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State of Subtitling in the EU

2026



subtitles sous-titres subtítulos

Untertitel sottotitoli legendas

ondertiteling undertext undertitler tekstitel

napisy titulky υπότιτλοι feliratok

subtitrări титлови titlovi napisi podnapisi

subtitri subtiitrid foinse deisyddiadau slovenci subtitr

EUROPEAN FEDERATION OF HARD OF HEARING PEOPLE

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About EFHOH

The European Federation of Hard of Hearing People (EFHOH), established in 1993, is a non-profit organization representing hard of hearing and late-deafened individuals across Europe. EFHOH advocates for awareness and practical actions to eliminate barriers to accessing affordable hearing care and rehabilitation and to create an accessible society through public services and assistive technologies.

Its main objective is to protect and promote the rights of individuals with hearing loss in Europe, facilitating legislative and social protections through collaboration with decision-makers, members and other relevant stakeholders.

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Foreword

Audiovisual media play a vital role in fulfilling the obligations of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), which recognises accessibility as a prerequisite for the full participation of persons with disabilities in all areas of life.

To support this objective, Article 7 of the Audiovisual Media Services Directive (AVMSD) requires EU Member States to ensure that audiovisual media services become progressively accessible, enabling persons with disabilities to participate in public, cultural, and social life on an equal basis with others.

Ahead of the forthcoming review of the AVMSD, EFHOH examined the implementation of Article 7 across Member States. While some progress has been made, our findings show that the Directive has fallen short of delivering the level of accessibility that viewers with disabilities need and expect.

The revised Directive introduced important improvements, including stronger wording on the progressive accessibility of media services and the requirement for national accessibility action plans. However, implementation has been uneven across Member States, resulting in significant disparities in access to audiovisual content.

The COVID-19 pandemic provided a crucial test of the Directive's effectiveness**.** During this period, governments across Europe relied heavily on live press conferences and public briefings to communicate essential information. Yet many of these broadcasts were not accompanied by live subtitling, leaving deaf and hard of hearing citizens without equal access to critical public information.

Our review also highlights a continued lack of attention to the quality of access services. Excessive delays, poor accuracy rates, and unreadable subtitles remain common challenges, undermining the effectiveness of accessibility measures that are in place.

It is therefore clear that **Article 7 of the AVMSD must be strengthened to** better reflect the needs of hard of hearing viewers and to ensure their full participation in public and cultural life. EFHOH calls for the introduction of clear benchmarks, stronger monitoring mechanisms, and robust quality standards as part of the upcoming review.

Subtitles are essential for access to information for hard of hearing and deaf people while providing universal access to many. At a time when innovative technologies make accessibility more achievable than ever, the question is no longer whether access can be provided, but rather how committed we are to ensuring that all citizens can fully exercise their right to participate in society, culture, and democratic life.

Lidia Best, EFHOH President

1. Introduction

Audiovisual media, from television broadcasts to video-on-demand services, are central to cultural and political participation in Europe. Subtitled films and series allow viewers to share cultural experiences, while accessible news and election debates help them stay informed and participate in democratic life.

Access is therefore about more than entertainment: it is also about information and inclusion. Accessible audiovisual content also plays an important role in exercising individual rights such as personal safety, access to information and freedom of expression. For example, access to clear and understandable emergency announcements enables people to take appropriate safety measures during disasters, while seeing people like themselves represented in the media can foster a sense of belonging and empowerment.

Despite this importance, hard of hearing viewers still face barriers when programmes lack subtitles or the subtitles provided are unreliable. These barriers affect equal access to information, cultural life and safety. The UN Convention on the Rights of Persons with Disabilities (CRPD)[1] establishes non-discrimination, full and effective participation and inclusion in society, equality of opportunities and accessibility among its fundamental principles (Article 3). Furthermore, Article 9 requires measures to ensure equal access to information and communications, including electronic and emergency services. In this context, ensuring the accessibility of audiovisual content —through measures such as subtitling— is essential to the effective exercise of rights, including access to information, freedom of expression and opinion (Article 21) and participation in cultural life (Article 30).

Audiovisual accessibility is also directly related to the Sustainable Development Goals (SDGs)[2] of the United Nations' 2030 Agenda. In particular, SDG 10 (Reduced Inequalities) promotes social inclusion and equality of opportunity, both of which can be undermined by barriers to accessing audiovisual content. Similarly, accessibility to audiovisual media services also aligns with SDG 16 (Peace, Justice and Strong Institutions) and emphasises access to information and inclusive public participation. Improving good quality audiovisual accessibility therefore contributes to a more inclusive, equitable and participatory society, in which people with hearing loss can exercise their rights on an equal basis with others.

At EU level, the Audiovisual Media Services Directive (AVMSD) —first adopted in 2010 and revised in 2018— addresses accessibility through Article 7, aiming to make audiovisual media services accessible to all. Since its adoption, accessibility for hard of hearing people has improved across Europe. However, significant barriers remain, and further progress is needed.

[1] United Nations, *Convention on the Rights of Persons with Disabilities*, 2006. URL: https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities.
[2] United Nations, *Transforming our World: The 2030 Agenda for Sustainable Development, A/RES/70/1*, 2015. URL: https://docs.un.org/en/A/RES/70/1.

1.1 Scope and methodology

This report examines gaps in subtitling accessibility for hard of hearing people under the Audiovisual Media Services Directive (AVMSD), as revised in 2018, and identifies concrete recommendations in its forthcoming review.

