

The European Accessibility Act (EAA) in effect: market developments and AFM expectations

In short This second edition in the AFM's EAA update series provides examples of financial e-commerce services, highlights the reporting obligation for institutions, and shares insights from an exploratory study conducted by the AFM.

The European Accessibility Act (EAA) has been in force since June 28, 2025. The AFM sees that the market is evolving: many financial institutions have already taken steps to improve the accessibility of their services. At the same time, it is clear that further action is needed to ensure full compliance with the directive, so that people with disabilities can independently access and use financial services.

In 2026, we expect institutions to adopt a proactive approach: report non-compliance, indicate what steps you are taking, and structurally embed accessibility in your organisation. After all, accessibility is not only a legal obligation, but also an integral part of serving the interests of your customers. In this second EAA update, we provide examples of financial e-commerce services and call on institutions to assess whether they fall under the scope of the EAA as a provider of banking services and/or financial e-commerce services. We also discuss the submission of notifications by companies and share insights from our exploratory study into the implementation of the EAA. Finally, we outline the AFM's supervisory activities.

The EAA update series is intended for all companies that must comply with the directive. Each update focuses on one or more specific themes. Where possible, we respond to signals from the market. We expect to publish a new EAA update in early 2026. You will receive it if you are subscribed to [the monthly newsletter](#) for the sector.

1. Assess whether you need to comply

The EAA has a broad scope. Providers of banking services and financial e-commerce services to consumers are among those required to comply. Examples of financial e-commerce services that fall under the EAA include:

- Crypto platforms offering electronic money;
- Online insurance providers;
- Crowdfunding platforms;
- Online advisory and intermediary services for financial products;
- Management companies;
- Providers of investment objects.

This list is not exhaustive. The AFM expects companies to assess whether their services qualify as banking and/or financial e-commerce services under the EAA. We encourage all companies to make their services accessible, even if they are not legally required to do so.

2. Reporting obligation for financial institutions

As of the EAA's entry into force, financial institutions are required to report non-conformities to the AFM. This means that institutions must notify the AFM if they do not comply with the accessibility requirements of the EAA (non-compliance), or invoke an exemption, such as disproportionate burden. Notifications must be submitted via the [AFM Portal](#).

In your first report following the EAA's entry into force, you may combine multiple instances of non-conformity into a single notification. These can be grouped by level of impact. If there are new incidents of non-compliance afterwards, you must submit new notifications for these incidents.

The AFM distinguishes four levels of impact on consumers: critical, significant, moderate, and minor. Accessibility problems that have a critical or significant impact on consumers must be reported to the AFM within one week of being identified. If the impact is moderate or minor, a period of one month applies. [The AFM website](#) provides more information about what these levels of impact entail. It also states what information you must include in your notification.

If you invoke an exemption, the directive sets specific conditions. See our website for further details on EAA notifications.

3. Observations from AFM's exploratory study

In early 2025, the AFM conducted an exploratory study to assess how market participants are preparing for the EAA. Through interviews with financial institutions of various sizes and sectors, we identified factors that facilitate or hinder implementation. Most organisations have actively started implementing the requirements. Below, we share a brief overview of our observations.

Incorporate accessibility into your vision of customer interests

Organisations that are well advanced in implementation often have a clear vision on accessibility. By designating accessibility as a strategic KPI, it becomes a structural part of business operations and the customer's interests are given central priority.

Conduct a gap analysis to identify necessary changes

Without a gap analysis, it is difficult to estimate the scope of work and associated costs. Many organisations underestimate this. Organisations that approach the EAA as a change project make faster progress in its implementation. It is also important to involve outsourcing partners early and make agreements on required adjustments. Suppliers can support strategic decisions and contribute to the gap analysis.

Use the right expertise and tools for continuous monitoring

Even organisations that have made progress with the implementation can make improvements by deploying appropriate expertise and tools for continuous monitoring. The use of appropriate tools and knowledge strengthens the monitoring process and contributes to the structural testing of the accessibility of services. In addition, it is important to set up a process whereby complaints, questions, or signals from consumers are effectively addressed and resolved, so that accessibility is also continuously improved.

Embed long-term accessibility in decision-making and vision

While many organisations approach the EAA as a change project, long-term embedding and organisation-wide support are crucial. Although good progress has been made in compliance and strategy, integration into decision-making processes is lagging. This makes it difficult to ensure accessibility as a long-term customer interest. In their vision of accessibility, most organizations do not yet make an explicit distinction between customers with and without disabilities. By distinguishing between the customer journey of customers with and without disabilities, organizations can better monitor whether their services are truly accessible.

4. What does the AFM do?

The AFM actively monitors the accessibility of the financial sector. We assess notifications from companies and consumers regarding bottlenecks or non-conformities. These signals help us identify trends and risks. In addition, we engage in dialogue with market participants, industry bodies and advocacy organisations to better understand developments and challenges. In doing so, we explicitly pay attention to the experiences of people with disabilities.

Complying with the new directive requires effort from institutions, partly because it involves open standards. At the European level, the AFM contributes to further clarification of open or ambiguously formulated standards. Where necessary, we consult with fellow supervisory authorities to arrive at clear interpretations and ensure a level playing field.

More information about the requirements of the European Accessibility Act can be found on [our webpage](#). If you find that information is missing or if you encounter specific challenges, please let us know by emailing: Toegankelijkheidsrichtlijn@afm.nl. The AFM will provide further clarification as best it can, including by further supplementing the information on the webpage.