



EUROPEAN UNION OF THE DEAF

A European Non-Governmental Organisation in official liaison with European Parliament, European Commission and the Council of Europe

Report on the implementation of the European Accessibility Act

INTRODUCTION

As the only supranational organisation representing all deaf people before the European Union through a network of National Associations of the Deaf from 31 countries, the European Union of the Deaf (EUD) is issuing a report on the implementation of the Directive 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services¹, most commonly known as the European Accessibility Act. This report is produced as part of the EUD series of reports on the implementation of accessibility legislation instruments. The other two reports analyse the implementation of the European Electronic Communications Code (EECC) and the Audiovisual Media Services Directive (AVMS). The purpose of this report is to assess the effects of the implementation of the European Accessibility Act among 1 million deaf people who are sign language users and living in the European Union and the EEA. The report will identify the shortcomings of the EAA as well as provide recommendations to strengthen its implementation. This report is timely published as the European Accessibility Act obligations are applicable as from 28 June 2025.

Purpose of the Directive

The European Accessibility Act (hereafter “EAA”) aims to make sure that certain products and services, especially digital ones, are accessible across the EU and in some specific areas, among others, passenger transport services and consumer banking services. It does this by setting common accessibility rules, so that different national laws do not create barriers to the free movement of goods and services within the EU.

¹ Directive 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, *OJL 151*, 7.06.2019, pp. 70-115.

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The EAA is a Directive setting out minimum requirements that must be followed by EU Member States. Yet, Member States may impose stronger obligations and expand the scope of the obligations to other areas. Moreover, public and private economic operators, being any manufacturer, their authorized representative, importer, distributor or a service provider, must ensure that any product they place in the EU market or any service they provide covered by the scope of the Directive comply with it. To do so, they can choose to follow voluntary harmonised European standards. And if they do it, these standards create a 'presumption of conformity', meaning that products and services which meet them are assumed to comply with the EAA.

By having the same basic rules across the EU, the EAA helps ensure that more accessible products and services are available for persons with disabilities, including deaf people. It also makes it easier for companies to operate across borders by having a single set of rules to follow.

Timeline (Art. 31)

The EAA entered into force on 27 June 2019. Member States were given three years to adopt and publish the necessary national laws, regulations, and administrative provisions to ensure compliance. Member States were subsequently given three years, until 28 June 2025, to ensure the full application of these measures, subject to certain exceptions. Member States may postpone compliance with requirements related to the answering to emergency communications to the single European emergency number '112' until 28 June 2027. Furthermore, facilities of service providers and products that do not meet accessibility requirements but were already in use before 28 June 2025 may continue to be used until 28 June 2030. However, inaccessible self-service terminals are subject to a specific limitation: they may only be used for up to 20 years and must be phased out by 28 June 2045. The European Commission will conduct an initial report on the application of the EAA by 28 June 2030, and every five years thereafter (Art. 33).

Methodology

This report presents our analysis of legislation concerning the rights of deaf people, based on desk research and enriched with qualitative insights gathered in May 2025 from representatives of National Associations of the Deaf, during a focus group consultation². In this report, we outline the main obligations set out in the European Accessibility Act (EAA) that are relevant to deaf people. We specifically address only some products and services within the scope of the EAA that have particular relevance to the accessibility needs of deaf people, with one exception. The obligations lying upon the answering to the emergency communications to the single European emergency number '112' are addressed in our report on the implementation of the European Electronic Communications Code³ as its obligations are intertwined with the EAA's obligations in the field of telecommunications and emergency communications.

SCOPE

While the name of the European Accessibility Act is ambitious and has sometimes been

² Belgium, Croatia, Iceland, Italy, Luxembourg, Romania, Slovakia and Spain.

³ Available at: <https://eud.eu/euds-report-on-the-implementation-of-the-european-electronic-communications-code/>. Last consulted on 19 June 2025.

compared to the United States' Americans with Disabilities Act ("ADA"), it is of utmost importance to note that the EAA does not address accessibility in any area nor for every product placed and service provided in the EU. To the contrary to the ADA, the EAA does not cover employment, education, healthcare, among others, nor does it cover all products and services in the addressed areas such as audio-visual media services, public transportation, and banking services.

Indeed, the scope of the products and services is limited to four levels.

First, the areas encompassed in the EAA are mainly limited to ICT and digital environment, passenger terminal transport, consumer banking services, and e-commerce, among others. It excludes other relevant areas where deaf people face accessibility issues in accessing information and communication such as healthcare services where they often face major issues in communicating their health issues and receiving proper care, employment, causing long-term unemployment and/or disrupted careers among deaf people, and emergency services. For the latter, the EAA addresses the accessibility of the single European emergency number '112' but does not extend its obligations to answering communications to national emergency numbers nor to emergency services themselves. Under the EAA, deaf people may benefit from the accessibility of 112 but experience a lack of accessibility to other national-based emergency communications, putting their lives in danger. Regarding the built environment, the scope of application of the EAA is limited to buildings where digital services are provided and it is not mandatory. In other words, digital service providers may voluntarily commit to render the built environment of their services accessible. For deaf people, it may cause higher stress levels due to the issues they may experience in navigating in the buildings (i.e. inaccessible intercom systems and lift emergency communication systems).

Second, the list of products and services falling under the scope of the EAA is non-exhaustive (Art.2). The products and services are limited to:

- General-purpose computer hardware and operating systems (i.e. laptops);
- Self-service terminals such as Automatic Teller Machines (ATMs), ticketing machines, check-in machines, and interactive self-service information terminals providing information;
- Telephony services (i.e. messaging services) and related consumer terminal equipment with advanced computing capability (i.e. smartphones, tablets, etc);
- Services to access audio-visual media services (i.e. digital television services) and related consumer equipment with advanced computing capability (i.e. smart TVs);
- Air, bus, rail and waterborne passenger transport services provided at national or international level such as websites, mobile device-based services, electronic ticketing services and delivery of transport service information (including real-time travel information);

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- Customer banking services (i.e. credit agreements, payment services, services linked to the payment account, identification methods);
- E-readers and e-books;
- E-commerce services (i.e. online sale of a product or service);
- Answering emergency communications to the single European emergency number '112'.

