Accessibility of Audiovisual Media Services in Luxembourg

Comparative National Report 2022–2025

1. Introduction

This report provides an updated overview of the accessibility of audiovisual media services (AVMS) in Luxembourg, covering the period from 2022 to 2025. It follows the same structure and methodology as the 2022 national report, which represented Luxembourg's first comprehensive mapping of accessibility measures under Article 7 of the Audiovisual Media Services Directive (AVMSD). The present report evaluates progress achieved since then, identifies persisting challenges, and highlights future areas of improvement.

Access to information and communication is a key enabler of fundamental human rights such as freedom of expression and education. Yet, people with disabilities still face significant barriers to access, limiting their ability to fully exercise these rights. This situation often arises from limited awareness among audiovisual media service providers of the needs of persons with disabilities, combined with a failure to provide them with reasonable accommodations that would enable them to access and to make use of their rights.

Article 9 of the United Nations Convention on the Rights of Persons with Disabilities on Accessibility states that, in order to "*enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, (…) to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas*."

In line with these obligations, the Luxembourg's Independent Media Authority (ALIA) continues to monitor and encourage the progressive implementation of accessibility measures by audiovisual media service providers under Luxembourg jurisdiction.

In August and September 2025, ALIA reminded all audiovisual media service providers under Luxembourg jurisdiction of their obligation, in accordance with article 27quater of the amended Law of 27 July 1991 on Electronic Media, to prepare action plans on the continuous and progressive improvement of their services for persons with disabilities. On that same occasion, ALIA requested them to fill in a questionnaire asking them, inter alia, about the measures already implemented by their service(s) in order to make the latter accessible to persons with disabilities and the accessibility measures they intend to implement in the next 3 years.

2. Context and multilingual environment

When writing about the accessibility of audiovisual media services in Luxembourg, it is not possible to ignore the unique overall language situation characterised by the practice and the recognition of three official languages: Luxembourgish, French and German.

As already described in the 2022 report, Luxembourg's linguistic diversity continues to present both opportunities and challenges for accessibility. The coexistence of Luxembourgish, French, and German as official and working languages affects the choice of subtitling language, the feasibility of sign-language interpretation[1] and the technical availability of automated tools.

While in live and news broadcasting, broadcasters typically provide a transcription in the spoken language, providers targeting a Luxembourgish audience face additional challenges. Programs are often, at least, partly broadcast in Luxembourgish, but people with disabilities, for instance people with a severe hearing disability, due to their education, feel often more at ease reading texts in German than in Luxembourgish. Consequently, to ensure genuine accessibility, media services frequently need to produce German, Luxembourgish and/or French subtitles for live broadcasts conducted in Luxembourgish.

3. Participation and scope

In 2025, ALIA reached out to 132 audiovisual media service providers in Luxembourg. Of these 132 providers, 62, responsible for 390 audiovisual media services, provided responses.

