

EXPERT REVIEW REPORT

on compliance with the Annex to the Act on Digital Accessibility

Bank Danych o Lasach mBDL mobile application for Android

Version 1.0

Date of preparation: 20.08.2026

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 Android

Audited application: mBDL for Android

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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 Android, version 2.3.4, tested on Android 16, 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	20.08.2026	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 Android accessibility mechanisms and the behaviour of the application with TalkBack.

4. Nature of the Review

The review was expert in nature and was carried out on a representative sample of screens, processes, and functionalities of the mBDL application.

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 application. When a representative example of an actual violation of a criterion was found, the criterion was assessed as not met.

The results of supporting tools and observations of the environment were not treated as independent evidence of non-compliance. Each potential issue was manually verified and analysed in terms of its actual impact on use of the application.

The same issue was not automatically assigned to several criteria. If one characteristic of an element violated different requirements for different reasons, each violation was assessed separately under the appropriate criterion.

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:

- the lack of accessible names for some icon buttons and incomplete programmatic exposure of the properties of some controls;
- incorrect programmatic association of some selection controls with their visible labels;
- conveying status information only through a color change;
- insufficient contrast of the text of the selected item;
- loss of some content after increasing the system text size to the maximum;
- the lack of full operation of basic functions using an external keyboard and the occurrence of keyboard traps;
- the lack of a mechanism for bypassing long, repeated sequences of elements for a TalkBack user;
- the lack of alternative ways to reach the application's main functions;
- the lack of unambiguous labels for some map buttons and the lack of visible keyboard focus;
- the lack of programmatic communication of the selected state of selected elements and automatic announcement of some status messages.

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 Android accessibility features.

The following were used:

- POCO X7 Pro device;
- Android 16 operating system;
- mBDL 2.3.4 application;
- TalkBack screen reader;
- Logitech MX Keys S external Bluetooth keyboard;
- system text-size settings;
- system display-size settings: XS / S / L, with S as the baseline setting;
- device orientation change;
- changing the Android system language between Polish and English.

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 TalkBack;
- tests of focus order and navigation using TalkBack;
- 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 TalkBack 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 included navigation and text screens, forms, lists, selection controls, icon buttons, dynamic messages, location functions, and direct interactions with the map. Where necessary, the sample was 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	Some icon buttons on the main screen do not have an accessible text alternative describing their function; TalkBack reads them only as "button".
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 in the reviewed sample.
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 a media 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	On the "Search" screen, some ownership-type selection controls are reported by TalkBack as "unlabelled", despite the visible text being read.
7	1.3.2 - Meaningful Sequence	A	Met	The TalkBack navigation order on the "Search" screen and in the subsequent process is logical; no jumps changing the meaning of content were identified.
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 content or functionality.
10	1.3.5 - Identify Input Purpose	AA	Met	In the "Report a comment" function, Android recognises the email field and offers automatic completion of the user's saved address.
11	1.4.1 - Use of Color	A	Not met	On the "BDL Maps" screen, the currently selected map is distinguished only by a change of background color; a similar mechanism occurs when an item is selected in "Points and routes".
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	On the "BDL Maps" screen, the white text of the selected item on a light-blue background achieves a contrast ratio of approximately 1.6:1.
14	1.4.4 - Resize Text	AA	Not met	At the maximum system text size, some tab labels are shortened with an ellipsis, and longer names on the "BDL Maps" screen are partially truncated.
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	At the maximum display-size setting, no loss of ordinary content or functionality and no need for two-directional scrolling were identified.
17	1.4.11 - Non-text Contrast	AA	Met	No significant interface elements with contrast below 3:1 were identified in the reviewed sample; example arrows of selection controls achieve approximately 3.9:1.
18	1.4.12 - Text Spacing	AA	Not applicable	In the reviewed Android 16 environment, no system mechanism was identified that would allow the user to override spacing between lines, paragraphs, letters, or words.
19	1.4.13 - Content on Hover or Focus	AA	Not applicable	No additional content appearing after receiving focus that would require assessment under the criterion was identified.
20	2.1.1 - Keyboard	A	Not met	The application does not provide full operation of basic functions using an external keyboard. Tab and Shift+Tab do not move focus between interface elements, and performing basic actions requires touch.
21	2.1.2 - No Keyboard Trap	A	Not met	After entering application elements, including the "Forest stand map" list/window, it was not possible to leave the component using the keyboard.
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 way that hinders operation were identified.

