CARDAN

WCAG 2.1 audit level AA
Internationaal Eurovignet Boekingsportaal

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Introduction

On behalf of Belastingdienst the extent to which the website Internationaal Eurovignet Boekingsportaal conforms to the Web Content Accessibility Guidelines (WCAG) 2.1 has been evaluated. This audit is based on the European standard for accessibility requirements, EN 301 549.

Web Content Accessibility Guidelines (WCAG) 2.1 defines how to make web content more accessible to people with and without disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities. The guidelines aim to make web content more usable by older individuals with changing abilities due to aging and to improve usability for users in general.

At the top of the WCAG 2.1 are four principles that provide the foundation for web accessibility: Perceivable, Operable, Understandable and Robust. The accompanying guidelines provide the basic goals that authors should work toward in order to make content more accessible to users with different disabilities. For each guideline, testable success criteria are provided to allow WCAG 2.1 to be used where requirements and conformance testing are necessary. In order to meet the needs of different groups and different situations, three levels of conformance are defined for the success criteria: A (lowest), AA, and AAA (highest). For each of the guidelines and success criteria in the WCAG 2.1 document itself, the working group has also documented a wide variety of techniques. The techniques are informative and fall into two categories: those that are sufficient for meeting the success criteria and those that are advisory.

Evaluating the extent to which a website conforms to the Web Content Accessibility Guidelines (WCAG) 2.1 is a process involving several steps. The activities carried out within these steps are influenced by many aspects such as: the type of website (e.g. static, dynamic, responsive, mobile, etc.); its size, complexity, and the technologies used to create the website (e.g. HTML, WAI-ARIA, PDF, etc.); how much knowledge the evaluators have about the process used to design and develop the website; and the main purpose for the evaluation (e.g. to issue an accessibility statement, to plan a redesign process, to perform research, etc.).

This report only provides examples of problems found; however, this is not a complete overview. The audit is indicative of the different types of problems found. It is therefore possible that one type of problem occurs in more than one place, but only a few examples have been mentioned.
Because the audit consists of a sample, a problem may not be identified. Naturally, we try to sample in such a way that this is minimized, but it can never be ruled out. It can then be noticed during a subsequent audit.

When improvements are made, keep in mind that they may create new accessibility issues.

Questions?

This report presents all the evaluation findings of the audit of the selected sample of web pages. If you have any questions about the report or the findings, please contact us by e-mail: technobility@cardan.com.

Evaluation

Evaluation data

Client:	Belastingdienst
Evaluated website:	Internationaal Eurovignet Boekingsportaal
Evaluation type:	WCAG 2.1 inspection level AA
Report version:	1.0
Report date:	12 October 2023
Inspection organization:	Cardan Technobility
Evaluator:	Lucie Barlin
Senior Consultant:	Bart Pluijms

Evaluation scope

- All pages on oipt.eurovignette.eu/portal (URI base)
- Not the pages on ages.de (different URI base and style features)
- Not third-party content (legal exception for the government)

The reason for including or excluding a part is shown above between the parentheses. This conforms to the rules for identifying the scope according to the evaluation methodology WCAG-EM.

Evaluation sample

9 pages (See appendix 1 for the complete sample)

Evaluation methodology

The WCAG Evaluation Methodology has been used as a guide during the evaluation of the website. See: https://www.w3.org/WAI/test-evaluate/conformance/wcag-em/.

Applied norm

WCAG 2.1 (www.w3.org/TR/WCAG2.1).

Used techniques

During the evaluation it is assumed that all W3C techniques are supported and can be used. See: www.w3.org/TR/WCAG20-TECHS and www.w3.org/WAI/WCAG2.1/Techniques

Accessibility support baseline

Common web browsers and assistive technologies.

User Agents

During the evaluation the following user agents were used:

- Google Chrome, version 116 (primary)
- Mozilla Firefox, version 116

- Microsoft Edge, version 115
- PDF Accessibility Checker (PAC)
- NVDA in combination with Google Chrome

Web technologies relied upon

- HTML
- CSS
- WAI-ARIA
- JavaScript
- DOM
- PDF

Inspection body

This inspection was carried out by Cardan Technobility.