Among this limited list of products and services, there are some subcategories that have been excluded, while they are mainly significant for deaf people. For example, the services for urban, suburban and regional transport are not covered by the EAA and deaf people still face major issues in accessing information while using them as opposed to the national transportation services that are covered by the EAA. Furthermore, the EAA does not cover commercial and publicly funded media or news websites, despite recommendations from the European Parliament's Committee on Employment and Social Affairs⁴. While it includes digital TV services and electronic programme guides (EPGs), it excludes essential "access services" like subtitles, sign language interpretation, and audio description, and sets no quality standards. As a result, many media platforms remain inaccessible to deaf people, highlighting a missed opportunity for a harmonised EU approach to accessible audiovisual content. The Committee on the Rights of Persons with Disabilities recommended the European Union, in its 2025 concluding observations, to "adopt legislation to guarantee accessibility of the built environment, products and information"⁵.

Third, the economic operators that are bound by the EAA are defined in the broad sense as being any product manufacturer (art. 7), their authorized representative (art. 8), importer (art. 9), distributor (art. 10) or a service provider (art. 13). However, not all of them are obliged to comply with the EAA: microenterprises defined as enterprises employing fewer than 10 persons and with an annual turnover or an annual balance sheet total not exceeding EUR 2 million (art. 3 (23)) are exempted from the obligations due to their limited human resources, annual turnover or annual balance sheet (Recital 70 and art. 4).

Fourth, the EAA allows economic operators to exempt themselves from accessibility requirements if compliance would fundamentally alter the product or impose a disproportionate burden (art. 14). Annex VI outlines criteria for this assessment, including organisational costs, development expenses, and the balance between cost and benefits for persons with disabilities. However, deaf national sign language users, being a linguistic and cultural minority, risk being

⁴ Opinion of the Committee on Employment and Social Affairs for the Committee on the Internal Market and Consumer Protection on the proposal for a directive of the European Parliament and of the Council on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services, 2015/0278 (COD), 6.04.2017, Amendment to Article 1, paragraph 2, point b, p. 13.

⁵ Committee on the Rights of Persons with Disabilities, Concluding observations on the combined second and third periodic reports of the European Union, CRPD/C/EU/CO/2-3, §27(c).

overlooked, as economic operators may exploit vague criteria to avoid compliance⁶. A consultation with EUD Members in May 2025 highlighted the need for clearer definitions of assessment criteria to determine the benefits for deaf national sign language users and how these should be weighed against the costs, which economic operators may use to justify claims of disproportionate burden and seek exemption from complying with the EAA. Although the EAA empowers the European Commission to adopt a delegated act to clarify Annex VI, no such act has been issued to date, leaving economic operators significant discretion.

In conclusion, while the European Accessibility Act is a positive step, it remains limited in scope and leaves major gaps for deaf people, excluding areas like employment, healthcare, and emergency services in general. The EAA's narrow focus on specific digital and ICT-based services and products, coupled with the exclusion of key subcategories, such as regional transport, news media platforms and access services for the accessibility of audiovisual media services, fails to reflect the full spectrum of accessibility barriers experienced by deaf people across the EU. Moreover, microenterprises and other economic operators are exempt from the EAA if meeting its requirements would significantly change their product or service or cause a disproportionate burden, reducing the Act's overall impact. As a result, the EAA falls short in addressing the full accessibility needs of deaf people across the EU.

STATE OF THE PLAY

As the EAA obligations take effect from 28 June 2025 and given that economic operators were granted a minimum of three years to make their products and/or services accessible under nationally transposed legislation, the European Union of the Deaf (EUD) held an interactive workshop in May 2024 on the EAA and the EECC regarding the access to emergency communications. Based on the first outline of data collected from this event, the EUD conducted a consultation in May 2025 to deepen the findings and assess the state of play. This consultation gathered qualitative insights from deaf representatives of EUD Members, namely the National Associations of the Deaf, through a dedicated focus group discussion⁷.

Customer banking services

Deaf people across several European countries face notable accessibility barriers in using online banking services, particularly in urgent or security-sensitive situations like blocking a lost bank card. The accessibility barriers are encountered both online and in-person.

Firstly, while some banks allow interpreters to support communication between deaf customers and bank staff, most do not permit card blocking via third-party calls, a major issue in countries like Romania, Spain, and Croatia. Deaf people often rely on others to interact with banks, but in

⁶ Mark Wheatley's intervention at the Public Hearing for a Proposal on the EAA, available at [https://www.europarl.europa.eu/RegData/etudes/IDAN/2016/571382/IPOL_IDA\(2016\)571382_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2016/571382/IPOL_IDA(2016)571382_EN.pdf)

⁷ Belgium, Croatia, Iceland, Italy, Luxembourg, Romania, Slovakia and Spain.

security-sensitive situations, they are denied the necessary services due to banks' refusal to allow "direct" communication. Video relay services are frequently rejected by banks for identification and security reasons. In most countries, banks do not take responsibility for ensuring access to these services for deaf customers. As a result, video relay service providers struggle to maintain operations due to limited support from banks, as seen in Belgium, and low user numbers leading to underfunding. Spain stands out as an exception, where two banks, one regional and Caixa Bank, offer video relay services via SVIsual, with Caixa Bank recently making all its branches accessible in both Spanish Sign Language (LSE) and Catalan Sign Language (LSC). While some businesses provide customer service via email or written chat, these options are often hard to find or use. Deaf people also face significant language barriers when no sign language support is available. Written communication can be slow and easily misunderstood, particularly for deaf users with limited written language skills. Phone-based banking services add further challenges, multilingual menus, such as in Luxembourg, can confuse hard-of-hearing users trying to choose the correct option, for example, to block a card. Although some banking apps offer chat features, communication barriers persist due to the lack of sign language access and inadequate staff training, even in branches that display disability-friendly signs, as seen in Croatia.

