

EXPERT REVIEW REPORT

on compliance with the Annex to the Act on Digital Accessibility

Portal Bank Danych o Lasach - www.bdl.lasy.gov.pl

Version 1.0

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1. Document Details

Document name: Expert review report on compliance with the Annex to the Act on Digital Accessibility - Portal Bank Danych o Lasach

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Scope of the review: Expert review of a selected sample of subpages and functionalities of Portal Bank Danych o Lasach, covering the WCAG 2.1 success criteria specified in the Annex to the Act on Digital Accessibility.

Notes: The interactive map of the BDL Portal was analysed in terms of the scope of application of the provisions of the Act. Pursuant to Article 3(2)(4) of the Act, it was classified as an interactive map not covered by the provisions of the Act.

2. Change History

Version	Date	Description of changes
1.0	12.08.2026	Creation of the document, description of the review, recording of audit results.

3. Legal Basis and Reference Documents

The review was carried out with reference to the requirements arising from the Act of 4 April 2019 on the digital accessibility of websites and mobile applications of public sector bodies.

Under the Act, public sector bodies ensure digital accessibility by meeting the requirements set out in the Annex to the Act. Digital accessibility covers the functionality, compatibility, perceivability, and understandability of a website or mobile application.

The review applied the WCAG 2.1 success criteria arising from the Annex to the Act.

The report presents results using three statuses:

- Met
- Not met
- Not applicable

The Act provides that its provisions do not apply, among other things, to maps and interactive maps, including geoportals. The exception concerns interactive maps and geoportals intended for navigation purposes, for which address details and geographical location should be presented in a digitally accessible way.

4. Nature of the Review

The review was expert in nature and was carried out on a representative sample of subpages and functionalities of Portal Bank Danych o Lasach.

The purpose of the review was to identify types of non-compliance, not to make a full inventory of every occurrence of a given issue across the entire portal. When a representative example of an actual violation of a criterion was found, the criterion was assessed as not met.

The results of automated tools were not treated as independent evidence of non-compliance. Each result was analysed in terms of the element's function, its significance for the user, and its actual impact on accessibility.

5. Overall Assessment

Non-compliances with digital accessibility requirements were found in the reviewed sample.

The most important issues concern:

- the lack of text alternatives for some non-text content;
- the lack of an equivalent alternative for silent instructional videos;
- the lack of a correct semantic structure on some pages;
- incorrect programmatic association of some form labels;
- the lack of programmatic identification of the purpose of the email address field;
- conveying some information by color only;
- insufficient contrast of some text and interface elements;
- the lack of full keyboard operation for some controls;
- the lack of a mechanism for bypassing repeated page blocks;
- the lack of more than one effective way to locate some pages;
- invisible focus on selected elements;
- the inability to cancel the action of one of the controls before releasing the mouse button;
- the lack of a suggestion for correcting an invalid email address;
- the lack of an accessible name for the search button;
- the lack of programmatic signalling of a dynamic error message.

The portal should be assessed as partially compliant with the requirements of the Annex to the Act on Digital Accessibility.

6. Review Description

The review was carried out as an expert analysis using manual tests and supporting tools.

The following were used:

- Windows operating system;
- Google Chrome browser;
- Accessibility Insights for Web;
- NVDA;
- Chrome DevTools;
- Colour Contrast Analyser;
- Chrome DevTools responsive mode;
- manual tests using a keyboard and mouse.

As part of the review, the following were performed, among other things:

- text alternative tests;
- semantic structure analysis;
- form label analysis;
- contrast measurements;
- content enlargement to 200%;
- testing of a 320 CSS px wide view;
- testing of increased text spacing;
- keyboard-only operation testing;
- Tab, Shift+Tab, Enter, Space, Esc, and arrow-key tests;
- focus visibility testing;

- testing of bypassing repeated blocks;
- analysis of page titles and link purposes;
- analysis of available ways to locate pages;
- testing of time limits, motion, and flashing;
- click cancellation testing;
- analysis of accessible names, roles, and states of elements;
- language declaration analysis;
- analysis of form behaviour during data entry;
- analysis of error messages and dynamic messages;
- automated code tests, the results of which were then manually verified.

