

European Accessibility Act

A Checklist for Business Compliance
and Inclusive Design





Under the EAA, you can face significant fines for non-compliance, ranging from €5,000 to €250,000+ per violation, with ongoing daily penalties up to €1,000 until issues are resolved.


The European Accessibility Act (EAA), formally Directive (EU) 2019/882, sets a harmonized accessibility framework across the European Union. It requires that key digital products and services be usable by people with disabilities – including visual, auditory, physical, cognitive, and speech-related impairments.

This guide provides a breakdown of the EAA's scope, the requirements for businesses, and how to implement accessibility at both organizational and product levels.

So, in a nutshell:

The EAA introduces mandatory accessibility obligations across a wide range of industries.

- ✓ It extends legal accessibility requirements to the private sector, including e-commerce, banking, telecom, and transport.
- ✓ Compliance is based on the European Standard EN 301 549, which includes WCAG 2.1 Level AA requirements for websites, mobile apps, documents, and user interfaces.
- ✓ The law aims to remove fragmentation across member states by aligning national laws.



Why the EAA Matters for Businesses

- The market of people with disabilities in the EU alone exceeds **87 million** citizens. That represents significant purchasing power, all directed to your newly accessible platforms.
- Businesses that fail to comply may face fines, legal action, or market exclusion, depending on how each EU Member State enforces the directive. Non-compliance also poses serious reputational risks and potential user loss, on top of potential hefty fines on a state-level.
- Moreover, the EAA aims to eliminate accessibility barriers and promote cross-border digital trade. It addresses fragmented national rules, which helps you gain smoother access to the EU's single market.
- Accessibility also aligns with wider EU policy goals on inclusion and equality (UNCRPD, EU Charter of Fundamental Rights). Plus, inclusive design has been proven to boost usability for all users, not just those with disabilities.

Scope of the EAA – What Products and Services Are Covered?

As per Annex I of the EAA

Covered products include:

- ✓ Computers and operating systems (desktops, laptops, OS software)
- ✓ Smartphones, tablets, and e-readers
- ✓ Payment terminals and ATMs
- ✓ Self-service terminals, including:
 - Ticket machines
 - Check-in kiosks
 - Parcel lockers
- ✓ Smart TVs and digital TV equipment (including TV receivers and interfaces)
- ✓ E-book reading devices (hardware and bundled software)



Covered services include:

- ✓ E-commerce services (websites, apps, platforms selling goods/services online)
- ✓ Online banking and fintech platforms (including mobile banking apps, crypto, investment platforms)
- ✓ Telecommunications services, including:
 - Electronic messaging (SMS, chat, email)
 - VoIP and other digital communication services
- ✓ Audiovisual media services, including:
 - On-demand platforms
 - Electronic programme guides
- ✓ E-book reading devices (hardware and bundled software)
- ✓ Passenger transport services, including:
 - Booking websites and apps
 - Ticketing kiosks or digital access points for air, rail, bus, and ferry services

Emergency communication access, such as:

- ✓ Services enabling access to the EU-wide emergency number 112 through voice, SMS, or equivalent means

EAA Compliance is not optional

Whether you're retrofitting an existing platform or building something new, we'll help you get it right — and keep it right.

[Talk to a Zitec Accessibility Expert](#)

What the EAA Actually Demands

When it comes to the European Accessibility Act, there's a lot of buzz around "compliance". What does that really mean? If you're responsible for digital products or services in the EU, here's what you need to know.:



First, the EAA is built on concrete technical standards. At the core are the **POUR principles** (a foundational accessibility model):



PERCEIVABLE

Can users actually **see** or **hear** what you're presenting?



OPERABLE

Can they navigate with a keyboard or assistive tech?



UNDERSTANDABLE

Are forms and content clear, consistent, and predictable?



ROBUST

Will your product work with current and future tech, like screen readers?



