

RNIB, RNID, EFHOH, EUD, FEPEDA AND EBU
SUBMISSION IN RESPONSE TO THE EC PUBLIC CONSULTATION ON
THE REVIEW OF TELEVISION WITHOUT FRONTIERS DIRECTIVE

INTRODUCTION

Access to television is a fundamental right. In the words of Commissioner Viviane Reding *“Information, democratic dialogue and cultural and social values. These words reveal the important role of broadcasting in our societies. It is not simply an industry like any other.”*¹

It is vital that television is accessible to as wide an audience as possible. For blind and partially sighted people this means providing audio description and audio subtitling. For deaf and hard of hearing people, this means providing subtitles, specifically designed for them, and also sign language, on television to allow spoken words and sounds to be visually displayed on the screen (see below for descriptions of these services).

THE AUDIENCE FOR SUBTITLING, SIGN LANGUAGE, AUDIO DESCRIPTION AND AUDIO SUBTITLING.

1. People with hearing and sight loss

7.4 million Europeans have an intractable sight loss while 6.5 million have a severe or profound hearing loss. Furthermore, many millions of European citizens have a significant hearing loss and correctable sight loss. Professor Adrian Davis, from the Institute of Hearing Research (IHR) in the UK, estimates that 81,536,000 adults will have a hearing loss in Europe as a whole by 2005. By 2015 the figure will be 90,588,000². This means that more than one in seven adults in Europe will have hearing problems.

With regard to children, the IHR estimates that there are 174,000 children in Europe, as a whole, with severe hearing loss and a further 600,000 with mild hearing loss³.

Subtitles are particularly vital for deaf children and more subtitling of children's television programmes is necessary. Independent Television Commission research in the UK found that:

*“...there is a need for more children's television programmes to be subtitled... To enable young people who are deaf to interact with their hearing peers, they require access to the same information and at the same time- television is critical to this provision.”*⁴

¹ Speech by Viviane Reding to the European Voice conference on Television Without Frontiers (Brussels, 21/03/02).

² The 81.536 million figure is for people aged 18 and over with bilateral hearing impairment at 25 dB Hearing Level and above (the figure of severe and profoundly deaf is 6.5 million) both in EU member states and other European countries (as defined by UN/WHO).

³ The total child population (0-19 years old) who have permanent childhood hearing impairment (defined as ranging from 40 db HL to 95+ db HL) in European countries both in and outside the EU is 174,000. A further 600,000 have mild hearing impairment (defined as bilateral impairment at 25+ db HL).

⁴ Susan Gregory and Jane Sancho-Aldridge (1998) Dial 888: Subtitling for deaf children (ITC Research Paper).

It is also important to provide sign language on children's television for deaf children who are too young to read subtitles.

Furthermore, there is an increasing ageing population in Europe, most of whom will experience hearing problems in later life. Today, there are more than 70 million people aged 60 and above in the EU, representing just under 1 in 5 of the population. According to Eurostat⁵, over the next fifteen years, the population aged 65 and over will increase by 22%. Over this period the number of people aged 80 and over will rise by almost 50%. In the UK alone, 55.5% of people aged over 60 have hearing problems and 93% of those aged over 80 have hearing loss.

Sight loss is also very common amongst older people. Figures from the UK show that one in twelve people aged over 60 are blind or partially sighted rising to one in six people over 75.⁶

Subtitles, sign language, audio description and audio subtitling make television accessible for this large group of people with hearing or sight loss.

Subtitling:

Subtitles for deaf and hard of hearing people are a printed transcription of the dialogue and sound effects of a programme or film shown at the bottom of the screen. Subtitles produced for hearing audiences (i.e. translations of foreign language films) often do not include a transcription of sound effects but this is vital (particularly those sounds which are off screen) for deaf and hard of hearing people.

Sign language:

This is a language that uses a system of manual, facial, and other body movements as the means of communication, especially among deaf and hard of hearing people. In the context of TV broadcasting, sign language interpretation refers to the translation of spoken dialogue into sign language while sign language presentation refers to the direct presentation of a programme in sign language.

For many deaf people, sign language is their first language. Increasing sign language interpretation and also, importantly, presentation (i.e. presenters of programmes using sign language, as opposed to interpretation in the corner of the screen) on television is vital in the promotion of cultural and linguistic diversity in Europe. Distinct deaf cultures have developed in European countries through the use of sign languages which should be protected and promoted⁷.

