



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

Summarised version

In 2019, the European Commission adopted European Accessibility Act, or EAA, (Directive 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services) The 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.

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 EAA. The purpose of this report is to assess the effects of the implementation of the EAA among 1 million deaf people who are national sign language users and living in the European Union and the EEA. The report identifies the shortcomings of the EAA as well as provides recommendations to strengthen its implementation for deaf people. This report is timely published as the European Accessibility Act obligations are applicable as of 28 June 2025. Our recommendations aim to ensure the full accessibility of products and services for deaf national sign language users through the provision of information and communication in national sign language.

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

President: Sofia Isari – Executive Director: Frankie Picron
European Union of the Deaf – Rue de la Loi/Wetstraat 26/15 – 1040 Brussels – Belgium
www.eud.eu

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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 the 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.
- 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.

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- 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.
- 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.