[DE] State media authorities publish new guidelines on accessibility in streaming services and on smart TVs

IRIS 2026-10:1/32

Christina Meese
Institute of European Media Law

On 2 October 2026, the state media authorities (*Landesmedienanstalten*) published two explanatory documents designed to provide greater clarity and improve the future accessibility of streaming services and smart TVs. One set of guidelines is aimed at services that provide access to audiovisual media services, offering them practical guidance on fulfilling their legal obligations in a concise and clear format. The guidance for users, meanwhile, provides clear information about existing requirements, as well as where and how complaints can be lodged in the event of a lack of accessibility.

The guide entitled "Accessibility for Providers of Access Services to Audiovisual Media Services" was drawn up by the state media authorities primarily because discussions with stakeholders had revealed that smaller providers, in particular, are either unaware of their legal obligations or do not fully understand them. These obligations, which are set out in Sections 99a to 99e of the Interstate Media Treaty (*Medienstaatsvertrag* – MStV), are therefore explained in a clear and concise manner. Accordingly, the guide is also aimed at those legally subject to these obligations, – primarily, providers of smart TV portals, electronic programme guides, streaming services and media libraries. Essentially, these providers should design their services in such a way that people with various disabilities can find them, gain access to them and use all their essential functionality. In doing so, the guide addresses, amongst other things, technical standards based on the Web Content Accessibility Guidelines (WCAG) 2.2 (Conformity Level AA) and the European harmonised technical standard EN 301 549, whilst observing the four fundamental principles of perceivability, operability, understandability and robustness. Furthermore:

- all essential functionality should be usable without a mouse (i.e. using a keyboard);

- services should be compatible with common assistive technologies such as screen readers, magnification software, voice control or alternative input devices;

- content and functions should be easily perceivable and accessible through sufficient contrast, varied colour schemes, clearly legible displays, understandable labelling and text alternatives for graphics and images; and, finally,

© European Audiovisual Observatory (Council of Europe) 2026

- consistent terminology should be used for identical functions.

Ideally, providers should also provide search and filter functions that allow users to specifically search for and filter by categories such as "subtitles", "audio descriptions", "sign language versions" and "content in plain language". The guide also provides guidance on providers' associated obligations, such as the accessibility statements they must provide for their services, documentation requirements and the complaints procedures available to users.

The latter, in turn, form the central focus of the guidance for users entitled "On the accessibility of streaming services, smart TV portals and similar platforms" (*Barrierefreiheit für Zugangsdiensteanbieter zu audiovisuellen Mediendiensten*), which the state media authorities published on the same day. This guidance essentially covers the same legal obligations as the guidelines for services, but it is written from the user's perspective. In particular, the right to lodge a complaint in person or with the assistance of an association or a qualified body in accordance with Section 99d(3) of the MStV is explained in an accessible manner, and the relevant reporting bodies are listed.

Leitfaden Barrierefreiheit für Zugangsdiensteanbieter zu audiovisuellen Mediendiensten

https://www.die-medienanstalten.de//fileadmin/user_upload/die_medienanstalten/Service/Merkblaetter_Leitfaeden/Leitfaden_Barrierefreiheit_f%C3%BCr_Zugangsdiensteanbieter_zu_audiovisuellen_Mediendiensten.pdf

Accessibility guidelines for providers of access services to audiovisual media services

Hinweise für Nutzende Zur Barrierefreiheit von Streamingdiensten, Smart-TV-Portalen & Co.

https://www.die-medienanstalten.de//fileadmin/user_upload/die_medienanstalten/Service/Merkblaetter_Leitfaeden/Hinweise_f%C3%BCr_Nutzende_zur_Barrierefreiheit_von_Streamingdiensten_Smart-TV-Portalen__Co.pdf

Information for users on the accessibility of streaming services, smart TV portals and similar platforms

© European Audiovisual Observatory (Council of Europe) 2026

© European Audiovisual Observatory (Council of Europe) 2026