⁵ "The social situation in the European Union 2001 (Eurostat)".

⁶ Ian Bruce, Aubrey McKennell and Errol Walker (1991) "Blind and partially sighted adults in Britain: the RNIB survey" Volume 1 London: HMSO

⁷ The UK Government has recently recognised British Sign Language as an official language. According to a recent Council of Europe report "The recognition of sign languages by the Council of Europe's member states as a natural and complete means of communication for deaf people will promote the integration of these persons into society and will facilitate their access to education, employment and justice" (Protection of sign languages in the member states of the Council of Europe (Doc 9738, March 2003).

Audio description:

This is an additional narration that fits between the existing dialogue and that describes action, body language and facial expression. Audio describing TV programmes, films, plays etc is technically relatively easy especially with digital technology.

The service is not widely available, but where available is highly appreciated. It is seen as a key to making television accessible for blind and partially sighted people. According to a testimony from 2 audio description users:

*"Me and Barbara used to work together and we-d hear colleagues talking about what was on TV the night before. We used to find it really difficult to join in conversations because we missed so much of the programme. I wish we'd had audio description back then, it makes such a difference, it makes you feel part of it."*⁸

A 23-year old blind girl illustrates the frustration of not being able to watch TV like everybody else when she says:

*"I just want to watch the same programmes as everyone else... I can't just turn on the TV and relax, I have to work really hard to keep up with a programme."*⁹

Audio subtitling:

This is a voice output for subtitles. This is only appropriate for programmes in foreign languages and is no substitute for audio description of own-language programmes. It is used in e.g. the Netherlands and some Scandinavian countries.

2. The wider public

It is important to remember that many hearing people will also benefit from increased subtitling. By increasing the amount of subtitling on television, broadcasters are providing an improved service for the vast majority of their viewers. As well as deaf and hard of hearing people, people learning a second language, people with learning difficulties and children starting to read also benefit from subtitling¹⁰.

Subtitles also enable better comprehension of TV programmes for hearing people who have learning difficulties or who are watching a programme in a second language in which they are not fluent, because they are able to read, as well as listen to, what is being said. Hearing people also find subtitles

⁸ Vale, Dan and Marriott, Julienne (2002), "Get the picture: making television accessible to blind and partially sighted people", RNIB, Case study 4.

⁹ Ibid, Case study 1.

¹⁰ See Deborah Lineberger, University of Kansas (2001) "Learning to Read from Television: The Effects of Using Captions and Narration", in: Journal of Educational Psychology 2001, Vol.93. No. 2, pg 288-298 and Andrea Shettle, Gallaudet University (August 1996), "Closed Captions: An Untapped Resource in Combating Illiteracy" taken from www.robson.org/gary/captioning/shettle.html

convenient in their daily lives, for example, when there is high background noise in their domestic environment.

Subtitling can also be a useful aid in teaching hearing children to read and spell. For example, recent research from the US found that “...*beginning readers can learn to recognize words in print by viewing captions on television.*”¹¹ Research carried out by the International Association for the Evaluation of Educational Achievement (IEA) associated high reading performance among nine year olds with “moderately heavy” television viewing in Finland, Sweden and Norway, where television has a high rate of subtitled foreign programmes¹².

Similarly, audio description provides assistance to people without a sight problem. Elderly viewers' comprehension and memory for a reasonably fast-moving TV programme is aided by audio description, without any negative effects¹³. This is also applicable to viewers who have a sub-optimal understanding of a programme due to cultural effects, language difficulties, cognitive impairment or due to joining the programme after the scene has been set.

Viewers engaged in another activity that involves their attention are only released to concentrate on that activity if they have the reassurance that they are not going to miss a crucial visual element of the programme. This can be achieved with audio description.

Audio description enables the delivery of television programmes on platforms that would not normally be associated with television. This has already been demonstrated on audio cassette releases of popular television programmes. They contain additional narratives that set the scene and compensate for purely visual elements of the programme."

Accessible information on interactive television is important to those who may be house bound. Many states are moving towards placing important information in electronic form where digital TV could be used in conjunction with a return channel.

By increasing assistive services for disabled people on television European broadcasters will be also providing an improved service for **all** viewers.

