

EXPERT REVIEW REPORT

on compliance with the Annex to the Act on Digital Accessibility

Bank Danych o Lasach mBDL mobile application for iOS

Version 1.0

Date of preparation: 26.08.2026

1. Document Details

Document name: Expert review report on compliance with the Annex to the Act on Digital Accessibility - Bank Danych o Lasach mBDL mobile application for iOS

Audited application: mBDL for iOS

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Scope of the review: Expert review of a representative sample of screens and functionalities of Bank Danych o Lasach mBDL mobile application for iOS, version 2.3.4, tested on an iPhone SE with iOS 26.6, according to the WCAG 2.1 criteria arising from the Annex to the Act on Digital Accessibility.

Notes: The scope of the statutory exemption concerning maps and interactive maps was analysed functionally. Due to the presence of location, route recording, and point-navigation functions, a general exclusion of the entire map functionality from the review was not applied.

2. Change History

Version	Date	Description of changes
1.0	26.08.2026	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, to the extent applicable to native mobile applications.

The report presents results using three statuses:

- Met
- Not met
- Not applicable

When interpreting requirements for native software, the way WCAG criteria apply to technologies other than documents and websites was taken into account, in particular iOS accessibility mechanisms and the behaviour of the application with VoiceOver.

4. Nature of the Review

The review is expert in nature and is conducted on a representative sample of screens, processes, and functionalities of the mBDL application.

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

The results of observations and supporting tools are not treated as independent evidence of non-compliance. Potential issues are manually verified and assessed in terms of their actual impact on use of the application.

The same issue is not automatically assigned to several criteria. If one characteristic of an element violates different requirements for different reasons, each violation is assessed separately.

The scope of the exemption concerning maps and interactive maps was analysed carefully and functionally. It was not assumed that the entire map in the mBDL application is exempt from the accessibility obligation solely because of the application's geoportal character.

5. Overall Assessment

A number of non-compliances with digital accessibility requirements were found in the reviewed sample. The most important issues concern:

- an incomprehensible text alternative for the map-tools button, read by VoiceOver as "spendescription off, button";
- the lack of programmatic exposure of individual tabs and controls in many slide-out views - VoiceOver recognises the back button, title, and all the actual content as one combined element;
- conveying information about map selection by color only;
- insufficient contrast of white text on a light-blue selected-item background in dark mode (approximately 1.6:1);
- loss of content and functionality at the maximum system text size - a truncated title and inability to scroll the full menu list;
- the lack of a mechanism for bypassing a repeated set of elements for a VoiceOver user;
- the lack of alternative ways to reach the main functions;
- incorrect or missing accessibility names for some graphic buttons, including map tools, location, and legend; during the review, the way the map-tools button was read was unstable (previously "spendescription off, button", later only "button").
- the lack of interface operation using an external keyboard and the lack of a visible keyboard focus indicator;

The application 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 iOS accessibility features.

The following were used:

- iPhone SE;
- iOS 26.6 operating system;
- mBDL 2.3.4 application;
- VoiceOver screen reader;
- system text-size settings;
- device orientation change;
- light and dark mode;
- analysis of screenshots and indicative contrast measurements.
- Logitech MX Keys S external Bluetooth keyboard.

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

- tests of text alternatives, accessible names, roles, and states of elements;
- analysis of programmatic relationships and control labels using VoiceOver;
- tests of focus order and navigation using VoiceOver;
- tests of orientation, use of color, contrast, and scaling of text and interface elements;
- tests of external-keyboard operation, including Tab, Shift+Tab, Enter, Space, Esc, and arrow keys;
- tests of focus visibility and the ability to bypass repeated blocks;
- tests of touch gestures, pointer cancellation, and motion actuation;
- testing of input purpose recognition and autofill;
- tests of time limits, moving content, and flashing content;
- tests of the application language and the way content is read by VoiceOver after changing the system language;
- analysis of form behaviour during data entry;
- tests of error identification, error suggestions, error prevention, and status messages.