In summary, a common barrier across countries is that security policies make it difficult for deaf users to contact banks remotely, even when using trusted services like video relay. Most banks do not offer sign language interpretation, and written communication alone is often not sufficient for many deaf sign language users. As a result, accessibility remains incomplete and inconsistent, frequently depending on external advocacy or individual solutions.

Customer services of digital device providers

Customer service inaccessibility is not limited to the banking sector, other economic operators, such as digital device providers selling smartphones, laptops, and tablets, also present significant barriers for deaf users. Indeed, deaf people who wish to buy a smartphone or other digital devices such as laptops or tablets often face barriers in contacting remotely the customer service of companies selling these products, referred to as distributors under EAA terminology.

In most of the countries, namely Belgium, Italy, Slovakia, Iceland, Romania, Luxembourg, and Croatia, deaf people cannot directly and remotely contact smartphone companies' customer service in their national sign language. Italy has a partial solution through Communic@ENS, a video relay service provided by ENS 10 hours a day (09:00–20:00, Monday to Sunday), where deaf people can call customer services using sign language or written language. The same applies in other countries where video relay services are provided to deaf people (i.e. Belgium, Slovakia, Iceland).

In Spain, companies like Apple and Samsung offer sign language accessibility through their customer services. However, for other companies, such as Movistar, deaf people can reach their customer services through a video relay service called SVIsual accessible 24/7 thanks to an agreement between the companies and CNSE.

Therefore, in most of the countries analysed, deaf people are unable to directly access the customer services of digital device distributors in their national sign language. Instead, they often depend on national video relay services to communicate indirectly. However, due to significant disparities in the availability of these services across Europe, with some countries, such as Croatia and Romania, offering no video relay services at all, as highlighted in the EUD report on the implementation of the European Electronic Communications Code, deaf people face unequal access to customer services for digital devices.

Only a few good practices were identified, for example, some countries have agreements with distributors to provide video relay services, while in Spain and the United Kingdom, Apple offers its own customer service in LSE and BSL. These examples should be replicated by all economic operators whose products and services fall under the scope of the EAA and implemented consistently across the EU.

Website and mobile accessibility of digital device providers

The same applies to the websites and mobile apps of companies selling digital products: they are generally not accessible to deaf people, especially in terms of sign language access.

In Belgium, although companies are increasingly aware of the need for accessibility, they lack guidance and coordination on how to implement it effectively. Deaf organisations often take on the role of raising awareness but receive no government funding to do so. Written information has seen improvements, but sign language accessibility remains limited, and advocacy efforts face ongoing challenges.

In Spain, some companies have begun offering SVIsual services thanks to the European Accessibility Act (EAA). However, implementation is inconsistent, and companies sometimes claim there are too few deaf users to justify the service. Despite strong legal backing, compliance is weak, and deaf-led advocacy must repeatedly remind companies of their obligations.

In conclusion, while there are some isolated improvements, most platforms remain inaccessible for deaf users, particularly in sign language. Improvements should include mandatory sign

language support, better government accountability, and funded roles for deaf organisations in accessibility monitoring.

Customer accessibility of national passenger transport services

Even though national passenger transport services are often publicly funded and/or required to serve all citizens under the universal service obligation, their customer services, both in person and online, including websites and mobile apps, remain inaccessible.

In most countries reviewed, the national passenger transport websites or mobile apps are not accessible in sign language for deaf people. Romania offers some in-person support for transport reimbursement and route guidance through sign language interpreters or written communication, coordinated by Deaf community leaders. However, online or app-based sign language content is not available. In Croatia, national train services use pictogram boards to aid communication, which is not the appropriate way to communicate with deaf people, and there is no provision for sign language, making it inadequate for deaf users. At airports, disability support services' communication buttons offer spoken help, which excludes deaf users. In Spain, the national train operator RENFE previously used SVIsual but now employs staff proficient in sign language (deaf or hearing) to assist with booking and customer support, offering direct communication between deaf customer and their staff. However, sign language availability is inconsistent, and other services like Iberia Airlines claim accessibility without truly offering SL support. There are also concerns about the insufficient proficiency level (e.g. A1 level SL) among the services and this needs to be assessed with deaf people in different regions of the country. In summary, while some countries offer partial or in-person solutions, most national transport services still lack proper sign language accessibility on their websites or apps, leaving many deaf travellers without equal access.

Accessibility of the real-time travel information provided by national passenger transport services

The lack of national sign language accessibility by national passenger transport services is also concerning when it comes to providing real-time travel information, which they are required to make accessible to persons with disabilities, including deaf people.

Access to real-time travel information for deaf people from national passenger transport services is still only partially accessible and often excludes sign language or clear alternatives. In Belgium, digital boards and mobile apps have improved, offering updates like platform changes. However, in-train announcements remain voice-based, and technical limitations mean text updates are not always available. Spain faces similar issues, with no sign language access and written messages that are often too brief or unclear during disruptions. Moreover, in-train staff usually do not know sign language. In Romania, while apps provide information, the content is often too complex, and even though deaf users can sign up for SMS alerts, the messages are not adapted for their understanding and accessibility, leading to a poor user experience. In Iceland, where there is no train system, national bus and road services send app and SMS alerts about disruptions, allowing deaf users to receive tailored notifications, similar to airline delay updates. In all these countries, the lack of sign language access and limited adaptation of written content

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continues to exclude many deaf users from receiving reliable and accessible travel information. In conclusion, while written and digital notifications exist, they are often insufficiently adapted to deaf users' needs, and sign language access is generally absent across all countries examined.