ISSUES THAT NEED TO BE ADDRESSED AT EU LEVEL

Audio Description, accessible on-screen menu's and accessible interfaces

¹¹ Deborah Lineberger, University of Kansas (2001) “*Learning to Read from Television: The Effects of Using Captions and Narration*”, in: Journal of Educational Psychology 2001, Vol.93. No. 2, pg 297.

¹² Pirjo Linnakylä, “*Subtitles Prompt Finnish Children to Read*”, in: Reading Today (IRA bimonthly October/November 1993, pg 31).

¹³ The Independent Television Commission (1993), The AUDETEL Project: Final Report, Volume II - Optimisation of an audio description service for visually handicapped and elderly people; Human and Technical Factors, part 2.

We need to ensure the capability for receiving audio description will be built into all digital receivers (set-top boxes and Integrated Digital TV sets) that are sold in Europe.

We need targets, at an acceptable level, so that a higher percentage of programmes are audio described, with a suitable percentage to meet the needs of blind and partially sighted people for each country (in the UK, representatives of blind and partially sighted people are aiming at 50%).

We need to ensure that on-screen text such as on-screen programme guides and menus can be accessed by blind and partially sighted people, in a way that meets their needs (e.g. with screen reader, with voice input/output). Otherwise blind and partially sighted people are not able to find their way or "navigate" around digital television. Changing channels, controlling volume, finding out programme information are impossible if they are dependent on being able to read and select options from relatively small written information on the television screen. Yet technology has existed for years which enables text manipulation on screen or voice output - it's how blind and partially sighted people use computers at work and at school.

We need accessible interfaces (such as remote controls) that follow design for all principles and that have an audio output that can be used by blind and partially sighted people.

At EU level the following measures can be taken to remedy this situation:

- standardisation¹⁴ of technical requirements for the transmission and delivery of audio description. These standards should be mandatory;
- requiring national governments to provide information of the levels of audio description, audio subtitling, subtitling and sign language available to TV viewers;
- requiring national governments to assess and improve the situation with concrete measures and in consultation with stakeholders by way of national action plans submitted to the European Commission (see below);
- requiring the European Commission to produce annual benchmarking reports on the basis of this information to raise awareness of best practice across Europe;
- making research funding available to research technical solutions to access problems (e.g. user interfaces, interactive services). Research could be done with people without sight problems to establish the wider potential and therefore the wider market for accessible products. Research could explore other uses for the audio description channel when it is not being used for description e.g. its use for additional programme information;
- making funding available to train more describers to deliver good quality audio description.

Subtitling and Sign Language

¹⁴ On the basis of the recommendations of the report to CENELEC on "TV for all": standardisation requirements for access to digital TV and interactive services by disabled people, that will be produced by the end of 2003.

We need an improvement in the presently low levels of subtitling and sign language in Europe on public and commercial channels¹⁵ and require the EU Commission to take steps to highlight best practice examples such as those in the UK. Improvement in levels of sign language interpretation and presentation on television across Europe is also necessary.

The cost of subtitling is consistently falling across the EU. In the UK, for example, it averages out at £400 per hour or approximately 655 euros. The Dutch subtitling campaign SOAP! point out that the cost of subtitling in Holland constitutes less than 1% of programme budgets¹⁶. Funding is needed to enable research and development of better subtitling technology and also to improve quality and quantity of subtitling produced. There is also shortage of subtitlers and sign language interpreters in many countries, which needs to be addressed. EU funding for training of subtitlers and signers is essential to support and provide more jobs in this growing industry.

There is not sufficient circulation and re-use of subtitling files between countries with a common language. An example of a subtitling exchange system is Switzerland. Schweizerische Teletext exchange of subtitle files with Germany and Austria. Last year they took close to 411 hours of films from Germany and Austria. In the French and Italian speaking part of Switzerland there is also an exchange of files with some French TV-stations (34 hours) and in Italy with RAI (17 hours).

Circulation and re-use of subtitling files would further reduce the cost of subtitling and it is suggested that organisations such as the European Broadcasting Union could be called on to encourage their members to address this.

