

The EAA in Plain English: Articles

This outline makes understanding the EAA easier by simplifying many of the important sections into plain English. For full details, reference the [European Accessibility Act](#).

This outline spans the Articles of the EAA. There is a separate outline for the Annexes.

[Accessible.org/eea](#) has more EAA resources.

[Accessible.org](#) offers audits, VPATs, and more.

[Accessibility Tracker](#) makes managing your project much easier.

©2025 Accessible.org, LLC and Kris Rivenburgh

EAA Guide

1. Define your role.
 - a. Manufacturer
 - b. Service Provider
 - c. Importer
 - d. Distributor
2. Think of obligations as administrative work.
3. Think of requirements as technical accessibility work.

Contents

The EAA in Plain English	1
EAA Guide	1
Contents	2
Article 2: Scope	3
Article 3: Definitions	5
Article 7: Obligations of Manufacturers	8
Quick Checklist	8
Plain English (Expanded)	8
Article 9: Obligations of Importers	10
Quick Checklist	10
Plain English (Expanded)	10
Article 10: Obligations of Distributors	12
Quick Checklist	12
Plain English (Expanded)	12
Article 11: When Manufacturer Obligations Apply to Importers and Distributors	14
Article 13: Obligations of Service Providers	15
Quick Checklist	15
Plain English (Expanded)	15
Article 14: Fundamental Alteration and Disproportionate Burden	17
Quick Checklist	17
Plain English (Expanded)	17
Article 18: Rules and Conditions for Affixing the CE Marking	19
Quick Checklist	19
Plain English (Expanded)	19
EAA Resources	21

Article 2: Scope

The EAA applies to:

1. Products

- a. Regular computers and the software that runs them: like desktop PCs, laptops, and the Windows, Mac, or Linux operating systems that make those computers work
- b. The following self-service terminals:
 - i. Payment terminals: Card readers and payment machines (like the ones you swipe or tap your card on at stores)
 - ii. Self-service machines that provide specific services:
 1. ATMs where you withdraw cash
 2. Ticket machines where you buy train, bus, or event tickets
 3. Check-in machines like airport or hotel self-check-in kiosks
 4. Information kiosks like touch-screen machines that give you information such as mall directories or tourist information stands (but not ones built into cars, planes, ships, or trains)
- c. Devices you use to communicate electronically like smartphones, tablets, computers, or smart TVs when you're using them to make calls, send messages, video chat, or use internet services
- d. Devices you use to watch or listen to media like smart TVs, streaming devices (Roku, Apple TV), tablets, or phones when you're using them to watch Netflix, YouTube, listen to music, etc.
- e. E-readers like Kindle, Nook, and similar devices for reading digital books

2. Services

- a. Electronic communications services (except machine-to-machine): Phone calls, text messages, internet service, email, video calls, messaging apps - any service that lets people communicate electronically.
- b. Services that give you access to TV and video content: Cable TV, streaming services (Netflix, Hulu), video-on-demand, internet TV services, or any service that lets you watch shows, movies, or other video content.
- c. Passenger transportation services: Airlines, buses, trains, and boats/ferries that carry passengers (but for city/local transport, only the terminals mentioned in point (v) apply):

- i. Websites: The transportation company's website where you book tickets or get info
 - ii. Mobile apps and services: Phone apps for booking, checking schedules, mobile tickets, etc.
 - iii. Electronic tickets: Digital tickets and the systems that create/manage them (like e-tickets you get on your phone)
 - iv. Travel information services: Real-time updates about delays, gate changes, arrival times, etc. For information screens, this only covers interactive screens in EU countries
 - v. Self-service terminals: Ticket machines, check-in kiosks, information terminals in EU airports, train stations, etc. (but not the ones built into the actual planes, trains, buses, or ships)
- d. Consumer banking services: Online banking, mobile banking apps, ATM services, credit card services - basically any banking service that regular people (not businesses) use
- e. E-books and dedicated software: Digital books you buy or download, plus the apps/programs specifically made for reading them (like Kindle app, Adobe Digital Editions, etc.)
- f. E-commerce services: Online shopping websites and apps where you buy things (like Amazon, Shopify stores, etc.)
- 1. The EAA doesn't apply to these things on websites and apps:
 - a. Old videos and audio: Any videos, podcasts, or audio content that was recorded and published before June 28, 2025
 - b. Old office documents: Word docs, PDFs, PowerPoint files, etc. that were published before June 28, 2025
 - c. Online maps like Google Maps, Apple Maps, etc., so long as the important navigation info is provided in an accessible way for people who need it
 - d. Third-party content: Content that isn't paid for or made by the party concerned; content someone else is in control of
 - e. Archive websites: Websites or apps that are basically digital museums as in they only show old content and never add or change anything after June 28, 2025