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Summary

The audit into the accessibility of website Internationaal Eurovignet Boekingsportaal was completed on 12 October 2023. The standard used is WCAG 2.1 level AA.

Not all success criteria are currently met. Improvements can be made using the findings and advice from our report.

Result WCAG 2.1: Does not comply

Currently, 35 of the 50 success criteria for WCAG 2.1, levels A and AA.

Feedback from auditor

In some respects, the web pages examined are already easily accessible.
On the website, certain style features, such as increased line spacing, can be applied without loss of content. This is important for people with dyslexia who use their own style sheet to make the text easier to read, for example. And the language of the pages is well marked. This allows reading software to read out the page correctly.
So in this respect, accessibility is already well taken into account.
However, accessibility problems have also been found. For instance, there are problems with alternative texts. These are required for blind people. Alternative texts can be used to read out what is in the image. On the contrary, if an image is decorative, no alternative text is needed. Auxiliary software can then ignore the image. Not all content can be operated with the keyboard. This is important for people who use the keyboard, e.g. blind people or those with motor disabilities. And in some places, self-built elements are used for buttons and the like, instead of standard html elements. With these elements, the name or role cannot always be determined. This is necessary for blind people. Auxiliary software can then convey this information.

Evaluation results

An overview of all WCAG 2.1 success criteria of level A and AA, divided over the 4 principles Perceivable, Operable, Understandable and Robust, can be found below. A short description, the level and the result is given for each success criterion. An overview of all the evaluation findings for each success criterion that fails can be found in the next chapter.

Perceivable

Criterium	Description	Level	Result
1.1.1	Non-text Content	A	Failed
1.2.1	Audio-only and Video-only (Prerecorded)	A	Passed
1.2.2	Captions (Prerecorded)	A	Passed
1.2.3	Audio Description or Media Alternative (Prerecorded)	A	Passed
1.2.4	Captions (Live)	AA	Passed
1.2.5	Audio Description (Prerecorded)	AA	Passed
1.3.1	Info and Relationships	A	Failed
1.3.2	Meaningful Sequence	A	Passed
1.3.3	Sensory Characteristics	A	Passed
1.3.4	Orientation	AA	Passed
1.3.5	Identify input purpose	AA	Failed
1.4.1	Use of Color	A	Passed
1.4.2	Audio Control	A	Passed
1.4.3	Contrast (minimum)	AA	Failed
1.4.4	Resize text	AA	Passed
1.4.5	Images of Text	AA	Passed
1.4.10	Reflow	AA	Failed
1.4.11	Non-text contrast	AA	Failed
1.4.12	Text spacing	AA	Passed
1.4.13	Content on hover or focus	AA	Passed

Operable

Criterium	Description	Level	Result
2.1.1	Keyboard	A	Failed
2.1.2	No Keyboard Trap	A	Passed
2.1.4	Character key shortcuts	A	Passed
2.2.1	Timing Adjustable	A	Passed
2.2.2	Pause, Stop, Hide	A	Passed
2.3.1	Three Flashes or Below Threshold	A	Passed
2.4.1	Bypass Blocks	A	Passed
2.4.2	Page Titled	A	Passed
2.4.3	Focus Order	A	Failed
2.4.4	Link Purpose (In Context)	A	Failed
2.4.5	Multiple Ways	AA	Passed
2.4.6	Headings and Labels	AA	Failed
2.4.7	Focus Visible	AA	Failed
2.5.1	Pointer gestures	A	Passed
2.5.2	Pointer cancellation	A	Passed
2.5.3	Label in name	A	Failed
2.5.4	Motion actuation	A	Passed

Understandable

Criterium	Description	Level	Result
3.1.1	Language of Page	A	Passed
3.1.2	Language of Parts	AA	Passed
3.2.1	On Focus	A	Passed
3.2.2	On Input	A	Passed
3.2.3	Consistent Navigation	AA	Passed
3.2.4	Consistent Identification	AA	Passed
3.3.1	Error Identification	A	Failed
3.3.2	Labels or Instructions	A	Failed
3.3.3	Error Suggestion	AA	Passed
3.3.4	Error Prevention (Legal, Financial, Data)	AA	Passed