The CENELEC TV for All report recommendations¹⁷ must be mandated by the European Commission and compulsory technical standards drawn up covering:

- transmission and decoding equipment which ensures universal provision of subtitling, sign language and interactive services¹⁸
- receiver terminals, peripherals and interactive equipment with improved ease of use, labelling and user friendly displays, adequate connections and interconnections, capacity and interoperability to ensure all assistive services are received, backward compatibility and future proofing through software downloads and where practicable a common interface (CI) slot,

¹⁵ A subtitling questionnaire was sent out to EFHOH member organisations both inside and outside the EU this year. Respondents to the survey highlighted the absence of legislation and the resulting low levels of subtitling and sign language on many European public television stations, and the complete absence of services for deaf and hard of hearing consumers even on major commercial television channels. Many respondents also highlighted the low quality of the subtitling services that are provided.

¹⁶ This is down from £900-£700 a few years ago.

¹⁷ The TV for All initiative was launched in response to the eEurope 2005 Action Plan aiming to accelerate the Information Society and two important EC Directives: The Framework Directive 2002/21/EC and the Universal Service Directive 2002/22/EC. The mandate to the European Standards Bodies for Standardisation in the field of information and communications technologies (ICT) for disabled and elderly people (M/273) states:

"The provision of technology-based solutions for integrating disabled and elderly people and helping them to lead full and independent lives requires two complementary approaches; the "design for all" approach and the "assistive technology" (AT) approach."

¹⁸ this requirement mandatory in the US for analogue and now for digital as well

use of voice output, more clarity and logical positioning of control functions. Furthermore, deaf and hard of hearing consumers should be made aware that equipment on sale is accessible to them through a consumer labelling scheme

- remote controls with better layout and functionality including one touch access to subtitling and signing services and standard subtitling and signing symbols
- intuitive on-screen menus and EPGs (Electronic Programme Guides) with better visibility, simplicity of use and other forms of listings, with easy identification, ease of access to relevant services and use of voice output¹⁹
- recording equipment that can record subtitling and sign language services and comprehensive subtitling on videos and DVDs (including subtitling of extra DVD features)
- best practice guidelines in service presentation techniques for both audio and visual means

What can be done at EU level to remedy this situation?

- research on levels of subtitling and sign language on television in member states and benchmarking awareness raising of best practice e.g. the UK
- draw up mandatory technical standards for the provision of subtitling and sign language on the basis of the recommendations arising out of the CENELEC TV for All report
- funding for further research into new technology such as voice recognition and virtual signing leading to the development of higher quality subtitling and signing at a lower cost and a clear sound channel to reduce background noise
- project funding for measures to spread technology of subtitling production and training of subtitlers and sign language interpreters
- measures to encourage the circulation and re-use of subtitling files

HOW THESE ISSUES CAN BEST BE RAISED DURING THE REVIEW OF TELEVISION WITHOUT FRONTIERS

EU wide action is necessary to facilitate an increase in the amount of audio subtitling and sign language. The review of Television Without Frontiers (TVWF)²⁰, the “Cornerstone of the European broadcasting policy”²¹, provides an ideal opportunity to do this during the European Year of Disabled People this year.

¹⁹ A recent report from 2002 in the UK entitled “Easy TV” by the Independent Television Commission and Consumers Association found that users found the complexity of using digital TV as comparable with using a personal computer.

²⁰ Directive 89/552/EEC

²¹ Patrice Aubry (2000) “The ‘Television Without Frontiers’ Directive, Cornerstone of the European Broadcasting Policy” (European Audiovisual Observatory).

While there are no references to accessibility of broadcasts for disabled people in the current Directive but RNIB, RNID, EFHOH, EUD, FEPEDA and EBU believe that the issue is relevant to the TVWF Directive.

Under Article 3a of the Directive, Member States may take measures to *“ensure wide access by the public to television coverage of events of major importance for society.”*

Increasing subtitling and sign language provision, in particular, is also vital in the promotion of cultural and linguistic diversity in Europe. Distinct Deaf cultures have developed in European countries through the use of sign languages which should be protected and promoted through the increased provision of sign language on television.

Furthermore, increasing audio description, subtitles and signing on television also ensures that people with sensory impairments have access to their cultural and linguistic heritage in the same way that other citizens do.