No.	Criterion	Level	Status	Description
24	2.2.2 - Pause, Stop, Hide	A	Met	No automatically moving, flashing, scrolling, or updating content requiring a pause, stop, or hide mechanism 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	A TalkBack user must move through a long, repeated sequence of interface elements; no mechanism for bypassing it was identified.
27	2.4.2 - Page Titled	A	Met	The application screens and views had an understandable context allowing the current functional area to be recognised.
28	2.4.3 - Focus Order	A	Met	The TalkBack focus order was logical and predictable; no chaotic jumps were identified.
29	2.4.4 - Link Purpose (In Context)	A	Met	Links, menu items, list items, and navigation actions had understandable names or their purpose was clear from context.
30	2.4.5 - Multiple Ways	AA	Not met	There was one path to the main functions and areas of the application; no alternative mechanisms for reaching important screens were identified.
31	2.4.6 - Headings and Labels	AA	Not met	Most headings and labels were understandable, but some map buttons, including zoom and map-tool buttons, did not have labels describing their purpose for a TalkBack user.
32	2.4.7 - Focus Visible	AA	Not met	No visible and predictable focus was identified when operating the application with an external keyboard.
33	2.5.1 - Pointer Gestures	A	Met	No functions requiring only a complex or multipoint gesture were identified; map functions had simple alternatives.
34	2.5.2 - Pointer Cancellation	A	Met	No issues with pointer cancellation were identified; actions could be cancelled, undone, or confirmed.
35	2.5.3 - Label in Name	A	Met	Elements with visible text labels were read by TalkBack using those labels.
36	2.5.4 - Motion Actuation	A	Met	No functions activated solely by device motion were identified. Compass calibration requires motion but is not mandatory.
37	3.1.1 - Language of Page	A	Met	The application adapts the interface language to the Android system language. After changing the system language from Polish to English, the entire interface changes to English, and after restoring Polish it returns to Polish.
38	3.1.2 - Language of Parts	AA	Not applicable	No content fragments in a language other than the default application language requiring programmatic marking of a language change were identified in the reviewed sample.
39	3.2.1 - On Focus	A	Met	Moving TalkBack focus to an interface element alone does not automatically cause a change of context or trigger a function.
40	3.2.2 - On Input	A	Met	Changing control values does not cause an unexpected change of context. In forms, selecting data updates subsequent fields, and moving to another view occurs after deliberate activation of an element.
41	3.2.3 - Consistent Navigation	AA	Met	Repeated navigation mechanisms occur in a consistent order, retain the same function, and are presented in a predictable way.
42	3.2.4 - Consistent Identification	AA	Met	Interface elements performing the same functions are identified in a consistent and predictable way.
43	3.3.1 - Error Identification	A	Met	The application provides text information about detected issues, and these messages are accessible and read by TalkBack.
44	3.3.2 - Labels or Instructions	A	Met	Fields and controls requiring data entry or selection have visible labels or instructions that make it possible to determine the expected data and how to perform the operation.
45	3.3.3 - Error Suggestion	AA	Met	The application provides information that allows the user to understand the cause of the detected issue and how to correct it.
46	3.3.4 - Error Prevention (Legal, Financial, Data)	AA	Met	Before deleting data, the application requires confirmation of the operation and allows it to be cancelled; the confirmation message is read by TalkBack.
47	4.1.1 - Parsing	A	Met	No separate parsing issues were identified; information about the native application interface is exposed through Android accessibility mechanisms.

No.	Criterion	Level	Status	Description
48	4.1.2 - Name, Role, Value	A	Not met	Some interface elements do not expose full information about their name or state to TalkBack. The map zoom-out button is read only as "button", and the selected state of a saved point is not communicated to the user.
49	4.1.3 - Status Messages	AA	Not met	The message "No addresses found" appears visually after a search with no results, but it is not automatically announced by TalkBack and requires manual focus movement.