DON'Ts &

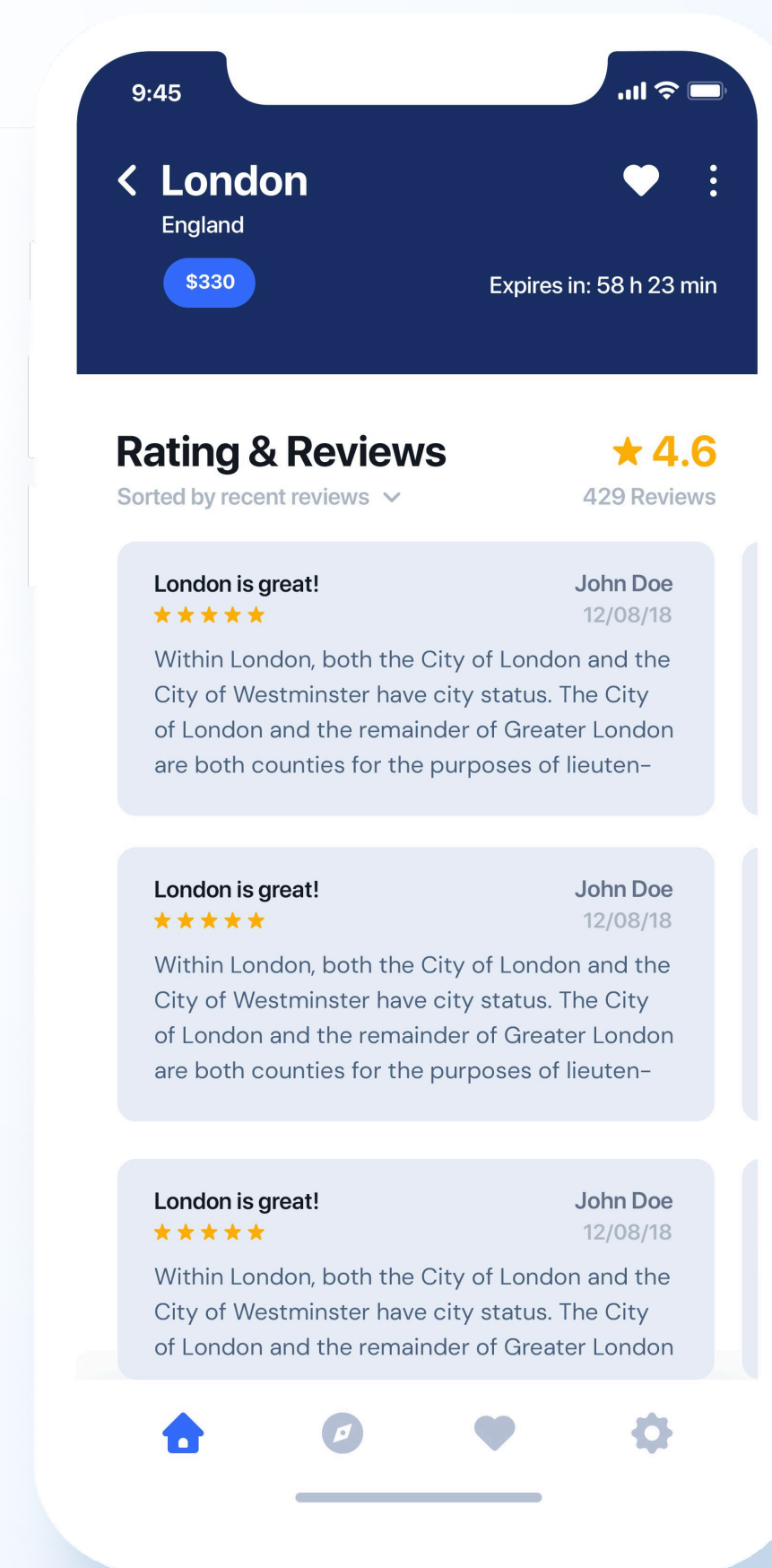


DOs

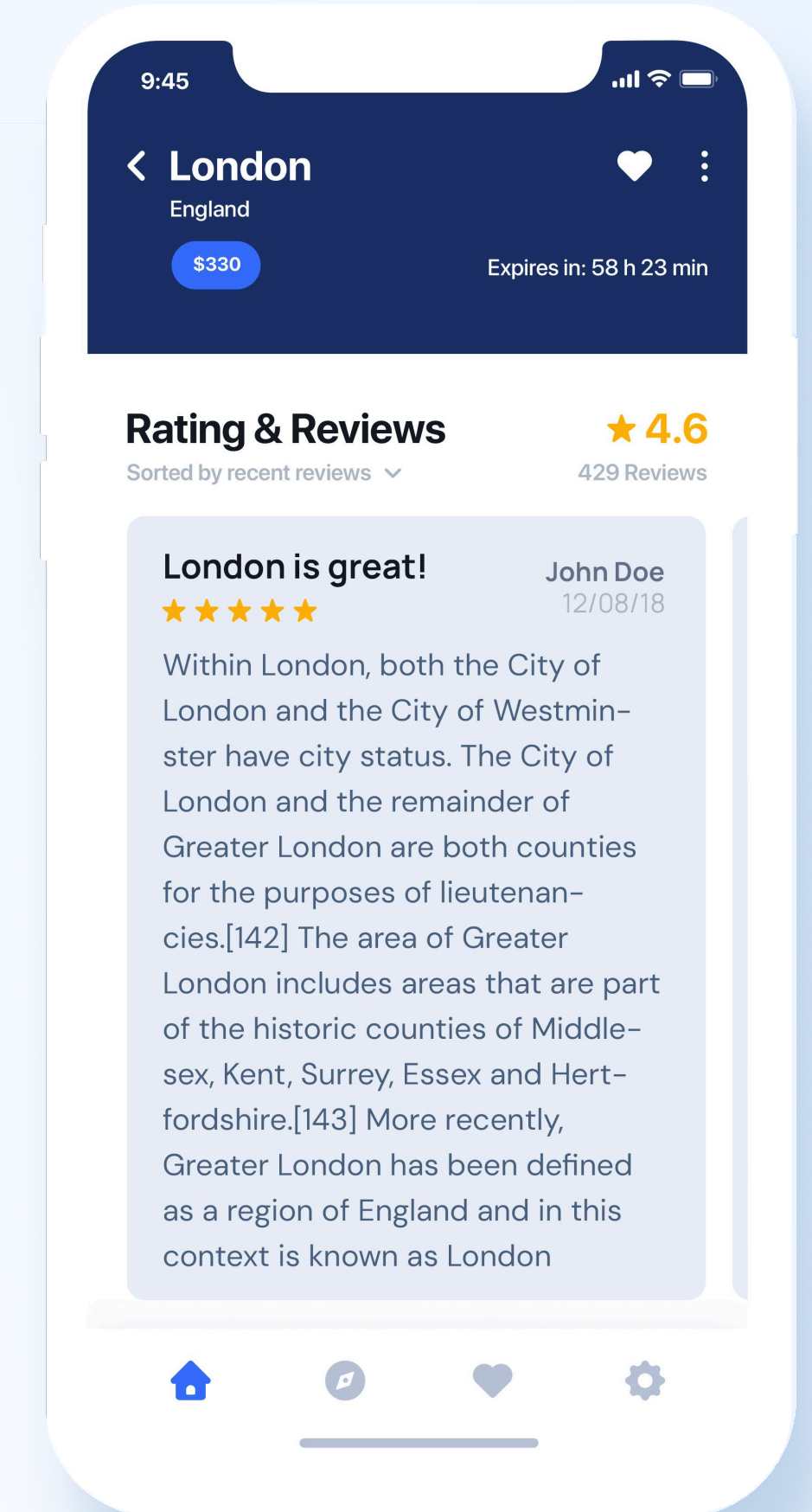
———— Some examples



