

**Whitepaper**

# The European Accessibility Act (EAA): Impact on Online Retailers

The European Accessibility Act (EAA) is a landmark EU directive that will soon reshape the digital commerce landscape. Passed in 2019, the EAA mandates that many products and services – including e-commerce websites and apps – be accessible to people with disabilities. By 28 June 2025, these accessibility requirements become enforceable across all EU Member States ([European Commission](#)). This white paper explains what the EAA means for retail brands (B2C and B2B alike) and how businesses (even those based outside the EU) must prepare now. It provides a clear overview of key EAA requirements for online retailers, the legal and business risks of non-compliance, and the critical steps retailers should take to meet requirements.



# Understanding the EAA: Scope and Obligations for Retailers

The European Accessibility Act (Directive (EU) 2019/882) aims to harmonise accessibility rules across Europe, ensuring a “single market” for accessible products and services ([European Commission](#)).



## Who must comply?

In short, any business that sells products or services to consumers in the EU must meet the EAA's accessibility requirements. This **includes public and private-sector digital services and extends to non-EU companies** that operate in the EU market ([Allyant](#)). If you run an online retail site or app serving EU customers, you are within scope. (The only notable exemption is for microenterprises – firms with fewer than 10 employees and under €2 million turnover – which are exempt from the EAA's service requirements)

## What does the EAA require?

For e-commerce retailers, this means your online store must be usable by everyone, including those with visual, auditory, physical or cognitive impairments. The law explicitly covers e-commerce platforms ([European Commission](#)), and it aligns with international accessibility standards.

EU Member States are adopting the harmonised European standard EN 301 549, which incorporates WCAG 2.1 Level AA as the baseline for digital content. In practical terms, **retail websites and apps must conform to all WCAG 2.1 AA success criteria by the deadline**, covering a wide range of requirements – from providing text alternatives for images to ensuring full keyboard navigation and screen-reader compatibility on every page.



# Key Accessibility Requirements for E-Commerce Platforms

For retailers, it's important to understand the concrete implications of “accessibility” in the context of e-commerce. The EAA's requirements for online platforms can be summarised as follows:



**Perceivable content:** All information and media on your site/app must be presented in ways that all users can perceive. This means providing text alternatives for non-text content (e.g. alt text for images, transcripts for audio/video) and ensuring content is adaptable (text must be resizable, pages should work with high-contrast modes, etc.) ([Contentserv](#)). Time-based media (like videos) will need captions or audio descriptions so that no user is excluded.



**Intuitive design:** Content and user interface should be clear and consistent, with instructions and error messages that are easy to understand. Form fields must have accurate labels and clear error indication – for example, checkout forms should identify missing or invalid information in text, not just colours. Moreover, your site's code should be robust enough to work with a variety of assistive software (screen readers, screen magnifiers, braille displays, etc.). Following semantic HTML best practices is crucial – headings, lists, buttons, and other elements should be coded properly so that assistive tech can parse the site structure ([Siteimprove](#)).

These requirements encapsulate the core principle that **shopping online should be as barrier-free as shopping in a physical store with proper accommodations**. Whether a customer has a visual impairment requiring a screen reader or a motor disability requiring only keyboard usage, they must be able to browse products, complete transactions, and access customer service on your digital platform.



**Operable interface:** Interactive elements and navigation must be usable by keyboard alone and by assistive technologies. Users who cannot use a mouse or touchscreen should be able to browse products, use filters, add to cart, and complete checkout via keyboard or voice commands. This involves proper focus indicators, skip navigation links, and no keyboard “traps”. Dynamic widgets (such as menus, pop-ups, product carousels) should be built with accessible code (utilising ARIA roles and labels where needed) so that screen readers can interpret them ([Siteimprove](#)). There must also be no time limits or flashing content that could harm users (unless alternatives or controls are provided per WCAG guidelines).



**Accessibility support and information:** Retailers will also need to provide customers with information about the accessibility features of their products and services. For example, if you sell a smart appliance that has accessibility features, those should be documented in an accessible format for consumers. On the digital side, customers should be able to find information (or an accessibility statement) about how to use the site's accessible features or contact support for accessibility assistance. Additionally, businesses are expected to maintain **documentation demonstrating their service's compliance with the EAA**, ready to provide to regulators if required (European Union). In practice, this means conducting accessibility conformance evaluations and being able to show proof (e.g. audit reports or a Declaration of Conformity for accessibility) that your e-commerce platform meets the standards.