7. Review Sample

1. Main mBDL application window
2. Main menu
3. BDL Maps - thematic map selection
4. Forest address search
5. Address search
6. Search results and the "Show on map" function
7. WMS maps - list of services and adding and editing a custom service
8. Points and routes
9. Route recording
10. Navigation to a point
11. Distance or area measurement
12. Offline maps
13. shp, kml, gpx files
14. Help

The sample includes navigation and text screens, forms, lists, selection controls, icon buttons, dynamic messages, location functions, and direct interactions with the map. Where necessary, the sample is expanded for a specific criterion.

8. Assessment Method

For each criterion, it was determined:

- whether it applies to the mobile application and the reviewed sample;
- whether there is content or functionality covered by the requirement;
- whether a potential issue can be confirmed in manual testing;
- whether it constitutes an actual barrier for the user.

Met - no issues violating the given criterion were found in the reviewed representative sample.

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

Not applicable - the reviewed sample does not contain content, functions, or situations covered by the criterion, or the requirement does not apply to the reviewed mobile application environment.

9. Criteria Table

No.	Criterion	Level	Status	Description
1	1.1.1 - Non-text Content	A	Not met	The map-tools button is read by VoiceOver as "spendescription off, button", which does not describe its function.
2	1.2.1 - Audio-only and Video-only (Prerecorded)	A	Not applicable	No audio recordings or prerecorded video materials covered by the criterion were identified.
3	1.2.2 - Captions (Prerecorded)	A	Not applicable	No prerecorded video materials containing an audio track requiring captions were identified.
4	1.2.3 - Audio Description or Media Alternative (Prerecorded)	A	Not applicable	No prerecorded synchronised media requiring audio description or an alternative were identified.
5	1.2.5 - Audio Description (Prerecorded)	AA	Not applicable	No prerecorded video materials with audio requiring audio description were identified.
6	1.3.1 - Info and Relationships	A	Not met	In many slide-out views, VoiceOver exposes the back button, title, and all the actual content as one combined element; individual tabs and controls are not available separately.
7	1.3.2 - Meaningful Sequence	A	Met	The order of elements available to VoiceOver is logical and predictable.
8	1.3.3 - Sensory Characteristics	A	Met	No instructions requiring recognition of an element solely by color, shape, size, position, or direction were identified.
9	1.3.4 - Orientation	AA	Met	The application works in portrait and landscape orientation without loss of essential content or functionality.
10	1.3.5 - Identify Input Purpose	AA	Met	In the "Report a comment" function, iOS recognises the email field, displays the appropriate keyboard, and offers autofill.
11	1.4.1 - Use of Color	A	Not met	The currently selected map in "BDL Maps" is distinguished only by a change of background color.
12	1.4.2 - Audio Control	A	Not applicable	No automatically playing audio lasting longer than 3 seconds was identified.
13	1.4.3 - Contrast (Minimum)	AA	Not met	In dark mode, the white text of the selected item on a light-blue background has a contrast ratio of approximately 1.6:1.
14	1.4.4 - Resize Text	AA	Not met	At the maximum text size, the "Search" title is truncated and the main menu does not allow the list to be scrolled to all functions.
15	1.4.5 - Images of Text	AA	Met	No significant textual information presented as graphics instead of interface text was identified.
16	1.4.10 - Reflow	AA	Met	No need to scroll ordinary content both vertically and horizontally at the same time was identified.
17	1.4.11 - Non-text Contrast	AA	Met	No significant interface elements with contrast below the required 3:1 level were identified.
18	1.4.12 - Text Spacing	AA	Not applicable	In the reviewed iOS environment, no system mechanism was identified that would allow spacing between lines, paragraphs, letters, or words to be overridden.
19	1.4.13 - Content on Hover or Focus	AA	Not applicable	No additional content appearing after VoiceOver focus was received was identified.
20	2.1.1 - Keyboard	A	Not met	The external keyboard does not allow navigation to or activation of interface elements; basic actions require touch.
21	2.1.2 - No Keyboard Trap	A	Not applicable	The keyboard does not allow focus to enter interface elements, so there is no situation that can be assessed as a keyboard trap.
22	2.1.4 - Character Key Shortcuts	A	Met	No character-key shortcuts operating outside text fields were identified.
23	2.2.1 - Timing Adjustable	A	Met	No time limits imposed on the user or elements disappearing automatically in a

