

The Ultimate Guide to the European Accessibility Act for E-commerce Businesses

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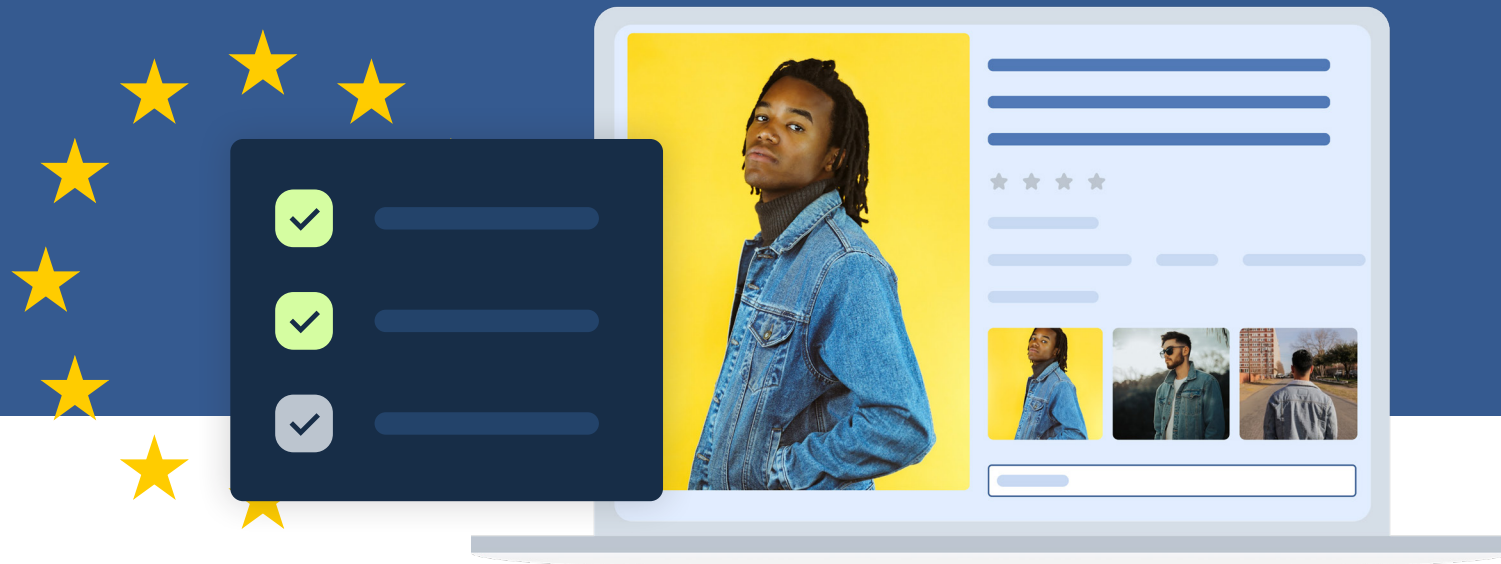
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The European Accessibility Act (EAA): Background

It was over a decade ago that the EU began exploring ways to make digital products and services more accessible to people with disabilities. At the time, accessibility standards varied widely across member states, creating barriers for users and inconsistencies for developers. Essential services like healthcare, education, and government support were challenging, and, in some cases, impossible for people with impairments to access digitally.





When the Web Accessibility Directive (WAD) was finally adopted in 2016, it provided a framework for standardizing accessibility practices in the public sector. It required public organizations to:

- Conform to the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA, which states that content must follow four guiding principles: It must be perceivable, operable, understandable, and robust.
- Publish a statement that detailed the strengths and limitations of their accessibility initiative.
- Create a system for collecting user feedback on accessibility issues and alternatives.

- Ensure that digital content including text, images, videos, and documents, were compatible with assistive technologies like screen readers.

Today, the European Accessibility Act (EAA) broadens the scope of this initiative to include private organizations as well as public organizations who operate within the EU. It also expands on the current requirements for creating a more inclusive digital experience.

Like EU member states prior to the WAD, each has its own unique set of accessibility standards it imposes on goods and services sold by private organizations. And like the public sector, the private sector has faced developmental

challenges, lagging implementation, and increased costs when attempting to adhere to multiple national regulations. The effect on people with disabilities is an inconsistent, and often insufficient, user experience across the EU.

