

Proposal for next steps after ERPB technical workshop on accessibility to retail payments

1. Introduction

The European Accessibility Act (EAA) will apply in all member states as of June 2025. Its requirements will affect consumer banking including payment services and their providers (PSPs) as well. Amongst others, the EAA aims at ensuring that the consumer banking services are accessible for persons with disabilities and that the sector, including intermediaries and technical suppliers, will harmonise the accessibility of those services. In this context, the ERPB held a technical workshop on 11 October 2024 to provide information about the upcoming EEA requirements in more details and to explain how existing technical standards could help support compliance with the EEA accessibility requirements. The workshop further set the ground for discussing compliance efforts supported by the use of the European standard EN 301 549 “Accessibility requirements for ICT products and services” as a *common* standard.¹

This note provides a basis for discussing potential follow-up actions at ERPB level. It first considers the use of the current version of EN 301 549 while a formal harmonised standard is being developed upon the European Commission’s request so that it can provide presumption of conformity with the EAA. Secondly, the note sets out additional potential avenues for the ERPB, facilitating the implementation of EAA requirements.

2. Common use of standard EN 301 549

The standard EN 301 549 is a European standard for digital accessibility in the European Union, defining requirements that digital products should meet to enable their use by people with disabilities. It already acts as a harmonised standard providing presumption of conformity to the Web Accessibility Directive

¹ It is important to note that the EAA contains not only accessibility requirements related to ICT but also accessibility requirements related for example to non-digital information, built environment and support services that are affecting the consumer banking services in the EAA. To support those requirements, other standards are being developed or revised under the European Commission standardisation request M587. Those forthcoming standards will also provide presumption of conformity with the directive.

(WAD). Following the European Commission's request, it is currently under revision to also provide presumption of conformity to the EAA on the accessibility requirements for products and services. The revision is delayed and expected to be finalised by 15 March 2026². While the current version of that standard does not yet provide presumption of conformity for the EAA it can still support implementing EAA requirements such as those relevant for digital retail payments services and products, as it can be expected that many provisions remain. However, until a reference to the standard is published in the Official Journal of the European Union, presumably in 2026, PSPs will have to explain how they comply and cannot refer to the standard when declaring compliance.

The advantage of following this standard will be that it provides a safer and faster way to comply rather than trying to comply via own measures. Moreover, EN standards are regularly updated in a centralised way to adapt to changing requirements. Users of EN 301 549 who are members of the European Standardisation Organisations (ESOs) are thereby always informed about changes and are provided with an immediate solution at the same time.

In addition, the compliance with the EAA accessibility requirements by following the standard commonly, i.e., across the payments industry (and beyond) would help to avoid fragmentation, thereby facilitating interoperability. Compliance with the EAA requirements would also lower the need for additional investments for special support services, serving specific user groups – thereby possibly saving money for the PSPs.

It should be reminded that standards might be only the minimum common denominator. Investing in accessibility measures that go beyond minimum requirements can be seen as a business opportunity, as they can help reaching a significant part of the population by providing tailor-made innovative and easier solutions. In the EU, 27% of the population have disabilities, potentially benefiting from those advanced services.

In view of the obligations of the EAA and the expected benefits of the forthcoming harmonised version EN 301 549 across the payments industry it is suggested to agree on its use as a common standard for digital retail payments services and products across the EU to get presumption of conformity.

3. Facilitating implementation of EN 301 549

At the current stage, it is not clear where payment stakeholders stand with the implementation of the EAA for their own services and products, and to what extent harmonised implementation can be further facilitated at ERPB level, beyond the clarification that the workshop provided. Most likely, preparation levels vary between stakeholders, likely also between countries due to different national transpositions. It can be assumed that some form of preparation has started for most entities in view of the deadline being June next year.

The presenters of the ERPB workshop on accessibility to retail payments provided already some guidance on how to approach the implementation process, e.g., by pointing to Annex E of the EN 301 549 (guidance for users of the document) as a starting point of the implementation, and to Chapter 4 as the most important part³. Moreover, the [Accessible EU centre](#) and its support services for the implementation process were presented, among which guidelines on European legislation on accessibility in EU languages.

² The banking sector's participation in the revision of the standard would be important to ensure that their views are considered in the process.

³ Once the revised version is accepted by the European Commission and its reference published in the Official Journal.

The presenters also provided explanations to questions raised at and after the workshop.

As potential follow-up action, it could be considered if - in addition to the above - further guidance, best practices, or general support with a specific focus on implementation aspects for retail payment services and products would be useful. More concretely, a group of interested PSPs could reach out to accessibility experts of the Accessible EU centre or the [Funka Foundation](#), and the European Commission to explore how the implementation process for retail payments services and products could be supported in a collaborative way between PSPs and these organisations. The outcome of this, e.g., best practices, could be published on the ERPB page of the ECB website, together with the Q&A prepared after the ERPB workshop.

This would provide a forum to PSPs for exchanging on experiences or challenges with implementation of the EAA and the harmonised version of the EN 301 549 when available. In addition to relevant ERPB stakeholder associations reaching out to their membership in this regard, the ERPB Secretariat could also liaise with national payment committees to ensure a broad reach of this initiative. If there are PSPs that are already complying with the accessibility requirements of the EAA or use the EN 301 549 standard, the forum may be a place to share examples of good practices.

In addition, national payment councils could possibly play a role by raising awareness of PSPs in their communities on the EAA obligations and implementation and providing a forum for exchange, thereby supporting that PSPs are prepared on time.

The ERPB is invited to

- ***follow the standard EN 301 549, where applicable, for preparing compliance with the EAA as of June 2025,***
- ***agree to use the forthcoming harmonised standard EN 301 549, once referenced and published in the Official Journal, as a common standard for implementing the EAA requirements to digital retail payments services and products, to get presumption of conformity,***
- ***share views on proposed follow-up actions facilitating the implementation process by PSPs.***