



4.13. GR - Greece¹⁸⁹

4.13.1. Key findings

- Greece does not make a distinction between audiovisual media service providers; the statute governs linear and non-linear providers.
- Providers must make services continuously and progressively more accessible.
- No specific disabilities are mentioned – the law is aimed to benefit “persons with disabilities” – however, means used are subtitling, sign language interpretation, audio description and spoken subtitles. Further emergency information is provided in “easy-to-understand” language.
- The minister to whom responsibilities of the General Secretariat of Communication and Information are assigned and who is intended to define the means, procedures and technical or detailed issues relating to accessibility has not yet published a decision, meaning that rules about submitting action plans or reports have not yet been issued.
- At present, linear media service providers have the following obligations:¹⁹⁰
 - Private broadcasters: a newscast of at least seven minutes duration provided with sign language and subtitles offered after 17:00 and four hours per week of other subtitled programming between 17:00 and 23:00.
 - Public broadcasters: a newscast of at least 14 minutes duration provided with sign language and subtitles offered after 17:00 and 12 hours per week of other subtitled programming between 17:00 and 23:00.
 - (VOD) providers must provide 20% subtitled programmes in their catalogue.
- A dispute over copyright has lead voice-over actors to refuse to record audio description files for all broadcasters.¹⁹¹
- Spoken subtitles have not been implemented due to technical difficulties reported by all broadcasters.¹⁹²
- Many advertisements have subtitling.¹⁹³
- Private broadcasters and on-demand platforms are presently obliged to pay a levy of 0.3% of their gross income to the Centre for Education and Rehabilitation of the Blind (NPDD) and the Panhellenic Association of the Blind (NPID) in order to fund these civil society organisations in creating national infrastructure to meet the

¹⁸⁹ The summary on Greece incorporates the feedback received from Persa Lambropoulou, legal advisor at the National Council for Radio and Television, during the checking round with the national regulatory authorities.

¹⁹⁰ This is likely to change with the new Ministerial Decision, which has yet to be issued.

¹⁹¹ <https://www.esr.gr/%CE%B1%CE%BC%CE%B5%CE%B1/>

¹⁹² Ibid.

¹⁹³ Ibid.



informational and educational needs of blind students, in lieu of access to television services.¹⁹⁴

- There is an ongoing complaint from a civil society group representing visually impaired persons, Magnites Tyfloi, regarding the failure to include audio translation of foreign speakers' words in news reports.¹⁹⁵

4.13.2. Legal framework: primary and secondary legislation

National legislation	Summary of the measures
Article 7 (1) AVMSD	
Law 4779 of 20 February 2021 "Accessibility of people with disabilities in audiovisual media services" – Article 10 paragraph 1 ("NOMOS YΠ' APIΘM. 4779") ¹⁹⁶	Media service providers must make their services continuously and progressively more accessible. Suggested means are subtitling, sign language interpretation, audio description and spoken subtitles.
Article 7 (2) AVMSD	
Law 4779 of 20 February 2021 – Article 10 paragraph 2	Media service providers must report to the national media regulatory authority, the National Council of Radio and Television (ESR) (<i>Ethniko Symvoulío Radioteleorasis</i>) and the Directorate for Media Surveillance of the Secretariat–General for Communication and Information (the Directorate) within the first two months of each year. The Directorate will report to the Commission every three years.
Article 7 (3) AVMSD	
Law 4779 of 20 February 2021 – Article 10 paragraph 3	Media service providers must develop action plans to make services progressively more accessible and submit them to the ESR and the Directorate.
Article 7 (4) AVMSD	
Law 4779 of 20 February 2021 – Article 10 paragraph 4	The ESR, in cooperation with any other competent authority or body, will provide information about the accessibility of media service providers' programming and allow them to submit complaints on a dedicated website.
Article 7 (5) AVMSD	

¹⁹⁴ Article 7(2) of Law 1866/1989

¹⁹⁵ <https://nevronas.gr/to-somateio-magnites-tyfloi-zita-orthes-praktikes-enimerosis-ton-mme-gia-ta-atoma-me-anapiria-orasis/>

¹⁹⁶ https://www.et.gr/api/DownloadFeksApi/?fek_pdf=20210100027



Law 4779 of 20 February 2021 – Article 10 paragraph 5 Article 51 paragraph 2	Media service providers must provide emergency information, including public communication and announcements in natural disasters in an accessible and easy-to-understand manner. The technical and detailed issue of implementation will be determined by the ESR.
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4.13.3. Overview of national rules

Types of accessibility measures	Brief overview of existing rules
Accessibility measures (hearing impairments)	Private broadcasters: a newscast of at least seven minutes duration provided with sign language and subtitles offered after 17:00 and four hours per week of other subtitled programming between 17:00 and 23:00. Public broadcasters: a newscast of at least 14 minutes duration provided with sign language and subtitles offered after 17:00 and 12 hours per week of other subtitled programming between 17:00 and 23:00. VOD providers must provide 20% subtitled programmes in their catalogue.
Accessibility measures (visual impairments)	No specific obligations or quotas – see 1.1.1 regarding levy payments to civil society groups.
Accessibility measures developed by self- or co-regulatory process	Yes, media service providers are obliged to create action plans and submit them to the regulatory authorities.
Reporting to the NRA – frequency	Yes, media service providers are obliged to report annually to the national regulatory authority ESR and the Directorate.
Designated point of contact for information and complaint	Yes, a website to be maintained by the ESR will provide information and a complaints mechanism.

4.13.4. Law in practice: selected examples¹⁹⁷

All media service providers report that audio description measures have not been implemented due to a dispute over intellectual property rights; and spoken subtitles have not been implemented because of reported technical difficulties. A number of advertisements displayed on these channels have been made accessible with subtitles. Since 1989 the levy to support civil society groups representing blind users in creating national infrastructure to provide access to information and

¹⁹⁷ Examples as provided by the national expert.



education has been used in place of accessibility obligations for television providers relating to providing access for persons who are blind or visually impaired.

4.13.4.1. Public service broadcasters

Public service broadcasters ERT1, ERT2, ERT3, ERTNEWS and Parliament TV use subtitles and sign language interpretation, including for a designated religious service. They have not submitted a plan to the ESR yet, as the ministerial decision governing submission of these plans has yet to be issued.

4.13.4.2. Private broadcasters

Private broadcasters Alpha, Ant1, Makedonia, Mega, Open Star and Skai use subtitles and sign language interpretation to make their programming accessible. They have not submitted a plan to the ESR yet, as the ministerial decision governing submission of these plans has yet to be issued.

4.13.4.3. VOD

VOD providers Cosmote TV, EON-Nova and Vodafone (private) and ERTFLIX (public) use subtitling and sign language interpretation. They have not submitted a plan to the ESR yet, as the ministerial decision governing submission of these plans has yet to be issued