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The European Accessibility Act (EAA) and Digital Accessibility

Quick facts about EAA compliance: What to know and how to prepare

The European Accessibility Act (EAA) mandates that a range of consumer products and services, including digital experiences such as e-commerce websites and mobile apps, are accessible to people with disabilities. The Act became law in 2019, and providers of products and services covered by the EAA have until June 2025 to bring those products and services into compliance.

With this deadline quickly approaching, you may be wondering whether the EAA applies to your organization—and, if so, how to meet its requirements. **In this piece, we outline what types of products and services the EAA applies to, the standards for compliance, and long-term strategies for success.**

Conduct business in the EU? The EAA likely applies.

EAA compliance is required for any organization conducting business in the European Union (EU)—regardless of where that organization is based. For example, an e-commerce company based in the U.S. that sells to EU consumers is subject to EAA compliance. Similarly, a U.S.-based hotel offering online bookings to EU-based consumers must ensure its booking site meets EAA compliance requirements.

Applicable products and services

The EAA requires accessibility for commonly used consumer hardware and software, as well as services related to communication, commerce, finance, education, and transportation.

Products:

- Computers and operating systems
- Smartphones and communication devices
- Digital television equipment
- ATMs, payment terminals, and informational / interactive self-service terminals
- E-readers
- Ticketing and check-in machines

Services:

- Telecommunication services
- Banking
- E-commerce
- Transport service user information sources, along with websites, mobile services, and kiosks for air, bus, rail, and water transport
- E-books
- Audio-visual media services (AVMS)
- European emergency number (112)

Exceptions

Certain types of digital content qualify as exceptions to the EAA, meaning they are not required to meet the law's accessibility requirements. These exceptions include:

- Pre-recorded time-based media published before June 28, 2025
- Office file formats published before June 28, 2025
- Online maps and mapping services, if essential information is provided in an accessible digital manner for maps intended for navigational use
- Third-party content that is neither funded by, developed by, nor under the control of the economic operator concerned
- Content of websites and mobile applications qualifying as archives (only containing content that is not updated or edited after June 28, 2025)

What are the requirements for EAA compliance?

While the EAA does not include specific technical standards for digital accessibility, the European standard EN 301 549 is the presumptive benchmark for compliance. EN 301 549 currently incorporates the Web Content Accessibility Guidelines (WCAG) 2.1 AA standards and is being updated to adopt WCAG 2.2 AA. As a best practice for EAA compliance, organizations should ensure applicable products and services conform with WCAG 2.2 AA along with EN 301 549.

Importantly, however, meeting these technical standards alone won't guarantee EAA compliance. National laws adopting the EAA outline requirements for how accessibility is managed within an organization. Common national requirements for product and service providers include implementing accessibility training for employees, and monitoring accessibility on an ongoing basis to account for changes in a product or service or in accessibility standards.

Many nations also mandate that product and service providers publish an accessibility statement containing:

Information about the functionality of a product / service

Documentation of a product / service's technical accessibility specifications and design processes

A description of how a product / service meets the EAA's accessibility requirements

The names of enforcement authorities to which users can file accessibility complaints

Additional requirements around accessibility information, packaging, and labelling apply to covered products.

What about third-party products?

If your organization has integrated technology from a third-party vendor into your product or service, you are responsible for the compliance of that third-party technology. Your procurement policies should include requirements for validating the accessibility of third-party products prior to purchase. As part of this validation, you'll want to obtain documented proof of a third-party product's accessibility, in the form of a completed Voluntary Product Accessibility Template (VPAT®). At your request, a vendor should provide a completed VPAT confirming its product meets applicable WCAG standards.

How will the EAA be enforced?

Individual EU nations will monitor the market to ensure that products and services comply with the EAA. In fact, the law requires that nations establish processes for performing this monitoring. Organizations found to be non-compliant may face penalties, which vary from country to country. Potential penalties include steep fines, the removal of products or services from the market, and the suspension of an organization's right to do business.

Act now to meet EAA requirements.

Ensuring WCAG conformance takes time, especially when managing multiple, complex products and services.
To get started:

1 Secure budget to support your accessibility goals, including engaging third-party expertise.

2 Understand what products or services in your portfolio are subject to EAA compliance.

3 Audit those assets to gauge their state of accessibility.

4 Create a plan for fixing any accessibility errors, including securing any support resources needed.

5 Establish accessibility monitoring for each product or service to flag any new WCAG violations that may be introduced with content or feature updates.

For long-term success, implement role-specific accessibility training so that your teams are equipped to fix newly introduced accessibility issues. Training will also help your teams understand how to incorporate accessibility considerations into every stage of the digital experience creation life cycle.

Leverage Level Access for software and support.

Level Access understands the complexities of compliance on a global scale. We've worked with many international enterprise organizations, helping them understand their legal obligations and equipping them with the software and support required to ensure ongoing compliance for their entire digital portfolio.

To understand how we can help you meet your unique accessibility objectives, including compliance with the EAA, engage a member of our team today.

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