

EAA & BFSG 2026: meeting the duty

In force since 28 June 2025; transition for existing services until 2030. Benchmark: WCAG via EN 301 549 (V3.2.1 = 2.1 AA, V4.1.1 = 2.2 AA, expected 2026). Fines up to 100,000 €. One page, clear steps.

Scope the obligation

1. **Classify the offering**shops, booking, banking, ticketing, telecoms, audiovisual media or e-books fall under the act; pure information sites do not.
2. **Check the micro exemption**fewer than 10 staff and turnover or balance up to 2 M EUR exempts services, not products.
3. **Run the EAA self-check**four questions, no sign-up: web-creativo.es/en/tools.
4. **Mind the deadlines**28 June 2025 for new products and services, transition until 2030 for existing services. Less time than it looks.

Fix it in code (not in an overlay)

1. **Pick the benchmark**build to WCAG 2.2 AA via EN 301 549, since 2.2 fully includes 2.1.
2. **Audit deeply**manual testing with screen reader and keyboard, automated tools only as a complement.
3. **Check contrast and focus**minimum 4.5:1 contrast, a visible focus ring on every interactive element.
4. **Ensure keyboard operation**every function reachable without a mouse, no traps in the tab order.
5. **Forms and errors**labelled fields, clear error messages, required fields marked.
6. **Avoid overlay widgets**legally contested, rarely produce real conformance and offer no protection in claims.

Document and maintain

1. **Publish an accessibility statement**date, standard tested, feedback channel and responsible party.
2. **Re-test after every relaunch**accessibility is not a one-off; check again after releases and updates.
3. **Take the legal risk seriously**competitors and associations actively monitor sites; documented conformance is the best defence.
4. **Plan early**late retrofits under pressure cost far more than building it right from the start.

This checklist is a first technical orientation. It does not replace legal advice. A lawyer must do the legal assessment.