ACI EUROPE
AIRPORTS COUNCIL INTERNATIONAL

European Airports and the European Accessibility Act (EAA)



May 2025

Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, also known as the **European Accessibility Act (EAA)**, is a directive that aims to improve the functioning of the internal market for accessible products and services, by removing barriers created by divergent rules in Member States.

The European accessibility act covers products and services that have been identified as being most important for persons with disabilities, while being most likely to have diverging accessibility requirements across EU countries. These products and services include:

- computers and operating systems
- **ATMs, ticketing and check-in machines**
- smartphones
- TV equipment related to digital television services
- telephony services and related equipment
- access to audio-visual media services such as television broadcasts and related consumer equipment
- **services related to air, bus, rail and waterborne passenger transport**
- banking services
- e-books
- e-commerce

I. Deadlines

The Directive sets several key deadlines related to the accessibility requirements for products and services across the EU:

1. **Transposition**
   - **Deadline: 28 June 2022**
   - **Requirement**: Member States had adopted and published the laws, regulations and administrative provisions necessary to comply with the directive.

2. **Application of national measures**
   - **Deadline: 28 June 2025**
   - **Requirement**: The national measures transposing the directive must start applying from this date. Products and services placed on the market or provided after this date must comply with the accessibility requirements.

3. **Transitional period for products already in the market**

    - **Deadline: Until 28 June 2030**
    - **Requirement**: Products that were placed on the market **before 28 June 2025** and do not comply with the directive may continue to be made available on the market **until 28 June 2030**. This serves as a **transitional period**.

4. **Transitional measures for Self-Service Terminals**

    - **Deadline: End of their economically useful life, with a maximum of 20 years**
    - **Requirement:** Self-service terminals placed on the market **before 28 June 2025** and not compliant with the directive can continue to be used **until the end of their economically useful life**, with a maximum of 20 years.
    - **Please note that Article 32 establishes that** *"Member States may provide that self-service terminals lawfully used by service providers for the provision of services before 28 June 2025 may continue to be used in the provision of similar services until the end of their economically useful life, but no longer than 20 years after they enter into use"*. The directive does not specify whether these dates refer to the purchase, installation or effective use.

II. Obligations for transport operators

Under **Directive (EU) 2019/882 (European Accessibility Act), transport operators**—particularly providers of **passenger transport services**—are required to implement certain accessibility measures, but the directive **does not regulate the physical accessibility of transport vehicles**, which remains under **Regulation (EU) No 1300/2014** and national laws.

However, the directive **does apply to related digital services**, and **transport service providers** must ensure the **accessibility of digital information and ticketing services** by **28 June 2025**.

Key **measures** include notably the accessibility of:

- Websites
- Mobile device-based services, including mobile applications
- Electronic tickets and electronic ticketing services
- Delivery of transport service information, including real-time travel information; this shall regard information screens, be

limited to interactive screens located within the territory of the Union and

- Interactive self-service terminals located within nth territory of the union, except those installed as integrated parts of vehicles, aircraft, ships and rolling stock used in the provision of any part of such passenger transport services.

Other elements included in the scope:

- Built environment (optional for Member States)
- Public procurement for products, services, and infrastructure
- EU acts containing accessibility obligations (presumption of compliance)

Definitions:

- "Air passenger transport services", Article 2 of Regulation 1107/2006 (PRM)

Detailed accessibility obligations for transport operators

Annex I

Section III – General Accessibility Requirements

The provision of services to maximise their foreseeable use by persons with disabilities shall be achieved by:

a. ensuring the accessibility of the products used in the provision of the service, in accordance with Section I of this Annex and, where applicable, Section II thereof;

b. providing information about the functioning of the service, and where products are used in the provision of the service, its link to these products as well as information about their accessibility characteristics and interoperability with assistive devices and facilities:

   i. making the information available via more than one sensory channel;
   ii. presenting the information in an understandable way;
   iii. presenting the information to users in ways they can perceive;
   iv. making the information content available in text formats that can be used to generate alternative assistive formats to be presented in different ways by the users and via more than one sensory channel;
   v. presenting in fonts of adequate size and suitable shape, taking into account foreseeable conditions of use and using sufficient contrast, as well as adjustable spacing between

letters, lines and paragraphs;

vi. supplementing any non-textual content with an alternative presentation of that content; and

vii. providing electronic information needed in the provision of the service consistently and adequately by making it perceivable, operable, understandable and robust;

c. making websites, including the related online applications, and mobile device-based services, including mobile applications, accessible in a consistent and adequate way by making them perceivable, operable, understandable and robust;

d. where available, support services (help desks, call centres, technical support, relay services and training services) provide information on the accessibility of the service and its compatibility with assistive technologies, in accessible modes of communication.

Section IV - Additional accessibility requirements

The provision of services in order to maximise their foreseeable use by persons with disabilities shall be achieved by including functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with disabilities and ensure interoperability with assistive technologies:

c. Air, bus, rail and waterborne passenger transport services except for urban and suburban transport services and regional transport services:

i. ensuring the provision of information on the accessibility of vehicles, the surrounding infrastructure and the built environment and on assistance for persons with disabilities;

ii. ensuring the provision of information about smart ticketing (electronic reservations, ticket booking, etc.), real-time travel information (timetables, traffic disruptions, connecting services, onward travel with other transport modes, etc.), and additional service information (e.g., staffing of stations, lifts that are out of order, or services that are temporarily unavailable).

iii. ensuring access to the content, the navigation of the file content and layout, including dynamic layout, the provision of the structure, flexibility and choice in the presentation of the content;

iv. allowing alternative renditions of the content and its interoperability with a variety of assistive technologies, in such a way that it is perceivable, understandable, operable and robust;

v. making them discoverable by providing information through metadata about their accessibility features;

vi. ensuring that digital rights management measures do not block accessibility features.

