**EAA Q&A after webinar with Susanna Laurin, IAAP EU**

**Q1
How are services expected to demonstrate compliance? Are they expected to publish an accessibility statement (as with public sector)?**

A1
WAD and EAA are different legislations. In WAD, the accessibility statement is targeting both end users with disabilities (easy to understand information) and for the monitoring agency (technical conformance information). But in EAA, information to users and information to surveillance authorities are described separately and will in many cases be handled separately as well.

Service providers need to provide information and instructions in written and oral format, including in a manner which is accessible to persons with disabilities. In addition to that, they need to provide technical documentation (specific requirements are found in Article 5).

**Q2
What’s the major difference between EAA and WCAG? Where is the direct reference as knowledge of Body on EAA.**

A2
This is comparing apples with pears: EAA is a law. WCAG is a set of global guidelines. No EU-legislation will directly reference global guidelines, we need harmonised European standards for the presumed conformance of EU legislation. In the case of EAA, the standards are:
https://stiftelsenfunka.org/combining-perspectives/european-policy-legislation-and-standards/

**Q3
The roadmap for the harmonised requirements states that they won’t be published until 2026 - what will apply in the interim?**

[**https://portal.etsi.org/eWPM/index.html#/schedule?WKI\_ID=64282**](https://portal.etsi.org/eWPM/index.html#/schedule?WKI_ID=64282)

A3
The EAA contains the requirements and applies from 28 June 2025. All standards are voluntary.

**Q4
From a standards perspective (physical accessibility), we know that standards exist for "Design" and "Build" of (hotel, ship) real estate etc (Part M Building Regulations etc).....but what about "Operate" and including the dimension of time when measuring the ability to get from A to B in a place covered by equality legislation (ie cross the same physical distance in demonstrably the same amount of time, given everyone's different degrees of physical pace, mobility, ability and disability due to their natural individuality - ie addressing/tackling a 1st come, 1st served service model) ?**
A4
I don’t understand what the question is.

**Q5
There’s lot of references to 2025 being the deadline, but the act describes a transitional period until 2030 for existing products and services - could that be clarified?**
A5
28 June 2025 is when the directive applies to products placed on the market and services provided to consumers. Two grace periods are stated in the directive, and one is optional for Member States to decide:

* **Services that were using products** in scope of the directive before 28 June 2025, may continue to use these products until 28 June 2030.
* **Service contracts** signed before 28 June 2025 may continue until they expire, but no longer than 5 years.
* Member states can decide that **self-service terminals** in use before 28 June 2025 may continue to be used until the “end of their economically useful life”, but no longer than 20 years after they started to be used.

**Q6
Can you please share the reference link for EU(UK) present laws to refer? EN 301 549**

A6
There will be no UK transposition of the EAA as the UK is no longer part of the EU. But any economic operator that plans to sell products or services in scope of the directive to customers in the EU needs to comply – no matter where they are based.
[The European Accessibility Act](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L0882#d1e2628-70-1)

[EN301549 v3.2.1](https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf)

Please note that standards are being updated:
<https://stiftelsenfunka.org/combining-perspectives/european-policy-legislation-and-standards/>

**Q7
If you can recommend one thing to go and read to get good understanding of it, what would it be?**

A7
The European Disability Forum has created a toolkit for their members that is quite easy to digest:
<https://www.edf-feph.org/publications/eaa-toolkit/>

The European Commission has an overview that can serve as a short introduction:
<https://ec.europa.eu/social/main.jsp?catId=1202>

**Q8
What is the biggest disruption coming to Accessibility?**

A8
If that question is to be interpreted in connection with EAA, I would say that the mainstreaming approach is the most ambitious – and potentially disruptive – part of the directive. Making accessibility part of the CE-marking and general market surveillance aims at embedding accessibility in generic commercial design and development of products and services, rather than being a specific issue you deal with on the side (or may forget). If this proves to be successful, it would change the way accessibility is treated by the industry.

If the question is to be interpreted more broadly, I believe many people would say AI.

**Q9
For a web-based platform, does adhering to EN 301 549 v3.2.1 standards ensure I don't fall foul of EAA?**

A9
Almost – the EN301549 is currently being updated, so meeting the next version of the standard will – as soon as the standard is published in the Official Journal and thereby harmonised – act as presumed conformance to the directive. If the platform deals with e-books, emergency communication or support services, you may need to also look at the specific standards for these areas (see link in Q2 above).