PERCEIVABLE - SEE



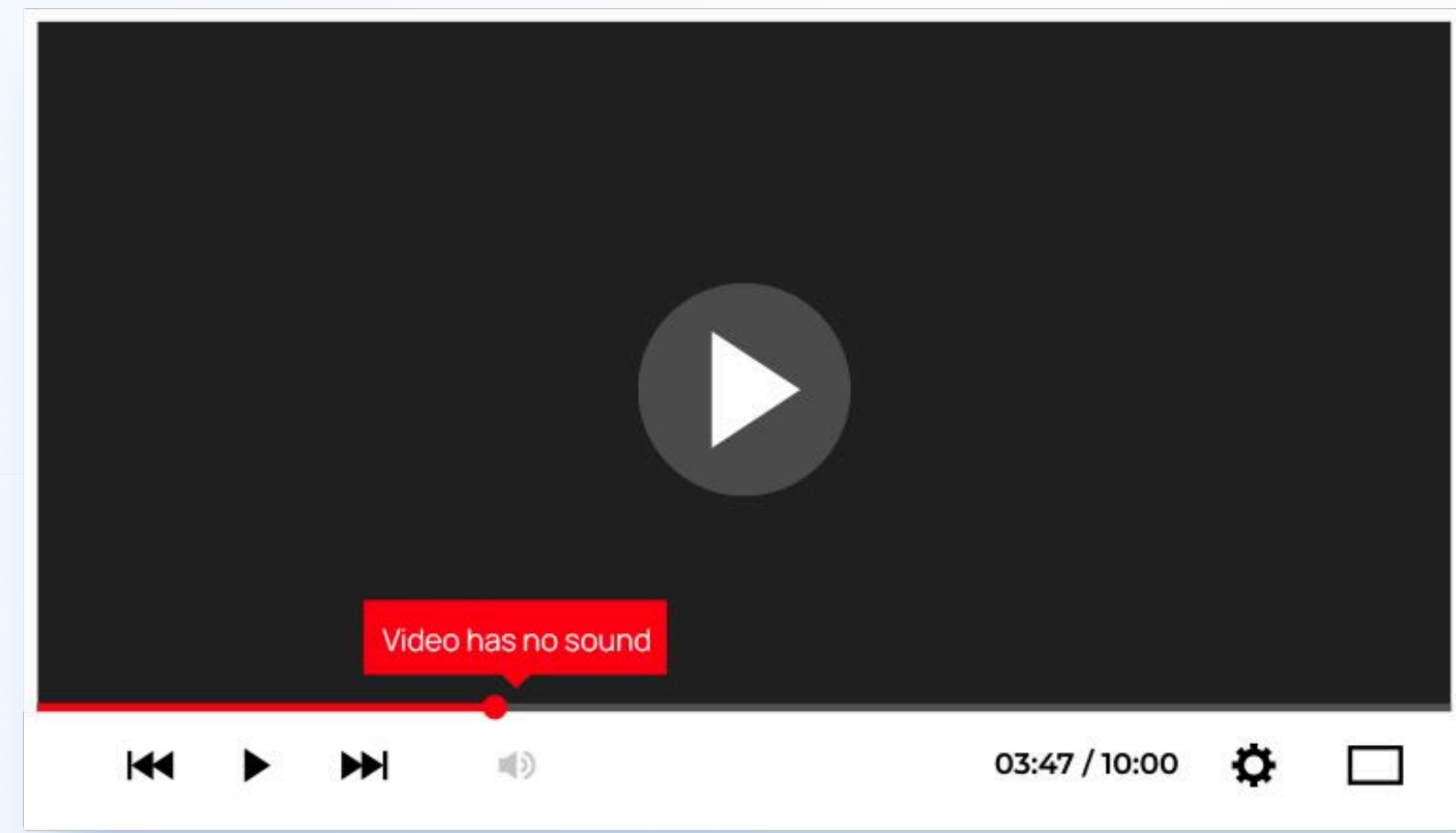
Poor contrast and repetitive layout make it hard to scan or read.