To do so, the report draws on two complementary approaches: an analysis of the Directive, national transposition and secondary evidence; and a survey of organisations representing hard of hearing people in six countries.

First, it analyses the provisions of the Directive regarding disability and accessibility to identify the obligations and recommendations addressed to Member States. It also reviews relevant documentation and literature on the transposition of the Directive across Member States, examining how its provisions have been interpreted and reflected in national legislation. Sources include documentation and publications by the European Regulators Group for Audiovisual Media Services and the European Audiovisual Observatory.

Second, the report presents illustrative findings from organisations representing hard of hearing people in six EU Member States to gain insights into the current state of subtitling in audiovisual media services across Member States.

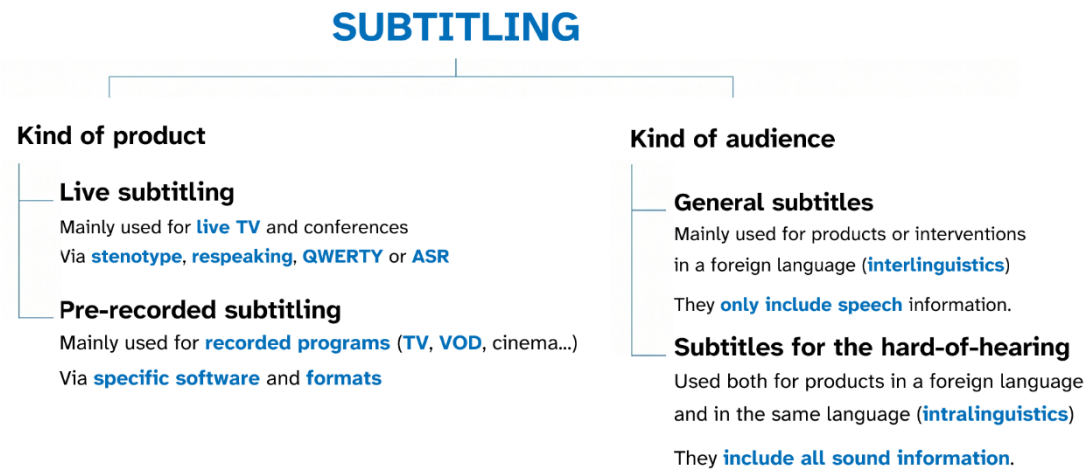
The survey covered organisations in: Austria, Czech Republic, Finland, France, Poland and Spain. These countries were selected to represent different regions of Europe and to reflect a diversity of cultural and linguistic contexts, and national accessibility frameworks. However, the survey was intended to identify emerging trends and gather illustrative examples of existing barriers rather than provide a statistically representative EU-wide assessment.

1.2 Subtitling as an essential accessibility measure for hard of hearing citizens

Subtitles are text displayed on screen in synchronisation with audiovisual content, conveying spoken dialogue and other relevant sound information. Although often associated with translating foreign-language films or television programmes, subtitling serves a much wider range of purposes and responds to different communication needs and preferences.

When it comes to hard of hearing people, limited access to sound can affect the understanding of speech as well as the perception of music, sound effects, characters voices —including tone, volume and the necessary features to identify speakers— and non-speech sounds —such as laughter or cry—. Subtitles designed for deaf and hard of hearing audiences should therefore convey relevant non-speech sounds and identify speakers where needed.

As illustrated in the chart below, subtitles are used across a wide range of audiovisual content, including live programmes, and can be produced and delivered in different ways. They serve different purposes and benefit a wide range of audiences.



General public subtitling can make content in foreign languages easier to understand, help viewers follow song lyrics and speech delivered quietly, with unfamiliar accents or over background noise, support people learning a second language or the local language and contribute to children's reading development.

Subtitles for deaf and hard of hearing audiences also benefit older viewers, people learning a language and others who find spoken dialogue difficult to follow. For children with hearing loss, subtitles can support language and literacy development, while some viewers with cognitive disabilities may also find them helpful.

Producing accessible subtitles requires linguistic and technical expertise. Without suitable oversight and quality control, subtitles prepared by untrained staff or automatic speech recognition systems may contain errors, appear too late or be difficult to read.

1.3 The Audiovisual Media Services Directive (AVMSD)

The Audiovisual Media Services Directive[3] —first adopted in 2010 and later revised in 2018— was developed on the basis that certain objectives regarding audiovisual media services could be more effectively achieved at EU level than by the Member States acting individually. These objectives are:

- Creating an internal market for audiovisual media services, in particular:
  - Facilitating the transition from national markets to a common market for programme production and distribution.
  - Guaranteeing fair competition and safeguarding the public interest.

- Protecting the general interest, in particular:

[3] Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive): http://data.europa.eu/eli/dir/2010/13/oj

- Minors, consumers and human dignity.
- The right to information.
- Cultural diversity and media pluralism.
- The rights of people with disabilities.

- Promoting public awareness and media literacy.

The Directive covers audiovisual media services intended for the general public, including television broadcasting and on-demand services, whether provided by commercial operators or public service broadcasters. The term ‘audiovisual’ refers to moving images — with or without sound— while audiovisual media services may also include accompanying text-based features, such as subtitling and electronic programme guides.