These issues should be covered in the following sections of the European Commissions fourth report on the application of the TVWF directive²²:

- section 1.2. “Development of the television market in Europe” should recognise that disabled people are part of the audience and what problems they face in terms of accessibility of broadcasts. It should also emphasise that the switchover to digital television can lead to the exclusion of disabled people unless the problems of accessibility they face are addressed properly
- section 3.7 “co-ordination between national authorities and the Commission”: should emphasise the role national action plans and benchmarking can play to improve the accessibility problems disabled people face; it should put the requirement on National Regulatory Authorities and broadcasters to promote subtitling.
- Work Programme- section 3: “Issues not covered by the Directive” should include a section on accessibility for disabled people and the full list of actions to be taken at European Commission and Member State level to address their right to accessible digital television.

THE ROLE OF NATIONAL ACTION PLANS

We call on the European Commission to ensure that member states report back on a regular basis on measures they are taking to improve access to television for people with sensory impairments.

Real action can be encouraged by instating an annual European Commission benchmarking report on making digital TV accessible for people with disabilities. This report would be based on national action plans from member states on the measures they are taking to meet this target. These national

²² COM (2002) 778 final

action plans have to be submitted to the European Commission and have to cover:

- what the levels of subtitling, signing, audio description and audio subtitling are in each country
- how broadcasters and decision makers have consulted with representatives of disabled users on increased levels and what the resulting target % for audio describing, audio subtitling, signing and subtitled broadcasts programmes are
- publication of quotas achieved by broadcasters towards their set targets
- what measures the country is taking to reach these targets, including obligations put on broadcast service providers, manufacturers of television sets
- what measures the country is taken to ensure enforcement, in other words making sure that service providers and manufacturers of TV sets meet the target set in the country's national action plan, and what measures a country has in place to deal with those not meeting the targets set in their country's national action plan

In the UK the Communications Bill²³ introduces subtitling requirements on new digital terrestrial TV, increasing them from 50% to at least 80%. This requirement will also apply to digital cable and satellite TV in due course. The target for audio description that is suggested is 10%, although representatives of blind and partially sighted people are asking for it to be increased to 50%. Further details of the Communications Bill can be found at: <http://www.communicationsbill.gov.uk>

The British Broadcasting Corporation (BBC) is committed to 100% subtitling of its terrestrial and leading digital channels by 2009. The Independent Television Commission has recently committed to increasing subtitling on the two leading independent commercial terrestrial television stations: ITV 1 is required to subtitle 90% of its programme hours by 2010 and Channel 5 must reach 80% by 2008. The other major independent broadcaster, Channel 4 has agreed to match ITV 1 subtitling targets. With regards to sign language interpretation, by 2008, 5% of programme hours will be signed on digital terrestrial television in the UK. All these targets will be achieved by mandatory stages each year.

RNID, RNIB, EFHOH, EUD, FEPEDA and EBU believe that all European countries should introduce high subtitling, audio description and sign language targets for both public and commercial broadcasters. National Action Plans will enable benchmarking between countries, the will ensure progress is measured and best practice is shared between countries.

For further information, please contact:

²³ introduced into the House of Commons on 19 November 2002, expected to be passed by mid-July 2003

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ANNEX 1: European Parliament Question by Philip Whitehead MEP and reply from Commissioner Reding

Subject: Access to television for people with sensory impairments

At present EU audiovisual policy does not address the issue of access to television for people with sensory impairments. Most EU Member States have very low levels of subtitling and sign language interpretation for deaf and hard of hearing people and audio description for the visually impaired. Yet more than 1 in 7 have significant hearing loss and 7.4 million people are blind or partially sighted in Europe. These people face social exclusion if they are not given the chance to access broadcast services like everybody else. It is crucial that this problem is addressed now, as digital television will not only be used for broadcasts in the future but also for interactive services such as the internet.

Does the Commission intend to address the lack of access to television for deaf and hard of hearing and blind and visually impaired people through the current review of the Television Without Frontiers Directive and related initiatives, in the run up to European Year of People with Disabilities in 2003?

E-1402/02EN

Answer given by Mrs Reding
on behalf of the Commission
(28 June 2002)

The issues raised by the Honourable Member do not fall within the fields coordinated by the Television Without Frontiers Directive , which establishes the legal framework ensuring the freedom to provide television broadcasting in the Community.

Assuming broadcasters do offer such services in line with Member States' policies, their transmission over electronic communications networks is addressed by the new regulatory framework for electronic communications services and networks. In particular, the Honourable Member should refer to Article 31 of Directive 2002/22/EC of the Parliament and of the Council on universal service and users' rights relating to the electronic communications networks and services (Universal Service Directive) . The Universal Service Directive explicitly refers to the possibility for Member States to impose certain must-carry rules on undertaking providing electronic communications networks for the transmission of services specifically designed to enable appropriate access by disabled users.