Article 3: Definitions

Here are many of the EEA legal definitions in plain English:

(2) '**product**' means anything that's manufactured - like electronics, clothing, furniture, or chemicals - but not food, animal feed, living plants and animals, things from humans (like blood or organs), or things from plants and animals that relate to breeding or reproduction;

(3) '**service**' means any independent economic activity that's normally done for payment, as defined in EU law about services in the internal market;

(4) '**service provider**' means any person or company (from an EU country) who offers or provides services to consumers in the EU;

(5) '**audiovisual media services**' means services like TV channels or streaming platforms that provide programs to the general public to inform, entertain or educate people, transmitted through electronic networks. This includes both traditional TV broadcasts and on-demand services (like Netflix) where you choose what to watch and when;

(6) '**services providing access to audiovisual media services**' means services that help you find, select, and watch TV shows and movies, along with accessibility features like subtitles for deaf people, audio descriptions for blind people, and sign language interpretation. This includes electronic program guides (like TV listings);

(7) '**consumer terminal equipment with interactive computing capability, used for accessing audiovisual media services**' means any device whose main purpose is to let you watch TV shows, movies, or other video content - like smart TVs, streaming boxes, or tablets used primarily for watching videos;

(8) '**electronic communications service**' means a service normally provided for payment through electronic networks, which includes: internet access services, interpersonal communication services (like phone calls, messaging, or video calls), and transmission services (like broadcasting signals). This does not include services that create or control the actual content being transmitted.

(17) '**manufacturer**' means any person or company who makes a product or has someone else make it for them, and sells it under their own name or brand;

(18) '**authorised representative**' means any person or company based in the EU who has been given written permission by a manufacturer to act for them on specific tasks;

(19) '**importer**' means any person or company based in the EU who brings a product from outside the EU into the EU market;

(20) '**distributor**' means any person or company in the supply chain (except the manufacturer or importer) who makes a product available for sale;

(21) '**economic operator**' means any of the following: the manufacturer, the authorised representative, the importer, the distributor, or the service provider;

(22) '**consumer**' means any individual person who buys a product or receives a service for personal use (not for their business or professional work);

(23) '**microenterprise**' means a very small business with fewer than 10 employees and annual revenue of no more than €2 million or assets worth no more than €2 million;

(24) '**small and medium-sized enterprises**' or 'SMEs' means businesses with fewer than 250 employees and annual revenue of no more than €50 million or assets worth no more than €43 million, but this doesn't include microenterprises.

(29) '**payment terminal**' means a device whose main purpose is to allow people to make payments using payment cards, mobile payments, or other payment methods at a physical store or location (but not for online shopping);

(30) '**e-commerce services**' means online shopping services provided through websites and mobile apps where a consumer can request and buy things electronically from a distance.

(37) '**assistive technology**' means any device, equipment, service, or software that helps people with disabilities do things better, maintain their abilities, or work around their limitations - like screen readers, hearing aids, or mobility aids;

(38) '**operating system**' means the main software that runs a computer and manages everything - like connecting to printers, running programs, storing files, and showing you the desktop interface. This includes systems like Windows, macOS, Android, or iOS, but doesn't include the basic startup software that boots up the computer;

(39) '**consumer general purpose computer hardware system**' means complete computer systems that regular people use for everyday computing tasks like personal computers, laptops, smartphones, and tablets;

(40) '**interactive computing capability**' means the ability for people to interact with devices by processing and sending data, voice, video, or any combination of these;

(41) '**e-book and dedicated software**' means digital book services that provide electronic book files you can read, along with the apps or software specifically designed for reading those digital books (but not including e-reader devices themselves);

(42) '**e-reader**' means a dedicated device (both the hardware and software) specifically designed for reading digital books - like a Kindle or similar device;

(43) '**electronic tickets**' means any system where your travel tickets, passes, or travel credits are stored electronically on a card or device instead of being printed on paper;

(44) '**electronic ticketing services**' means systems where you buy transport tickets online using a computer or mobile device, and the tickets are delivered electronically so you can either print them or show them on your phone when traveling.