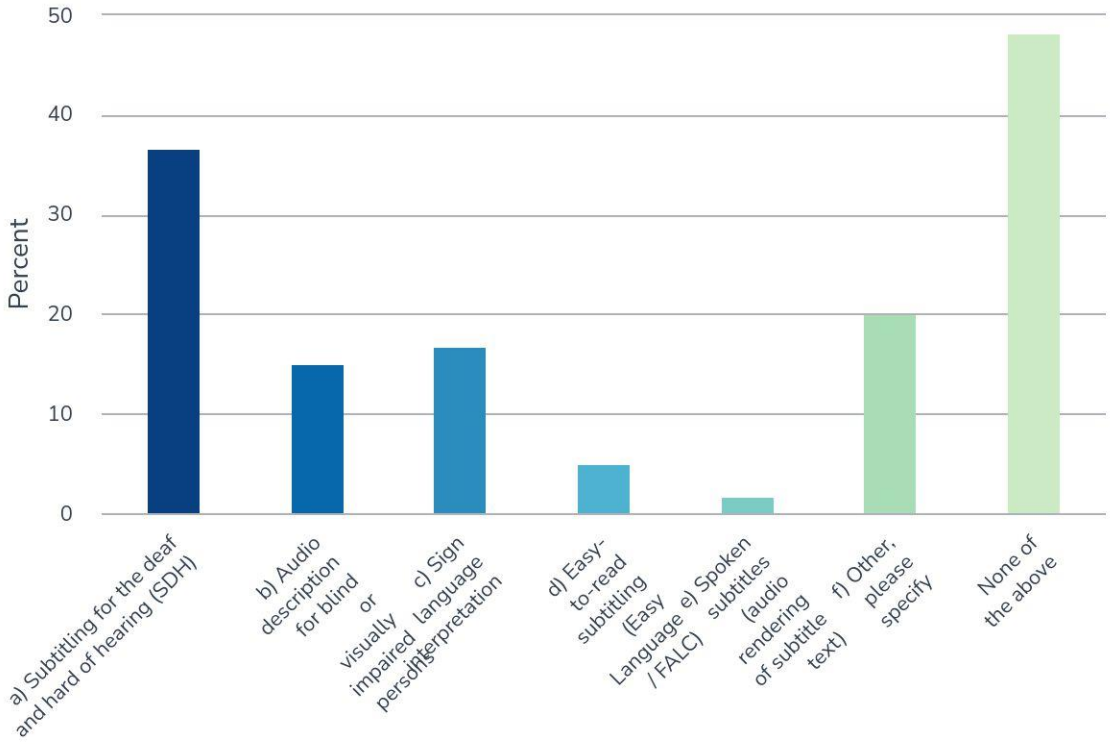
In comparison, the 2022 report analysed data from 382 services, of which 313 provided valid responses, and 146 (46.6%) were identified as having implemented at least one accessibility measure. In 2025, 390 services were identified, with 336 providing sufficient information for evaluation. Among these, 120 services (30.8%) were confirmed as having implemented one or several accessibility measures. The difference between both reporting periods does not primarily reflect a methodological change but rather an evolution in the composition of the market: some services that had previously implemented accessibility measures have ceased operations, while newly established or newly registered services often do not yet offer such measures.

Overall, the level of accessibility across services under Luxembourg jurisdiction therefore remains broadly stable, with ongoing disparities between large, well-resourced providers and smaller or thematic operators.

[1] DGS (Deutsche Gebärdensprache – German Sign Language) is the main sign language used in Luxembourg, and it has been legally recognised there for the deaf community.

4. Implemented measures in 2025

Among the 62 respondents, 29 providers (48.3%) reported having no accessibility measures in place, while 33 providers (51.7%) indicated that they have implemented at least one measure. Within this latter group, subtitling for the deaf and hard of hearing (SDH) is the predominant measure: 22 of the 33 (66.7 %) providers with measures offer SDH. In terms of the full sample, this corresponds to 35.5% (22/62) of all respondents providing SDH. Other measures (e.g., audio description, sign-language interpretation, easy-to-read subtitling) are present but at markedly lower levels, suggesting that current accessibility efforts are concentrated on subtitling rather than a broader portfolio of services.



Value	Percent	Count
a) Subtitling for the deaf and hard of hearing (SDH)	36.7%	22
b) Audio description for blind or visually impaired persons	15.0%	9
c) Sign language interpretation	16.7%	10
d) Easy-to-read subtitling (Easy Language / FALC)	5.0%	3
e) Spoken subtitles (audio rendering of subtitle text)	1.7%	1
f) Other, please specify	20.0%	12
None of the above	48.3%	29

The 2025 evaluation identified 120 services implementing one or several accessibility measures.

The analysis confirms that subtitling for the deaf and hard of hearing (SDH) remains by far the most widespread measure, followed at a distance by audio description (AD) and sign-language interpretation (SL). Only a limited number of services apply other forms such as easy-to-read subtitles (FALC) or spoken subtitles.