7. Review Sample

1. **Portal home page**
<https://www.bdl.lasy.gov.pl/portal/>
2. **News list**
<https://www.bdl.lasy.gov.pl/portal/aktualnosci?v=0>
3. **Sample news item**
<https://www.bdl.lasy.gov.pl/portal/aktualnosci/nowe-dane-w-banku-danych-o-lasach>
4. **Forest management data form**
<https://www.bdl.lasy.gov.pl/portal/dane-urzadzeniowe?v=4>
5. **Reports on the state of forests - data download**
<https://www.bdl.lasy.gov.pl/portal/raporty-o-stanie-lasow?v=3>
6. **Forests in Europe - page containing charts and information graphics**
<https://www.bdl.lasy.gov.pl/portal/lasy-w-europie?v=1>
7. **Instructional videos**
<https://www.bdl.lasy.gov.pl/portal/mapa-filmy-instruktażowe>
8. **Accessibility Declaration**
<https://www.bdl.lasy.gov.pl/portal/deklaracja>
9. **"Request" form**
<https://www.bdl.lasy.gov.pl/portal/wniosek?v=4>

The review also included representative common and functional elements, such as the search engine, tiles, forms, selection controls, links, buttons, checkboxes, radio buttons, and the RDLP/forest district unit tree.

8. Assessment Method

For each criterion, it was determined:

- whether it applies to the reviewed sample;
- whether there is content or functionality covered by the requirement;
- whether automated tools indicate a potential issue;
- whether the issue is confirmed by manual analysis;
- whether it constitutes an actual barrier for the user.

Met - no issues related to the given criterion were found in the reviewed sample.

Not met - at least one representative issue violating the criterion was found in the reviewed sample.

Not applicable - the reviewed sample does not contain content, functions, or situations covered by the criterion.

9. Criteria Table

No.	Criterion	Level	Status	Description
1	1.1.1 - Non-text Content	A	Not met	The reviewed sample contains non-text content without appropriate text alternatives, including graphic interface elements, news graphics, and charts and graphics presenting data.
2	1.2.1 - Audio-only and Video-only (Prerecorded)	A	Not met	Silent instructional videos do not have an equivalent text alternative describing the presented actions.
3	1.2.2 - Captions (Prerecorded)	A	Not applicable	No video recordings containing an audio track requiring captions were identified.
4	1.2.3 - Audio Description or Media Alternative (Prerecorded)	A	Not applicable	No synchronised media covered by the criterion were identified.
5	1.2.5 - Audio Description (Prerecorded)	AA	Not applicable	There are no video recordings with audio requiring audio description.
6	1.3.1 - Info and Relationships	A	Not met	The review identified, among other things, the lack of a semantic heading structure and incorrect programmatic association of some form labels.
7	1.3.2 - Meaningful Sequence	A	Met	No content sequence changing its meaning was identified.
8	1.3.3 - Sensory Characteristics	A	Met	No instructions based solely on sensory characteristics were identified.
9	1.3.4 - Orientation	AA	Met	The portal does not restrict content to one screen orientation.
10	1.3.5 - Identify Input Purpose	AA	Not met	The email field in the "Request" form does not have the correct autocomplete="email" attribute.
11	1.4.1 - Use of Color	A	Not met	In statistical graphics, some data cannot be distinguished independently of color.
12	1.4.2 - Audio Control	A	Not applicable	No automatically playing audio longer than 3 seconds was identified.
13	1.4.3 - Contrast (Minimum)	AA	Not met	The light-grey breadcrumb navigation text achieves a contrast ratio of approximately 1.5:1.
14	1.4.4 - Resize Text	AA	Met	At enlargement to 200%, no loss of content or functionality was identified.
15	1.4.5 - Images of Text	AA	Met	No unjustified use of images of text instead of text was identified.
16	1.4.10 - Reflow	AA	Met	At a width of 320 CSS px, there was no loss of content and no need for horizontal scrolling of ordinary content.
17	1.4.11 - Non-text Contrast	AA	Not met	The arrow of the year-selection list achieves a contrast ratio of approximately 2.9:1.
18	1.4.12 - Text Spacing	AA	Met	Increasing spacing does not cause loss of content or functionality.
19	1.4.13 - Content on Hover or Focus	AA	Not applicable	No additional content requiring assessment under the criterion was identified.
20	2.1.1 - Keyboard	A	Not met	Some controls, including "Select statement" and "Select year", are not available in standard keyboard navigation.
21	2.1.2 - No Keyboard Trap	A	Met	No focus trap was identified.
22	2.1.4 - Character Key Shortcuts	A	Not applicable	There are no shortcuts activated by a single character.
23	2.2.1 - Timing Adjustable	A	Not applicable	No time limits were identified.
24	2.2.2 - Pause, Stop, Hide	A	Not applicable	No automatically moving or updating content covered by the criterion was identified.
25	2.3.1 - Three Flashes or Below Threshold	A	Not applicable	No rapid flashing or flashes were identified.
26	2.4.1 - Bypass Blocks	A	Not met	There is no mechanism that allows users to bypass repeated blocks and move to the main content.
27	2.4.2 - Page Titled	A	Met	The reviewed pages have descriptive document titles.