With unifying standards for accessibility, the EAA aims to optimize the digital experience for all EU users with disabilities. Each member country is required to make these standards national law and begin enforcing the majority of its provisions by June 28, 2025.

EAA Key Objectives

It's a common misconception that the EAA focuses on private organizations while the WAD focuses on public organizations. Instead, the EAA is aimed at making certain products and services across the EU accessible to people with disabilities — regardless of whether those products or services come from public or private organizations. Its key objectives include:

- **Removing market barriers through standardization of accessibility practices.** For companies that operate across the EU, varying accessibility standards to meet each member state's criteria can make development challenging, production costly, and implementation risky. One misstep and you could find yourself facing large fines and legal action.
- **Stimulating innovation and employment in the EU economy.** The EAA creates a market for products and services that place accessibility at their core. As the EU strives to create a more inclusive digital landscape, services that help existing businesses achieve and maintain compliance, as well as businesses that build accessibility into the heart of their product, will find an abundance of opportunities in the European marketplace.

- **Improving access to products and services for people with disabilities.** Products and services deemed most valuable to people with disabilities are targeted as necessary for accessibility optimization. For some products and services, harmonized standards already exist. Where this is the case, they will be presumed to be in compliance with the accessibility requirements of the EAA. For example, ICT products and services must already comply with EU harmonized standard EN 301 549.¹ This standard is currently being revised to ensure it is aligned with the requirements of the EAA. This existing standard includes but is not limited to the four guiding principles from WCAG: ICT products and services must be perceivable, operable, understandable, and robust. Together with the EAA's new accessibility requirements, these standards will help create a more inclusive EU, where products necessary for daily life are more accessible for people with disabilities.
- **Facilitating cross-border trade.** Varying accessibility laws make cross-border trade highly difficult. With unified standards for compliance, companies will face a reduced compliance burden when buying and selling products or providing services within the EU or to EU consumers.



1. https://etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf

EAA Scope

To lay a foundation of accessibility compliance, it's important to understand just who and what the EAA impacts. The legislation is aimed at improving products and services that most impact people with disabilities. These are products like computers, ATMs, smartphones, e-commerce websites, and audio/visual equipment. As for whom the legislation applies to, these are enterprises responsible for providing a wide range of products and services to large customer bases within the EU.

What:

Certain products placed on the internal market after June 28, 2025, including:

- Computers and operating systems for consumers
- ATMs, ticketing and check-in machines, and certain interactive self-service terminals providing information
- Smartphones, desktops, notebooks, and tablets
- Equipment used to access digital television services
- Equipment used to access electronic communication services, including routers and modems
- E-readers

Specialized computers embedded in consumer electronics products do not constitute consumer general purpose computer hardware systems and are not in scope of the EAA.

Certain services provided to EU consumers after June 28, 2025:

- Telephone services
- Access to audio-visual media services such as television broadcast
- Certain services related to air, bus, rail, and waterborne passenger transport
- Consumer banking services
- E-books and dedicated software
- E-commerce services
- Emergency communications to the single European emergency number "112"

Who:

- For in-scope products: all entities in the supply chain (e.g., manufacturer and its representatives, importer, distributor)
- For in-scope services: all providers
- Except for microenterprises (businesses with fewer than 10 employees and a turnover/balance sheet under €2M) providing services, who may be exempted

Also in scope are service providers that provide in-scope services in the EU, and product manufacturers or distributors that manufacture or distribute in-scope products in the EU, even if they are headquartered outside of it.



Addressing Accessibility

No matter how your business views enhancing accessibility — as a moral obligation, a customer acquisition strategy, a UX improvement, or a legal requirement — it's a necessary step in today's digital-first economy.






A large number of people face challenges when using the latest digital products and services. These challenges can be:

- **Permanent.** Hereditary visual impairments.
- **Temporary.** Light sensitivity due to post-concussion syndrome.
- **Situational.** Hearing difficulties due to a loud environment.

Prioritizing accessibility is about understanding this range and creating an inclusive experience for your customers no matter where they fall on it. That said, complying with accessibility standards doesn't have to – and shouldn't – be cause for distress.

