

The European Accessibility ACT (EAA): Your Comprehensive Guide



The European Accessibility Act (EAA) sets new, harmonized accessibility standards for organizations doing business in the EU.

[Tracing its roots back to 2011](#) and complementary to the European Web Accessibility Directive (WAD) of 2016, the European Accessibility Act mandates compliance for most European public-sector businesses by June 2025.

The Origins of the European Accessibility Act

The European Accessibility Act is often contrasted with the European Web Accessibility Directive of 2016, formally known as [Directive 2016/2102](#).

That directive arrived with an earlier timeline and narrower scope, but it shared accessibility standard with European Accessibility Act, making it arguably a dress rehearsal for the latter's implementation.

The directive was adopted by the European Parliament and Council in October 2016 and sought to:

*“...ensure that websites and mobile applications of public sector bodies are ‘more accessible’, particularly for people with disabilities, by making them ‘**perceivable, operable, understandable and robust**’”*

The Web Accessibility Directive included several key milestones for implementation:

- **September 2018** - Member States needed to transpose the directive into their own national legislation. During the transposing process, Member States were required to maintain a minimum level of harmonization with each other. This level could be exceeded (as France chose to do in updating the country's Law No. 2005-102 of 11 February 2005 and Decree No. 2019-768 of 24 July 2019 if minimum harmonization was still maintained.)
- **September 2019:** All new public sector websites needed to conform with the directive.
- **June 2021:** All public sector mobile applications needed to conform with the directive.
- **September 2021:** The public-sector websites of all member states needed to be monitored and reported publicly.

It's important to note that the European Accessibility Directive is not itself a technical standard for assessing accessibility.

Instead, the directive referenced the [EN 301 549 European Standard for accessibility](#), which—much like the WCAG—has received steady updates since its initial release in 2015.

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How the European Accessibility Act Complements Previous Accessibility Efforts

Like the Web Accessibility Directive, the European Accessibility Act is not an accessibility standard in itself. However, it adopts the same EN 301 549 Standard as the Directive for its accessibility criteria.

The Web Accessibility Directive primarily applies to the websites and mobile applications of the European public sector. However, the European Accessibility Act applies to the European private sector and covers many more digital experiences beyond websites and mobile apps.

- **April 2019:** Conformance with the EAA took effect as a directive for EU Member States.
- **June 2022:** Member states needed to adopt and publish their own laws and administrative provisions needed for compliance.
- **June 2025:** The provisions of the EAA are no longer a directive and instead become required, with customers now able to file complaints for non-compliance.

The European Accessibility Act seeks to reduce barriers to international trade, which wasn't an explicit focus of previous EU accessibility legislation. The Act does this by removing divergent accessibility criteria that individual Member States may have, making it easier for the private sector to achieve compliance.



Who is Covered by the European Accessibility Act?

The European Accessibility Act applies to the majority of organizations doing business in the European Union.

The Act does not apply to some smaller businesses dubbed “micro-enterprises” in the Act—because compliance may create an “undue burden” for them.

These micro-enterprise businesses

- Have fewer than 10 employees
- Have an annual turnover of less than two million euros or an annual balance sheet total not exceeding that amount

As of 2021, EU businesses with fewer than 10 employees only represented ~20% of the Union’s total non-financial business economic value.

In other words, EU businesses responsible for ~80% of the Union’s economic value may be covered by the European Accessibility Act.



Which Products and Services Are Covered by the European Accessibility Act?

The European Accessibility Act provides a high degree of specificity on what it covers.

[Per the European Commission's summary](#), at the product level, these experiences include:

- Computers and operating systems
- E-readers
- Ticketing and check-in machines
- ATMs and payment terminals (including card payment machines in supermarkets)
- Smartphones and communication devices
- TV equipment



And at the service level, the EAA covers:

- Phone services
- Banking services
- E-commerce
- Websites, mobile services, electronic tickets and all sources of information for air, bus, rail and waterborne transport services
- E-books
- Access to Audio-visual media services (AVMS)
- Calls to the European emergency number 112



The list of covered products and services isn't long, but it covers a wide range of economic activity.

The inclusion of banking services alone means that financial institutions must make everyday online banking tasks like downloading statements, depositing checks, and accessing other account info accessible via keyboard navigation and screen readers.