**Q10
How will this be enforced, policed, and monitored, how is the EU going to raise awareness of accessibility. I was in France and Spain last week and very few people had any knowledge of accessibility, makes me think this is going to be a big hill to climb.**

A10
Enforcement and surveillance are done at member state level, by each sector in scope. The strength of the directive is that the requirements will become part of other sector-specific requirements, including control mechanisms already in place. Products that do not fulfil the requirements can be taken off market if they do not remediate within a reasonable time. That is quite a strong stick. Penalties will be decided at Member State-level. It may take time, but the directive will for sure make a difference in the end. My impression (not scientifically proven) is that commercial actors in scope of the EAA are generally much more aware than the public sector bodies were a year before WAD entered into force.

**Q11
Does anyone know of the will of the UK to meet the higher progressive legislative level of the EAA Act. I have heard from very reliable sources that the Civil Service want to push ahead with stronger/broader accessibility legislation, but as you know we have a terrible government and they appear to have no interest in progressing this.**

A11
I have no knowledge about this.

**Q12
Is there any more detail on how this will be 'policed'. Is it at country level or company level? As the directive gets off the ground and given how guidance such as WCAG is pretty impenetrable (!) how much support will be available to make the guidance more accessible and easy to understand in itself?**

A12
See A10 above. Economic operators need to provide information about accessibility as well as technical documentation. IAAP EU is working on an initiative to develop supporting documents for EN301549 requirements beyond WCAG. For WCAG, there are “understanding” and “how to meet” documentation.

**Q13
Has the Act been created or reviewed with survivors of tech abuse in mind who have** **accessibility needs? Happy to provide examples if useful later. Many products etc are not risk assessed with these users in mind.**

A13
The EU process of developing laws is quite complex and does involve many stakeholders. I know end user representatives have been regularly consulted with during the development of EAA. If you are interested in the law making process, the Council provides a good overview:
<https://www.consilium.europa.eu/en/council-eu/decision-making/ordinary-legislative-procedure/>

**Q14
How robust/fit for purpose is the complaints ethos of LkSG/ICCPR (Article 2.1) and other mHRDD mandatory reporting regimes across the UN where we know that the processing of (accessibility) complaints relies on a complaint actually being processed (!)...ie point of failure**

A14
I am not the right person to respond to this as it is not my area of expertise.

**Q15
If an organisation offers online support of a kind and people within the EU use this, does this mean the EAA covers that support even if from a UK organisation?**

A15
If the online support is for a product or service in scope of the EAA and offered to consumers in the EU, it doesn’t matter where the support organisation is based.

**Q16
Could you direct me to any sections of the EU legislation specifically on websites and digital services including eLearning.**

A16
EAA Annex 1, Section 3.
NB e-learning may also be covered by WAD, if it is provided by a body governed by public law.

**Q17
The current version of EN 301 549 v3.2.1 is 189 pages long (and the update which will be published in 2026 is still in development) - how will compliance practically be verified?**

A17
That is up to each surveillance authority to decide. But the presumed conformance will not be “the whole EN”, it will be relevant parts of the EN, just as the WAD compliance is based on the table in Annex A. Still long, but not 189 pages.

**Q18**

**Is there anywhere where UX/UI/product designers can get training on this? How can we check designs & annotate designs to ensure they're compliant. The helpful part of WCAG guidelines offers examples.**

A18
The Funka Foundation provides role-based training on EAA requirements, and I am sure many others do too. As mentioned in A12, IAAP EU is working on an initiative to develop supporting documents for EN301549 requirements beyond WCAG.

**Q19**

**How can I do user testing in Europe?**

A19

I do not think user testing in Europe differs from user testing elsewhere?

**OTHER USEFUL INFORMATION**

IAAP Membership Options: <https://www.accessibilityassociation.org/s/membership>

If anyone is not yet subscribed to the IAAP newsletter you can you can sign up here: <https://accessibilityassociation.us7.list-manage.com/subscribe?u=c9e95602d3d7209e71c920bfa&id=9ecc5848ae>

Your questions about the European Accessibility Act (EAA):

<https://abilitynet.org.uk/news-blogs/your-questions-about-european-accessibility-act-eaa>