Many accessibility requirements are already linked to good UX design. For example, unique and descriptive headings improve readability and comprehension; alt text is helpful when browsers can't load images; and consistent navigation makes it easy for customers to find what they're looking for.

If you've designed your website according to usability best practices, you're likely more than halfway to compliance. Taking your product the rest of the way to meet EAA standards requires a little more commitment, but it's imperative to avoid regulatory penalties, legal troubles, and reputational damage.

Persona Spectrum				
		Permanent	Temporary	Situational
 Touch	One arm	Arm injury	New parent	
 See	Blind	Cataracts	Distracted driver	
 Hear	Deaf	Ear infection	Bartender	
 Speak	Non-verbal	Laryngitis	Heavy accent	



Penalties for Noncompliance

The EAA is clear about member states' power to enforce penalties for noncompliance, but it's not as clear about what those penalties are. Instead, it includes guidelines that leave flexibility for national regulatory bodies to determine and administer penalties that are "effective, proportionate, and dissuasive."

It's worth noting that this is the same language used in the General Data Protection Act (GDPR) – the sweeping privacy legislation rolled out in 2018. EU authorities and regulators in multiple EU jurisdictions have imposed high fines in cases of noncompliance, also for non-EU actors.²

Some EU member states have published the range of possible fines businesses could face for not complying with the (national implementation of the) EAA. Here are a few countries with some of the most severe penalties:

- **France:** Fines up to €7,500, and €15,000 for repeat offenders.
- **Germany:** Penalties can reach up to €10,000, and for more severe offenses, €100,000.
- **Netherlands:** Fines up to €103,000.

Though these fines should serve as deterrent enough, they're not the only drawback of failing to reach compliance. Businesses that don't meet EAA standards will also face:

- **Reputational damage.** Continuing to sell a product or service that is inaccessible can create a PR nightmare for a business that is accused publicly of ignoring the needs of individuals with disabilities. Today more than

ever, customers expect their favorite brands to care not just about profit, but championing causes that create a more inclusive society.³

- **Potential follow-up fines.** Catch the eyes of regulators once, and you could remain in their crosshairs forever. This could lead to additional investigations, fines, and distractions that drain valuable resources from key growth initiatives.
- **Legal troubles.** If you're facing a lawsuit, fines are just the beginning. You could be held responsible for attorney's fees and damages, and the reputational harm you'll face from a public trial could divide your customer base.
- **Prohibition or withdrawal.** In case of continuous noncompliance, the EAA empowers EU member states to take measures to restrict or prohibit the relevant product being made available on the market or to ensure it is withdrawn from the market.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>

³ <https://www.mckinsey.com/industries/retail/our-insights/the-rise-of-the-inclusive-consumer>





E-commerce and the EAA

E-commerce is just one of the many sectors impacted by the EAA. It's also perhaps the most far-reaching by definition of the directive. According to the legislation:

"This Directive defines e-commerce services as a service provided at a distance, through websites and mobile device-based services, by electronic means and at the individual request of a consumer, with a view to concluding a consumer contract.

- 'at a distance' means that the service is provided without the parties being simultaneously present;
- 'by electronic means' means that the service is initially sent and received at its destination by means of electronic equipment for the processing (including digital compression) and storage of data, and transmitted, conveyed and received in its entirety by wire, by radio, by optical means or by other electromagnetic means;
- 'at the individual request of a consumer' means that the service is provided on individual request."

This sweeping definition applies to almost any website or mobile app that processes a transaction between two parties that aren't physically present. Everything from product marketplaces to hotel booking services, auction sites to payment platforms, courses, gambling services, and online ticket providers — these are all covered under the EAA's definition of e-commerce. In Europe, e-commerce is a €324.9 billion industry comprising 461,000 businesses.⁴

⁴ <https://www.ibisworld.com/europe/industry/e-commerce/200600/#TopQuestionsAnswered>

The State of E-commerce for People With Disabilities

Consumers often turn to e-commerce sites because they offer a simple, convenient, and efficient shopping experience. But this is often not the reality for people with disabilities. Their customer journey is vastly different and much more difficult.