Conclusion

Across the sectors assessed, banking, digital devices, and national passenger transport, deaf people continue to face persistent and structural accessibility barriers. These include limited or absent national sign language support, inaccessible written communication, and banks' refusal to accept video relay services due to security concerns. These obstacles remain despite the binding obligations of the EAA.

While isolated progress has been noted in countries like Spain and the UK, it is inconsistent and rarely extends beyond specific companies. Websites and mobile apps largely lack sign language content, and written alternatives are often too complex for many deaf national sign language users.

The main reason for these shortcomings in the implementation of the EAA can be found in the lack of understanding and accurate application of the accessibility requirements stated in the EAA by the economic operators.

ACCESSIBILITY REQUIREMENTS

Economic operators must ensure that the products and services falling within the scope of the EAA meet the accessibility requirements set out in the relevant Annexes. This report reviews the accessibility requirements (Annex I) and illustrative examples (Annex II) provided to guide economic operators in meeting the needs of deaf people. It also identifies gaps and clarifies how these obligations should be applied to ensure meaningful accessibility for deaf users. In practice, most requirements and examples fail to adequately reflect the rights of deaf national sign language users. The absence of specific accessibility provisions for this group may lead economic operators, and the authorities assessing their compliance, to wrongly conclude that certain products and services are accessible to deaf people, when in fact they are not.

Indeed, accessibility for deaf sign language users means access through their national sign language, which is essential for equal communication, access to information, the exercise of their human rights⁸, as well as the exercise of their Union's rights. From early childhood, sign language is vital to ensure deaf people can fully participate in society on an equal basis with hearing

⁸ United Nations Convention on the Rights of Persons with Disabilities, *specif.* articles 9, 21 and 30, **Council Decision 2010/48/EC** of 26 November 2009 concerning the conclusion, by the European Community, of the United Nations Convention on the Rights of Persons with Disabilities (*OJ L 23, 27.1.2010, p. 35–61*).

people. Therefore, information and communication must be available in sign language to the same extent as they are in spoken language for hearing individuals⁹. Relying solely on written text fails to provide equal access, as it does not reflect the linguistic and cognitive experience of deaf national sign language users.

Functional performance criteria (section VII of Annex I)

Before reviewing the specific accessibility requirements for products and services in Annex I, it's important to understand that Annex I, Section VII includes general functional performance criteria. These apply when the detailed requirements do not fully cover certain aspects of design or service delivery. One such criterion states that if a product or service uses sound, it must offer at least one alternative that does not require hearing. While this is helpful, it is open to interpretation by providers as the simplest alternative is written text (e.g. subtitles or transcripts), but for deaf people, the most suitable and equivalent alternative is sign language.

Two examples from Annex II of the EAA illustrate how alternative modes to auditory content, such as subtitles or transcripts, may be insufficient for deaf users:

1. A consumer banking services provider may publish a video online informing customers of significant changes in tariffs or service terms. Although subtitles might be included, they often fail to reflect tone, emphasis, or important context. For deaf national sign language users, especially those who use sign language as their first language, this written content may be unclear or misleading, potentially resulting in misunderstandings about financial obligations or rights.
2. A train company may send a push notification through its mobile application with an audio message informing passengers of a real-time schedule change that affects onward connections. Providing only a written transcript of that message fails to offer the same clarity or urgency. For deaf users, especially in time-sensitive situations, such text may be difficult to process quickly or may omit relevant context, resulting in confusion or missed travel alternatives.

In both cases, written text alone is not an equivalent alternative for deaf people. To ensure full accessibility, the information should be made available in the national sign language of the deaf national sign language user, offering information in a perceivable, understandable, and culturally appropriate way.

⁹ EUD Position Paper on Accessibility of Information and Communication, November 2021, p. 2, available at: <https://eud.eu/eud/position-papers/accessibility-of-information-and-communication/>

Accessibility principles of the Web Accessibility Directive (Recital 47)

Regarding the accessibility of websites and mobile applications provided by economic operators, such as a distributor selling digital devices online, an on-demand audiovisual media service streaming films, or a national train service delivering real-time updates via its app, the EAA requires compliance with the four accessibility principles outlined in Directive 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies (hereafter “Web Accessibility Directive”): perceivability, operability, understandability, and robustness (Recital 47). Those principles find their source in the Web Content Accessibility Guidelines (WCAG).

Each of these principles consists of:

- **Perceivability:** The information and user interface components must be presented in ways that users can perceive. Products and services must present information through multiple sensory channels (i.e. visual and non-auditory formats). For deaf people, this means providing alternatives to auditory formats, such as the use of national sign language.
- **Operability:** user interface components and navigation must be operable by all users. Interfaces must be navigable via more than one method and, for deaf people, for example, video content must include controls for accessing sign language captions.
- **Understandability:** both the information and the functioning of the interface must be comprehensible. The language, structure, and format of information must be clear and predictable. For deaf people, sign language content must be provided as text alternatives are insufficient.
- **Robustness:** the content must be robust enough to be interpreted reliably by a wide range of user agents, such as technological devices and platforms. For example, Total Conversation with sign language provision should function across various devices and platforms to guarantee accessibility for deaf people.

Deaf users must be able not only to perceive the information, often provided only in auditory or written formats, but also to understand it. However, most examples cited by the EAA are limited in scope, focusing on elements such as subtitles in instructional videos for perceivability, or written content presented at a level accessible to individuals with B2-level foreign language

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proficiency for understandability. These examples do not adequately reflect the specific needs of deaf national sign language users. Indeed, deaf people must be provided with information in their national sign languages.

These cross-cutting findings are outlined in the analysis of Sections I to VI of Annex I of the EAA and are illustrated with examples from Annex II, which, however, tend to limit rather than reflect a full understanding of the needs of deaf people. As our focus is on deaf sign language users, we have pre-selected the accessibility requirements most relevant to this group. However, this does not diminish the importance of meeting accessibility requirements for other persons with disabilities, such as hard-of-hearing individuals who rely on voice and/or auditory-based communication and access to information.

