



## European Accessibility Act (EAA)

### ■ Why does it matter to intermediaries?

The European Accessibility Act (EAA) aims to improve the accessibility of products and services for people with disabilities within the EU. This Directive is part of a wider initiative at European level regarding the inclusivity of all consumers in the internal market, called the EU Disability Strategy, aimed at including goals for digital inclusion, mobility and independent living. The EAA covers various products and services, including, in particular, consumer banking services and e-commerce.

According to the EEA, “**E-commerce services**” are “*services provided at a distance, through websites and mobile device-based services by electronic means and at the individual request of a consumer with a view to concluding a consumer contract*”. Recital 43 of the Act states that: “*The e-commerce services accessibility obligations of this Directive should apply to the online sale of **any product or service** and should therefore also apply to the sale of a product or service covered in its own right under this Directive.*”

**Consumer banking services** are defined quite broadly as the following banking and financial services:

“*Consumer banking services*” means the provision to consumers of the following banking and financial services:

- a) credit agreements covered by Directive 2008/48/EC of the European Parliament and of the Council or Directive 2014/17/EU of the European Parliament and of the Council (**CCD** and **MCD**).
- b) Services as defined in points 1, 2, 4 and 5 in Section A and points 1, 2, 4 and 5 in Section B of Annex I to Directive 2014/65/EU of the European Parliament and of the Council;”
- Section A (**MiFID II**);
- **Investment advice**.

**The EAA does not refer to any EU text on insurance (such as the IDD). The sale/distribution of insurance products is not covered by the concept of consumer banking services. Investment advice under MiFID II is covered explicitly, be it online or in person.**

The EAA states that microenterprises (employing fewer than 10 persons and which has an annual turnover not exceeding €2 million or an annual balance sheet total not exceeding €2 million) providing services shall be exempt from complying with the accessibility requirements and any obligations relating to the compliance with those requirements.

### ■ State of play

The **EAA was adopted and published in 2019** and had to be implemented into national law by 28 June 2022. National law implementing the Accessibility Act must become **applicable by June 2025**. The EAA is a minimum harmonisation Directive, meaning Member States can go beyond. By June 2030, the transition period will end for services using products that were in use before 2025 (date of transposition).

BIPAR believes that the scope of the Directive leaves room for interpretation: insurance products/services, when provided/distributed online, could be considered in the scope of the Directive. However, another reading is also possible: it can be considered that the EAA applies to the online sale of any product or service covered as such by the Directive, then the online sale of insurance products would not be covered because insurance services /products do not fall as such under the Directive (see definition of banking services above).

The concept of service is also interesting in this context: in order to define the concept of **service**, the Directive refers to the definition of service provided for in **Directive 2006/123 of 12 December 2006 on services in the internal market**, namely “*any self-employed economic activity normally carried out for remuneration*”. **However, financial services (including those relating to insurance and reinsurance) are explicitly excluded from the scope of Directive 2006/123.**

It is also interesting to note that banking services are explicitly referred to in the EAA, whereas they are also excluded from the scope of Directive 2006/123. In May 2025, BIPAR carried out a short survey with its members regarding the transposition of the EAA. For many Member States, insurance intermediaries fall in the scope of the EAA when they offer E-commerce services. BIPAR will continue to monitor the implementation of the EAA.

### ■ Next steps

- **28 June 2025**: Application date of the national rules.
- **28 June 2030**: Transition period ends for services using products that were lawfully in use before the enforcement date.
- **28 June 2045**: Latest date for using self-service terminals that were in use before the enforcement date.

### ■ Links

- [Accessibility Act](#)
- [EU Disability Strategy](#)
- [Directive 2006/123 on services in the internal market](#)
- [Accessibility standards at European level](#)
- [Accessibility legislation at European level](#)