Dated: 07 July 2020

Subject: Amendment to TCF Policy v2.0 CTA requirements

Dear TCF CMPs and Vendors,

The Transparency and Consent Framework (TCF) Steering Group have approved an amendment to the TCF Policy v2.0. The amendment aims to prohibit practices that unfairly steer users towards a particular choice or make user choices unreadable or invisible, by requiring identical text treatment and a minimum 5:1 contrast ratio for Framework UI calls to action.

Specifically, the new Appendix B, Policy C(g) is formulated as follows:

\[(g) \text{ Calls to action in a Framework UI must not be invisible, illegible, or appear disabled. While calls to action do not need to be identical, to ensure they are clearly visible, they must have matching text treatment (font, font size, font style) and, for the text of each, a minimum contrast ratio of 5 to 1. To the extent that an Initial Layer has more than two calls to action, this policy only applies to the two primary calls to action.}\]

Please note that multiple online tools exist to accurately test contrast ratios. See for example https://contrast-ratio.com/. Also note that examples of what are considered acceptable and unacceptable practices will be provided in the CMP interface requirements section of the TCF implementation guidelines, which can be found here. Examples are also included below.

The latest version of the TCF Policy document is now in Version 2020-04-08.3.1. You can consult the up-to-date TCF Policy text here.

Important: The CMP Validator tool will be updated with this new requirement. We will update CMPs that have already been validated for TCF v2.0 if re-validation of their 1st layer implementation is needed.

Examples
Not acceptable: different text treatment of calls to action

Not acceptable: too low contrast ratio of settings call to action

Not acceptable: too low contrast ratio of settings call to action
IAB Europe
Rond-Point Robert
Schumanplein 11
1040 Brussels
Belgium
iabeurope.eu

Acceptable: matching text treatment and sufficient contrast ratio

Acceptable: matching text treatment and sufficient contrast ratio

Acceptable: two direct actions with matching text treatment and sufficient contrast ratio. The indirect action may be treated differently

IAB Europe Team

Address:
Rond-Point Schuman 11
B-1040 Belgium
T +32 225 675 33
W www.iabeurope.eu