Section I: General accessibility requirements for all products, including self-service terminals

- The information on the use of the product (as indicated on the product) and instructions for use (e.g. via a website) (Section I §1(a) and (b)): The information and instructions must be available through more than one mode of sensory communication and this information must be understandable and perceivable. Annex II provides an example for an alternative to instructions: foresee subtitles when video instructions are provided. For deaf people, providing subtitles on a video or a transcript for audio information is not sufficient, the information and instructions must be provided in their national sign language through sign language translation videos.
- Design of the user interface and functionalities (Section I §2):
 - When a product is intended for communication, including interpersonal interaction, operation, control, or navigation, it must be accessible through more than one sensory channel. This includes providing alternatives to visual, auditory, spoken, and tactile elements. Annex II gives an example for hard-of-hearing users, stating that both voice and written instructions should be provided. However, for deaf sign language users, written instructions alone may not be fully accessible. This highlights the need to ensure that products also support access to national sign language. For example, an online banking platform should offer a built-in video chat feature that allows deaf users to connect with a customer service staff person who is fluent in national sign language or with a remote sign language interpreter. This feature should be clearly marked and easily accessible from the homepage or help section, enabling deaf national sign language users to request assistance in their national sign language for tasks such as resetting a password, disputing a transaction, or blocking a lost bank card.

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- When the product uses speech, it must provide alternatives to spoken communication and voice input for communication, control, and navigation. Annex II provides an example for deaf people: in a self-service terminal, text or images must be provided in addition to spoken instructions to enable them to carry out the required action. Since most spoken instructions are programmed, predictable and standardised, it is feasible for economic operators to foresee and provide a corresponding sign language video for each spoken instruction. For example, a national bus transport company operating long-distance routes may have ticket machines that provide spoken information. This can be accompanied not only by on-screen text but also by a selectable sign language icon that triggers short sign language videos for each step, ensuring deaf users can fully understand and complete the process independently.
- When the product uses sound signals to convey information, to indicate an action, to request a response, or to identify an item, it must provide an alternative to those sound signals. Annex II provides an example for deaf people: when a computer emits an error sound, text or image must be displayed indicating the error so that they can understand that an error has occurred. The same suggestion as identified in the previous subparagraph can be applied in this instance: the error sound can be accompanied by a corresponding sign language video to be displayed on the product when it provides a screen and room for videos. For example, on an e-commerce website, if a user submits their payment details incorrectly, triggering an error sound, the platform could display an error message along with an embedded sign language video that clearly explains the issue and guides the user on how to correct the information, ensuring deaf users receive equivalent and understandable feedback.
- Terminal equipment intended for electronic communications services: If the device includes both text and voice functions, it must support Real-Time Text (RTT). Annex II provides an example: a mobile phone must allow RTT conversations so that hard-of-hearing users can exchange information interactively. While this example is accurate, it is somewhat limited, as most mobile phones today are also equipped with video capabilities. Therefore, it is important to clarify to economic operators that an additional requirement applies when their devices offer video functions.
- If the device includes video, text, and voice functions, it must support Total Conversation which consists of synchronised voice, Real-Time Text (RTT), and video with sufficient resolution to enable communication in sign language. Annex II provides a relevant example for deaf users: the device must allow the simultaneous use of video for sign language and text for written messages, enabling two deaf people or a deaf person and a hearing person to communicate. This example appropriately reflects the needs of deaf national sign language users, but it should be further expanded to emphasise the necessity of supporting Total Conversation for the effective use of video relay services, which enable communication between deaf signers and non-signers.

- Terminal equipment intended to access audiovisual media services (AVMS): If the AVMS provider offers accessibility features, the equipment must allow users to access, select, control, customise, and transmit these features to assistive devices. An example from Annex II is provided to the situation of deaf people: the terminal equipment must be equipped to ensure that closed captions are transmitted through the decoder so that they can be used by deaf people. Not only do some deaf people use closed captioning but an increasing proportion of them are using sign language captioning as it is increasingly offered by some on-demand streaming platforms such as Netflix, Disney+ and HBO (a.o. through Picture-in-picture or SignUp Chrome extension). This example should be expanded to ensure the capacity of terminal equipment to transmit sign language captions.
- Support services (including helpdesks, call centres, technical support, relay services, and training services):

When available, these services must provide information about the product's accessibility and its compatibility with assistive technologies, using accessible modes of communication. We deplore the lack of examples in Annex II on this crucial aspect for deaf national sign language users, hence our recommendations for accessibility requirements of support services as follows.

Support services must be accessible to deaf sign language users in at least one of those different ways:

- 1) Through the provision of an in-person professional sign language interpreter in the same space as the support service personnel (agent) and the deaf national sign language user;
- 2) Through the provision of video remote interpreting when the deaf national sign language user is in the same space as the support service personnel (agent) but there is no interpreter physically present, so they call the professional sign language interpreter remotely;
- 3) Through the provision of Video Relay Services when the deaf national sign language user calls the support service personnel (agent) through electronic communications: the economic operator must provide the platform for the calling - it is not up to the deaf person to contact the VRS but to the organisation to reach out to the VRS when receiving the call from the deaf national sign language user on their platform;
- 4) And even better, through the provision of a signing support service personnel (agent) either in-person in the same space as the deaf national sign language user or remotely through Total Conversation.

Section II: Additional accessibility requirements for products excluding self-service terminals:

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- Product packaging: Annex II provides an example indicating that the packaging of a phone must include information on accessibility features for persons with disabilities. We recommend that, where applicable, product packaging clearly specifies the accessibility features relevant to deaf national sign language users. This should include, in particular, a QR code linking to an online video in national sign language that provides further explanation of these features.
- Installation, maintenance, storage, and disposal instructions, available via a website or other medium: the content must meet similar standards, i.e. accessible through more than one sensory channel, understandable, perceivable, of appropriate size and format, and offered in text formats compatible with assistive technologies. In Annex II, no example was provided for deaf people but the provision of instructions in an online video in national sign language is more than recommended.