For example, many of us take for granted that after we purchase a product we're able to use it for its intended purpose. People with disabilities, on the other hand, have to do the additional research of determining if a product or service will even be accessible to them after they check out. If it's not, are there available adaptations that can make it accessible to them, and are they cost effective?

Too often these buying decisions are made with little confidence, which leaves many consumers with disabilities asking, is there an accessible customer support team who can meet my unique needs if I need assistance post-purchase?

As if this wasn't difficult enough, this research is often taking place on websites that are not accessible, or at least, differently accessible depending on the sector they're shopping in. Studies show that 73% of people with disabilities encounter barriers on one in four websites.⁵

Given these inconsistencies and challenges, it's not surprising that 65% of consumers with a disability say their purchasing options are limited by accessibility issues⁶, 81% say they face issues that are frustrating while shopping online⁷, and more than 40% have abandoned their shopping experience⁸, either online or in-person, as a result.

Perhaps the most troubling accessibility statistic for e-commerce companies is that people with disabilities represent 17% of the population, and after having one poor experience, 70% of them will never return to your business again.⁹

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⁵ <https://reciteme.com/news/accessibility-is-a-necessity-for-online-retailers>

⁶ <https://www.forbes.com/sites/gusalexiou/2022/06/30/retailers-lose-billions-by-not-signposting-product-accessibility--new-report/?sh=504984b14b07>

⁷ <https://makeitfable.com/insights/insights-the-state-of-online-shopping-for-people-with-disabilities/>

⁸ <https://www.forbes.com/sites/gusalexiou/2022/06/30/retailers-lose-billions-by-not-signposting-product-accessibility--new-report/?sh=504984b14b07>

⁹ <https://purpletuesday.co/>

The Massive Opportunity for E-commerce Brands

There are nearly 2 billion people in the world with disabilities with a global spending power that exceeds 8 trillion dollars. When you account for friends and family of people with disabilities, that spending power increases by more than 50% to 13 trillion dollars.¹⁰ What was once thought of as a consumer segment too small to cater to is now too large, and too valuable to e-commerce companies, to ignore.

Some leaders, like Amazon, Walmart, Target, and Costco, are already reaping the rewards of accessibility initiatives. Customers with disabilities say they shop most often for physical products at these four places.¹¹ Among them the clear favorite is Amazon, where 80% choose to do most of their shopping, with Walmart, Target, and Costco as distant runners-up with 10%, 2.5%, and 2.5% respectively.

But those lagging behind accessibility leaders face an uphill battle. A staggering 85% of consumers with disabilities say they limit their shopping to websites they already know are accessible. Breaking into the market for accessible goods will be challenging, even with the new EAA forcing businesses to make the change.

Still, the rewards are worth it. Research shows that 69% will abandon a website when they face accessibility barriers.¹² In the UK alone, that translates to over \$21 billion lost to competitors.

The amount lost from those who walk away from a business is even higher. Remember, this is as many as 70% of people with disabilities who have just one bad experience. And these customers aren't your average consumer.

Not only is this population loyal, with many choosing to shop only where they know they'll find accessible options, but they're also willing to spend more for fewer barriers to purchase. As many as 75% of those with disabilities are willing to pay higher prices for goods and services as long as they're highly accessible, and 86% of users with access needs say they'd spend even more if there were fewer barriers.

From this data, it's clear that there's a business case for making your products and services accessible. So, how do you do it?

2B

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\$8T

69%

will abandon a website when they face accessibility barriers

¹⁰ <https://www.weforum.org/stories/2023/12/driving-disability-inclusion-is-more-than-a-moral-imperative-it-s-a-business-one>

¹¹ <https://makeitfable.com/insights/insights-the-state-of-online-shopping-for-people-with-disabilities/>