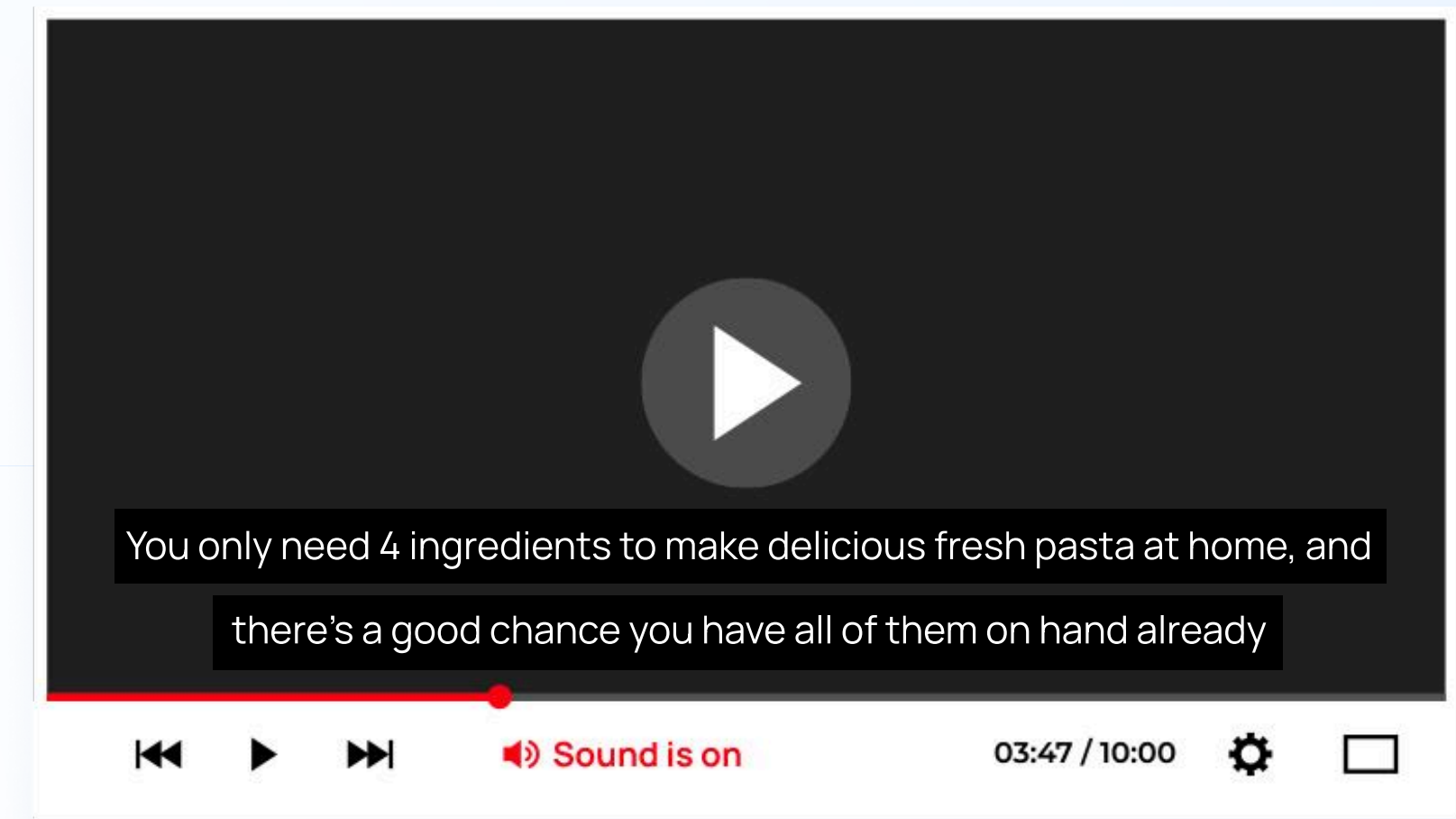
Clear structure, contrast, and spacing help all users understand content quickly.




