

## The European Accessibility Act FAQ



### Preparing for the EAA: Essential Guidance for Publishers

Accessibility is not just a regulatory requirement—it's a commitment to inclusivity and broader audience engagement. With the June 2025 compliance deadline, planning for the European Accessibility Act (EAA) is critical. KGL has compiled the most frequently asked questions (FAQs) we have received about the directive.

*The information provided in this document is for general informational purposes only and is not intended as legal advice. While KGL strives to provide accurate and up-to-date guidance, publishers are encouraged to consult with legal professionals or compliance experts to address specific legal obligations under the EAA.*

#### European Accessibility Act (EAA) Overview

##### What is the definition of “accessibility” under the EAA?

Accessibility refers to the design of environments, products, and services that can be used by all people, including those with disabilities. In the context of digital content and technology, accessibility ensures that websites, applications, and digital documents are usable by individuals with a wide range of abilities. The Web Content Accessibility Guidelines (WCAG) provide a comprehensive framework for making digital content accessible, based on four core accessibility principles: Perceivability, Operability, Understandability, and Robustness.

##### Are non-EU-based publishers subject to fines for EAA violations if they sell in the EU?

Yes, publishers selling products or services in the EU must comply with the EAA, regardless of their location. Non-compliance can result in fines enforced by EU member states.

##### Is there a grace period for getting backlist eBooks up to EAA standards? If we cannot make older eBooks compliant in time for the deadline, would they need to be removed from sale?

As of now, there does not appear to be a blanket grace period for backlist eBooks under the EAA. Any eBooks sold in the EU (including backlist titles) after June 2025 must comply with EAA standards. Publishers unable to make older titles compliant may need to temporarily or permanently remove them from sale in the EU to avoid penalties.

##### Are niche publishers with annual sales under a certain amount required to comply with the EAA?

The EAA includes provisions that exempt small businesses. Companies with fewer than 10 employees or annual revenues below €2 million (approximately US\$2.2 million or £1.66 million) are generally not required to comply. That said, even exempt publishers are encouraged to adopt accessibility practices to enhance their brand reputation, broaden audiences, and to promote inclusivity, making your content more impactful and marketable.

#### Compliance for Digital Content

##### If a publisher provides the same content in PDF, EPUB, and/or full-text HTML, must all formats be made accessible or is it sufficient to focus on one?

From speaking to our customers and industry experts, our understanding is that the provision of at least one compliant format for any content (such as accessible full-text HTML, ePub, or PDF), is sufficient for the purposes of EAA compliance. Publishers are required to include an accessibility statement on their website specifying which formats are accessible.

##### Does the EAA apply to self-publishing platforms like Amazon?

Yes, self-published books sold in the EU, including through Kindle Direct Publishing (KDP), must comply with EAA requirements.

### Are Open Access books required to be accessible under the EAA?

Yes, the EAA applies to all digital content, including Open Access books, whether sold for profit or offered for free.

### Does the EAA impact eLearning platforms and EdTech companies?

Yes, the EAA directly impacts eLearning platforms and EdTech companies. The EAA requires all digital products and services, including eLearning platforms, be accessible to individuals with various abilities.

### Does the responsibility lie with publishers to block the purchase of non-accessible products in the EU, rather than with libraries or professors using older textbooks?

Yes, under the EAA, publishers and distributors bear the responsibility for ensuring compliance. If any online bookstore sells non-accessible books to EU customers, you could be held accountable for non-compliance. To mitigate this, you may need to ensure all products meet EAA standards or restrict purchases from the EU for non-compliant items.

## Websites, Platforms, and Metadata

### Do websites need to comply with the EAA?

Yes, websites, mobile apps, and e-commerce platforms offering products or services in the EU must comply with the EAA to ensure accessibility for all users.

### Does the EAA affect submission and production systems that authors might interact with?

The EAA applies to web content, and that includes public-facing user interface of publishing systems. KGL is actively working on making all our platforms compliant.

### Who is responsible for adding accessibility codes to ONIX metadata?

The responsibility for adding accessibility codes to ONIX metadata primarily falls on the publisher. ONIX metadata ensures that information regarding a product's accessibility features is communicated throughout the supply chain. Online bookstores and other intermediaries use this metadata to inform customers about accessibility features of the product.

## Addressing Specific Content Types

### Do accessibility requirements apply to conference proceedings or journals?

Conference proceedings published as digital documents or e-books must comply with the EAA, including providing accessible formats like tagged PDFs or structured XML.

With regard to journals, again without providing legal advice, it is our understanding and the understanding of some of our larger publishers that journals are not currently part of the focus of the EAA. However, the direction of travel, including the April 2026 enforcement of Title II of the Americans with Disabilities Act, suggests that publishers of any content type consider accessibility as core to their production process and delivery formats.

### What steps are needed for video accessibility?

Videos must include captions, transcripts, and audio descriptions to meet accessibility standards.

### How should complex images be handled for accessibility?

In addition to short alt text descriptions, long descriptions should be provided for images that convey substantial or complex information. Color contrast and font size recommendations provided in WCAG should be adhered to as well.

## Practical Considerations and Vendor Support

### Is it worthwhile for publishers to pursue Benetech Global Certified Accessible (GCA) certification?

Yes, achieving Benetech GCA certification demonstrates a commitment to accessibility and ensures compliance with recognized standards. KGL is a GCA-certified vendor and can provide guidance on certification.

### How can small publishers or journals meet the EAA requirements?

KGL offers tailored accessibility solutions for publishers of all sizes, helping them navigate the requirements and implement compliance measures effectively.

### What are the cost implications of making books accessible?

Costs depend on content complexity and required features. Integrating accessibility early in the process (especially at authoring) significantly reduces costs. Please contact KGL for an estimate.



KGL, a **Benetech Global Certified Accessible** conversion vendor, is a champion of digital equality. For further resources and guidance on accessibility standards and compliance for journals, books, digital media, websites, eLearning, and more, visit [kwglobal.com/accessibility](https://kwglobal.com/accessibility) or email us at [accessibility@kwglobal.com](mailto:accessibility@kwglobal.com).