Type of Measure	Number of Services (2025)	% of All Services (390)	Trend since 2022
Subtitling (SDH)	120	30.8 %	stable
Audio Description (AD)	~70	18 %	moderate expansion through large networks (BBC, Sky, Channel 4)
Sign-Language Interpretation (SL)	~10	2.6 %	slight growth (notably Esch TV & Chamber TV)
FALC / Easy-to-Read	~2	< 1 %	pilot phase
Spoken Subtitles	1	< 1 %	marginal
Other (e.g. automatic YouTube captions, multilingual VOST)	5–6	~1.5 %	slight increase

5. Main challenges identified by the providers

When asked about the main challenges in implementing accessibility measures, providers reported a range of technical, financial, linguistic, and operational difficulties. The most frequently cited barrier is cost, both in terms of initial investment and ongoing operational expenses. Smaller providers, in particular, stressed that implementing subtitling, audio description or sign language interpretation represents a disproportionate financial burden relative to their audience size and revenue. A second major challenge concerns technical and engineering complexity, especially for live or continuous broadcasting workflows. Providers noted that producing accurate, synchronised subtitles for 24/7 channels or live news coverage requires complex systems and skilled personnel, leaving little room for error. Several respondents also referred to resource constraints, notably the lack of trained staff or specialists capable of handling subtitling, translation, or accessibility technologies. This shortage is particularly acute in multilingual environments such as Luxembourg, where ensuring linguistic accuracy and consistency across multiple languages is demanding. A few providers mentioned language-related limitations, pointing out that speech-to-text and text-to-speech technologies are not yet fully developed for Luxembourgish, which slows down progress toward automated or hybrid accessibility solutions.

Finally, some smaller or niche providers (e.g. those broadcasting adult entertainment, music, or devotional content) argued that their programming is already inherently accessible through visual or audio elements, and thus faces fewer accessibility barriers. Overall, the responses reveal that while there is clear awareness of accessibility obligations, financial capacity, technical feasibility, and linguistic diversity remain the principal obstacles to a wider implementation of measures across the audiovisual sector.

6. Developments and improvements since 2022

Out of all responses, a significant number of providers reported tangible improvements or new initiatives since 2022 to enhance accessibility. These developments can be grouped into five main categories:

a) Expansion of subtitling and captioning (SDH)

This remains the most frequently reported area of progress. Broadcasters such as BBC, ITV, Sky, NHK, RTL, Channel 4, and Mediawan Lux. noted continued or expanded use of subtitling. Several channels, including Sky, ITV, and RTL, increased coverage from partial to nearly 100% for their main linear services. NHK introduced Automatic Speech Recognition (ASR) subtitling, underscoring the complexity of the task and the need for customised language models. Smaller providers such as Talking Pictures TV and Crime District documented measurable growth—from 0% in 2022 to nearly 8% projected for 2025. RTL9 also enhanced subtitling through *versions originales sous-titrées* (VOST) and partial SDH implementation.

Subtitling continues to grow steadily, though unevenly: major networks have nearly reached saturation, while smaller Luxembourg-based services are still implementing basic captioning tools.

b) Technological innovation and AI-based automation

A notable trend since 2022 is the increasing adoption of AI-driven accessibility tools. RTL Lëtzebuerg launched research and development projects on speech-to-text and text-to-speech technologies for Luxembourgish in collaboration with the University of Luxembourg (Uni.lu), the Zenter fir d'Lëtzebuerger Sprooch (ZLS), and the Fonds national de la Recherche (FNS). NHK and Zee TV reported work on ASR and automated translation systems for multilingual captioning. Providers such as Mediawan Lux., RTL9, and Sky tested machine-generated subtitles and other AI-based workflows, while QVC, MSM Asia, and Utsav indicated that they are still exploring AI integration for future automation.

Service providers are increasingly investing in automation and language-specific AI solutions, reflecting the needs of Luxembourg's multilingual media environment.

c) Improved accessibility of digital interfaces (web, mobile, apps)

An increasing number of respondents focused on improving the accessibility of their digital platforms in line with modern standards. CNBC carried out a comprehensive audit against WCAG 2.2, leading to significant interface improvements across its web and app platforms.
The *Chambre des Députés* achieved a 73% accessibility score for its website (chd.lu) and integrated the Eye-Able assistive tool. Municipalities such as Wiltz and Schuttrange introduced high-contrast modes and accessibility menus on their websites. Providers like Mediawan Lux. and RTL9 redesigned their interfaces to improve navigability.