PERCEIVABLE - HEAR

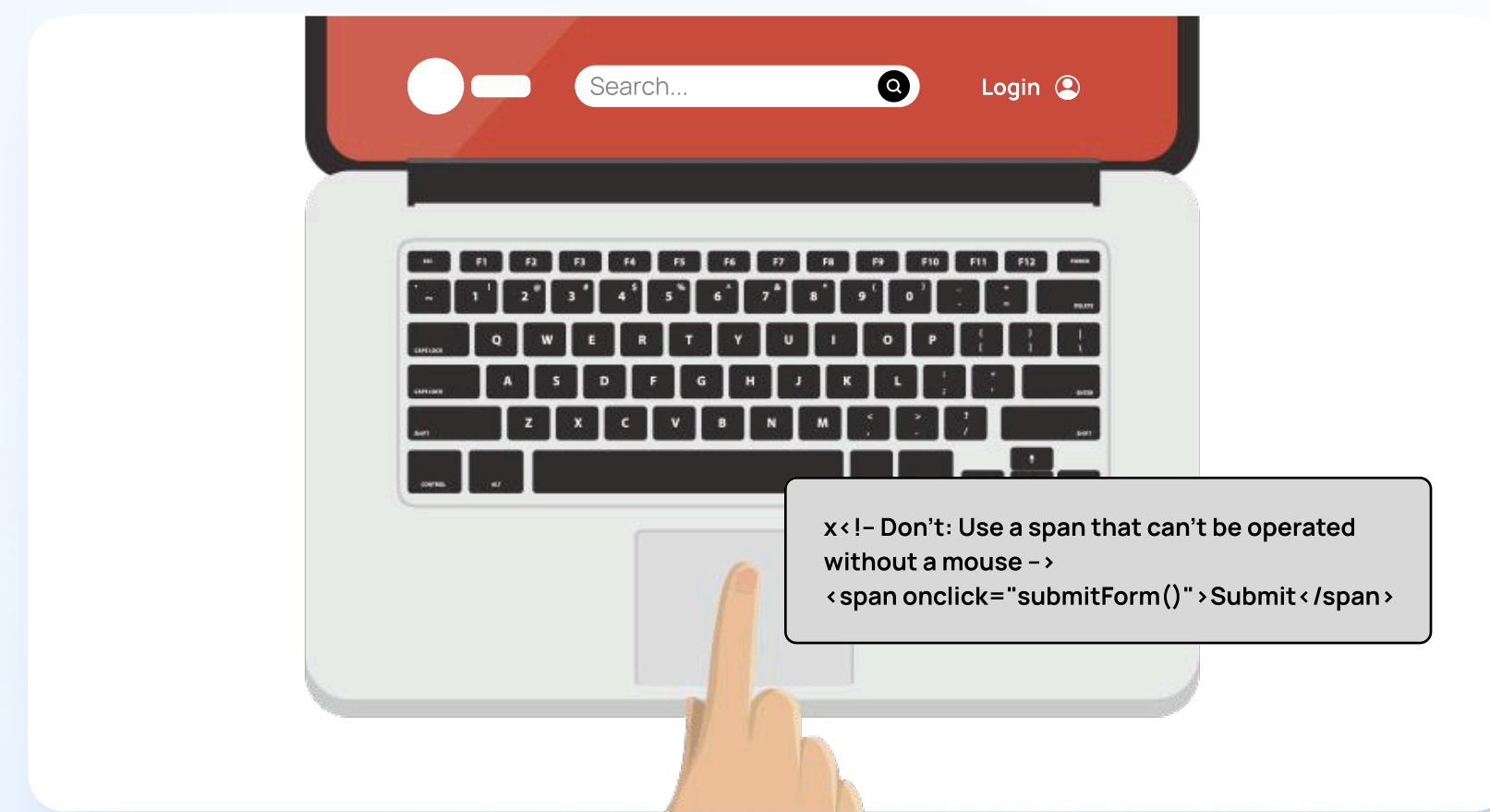



 No sound or captions — excludes users who rely on hearing or transcripts.

