

Is your product ready for the European Accessibility Act?

A practical, jargon-free self-assessment for teams selling digital products or services into the EU — 30 checks across scope, deadlines, technical conformance, testing and documentation. Tick what is true today and see where you stand.

By **Matthaios Mantzios** — UX & accessibility specialist, author of *Web and Mobile Accessibility: A Comprehensive Guide to WCAG 2.2, the ADA, and the European Accessibility Act*. Athens, Greece.

Read this first. The EAA is an EU directive, which means each member state writes it into its own national law. Scope, enforcement and penalties vary by country. This checklist is a practical starting point for scoping your risk — it is not legal advice, and it is not a substitute for advice from a qualified lawyer in the markets where you operate.

01 Does it apply to you?

The EAA (Directive (EU) 2019/882) covers specific products and services sold to consumers in the EU. Where you are headquartered does not matter — where you sell does. Tick everything that is true.

- ☐ **We sell products or services to consumers in the EU.**
Including selling into the EU from outside it. A US or UK company with EU customers is in scope.
- ☐ **We operate an e-commerce site or app.**
Consumer-facing online sales are explicitly named in the directive.
- ☐ **We provide banking, payment or other consumer financial services.**
- ☐ **We provide telecoms, transport or audiovisual media services.**
Including ticketing, check-in and streaming platforms.

☐ **We publish e-books, or sell e-readers or reading software.**

☐ **We make consumer hardware with digital interfaces.**

Computers, operating systems, smartphones, TV equipment, ATMs, payment terminals, self-service kiosks.

☐ **We are *not* a micro-enterprise providing services.**

Service providers with fewer than 10 staff *and* turnover or balance sheet at or below €2m are generally exempt. The exemption is narrower for products — check your national transposition.

02 The dates that actually matter

The most common misconception is that there is still runway. There is not — the main obligation is already live.

28 Jun 2025

Obligations applied

Products placed on the market and services provided from this date must comply. This is not upcoming — it has already happened.

28 Jun 2030

Legacy service contracts

Service contracts agreed before June 2025 may continue unchanged until this date at the latest.

Up to 2045

Self-service terminals

Terminals already in use may continue for up to 20 years from first use. This does not extend to your website or app.

Watch: 2026

EN 301 549 v4.1.1

The updated harmonised standard aligned to the EAA is expected to be cited in the Official Journal. Conformance with the cited version gives presumption of conformity.

03 Technical conformance

The practical baseline is EN 301 549, which for web and mobile content maps closely to WCAG 2.1 Level AA. These are the failures behind the overwhelming majority of real-

world issues — start here.

- ☐ **Every interactive element is reachable and operable by keyboard alone.**
Unplug the mouse and complete your primary journey, including checkout or sign-up.
-

- ☐ **Focus is always visible.**
You can see where you are on the page at every step of that keyboard journey.
-

- ☐ **Text meets minimum contrast.**
4.5:1 for body text, 3:1 for large text and meaningful UI components.
-

- ☐ **Every meaningful image has useful alternative text.**
Describing purpose, not filename. Decorative images are marked as such.
-

- ☐ **Every form field has a programmatically associated label.**
Placeholder text alone is not a label.
-

- ☐ **Errors are identified in text and explain how to fix them.**
Colour alone never carries the message.
-

- ☐ **Link and button text describes its destination or action.**
No bare “click here” or “read more” out of context.
-

- ☐ **Headings are real headings, in logical order.**
Structure is marked up semantically, not simulated with bold text.
-

- ☐ **Content reflows at 400% zoom without horizontal scrolling.**
-

- ☐ **Video has captions; audio has a transcript.**
-

- ☐ **The mobile app works with VoiceOver and TalkBack.**
Tested on device, not assumed.
-

- ☐ **Nothing depends on colour alone to convey meaning.**
-

- ☐ **Time limits can be extended, adjusted or turned off.**
-

04 How you tested it

Automated tooling reliably catches only a portion of real barriers — commonly estimated at around a third to a half. A green score is a starting point, not evidence of conformance.