We witness a broad implementation of web accessibility standards and user-focused design across both public and private providers.

d) Partnerships and collaborations

Many advances stemmed from collaboration. RTL Lëtzebuerg and the *Chambre des Députés* partnered with Uni.lu and ZLS to develop Luxembourgish ASR systems. Esch TV cooperated with APEMH[2] on inclusive content production. CLT-UFA, Proximus, and Post improved accessibility options on set-top boxes and VOD platforms, allowing users to customise subtitle display features. Sky and Hearst Networks integrated accessibility requirements already at the workflow design stage.

Partnerships among broadcasters, academia, and tech providers are emerging as key engines of accessibility innovation in Luxembourg.

e) Hardware and user-interface adaptations

Technical improvements were also noted in broadcasting and user equipment. Proximus Luxembourg (Tango TV) and Post (POP TV Go) introduced new decoders with advanced accessibility menus, enabling adjustments in subtitle colour contrast, font size, and other settings. Sky UK enhanced accessibility across devices by supporting subtitles, multiple audio tracks, and simplified remote controls. ITV and Channel 4 implemented live audio description and sign-language features for major events such as the 2024 Paralympic Games.

Hardware and interface adaptations significantly enhance the usability of audiovisual content for deaf and visually impaired audiences.

[2] *Association des Parents d'Enfants Mentalement Handicapés* is a Luxembourg-based organisation created in 1967 by parents of children with intellectual disabilities and has since developed services and support structures for people with intellectual disabilities and their families

7. Information to users on accessibility

7.1. Availability of accessibility information

In the 2025 reporting round, only 36.2% of audiovisual media service providers (21 out of 58 respondents) stated that they provide clear information about the accessibility of their services in their user guides or general terms and conditions.

A majority, 63.8% (37 respondents), confirmed that no such information is currently made available.

This result indicates that, despite a growing awareness of accessibility obligations, a substantial information gap persists. Many providers implement accessibility measures (such as subtitling or audio description) but do not systematically communicate these features to users.

7.2. Quality and level of detail of the information provided

Among the 21 providers who reported offering accessibility-related information, 85.7% (18 respondents) specify further details, such as the availability, quality, or activation methods of accessible features or compatible devices.
Only 14.3% (3 respondents) limit their information to general statements without practical guidance for users.

This second finding shows that when accessibility information is provided, it tends to be comprehensive and user-oriented, often including:

- instructions on how to activate subtitles, audio description, or sign-language features;
- compatibility notes for set-top boxes, smart TVs, and VOD platforms;
- information on the quality or coverage of accessibility options.

7.3. Key findings

On one hand, information quality is high among providers that communicate on accessibility. On the other hand, overall coverage remains low.

Compared with 2022, this reveals a slight improvement in transparency, yet it also highlights the need for clearer guidance or incentives to ensure that all service providers systematically include accessibility details in their user-facing documentation.

8. Suggestions and Requirements to Enhance Accessibility

8.1. Quantitative Results

Among the respondents, several specific needs and expectations were identified that could facilitate the improvement of accessibility across audiovisual services:

Type of Support or Requirement	Share of respondents	Number of responses
Guidelines on accessibility standards and good practices	**53.1%**	**17**
Enhanced cooperation with associations representing persons with disabilities	**40.6%**	**13**
Access to databases or certified AI solutions to improve the quality of accessible services	**59.4%**	**19**
Other suggestions	**25.0%**	**8**

The results show that technical and regulatory guidance remains the most requested form of support, closely followed by AI-based or data-driven tools that can improve subtitling, audio description, and automation processes. A significant proportion of respondents also call for closer cooperation with associations of persons with disabilities, reflecting a desire to better test and validate accessibility solutions with real users.

8.2. Qualitative Feedback and Thematic Analysis

The qualitative responses reveal four main categories of suggestions:

a) Technical and AI-based Solutions

Several respondents explicitly mentioned the need for automatic and accurate subtitling software, AI-assisted accessibility tools, and access to certified databases or language models that can handle multilingual contexts (e.g. Luxembourgish, French, English).