The Commission intervenes in this field by supporting various initiatives. In this respect, the Commission Joint Research Centre is promoting, throughout the "Voice Project" (<http://voice.jrc.it>), the development and harmonisation of subtitling in European television broadcasting.

The eEurope 2002 Action Plan, adopted at the European Council of Feira in June 2000, includes the specific objective of ensuring that people with

disabilities benefit fully from new technologies and the Internet and the specific target of adoption of the Web Accessibility Guidelines for public websites in Member States and European Institutions. Accordingly, the Commission adopted on September 2001 the Communication: "eEurope 2002: Accessibility of Public Web Sites and their Content". On March 25th the Telecommunications Council adopted a Council Resolution on the subject.

More recently, the Commission supported a joint European Committee for Standardisation (CEN), European Committee for Electrotechnical Standardisation (CENELEC), European Telecommunications Standards (ETSI) workshop "TV Broadcasting for all" which was held successfully in Seville on 13-14 June 2002. The objective of the seminar was to discuss all issues of subtitling and audio description that could be addressed by standardisation. A report summarises these issues and propose a way forward.

In its Communication "Towards a barrier free Europe for people with disabilities", the Commission stressed the aspect of "harnessing the information society for the benefit of all ". Disability is one of the ten priorities of the eEurope Initiative, fostering on innovation and improvement in accessibility for all communication products and services for disabled people.

In order to further develop awareness, and without prejudice to the application of the subsidiarity principle, the Commission intends to raise this issue in the report on the application of the Television Without Frontiers Directive, which is to be submitted to the Parliament and the Council by the end of 2002.

ANNEX 2: ABOUT RNIB, RNID, EFHOH, EUD, FEPEDA AND EBU

RNIB (Royal National Institute for the Blind) campaign for a world where people who are blind or partially sighted enjoy the same rights, responsibilities, opportunities and quality of life as people who are sighted. Promoting social inclusion and challenging discrimination is one of the key areas we focus on. We empower people who are blind and partially sighted in the UK, help remove the barriers they face and help to prevent blindness.

RNID (Royal National Institute for Deaf people) is the UK's largest charity representing the needs of its 300, 000 members and supporters and the broader community of 9 million deaf and hard of hearing people in the UK. RNID's vision is to ensure that deafness and hearing loss are not barriers to opportunity and fulfilment. We do this by raising awareness of deafness and hearing loss, by providing services, through social, medical and technological research and development and by campaigning for better legislation and practice.

EFHOH (The European Federation of the Hard of Hearing) is a European NGO covering countries inside and outside the European Union. Twenty-six national organisations, representing 200,000 members, are affiliated to the EFHOH. It works for increased accessibility for hard of hearing people in all

parts of society and aims to influence national and international laws in order to achieve this.

The European Union of the Deaf (EUD) is a European non-profit making organisation whose membership comprises National Associations of Deaf people in each of the EU member states. Established in 1985, EUD is the only organisation representing the interests of Deaf Europeans at European Union level. EUD aims to establish and maintain EU level dialogue with the "hearing world" in consultation and co-operation with its member National Deaf Associations.

EUD's mission statement is to promote, advance and protect the rights of and opportunities for Deaf people in the European Union. Emancipation and equal opportunities are key philosophies in our work towards achieving an equal position in society with recognition of Deaf people as full citizens in our own right. This vision translates into three specific EUD aims:

- Recognition of the right to use an indigenous sign language;
- Empowerment through communication and information;
- Equality in education and employment

FEPEDA (The European Federation of Parents of Hearing Impaired Children) is a non-governmental umbrella organisation set up to represent associations of parents and friends of deaf and hard of hearing children at a European level. Its membership includes national and regional associations as well as smaller groups and individuals from all of the European Union, Central and Oriental Europe and the Community of Independent States.

The European Blind Union (EBU) is a non-governmental and non profit-making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it is the only organisation representing the interests of blind and partially-sighted people in Europe.

EBU aims to protect and promote the interests of blind and partially sighted people in Europe. EBU currently has 44 member countries, each represented by a national delegation.