More specifically, the Directive primarily applies to audiovisual media services whose principal purpose is to provide programmes that inform, entertain or educate the general public, as well as to audiovisual commercial communications. Its scope depends on the legal definition of the service, including editorial responsibility and jurisdiction.

Certain services fall outside the definitions of audiovisual media services, including radio, private correspondence, user-generated content, non-economic private sharing, online newspapers or magazines and websites where video is merely incidental to another service. Therefore, mass-media services such as podcasts, digital press or social media content are not regulated by the Directive, although they also inform, entertain or educate the general public.

2. Disability and accessibility in the AVMSD

2.1 Protection and promotion of the rights of people with disabilities

Regarding disability, Recital 104 of the original Directive identifies the promotion of the rights of persons with disabilities as an objective of general interest.

> *(104) Since the objectives of this Directive, namely the creation of an area without internal frontiers for audiovisual media services whilst ensuring at the same time a high level of protection of objectives of general interest, in particular the protection of minors and human dignity as well as promoting the rights of persons with disabilities, […]*

Article 9 further prohibits audiovisual commercial communications from including or promoting discrimination on grounds including disability, and the 2018 revision introduced in Article 6 an explicit reference to the EU Charter of Fundamental Rights on non-discrimination[4].

2.2 Accessibility: Protection of the right to information

Regarding accessibility, the Audiovisual Media Services Directive originally addressed the issue only in general terms. Even though Article 7 was dedicated to accessibility and Recital (46) referred to specific accessibility measures, the Directive did not establish concrete obligations or requirements such as minimum subtitling targets, quality standards or deadlines for improving accessibility.

> *Article 7*
>
> *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.*
>
> *(46) The right of persons with a disability and of the elderly to participate and be integrated in the social and cultural life of the Union is inextricably linked to the provision of accessible audiovisual media services. The means to achieve accessibility should include, but need not*

[4] "Article 21 - Non-discrimination. 1. Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited. […]". European Union, *Charter of Fundamental Rights of the European Union*, 2012. URL: http://data.europa.eu/eli/treaty/char_2012/oj.

be limited to, sign language, subtitling, audio-description and easily understandable menu navigation.

However, the 2018 revision introduced significant changes to Article 7, strengthening its provisions and adding four new paragraphs.

The 2018 revision shifted Article 7 from encouraging media service providers to improve accessibility —*"Member States shall encourage media service providers […] to ensure that their services are […] made accessible […]"*— to requiring Member States to ensure continuous and progressive improvement without undue delay —*"Member States shall ensure, without undue delay, that services provided by media service providers […] are made […] more accessible*"—. This creates a binding obligation to act, although the Directive still does not set a deadline for achieving full accessibility.

However, the changes introduced to the first paragraph are, in some respects, a double-edged sword. Article 7(1) now requires services to become "continuously and progressively more accessible through proportionate measures". This recognises the need for sustained improvement. However, without measurable targets or clear proportionality criteria, financial or technical constraints may be invoked to justify limited progress.

Article 7

Member States shall ensure, without undue delay, that services provided by media service providers under their jurisdiction are made continuously and progressively more accessible to persons with disabilities through proportionate measures. [...]

In addition to the changes to Article 7(1), four paragraphs were added. Most of these additions seek to strengthen the monitoring of accessibility and accountability of Member States regarding audiovisual media services under their jurisdiction, although their effectiveness in ensuring actual improvements may be limited.

On the one hand, a specific and binding reporting obligation was introduced. Member States must report to the European Commission on the implementation of the first paragraph every three years, starting in December 2022. Therefore, by the time of writing this report, two reporting deadlines have passed, in December 2022 and December 2025.

Article 7(2) requires Member States to ensure that media service providers report regularly to national regulatory authorities on the implementation of accessibility measures. However, it does not define the reporting frequency or establish common indicators for assessing progress.

Article 7

2. Member States shall ensure that media service providers report on a regular basis to the national regulatory authorities or bodies on the implementation of the measures referred to in paragraph 1. By 19 December 2022 and every three years thereafter, Member States shall report to the Commission on the implementation of paragraph 1. […]

At the same time, the third paragraph requires Member States to encourage media service providers to develop accessibility action plans. Where such plans are developed, they must be communicated to national regulatory authorities or bodies. […]

3. Member States shall encourage media service providers to develop accessibility action plans in respect of continuously and progressively making their services more accessible to persons with disabilities. Any such action plan shall be communicated to national regulatory authorities or bodies. […]

This difference between the requirement that Member States "shall *ensure* that media service providers report […] on implementation" and the requirement that they "shall *encourage* media services to develop accessibility action plans" is significant. While reporting is mandatory, the development of accessibility action plans remains voluntary for media service providers.

In practice, therefore, there is an accountability gap between reporting inaccessibility and taking specific action to solve it. Additionally, without clear targets or criteria for determining what constitutes a proportionate measure, it may be difficult to assess whether Member States and media service providers are doing enough to improve accessibility.

On the other hand, the fourth paragraph introduces an additional safeguard by requiring Member States to establish a "single, easily accessible, including by persons with disabilities, and publicly available online point of contact for providing information and receiving complaints" concerning the accessibility issues referred in the article.

Once again, this provision has both strengths and limitations. It provides persons with disabilities and their representative organisations with an opportunity to raise concerns, report accessibility barriers and advocate for their rights. However, the Directive does not specify how complaints should be handled, establish deadlines for responding to them or require specific corrective action following a complaint. This may limit the effectiveness of the mechanism, depending on how it is implemented at national level.