Robust

Criterium	Description	Level	Result
4.1.1	Parsing	A	Passed
4.1.2	Name, role, value	A	Failed
4.1.3	Status messages	AA	Passed

Evaluation scores

	Level A	Level AA	Total
Perceivable	7 / 9	7 / 11	14 / 20
Operable	10 / 14	1 / 3	11 / 17
Understandable	3 / 5	5 / 5	8 / 10
Robust	1 / 2	1 / 1	2 / 3
Total	**21 / 30**	**14 / 20**	**35 / 50**

Principle 1: Perceivable

Information and user interface components must be presentable to users in ways they can perceive.

Guideline 1.1: Text Alternatives

Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.

> **level A**
>
> ### Success criterion 1.1.1: Non-text Content
> All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The aim of this success criterion is to make information conveyed by non-textual content accessible through a text alternative. Auxiliary software makes these alternative texts, for example, audible through pre-reading software or tangible through Braille.

There is a logo link of Eurovignette at the top of the website. The text equivalent of this image link is now "Eurovignette User charge Logo". This does not contain the visual text of the other translations such as "Gebruiksrecht". Text alternatives should contain all important information. This is also a problem under success criterion 2.5.3. https://oipt.eurovignette.eu/portal/en/booking/booking

Within the form there are several question mark icons that show help windows. Here, the text alternative "Open help box" is insufficiently descriptive. It is not clear for which field help will be provided. This can be solved by giving the button the extended text alternative "Help with 'license plate country'", for example. This also applies to the cross icons that appear when help windows are opened, with a text alternative of "Close help box". https://oipt.eurovignette.eu/portal/en/booking/booking

At step 6 in the form, if the user pays with a fuel or fleet card, multiple vignettes can be bought together. If there are two or more vignettes in the cart, a bin icon appears next to the amount with accessibility name "Delete". This text alternative is also insufficiently descriptive. This can be solved by giving the element an extended text alternative, including the registration number or valid period.

At step 6 in the form, if the user pays with a fuel or fleet card, multiple vignettes can be bought together. At the "More Eurovignettes" label, there is a plus icon with text alternative "More". A better descriptive text alternative would be "Add another Eurovignette".

The following PDF document shows the Eurovignette logo on page 1, as well as an AGES logo at

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the bottom. However, these logos do not have alternative text. It is important that the logos have alternative text because the images contain important information about the file. Users of auxillary software cannot now know that the file officially belongs to Eurovignette and AGES, because it does not read out what the logo belongs to. The logos on the pages that follow should be marked as decorative.
https://oipt.eurovignette.eu/download/Nutzerbeschreibung_20230616_EN.pdf

This also applies to the logo in the following PDF document. It now has a text alternative of "logo" that is not properly descriptive. Change this so that all text in the logo is reflected in this description.
https://oipt.eurovignette.eu/download/Tarifliste_2023_20230616_EN.pdf

The following is not wrong, but can be improved:
Page https://oipt.eurovignette.eu/portal/en/booking/booking has a form with different images within the help windows. These now have descriptive text alternatives. But these images are already additional information from the text within them. They can have empty alt attributes, of `alt=""`. Furthermore, the text in the alt attribute "Image of..." is redundant and would be better if it is removed.

Guideline 1.2: Time-based Media

Provide alternatives for time-based media.

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level A

Success criterion 1.2.1: Audio-only and Video-only (Prerecorded)

For prerecorded audio-only and prerecorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labeled as such:

- **Prerecorded Audio-only**: An alternative for time-based media is provided that presents equivalent information for prerecorded audio-only content.
- **Prerecorded Video-only**: Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

---

level A

Success criterion 1.2.2: Captions (Prerecorded)

Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

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level A

Success criterion 1.2.3: Audio Description or Media Alternative (Prerecorded)

An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

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level AA

Success criterion 1.2.4: Captions (Live)

Captions are provided for all live audio content in synchronized media.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

level AA

Success criterion 1.2.5: Audio Description (Prerecorded)
Audio description is provided for all prerecorded video content in synchronized media.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

Guideline 1.3: Adaptable

Create content that can be presented in different ways (for example simpler layout) without losing information or structure.

