

European Accessibility Act (EAA) Checklist

This checklist is your essential, actionable guide to ensure your digital presence—including websites, mobile apps, and all forms of media—meets the EAA's strict requirements. It's designed to help you methodically identify, implement, and maintain accessibility across your organization.

Go through each section and mark off each item as it's completed. Use it as a living document to track your progress toward full EAA compliance.

PHASE 1 Establish Foundational Understanding & Policy

Each European country has transposed the EAA extensively, in many cases mirroring the EAA guidelines.

The first step is to thoroughly understand the legal landscape and formalize your commitment to accessibility.

- ✓ Research and document how individual EU countries have transposed the EAA.
- ✓ Compile a detailed document for each country you serve, outlining the requirements for your services and products.
- ✓ Establish formal processes and documentation by creating a comprehensive accessibility policy.

PHASE 2

Auditing & Accessibility Gap Analysis

Once you have a clear understanding of the requirements and a policy in place, it's time to assess your current state and plan for improvements.

You can work with accessibility experts and testing tools.

- ✓ Evaluate your current products, websites, and mobile apps to identify if they comply with EN 301 549 and WCAG 2.1.
- ✓ Create a plan to address and prioritize any identified gaps.
- ✓ Provide role-specific training on accessibility guidelines and EAA requirements across your organization.
- ✓ Find or create resources like checklists and FAQs tailored to specific roles to ensure widespread adoption.

EAA vs. EAA Transpositions

Directive (EU) 2019/882 (European Parliament and Council): a *Union legal act* that sets out general principles and requirements. It mandates Member States to transpose its provisions into their national law.

EAA Transposition: a *national law* that implements the European Directive into the country's legal framework. It directly creates legal obligations and designates national authorities.

PHASE 3

Monitoring & User Feedback

Accessibility is an ongoing commitment. This final phase focuses on maintaining compliance and responding to user needs.

You can use automated tools to regularly scan and identify EAA violations.

- ✓ Implement a system for continuous monitoring and testing of your digital products and services.
- ✓ Implement a user feedback system to address any accessibility concerns directly from your users.
- ✓ Appoint a dedicated team to oversee EAA compliance and respond to user feedback promptly.

Accessibility is not a one-time fix but a continuous and evolving commitment.

Services & Products Checklist

This section provides a detailed checklist for businesses to ensure their digital products and services comply with the European Accessibility Act (EAA), categorized by content type, including digital content, mobile apps, audiovisual media, e-commerce, customer support, documentation, and hardware/software.

This resource is critical for anyone involved in creating, managing, or overseeing digital content and services, including IT and Development teams, Marketing, Legal, Product Owners, Content Creators, and dedicated Accessibility Teams.

Digital Content and Websites

- ✓ Ensure all website content meets a minimum WCAG 2.1 AA, the baseline standard under EN 301 549.
- ✓ Structure pages using semantic HTML and headings that support screen reader navigation.
- ✓ Ensure all functionality is accessible via keyboard, including menus, buttons, and forms.
- ✓ Provide text alternatives for images, icons, and other non-text content.
- ✓ Announce error messages clearly and associate them with input fields programmatically.
- ✓ Design responsive layouts that work across devices and zoom settings.
- ✓ Test websites with assistive technologies to identify genuine usability barriers.
- ✓ Recheck accessibility when content, design, or code is updated.

EN 301 549 is based on WCAG 2.1 Level AA and provides the technical specifications for businesses.

Mobile Applications

- ✓ Design mobile apps to meet at least WCAG 2.1 AA, as required under EN 301 549 for software and apps.
- ✓ Label controls and input fields so screen readers like TalkBack and VoiceOver can interpret them.
- ✓ Ensure the focus order is logical, and interactive elements provide visible focus indicators.
- ✓ Provide alternatives for complex gestures (e.g., multi-finger swipes or shaking).
- ✓ Maintain color contrast and allow users to resize text without losing content or functionality.

