Legislation - France

Relevant acts

France, as an EU Member State, has transposed the European Accessibility Act (EAA) and the EU Web Accessibility Directive into French law (Loi n° 2023-171 du 9 mars 2023).

Interpretation of whether these acts apply to small publishers and ebooks

The European Accessibility Act, as transposed into French law, applies to “economic operators,” including publishers and distributors of e-books. E-book services are expressly covered. From 28 June 2025, e-book services made available to consumers must comply with accessibility requirements, unless the provider qualifies as a micro-organisation within the meaning of the Act.

At the same time, the Act provides a specific exemption for micro-organisations (fewer than 10 employees and an annual turnover or balance sheet total not exceeding €2 million). For services - including e-book services - qualifying micro-organisations are exempt from the accessibility obligations. This exemption is automatic and does not require a prior assessment of disproportionate burden. Separately, any operator (regardless of size) may invoke an exemption where compliance would impose a disproportionate burden or require a fundamental alteration; such assessments must be carried out on a case-by-case basis and documented.

https://www.economie.gouv.fr/dgccrf/les-fiches-pratiques/la-nouvelle-directive-europeenne-accessibilite-pour-des-produits-et-des-services-accessibles-aux-personnes-en-situation

It is therefore advisable for small presses or publishers in France to (i) verify whether they qualify as a micro-organisation under the statutory thresholds and retain evidence of that status, and (ii) where relying on disproportionate burden or fundamental alteration, document and justify that assessment in case of regulatory review.

Standards referenced and how audited

Technical standards

- France requires compliance with WCAG 2.1 AA, which is incorporated via EN 301 549, the EU-harmonised standard for digital accessibility.

E-book-specific requirements

Under the EAA, e-books must ensure, where relevant:

- synchronised text and audio, if both are included
- compatibility with assistive technologies
- flexible navigation and presentation of content
- alternative renditions and interoperability
- metadata that makes accessibility features discoverable
- non-blocking DRM for accessibility features

These apply to both the file and (to a degree) the reading environment; publishers control what they can within their file productions.

Monitoring and enforcement in France

For the European Accessibility Act (e-books, software, e-commerce):

- Market Surveillance: The DGCCRF acts as the national authority to monitor compliance of goods and services under the EAA.
- Penalties: Conforming to consumer-protection law, non-compliant products may be sanctioned or removed from the market. Consumers may lodge complaints, and the DGCCRF has powers to investigate and enforce corrective measures.

Individuals or organisations with a legitimate interest can support accessibility complaints or actions, though the precise legal route depends on the nature of the provider and the service.

Backlist titles: Compliance and grace period in France

1. Transition Period / Deadline for backlist titles
   - According to ARCOM, e-books published before 28 June 2025 must be made accessible by 28 June 2030. https://www.arcom.fr/vos-services-par-media/consultations-publiques/consultation-publique-prealable-lentree-en-vigueur-de-lobligation-de-rendre-accessibles-les-livres-numeriques

2. Exemptions / Disproportionate Burden
   - According to ARCOM: there are possible exemptions for certain books, for example:

    - Micro-organisations (very small publishers) may be exempt. https://www.arcom.fr/nous-connaitre-nos-missions/garantir-le-pluralisme-et-la-cohesion-sociale/accessibilite-du-livre
    - If making the book accessible would “entraine une modification fondamentale de leur nature” (i.e., fundamentally change the nature of the book). https://www.arcom.fr/nous-connaitre-nos-missions/garantir-le-pluralisme-et-la-cohesion-sociale/accessibilite-du-livre
    - If there is a “charge disproportionnée” (disproportionate burden) for the publisher. https://www.arcom.fr/nous-connaitre-nos-missions/garantir-le-pluralisme-et-la-cohesion-sociale/accessibilite-du-livre
3. Obligations & Enforcement

- ARCOM is responsible for control / verification of accessibility compliance for both new and existing digital books. https://www.arcom.fr/nous-connaitre-nos-missions/garantir-le-pluralisme-et-la-cohesion-sociale/accessibilite-du-livre

4. Publisher / metadata responsibilities
    - According to the Syndicat national de l’édition (SNE): besides making backlist titles accessible, publishers are expected to declare the niveau de conformité (level of accessibility) via the metadata. https://www.sne.fr/actu/accessibilite-des-livres-numeriques-declaration-du-niveau-de-conformite/
5. Minister of Culture’s Position
    - The Ministère de la Culture explicitly confirms that there is a five-year grace period (“période transitoire”) for backlist titles, stating that operators “auront alors cinq ans pour rendre leurs collections de livres numériques conformes aux exigences d’accessibilité.”https://www.culture.gouv.fr/actualites/le-livre-accessible-entame-un-nouveau-chapitre

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