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EFHOH
EUROPEAN FEDERATION OF HARD OF
HEARING PEOPLE

European Accessibility Act: *from consultation to implementation* *a Hard of Hearing perspective*

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ABOUT EFHOH

The European Federation of Hard of Hearing People (EFHOH), established in 1993, is a non-profit organization representing hard of hearing and late-deafened individuals across Europe. EFHOH advocates for awareness and practical actions to eliminate barriers to access affordable hearing care and rehabilitation and create an accessible society through public services and assistive technologies.

Its main objective is to protect and promote the rights of individuals with hearing loss in Europe, facilitating legislative and social protections through collaboration with members and stakeholders.

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EXECUTIVE SUMMARY

This report provides a cross-country overview of how the European Accessibility Act (EAA) is currently in force, following the national transposition deadline on **28 June 2025**, with a specific focus on accessibility for people with hearing loss. Alongside the comparative findings, it offers an introduction to the EAA and outlines why the Directive is relevant for the rights of hard of hearing people.

The implementation of the EAA must reflect the rights and needs of hard of hearing people to ensure equal access to public information and essential digital services. Hard of hearing individuals have mild to severe hearing loss but often use spoken language to communicate and rely on assistive devices like hearing aids or cochlear implants. The hard of hearing community can also benefit from visual cues, like lipreading and speech-to-text tools, to facilitate communication. Deafened people, conversely, have lost their hearing after having acquired spoken language, and rely on a combination of spoken language, assistive devices, and visual cues to communicate.

The analysis brings together the experiences, expectations, and concerns of national hard of hearing organisations across Europe as they evaluate progress in key public service areas such as banking, emergency communication, websites, and digital platforms.

It aims to reflect insights into how the EAA has been incorporated into national law, how effectively implementation is progressing in practice, the extent to which countries are going beyond the minimum requirements, and where gaps or delays continue to hinder accessibility for hard of hearing people.

While the EAA has strong potential to transform accessibility across Europe, developments since the transposition deadline show limited visible progress. Key findings include:

- **Awareness of the EAA remains uneven and often limited.** Communication from authorities and service providers is inconsistent.
- **National implementation varies significantly.** Some countries have implemented the EAA into national legislation, while others are in early preparatory stages with unclear enforcement mechanisms.
- **Hearing access requirements are frequently overlooked.** Captioning, real-time text, visual alerts, and clear communication pathways receive little attention in national guidance.
- **Organisations are only partially involved in consultations.** Many respondents reported minimal or no engagement from national authorities.
- **Few improvements are visible since 28 June 2025.** Accessibility of banking, emergency communications (112), public websites, and digital platforms shows limited change.

By collecting national insights from our member organisations, this document supports a shared understanding of progress and challenges as implementation advances, highlighting the need for strengthened monitoring, clearer guidance, and proactive engagement with the hard of hearing community to ensure that the EAA achieves its intended impact.

METHODOLOGY

This report is based on the *EFHOH European Accessibility Act Survey on Public Services*, distributed to our member organisations between November and early December 2025 to collect information on:

- the level of awareness and progress regarding national EAA implementation;
- the accessibility of public services most relevant to hard of hearing people;
- members' expectations, concerns, and insights regarding upcoming EAA deadlines and national-level enforcement mechanisms.

A total of **18 responses** were collected from organisations representing **14 European countries**: Austria, Czech Republic, Finland, Georgia, Germany, Iceland, Malta, the Netherlands, Norway, Poland, Portugal, Slovenia, Spain and Sweden.



Beyond capturing the current state of implementation, the survey also aimed to help EFHOH better understand where members may require additional support in their national advocacy efforts as the EAA moves to national transposition and practical enforcement.

WHAT THE EAA MEANS FOR HARD OF HEARING PEOPLE

As of **28 June 2025**, the **European Accessibility Act (EAA)** is legally binding across the European Union. Officially known as Directive (EU) 2019/882, this landmark law harmonizes accessibility requirements for key digital and physical products and services to improve the accessibility of disabled people to goods and services in the EU.