Article 7

4. Each Member State shall designate a single, easily accessible, including by persons with disabilities, and publicly available online point of contact for providing information and receiving complaints regarding any accessibility issues referred to in this Article. […]

Finally, Article 7(5) establishes a clear and specific obligation: emergency information made available through audiovisual media services must be accessible to persons with disabilities. […]

5. Member States shall ensure that emergency information, including public communications and announcements in natural disaster situations, which is made available to the public through audiovisual media services, is provided in a manner which is accessible to persons with disabilities.

In conclusion, even though the 2018 revision of the Audiovisual Media Services Directive introduced clearer and stronger requirements for improving accessibility, its provisions remain broad and vague and did not establish binding harmonised quantitative subtitling targets, minimum quality requirements and detailed enforcement procedures. These gaps make progress difficult to measure and compare across Member States.

In that sense, the Committee on the Rights of Persons with Disabilities of the United Nations made the following observations on the legislative and policy measures taken by the European Union to promote the rights of persons with disabilities[5]:

52. The Committee is concerned that:

(a) Many persons with disabilities lack equal access to information and communication due to the limited availability of accessible formats, […]

(b) The Audiovisual Media Services Directive lacks timelines and targets for implementation […];

53. The Committee recalls its previous recommendation and recommends that the European Union:

[5] *Concluding observations on the combined second and third periodic reports of the European Union*, Commitee on the Rights of Persons with Disabilities, United Nations, 2025, URL: https://docs.un.org/en/CRPD/C/EU/CO/2-3.

[…]

(b) Set timelines and harmonized European Union-wide criteria for audiovisual accessibility in the Audiovisual Media Services Directive, including quantitative and qualitative targets; […]

The CRPD Committee's recommendation underscores the need for harmonised timelines and measurable standards. Under the existing AVMSD, Member States retain substantial discretion over how accessibility improvements are planned, assessed and monitored.

2.3 Transposition of the AVMSD and obligations for Member States

As the AVMSD is an EU directive, Member States are responsible for the effective, impartial and transparent implementation of its provisions into national law, in accordance with the Treaty on the Functioning of the European Union. According to the European Audiovisual Observatory, all Member States have transposed Article 7 of the AVMSD, although most of these transpositions remain vague and vary considerably in terms of detail.

Its comparative study[6] examined 28 national responses covering the 27 EU Member States, including separate responses for the Flemish and French Communities of Belgium. The findings showed that only 23 of the 28 countries (82%) include in primary or secondary legislation an explicit call for continuous and progressive or gradual increase. In that sense, not all States have set obligations on specific aspects mentioned in the Directive, namely accessible provision of emergency information (only 75%), accessibility plans (64%), national regulatory bodies report to the EU Commission every three years (39%) and a specific mechanism for complaints (18%).

Additionally, Member States may apply more detailed, stricter or practical rules in the fields covered by the Directive to media service providers under their jurisdiction —as long as those rules are consistent with general principles of Union law—. That would be especially useful to compensate for the general wording of Article 7 of the AVMSD, but not all Member States have adopted more specific requirements.

In that sense, the study reports that only 19 of the 28 transpositions analysed (68%) regulate audiovisual media services providers, only 17 (61%) set specific quotas of any kind[7], and

[6] *Accessibility measures as implemented by AVMS providers for persons with disabilities*, European Audiovisual Observatory, Strasbourg, 2023. URL: https://rm.coe.int/accessibility-measures-as-implemented-by-avms-providers-for-persons-wi/1680aefb42.
[7] The data are from 2023, where seven States claimed to be in process of developing more specific regulations in that sense.

only 13 (46%) regulate aspects such as times of broadcast, types of programming or priorities of content.

Some Member States have also introduced non-binding measures. Of the 28 national frameworks examined, 5 (18%) referred to subtitling codes of practice or quality-assurance documents, 6 (21%) referred to voluntary accessibility action plans and 19 (68%) offered general complaints mechanisms that could cover disability-related complaints. Such initiatives can support progress but cannot replace enforceable accessibility duties.

Outside of Article 7, we find that the original scope of the Directive as a whole —that is, any kind of moving images which are intended for reception by a significant proportion of the general public, delivered by providers under any form of economic activity— is reduced by some Member States when it comes to accessibility. A study from the European Regulators Group for Audiovisual Media Services (ERGA) [8] examined 26 of the transpositions and determined that in 6 of these 26 countries (23%) accessibility obligations applied only to certain types of services, while in 2 countries (8%) they applied only to public service providers.

Furthermore, 23 of the 28 transpositions analysed by the study of the European Audiovisual Observatory[9] (82%) establish different requirements depending on the type of audiovisual media service provider, distinguishing between public broadcasters, private broadcasters and on-demand services. More specifically, 12 of the 28 countries (43%) establish different quotas for public and private broadcasters, while only 7 (25%) set quotas for video-on-demand service providers. Therefore, most transpositions do not grant equal access to audiovisual content for people with disabilities, who might only have access to the content, viewing experiences and points of view conveyed by certain media service providers.

National proportionality rules also vary. 11 of the 28 national frameworks (39%) refer to constraints such as financial or technical resources or audience size when permitting exemptions from accessibility duties. A further 3 (11%) allow media authorities to grant exceptions. Without clear criteria and safeguards, such exemptions risk undermining equal access.