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level A

Success criterion 1.3.1: Info and Relationships

Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The purpose of this success criterion is to make information about and relationships between content clear to all users. Among other things, this means that visual information should also be represented in the same or equivalent way in the code.

In the main menu bar of the website, there is a drop-down menu for a language change. The purpose of this menu has not been conveyed to assistive software users, as the accessibility name "label" of the menu is insufficiently descriptive. This also becomes a problem under success criterion 2.5.3.
https://oipt.eurovignette.eu/portal/en/booking/booking

The website contains a number of texts in bold. Here, the strong-element has been used incorrectly. The advice is to format these elements with CSS, as a strong-element is meant to give emphasis to part of a text being read out by auxillary software. For example, see on page https://oipt.eurovignette.eu/portal/en/impressum the text "AGES ETS GmbH", and on page https://oipt.eurovignette.eu/portal/en/tariffs/tariffs the table headings of "Emission group", "1-3 axles", and "4 or more axles".

Page https://oipt.eurovignette.eu/portal/en/booking/booking contains a form. Within the form are several question mark icons showing help windows. Here, the question mark icons are not linked to the fields and the particular purposes of the icons are not conveyed to help users. Resolving success criterion 1.1.1 also resolves this. This also applies to the plus icon with tesktalternative "More" at step 6, next to the label "More Eurovignettes".

At steps 2-8 in the form, there are visual headers that are not formatted as headers (h-element). For example, "Please choose a validity period", "Choose the card type", and "Fill in card details". "Choose card type" at step 4 should be formatted with an h2 element, and then the current h2 element "Accepted payment methods" should be formatted with an h3 element, otherwise the first h2 element becomes a header with no content.

On page https://oipt.eurovignette.eu/portal/en/information/information, under the "Documents" header, there is a visual list of links to PDF documents. These links are formatted with a table. These are not table data. A table is not meant to format a list, this can create incorrect

relationships. Also, this is read aloud to people who use reading software. Use an ul element here.

The following is not wrong, but can be improved:
The following PDF documents contain a number of empty P tags, which are used to create extra space. This in itself is not wrong, but can be a nuisance for users of auxiliary software, because each time it is mentioned that there is an empty paragraph. https://oipt.eurovignette.eu/download/Nutzerbeschreibung_20230616_EN.pdf
https://oipt.eurovignette.eu/download/Tarifliste_2023_20230616_EN.pdf

level A

Success criterion 1.3.2: Meaningful Sequence
When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level A

Success criterion 1.3.3: Sensory Characteristics
Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 1.3.4: Orientation
Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 1.3.5: Identify input purpose

The purpose of each input field collecting information about the user can be programmatically determined when:

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

In the form on page https://oipt.eurovignette.eu/portal/en/booking/booking the use of the autocomplete
attribute is required. Assistive software needs to be able to assist in filling fields like "Card holder" and "CVV2". See page https://www.w3.org/TR/WCAG21/#input-purposes for a full list.

Guideline 1.4: Distinguishable

Make it easier for users to see and hear content including separating foreground from background.

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level A

Success criterion 1.4.1: Use of Color

Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

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level A

Success criterion 1.4.2: Audio Control

If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

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level AA

Success criterion 1.4.3: Contrast (minimum)

The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:
- **Large Text**: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;
- **Incidental**: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
- **Logotypes**: Text that is part of a logo or brand name has no minimum contrast requirement.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

Visually impaired or colour-blind users may have difficulty reading text if the contrast with the background is too low. Normal text should have a minimum contrast of 4.5:1 and texts larger than

24px/18pt (or 19px/14pt for bold text) should have a minimum contrast of 3.0:1.