¹² <https://reciteme.com/news/accessibility-is-a-necessity-for-online-retailers>

Reaching EAA Compliance in E-commerce

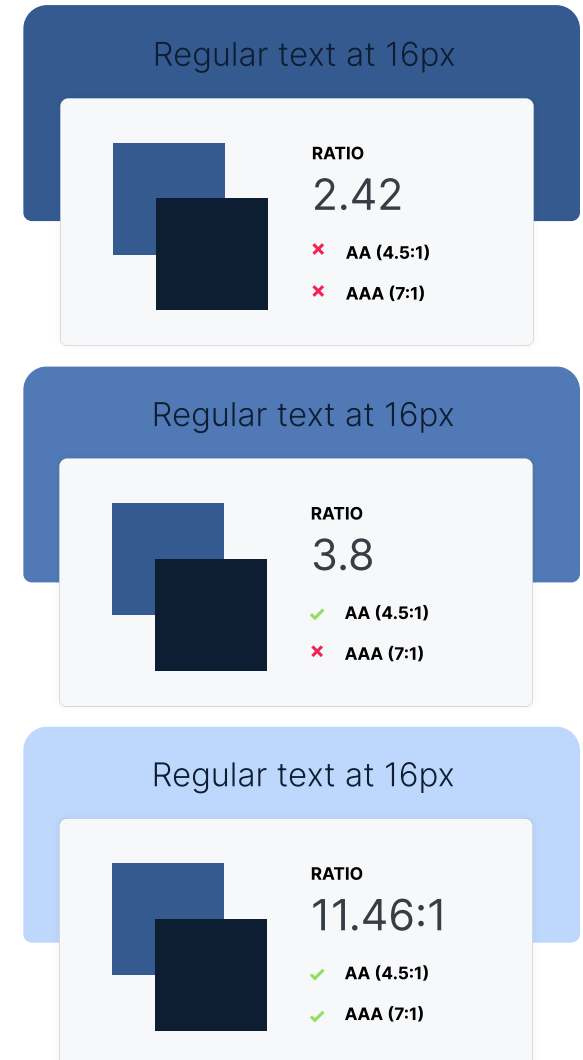
Like it does with penalties, the EAA doesn't lay out specific technical requirements or introduce new standards for compliance. Instead, it offers guidelines that reference established rules for accessibility in EN 301 549, which includes guidance on information and communications technology, and recommends WCAG 2.1 level AA criteria.¹³

The EAA follows the Web Accessibility Directive's four pillars of accessibility:

- **Perceivability.** Users must be able to perceive the information presented. It can't be invisible to all their senses.
- **Operability.** Users must be able to operate and navigate the interface.
- **Understandability.** The operation of the interface and the information it includes should be clear and comprehensible.
- **Robustness.** The content should be robust enough to be interpreted reliably by a wide variety of user agents, including assistive technologies.

The implementation of these principles is organized into three levels:

- **Level A:** These are high-priority criteria that are generally the easiest to fulfill. They allow for the basic and most crucial functions of a website to be accessible. Websites that don't meet these criteria are highly difficult or even impossible for people with disabilities to use.
- **Level AA:** This is the recommended standard for businesses that want to make their sites available to most users with disabilities. It's referred to in many accessibility regulations, including the original WAD and the EAA.
- **Level AAA:** This is the highest level, offering a smooth and accessible user experience for all. Achieving this level is rare, and it's recommended for websites that cater primarily to people with disabilities or the elderly.



¹³ <https://www.wcag.com/compliance/european-accessibility-act>

A Framework for Accessibility

Complying with the EAA isn't a one-time task. It's an initiative you need to embed into every department – from customer service to design, sales to development – and systematize in your operations going forward. Consider this framework when you're preparing for the EAA rollout in June.

- **Conduct a thorough accessibility audit** to evaluate your products, services, and infrastructure against EN 301 549 and WCAG 2.1 standards, ensuring that both digital and physical offerings meet accessibility benchmarks.
- **Don't just get compliant. Stay compliant.** When designing and developing products and services, prioritize accessibility by adhering to WCAG 2.1 guidelines for digital platforms, such as compatibility with assistive technologies like screen readers and voice recognition tools. For physical products, focus on user-friendly features like tactile buttons, clear instructions, and adjustable settings from the start.
- **Train your staff across all relevant departments on accessibility** best practices to foster an inclusive culture. Explain why accessibility is important not just to the business, but those with impairments who struggle to complete everyday digital tasks. Involve individuals with disabilities in testing your products and services to gain valuable insights and address potential barriers.
- **Update internal policies** to integrate accessibility at every stage of development, and maintain detailed documentation to track your efforts and ensure ongoing adherence.
- **Regularly monitor and maintain compliance** by reviewing your products and services after updates or changes, and stay informed about any updates to the EAA or related regulations.
- **Prepare accessibility declarations** for your products and services, as required by the EAA, to demonstrate compliance and promote transparency. Make these declarations easily accessible and understandable to your audience.
- **Engage with national authorities or regulators** to align your interpretation of the requirements with their expectations and keep thorough records of your compliance activities to be prepared for inspections or audits.