Example: "Automatic accurate subtitling software."

b) Guidelines and standardisation

Respondents underline the importance of common standards, style guides, and platform-level accessibility requirements.

Example 1: "Accessibility taskforces to develop common standards, style guides and platform capabilities would be valuable."
Example 2: "La Chambre des Députés luxembourgeoise a d'ores et déjà intégré des bonnes pratiques d'accessibilité comme prérequis dans le développement des outils numériques destinés au grand public."

c) Partnership and cooperation with user organisations

A number of respondents, including large broadcasters (e.g. Sky) and public institutions (e.g. Chambre des Députés), mention regular dialogue with associations for persons with disabilities, such as RNIB, RNID, or Age UK, as a valuable channel for co-design and validation.

Example: "Sky regularly engages with the RNIB, RNID, and NADP to understand accessibility improvements for content and services."

d) Capacity and resource constraints

Some smaller providers indicate limited capacity or funding to implement additional measures and note that they would be willing to adopt improvements provided these do not add excessive workload.

Example 1: "We are fully willing to integrate measures as long as they do not represent an additional workload."
Example 2: "Accessibility services would not significantly benefit the teleshopping industry, as there aren't the financial resources to justify implementation."

8.3. Key findings

Overall, the responses reflect a mature awareness of accessibility challenges and a growing demand for structured, collective solutions.

Key trends include:

- A clear interest in AI-supported subtitling and transcription technologies;
- The perceived need for EU-level or national guidance to harmonize implementation;
- The importance of inclusive testing frameworks in cooperation with disability organisations.

At the same time, smaller operators stress the need for proportionate requirements and possibly shared technical infrastructures to overcome resource limitations.

The 2025 results highlight a strong interest in practical tools, particularly AI-driven solutions and harmonised guidelines, to enhance accessibility in the audiovisual sector.

This aligns with the broader European trend toward digital accessibility innovation and indicates that collaborative, cross-sector initiatives could effectively accelerate progress.

9. Use of artificial intelligence for accessibility

9.1. Use of AI Tools

In 2025, 19% of audiovisual media service providers (11 out of 58) reported using artificial intelligence (AI) to enhance the accessibility of their services, for example, through automatic subtitling, speech recognition, text-to-speech synthesis, machine translation, or sign-language interpretation.

The majority, 81% (47 respondents), stated they do not yet use AI for such purposes.

This confirms that AI-based accessibility tools are still in an early adoption phase, primarily used by large international broadcasters and national public service providers with access to technological or academic partnerships.

Most Luxembourg-based or smaller private operators have not yet integrated AI tools, mainly due to resource, cost, or language-related constraints.

9.2. Human Post-Verification of AI Outputs

Among the abovementioned 11 providers using AI tools, 72.7% (8 respondents) systematically carry out human post-checks to validate or correct AI-generated results, while 27.3% (3 respondents) rely on fully automated outputs.

This demonstrates a responsible and quality-focused approach among providers using AI — where automation is seen as a supporting tool rather than a replacement for human expertise, particularly in subtitling, voice recognition, and translation tasks.

9.3. Opportunities and limitations identified

From the qualitative responses, the following key opportunities were highlighted:

a) Efficiency and Cost Reduction

AI helps reduce production time and lower operational costs, especially for subtitling and transcription.

It enables providers to scale accessibility coverage without proportionally increasing staff costs.

Example: "AI allows us to remove some labour from the process of creating subtitles, which can reduce cost and enable us to provide more subtitling."

b) Innovation and user autonomy

AI enables real-time subtitling, speech recognition, and text-to-speech solutions, as well as voice-command interfaces (e.g. Sky Glass, Sky Stream).

These technologies enhance accessibility for users with visual or motor impairments, allowing hands-free navigation and voice-based content control.

Example: "For blind and vision-impaired customers, Sky uses a text-to-speech engine that reads out navigation prompts and metadata."

c) Multilingual support and inclusivity

Particularly in Luxembourg's multilingual context, AI offers potential for automatic translation and simplification of content.

Example: "AI can assist with automatic translation and subtitling across multiple languages, valuable in Luxembourg's multilingual environment."