Section III: General accessibility requirements for all services:

- When products are used as part of their services, those products must comply with Section I and, where applicable, Section II. Service providers must also give information about how the services work, the products used, and their accessibility. This information must be accessible through multiple sensory channels, understandable, perceivable, of suitable size and format, and provided in text formats compatible with assistive technologies. The example used in Annex II is to include closed captions when explanatory videos are provided. However, as mentioned above, this is not sufficient for deaf national sign language users. So, the information and instructions must be provided in their national sign language through sign language translation videos.
- Websites and mobile services, including mobile applications, must be accessible in line with the four accessibility principles: perceivable, operable, understandable, and robust. While no specific example is provided in Annex II regarding deaf people's accessibility needs, it is important to remind that websites and mobile services, including mobile applications, must be accessible in their national sign languages.
- Support services must provide information about the accessibility of the service, its compatibility with assistive technologies, and ensure that this information is delivered through "accessible communication modes". We deplore the lack of examples in Annex II on this crucial aspect for deaf national sign language users, hence our recommendations for accessibility requirements of support services as follows.

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Support services must be accessible to deaf national sign language users in at least one of those different ways:

- 1) Through the provision of an in-person professional sign language interpreter in the same space as the support service personnel (agent) and the deaf sign language user;
- 2) Through the provision of video remote interpreting when the deaf national sign language user is in the same space as the support service personnel (agent) but there is no interpreter physically present, so they call the professional sign language interpreter remotely;
- 3) Through the provision of Video Relay Services when the deaf national sign language user calls the support service personnel (agent) through electronic communications: the economic operator must provide the platform for the calling. It is not up to the deaf person to contact the VRS but to the organisation to reach out to the VRS when receiving the call from the deaf sign language user on their platform;
- 4) And even better, through the provision of a signing support service personnel (agent) either in-person in the same space as the deaf national sign language user or remotely through Total Conversation.

Section IV: Additional accessibility requirements for certain services:

- Services providing access to audiovisual media services (AVMS) must ensure that AVMS accessibility components, such as closed captions (STT), audio description, spoken subtitles, and sign language interpretation, are fully transmitted, with sufficient quality, proper synchronisation, and user control over their display and usage. The Annex II provides an example relevant to deaf people: allow the selection, customisation, and display of access services such as closed captions for deaf users and sign language interpretation, with visibility levels equivalent to the main media controls. This example adequately addresses the accessibility needs of deaf sign language users.
- Passenger transport services (air, bus, rail, or waterborne) that are provided at the national level (excluding urban, suburban, and regional services), must provide information on accessibility, smart ticketing, real-time travel updates, and additional services (e.g. staff availability at stations, lift outages, etc.). For deaf people, this information must be made available in national sign language, not only through online videos on websites and mobile applications or videos displayed on-site, but also through staff proficient in sign language and the availability of in-person or remote sign language interpretation during interactions with staff.
- Consumer banking services must provide identification methods, electronic signatures, and secure payment services that are perceivable, operable, understandable, and robust, and

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the information must be understandable at a B2 level, in line with the Common European Framework of Reference for Languages. However, this level of written language is not sufficient for most deaf sign language users. Customer banking services must be made accessible in national sign language through various means, including sign language-proficient staff, video relay services, remote interpreting services, and sign language videos. Furthermore, as outlined in the chapter on the “State of Play,” deaf people continue to face major barriers in accessing banking services, particularly in situations involving security-sensitive procedures.

- E-commerce services must provide information on the accessibility of products and services (if offered by the operator), as well as the accessibility of features such as identification, security, and payment when these are an integral part of the service. For deaf users, this includes ensuring that such information is available in national sign language, for example through sign language videos, accessible customer support via video relay services, and interfaces that support visual and signed communication.

Annex I also includes Section V, which sets out specific accessibility requirements concerning the handling of emergency communications to the single European emergency number ‘112’ by the most appropriate Public Safety Answering Point (PSAP). However, this section and its corresponding obligations under the EAA have already been thoroughly analysed in our separate report on the implementation of the European Electronic Communications Code (EECC)¹⁰.

Throughout the analysis, it becomes clear that many of the accessibility examples cited in Annex II, such as the provision of written instructions or closed captions, are helpful but not sufficient for ensuring equal access for deaf national sign language users. Written content does not provide full linguistic access for all deaf people, especially those with limited written language proficiency. Moreover, the lack of examples and obligations referring explicitly to national sign language communication, whether through in-person or remote interpretation, video relay services, or signing staff, risks leaving deaf users excluded from essential services and everyday interactions. To ensure that their products and services are accessible to deaf sign language users, economic operators must go beyond the accessibility requirements set out in Annex I (Recital 90) and the minimum examples in Annex II and the relevant authorities must adopt measures that guarantee access to information and communication in national sign languages. This includes embedding sign language videos in digital products and websites, providing sign language interpretation (in-person, remotely, or via relay services), supporting Total

¹⁰ EECC report: <https://eud.eu/euds-report-on-the-implementation-of-the-european-electronic-communications-code/>

Conversation, and ensuring that customer support services are staffed or supported by sign language-competent personnel.

Moreover, we recommend that the European Commission make full use of its power to adopt delegated acts to supplement Annex I of the EAA, as provided under Articles 4(9) and 26. These delegated acts are intended to further detail accessibility requirements which, due to their complexity or general nature, cannot achieve their full effect without additional legal specification. Based on our consultation with EUD members in May 2025, it became evident that many economic operators have not taken sufficient steps to comply with accessibility requirements regarding access to information and communication for deaf national sign language users. It is therefore essential that the Commission develops such a delegated act in close cooperation with organisations of persons with disabilities (OPDs), such as the European Union of the Deaf.