 Audit

 Compliant

 Training

 Update policies

 Maintenance

 Declarations

 Engage

Actionable Strategies for a More Accessible E-commerce Experience

You have the framework, but what are some actionable strategies you can implement now to begin making your site more accessible ahead of the June 2025 deadline? Try these 13 tactics, and make their implementation easier with help from [Cloudinary](#).

1. Use Semantic HTML.

Structure your content with semantic HTML elements (e.g., <header>, <nav>, <main>, <footer>, <section>) to improve navigation for screen readers.

Ensure headings (<h1> to <h6>) follow a logical hierarchy to optimally organize information.

3. Ensure efficient keyboard navigation.

Design your website so users can navigate it using only a keyboard. This includes accessing all links, buttons, media players, and form fields via the Tab key. Cloudinary comes built-in with tools that allow users to navigate through image galleries and media players [with keyboard shortcuts](#) for play/pause, previous/next, and even zoom.

Add visual focus indicators to show users where they are on the page.

2. Provide text alternatives.

Add descriptive alt text to all images so screen readers can convey their content, and use long descriptions for (longdesc attribute) for complex diagrams, charts, or pictures. Using a Large Language model, Cloudinary can detect the scene in the image and [automatically generate accurate, understandable, and perceivable alt text for it](#).

Use understandable and perceivable captions for video and audio content to assist users with hearing impairments. Cloudinary can [automatically generate subtitles for videos](#), making this a set-it-and-forget-it shortcut to accessibility.

Cloudinary can also help you [automate text transcripts](#) for audio content, another accessibility best practice.



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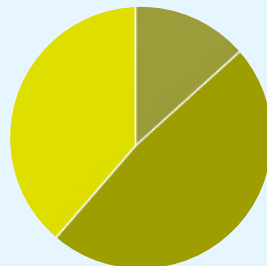

4. Improve color contrast.

Ensure sufficient contrast between text, background colors, and images, to make content viewable for users with visual impairments or colorblindness. In addition to increased functionalities, with Cloudinary, you can see what your images look like to someone who is colorblind with [the simulate_colorblind effect](#). You can also [enable light or dark mode](#) for people with light sensitivity.

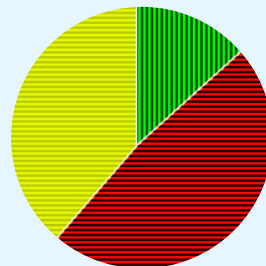
Use a contrast checker tool to verify compliance with WCAG contrast ratio requirements.



```
https://res.cloudinary.com/  
demo/image/upload/  
pie_chart.jpg
```



```
https://res.cloudinary.com/  
demo/image/upload/  
e_simulate_colorblind/  
pie_chart.jpg
```



```
https://res.cloudinary.com/  
demo/image/upload/  
e_assist_colorblind/  
pie_chart.jpg
```

Don't rely on color only to convey information. For example, a pie chart separated into red and green segments will be difficult for someone with deuteranopia (difficulty perceiving green and red light) to distinguish between. Cloudinary's [e_assist_colorblind effect](#) allows you to add stripes to highlight the difference between certain colors to people who can't tell the difference between them.

5. Ensure content is descriptive and clear.

Use descriptive headers to break up text and improve comprehension.

Make sure labels and navigation are clearly defined so users can easily access the information they're looking for.

Use clear, descriptive text for links (e.g., "Learn more about our services" instead of "Click here") so users understand their purpose.

6. Label form fields clearly.

Use `<label>` tags for input fields and ensure they are associated with the correct elements.

Provide clear and helpful error messages and instructions for form submissions.

7. Optimize for screen readers.

Ensure content is presented in a logical reading order.

Use skip links to allow users to bypass repetitive navigation and go directly to the main content.