Article 7: Obligations of Manufacturers

Quick Checklist

1. Design for accessibility: Ensure products meet accessibility requirements
2. Complete documentation & CE marking: Create technical docs, do conformity assessment, get CE mark
3. Keep records for 5 years: Store technical documentation and EU declaration
4. Maintain quality control: Have procedures to ensure ongoing compliance in production
5. Add product identification: Include model/serial numbers on product or packaging
6. Add manufacturer details: Include name and contact address in local language
7. Provide clear instructions: Include safety info and instructions in local language
8. Resolve non-compliance: Take immediate action if problems found, notify authorities, keep records
9. Cooperate with authorities: Provide documentation and assistance when requested

Plain English (Expanded)

1. When manufacturers put their products on the market, they must make sure the products are designed and made to meet the accessibility requirements in this law.
2. Manufacturers must create technical documentation following the rules in Annex IV and complete (or have someone else complete) the required conformity assessment process. If this process shows the product meets the accessibility requirements, manufacturers must create an EU declaration of conformity and put the CE marking on the product.

Important: The technical documentation must explicitly detail how each accessibility requirement is addressed and document any claimed exemptions.

3. Manufacturers must keep the technical documentation and EU declaration of conformity for five years after they first sell the product.

4. Manufacturers must have procedures in place to ensure that when they produce multiple units of a product, all of them continue to meet the requirements of this law. They must properly account for any changes to the product design, features, or relevant standards that could affect compliance.
5. Manufacturers must ensure their products have some form of identification - like a model number, batch number, serial number, or other identifying information. If the product is too small or it's not practical to put this information on the product itself, then this information must be on the packaging or in a document that comes with the product.
6. Manufacturers must put their name, business name or trademark, and contact address on the product. If that's not possible due to the product's size or nature, this information must be on the packaging or in a document that comes with the product. The address must be a single location where the manufacturer can be reached. The contact information must be in a language that end-users and government inspectors can easily understand.
7. Manufacturers must provide instructions and safety information with the product in a language that consumers and other users can easily understand (as decided by each EU country). These instructions, information, and any labels must be clear, understandable, and easy to read.
8. If manufacturers think or discover that a product they've sold doesn't meet the requirements of this law, they must immediately take action to fix the problem or remove the product from the market. If the product doesn't meet accessibility requirements, manufacturers must immediately tell the relevant government authorities in the countries where they sold the product, providing details about what's wrong and what they're doing to fix it. In these cases, manufacturers must keep records of non-compliant products and any complaints received.
9. When a government authority makes a reasonable request, manufacturers must provide all the information and documentation needed to prove their product meets the requirements, in a language the authority can easily understand. Manufacturers must cooperate with the authority on any actions needed to fix non-compliance issues with products they've sold, particularly to bring the products into compliance with accessibility requirements.

Article 9: Obligations of Importers

Quick Checklist

1. Only import compliant products: Place only products that meet accessibility requirements on the market
2. Verify manufacturer compliance: Ensure conformity assessment was done, technical docs exist, CE marking is present, and required documents are included
3. Address non-compliant products: Don't sell products that don't meet requirements; inform manufacturer and authorities if issues found
4. Add importer details: Include name and contact address on product or packaging in local language
5. Ensure proper instructions: Make sure safety info and instructions are provided in local language
6. Protect during storage/transport: Ensure storage and transport don't damage compliance
7. Keep records for 5 years: Store EU declaration and make technical docs available to authorities
8. Handle post-market non-compliance: Take immediate action if problems found, notify authorities, keep records
9. Cooperate with authorities: Provide info and assistance when requested

Plain English (Expanded)

1. Importers shall only place products on the market that comply with the accessibility requirements.

2. Before placing a product on the market, importers must make sure that the manufacturer has completed the conformity assessment procedure described in Annex IV. They must ensure that the manufacturer has created the required technical documentation, that the product has the CE marking and comes with the required documents, and that the manufacturer has followed the requirements in Article 7(5) and (6).

3. If an importer thinks or has reason to believe that a product doesn't meet the accessibility requirements of this law, the importer must not sell the product until it has been brought into compliance. Additionally, if the product doesn't meet the accessibility requirements, the importer must inform the manufacturer and the market surveillance authorities.

4. Importers must put their name, business name or trademark, and contact address on the product. If that's not possible due to the product's size or nature, this information must be on the packaging or in a document that comes with the product. The contact information must be in a language that end-users and government inspectors can easily understand.