No.	Criterion	Level	Status	Description
28	2.4.3 - Focus Order	A	Met	The order of reachable elements is generally logical. Issues related to skipped controls were assessed under 2.1.1.
29	2.4.4 - Link Purpose (In Context)	A	Met	The purposes of links can be determined from their text or context.
30	2.4.5 - Multiple Ways	AA	Not met	Some pages and functionalities cannot be effectively found in more than one way.
31	2.4.6 - Headings and Labels	AA	Met	Visible headings and labels describe the topic or purpose of controls.
32	2.4.7 - Focus Visible	AA	Not met	Keyboard focus becomes invisible on some elements.
33	2.5.1 - Pointer Gestures	A	Not applicable	The ordinary pages in the sample do not contain functions requiring multipoint or path-based gestures.
34	2.5.2 - Pointer Cancellation	A	Not met	The "Select year" control expands the list as soon as the mouse button is pressed; moving the pointer away before release does not cancel the action.
35	2.5.3 - Label in Name	A	Met	The checked buttons, links, and controls have accessible names consistent with their visible labels.
36	2.5.4 - Motion Actuation	A	Not applicable	There are no functions activated by device or user motion.
37	3.1.1 - Language of Page	A	Met	The Polish version has lang="pl-PL", and the English version has lang="en".
38	3.1.2 - Language of Parts	AA	Not applicable	No foreign-language fragments requiring a separate language designation were identified.
39	3.2.1 - On Focus	A	Met	Receiving focus alone does not cause a change of context.
40	3.2.2 - On Input	A	Met	Entering or changing data does not cause an unexpected change of context.
41	3.2.3 - Consistent Navigation	AA	Met	Repeated navigation mechanisms occur in the same relative order.
42	3.2.4 - Consistent Identification	AA	Met	Elements performing the same function are identified consistently.
43	3.3.1 - Error Identification	A	Met	An invalid email address is identified with the text message "Invalid email address.".
44	3.3.2 - Labels or Instructions	A	Met	Fields and controls have visible labels or descriptions that make the required action understandable.
45	3.3.3 - Error Suggestion	AA	Not met	The message about an invalid email address identifies the problem but does not provide a suggestion enabling the user to determine the required correction.
46	3.3.4 - Error Prevention (Legal, Financial, Data)	AA	Not applicable	The reviewed sample does not contain operations that create legal or financial obligations or modify or delete user data.
47	4.1.1 - Parsing	A	Met	No separate parsing issues were identified that would justify assessing the criterion as not met.
48	4.1.2 - Name, Role, Value	A	Not met	The search button with the magnifying-glass icon does not have an accessible programmatic name.
49	4.1.3 - Status Messages	AA	Not met	The dynamic message "Invalid email address." is not marked as an alert, status, or aria-live region.