There is a form on page https://oipt.eurovignette.eu/portal/en/booking/booking. If the user enters an invalid registration number (e.g. 1-ABC-23), a notification appears at step 2. Under the heading "!" are different translations of the notification. The Turkish translation includes a link with text "Yardım". This has too low a contrast with the background of 3.2:1.

level AA

Success criterion 1.4.4: Resize text

Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 1.4.5: Images of Text

If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following:

- **Customizable**: The image of text can be visually customized to the user's requirements;
- **Essential**: A particular presentation of text is essential to the information being conveyed.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 1.4.10: Reflow

Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for:

- Vertical scrolling content at a width equivalent to 320 CSS pixels;
- Horizontal scrolling content at a height equivalent to 256 CSS pixels; Except for parts of the content which require two-dimensional layout for usage or meaning.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

If the website is viewed at a resolution of 320 by 256 pixels or a resolution of 1280 by 1024 pixels and 400% zoom, no content should be lost and no horizontal scrolling should be required to read content. This is important for visually impaired people who view the image zoomed in. This is

because it costs them extra effort if they have to scroll back and forth with each line.

If the user is inactive on the website for a few minutes, a message "Your session has expired" appears. The rescaled version of the website must be scrolled horizontally to read this. The intention is to require vertical scrolling only.
https://oipt.eurovignette.eu/portal/en/booking/booking

On the rescaled version, a hamburger menu is displayed. When it is opened, a cross icon appears to close the menu. On page https://oipt.eurovignette.eu/portal/en/booking/booking, it is almost not visible because of the white background of the "Booking" link. This is a loss of information. It also becomes a problem under success criterion 1.4.11.

> **level AA**
> ## Success criterion 1.4.11: Non-text contrast
> The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s):
> - **User Interface Components:** Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author;
> - **Graphical Objects:** Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

Non-textual components need sufficient contrast. This is particularly important for visually impaired users, in order to be able to properly distinguish and use the different components on a web page. Here, the contrast difference should be at least 3.0:1.

The rescaled version of the website shows a hamburger menu. When it is opened, a cross icon appears to close the menu. On page https://oipt.eurovignette.eu/portal/en/booking/booking, it has a contrast with the background of less than 1.1:1 because of the white background of the "Booking" link.

Success criterion 1.4.12: Text spacing

In content implemented using markup languages that support the following text style properties, no loss of content or functionality occurs by setting all of the following and by changing no other style property:

- Line height (line spacing) to at least 1.5 times the font size;
- Spacing following paragraphs to at least 2 times the font size;
- Letter spacing (tracking) to at least 0.12 times the font size;
- Word spacing to at least 0.16 times the font size.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Success criterion 1.4.13: Content on hover or focus

Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true:

- **Dismissable**: A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content;
- **Hoverable**: If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing;
- **Persistent**: The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

Principle 2: Operable

User interface components and navigation must be operable.

Guideline 2.1: Keyboard Accessible

Make all functionality available from a keyboard.

`level A`

Success criterion 2.1.1: Keyboard

All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.
Note 1: This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input but the underlying function (text input) does not.
Note 2: This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

Many assistive technology users use the keyboard to navigate the website, for example due to a motor or visual impairment. For these visitors, it is important that all website functionality can also be operated using the keyboard. Many assistive devices also function like a keyboard.

The main menu bar contains a fold-out language change menu. Since it is an ordinary div element, this is not keyboard operable. The `role="button"` does not add functionality. Preferably use a button element here. Other solutions are also possible.
https://oipt.eurovignette.eu/portal/en/booking/booking

`level A`

Success criterion 2.1.2: No Keyboard Trap

If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

> **level A**
>
> ## Success criterion 2.1.4: Character key shortcuts
>
> If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true:
>
> - **Turn off**: A mechanism is available to turn the shortcut off;
> - **Remap**: A mechanism is available to remap the shortcut to use one or more non-printable keyboard characters (e.g. Ctrl, Alt, etc);
> - **Active only on focus**: The keyboard shortcut for a user interface component is only active when that component has focus.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

Guideline 2.2: Enough Time

Provide users enough time to read and use content.