- ☐ **Automated scans run in CI, not just once before launch.**
- ☐ **Manual keyboard and screen-reader testing has been done on primary journeys.**
By someone who knows what correct behaviour sounds like.
- ☐ **We have tested with disabled users.**
The step most teams skip, and the one that surfaces what tooling cannot.
- ☐ **Accessibility is in our definition of done.**
Not a separate remediation project scheduled for later.

05 Documentation and duties

Conformance is not only technical. The EAA imposes paperwork obligations, and this is where otherwise-compliant organisations get caught out.

- ☐ **We publish an accessibility statement.**
Explaining how the service meets requirements, in accessible format, and easy to find.
- ☐ **There is a working feedback channel for accessibility problems.**
And someone is actually accountable for responding.
- ☐ **We hold technical documentation evidencing conformance.**
Products additionally require an EU declaration of conformity and CE marking.
- ☐ **Accessibility requirements are written into supplier and procurement contracts.**
Third-party widgets, payment flows and embedded content are still your liability.



Any exemption we rely on is documented and assessed, not assumed.

“Disproportionate burden” and “fundamental alteration” require a documented, periodically reviewed assessment — a reasoned argument you must be able to produce, not a box to tick.



We know which national authority regulates us in each market we sell into.

Enforcement is national, and it differs.

06 Reading your result

Any box ticked in section 01 means you are almost certainly **in scope** — the questions below are then about readiness, not whether the Act applies.

Fewer than 10 conformance checks ticked. You have material exposure today, not in 2030. Start with the keyboard journey and form labels — the fastest route to reducing both real barriers and legal risk.

10–20 ticked. Broadly on the right track, with gaps. The gaps are usually documentation (section 05) rather than code — and documentation is the cheapest part to fix.

More than 20 ticked. You are in good shape. The work now is keeping it that way: automated checks in CI, accessibility in your definition of done, and a watching brief on EN 301 549 v4.1.1.

Disclaimer. This checklist is provided for general information and does not constitute legal advice. The EAA is transposed into national law separately by each member state, and requirements, exemptions and enforcement vary. Verify your obligations with qualified legal counsel in the markets where you operate, and against the current cited version of EN 301 549.

FAQ

Questions about EAA & WCAG

Does the European Accessibility Act apply to my product?

The European Accessibility Act (EAA) applies to a broad range of products and services sold to consumers in the EU — including e-commerce, banking, transport, e-books and most consumer-facing websites and mobile apps — regardless of where the company is based. Obligations have applied since 28 June 2025. Microenterprises providing services may be exempt, but the safest position is to assume you are in scope until confirmed.

Which WCAG version does the EAA require?

The EAA is implemented through the harmonised European standard EN 301 549, whose current version references WCAG 2.1 Level AA as the operative benchmark for web content. WCAG 2.2 is best practice and is expected to be incorporated in a future version of EN 301 549, so building to 2.2 now future-proofs your product.

Is this checklist a substitute for a full accessibility audit?

No. This is a readiness self-assessment that helps you gauge where you stand and prioritise. Legal conformance requires manual testing with assistive technologies, code-level review and a documented accessibility statement. UXellence provides full WCAG and EAA audits, remediation roadmaps and team training.

What happens if my product is not accessible?

Non-compliant products and services can face enforcement action by national market-surveillance authorities, including corrective orders, penalties and, in serious cases, restriction from the EU market — alongside the reputational and commercial cost of excluding users who cannot complete key tasks.

NEXT STEP

The EAA Exposure Report

Know exactly where you stand. A fixed-scope assessment of your top 10 screens against WCAG 2.2 and EN 301 549, mapped to the obligations the European Accessibility Act places on you.

- Ten screens, assessed in five working days.
- An automated pass plus a manual review of what tools cannot see.
- Every finding mapped to a WCAG 2.2 criterion and the EAA obligation it sits under.
- A prioritised, fix-this-first order, and a 30-minute walkthrough call.
- A findings report — not remediation.

€1,200

plus VAT where applicable. EU businesses with a valid VAT number are invoiced under reverse charge.

The full €1,200 is credited against a subsequent full audit, with no time limit.

Get it, or see the full detail:

uxellence.gr/ea-exposure-report →