STANDARDS

The European Commission has mandated European standardisation organisations to develop voluntary harmonised standards. Once these are finalised, the Commission will evaluate whether they align with the requirements set out in the EAA and if it is the case, they will become harmonised at EU level and apply across all Member States. The European Union of the Deaf is actively contributing to this process through the European Disability Forum and strongly urge the European Commission to ensure that the voice of the European disability movement is included in the development of these standards (Recital 77). This is essential to ensure they reflect the accessibility requirements outlined in the EAA.

However, we consider that the current mandated standards and technical specifications fail to adequately address one of the key challenges faced by deaf people in accessing electronic communications when contacting economic operators and their customer service departments. In our report on the impact of the European Electronic Communications Code (EECC), we highlighted significant disparities in the provision of video relay services across Member States. These disparities, relating to availability, quality, and interoperability, create barriers for economic operators in delivering accessible support services to deaf users. The same concern applies to accessible emergency communications, particularly the requirement to answer emergency calls made to the single European emergency number '112', as further detailed in our EECC implementation report. We therefore urge the European Commission to take these findings into account and enforce the obligation on Member States to provide 24/7 video relay services. Moreover, we recommend the European Commission to prioritise the harmonisation

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of a European standard on relay services. The European standard ES 202 975 v2.1.1 (2015), currently under revision by ETSI, is expected to provide comprehensive and detailed technical requirements for video relay services and should be finalised by the second half of 2026. Its adoption would be a crucial step toward ensuring effective EAA implementation for deaf national sign language users across the EU.

Moreover, the forthcoming harmonised European standards, particularly the revised EN 301 549 and the new European standard on support services currently under development, must also fully incorporate the needs of sign language users. However, as the accessibility of information addressed in the standard EN 301 549 is primarily based on the WCAG 2.2 level AA criteria, which focus on web content accessibility, it currently does not include explicit requirements for sign language provision and accessibility in the ICT products and services. Product and service providers should, however, be obliged to ensure a minimum level of sign language provision when the information is vital, highly relevant, or required to be understood by deaf national sign language users. This highlights the urgent need to address this gap to ensure that they are not left behind in the digital accessibility framework.

Finally, we recommend the European Commission to accelerate the implementation of accessibility standards in the Member States, especially the European harmonised standards on support services, emergency number 112, and accessibility of ICT, as recommended by the Committee on the Rights of Persons with Disabilities¹¹.

Furthermore, to streamline compliance checks, the Commission has introduced a simplified conformity assessment process, in the form of an EU declaration of conformity (Art. 15 and 16). However, it is the responsibility of national market surveillance authorities to monitor and verify compliance. We call on the European Commission and Member States to ensure that these authorities are sufficiently resourced, trained, and empowered to carry out their duties effectively. This includes the capacity to assess compliance with accessibility requirements in a way that addresses the diverse needs of persons with disabilities, including deaf national sign language users.

LACK OF ACCESSIBLE ENFORCEMENT PROCEDURES

In addition to inaccessible products and services, deaf people face further barriers in filing complaints and enforcing their rights under the EAA. Economic operators often fail to provide accessible means, such as national sign language options, for consumers to submit grievances. Even where formal complaint procedures exist, they are rarely designed with sign language accessibility in mind. Moreover, market surveillance authorities, tasked with monitoring compliance and investigating complaints, frequently lack the capacity or procedures to ensure

¹¹ Committee on the Rights of Persons with Disabilities, Concluding observations on the combined second and third periodic reports of the European Union, CRPD/C/EU/CO/2-3, §27(b).

accessibility for deaf complainants. The following part will examine these enforcement and complaint-related barriers and propose clear recommendations for ensuring that both economic operators and responsible authorities comply with the letter and spirit of the EAA in relation to deaf sign language users.

Single contact point:

In addition to the accessibility of support services that economic operators must ensure, manufacturers and importers of products are required to provide a single contact point for end-users, including deaf people, and to ensure that the contact details are communicated in a language easily understood by them (Art. 7(6) and 9(4)). However, in practice, most contact points remain inaccessible to deaf users, as they typically rely on phone numbers, chatbots, or email, modes that do not accommodate the needs of sign language users. To ensure equal access, manufacturers and importers must offer alternative communication methods beyond voice or written channels. This includes providing remote sign language interpretation (e.g. via video relay services), ensuring the availability of staff proficient in sign language, and enabling online video communication that fully supports Total Conversation.

Surveillance on the compliance of the product or service:

Economic operators must inform the relevant authorities when they have relied on the EAA provisions concerning fundamental alteration and/or disproportionate burden. However, they are not required to submit a copy of their assessment unless specifically requested by the authorities (Recital 68). Member States must ensure that competent authorities verify compliance with the EAA, in particular by applying the criteria set out in Annex VI when monitoring product accessibility (Recital 87).

Consumers, including deaf people, have the right to request information from these authorities regarding the product's or service's compliance with the EAA, including the operator's justification for invoking a disproportionate burden or fundamental alteration clause. Such information must be made available in an accessible format (Art. 19(3) and Art. 23(2)). However, the EAA does not define what constitutes an "accessible format", leaving flexibility and potential inconsistency in how Member States implement this obligation.

Authorities conducting market surveillance must also examine whether the economic operator's conformity assessment has been carried out appropriately, including the justification for invoking any exemptions. Crucially, these duties must be performed in cooperation with persons with disabilities and their representative organisations (Recital 80).

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Specifically, national authorities must establish meaningful consultation processes with deaf persons and their representative organisations to ensure that assessments, communications, and enforcement mechanisms are informed by their lived experience and linguistic and cultural needs. Such engagement is essential to ensure that accessibility standards reflect the realities of deaf sign language users and that rights enshrined in the EAA are effectively implemented and enforced.

