

The Essential Guide to the European Accessibility Act

Everything your business needs to get ahead of the **June 28, 2025 deadline**.



Attention, all businesses operating in the European Union!

You have an important task ahead of you.

It's time to start making your digital assets (website, devices, and content) accessible, compliant, and usable by people with disabilities and meet the requirements of the European Accessibility Act.

Requirements for products and service providers will come into force on June 28, 2025. That may seem like a distant date. We know how busy you are, and you might be tempted to tackle all this digital

accessibility stuff later.

Don't make the mistake of skimming through this guide and postponing action for another time. Here's the reality: It's essential to start preparing now.

The road ahead may be challenging, with steep slopes, unforeseen obstacles, and challenging terrain. However, with the right mindset, tools, and guidance, you can conquer this path and achieve your goals.

Ready to embark on the journey towards achieving EAA compliance?

Lace-up your metaphorical hiking boots, brew a cup for the road, and let's get started!





The Trailhead

Digital Accessibility Foundational Knowledge

If you are not familiar with the digital accessibility terrain, fear not, we have some excellent resources to equip you and your team as you prepare for your journey with the EAA.



Accessibility Resources

- [Why Is Web Accessibility Important?](#)
- [Guide to Creating a Digital Accessibility Program](#)
- [Beginners Guide to Inclusive UX Design](#)
- [Web Accessibility Standards Primer](#)

Understanding The European Accessibility Act

The European Accessibility Act (EAA) requires specified digital products and services in the European Union to be usable by people with disabilities.

Building on earlier directives, the EAA aims to unify accessibility requirements across the EU, making accessibility initiatives less costly and promoting cross-border commerce.

People with disabilities in the 27 member states represent a purchasing power of \$2.3 trillion in the EU and \$13 trillion worldwide.

Before the EAA, businesses that traded across the EU faced different accessibility requirements at different levels, making it hard to comply with divergent rulesets. The differences in accessibility laws and policies between Member States and at regional levels caused market fragmentation. They drove up the cost of making goods and services accessible, unfortunately leading to a lack of awareness of the importance of people with disabilities as a consumer group.

The EAA addresses this problem by requiring member states to implement the EAA into their own legislation and regulations, providing a consistent set of baseline accessibility requirements

across Europe. The EAA provides flexibility for member states to interpret the requirements into national legislation and regulations, so it's possible that some member states may place additional requirements. Although the EAA's intention is to create a common baseline, it's worth reviewing the specific requirements of each member state's legislation, in case there are any additional requirements a product or service will need to meet for that state.



EAA Resources

- [EAA Resource Center](#)
- [Webinar: Learn more about the EAA](#)
- [EAA Kiosk Guide](#)



Your Next Stop:
The European Accessibility Act 101

— The European Accessibility Act —

What Does the EAA Cover?

The EAA covers commonly used hardware and software, and various services related to communication, commerce, finance, education, and transportation.

These include:

- Websites and mobile apps
- Computers and operating systems
- Smartphones and other equipment for accessing telecommunication services
- Self-service devices such as ATMs and ticketing machines
- E-books and e-readers
- E-commerce experiences
- Communication technology and equipment
- Banking services
- Passenger transport services
- Audiovisual media services, including broadcast and digital TV and related equipment
- Services that receive emergency calls to the single European number '112'

Understanding the EAA Requirements

The EAA doesn't provide specific technical standards for accessibility that digital products must meet. Instead, EAA compliance depends on organizations following other accessibility standards, in particular the European Standard EN 301 549 – Accessibility Requirements for ICT Products and Services. This standard provides general accessibility requirements to be met by all covered information and communication technologies, and specific requirements for hardware, software, and product documentation. EN 301 549 applies W3C Web Content Accessibility Guidelines (WCAG) 2.1 Level A and AA requirements to websites, digital documents and software, including mobile apps.

In support of the EAA, EN 301 549 is currently undergoing revision, and it's likely that a new version with additional requirements will be published in 2025. It's anticipated this will include adopting WCAG 2.2 Level A and AA requirements.

WCAG is a global standard and an established framework for assessing digital accessibility in the EU. The best way for organizations to prepare to meet EAA requirements is to take steps to ensure digital products conform to WCAG 2.2 Level A and Level AA requirements.

Overlays Are Not An Acceptable Option

You might have heard about or considered adopting accessibility overlays as a way to meet your accessibility requirements. Overlays perform, temporary real-time transformations to your website's appearance and functionality when a disabled person visits your site. Although overlays seem like an effective solution, they have many limitations. For one, overlays can't automatically detect or fix all possible accessibility issues on a web page. Some solutions have even been found to make websites less accessible to people using assistive technology.

For these reasons, the European Commission's Directorate-General for Communication does not endorse any overlay product or service.

"Claims that a website can be made fully compliant without manual intervention are not realistic, since no automated tool can cover all the WCAG 2.1 level A and AA criteria.

It is even less realistic to expect to detect automatically the additional EN 301 549 criteria."