At its core, the Act reflects the EU's commitment to the **UN Convention on the Rights of Persons with Disabilities (CRPD)**, where accessibility is recognised as a fundamental precondition for equality and participation.

The Directive sets general accessibility requirements and specific rules for packaging, instructions, user interfaces, and support services. For instance, websites and apps must follow the **Web Content Accessibility Guidelines 2.1**; devices like smartphones must support features such as screen readers; and self-service terminals must provide accessible interfaces.

Rather than prescribing how to meet these requirements, the EAA defines what must be accessible, complementing existing EU laws without changing sector-specific accessibility rules.

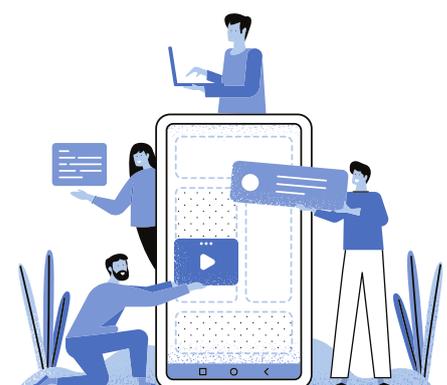
Who must comply?

The EAA applies to economic operators offering certain products and services to consumers on the EU market, including:

- Manufacturers, importers, and distributors.
- Service providers, including telecommunications, banks, audiovisual media, e-commerce, and transport companies.

What is covered?

- **Products:** smartphones, tablets, laptops, desktop computers, smart TVs, ATMs, ticketing machines, e-readers, card readers, and payment terminals.
- **Services:** access to audiovisual media, telecommunications (phone and internet), e-commerce, digital banking, e-books, emergency services, and transport-related apps and services.



Some critical sectors like healthcare, education, and housing are not included in the scope. Also, for local transport, the requirements are limited only to interactive self-service terminals.

Why it matters for Hard of Hearing people

The EAA contains several key accessibility requirements that directly benefit hard of hearing people:

- Services or products used to access audiovisual content must offer subtitles tailored for hard of hearing people as part of the requirement to communicate via more than one sensory channel. They also must ensure compatibility with assistive technology.

While the **Audiovisual Media Services Directive** provides accessibility obligations on audiovisual content for broadcasters and on-demand platforms, the EAA applies to the services and devices used to access that content.

- Products and services must be **compatible with assistive technologies**, including **hearing aids, cochlear implants** and **real-time text**.
- **Websites and mobile apps** must follow the four principles of accessibility: perceivable, operable, understandable, and robust. It means, for example, making sure that for any audio content a non-audio alternative is provided (e.g. subtitles), that there are alternatives for voice-based services, voice command or voice-based authentication methods, and that volume can be adjusted.
- **Customer service and helpdesks** must provide information on the accessibility of the product or service and its compatibility with assistive technologies.
- **Online banking services**, as well as other services, must present information in text-based formats.
- Instruction manuals, packaging, and safety information must be **understandable, perceivable**, and offered in **alternative accessible formats**, such as text-based communication. **Emergency communication through 112** must address the needs of hard of hearing people, by responding using an adequate communication channel, and using synchronised text in voice communication.

These measures aim to close persistent digital access gaps for hard of hearing users, but only if implemented effectively and enforced consistently across Member States.

The role of national action

The EAA introduces phased obligations. Member States were required to transpose the Directive into national law by 28 June 2022, meaning that national legislation had to be in place by that date. The obligations for economic operators and service providers entered into force on 28 June 2025. From this application date, all products placed on the market for the first time must comply with the EAA's accessibility requirements, while existing products used in service delivery benefit from transitional periods.

Member States may also delay accessibility for emergency communications (112) until 28 June 2027 and allow existing self-service terminals to remain in use until the end of their economic life no later than 28 June 2045. However, these extended deadlines risk postponing real improvements for hard of hearing people in crucial areas like safety and daily accessibility.