The EAA does have some exceptions for the types of content that are covered. Those include:

- Pre-recorded time-based media published before June 2025.
- Office file formats published before June 2025.
- Online maps, if essential information is otherwise provided in an accessible way.
- Third party content that is not funded, developed, or under the control of the organization that has to be compliant.
- Archive content that won't be updated after June 2025.



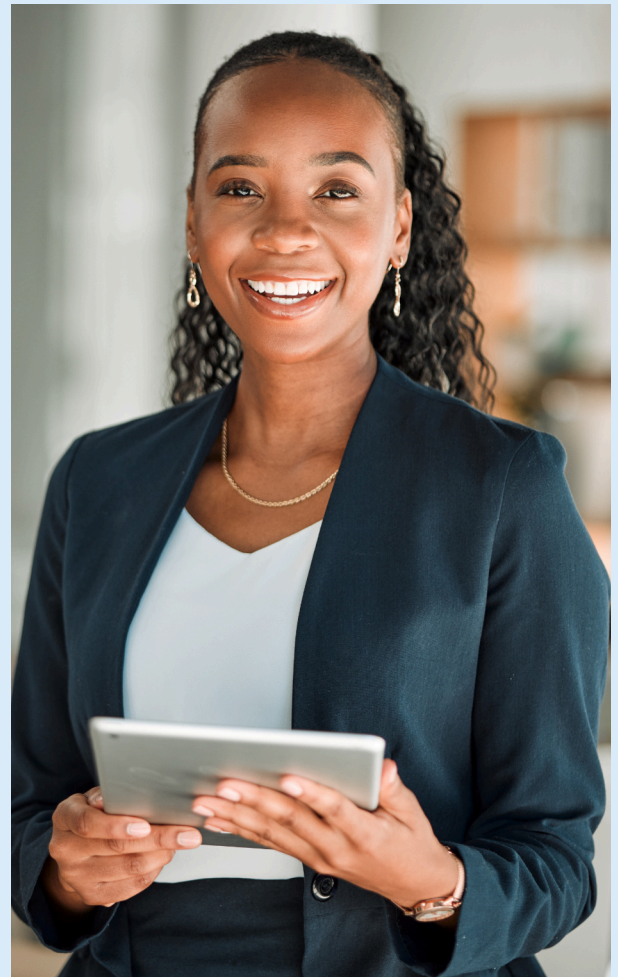
Key Points of the EN 301 549 Accessibility Criteria

The European Accessibility Act adopts the EN 301 549 standard for digital accessibility.

Version 2.1.2 of this standard—launched in 2018—was the first version to officially adopt WCAG guidelines, specifically WCAG 2.1 at the AA level of conformance.

Version 3.2.1 launched in 2021 and is the latest version of the EN 301 549 standard. Its launch precedes the World Wide Web Consortium (W3C)'s Recommendation of WCAG 2.2 in 2023. Consequently, a new version of EN 301 549 is in development and will most likely include WCAG 2.2 criteria.

Businesses looking to future-proof their accessibility efforts will adopt WCAG 2.2 criteria early to anticipate this standard's inclusion in the EN 301 549 standard.



Complying with EN 301 549 Doesn't Equate to full EAA Compliance



It's important to note that compliance with EN 301 549 does not guarantee full compliance with the EAA.

The European Accessibility Act includes additional provisions on how accessibility is managed within the organization, including but not limited to reporting on accessibility, training on accessibility, creating an accessibility statement, and more.

It's best to [talk with an accessibility expert](#) to learn more about full compliance with the European Accessibility Act, beyond adherence to the EN 301 549 Standard.

The Penalties for Noncompliance with the European Accessibility Act

When compliance with the EAA becomes required in June of 2025, customers will be able to file complaints with national authorities and other agencies, which will vary depending on the Member State.

Failing to comply may result in several negative consequences for the offending organization, depending on the Member State, as well as the severity and context of the offense:

Fines (up to 5% of the previous year's income in Italy)

Prison sentences (up to 18 months [in the case of Ireland](#))

Removal from the European market

Exclusion from the procurement process, since EAA compliance may become more commonly required in procurement processes

Brand reputational damage

As mentioned above, working to comply with WCAG 2.2 standards is currently the best way to future-proof your business for the newest version of EN 301 549 when it is released, and with the European Accessibility Act generally.

About UsableNet

UsableNet is a pioneer in digital accessibility and trusted by Fortune 500 companies to help ensure accessible experiences for customers and avoid accessibility-related litigation.

[Talk to an accessibility expert today](#) to learn how you can comply with the European Accessibility Act.



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