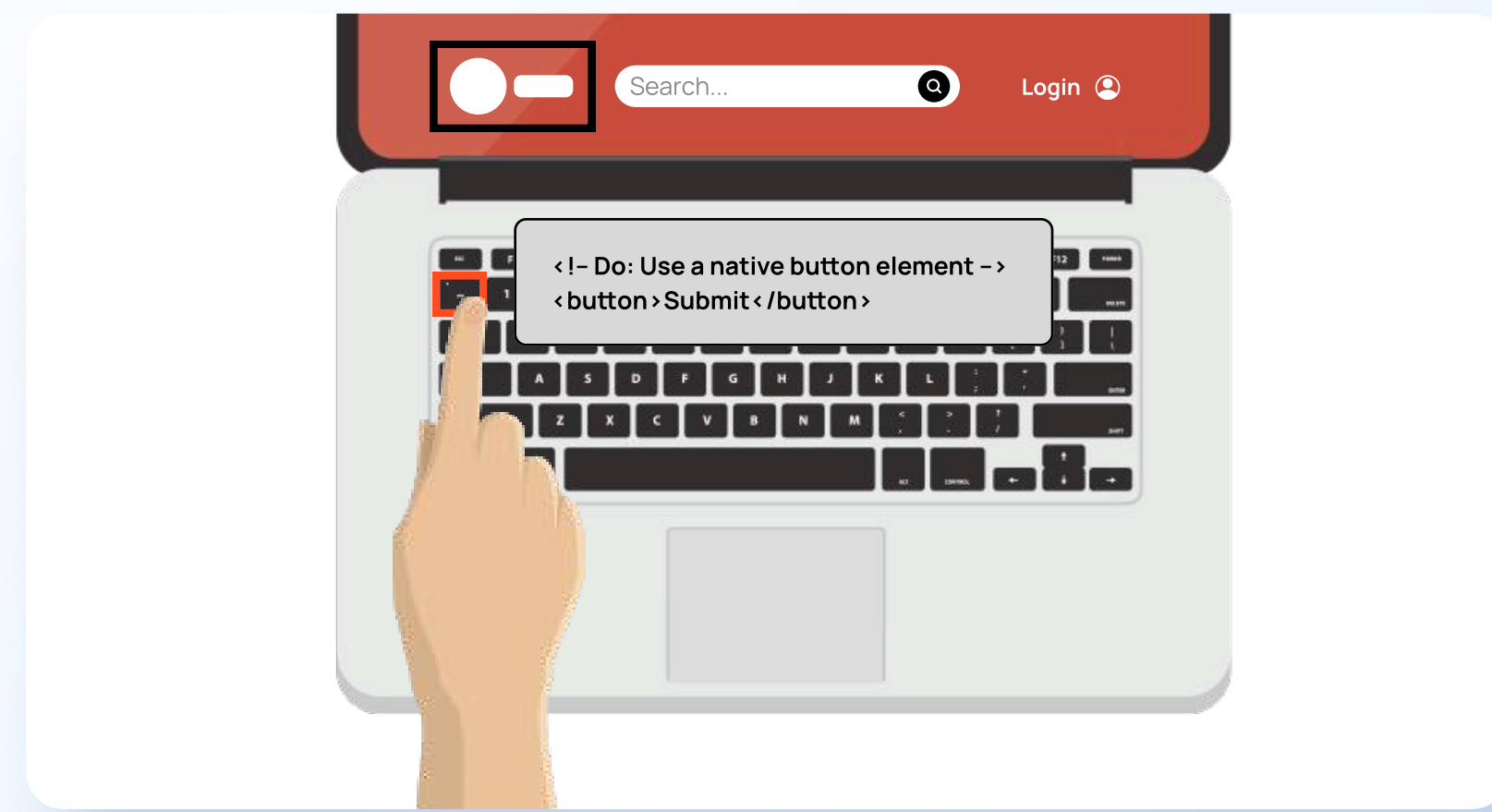



 Sound or captions make audio content accessible to everyone.

OPERABLE



 Non-semantic code can't be accessed with a keyboard or screen reader.



 Use native elements like `<button>` so all users can interact, with or without a mouse.



UNDERSTANDABLE

GET IN TOUCH

All fields marked with * are required

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GET IN TOUCH

Vague labels and errors confuse users and slow down form completion.