`level A`

Success criterion 2.2.1: Timing Adjustable

For each time limit that is set by the content, at least one of the following is true: turn off, adjust, extend, real-time exception, essential exception, or 20 hour exception.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

`level A`

Success criterion 2.2.2: Pause, Stop, Hide

For moving, blinking, scrolling, or auto-updating information, all of the following are true:

- **Moving, blinking, scrolling**: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and
- **Auto-updating**: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

Guideline 2.3: Seizures

Do not design content in a way that is known to cause seizures.

<div style="border-left: green">

level A

Success criterion 2.3.1: Three Flashes or Below Threshold

Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.

</div>

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Guideline 2.4: Navigable

Provide ways to help users navigate, find content, and determine where they are.

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level A

Success criterion 2.4.1: Bypass Blocks

A mechanism is available to bypass blocks of content that are repeated on multiple Web pages.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

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level A

Success criterion 2.4.2: Page Titled

Web pages have titles that describe topic or purpose.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Evaluation Findings

This success criterion is designed to identify which page the user is on. The page title, among other things, is displayed in the browser's title bar and can be retrieved by auxiliary software. It is important that the page title describes the subject or purpose and is unique.

The following is not wrong, but can be improved:
A web page title may contain the name of the website in addition to a description of the content or purpose. This is a best practice that is not mandatory, but can be very useful. On a number of pages within the sample, this was done. And if the name of the website itself is also in the title, it is best to put it at the end of the title. https://oipt.eurovignette.eu/portal/en/booking/booking

It is better to use the separator (|) to separate the subject from the organisation name in the page title. This is because the hyphen (-) is often read as a "minus sign" by screen readers.

---

level A

Success criterion 2.4.3: Focus Order

If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The purpose of this success criterion is to ensure that users can use the information in a logical order. This is the sequential order (step by step) in which the tab focus shifts when the user navigates with the keyboard. This sequence should match the meaning of the content. This allows users to form a mental image of the content.

On page https://oipt.eurovignette.eu/portal/en/booking/booking, there is a form. Next to each field is a question mark icon to expand a help window. When this window is unfolded using the keyboard, the focus shifts from the question mark to the cross icon (close button) within the window. This is not logical, because the focus should go to the beginning of the new content that is presented. This is important so that a screeenreader can read the help text from the beginning. Now, this help text is skipped and the focus is moved to the close button. If someone wants to read the help text that person much read backwards because in the HTML order the help text comes before the button. So, after activating the help button make sure the focus goes to the beginning of the help text. After reading the help text the focus can then go to the close button. Also, if this help message is closed it is important that the focus returns to the help button that opened the help text. That is not the case now. The focus goed to the next interactive component. That is not logical. If a person opens the help text, reads it and then closes it, the person should be able to continue from the point where it was before opening the help text. So, the focus should return to the help button.

> **level A**
>
> ## Success criterion 2.4.4: Link Purpose (In Context)
> The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

Users with disabilities need the purpose of each link to be clear. For example, they can navigate through a web page by following links or use auxiliary software to retrieve a list of all links on a page.

There is a logo link of AGES in the footer of the website. It has a text alternative of "Logo of system provider AGES". A text alternative like this appears to refer to AGES' home page, but it refers to the "Legal notice" page of the website. As a result, this logo does not have a clear link purpose. https://oipt.eurovignette.eu/portal/en/booking/booking

level AA

Success criterion 2.4.5: Multiple Ways

More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 2.4.6: Headings and Labels

Headings and labels describe topic or purpose.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

Among other things, this success criterion helps people who use screen readers by ensuring that headings have meaning when read without context. It is also necessary for people with cognitive disabilities.

On page https://oipt.eurovignette.eu/portal/en/booking/booking, there is a form. If the user enters an invalid registration number, a message appears at step 3. The second block of content has a header of "!". This is not a descriptive header. Although this header is hidden for screenreaders, it is still visible for people who can see. This succescriterion is also for people who can see, who can use headers to easily scan the contents of a webpage. So, the solution here is to either give this block of content a descriptive header (for instance: "translations", or "In other languages", or hide it for alle people (and not just blind people). Or, maybe hide the whole block of contents, since the visitor already chose one particular language there is nog real need for the error message in different languages.

level AA

Success criterion 2.4.7: Focus Visible

Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

It is important that the focus indicator is always visible on all interactive parts on a web page, such as links and buttons. This is necessary for people using the keyboard who can see, for example people with motor disabilities. They need to be able to see where the focus is on the

page.