Enforcement (Art. 29)

Since harmonised standards are voluntary, suppliers and other businesses are not obliged to apply them, but they must still comply with the binding accessibility requirements of the EAA. Even when an economic operator claims to be in conformity with the EAA or applicable standards, it may still be subject to complaints submitted by persons with disabilities or their representative organisations to national market surveillance authorities. Deaf people and their representative organisations have the right to initiate judicial or administrative procedures before courts or competent authorities (Art. 29§2(b)). Member States may impose sanctions in response, including fines, legal action, penalties, or restrictions on market access.

The role of consumers, including deaf people, in monitoring and following up on EAA compliance will therefore be essential. Member States must ensure that complaint and enforcement mechanisms are fully accessible to deaf people. Currently, many deaf people face substantial barriers in being informed of their rights, recognising accessibility failures, identifying the appropriate authority, filing complaints, and following up on proceedings. Ensuring accessibility in these mechanisms, including through national sign language, accessible communication channels, and deaf-aware staff, is critical to making the enforcement of the EAA effective and inclusive.

To address this, national authorities must provide accessible complaint procedures, including clear information in national sign languages, sign language-accessible communication channels (e.g. video relay services), and support from staff trained to interact with deaf sign language users. Without these measures, deaf people will remain excluded from enforcing their rights under the EAA, and economic operators will continue to avoid full compliance without consequence. An inclusive and accessible enforcement system is therefore not only a legal obligation but also essential for the effectiveness of the EAA.

European Commission's Working Group (Art. 28)

Despite the clear obligation under Article 28 of the EAA and Recital 96, the European Commission has yet to establish the mandated working group consisting of market surveillance authorities,

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service compliance authorities, and relevant stakeholders, including representatives of persons with disabilities and their organisations. This working group is meant to support coherent implementation of the EAA, encourage exchange of best practices, and provide expert advice. However, as of June 2025, the European Union of the Deaf (EUD) has not been systematically consulted in the EAA implementation process. This absence undermines the very objectives of the Directive and contradicts the principle of involvement of persons with disabilities, as enshrined in Article 4(3) of the UNCRPD. We urge the European Commission to facilitate the access of the European organisations of persons with disabilities, including the EUD, in this working group without further delay as the EAA has been rolled out since 28 June 2025 and our findings revealed a need to rectify, strengthen and clarify some measures and accessibility requirements to secure consistent and effective enforcement of the EAA for deaf people.

RECOMMENDATIONS

EUD recommends the EU to:

- Closely monitor the implementation of the EAA across all Member States by ensuring that specific accessibility measures for deaf national sign language users are effectively addressed in all relevant areas covered by the EAA. Furthermore, we urge the adoption of a delegated act to clarify the assessment criteria for determining the benefits for deaf sign language users and how these should be balanced against potential costs, which economic operators may invoke to claim a disproportionate burden and seek exemption from compliance.
- Expand the scope of application of the European Accessibility Act in other relevant accessibility legislation instruments to ensure accessibility in other areas such as audiovisual media services, healthcare, built environment, justice, among others.
- Make full use of its powers under Articles 4(9) and 26 of the EAA to adopt delegated acts that supplement Annex I with detailed accessibility requirements, ensuring that access to information and communication for deaf national sign language users is effectively implemented across all relevant products and services. This should be done in close consultation with organisations of persons with disabilities, including the European Union of the Deaf.
- Enforce the obligation for Member States to ensure the provision of 24/7 high-quality, interoperable video relay services (VRS) in national sign languages, and in parallel, prioritise the harmonisation of a European standard for relay services by supporting and promoting the adoption of the ETSI standard ES 202 975, currently under revision.
- Support Member States in strengthening their market surveillance frameworks by providing guidance, training tools, and coordination mechanisms that promote consistent and effective enforcement across the EU, with particular attention to the accessibility needs of deaf national sign language users.

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- Promptly guarantee that the working group mandated under Article 28 of the EAA, ensures the participation of representative organisations of persons with disabilities, including the European Union of the Deaf (EUD), in order to ensure coherent implementation and expert guidance from representatives of deaf national sign language users.
- Monitor the accessibility of national enforcement mechanisms and provide guidance to ensure that deaf people can fully participate in complaint procedures. This includes promoting the use of national sign languages in official communications, encouraging the development of deaf-aware procedures, and supporting Member States in meeting their obligations under Article 29(2)(b) of the EAA.

EUD recommends the Member States to:

- Adopt national legislation or measures that go beyond the minimum requirements of the EAA and ensure comprehensive accessibility for deaf people, including in sectors not currently covered by the EAA, such as healthcare, employment, transport, and audiovisual media services, particularly through the provision of sign language access and video relay services.
- Ensure that national authorities effectively monitor and enforce compliance by economic operators with their national legislation implementing the EAA. This includes requiring providers of products and services to guarantee access to information and communication for deaf national sign language users. Such measures should include the integration of national sign language videos in digital interfaces, the provision of professional national sign language interpretation (in-person, remote, or via video relay services), support for and provision of Total Conversation, and the availability of customer support services that are either staffed or supported by personnel competent in national sign languages.
- Ensure the provision of 24/7 high-quality, interoperable video relay services (VRS) in national sign languages, so that general customer service interactions between deaf people and economic operators are accessible, timely, and equivalent in quality to those available to non-deaf users.
- Ensure that national market surveillance authorities are adequately resourced, trained, and empowered to monitor and verify compliance with accessibility requirements under the EAA. This includes equipping them with the expertise necessary to assess whether products and services effectively meet the communication needs of persons with disabilities, particularly deaf people.
- Establish structured and meaningful consultation processes with deaf people and their representative organisations when assessing, implementing, and enforcing accessibility requirements. This engagement must be ongoing and ensure that national measures reflect the lived experiences, linguistic rights, and cultural needs of deaf people.

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- Ensure that complaint and enforcement mechanisms related to the EAA are fully accessible to deaf people. This includes providing information in national sign languages, offering accessible communication channels such as video relay services, and ensuring that staff are trained to interact effectively with deaf sign language users.

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