GET IN TOUCH

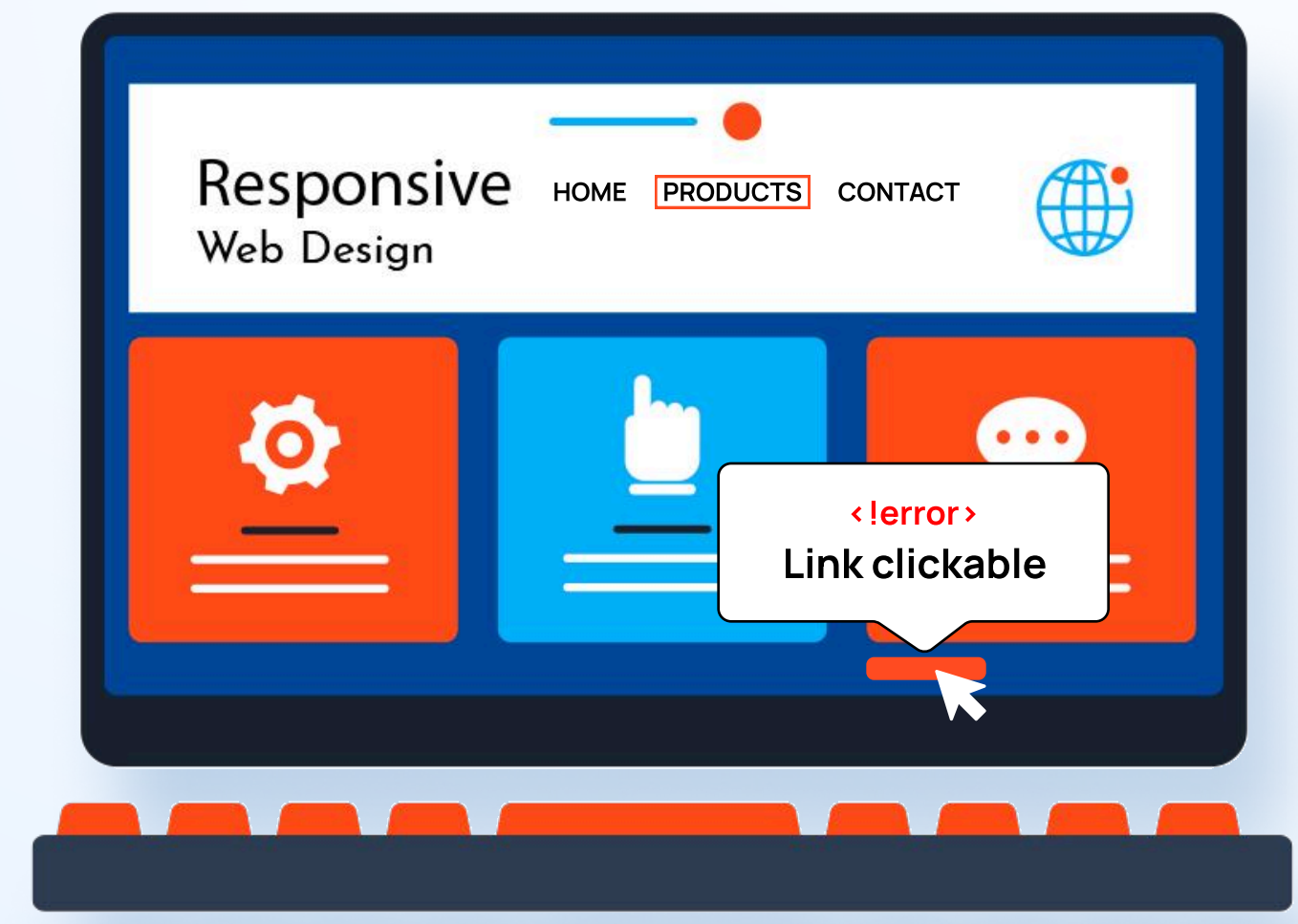
We are happy to answer any question you have or provide you with an estimate. Just send us a message with any questions you may have.

All fields marked with * are required

SEND MESSAGE

Clear field labels and helpful messages guide users through the form with ease.


ROBUST



Generic HTML and poor labeling confuse assistive tech.







Semantic, accessible code ensures compatibility with screen readers and future tools.




These are included in the **WCAG 2.1 Level AA** standard, which is the baseline for all digital accessibility under the EAA.

The legal implementation is handled through **EN 301 549**, version 3.2.1. If you've heard of WCAG, this standard takes it further, as it translates accessibility from web-only into a much broader scope:

-  **Websites and mobile apps**
-  **Software and operating systems**
-  **Self-service terminals, ATMs, kiosks**
-  **Digital documentation, support channels, and product guides**

A Few Things to Get Straight:

- **You can't "overlay" your way into compliance.**
The European Commission is clear: overlays, widgets, and plugins that claim to "magically" fix accessibility issues on top of an existing interface? They don't cut it. These tools can interfere with assistive technologies and often create new barriers instead of removing old ones.
- **Accessibility needs to be built-in, not bolted on.**
That means thinking about accessibility from the start of your design and development cycle, not trying to patch it on at the end. The phrase the EU uses is "by design and by default."
- **You'll need to document your efforts.**
For digital services, a public Accessibility Statement is required. It needs to clearly outline your level of compliance, any known limitations, and contact info for users who need accessible alternatives.
- **If you're offering physical products like kiosks or payment terminals, there's more:**
You may also need to prepare a Declaration of Conformity, maintain technical documentation, and ensure CE marking. These confirm that the product meets all relevant EU safety, performance, and accessibility requirements.



Organizational Checklist for EAA Compliance

1 Assign Responsibility and Secure Leadership Support

EAA compliance isn't a box to tick. It touches every stage of your digital product lifecycle, so it requires **cross-functional ownership**.

- **Form a central accessibility governance group** that includes stakeholders from product, legal, engineering, design, marketing, QA, and support.
- Secure **formal executive sponsorship**, and document accountability at the C-level (Chief Product Officer, CTO, CMO, etc.).
- Confirm or increase the **budget allocation** for remediation, testing tools, assistive tech licenses, training, and external audits.

Make accessibility a standing agenda item in roadmap and release planning meetings. Treat it as a non-negotiable product requirement, not a separate project.

EAA Compliance is not optional

If your digital products or services fall under the EAA, now's the time to act.

[Start your compliance audit with Zitec](#)

2 Build an Accessibility Roadmap

Focus on:

- **Confirming scope** - Re-audit your digital estate to identify which assets (apps, websites, kiosks, documents, service portals) fall under EAA.
- **Prioritizing high-impact assets** - Focus on customer-facing journeys, transactional flows, onboarding, checkout, support, and authentication screens.