# Timeline and Enforcement Deadlines

The Act was published in 2019, adopted into EU countries' laws by 2022, enforceable from June 28, 2025, with a further 2030 deadline to phase out existing non-compliant products ([Business Disability Forum](#))

## April/June 2019 Directive Adopted:

The European Accessibility Act was approved and published in mid-2019

## 28 June 2022 National Laws in Place:

EU Member States had to transpose the EAA into their national legislation. In other words, by mid-2022 each country should have passed its own laws or regulations mirroring the EAA requirements.

## 28 June 2025 Enforcement of Requirements Begins:

from 28 June 2025 onward, all new products and services placed on the market must be EAA-compliant. For online retailers, this means your website, mobile apps, and digital services offered to EU consumers must meet accessibility requirements by this date. There are no extensions or grace periods for e-commerce services – the law kicks in fully in mid-2025. Importantly, this date also opens the door for enforcement actions: customers can invoke their rights and regulators can begin checking compliance on or after 28 June 2025 ([Business Disability Forum](#))

## Transition Period up to 2030 (Limited Scope):

The EAA includes a transitional allowance until June 2030 for certain cases, mainly to do with physical infrastructure and long-life products. For instance, service providers can continue using existing self-service terminals or equipment that were in use before 2025 until 28 June 2030 (at the latest) ([European Union](#)). By 2030, even these legacy systems must be replaced or upgraded to accessible versions. Note: This 5-year grace primarily affects things like ATMs, kiosks or other hardware; it does not mean websites can remain inaccessible until 2030. Online services are expected to comply by 2025 – the 2030 date is about phasing out non-compliant physical products that were already in service.

Each EU country is responsible for **enforcing the EAA at a national level**. Governments will designate enforcement bodies (or use existing regulators) to oversee compliance, handle consumer complaints, and apply penalties. By 2025, retailers should expect that customers or advocacy groups will be empowered to report accessibility issues either through courts or through these enforcement agencies ([Business Disability Forum](#))





# Why Compliance Is Legally Required (and Good for Business)



Retailers who ignore these requirements risk having their offerings deemed non-compliant and illegal to sell. EU countries are obliged to ensure that only accessible products/services are available post-2025, effectively making accessibility a condition for market access. Put simply, if your e-commerce site or app does not meet the standards, you could ultimately be barred from serving the EU's 440 million consumers (Allyant).

There are compelling business reasons alongside the legal mandate. **The population of people with disabilities in EU counts around 87 million people** (roughly one in four adults, when broader definitions are considered) (European Commission). Together with their families, they represent a significant consumer market and spending power. An accessible website means you're not turning away these customers. In fact, the EAA's harmonised rules are expected to expand market opportunities for businesses: companies that invest in accessibility can more easily offer their services across all EU countries without worrying about different national rules (Business Disability Forum). Retailers that get ahead on accessibility can gain a competitive advantage in an inclusive market, improving brand reputation and customer loyalty. Moreover, many accessibility improvements (like fast, well-structured websites, captioned videos, good colour contrast, etc.) also enhance the overall user experience for everyone.