5. Importers must ensure that the product comes with instructions and safety information in a language that consumers and other users can easily understand (as decided by each EU country).

6. Importers must ensure that storage and transport conditions while the product is under their responsibility don't damage the product's compliance with accessibility requirements.

7. Importers must keep a copy of the EU declaration of conformity available for market surveillance authorities for five years and ensure that technical documentation can be provided to those authorities when requested.

8. If importers think or discover that a product they've placed on the market doesn't meet the requirements of this law, they must immediately take action to fix the problem or remove the product from the market. If the product doesn't meet accessibility requirements, importers must immediately tell the relevant government authorities in the countries where they made the product available, providing details about what's wrong

and what they're doing to fix it. In these cases, importers must keep records of non-compliant products and any complaints received.

9. When a government authority makes a reasonable request, importers must provide all the information and documentation needed to prove the product meets the requirements, in a language the authority can easily understand. Importers must cooperate with the authority on any actions needed to fix non-compliance issues with products they've placed on the market.

Article 10: Obligations of Distributors

Quick Checklist

1. Act with due care: Follow the requirements of this law when making products available
2. Verify compliance before selling: Check CE marking, required documents, instructions in local language, and manufacturer/importer compliance
3. Handle non-compliant products: Don't sell products that don't meet requirements; inform manufacturer/importer and authorities if issues found
4. Protect during storage/transport: Ensure storage and transport don't damage compliance
5. Handle post-market non-compliance: Ensure corrective actions are taken if problems found, notify authorities immediately
6. Cooperate with authorities: Provide info and assistance when requested

Plain English (Expanded)

1. When making a product available on the market, distributors must act with appropriate care regarding the requirements of this law.
2. Before making a product available on the market, distributors must check that the product has the CE marking, comes with the required documents and instructions/safety

information in a language that consumers and other users in that EU country can easily understand, and that the manufacturer and importer have followed the requirements in Article 7(5) and (6) and Article 9(4) respectively.

3. If a distributor thinks or has reason to believe that a product doesn't meet the accessibility requirements of this law, the distributor must not make the product available on the market until it has been brought into compliance. Additionally, if the product doesn't meet the accessibility requirements, the distributor must inform the manufacturer or importer and the market surveillance authorities.

4. Distributors must ensure that storage and transport conditions while the product is under their responsibility don't damage the product's compliance with accessibility requirements.

5. Distributors who think or discover that a product they've made available on the market doesn't meet the requirements of this law must ensure that the necessary corrective actions are taken to fix the problem or, if appropriate, to withdraw the product. Additionally, if the product doesn't meet accessibility requirements, distributors must immediately tell the relevant government authorities in the countries where they made the product available, providing details about what's wrong and what corrective actions were taken.

6. When a government authority makes a reasonable request, distributors must provide all the information and documentation needed to prove the product meets the requirements. Distributors must cooperate with the authority on any actions needed to fix non-compliance issues with products they've made available on the market.

Article 11: When Manufacturer Obligations Apply to Importers and Distributors

An importer or distributor will be treated as a manufacturer under this law and must follow all the manufacturer requirements in Article 7 if they:

- Sell a product under their own name or trademark, or
- Modify a product that's already on the market in a way that could affect whether it meets the accessibility requirements of this law.

Article 13: Obligations of Service Providers

Quick Checklist

1. Design accessible services: Ensure services meet accessibility requirements
2. Prepare and publish accessibility information: Create required info per Annex V, make available in written/oral formats accessible to people with disabilities, keep updated
3. Maintain ongoing compliance: Have procedures to ensure continued compliance when service changes or requirements change
4. Handle non-compliance: Take corrective action if problems found, notify authorities immediately
5. Cooperate with authorities: Provide info and assistance when requested

Plain English (Expanded)

1. Service providers must design and provide services that meet the accessibility requirements of this law.
2. Service providers must prepare the necessary information following Annex V and explain how their services meet the accessibility requirements. This information must be made available to the public in both written and spoken formats, including in ways that are accessible to people with disabilities. Service providers must keep this information for as long as the service operates.

Important: This obligation can be satisfied by adding the information to an accessibility statement.

3. Without prejudice to Article 32, service providers must have procedures in place to ensure that their services continue to meet the accessibility requirements. Service

providers must properly account for changes in how the service is provided, changes in accessibility requirements, and changes in relevant standards or technical specifications that the service uses to meet accessibility requirements.