Apply ARIA (Accessible Rich Internet Applications) roles, landmarks, and properties to enhance the experience for screen reader users, particularly for interactive elements like modals or sliders. Cloudinary enables the use of elements that allow screen readers to relay information to customers about valuable aspects of a product, like material, texture, color, and style.

8. Offer resizable text and images.

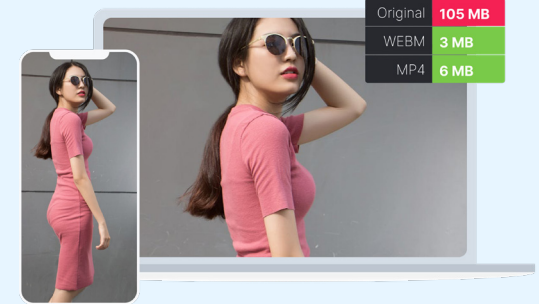
Allow users to resize text up to 200% without loss of functionality or content overlap.

Leverage Cloudinary to allow people with visual impairments to use their keyboard to [zoom in on key details in product images](#).



9. Test for responsiveness.

Make sure your website is fully functional and accessible on all device types and screen sizes, including mobile phones and tablets. With Cloudinary, you can be sure that the visual content you publish will be [optimized for any screen size and environment](#).



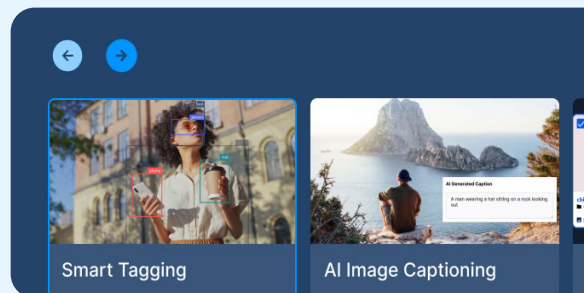
10. Avoid or explain dynamic content.

Avoid using content that automatically updates or moves without user interaction (e.g., carousels, pop-ups). If these elements are necessary, provide controls to pause or stop the motion.

11. Add user controls.

Include options like adjustable font sizes, color themes, or text-to-speech functionality to accommodate various user needs.

Consider adding an accessibility widget to simplify adjustments for users.



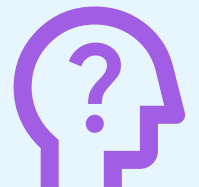
12. Test accessibility.

Regularly test your website using automated tools. Cloudinary allows you to test for accessibility with its [accessibility analysis tool](#), which can offer benchmarks for improvement.

Conduct manual testing with assistive technologies such as screen readers, magnifiers, and voice commands.

13. Gather user feedback.

Involve people with disabilities in testing and seek feedback to identify and resolve accessibility issues.





Get EAA Compliant With Help From Cloudinary

For too long, people with disabilities have been excluded from digital experiences that many of us take for granted. Making your website accessible to this population is not only a crucial step toward creating an inclusive online presence, but a way to win business from a market segment with \$13 trillion of spending power.

No matter how you view accessibility or the EAA, meeting its standards is mandatory come June 2025. Instead of delaying your accessibility initiatives and risking fines, lawsuits, and business suspension, get started on your journey to compliance today with help from Cloudinary.

With a range of tools to help you test, optimize, and achieve accessibility, Cloudinary's AI-enabled visual solution can help you excel at delivering high-quality visual experiences not just in the EU, but wherever – and however – your customers engage with your brand. Learn more by [scheduling a complimentary demo](#).





Cloudinary is the image and video platform that enables the world's most engaging brands to deliver transformative visual experiences at global scale. More than two million users and 10,000 customers, including Adidas, Bleacher Report, Etsy, Fiverr, Grubhub, Minted and Paul Smith rely on Cloudinary to bring their campaigns, apps and sites to life. Backed by an ecosystem of more than 300 partners, integrations and plug-ins, Cloudinary's AI-powered image and video solutions offer a single source of truth for brands to manage, transform, optimize, and deliver engaging visual content to anyone, anywhere. As a result, brands across all industries are seeing [up to a 203% ROI](#) with benefits including faster time to market, higher user satisfaction and increased engagement and conversions.

For more information, visit www.cloudinary.com.

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