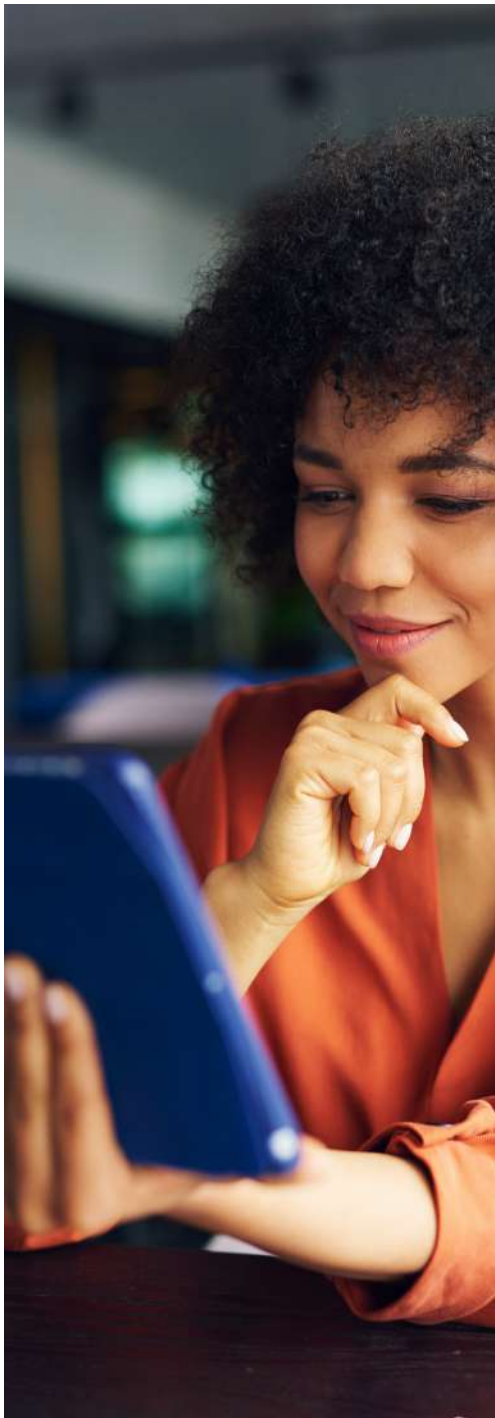
**Chintan Shah, Head of QA for The Commerce Team Global** explains that: "Retailers are legally required to comply with the EAA, and doing so also aligns with modern business values of inclusion, social responsibility, and broad customer reach, which represents an opportunity to improve digital storefronts and user experience for all."



# Risks of Non-Compliance:

## Financial, Legal and Reputational Consequences

Failing to meet the EAA's requirements is not a viable option – the risks are severe and multifaceted:



### Legal Penalties and Market Bans:

Each EU country will impose penalties for non-compliance that are “effective, proportionate and dissuasive” by law (European Union). While the exact fines differ by country, businesses can expect substantial fines for accessibility violations. For example, administrative fines might range from €5,000 up to €20,000 per violation in some jurisdictions. If issues remain uncorrected, regulators may levy daily fines (e.g. ~€1,000 per day) until compliance is achieved. Some national laws are even stricter – reports indicate possible penalties as high as €50,000 or more for serious cases, and a few countries (like Ireland or Austria) have contemplated fines in the six figures. In Germany, non-compliant companies can face fines for each offence and higher fines for repeat offences (Fieldfisher). Beyond monetary fines, authorities have the power to take corrective measures – they can order the removal of non-compliant digital offerings from the market or ban further sales until issues are fixed.

### Lawsuits and Enforcement Actions

The EAA creates clear rights for consumers and watchdog organisations to challenge businesses that aren't accessible. Companies that ignore accessibility may find themselves defending against lawsuits or discrimination claims. In the United States, web accessibility lawsuits under the ADA have become common; a similar trend could emerge in the EU under the EAA. Users (and advocacy bodies) will be empowered to file complaints or take legal action if they encounter barriers on your site.



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### Reputational Damage:

If a retailer is seen as failing to cater to people with disabilities, the public fallout can be significant. Accessibility is increasingly regarded as a hallmark of corporate social responsibility and good customer service.

### Lost Customers and Revenue:

Ignoring accessibility is economically self-sabotaging. According to the UK's Business Disability Forum, **75% of disabled people and their families have walked away from a business due to poor accessibility**. In B2B contexts, large organisations now often require their suppliers to meet accessibility criteria, so you could also lose contracts if your digital platform isn't accessible.



# Urgency for Retailers:

## Why Action Is Needed Now

Unlike a simple software patch or a policy update, making an e-commerce platform accessible involves cross-functional effort and potentially significant technical work. It will not happen overnight. In our opinion, retailers should recognise a few realities:

### **Development and remediation take time:**

Bringing a complex retail website or mobile app up to WCAG 2.1 AA standards can require deep code changes and rigorous testing. Many retailers have hundreds or thousands of pages, dynamic content, third-party integrations (payment gateways, chatbots, analytics scripts, etc.), and legacy code. Identifying all accessibility issues (through audits) and fixing them one by one can potentially take a months-long process for larger sites. For instance, adding proper form labels, ARIA attributes, error message handling, alt texts for all product images, ensuring modals and menus are keyboard-accessible – all these fixes must be developed and tested across different browsers and assistive technologies. .

