the touch screen.

All these functions should be clearly separated for different user groups.

5.2.18 **Annex D “Guidance for increased accessibility and usability”** (see also 6): add these recommendations as mandatory requirements (“shall”) into the main part of EN 81-70; see WG 7 doc. N 179. Consider here also the DFA principles and the avoidance of materials / solutions causing optical confusion and check EN 17210:2021 and ISO 21542:2021:

- ↓ Braille in addition to tactile contrasting numbers or symbols;
- ↓ Markings of partly or fully glazed doors and contrasting horizontal indicators;
- ↓ Appropriate visual contrast of car doors to adjacent walls (considering partially sighted persons to easier allocate the door);
- ↓ Mirrored walls in lifts with an appropriate dimension for a vertical barrier between floor and mirrored wall. (see 5.2.5 above) and WG 7 doc. 179;
- ↓ Tactile floor and lift car identification at the frame on door openings (see DIN32986 and WG 7 doc. 179)

Finally, please note that for achieving the multiple sense principle, the standard doesn’t have to suggest precise components/devices commonly used already. Technical solutions are already on the market: the products most frequently chosen by the lift’s manufacturers will open new possibilities to guarantee a wider and cheaper product to guarantee accessibility to all.

Attached is **Annex A “Comments list on revision of EN 81-70:2020”** with specific proposals and suggestions to the technical points and issues raised in this ANEC Position Paper to support and speed up further discussions within CEN/TC 10 WG 7 during the full technical revision of prEN 81-70:2020.

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ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

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