If the user is inactive on the website for a few minutes, a notification of, for example, "Your session is about to expire. Time remaining: 01:25". The focus indicator on the button labeled "Close" is not visible.
https://oipt.eurovignette.eu/portal/en/booking/booking

On page https://oipt.eurovignette.eu/portal/en/booking/booking at step 6, there is an element with text "Cancel". When the user presses this, a lightbox appears with two buttons, "Delete" and "Go back". The focus indicator on these buttons is not visible.

At step 6 in the form, if the user pays with a fuel or fleet card, multiple vignettes can be bought together. If there are two or more vignettes in the cart, a bin icon appears next to the amount with accessibility name "Clear". When pressed, a lightbox appears with two buttons, "Delete" and "Cancel". The focus indicator on these buttons is not visible.

Guideline 2.5: Input modalities

Make it easier for users to operate functionality through various inputs beyond keyboard.

> **level A**
>
> ### Success criterion 2.5.1: Pointer gestures
> All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

> **level A**
>
> ### Success criterion 2.5.2: Pointer cancellation
> For functionality that can be operated using a single pointer, at least one of the following is true:
> - **No Down-Event**: The down-event of the pointer is not used to execute any part of the function;
> - **Abort or Undo**: Completion of the function is on the up-event, and a mechanism is available to abort the function before completion or to undo the function after completion;
> - **Up Reversal**: The up-event reverses any outcome of the preceding down-event;
> - **Essential**: Completing the function on the down-event is essential.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

> **level A**
>
> ### Success criterion 2.5.3: Label in name
> For user interface components with labels that include text or images of text, the name contains the text that is presented visually.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

This success criterion is intended to enable voice control. What is important here is that the visually visible text is part of the element's accessibility name. People using voice control software can then speak the visible text to control an element.

In the main menu bar of the website, there is a logo link of Eurovignette. The accessibility name of this image link is now "Eurovignette Right of Use Logo". So this does not include the visual text of the other translations such as "Gebruiksrecht". Accessibility names must contain all visible text. https://oipt.eurovignette.eu/portal/en/booking/booking

In the main menu bar of the website, there is a drop-down menu for a language change. This menu has an accessibility name of "label" that overrides the visible text. Make sure the accessibility name contains at least the visible text of the element.

<div>

level A

Success criterion 2.5.4: Motion actuation

Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when:

- **Supported Interface**: The motion is used to operate functionality through an accessibility supported interface;
- **Essential**: The motion is essential for the function and doing so would invalidate the activity.

</div>

Result

✔ Pass: none of the techniques of this success criterion are applicable.

Principle 3: Understandable

Informatie en de bediening van de gebruikersinterface moeten begrijpelijk zijn.

Guideline 3.1: Readable

Make text content readable and understandable.

level A

Success criterion 3.1.1: Language of Page
The default human language of each Web page can be programmatically determined.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 3.1.2: Language of Parts
The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Guideline 3.2: Predictable

Make Web pages appear and operate in predictable ways.

level A

Success criterion 3.2.1: On Focus

When any component receives focus, it does not initiate a change of context.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level A

Success criterion 3.2.2: On Input

Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 3.2.3: Consistent Navigation

Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

level AA

Success criterion 3.2.4: Consistent Identification

Components that have the same functionality within a set of Web pages are identified consistently.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Guideline 3.3: Input Assistance

Help users avoid and correct mistakes.

<div>

Success criterion 3.3.1: Error Identification

If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text.

</div>

Result

❌   Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The purpose of this success criterion is to let users know that an error has occurred, and exactly which error it is. The error message should be as specific as possible.

There is a form on page https://oipt.eurovignette.eu/portal/en/booking/booking. At step 1, if this form is sent with invalid values at the "Valid from" and "Valid until" fields, a message appears at the top of the form. "Please enter a valid date format (dd/mm/yyyy)" is an instruction and not an error message, as it does not indicate which error has been made. The error message for the "Registration number" field is correct though, of "The registration number you entered is invalid".