Notable good practice: Spain provides a strong example of national-level action on the European Accessibility Act. Through **Ley 11/2023**, adopted in May 2023, Spain has transposed the EAA into binding national law, setting clear and enforceable accessibility requirements for products and services.

The law aligns with **EN 301 549** and **WCAG 2.1 AA**, covering digital platforms, websites, banking services, e-commerce, ticketing systems, and more. It includes provisions for market surveillance, complaint mechanisms, and penalties of up to €600,000 for non-compliance. While the built environment remains outside the EAA's binding scope, Spain's model shows how Member States can go beyond minimum standards to deliver effective enforcement and real impact.

KEY FINDINGS FROM OUR SURVEY

The findings presented below reflect the input of hard of hearing organisations in 14 European countries. Each subsection begins with a brief analytical focus, outlining what the survey aimed to assess, followed by the corresponding cross-country findings.

1. National Implementation of the European Accessibility Act

The first part of the survey examined the extent to which national authorities have introduced legislation or regulatory measures to implement the European Accessibility Act, and whether these measures address aspects relevant to hearing accessibility. The objective was to assess overall national readiness and identify whether hearing access is reflected within legal frameworks.

Findings

Across the 14 participating countries, national implementation of the EAA shows wide variation. Most countries indicated that some form of national transposition has taken place: **11 of the 14 countries** reported that national rules have already been introduced, although the degree of alignment with EAA requirements, the effectiveness and the clarity of obligations vary considerably.

Only a few, most notably **Austria** and **Slovenia**, referred to the formal adoption of national laws transposing the EAA. Austria has incorporated the Directive into its legal framework, while Slovenia relies on the *Act on the Accessibility of Products and Services (Zakon o dostopnosti do proizvodov in storitev)* as its main transposition instrument.

Question: *Do you know if your country has already introduced national laws or rules to implement the EAA?*



Accordingly, awareness of the EAA among public authorities and service providers also remains limited. Only five countries (36%)—**Finland, Slovenia, Malta, Sweden and Austria**—reported a clear understanding of the Directive, while nine countries (43%) indicated only partial awareness, often restricted to specific sectors such as digital public services or banking (**Germany, the Netherlands, Spain, Portugal, Iceland, Czech Republic, Norway, Poland and Georgia**). The remaining four countries (21%) noted low or no awareness, with authorities not actively communicating about the EAA or issuing guidance.

Question: *Do you think public authorities and service providers (banks, transport, public websites, etc.) in your country are aware of the EAA obligations?*



A similar pattern emerges regarding national guidelines or resources to support implementation. Only 3 countries out of 14 (**21%**), such as **Finland, Sweden and Slovenia**, reported the existence of dedicated guidance for manufacturers or service providers. 7 countries out of 14 (**50%**) described partial or unclear awareness of available materials, often featured by fragmented information rather than EAA-specific support (**Germany, the Netherlands, Spain, Portugal, Iceland, Austria and Malta**). Overall, these findings reveal uneven institutional preparedness and underline the risk of inconsistent or delayed implementation.

2. Built Environment and Hearing Access: the critical gap

To understand whether countries are moving beyond the minimum obligations of the EAA, the survey examined whether national legislation includes requirements for the built environment and hearing access. The aim was to identify where governments are extending accessibility obligations into physical spaces, which is crucial for hard of hearing people who rely on acoustics, visual information and assistive listening systems.

Findings

Across the 14 responding countries, approaches to incorporating the built environment into national EAA implementation remain inconsistent.

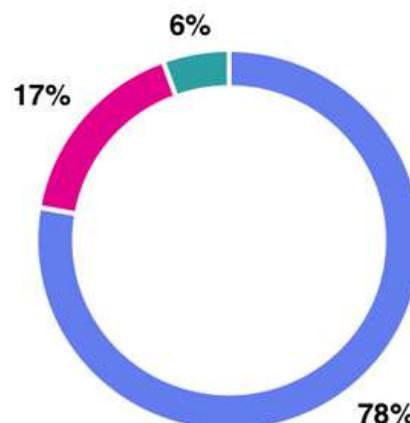
Only 4 out of the 14 responding countries have introduced measures that address accessibility of physical spaces, which often tend to be general obligations rather than requirements specifically focusing on hearing access.