- ✓ Announce updates (such as error alerts or status messages) so that all users can perceive them.
- ✓ Test apps manually with screen readers and assistive input methods on both iOS and Android.
- ✓ Revalidate accessibility whenever features, flows, or frameworks change.

Audiovisual Content

- ✓ Provide captions for video.
- ✓ Include audio description.
- ✓ Ensure full and quality transmission of accessibility components (subtitles, audio description, sign language) synchronized with sound/video, allowing user control.
- ✓ Provide accessible electronic program guides (EPGs) that include info on accessibility features.

Audiovisual Media Definition

[Article 1\(1\)\(a\) of Directive 2010/13/EU](#) and [Article 2 of Directive 2002/21/EC](#) defines audiovisual media service:

- Is managed by a media provider (they're responsible for the content).
- Mainly provides programs (like TV shows or movies).
- Aims to inform, entertain, or educate the general public.
- Is delivered through "electronic communication networks" (this includes things like:
 - Satellite, internet, and mobile networks.
 - Wired connections, radio, and optical cables.
 - Networks used for radio and TV broadcasting, and cable TV).
- Can be either a traditional **television broadcast** (scheduled) or an **on-demand** service (you watch when you want).

E-Commerce Interfaces

- ✓ Ensure online shopping and service transactions are fully accessible.
- ✓ Provide product and service descriptions that are readable by assistive technologies.
- ✓ Ensure that shopping carts, checkout forms, and payment flows are keyboard-accessible and screen reader-compatible.
- ✓ Use authentication and ID verification methods that do not rely on visual-only CAPTCHAs.
- ✓ Make dynamic updates—such as price changes or stock notices—programmatically determinable.
- ✓ Present confirmation pages and digital receipts in a perceivable, operable, and understandable format.
- ✓ Use automated tools to identify common issues, but supplement with manual and assistive technology testing to ensure accessibility.

Communication and Customer Support

- ✓ Ensure everyone can get help and communicate effectively.
- ✓ Offer multiple accessible contact options, including real-time text (RTT), voice, and video where required.
- ✓ Ensure customer-facing support tools, such as live chat, help desks, and contact forms, work with screen readers and keyboard navigation.
- ✓ Provide support documentation in accessible digital formats describing available accessibility features.
- ✓ Train support staff to assist customers who use assistive technologies.
- ✓ Maintain compatibility with relay services and alternative communication tools.
- ✓ These requirements apply to consumer-facing services; separate national laws may cover internal systems.

Documentation and Product Information

- ✓ Deliver product instructions and content in accessible formats.
- ✓ Provide manuals and user guides in tagged PDF, HTML, or other screen-reader-friendly formats.
- ✓ Use clear structure, headings, and plain language to help users navigate and understand documentation.
- ✓ Offer materials in multiple sensory formats when feasible, such as text, audio, or visual alternatives.
- ✓ Ensure that packaging and product information are accessible to assistive technologies where required.
- ✓ Include compatibility details for supported browsers, screen readers, or file types.
- ✓ Guidance applies to consumer-facing materials related to products and services covered by the EAA.

Hardware/Software Products

- ✓ Design inclusive interfaces and support a range of assistive technologies.
- ✓ Support alternative inputs such as text-to-speech, Braille displays, and tactile feedback.
- ✓ Provide volume control and adjustable speech output for audio interfaces.
- ✓ Avoid relying on visual or audio cues alone; supply equivalent text or haptic feedback.
- ✓ Ensure the software is compatible with screen readers, keyboard navigation, and other assistive technologies.
- ✓ Allow users to adjust contrast, scale text, and disable flashing content.
- ✓ Validate digital interfaces with assistive technology users to identify usability barriers beyond technical conformance.

Why UsableNet & 3Play Media

UsableNet brings deep expertise in web and mobile accessibility, WCAG/EN 301 549 compliance, and ongoing accessibility testing.

[Contact Us](#)

3Play Media is a leading expert in creating inclusive video content. We provide services such as captioning, audio description, subtitling, and dubbing in a wide array of global languages.

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