Member States may use legislation, administrative or judicial mechanisms, co-regulation or self-regulation when implementing the Directive, subject to their EU-law obligations. Regardless of the approach, public authorities remain responsible for ensuring effective compliance and oversight.

[8] *New rules on accessibility (Article 7.1). A common understanding of 'proportionate' measures*, European Regulators Group for Audiovisual Media Services, 2021. URL: https://media-board.europa.eu/document/download/03a38fe5-7f18-4ac8-99a7-b7f5a532c4c0_en?filename=ERGA-SG1-Report-Article-7-accessibility.pdf&prefLang=lv.
[9] *Accessibility measures as implemented by AVMS providers for persons with…* Op. cit.

According to the study from ERGA[10], 16 of the 26 countries (62%) had adopted a regulatory framework, while 6 (23%) had adopted a co-regulatory system. In 2021, however, 4 countries (15%) had no such system in place. Similarly, 19 (73%) had designated a single national media regulatory body to monitor the implementation, 5 (19%) had more than one body, and 2 (8%) had no designated monitoring body at all.

Regarding the obligation to provide accessible emergency information, according to the study of the European Audiovisual Observatory[11], only 21 of the 28 national frameworks analysed (75%) included an explicit requirement to provide emergency information in an accessible manner. Two of these also provided that the State would cover any extraordinary cost associated with ensuring accessibility. 5national frameworks (18%), however, leave the requirement "to the best of the ability of each audiovisual media service provider", opening the door, once again, for the providers to argue that accessibility was not possible.

In conclusion, the broad wording of the AVMSD allows considerable room for interpretation and has resulted in significant differences in national transposition. These differences concern legislative requirements —including the types of broadcasters or programmes covered, the accessibility measures required, and the quotas established— and their implementation and monitoring, including how compliance is assessed and enforced.

As a result, viewers' access to subtitles may depend heavily on the Member State and the provider concerned, reinforcing the need for clearer EU-wide minimum requirements.

[10] *New rules on accessibility (Article 7.1). A common understanding of 'proportionate' measures*… Op. cit..
[11] *Accessibility measures as implemented by AVMS providers for persons with*… Op. cit.

3. The current state of subtitling in audiovisual media across European countries grounded in lived experience

EFHOH has published several reports on the state of subtitling in audiovisual media services across Europe since the first publication of the AVMSD[12]. The last report, in 2015, compared the state of the matter between 2011 and 2013 and noted some progress, but it also identified persistent gaps.

That report also called for common standards and a 100% subtitling quota on public TV by 2020, which has not been achieved so far. Therefore, EFHOH has conducted new research, six years after the proposed deadline and eight years after the last revision of AVMSD, in order to identify improvements and persistent gaps both on paper —through the revision of documents in previous sections— and in practice.

3.1 Availability

According to new research conveyed by EFHOH in 2026[13], respondents reported uneven subtitling availability across audiovisual media services, with some content remaining inaccessible. All the organisations interviewed identified legal or regulatory requirements as an important factor in increasing subtitling availability and reported progressive improvements since 2018.

These findings suggest that legal requirements may have supported progress and that the Directive, therefore, has contributed to improving accessibility. At the same time, however, they show that access remains incomplete and further progress is still needed.

> *"[Media services] Providers have ensured that they can fulfil legislation. […] Authorities who are monitoring, if the legislation is complied with, are then satisfied. But TV viewers' perspective is a totally different perspective, and we are currently missing information."*
>
> *Anonymised organisation, Finland*

As mentioned before, the Directive allows media service providers to demonstrate progressive improvements in accessibility through different measures, such as sign language interpretation or audio description, without necessarily increasing the availability of subtitles to the same extent. Furthermore, it does not specify a minimum rate of improvement.

[12] European Federation of Hard of Hearing people, *State of subtitling access in EU. 2011 Report* (2011). URL: https://efhoh.org/wp-content/uploads/2017/01/EFHOH-State-of-Subtitling-2011-English.pdf
European Federation of Hard of Hearing people, *State of subtitling access in EU. 2015 Report* (2015). URL: https://efhoh.org/wp-content/uploads/2017/01/EFHOH-State-of-Subtitling-2015-English.pdf

[13] Six organisations representing hard of hearing people were interviewed on aspects regarding the state of subtitling in media services in their countries —Austria, Czech Republic, Finland, France, Poland and Spain—, including quantitative and qualitative aspects of subtitles, as well as quality aspects of the complaining mechanisms.

"Polish law requires a total accessibility quota of 50% combined for subtitles, sign language, and audio description. There are no exact data on the actual amount of subtitles because broadcasters report combined figures for subtitles and sign language."

Dostępni.eu, Poland

"For nationwide private television broadcasters, the starting level was 30%, and progressive increases are based on this level. No minimum increase is specified; even a fraction of a percentage point is sufficient."

Anonymised organisation, Czech Republic

Media service providers may invoke proportionality to limit subtitling. Respondents described criteria ranging from audience size and territorial coverage to programme genre and whether a service is linear or on demand. These differences can leave particular types of content less accessible.

The findings therefore point to the need for transparent, objective criteria and safeguards against routinely excluding certain genres, including sport and live music.

"[The public national broadcaster] does not subtitle sport programs […]. Sport programs are out of the regulation and we know the reason is because sport programs need more live subtitling."

Anonymised organisation, Finland

"Every year, […] there is a [concert], which is also sent to all of the world, but there are no subtitles. When we complained, they said that they did not find that hard of hearing people would also be interested in music."