At step 5 in the form, when the "Card number" field is left blank and sent, a message appears on the screen, of "Please enter a value for the 'Card Number' field". This is an instruction and not an error message.

At step 6 in the form, if the checkbox "I accept the General Terms and Conditions of Trade" is left blank and sent, a message appears on screen, of "Please accept our General Terms and Conditions". This is an instruction and not an error message.

<div>

Success criterion 3.3.2: Labels or Instructions

Labels or instructions are provided when content requires user input.

</div>

Result

❌   Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The purpose of this success criterion is that before, during and after filling in an input field, there is visual information that helps a user determine what to fill in where and to determine whether the correct data has been entered.

Every input needs a clear label of some instructions. This includes the option to set a different

language. These labels or Instructions need to be visible. The select-element with the aria-label name "label" in the main menu bar does not meet this success criterion. https://oipt.eurovignette.eu/portal/en/booking/booking

There is a form on page https://oipt.eurovignette.eu/portal/en/booking/booking. At step 1, if this form is sent with invalid values at the "Valid from" and "Valid until" fields, a message appears at the top of the form of "Please enter a valid date format (dd/mm/yyyy)". If a particular format is required, this must be specified in advance.

---

level AA

Success criterion 3.3.3: Error Suggestion

If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

---

level AA

Success criterion 3.3.4: Error Prevention (Legal, Financial, Data)

For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true:

1. **Reversible**: Submissions are reversible.
2. **Checked**: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.
3. **Confirmed**: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

Principle 4: Robust

Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

Guideline 4.1: Compatible

Maximize compatibility with current and future user agents, including assistive technologies.

level A

Success criterion 4.1.1: Parsing

In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.

Result

✅ Pass: The evaluated sample of web pages passes this success criterion.

WCAG 2.2

Success criterion 4.1.1 has been removed from WCAG 2.2. This success criterion has therefore not been audited. For WCAG 2.1, this success criterion is automatically met.

level A

Success criterion 4.1.2: Name, role, value

For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.

Result

❌ Fail: the evaluated sample of web pages fails this success criterion.

Evaluation Findings

The purpose of this success criterion is that software can determine the correct name, role and value or status of interactive components.

Using improper WAI-ARIA is a common failure. It's not possible for a WAI-ARIA button to have both the attributes aria-pressed and aria-expanded, a single button can't be two different things at once. The button is either a toggle or a button that controls the visibility of a section of page content. As a solution it's advised to remove all aria-pressed attributes on page https://oipt.eurovignette.eu/portal/en/booking/booking, on, for example, the close buttons that appear when a question mark icon is pressed.

In step 4 of the form the labels "Fuel/Fleet card" and "Credit card" have associated radio buttons. The aria-checked status doesn't change when changing the setting. This issue is also present in ("Credit card") step 5. https://oipt.eurovignette.eu/portal/en/booking/booking

level AA

Success criterion 4.1.3: Status messages
In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus.

Result

✅ Pass: none of the techniques of this success criterion are applicable.

Appendix 1: Sample

This research was carried out on the basis of a sample. The way in which the sample is determined is prescribed in the evaluation document WCAG-EM. If a process is included in the evaluaton, all process pages in the sample are also listed.

Full sample

- https://oipt.eurovignette.eu/portal/en/booking/booking
- https://oipt.eurovignette.eu/portal/en/agb
- https://oipt.eurovignette.eu/portal/en/privacy
- https://oipt.eurovignette.eu/portal/en/impressum
- https://oipt.eurovignette.eu/portal/en/tariffs/tariffs
- https://oipt.eurovignette.eu/portal/en/ exceptionreport.masterlayout:testexception
- https://oipt.eurovignette.eu/portal/en/information/information
- https://oipt.eurovignette.eu/download/Nutzerbeschreibung_20230616_EN.pdf
- https://oipt.eurovignette.eu/download/Tarifliste_2023_20230616_EN.pdf