In several countries, such as **Portugal, the Netherlands, Germany, and the Czech Republic**, no provisions were reported to support hearing accessibility in public buildings, while other countries, including Spain, Norway, Iceland, and Georgia, reported that national authorities have not yet developed or communicated any strategy in this area.

Conversely, **Sweden** has established national requirements for the accessibility of the built environment, many of which support hard of hearing people. Under the Planning and Building Act (2010:900), and the technical regulations issued by Boverket, new public buildings and major renovations must consider acoustics, lighting, clear visual information, and the use of assistive listening systems where appropriate. This framework is reinforced by the Discrimination Act (2008:567), which recognises inadequate accessibility as a form of discrimination and requires service providers, employers and public authorities to take measures to ensure their environments are usable by people with disabilities.

Question: *To implement EAA, has your country introduced national laws that include accessibility of the built environment, especially regarding hearing access (e.g. hearing loops)?*

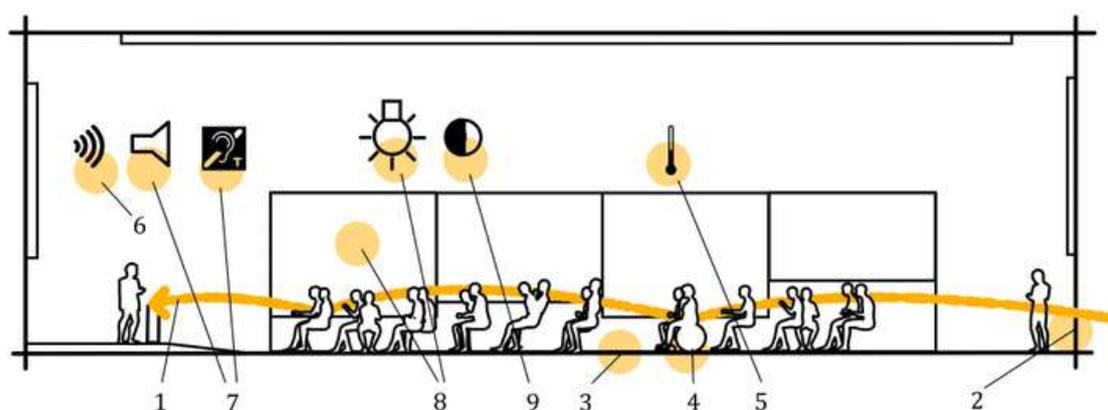
● Yes	6
● No	5
● It hasn't been implemented	7



While the EAA does not impose uniform requirements for the built environment, it allows Member States to choose whether to apply their existing national rules or the EAA-specific criteria set out in **Annex I**. This means that unless national legislation is updated or aligned with EAA standards, accessibility gaps may persist in physical spaces.

Annex I of the EAA outlines accessibility features for buildings where covered digital services are provided, such as retail branches offering e-banking or transport stations with ticketing kiosks. These features ensure that users can have access to the digital products and services that the EAA includes in its scope.

The **EN 17210:2021 standard** offers concrete guidance for accessible physical environments by defining harmonized requirements for assistive listening systems, sound quality, appropriate lighting and visual emergency systems.



EFHOH encourages governments, public procurement, and designers to adopt *EN 17210* as a standard baseline, particularly in schools, service counters, transportation, and cultural venues. For a practical overview, see [EFHOH's explainer on EN 17210](#). The standard is currently under revision via Mandate 587 to better align with the European Accessibility Act. Without aligning national laws and public infrastructure with these standards, hard of hearing people remain excluded from fully benefiting from everyday services.