- **Finalizing technical remediation plans** – Make sure tickets are written, assigned, and linked to WCAG/EN 301 549 clauses.
- **Scheduling validation windows** – Plan for buffer time between final fixes and the compliance deadline for third-party audits and internal QA. Include a rollout timeline for Accessibility Statements, CE markings (where required), and internal sign-offs.

3 Provide Role-Specific Accessibility Training

Generic training won't stick. Make it **contextual, hands-on, and integrated into existing workflows**.

- **Designers** – Semantic HTML, ARIA roles, alt text, label association, keyboard operability, screen reader compatibility.
- **Q/A Testing** – How to structure test plans around WCAG 2.1 AA, EN 301 549 clauses, and assistive tech paths.
- **Legal/Compliance** – Deep understanding of documentation requirements, declarations of conformity, and risk management.
- **Customer support & marketing** – Use of plain language, alternative formats, accessible PDFs and emails, and communication with users who raise accessibility issues.

4 Test Effectively

Set up assistive tech test rigs (e.g., NVDA on Windows, VoiceOver on Mac/iOS, TalkBack on Android). Create user workflows to validate login, form submissions, checkout, search, and navigation paths with screen readers and keyboard only.

Log all defects with WCAG/EN references and severity ratings. Make sure developers understand the **why**, not just the **what**.

Manual testing with real users (especially those who use screen readers or switch control) is the gold standard, so we encourage you to budget time for this.

5 Maintain a Legally-Compliant Accessibility Statement

By law, every digital service covered by the EAA must include a public-facing accessibility statement. It must:

- Declare the conformance level (e.g., WCAG 2.1 AA).
- List non-accessible content, with a clear explanation.
- Explain accessible alternatives (PDF versions, customer support contact, etc.).
- Provide contact details and describe how users can submit feedback or request accessible formats.



6 Continuously Monitor and Document Progress

As we near the deadline, documentation becomes as important as delivery. Regulators may request evidence of your efforts.

- Maintain a remediation log: For each issue, log the defect, reference criterion, resolution date, and method used.
- Store test results (both automated and manual) tied to specific versions/releases.
- Archive internal decision-making records: if you've claimed a disproportionate burden or technical infeasibility, keep that justification.
- Make sure all accessibility updates are included in release notes or change logs.

Set up a shared repository for accessibility documentation, accessible to your compliance/legal and product owners.

7 Define Role-Specific Implementation Tactics

Accessibility must be operationalized within each team's workflow. Below is a breakdown of what matters most per function to ensure compliance is implemented meaningfully:

Product Managers

Make sure accessibility is not added as a late requirement, but starts at scoping.

- Embed WCAG 2.1 AA and EN 301 549 clauses in functional specs (e.g. "All interactive elements must be operable via keyboard without traps").
- Prioritize accessibility fixes alongside features, don't defer them to "post-MVP."
- Use sprint reviews to confirm accessibility is part of "done," not "nice-to-have."

UX & Visual Designers

Accessibility starts in the wireframe, not in QA.

- Design for flexibility. For example, layouts must accommodate 200% zoom and reflow without hidden content or horizontal scroll.
- Apply tested contrast tokens, avoid relying solely on color, and implement consistent spacing for readability.
- Provide clear guidance for devs on semantic hierarchy and alternative text logic (especially for complex infographics or icon-only UIs).



Frontend Developers

You're responsible for implementation integrity.

- Ensure full keyboard operability (tab order, skip links, visible focus states, ESC behavior on modals).
- All form inputs must include programmatically associated labels, error messaging, and accessible status updates (e.g. using aria-live).



QA/Test Engineers

Testing accessibility is part of functionality, so make sure to:

- Validate against all relevant WCAG success criteria, especially keyboard flow, focus behavior, and form validation.
- Run regression paths with screen readers (NVDA, VoiceOver) for all critical flows: login, signup, checkout, search.
- Maintain a defect log that ties each issue to specific WCAG or EN 301 549 clauses, to support both remediation and audit defensibility.



Legal & Compliance

Own the regulatory traceability and audit readiness.

- Maintain Declarations of Conformity and technical documentation for products under scope (e.g., kiosks, OS-level software).
- Track risk decisions (e.g. any use of “disproportionate burden” clauses), backed by evidence.
- Understand how each Member State enforces the directive — deadlines, monitoring bodies, penalties.



Marketing, Content & Comms

Everything external-facing must meet WCAG 2.1 AA. This includes:

- All PDFs, videos, newsletters, and campaign pages, which must be fully accessible (including tagged PDFs, captions, readable text, and non-color-based messaging).
- Email templates, social banners, and images must always provide alt text and descriptive subject lines.
- If publishing reports or data visualizations, include descriptive text summaries and accessible table formats.



If your product isn't accessible, it's not ready

By 2025, accessibility isn't a nice-to-have. It's law. But it's also a fast track to better UX, SEO, and customer retention.

We'll help you figure out what's in scope, where the gaps are, and how to fix them, without slowing down your roadmap.

EAA Compliance is not optional

Audit. Remediate. Build right.

[Talk to our accessibility team](#)