Anonymised organisation, Austria

Accessibility requirements are often stricter for traditional television channels than for on-demand services, although Article 7 of the AVMSD applies to both.

When on-demand services operate in several EU countries, monitoring their compliance can be more difficult. However, the Member State under whose jurisdiction a provider falls remains responsible for ensuring compliance with the Directive.

"Additionally, there are no live subtitles on VOD [Video-on-demand] services. The subtitling requirements for VOD are low and phased in gradually over time, applying only to pre-recorded content."

Dostępni.eu, Poland

"[Subtitling availability] needs still improvement when it comes to paying services, especially on-demand services, where availability of subtitled contents is not so uniform."

Confederación Española de Familias de Personas Sordas, Spain

"Legislation is much stronger for traditional TV broadcasters, but when you go to video platform, video-on-demand services, it is more unclear. I know the [national] monitoring authority […] tries somehow to activate video-on-demand services providers asking them to report their plans to improve accessibility, but it is not a so direct application."

Anonymised organisation, Finland

Therefore, these findings highlight the need for clearer criteria for what it means for audiovisual media services to become "more accessible to persons with disabilities". More specifically, the Directive should establish clearer requirements for different accessibility measures, including sign language interpretation *and* subtitling, recognising that they should not be treated as interchangeable.

At the same time, it should also establish objective criteria for assessing the proportionality of accessibility measures, taking into account legitimate technical and resource constraints while ensuring that accessibility remains a priority.

Among media service providers that do offer subtitling, the interviewed organisations reported that the percentage of subtitled content varies considerably between providers and countries. Nevertheless, some general trends can be identified. In one country, respondents estimated that more than 90% of audiovisual content was subtitled on average, while in another, the estimated percentage was below 50%. It is important to note that half of the organisations surveyed also reported the use of AI-powered subtitling tools to increase the amount of subtitled content. However, greater availability does not necessarily guarantee that subtitles are accurate, readable or accessible.

These differences illustrate how the Directive's broad wording —requiring audiovisual media services to become "continuously and progressively more accessible" through "proportionate measures"— leaves considerable discretion to Member States regarding the amount of accessible content required and the pace of future improvements.

This can be illustrated by comparing the national regulations in several countries:

"Public television channels […] and private channels with an average annual audience share exceeding 2.5% of the total television audience must subtitle 100% of their programs, excluding advertising and exemptions provided for by law."

Anonymised, France

"Polish law requires a total accessibility quota of 50% combined for subtitles, sign language, and audio description. […] Currently, TV channels are required to provide between 10% and 40% of captions and PJM [Polish Sign Language] combined, depending on the channel's specialization."

Dostępni.eu, Poland

"[The Spanish law] establishes relevant quantitative obligations: a minimum of 80 % of subtitled programs for free-to-air linear television and of 90 % for public for free-to-air linear television providers; and a minimum of 30 % for under subscription linear television and on-demand services."

Confederación Española de Familias de Personas Sordas, Spain

"The current legislation does not provide sufficient protection for the level of accessibility already achieved and does not set clear minimum requirements for progressive improvement. The Action Plan is established in broadcasting legislation, but the law does not specify the extent of individual accessibility services provided by private broadcasters. Each broadcaster determines this in its own Action Plan."

Anonymised organisation, Czech Republic

"[National Public Broadcasting company] develops subtitling all the time, but not all national programs in commercial channels are subtitled because the law requires only 75% subtitling. Also, still, based on the legislation only 30 % of subscription-based programming services are subtitled"

Anonymised organisation, Finland

Respondents also reported differences by programme type. According to the interviewed organisations, subtitling availability depends mainly on the criteria applied by individual producers or broadcasters (50%), whether programmes are live or pre-recorded (50%), their relevance to the general public (33%), the programme genre (33%) or the time slots in which they are aired (33%). Although some of these reflect the public interest —which could be

considered an effective choice for priority—, others may result in certain types of content being consistently less accessible.

Overall subtitling coverage may conceal significant differences between live and pre-recorded programmes. High subtitling rates, including those achieved through repeated films and series, do not necessarily guarantee access to live news, current affairs or political debates. The European Audiovisual Observatory also notes that sign language interpretation is particularly common in news and current affairs. However, sign language and subtitling address different accessibility needs and should not be treated as interchangeable.

Additionally, some organisations reported difficulties accessing subtitles on television devices, due both to technical limitations —such as technical incompatibility of devices, the transmission of subtitle streams or infrastructure failures— and lack of clear instructions on enabling subtitles. This highlights the importance of ensuring that subtitling requirements are accompanied by legislative measures addressing technical compatibility, reliable transmission and accessible information for users.

"In a meeting with RTVE [national public free-to-air television broadcaster], we were told that, even though they provide subtitles for almost 100 % of content, due to old infrastructure that goes down and needs some hours to restart, they cannot always be aired in some regions. We were told that it would be replaced in the next year."

Confederación Española de Familias de Personas Sordas, Spain

"There are frequent technical problems with the transmission of subtitles from the subtitling provider to the television broadcast."

Anonymised organisation, Czech Republic

"[In broadcasting systems] There are different transmission 'channels'. One channel is for the picture, one for the subtitle, one for the audiodescription, etc. […] But in [country] there were only two possible channels. […] Now it was announced that from 1st October more channels will be possible, but you have to install something and not each device can have it."