Annex III

Accessibility requirements concerning the built environment where the services under the scope of the Directive are provided

In order to maximise the foreseeable use in an independent manner by persons with disabilities of the built environment in which a service is provided and which is under the responsibility of the service provider, as referred to in Article 4(4), the accessibility of areas intended for public access shall include the following aspects:

a. use of related outdoor areas and facilities;
b. approaches to buildings;
c. use of entrances;
d. use of paths in horizontal circulation;
e. use of paths in vertical circulation;
f. use of rooms by the public;
g. use of equipment and facilities used in the provision of the service;
h. use of toilets and sanitary facilities;
i. use of exits, evacuation routes and concepts for emergency planning;
j. communication and orientation via more than one sensory channel;
k. use of facilities and buildings for their foreseeable purpose;
l. protection from hazards in the environment indoors and outdoors.

III. Compliance checklist for airport managing bodies

1. Transposition of the Directive into national law

- ☐ Directive transposed.
- ☐ Directive communicated to the airport managing body.
- ☐ Content discussed with enforcement body (please note that the enforcement body will not necessarily be in charge of transport, as the Directive refers to all sorts of products and services).

2. Digital interfaces (Websites and Mobile Applications)

- ☐ Airport website and mobile apps are perceivable, operable, understandable, and robust.
- ☐ Flight information, services, and maps are accessible with text alternatives.
- ☐ Content is navigable via keyboard and assistive technologies.
- ☐ Information is presented in a logical, hierarchical format.

- ☐ Visual information (e.g., gate numbers, signage) is supported by accessible digital alternatives.
- ☐ Contrast, font size, and colour meet accessibility standards (WCAG 2.1 AA).
- ☐ Video and multimedia content includes captions and/or audio description.

3. Self-service terminals

- ☐ Online check-in platforms and airport-managed ticket counters are accessible.
- ☐ Self-service kiosks and baggage drop systems meet accessibility standards.
- ☐ Confirmation messages and error alerts are provided in accessible formats.
- ☐ Boarding passes and confirmations are compatible with assistive technologies.

4. Real-time travel information

- ☐ Flight status, gate changes, and boarding announcements are accessible via digital platforms.
- ☐ Wayfinding tools and indoor navigation apps are accessible.
- ☐ Disruption alerts and safety announcements are available in multiple accessible formats.
- ☐ Public announcement systems are supplemented with visual and/or digital displays.

5. Obligations for the provision of services

- ☐ Ensure that all services falling under the EAA scope are accessible to persons with disabilities, including relevant digital services and interfaces.
- ☐ Apply the accessibility requirements established in the annexes of Directive (EU). 2019/882 to the provision of services, especially in terms of interoperability, support services, and accessible information.
- ☐ Ensure all related products used in service provision meet accessibility requirements.

6. Customer support and information

- ☐ Accessibility-related information (e.g., assistance services, accessible routes) is clearly provided.
- ☐ Contact methods for accessibility support are accessible (e.g., TTY, chat, email).
- ☐ Staff instructions and help services are presented in accessible digital formats.
- ☐ Assistance request processes are easily understandable and digitally accessible.

7. Feedback and complaints mechanism (when applicable)

- ☐ Accessible digital forms for lodging complaints or suggestions.
- ☐ Multiple methods for feedback, including accessible in-person and online options.
- ☐ Follow-up communication is provided in formats suitable for users with disabilities.

8. Procurement of ICT services and products

- ☐ Accessibility requirements are integrated into ICT procurement for terminals and kiosks.
- ☐ All contracts with digital solution providers include EAA compliance clauses.
- ☐ Vendors supply conformance documentation and accessibility testing records.

9. Declaration in terms and conditions

- ☐ Include clear statements in terms and conditions confirming service accessibility compliance with Directive (EU) 2019/882.
- ☐ Provide information to end users on how services are accessible and how they support the use of assistive technologies.
- ☐ Make this information available prior to the conclusion of service contracts, using accessible formats.

10. Documentation and monitoring

- ☐ Regular audits of digital systems for accessibility compliance.
- ☐ Accessibility training for airport staff managing digital services.
- ☐ Continuous updates to digital systems in line with accessibility standards.
- ☐ Maintain records for inspection by national surveillance authorities.

ACI EUROPE is the European region of Airports Council International (ACI), the only worldwide professional association of airport operators. ACI EUROPE represents over **600 airports** in **55 European countries**. Our members facilitate over **95% of commercial air traffic** in Europe. Air transport supports **14 million jobs**, generating **€851 billion** in European economic activity (**5% of GDP**). In response to the Climate Emergency, in June 2019 our members committed to achieving Net Zero carbon emissions for operations under their control by 2050, without offsetting.

EVERY FLIGHT BEGINS AT THE AIRPORT.

For more information, please contact:
Federico Bonaudi
Director of Facilitation, Parliamentary Affairs & Regional Airports
federico.bonaudi@aci-europe.org

www.aci-europe.org
ACI EUROPE



© Copyright ACI EUROPE 2025.