


Overview of the European Accessibility Act 2025 in Ireland

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The European Accessibility Act (EAA) has been implemented into Irish Law through the European Union (Accessibility Requirements of Product and Services) Regulations 2023 (the Regulations) and will come into effect from 28 June 2025 (Commencement Date).

What is the European Accessibility Act?

The EAA sets down baseline requirements for the following products and services, ensuring they are accessible to people with disabilities:

Products covered by the EEA include:

- Computer hardware and related operating systems,
- Payment terminals,
- Self-service terminals like ATM's
- Devices used to access telecoms and media content (mobile phones and e-readers).

Services covered by the EEA include:

- Making phone calls, text messages, video messages, and emails,
- Popular video content service providers such as Netflix,
- Services you can access through the internet on your computer or phone, like social media, news sites, or apps,
- Various services banks offer to individuals, like checking accounts, savings accounts, loans, or online banking;
- Buying and selling goods or services over the internet, like shopping on websites such as Amazon or eBay.

European Accessibility Act 2025 requirements

The EAA will apply to public and private sector businesses/organisations who are responsible for a product or service such as those set out above. This includes service providers and manufacturers of products (or their authorized representatives, importers, or distributors).

The EAA mandates that products must offer multi-sensory information (e.g. audio and visual outputs) and instructions as well as obligations relating to the design and functionalities (of user interfaces).

These changes are designed to ensure that products and services are accessible to persons with disabilities. The Regulations emphasise the importance of designing products with people with disabilities in mind.

Competent Authorities

The EAA has set out the competent authorities tasked with overseeing adherence to the Regulations. These designated authorities for services under the Regulations vary based on the type of service. The Competition and Consumer Protection Commission (CCPC) will serve as the market surveillance authority for products governed by the Regulations, whereas Coimisiún na Meán will oversee services that offer access to audio-visual media services.

European Accessibility Act penalties

Designing UX and creating products and software that are inclusive by design may involve upfront costs in the design phase. Inclusive design may lead to a more well-rounded and engaging product.

Those who fail to comply with the EAA's obligations, then possible punishments include possible summary convictions, or fines (not exceeding €5,000), imprisonment for up to six months, or both. For a conviction on indictment, the penalties can escalate to a fine of up to €60,000, or imprisonment for a term not exceeding 18 months, or both.

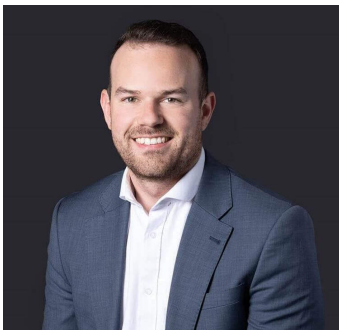
It is with other EU regulations, company directors and officers can be held personally liable for non-compliance.

Exceptions

Interestingly, the EAA will allow for certain exceptions to timelines. The EAA allow service providers an extra five years (up until 28 June 2030), to provide their services using products which were lawful up until the Commencement Date of this act. In order for a business to be granted this exception they must carry out a documented assessment demonstrating that compliance to the Regulations would (a) require a significant change in a product or service concerned that the results in the fundamental alteration of its basic nature or (b) compliance would result in disproportionate burden on the business/organisation concerned.

As well as this service contracts that had been agreed before the Commencement Date may continue without any alteration until they expire, however this can be no longer than five years. The Regulations also allow for self-service terminals such as ATMs which are used lawfully before the Commencement Date, this will be until the end of their economically useful life, but no longer than twenty years.

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