Anonymised organisation, Austria

Overall, the survey findings indicate that subtitling availability remains uneven across the 6 EU Member States examined. 4 of the 6 organisations (67%) reported differences in subtitling provision between broadcasters, as well as inconsistencies across programmes and broadcast times. Moreover, high overall subtitling rates do not necessarily reflect

accessibility of live content, as pre-recorded and repeated programmes may account for a substantial share of subtitled broadcasts. This highlights the importance of assessing subtitling coverage separately for live and pre-recorded programmes, particularly news, current affairs and political debates. Beyond availability, respondents also identified significant concerns regarding subtitling quality, discussed in the following section.

3.2 Quality

When discussing subtitling, it is important to keep in mind that it is a professional discipline that involves not only transcribing speech but also ensuring that subtitles are readable and understandable. For deaf and hard of hearing viewers, this also includes conveying relevant non-speech (environmental) sounds and information.

This is why several international and national standards and guidelines[14] address aspects such as reading speed, maximum characters per line, display time, position, line breaks, contrast between text and background, synchronisation between sound, images and subtitles. Correct spelling, grammar and punctuation are equally important.

"The fact alone that a program officially has subtitles does not ensure that it will be actually accessible for persons with a hearing disability. […] The existence of subtitles does not ensure per se that they are accessible […] Hence, the challenge should not just focus on increasing the percentage of subtitled programs, but also on guaranteeing their literality, information integrity, proper punctuation, synchronization, readability and linguistic quality."

Confederación Española de Familias de Personas Sordas, Spain

However, as mentioned before, the Directive does not establish specific requirements for subtitling quality. Responsibility for defining and monitoring quality standards is therefore largely left to Member States and individual media service providers, resulting in significant differences between countries and providers.

"There is no legal basis for assessing subtitle quality, beyond the interest of academic institutions."

Dostępni.eu, Poland

[14] ISO/IEC 20071-23:2018. *Information technology — User interface component accessibility — Part 23: Visual presentation of audio information (including captions and subtitles).* URL: https://www.iso.org/es/contents/data/standard/07/07/70722.html

"In France, there is a 2011 charter—developed by [audiovisual services regulatory authority] in collaboration with broadcasters—that aims to standardize and improve the quality of subtitling for the deaf and hard of hearing."

Anonymised organisation, France

"[The Spanish law] establishes obligations on the progressive improvement of subtitling quality, according to the UNE [national standardisation organism] regulation."

Confederación Española de Familias de Personas Sordas, Spain

Nevertheless, all the organisations interviewed identified subtitling quality as a major concern in their countries. The most frequently reported problems included missing information relevant to deaf and hard of hearing viewers, such as speaker identification or non-speech sounds (67%), poor synchronisation between sound and the subtitles (67%), omissions, errors or excessive rephrasing of the original content (50%), and spelling, grammar or punctuation errors (50%).

In this context, it is also important to highlight that respondents raised concerns about the use of AI-powered automatic speech recognition (ASR) without adequate human oversight, which can result in poor-quality subtitles.

"Public television produces live captions using respeaking (repetition–speech recognition–text conversion–moderation). [...] However, in 2021, another private broadcaster implemented a new system based on removing the respeaker from the process (speech recognition–text conversion–moderation). This method is cheaper, but the captions are not better."

Dostępni.eu, Poland

"The growing use of AI and automatic speech recognition systems can enable an increment in coverage, but these technologies should not be considered enough on their own if they do not consistently ensure necessary quality requirements for an accessible subtitling. It is necessary to keep proper supervision and quality control mechanisms."

Confederación Española de Familias de Personas Sordas, Spain

"The experiments with AI are not satisfactory. Quality is not good at the moment, or not good enough, since sometimes there are wrong words."

Anonymised organisation, Austria

Additionally, 50% of the organisations reported other readability issues such as subtitles displayed at an unacceptable delay, disappearing too fast from the screen, or positioned in ways that interfere with other on-screen information.

"In the left corner is the name of who is speaking and from where he comes, and the subtitles are on the bottom as well, and then you cannot see the name."

Anonymised organisation, Austria

In conclusion, the survey findings suggest that, while the availability of pre-recorded subtitling has improved since the adoption of the Directive, access to live news and political debates and announcements has largely not improved, which is a cause for concern. Improvements in quality of subtitling have not necessarily followed at the same pace. The absence of specific quality requirements in the Directive may contribute to these shortcomings, as Member States and media service providers are left to establish their own standards and monitoring mechanisms.

Investments from Member States and media service providers in accessibility do not deliver meaningful access for hard of hearing people if subtitles remain inaccurate, unreadable or unreliable. Quality standards are therefore as important as coverage targets in effectively protecting the right to information for persons with disabilities.

3.3 Information and complaints point of contact

One of the clearest requirements of the Directive is the obligation for each Member State to designate a single, easily accessible point of contact for providing information and receiving complaints about accessibility issues in audiovisual media services. However, the findings suggest that the implementation and accessibility of these mechanisms vary between countries.

According to the research conducted by EFHOH, all organisations responding to this question reported the existence of complaint mechanisms in their countries. However, only 3 out of the 5 organisations that responded to the question (60%) reported a single point of contact.

In that sense, the lack of a centralised complaint mechanism for all media service providers in the country makes it more difficult to collect statistical information about recurring accessibility issues, share knowledge about possible solutions and ensure consistent handling of complaints. It may also lead to differences in how complaints are addressed by media service providers or the competent authorities.