3. Multiple Communication Channels in Public Services

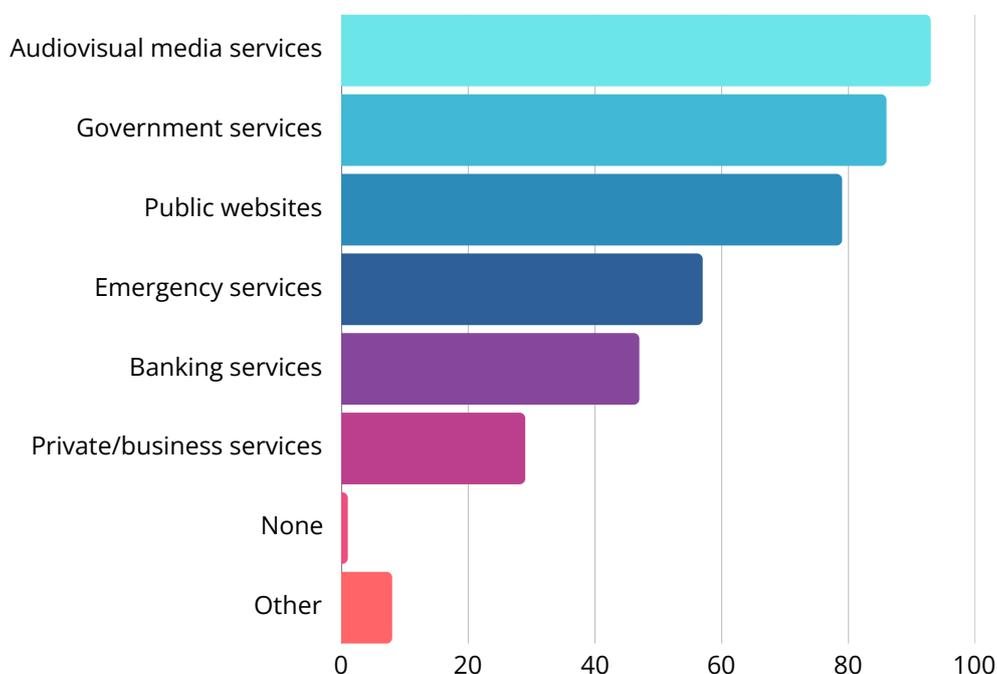
This part of the survey assessed which public service areas provide non-voice communication options for hard of hearing people, such as email, text-based platforms or online contact systems. The aim was to identify existing alternatives to telephone-based communication and highlight gaps across sectors.

Findings

Access to communication, the cornerstone for hard of hearing people inclusion varies significantly between countries, with some public services offering multiple ways to interact beyond telephone-based contact, while others remain predominantly audio-dependent. When comparing countries, the services most frequently reported as offering alternative communication channels include:

- **Audiovisual media services** in **13 out of 14 countries (93%),**
- **Government services** in **12 countries (86%),**
- **Public websites** in **11 countries (79%),**
- **Emergency services** in **8 countries (57%),**
- **Banking services** in **6 countries (43%),**
- **Private or business services** in **4 countries (29%).**

Question: *In your country, which public services provide multiple ways to communicate for hard of hearing people?
 (Other ways than telephone/audio only)*



The availability of non-voice communication channels varies significantly across the 14 countries examined. Several countries, particularly **Finland, Slovenia, the Netherlands, Germany, and Spain**, indicated that a range of public services now offer written or digital alternatives to telephone-based contact. These include public websites and government services, which were the most reported, followed by audiovisual media services, emergency services, and, in some cases, banking and private service providers.

The alternatives described may take the form of **email, online forms, chat functions, web-based enquiry systems, or other text-based tools**. Under the “Other” field, respondents clarified that, even where non-voice communication options exist, they are not applied consistently. Some services still rely exclusively on telephone contact, availability varies widely across sectors, and AI-chatbots or automated systems often create barriers for hard of hearing users.

Among the countries surveyed, it appears that **Georgia** is the only country that does not provide alternative communication channels beyond telephone-based contact, indicating a critical gap in accessibility.