No.	Criterion	Level	Status	Description
				way that hinders operation were identified.
24	2.2.2 - Pause, Stop, Hide	A	Met	No automatically moving, flashing, scrolling, or updating content requiring controls was identified.
25	2.3.1 - Three Flashes or Below Threshold	A	Met	No flashing or rapidly blinking content was identified.
26	2.4.1 - Bypass Blocks	A	Not met	On the main screen, a VoiceOver user must move through all elements in sequence; no mechanism for bypassing the repeated set of controls was identified.
27	2.4.2 - Page Titled	A	Met	Representative screens have understandable titles read by VoiceOver.
28	2.4.3 - Focus Order	A	Met	VoiceOver focus moves through available elements in a logical and predictable order.
29	2.4.4 - Link Purpose (In Context)	A	Met	The purposes of links, menu items, and navigation elements are understandable from their names or context.
30	2.4.5 - Multiple Ways	AA	Not met	There is essentially one navigation path to the main functions.
31	2.4.6 - Headings and Labels	AA	Not met	The map-tools button has an incomprehensible accessibility label, "spendescription off".
32	2.4.7 - Focus Visible	AA	Not met	When attempting to use an external keyboard, no visible focus indicator appears.
33	2.5.1 - Pointer Gestures	A	Met	Application functions do not require only multipoint gestures or path-based gestures; map operations have alternative controls.
34	2.5.2 - Pointer Cancellation	A	Met	Touch-triggered actions are not performed in a way that prevents withdrawal of the pointer before the interaction is completed.
35	2.5.3 - Label in Name	A	Met	Visible text labels of controls are included in the accessibility names read by VoiceOver.
36	2.5.4 - Motion Actuation	A	Met	No functions requiring mandatory device motion without an available alternative were identified; compass calibration is optional.
37	3.1.1 - Language of Page	A	Met	The primary language of the Polish interface is correctly recognised by VoiceOver and read with the proper pronunciation.
38	3.1.2 - Language of Parts	AA	Not met	After switching the application to English, VoiceOver reads English content using Polish pronunciation, for example "Save my location".
39	3.2.1 - On Focus	A	Met	Moving VoiceOver focus to an interface element alone does not automatically trigger a function or change context.
40	3.2.2 - On Input	A	Met	Entering or changing data does not cause an automatic, unexpected change of context.
41	3.2.3 - Consistent Navigation	AA	Met	Repeated navigation mechanisms are arranged and operated consistently on the reviewed screens.
42	3.2.4 - Consistent Identification	AA	Met	Interface elements performing the same functions are identified consistently across different screens.
43	3.3.1 - Error Identification	A	Met	Data-entry errors are identified and communicated to the user in an understandable way, and the messages are available to VoiceOver.
44	3.3.2 - Labels or Instructions	A	Met	Fields and elements requiring data entry or selection have understandable labels or instructions available to VoiceOver.
45	3.3.3 - Error Suggestion	AA	Met	When an error is detected, the application provides information that makes it possible to correct it, and the messages are available to VoiceOver.
46	3.3.4 - Error Prevention (Legal, Financial, Data)	AA	Met	Operations concerning the user's saved data are protected against accidental, irreversible execution.
47	4.1.1 - Parsing	A	Met	No additional issues with the technical structure of the interface causing incorrect interpretation of elements by VoiceOver were identified.

No.	Criterion	Level	Status	Description
48	4.1.2 - Name, Role, Value	A	Not met	Some graphic buttons do not have an accessible name defining their function; VoiceOver reads, among others, location and map tools only as "button", and the legend also does not have a correct name.
49	4.1.3 - Status Messages	AA	Not met	After saving a location, VoiceOver does not automatically convey confirmation that the operation has been completed.