"There is a national point of contact for accessibility issues regarding audiovisual media services that cover the whole territory. […] For services that only cover a region, the regional authorities might intervene, while for local services both regional authorities and other entities might speak, depending on the case."

Confederación Española de Familias de Personas Sordas, Spain

Only 2 of the 5 organisations (40%) considered the national point of contact easily accessible. If lodging a complaint or seeking information requires excessive time and effort, hard of hearing viewers may be discouraged from reporting accessibility barriers and exercising their rights.

"In practice, many people tend to resign to recurring shortcomings about subtitling and do not complain, either because they do not know about existing mechanisms, because they find them difficult or inaccessible, or because they do not expect their complaints to make a difference."

Confederación Española de Familias de Personas Sordas, Spain

Additionally, most organisations reported concerns about whether complaints are properly recorded and followed up. Article 7(4) requires Member States to establish a point of contact, it does not specify procedures or deadlines for investigating or resolving complaints. All 5 organisations had submitted complaints, but 4 (80%) indicated that the issues raised remained unresolved.

"There is a submission via email and you receive a prompt response."

Anonymised organisation, Austria

A point of contact alone is insufficient if it is difficult to access or complaints are not acted upon. Member States should therefore ensure accessible procedures, timely investigations and meaningful corrective action.

4. Conclusion and recommendations

The analysis of Article 7 and the experiences reported by 6 national organisations show that the 2018 revision of the AVMSD has not yet ensured consistent access to subtitled audiovisual media services across Europe. Despite progress, subtitling availability continues to vary between countries, providers and programme types. High overall subtitling rates may also conceal important gaps in live programming, particularly news, political debates and other time-sensitive information.

The findings also demonstrate that availability alone does not guarantee accessibility. Respondents reported persistent quality issues, including inaccurate or incomplete subtitles, poor synchronisation, delays and missing speaker identification or relevant non-speech sounds. These shortcomings can make audiovisual content difficult to understand even when subtitles are provided.

Such barriers have consequences beyond access to entertainment. Reliable subtitling is essential for hard of hearing people's right to information, participation in cultural and democratic life, and access to critical information during emergencies. Accessibility must therefore be assessed not only by how much content is subtitled, but also by its quality, reliability and timely availability.

Although Article 7 provides an important legal framework, its general requirement for progressive improvement has not ensured consistent implementation. The forthcoming AVMSD review offers an opportunity to establish **clearer, measurable and enforceable accessibility obligations**, supported by effective monitoring, accountability and the meaningful participation of organisations representing persons with disabilities.

The need for stronger EU requirements has also been emphasised by European disability organisations in their joint call for the upcoming AVMSD revision:

"Article 7 of the AVMSD is key to implement the UN CRPD in the audiovisual sector. However, while existing EU rules are an important initial step, it is evident that they have failed to produce the desired effect and equal access to audiovisual media services is not yet guaranteed. […]

In other words, the AVMSD must move beyond general duties of progressive improvement and instead promote measurable and enforceable minimum accessibility obligations at the European level."

European Blind Union, European Disability Forum, European Union of the Deaf, European Federation of Hard of Hearing people, and Inclusion Europe[15]

[15] *Joint call to the European Commission to advance accessibility in the upcoming AVMSD revision*, EBU, EDF, EFHOH, EUD and Inclusion Europe, 2026. URL: https://www.edf-feph.org/publications/joint-call-to-the-european-commission-to-advance-accessibility-in-the-upcoming-avmsd-revision/

The revision of the AVMSD is an important opportunity to ensure that high-quality subtitling becomes a consistent and enforceable requirement across Europe. EFHOH urges the European Commission and Member States to translate these recommendations into concrete obligations, ensuring that hard of hearing people can access audiovisual information and content on an equal basis with others.

4.1 EFHOH recommendations for the AVMSD revision

EFHOH recommends amending Article 7 of the Audiovisual Media Services Directive (AVMSD) as follows:

1. Establish binding subtitling targets and explicit proportionality quotas. Require 100% subtitling of all types of programmes and services within five years, with binding interim milestones proportionate to providers' audience reach, resources and market position.

2. Define separate mandatory quotas for each accessibility service. Establish distinct, progressively increasing requirements for subtitling, sign language interpretation and audio description, ensuring that progress in one service cannot compensate for insufficient provision of another.

3. Guarantee subtitling of live political and emergency information. Introduce explicit requirements for accurate and timely subtitling of live news, political briefings, public announcements and emergency communications, including during crises. Provide contingency measures for technical failures.

4. Establish enforceable quality and technical standards. Define measurable benchmarks for accuracy, completeness, readability, synchronisation, speaker identification, relevant non-speech sounds and maximum delay permitted in live subtitling.

5. Ensure meaningful participation of organisations representing hard of hearing persons in the transposition of Article 7 into national legislation, guaranteeing that lived experience informs regulatory design.

6. Strengthen the requirement for an independent, single-entry complaints mechanism, enabling hard of hearing viewers to report accessibility failures easily and ensuring that complaints are handled transparently, timely and effectively.

7. Ensure effective monitoring and enforcement of accessibility requirements. Require national regulatory authorities to regularly verify broadcasters' and on-demand providers' compliance with subtitling quotas and quality standards. Make provider accessibility action plans mandatory and require annual detailed public reporting.

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