4. Involvement of Hard of Hearing Organisations

This section explored whether hard of hearing organisations have been invited to participate in EAA-related consultations, preparatory discussions or awareness activities. The aim was to evaluate the degree of stakeholder engagement and understand the extent to which national implementation processes incorporate the expertise of hard of hearing communities.

Findings

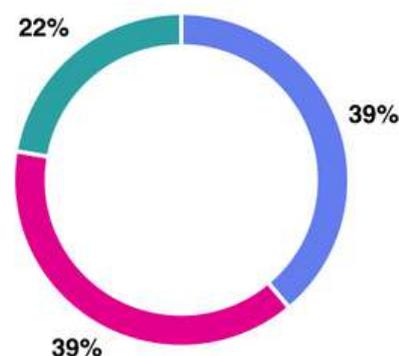
The involvement of hard of hearing organisations in EAA-related processes also varies significantly across countries. In almost half of the countries, organisations reported no participation in consultations, no engagement from ministries, and in some cases no formal process through which they could contribute.

This was the case, for example, in **Austria, Spain, Iceland, Norway, Poland, Portugal, Georgia, and Germany**, where respondents stated that authorities either have not initiated discussions or have only engaged other disability groups without a hearing-loss focus.

The remaining countries, such as **Slovenia, the Netherlands, Finland, Malta, Sweden, and the Czech Republic**, described some degree of involvement, ranging from invitations to specific meetings to participation in AccessibleEU activities or submission of comments on draft measures. Even in these cases, however, consultations were often described as isolated or informal, rather than part of a structured process ensuring that the needs of hard of hearing people are addressed throughout the implementation cycle.

Question: *Has your organisation been involved in EAA-related activities (for example: implementation into national law, consultations, awareness events, meetings with equality bodies)?*

● Yes	7
● No	7
● It hasn't been implemented	4



A cross-cutting issue is that in countries where general accessibility policies exist, hearing access is often misunderstood and treated as an afterthought. As a result, many national discussions do not consider the specific requirements of captioning, real-time text, acoustic design, or assistive technologies. This limited and uneven involvement restricts hard of hearing organisations' ability to influence national interpretation of EAA obligations and contributes to gaps in implementation identified.

5. Improvements observed since June 2025

This section assessed whether respondents had observed improvements in the accessibility of public and private services for hard of hearing people since the EAA's main application date of 28 June 2025. The intention was to capture early indications of practical change.

Findings

Initial developments following the June 2025 enforcement of the European Accessibility Act have been limited. Only a few countries reported improvements of any kind, and these were generally small-scale or linked to pre-existing national initiatives rather than coordinated EAA implementation.

Gradual progress was noted in **Slovenia**, where increased attention to captioning and speech-to-text services has led to visible improvements in some digital and media services. In **Austria**, isolated improvements were reported among individual companies that voluntarily upgraded accessibility features.

In **Spain**, certain enhancements were attributed to regional accessibility legislation rather than to the EAA itself. **Finland** reported gradual increases in subtitling availability, as digital service providers are already accustomed to complying with the **Web Accessibility Directive** and its **WCAG-based requirements**.

By contrast, most countries, including **Portugal, Norway, Poland, Georgia, Iceland, Germany, Sweden, and the Netherlands**, reported **no measurable improvements** since June 2025. Accessibility barriers in public services, banking, emergency communication, and digital platforms remain largely unchanged.

Question: *Have you seen improvements to hard of hearing experience of engaging with public and private services since the EAA has been enforced on 28 June 2025?*



Taken together, these early observations suggest that **the EAA has not yet resulted in tangible improvements** for hard of hearing people, and that observed positive developments are often unrelated to the Directive itself. More time, clearer national guidance, and targeted implementation measures appear necessary before meaningful change becomes evident.

CALL TO ACTION

Since EFHOH's early advocacy, the EAA has become binding EU law, with clear obligations and phased deadlines. Yet some of the original concerns raised by EFHOH remain relevant today, such as built environment accessibility, microenterprise exemptions, and crucial areas like accommodation and local transport not covered in the EAA's scope.