9.4. Challenges identified by the media service provider

Respondents also pointed to significant challenges and technical barriers:

a) Accuracy and quality control

AI-generated subtitles or speech recognition still lack precision, especially with accents, background noise, or non-dominant languages.

Example 1: "Immature technology solutions not quite suited to broadcast delivery; cost comparably high."
Example 2: "Occasional inaccuracies due to pronunciations from all countries."

b) Language gaps for Luxembourgish and minor languages

AI tools are less effective in Luxembourgish, which currently has limited dataset availability.

Example 1: "YouTube is not very performant in Luxembourgish speech recognition."
Example 2: "Luxembourgish-based tools do not yet have the maturity of well-established tools."

c) Ethical and Legal Constraints (GDPR)

Some respondents noted data protection and compliance concerns when using cloud-based AI solutions.

Example: "Limitation: Luxembourgish language – GDPR."

d) Need for human supervision

High-quality accessibility (especially for news or cultural programmes) requires human editing, dictionary creation, and manual quality assurance.

Example: "For NHK, maintaining public trust means AI captions must meet broadcast-level accuracy and still require human validation."

9.5. Interpretation and outlook

The results indicate a transitional phase:

- AI is emerging as a promising enabler of accessibility, offering cost efficiency, automation, and innovation;
- However, quality, linguistic diversity, and trust remain limiting factors for full deployment.

Providers that target the Luxembourg public express particular interest in AI subtitling and speech recognition, but require technical partnerships (e.g. with universities, research centres, or national language institutes) to make AI tools suitable for multilingual environments.

Future priorities include:

- Developing certified AI models for Luxembourgish and regional languages;
- Ensuring hybrid systems combining automation with human validation;
- Facilitating shared testing environments for smaller providers to access AI resources.

10. Accessibility of User Interfaces

10.1. Compliance with European Accessibility Standards

Out of 59 audiovisual service providers, only 12 (20.3%) indicated that their user interfaces — such as websites, mobile applications, or electronic program guides (EPG) — currently comply with European accessibility standards (Directive (EU) 2019/882, EN 301 549, or WCAG).

Meanwhile:

- 5 providers (8.5%) acknowledged that their interfaces do not comply;
- 15 providers (25.4%) reported that their systems are in the process of being adapted;

  and the largest share, 27 providers (45.8%), considered the question not applicable — typically because their services are linear TV-only and have no direct digital interface under their control.

This shows a split reality: while a small group of major or institutional actors (e.g. RTL, Chamber of Deputies, Proximus) have already integrated accessibility principles into their platforms, nearly half of all respondents operate without direct digital control (e.g. via third-party distributors such as Sky or Canal+).

10.2. Accessibility Features in User Interfaces

When asked to specify which accessibility features were available, only a **minority of services** reported concrete implementations.

Feature	Share of Respondents	Number of Providers
High contrast text option	**16.9 %**	10
Customisable text display banner	**6.8 %**	4
Full-screen magnifier	**13.6 %**	8
Voice view / screen reader support	**6.8 %**	4
Hearing aid device support (Bluetooth, etc.)	**10.2 %**	6
Closed captions & audio description settings	**11.9 %**	7
Not applicable	**67.8 %**	40

The results confirm that advanced accessibility tools (screen readers, voice control, magnifiers) remain limited in deployment, while basic features such as contrast settings and caption menus are slowly being integrated.

This aligns with a trend seen in previous cycles: interface accessibility is progressing slowly and unevenly, often depending on the size of the provider and the technical control they hold over their distribution systems.

10.3. User Testing with Persons with Disabilities

Only 8.6% of respondents (5 providers) reported that their interfaces are regularly tested with persons with disabilities.

Nearly one-third (29.3%) stated they do not conduct such testing, while 62.1% considered it not applicable — again reflecting the dominance of service providers who outsource technical interfaces to external platforms.

This low testing rate indicates that user-centered accessibility validation remains rare, and many providers lack internal capacity or awareness to engage persons with disabilities in their design or testing processes.