– Commission.Europa.eu

Risk of Inaction

The EAA places responsibilities on member states to monitor products and services for compliance with EAA requirements, and to take action on organizations that provide inaccessible products and services. After the June 28, 2025 deadline, European countries can start levying fines and penalties which could include imprisonment for non-compliance.



WCAG Resources

- WCAG 2.2 Checklist
- New Advice on WCAG for Software and Documents: Part 1 and Part 2

With your focus set firmly on the June 28, 2025 deadline, let's chart a proactive path to reach this landmark.

Your EAA Trail Map

1 ASSESS

To design a path forward, you need to evaluate how well your existing digital assets support the needs of users with disabilities. Locating accessibility barriers that exist in your most critical user flows helps you prioritize efforts to remove barriers that have the most impact on people with disabilities.

Accessibility audits are key here, providing you with the information you need to understand accessibility issues that are present and move forward with accessibility remediation.

Additionally, identifying knowledge gaps on your team early on and planning role-based training can set your team up for success.

2 STRATEGIZE

Once you know where you stand, you can begin the process of remediation and incorporating accessibility into future efforts. After undergoing an audit, you can build a strategy around the findings. At this step, ask the following questions, and plan your strategy to answer them.

- How do we prioritize remediating barriers identified in the audit?
- How will we verify that remediation efforts have been successful?
- How can we bake accessibility into the process of building and maintaining our digital environment?
- Who will share the responsibility for accessibility throughout the organization?
- How do we ensure all stakeholders have the knowledge, skills, and tools to help them meet their accessibility responsibilities?
- What needs to happen to make accessibility part of organizational culture and practice?
- What tools do we need to manage our program efficiently?

3 PREPARE AND SUPPORT

After you have reviewed the accessibility capability of your teams and organization in Step 1, you should have a good sense of what is needed to prepare your team and implement your accessibility strategy. Accessibility is a team game, with responsibility spread across multiple roles – so ensuring that team members understand their accessibility responsibilities and have the knowledge, skills, and support needed to meet those responsibilities is critical for their success. Additionally, as your team gets further into the journey, and when new team members join, continue providing support as they encounter new challenges.

4 IMPLEMENT

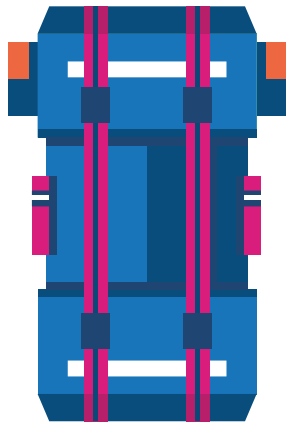
Empower your team with the tools and resources needed to remediate existing issues to bring each of your assets to compliance. Using accessibility testing software along with robust manual testing processes allows you to test and monitor your digital products. Additionally, make sure you include people with disabilities when evaluating the usability of your digital products. An important requirement of the EAA is documenting the progress of your accessibility efforts and producing an accessibility statement for each digital asset you provide to customers.

5 MONITOR AND GROW

Ensuring your digital spaces are accessible is an ongoing commitment. As regulations change, and as you make updates to existing digital properties and create new digital products, you should embed accessibility through all stages of the product development life cycle. Establish accessibility in product requirements right at the beginning; check visual designs for accessibility before they're implemented in code; and develop or acquire code libraries and frameworks that embed accessibility into reusable code to make it easier to build accessible products out-of-the-box. Continuously monitor your accessibility compliance with automated scanning.

Tools for Your Toolkit!

- [Single-Page Testing Tool – ARC Toolkit](#)
- [Screen Reader UX Testing – JAWS Inspect](#)
- [Color Testing Tool – Colour Contrast Analyser](#)
- [Accessibility Techniques – ARC KnowledgeBase](#)



Prepare Your Pack – EAA Checklist

A core principle in leading any successful journey is preparedness. While you can never completely avoid risk and unknown unknowns, investing time into preparing for any endeavor is critical to your success.

1 ASSESS

- ☐ Establish your conformance goal – WCAG 2.1 AA to meet current requirements or WCAG 2.2 AA to be more future-proof.
- ☐ Prioritize your digital assets in terms of importance to assess for potential accessibility issues.
- ☐ Conduct an accessibility scan of each digital asset to identify the level of conformance.
- ☐ Follow up with a manual assessment of each digital asset against your conformance standard.
- ☐ Assess your team’s accessibility awareness, knowledge, and skills.
- ☐ Start conversations with leadership and other stakeholders to make the case for investment in addressing accessibility issues and building an accessibility program.

2 STRATEGIZE

- ☐ Define and communicate a future state of digital accessibility that your organization will work towards and a high-level plan for achieving that future state.
- ☐ Communicate accessibility responsibilities to each stakeholder responsible for aspects of digital asset development and content creation.
- ☐ Create a plan for prioritizing and addressing barriers found in existing digital assets.
- ☐ Define accessibility requirements for building all new digital assets based on your chosen conformance standard.
- ☐ Define a strategy for involving people with disabilities in designing and testing digital assets.
- ☐ Define product accessibility documentation and reporting expectations.