4. If services don't comply, service providers must take the corrective actions necessary to bring the service into compliance with accessibility requirements. Additionally, if the service doesn't meet accessibility requirements, service providers must immediately tell the relevant government authorities in the countries where the service is provided, giving details about what's wrong and what corrective actions were taken.

5. When a government authority makes a reasonable request, service providers must provide all information needed to prove the service meets the accessibility requirements. Service providers must cooperate with the authority on any actions needed to bring the service into compliance with those requirements.

Article 14: Fundamental Alteration and Disproportionate Burden

Quick Checklist

1. Check if exemptions apply: Accessibility requirements only apply if compliance doesn't fundamentally alter the product/service and doesn't create disproportionate burden
2. Conduct burden assessment: Assess whether compliance would cause fundamental alteration or disproportionate burden using Annex VI criteria
3. Document assessment: Keep assessment results for 5 years and provide to authorities when requested (microenterprises exempt from documentation)
4. Reassess service burdens regularly: Service providers must reassess disproportionate burden when service changes, when requested by authorities, or at least every 5 years
5. No exemption if funded for accessibility: Cannot claim disproportionate burden if receiving funding specifically for accessibility improvements
6. Notify authorities of exemptions: Inform relevant authorities when relying on exemptions for specific products/services (microenterprises exempt)

Plain English (Expanded)

1. The accessibility requirements in Article 4 only apply when compliance:
 - (a) doesn't require a major change to a product or service that would fundamentally alter what it basically is; and
 - (b) doesn't create an unreasonably heavy burden on the businesses involved.

2. Businesses must assess whether following the accessibility requirements in Article 4 would fundamentally change their product/service or create an unreasonably heavy burden, using the criteria in Annex VI.

Important: If businesses claim an exemption due to disproportionate burden, they must still implement accessibility to the maximum extent possible without reaching the burden threshold. The assessment isn't a simple yes/no decision — businesses must find the optimal level of accessibility within reasonable limits. For example, if making all self-service terminals accessible would be disproportionate, the business must still determine how many terminals they can make accessible or what level of accessibility features they can implement without creating a disproportionate burden.

3. Businesses must document this assessment and keep all relevant results for five years from when they last sold a product or provided a service. When market surveillance authorities or service compliance authorities request it, businesses must provide them with a copy of the assessment.

4. Very small businesses (microenterprises) dealing with products don't have to document their assessment. However, if a market surveillance authority asks, microenterprises that have chosen to rely on paragraph 1 must provide the authority with the facts relevant to their assessment.

Important: Microenterprises that manufacture products still must meet accessibility requirements but have reduced documentation obligations.

5. Service providers claiming the burden is unreasonably heavy must reassess whether the burden is disproportionate for each category or type of service:

(a) when the service is changed; or

(b) when requested by service compliance authorities; and

(c) at least every five years regardless.

6. If businesses receive funding from other sources (public or private) specifically to improve accessibility, they cannot claim the burden is unreasonably heavy.

7. The Commission can adopt additional rules to further specify the criteria that businesses must consider when doing their assessment. The Commission must consider benefits not only for people with disabilities, but also for people with functional limitations. If necessary, the Commission must adopt the first such rule by 28 June 2020, which will start applying at the earliest on 28 June 2025.

8. When businesses rely on paragraph 1 for a specific product or service, they must inform the relevant market surveillance authorities or service compliance authorities in the country where the product is sold or service is provided. This doesn't apply to very small businesses (microenterprises).

Article 18: Rules and Conditions for Affixing the CE Marking

Quick Checklist

1. Apply CE marking correctly: Place visibly, legibly, and permanently on product or data plate; if not possible, place on packaging and documents
2. Apply before market placement: Attach CE marking before selling the product
3. Ensure proper compliance: Follow existing mechanisms and take action against improper use

Plain English (Expanded)

1. The CE marking must be placed on the product or its data plate in a way that is visible, readable, and permanent. If that's not possible or appropriate due to the nature of the product, it must be placed on the packaging and in the accompanying documents.
2. The CE marking must be attached before the product is sold on the market.

3. EU member states must build upon existing enforcement mechanisms to ensure the CE marking rules are followed correctly and must take appropriate action when the marking is used improperly.

EAA Resources

Visit [Accessible.org/eea](https://accessible.org/eea) to download more resources to help with EAA compliance, including our EAA annexes outline.

Watch our EAA YouTube channel [@europeanaccessibilityact](https://www.youtube.com/@europeanaccessibilityact).