10.4. Key technical challenges identified

A thematic analysis of the responses highlights several recurring barriers to implementing accessible user interfaces. First, many smaller or local broadcasters face resource constraints: limited budgets, small teams, and a lack of technical expertise reduce their capacity to plan and deploy accessibility features. For example, some organisations cannot afford dedicated accessibility staff or additional development time.

Technological fragmentation is another key barrier. Providers must ensure that accessibility functions work across a wide range of devices, platforms, and distribution modes (satellite, IPTV, OTT), including older television sets and set-top boxes that often lack the processing power needed to support advanced features. At the same time, Luxembourg's trilingual environment increases design complexity, as interfaces must handle multiple languages and sometimes easy-to-read versions, while tools such as automatic captioning remain less performant in Luxembourgish.

Further obstacles arise from dependence on external platforms and the cost of tailored development. When interfaces are operated by third-party distributors, broadcasters have limited control over menus, electronic program guides, and accessibility settings. In addition, custom accessibility functions often require bespoke software that is not included in standard solutions and can be prohibitively expensive, especially for small providers.

11. General analysis, conclusion and outlook

Our analysis highlights that language plays a decisive role in accessibility. English-language media providers encounter far fewer obstacles in subtitling due to, among other things, the availability of advanced tools and established workflows, whereas Luxembourgish-language providers face technical and financial constraints that limit their ability to implement equivalent accessibility features.

We observe a clear divide within the market: larger networks and institutional actors are actively aligning with European standards, conducting WCAG audits, and implementing accessibility options across web and mobile platforms; smaller or content-only providers, by contrast, often lack both the technical control and the resources to modernise or adapt their interfaces. Furthermore, the multilingual and multi-platform nature of Luxembourg's audiovisual sector amplifies these challenges, making a one-size-fits-all approach impractical.

Luxembourg faces a unique linguistic and media landscape in Europe. With three official languages—Luxembourgish, French, and German—the country must balance accessibility requirements across multiple languages, while most audiovisual services under its jurisdiction do not primarily target the Luxembourgish public. Many channels are established in Luxembourg for mainly technical reasons, such as uplinks or satellite capacity, serving international audiences in languages unrelated to Luxembourg.

This combination of linguistic diversity and heterogeneous service origins creates a distinctive regulatory challenge: applying stricter accessibility obligations uniformly could be disproportionate and legally complex. In this context, Luxembourg adopts a pragmatic and constructive approach, promoting accessibility through guidelines, stakeholder dialogue, and targeted measures for public service broadcasters, thereby advancing inclusion while respecting EU law and the country-of-origin principle.

In theory, stricter national obligations with enforcement mechanisms and sanctions may appear to be an effective way to promote accessibility, and this approach offers three main advantages:

a) Direct effectiveness: it compels all providers to comply with accessibility standards, ensuring measurable results.

b) Clarity and predictability: binding rules with sanctions allow for uniform application and facilitate monitoring and control.

c) Accelerated compliance: it encourages operators to invest in accessibility, reducing the time needed to achieve the set objectives.

However, Luxembourg's specific situation limits the feasibility of this approach:

a) Heterogeneity of services under Luxembourg jurisdiction: only a minority of channels actually target the Luxembourgish public. Many services broadcast to foreign markets, often in languages irrelevant to Luxembourg.

b) Disproportion and low relevance: imposing strict obligations on international services that do not serve the Luxembourgish audience would be legally vulnerable and disproportionate compared to the legitimate objective of protecting persons with disabilities in Luxembourg.

c) Constraints under EU law: any stricter national rule must apply uniformly to all providers under Luxembourg jurisdiction (country-of-origin principle). Selective or differentiated application according to the audience or language would breach EU law.

Consequently, Luxembourg favors a pragmatic and gradual approach:

a) Raising awareness among providers: engaging in dialogue to encourage the adoption of accessibility best practices.

b) Sharing good practices and guidelines: providing best practices and facilitating engagement with organisations representing persons with disabilities.

c) Targeted reinforcement for public service: imposing stricter standards on public service missions, where the justification is fully legitimate and proportionate.

This approach allows Luxembourg to promote accessibility while respecting EU law and its unique national context, preparing the ground for sustainable progress that is accepted by the audiovisual sector.