Legislation - Denmark

Relevant Acts

Denmark implements EU accessibility legislation through national laws and directives:

- Lov om tilgængelighedskrav for produkter og tjenester (Act on Accessibility Requirements for Products and Services) - the national implementation of the European Accessibility Act (EAA). See the overview on the authority site: https://www.sik.dk/tilgaengelighed-produkter-og-tjenester.
- Webtilgængelighedsloven (Danish Web Accessibility Act) - applies to public authorities' websites and mobile applications. Guidance available from Digitaliseringsstyrelsen: https://digst.dk/tilsyn/webtilgaengelighed/forstaa-den-tekniske-standard
- The corresponding EU-level directives are the European Accessibility Act (Directive (EU) 2019/882) and the Web Accessibility Directive (Directive (EU) 2016/2102). These underpin the national laws. https://www.sik.dk/tilgaengelighed-produkter-og-tjenester

These laws and directives create the legal framework for accessibility in Denmark, ensuring obligations for both public and private entities regarding accessible products and services, including ebooks, reading systems and online consumer services.

For the publishing/ebook sector, there is sector-specific guidance such as from the Danish Publisher's Association, Danske Forlag (see their guidance on accessibility for e-books): KRAV OM TILGÆNGELIGHED I E-BØGER: RESSOURCEKATALOG

More information on legislative requirements

For practical guidance and explanation of the new requirements for products and services in Denmark:

- Sikkerhedsstyrelsen's page on accessibility for the book industry: Tilgængelighed og bogbranchen - e-bøger, e-læsere m.v. https://www.sik.dk/erhverv/produkter/tilgaengelighed-produkter-og-tjenester-

0/bogbranchen

- The general “Tilgængelighed for produkter og tjenester” portal: https://www.sik.dk/tilgaengelighed-produkter-og-tjenester

These resources assist publishers and distributors with understanding their obligations under Danish law, how to approach compliance and under what circumstances exemptions may apply.

Interpretation for small publishers and ebooks

- The Act on Accessibility Requirements applies broadly to all “economic operators,” including small independent presses and open access publishers. According to the national guidance, from 28 June 2025 all ebooks made available to consumers must comply with the accessibility requirements, irrespective of publisher size. https://www.sik.dk/erhverv/produkter/tilgaengelighed-produkter-og-tjenester-0/bogbranchen
- At the same time, there is a provision for exemptions for micro-organisations (mikrovirksomheder). These may claim exemption if compliance would impose a “uforholdsmæssig stor byrde” (disproportionate burden) or require a “grundlæggende ændring” (fundamental alteration). The assessment is carried out on a case-by-case basis. https://www.sik.dk/erhverv/tilgaengelighed-produkter-og-tjenester/vejledninger/tilgaengelighed-undtagelser-og-mikrovirksomheder
- It is therefore advisable for small presses or publishers to document and justify any claim that making a given ebook accessible would pose an undue burden.

Standards referenced and how auditing works

WCAG and EN 301 549 alignment

- Denmark uses the harmonised standard EN 301 549, translated to Danish where relevant. Digitaliseringsstyrelsen notes that EN 301 549 includes requirements beyond those in web guidelines, covering software, reading systems, digital content rendering and assistive technology interoperability. https://digst.dk/tilsyn/webtilgaengelighed/forstaa-den-tekniske-standard
- While web accessibility mandates have strong overlap with WCAG 2.1 (Web Content Accessibility Guidelines 2.1, level AA), compliance with WCAG alone may not suffice to meet all the legal requirements under Danish law https://digst.dk/tilsyn/webtilgaengelighed/forstaa-den-tekniske-standard

There are sector-specific requirements for ebooks, as set out in Annex 1, Section 4, letter f of the Accessibility Act. The requirements for ebooks are as follows:

- An ebook must, when it contains audio in addition to text, also provide synchronised text and audio. Annex 2 provides, as an example, that it should be ensured that a person with dyslexia can read and hear the text simultaneously.
- Digital ebook files must not prevent assistive technology from functioning properly. Annex 2 provides, as an example, that there may be possibilities for synchronised text and audio or for refreshable braille output.
- Ebooks must ensure access to content, navigation within files' content and layout - including dynamic layout - delivery of structure, flexibility and options in the presentation of content. Annex 2 provides, as an example, that it must be ensured that a blind person has access to the index or can switch chapters.
- Ebooks must allow alternative representations of content and interoperability with a wide range of assistive technologies in such a way that the content is perceivable, understandable, usable and robust.
- Ebooks must be searchable through metadata providing information about the ebooks' accessibility features. Annex 2 provides, as an example, that it must be ensured that information about accessibility features is available in the electronic file, so that people with disabilities can understand the available features.
- Measures related to the management of digital rights must not prevent accessibility features. Annex 2 provides, as an example, that it must be ensured that there are no technical protection measures, digital rights management restrictions, or lack of interoperability between systems and services that prevent the text from being read aloud by assistive tools, so that blind users can read the book.

https://www.sik.dk/erhverv/produkter/tilgaengelighed-produkter-og-tjenester-0/bogbranchen

Compliance oversight and auditing

- For ebooks and consumer-oriented digital products/services, the oversight authority is Sikkerhedsstyrelsen. https://www.sik.dk/tilgaengelighed-produkter-og-tjenester
- For public-sector websites/apps, compliance is monitored under Webtilgængelighedsloven by Digitaliseringsstyrelsen. https://digst.dk/tilsyn/webtilgaengelighed/monitorering-og-tilsyn/

Together, these frameworks determine the technical and legal standards for accessible ebooks and digital services in Denmark.

Accessibility statements

The accessibility statement requirements in Denmark follow the EU legislation (EU Web Accessibility Directive) with no additional requirements.

Exemptions - backlist titles

- All ebooks delivered to consumers from 28 June 2025 must, as a general rule, comply with the accessibility requirements - regardless of when the ebook was produced or published. In this sense, the accessibility law does not distinguish between backlist ebooks - that is, ebooks published before the requirements apply and ebooks published for the first time on 28 June 2025 or later.
- It will be possible to exempt ebooks from the accessibility requirements if complying with them would either result in a fundamental alteration of the ebook or impose a disproportionate burden on the business. Backlist ebooks must therefore comply with the accessibility requirements when delivered to consumers from 28 June 2025, unless one of the exemptions applies.
- Many backlist ebooks can likely be exempted from the accessibility requirements. This is because it can generally be assumed that making lower-demand backlist ebooks accessible would constitute a disproportionate burden. However, publishers must document and be ready to justify such exemptions if requested by the authorities.

All references to: https://www.sik.dk/erhverv/produkter/tilgaengelighed-produkter-og-tjenester-0/bogbranchen

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