3 PREPARE AND SUPPORT

- ☐ Provide role-based accessibility training to everyone involved in digital asset creation.
- ☐ Define accessibility tests to be conducted by team members involved in digital asset design, development, and testing.
- ☐ Identify and acquire tools that will help with meeting accessibility requirements during design, development, content creation, and testing.
- ☐ Establish a shared repository of accessibility knowledge that all team members can consult and contribute to.

4 IMPLEMENT

- ☐ Work through the process of remediating accessibility barriers in existing products.
- ☐ Address accessibility requirements as early as possible when creating new digital assets.
- ☐ Include people with disabilities in digital asset usability evaluation.
- ☐ Document progress towards addressing accessibility requirements, including producing an accessibility statement for each digital asset you provide to customers.

5 MONITOR AND GROW

- ☐ Track accessibility data for each digital asset and address areas where improvement is not happening at the desired rate.
- ☐ Review and address gaps in knowledge and tools available.
- ☐ Review, report, and celebrate successes!



Tip: Having a trusted guide like TPGi can help ensure your journey starts out on the right foot, is there to assist if you stray from the plan, provide guidance and training as your team enters uncharted terrain, and help mature your accessibility program as time goes on. [Learn more about TPGi as a Service \(TaaS\).](#)



You have to know where you are to get where you're going.

SURVEYING THE TERRAIN - AUDITS & REVIEWS

Audits investigate the accessibility attributes of your website or digital content, addressing your current conformance level with the Web Content Accessibility Guidelines (WCAG) and how to move forward.

The remaining paths to get closer to your destination are varied, with increasing levels of detail and complexity.

- **FULL DOMAIN AUTOMATED SCAN:** TPGi's full domain accessibility scan provides you with robust insights into the accessibility of your website and the knowledge needed to remediate. **Schedule a demo of ARC.**
- **COMPREHENSIVE AUDIT:** Engineers perform a manual review of the top user flows on your website(s) to identify potential barriers for people with disabilities. **Start your audit.**
- **UX DESIGN REVIEWS:** Shift-left and test for accessibility at the design stage of your software development life cycle. **Review your UX.**
- **AT USER FLOW TESTING:** Creating usable experiences for assistive technology users is critical for complying with the EAA. AT User Flow Testing is an affordable way to identify accessibility barriers and remain agile. **Learn more about AT User Flow Testing.**

Kick start your EAA journey – Schedule a consultation!



At last, our coveted destination is in sight:
Comply with the EAA before June 28, 2025.

The work is never done with accessibility. Take a breath, recognize your efforts, and commit to ongoing improvements in accessibility, while also baking it into your organization's culture and practice. Look for ways to make accessibility efforts more efficient and effective through a combination of automation, solid processes, greater knowledge and skills, and partnerships with disabled people. Treat accessibility as a way to innovate and enhance your digital assets. Keep monitoring standards and regulations for any new requirements you may need to meet.



Consider Providing a Voluntary Product Accessibility Template (VPAT) to Document Your Level of Conformance.

A VPAT provides a standard way to document a product's accessibility conformance with standards like WCAG and EN 301 549, two standards that will help you demonstrate conformance with EAA requirements to your customers and to regulators.

VPAT Resources

- [Learn more about VPATs or consult with a TPGi expert.](#)
- [Download TPGi's Guide to the VPAT.](#)

THE JOURNEY IS THE DESTINATION

After a challenging journey filled with various hurdles and significant accomplishments, the peak of digital accessibility is now within reach. It's a tangible reality. And you know what? The climb wasn't as steep as it first seemed.

Now that you've gained a clear understanding of what digital accessibility entails, its implications for your business, and how to achieve conformance, that looming deadline doesn't seem so formidable anymore.

This newfound panorama isn't just about the relief of being EAA compliant. It's about the powerful impact of doing the right thing, the resulting positive ripple effect on your brand image, customer loyalty, and the potential for boosted sales.

You can stop and reflect on the path you've navigated, appreciating how far you've come. As the fresh breeze carries the uplifting hum of inclusivity, you'll know you've opened doors wide for everyone to be welcomed.

Your Accessibility Partners

Remember: Accessibility is an ongoing process. Now that you're armed with the knowledge, the right tools, and an experienced partner by your side, you're ready to face any challenges that come your way.

And if you haven't yet taken the trek, now is the time. The trail is laid out before you, the map in your hands. The sooner you embark on this journey, the better your chances of savouring the sunset from the peak of EAA conformance, knowing you've genuinely championed digital inclusivity and all its benefits.

TPGi, a Vispero company, provides digital accessibility software and services to help businesses reduce risk, grow revenue, and improve user experience. With over 20 years of experience and employees that actively influence accessibility standards on the World Wide Web Consortium (W3C), TPGi offers the most robust KnowledgeBase and accessibility expertise in the industry.

TPGi as a Service (TaaS) offers an all-in-one solution for managing digital accessibility. We combine expert guidance, strategic planning, and advanced tools to help you achieve and maintain compliance, seamlessly aligning with your development cycles.



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