We urge national governments to **strengthen built environment accessibility by aligning national legislation with the needs of hard of hearing people**. While the EAA's built environment provisions are limited in scope, Member States can go further by adopting and enforcing standards that reflect a wider range of accessibility needs, especially wherever EAA-covered services are delivered.

We call for the **creation of a European Accessibility Agency to strengthen monitoring** and close the persistent gap between legislation and lived experience. Effective implementation requires robust oversight as well as **systematic participation of organisations for hard of hearing people**, whose expertise is essential to identifying barriers and building practical solutions in monitoring the implementation of the EAA.

Businesses and service providers must embed hearing accessibility from the outset by **involving hard of hearing users in product development, testing, and service design**. This includes ensuring compatibility with hearing assistive technologies, offering real-time text and written communication options, and integrating assistive listening systems in physical spaces.

National legislators must ensure that **multiple communication channels are available** across all public services, moving beyond telephone-only contact. This includes ensuring that emergency services (112), banking, and other essential services provide accessible text-based options as part of EAA implementation. In particular, the implementation of Real-Time Text (RTT) and Total Conversation is crucial to guarantee accessible emergency communication for hard of hearing people.

Although not part of the survey findings, we also call for strengthening **accessible telecommunications**, including mandatory real-time text, reliable captioned phone services, and universal access to text- and relay-based communication, so that hard of hearing people can communicate independently and safely across all digital and telephony services.

EFHOH and its members stand ready to support this work by sharing user insights, participating in co-design processes, and advising on accessibility standards for hard of hearing people.

What can national Hard of Hearing Organisations do?

- Push their government for shorter implementation timelines in areas where delays threaten the safety of hard of hearing people, such as inaccessible emergency communications (112).
- Make sure accessible emergency communication is implemented as soon as possible, and make sure to open up for cross-border solutions.
- Engage with national decision-makers such as ministries, regulators, companies and public buyers, and build coalitions with other disability and consumer organizations.

- Work with competent authorities for services to ensure compliance and submit complaints where requirements are not met.
- Check which accessibility laws apply in the country and understand how national frameworks implement the EAA.
- Seek clear national guidance for service providers and advocating for mandatory hearing-access standards in the built environment

EFHOH is supporting its members in taking action towards their national authorities with knowledge-sharing and joint advocacy.

National organisations of hard of hearing people have a crucial role in ensuring that hearing accessibility is fully embedded in national legislation and rigorously monitored in practice.

EU-27 National Focal Points for EAA Implementation

Austria: Federal Office for Social Affairs (Sozialministeriumservice)

Belgium: FPS Economy, BIPT and regional agencies

Bulgaria: Various national agencies

Croatia: Ministry of Labour, Pension System, Family and Social Policy

Cyprus: To be designated.

Czech Republic: Czech Trade Inspection Authority (ČOI)

Denmark: National market surveillance authority

ANNEX: Survey questions on EAA and Public Services

1- Are you aware of the European Accessibility Act (EAA) and its main goals?

2- Do you know if your country has already introduced national laws or rules to implement the EAA?

3- To implement EAA, has your country introduced national laws that include accessibility of the built environment, especially regarding hearing access (e.g. hearing loops)?

4- Has your organisation been involved in EAA-related activities (for example: implementation into national law, consultations, awareness events, meetings with equality bodies)?

5- Do you think public authorities and service providers (banks, transport, public websites, etc.) in your country are aware of the EAA obligations?

6- In your country, is there clear information available for consumers on accessibility rights and how to make a complaint?

7- In your country, which public services provide multiple ways to communicate for hard of hearing people? (Other ways than telephone/audio only)

8- Are you aware of any national guidelines or resources to help manufacturers, importers, distributors and services providers implement the EAA?

9- Have you seen improvements to hard of hearing experience of engaging with public and private services since the EAA has been enforced on 28 June 2025?

10- What type of support would you like from EFHOH to help you promote or monitor the EAA in your country?

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