**Organisational change and training:** Achieving compliance also requires a shift in how your organisation approaches digital content and development. Your designers should learn to design with contrast and screen reader flow in mind; your content authors need to write descriptive link text and alt text; your developers and QA testers must include accessibility checkpoints in their workflows. Many retailers are establishing ongoing governance for accessibility – e.g. assigning responsibility to an accessibility coordinator or integrating accessibility into their QA checklists.

**Testing and iteration:** Achieving true WCAG compliance often requires multiple rounds of testing – including automated scans, manual expert audits, and user testing with people with disabilities. Budget and time must be allocated for iterative improvements.

### **Technical complexity and platform challenges**

Some e-commerce platforms (whether custom-built or off-the-shelf like Salesforce, Shopify, etc.) may not be fully accessible out-of-the-box. Retailers might need to upgrade platform versions or install specific accessibility modules. Custom features (product configurators, interactive store locators, AR try-on features, etc.) might need redesign to be accessible. The EAA effectively demands a “fundamental restructuring” of how e-commerce sites function in certain cases, meaning features that cannot be made accessible might have to be replaced or removed. All this requires careful planning, development sprints, and possibly coordination with platform vendors or third-party developers.

**Third-party content and suppliers:** It's common for retail sites to incorporate third-party content (e.g. product videos from brands, social media feeds, embedded reviews) or to rely on third-party software (live chat plugins, recommendation engines). Under the EAA, you're responsible for the accessibility of the overall service. That means coordinating with external content providers or vendors to ensure their contributions are accessible, or finding alternatives if they are not.

“Strategic planning and proactive retailers can market their accessible platforms as a positive differentiator. Now is the time to act, not only to avoid penalties but to ensure your business thrives in an inclusive digital economy. **Kalpesh Patel, CIO at The Commerce Team Global.**”





# Achieving Compliance:

## How to Approach It and How We Can Help

Ensuring your e-commerce channels meet the EAA's standards is a complex but achievable goal – and it starts with a structured, strategic approach. At **The Commerce Team Global**, we guide retailers through every phase of accessibility transformation with a process designed to deliver measurable compliance with **WCAG 2.2** and alignment with the European Accessibility Act.

**Our methodology combines technical planning, execution, and testing:**

# 01.

### **Comprehensive Accessibility Testing**

We begin by conducting a thorough audit of your website or mobile application, using a combination of automated and manual testing tools including axe, NVDA, and WCAG Contrast Checker. We go beyond diagnostics by incorporating real user testing with people who use screen readers and other assistive technologies, validating that the site works as required.

# 02.

### **Structured Reporting and Prioritised Action Plans**

The findings are consolidated into a report that includes a summary of issues, severity ratings, and step-by-step guidance to achieve the desired goals. This enables your teams to prioritise fixes based on impact and urgency, ensuring that resources are deployed effectively. We also identify areas where technical debt or third-party tools may be limiting compliance and propose alternatives.

# 03.

### **Remediation and Platform Enhancements**

Our team of system integrators then works to implement the required technical enhancements. Whether you operate on platforms like Shopify, Magento, Salesforce Commerce Cloud or bespoke builds, we modify the underlying code, user interface components, and integrations to align with WCAG 2.2 standards.

# 04.

### **Integration Into the Development Lifecycle**

We work with your developers, designers, and content teams to embed accessibility practices into your development workflows. We provide guidance on how to maintain compliance with every code release, content update, or site refresh, reducing the risk of regression.

# 05.

### **Ongoing Support, Monitoring, and Governance**

We offer ongoing monitoring and advisory support. As WCAG evolves and EAA enforcement matures post 2025, we'll help you stay ahead. This includes periodic health checks, training sessions, and governance frameworks to ensure your organisation continues to meet both legal requirements and user expectations.



# Final Takeaways:

## Embracing Accessibility as a Retail Best Practice

The European Accessibility Act is set to transform digital commerce in 2025 and beyond. Accessibility is no longer a “nice-to-have”. Retailers who act now to comply with the EAA will avoid penalties and legal troubles but also position themselves as leaders in an inclusive marketplace.

The Commerce Team Global can help your organisation navigate this journey. We invite senior decision-makers to view accessibility not just as a compliance task, but as an opportunity to improve customer experience, drive innovation, and uphold values of equality and inclusion, delivering richer experiences to every customer.

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 The Commerce Team Global

