

Bird & Bird

# European Accessibility Act

Czech - Slovak Comparative Guide

*April 2025*



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# Comparison of the implementation of the European Accessibility Act in Slovak and Czech legislation

*On June 28, 2025, new Slovak and Czech laws and regulations will come into force implementing Directive (EU) 2019/882 of the European Parliament and of the Council on accessibility requirements for products and services (the "**Directive**").*

Let's take a look together at the implementation of the Directive in the context of the Slovak and Czech legislation and what consequences or obligations it will bring to service providers, manufacturers, importers, distributors and others in practice, in relation to products and services.

We recommend that all entities involved in the field of production, distribution or provision of products and services start preparing as soon as possible to comply with the new requirements.

## Key steps include:

- conduct an audit to assess whether your products and services fall within the scope of the new law;
- identify your role in the supply chain;
- adapt internal processes, train employees;
- continuously check compliance with the legislation, and, where appropriate, monitor the issuance of supporting or clarifying recommendations and guidance in each sector.



## The method of implementation in national legislation

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
At the end of 2023, Act No. 424/2023 Coll. (the " <b>Czech Act</b> ") was published in the Collection of Laws, which transposes Directive (EU) 2019/882 of the European Parliament and of the Council on accessibility requirements for products and services (the " <b>Directive</b> "). The Act comes into force on 28 June 2025.	<p>At the end of 2022, Act No. 351/2022 Coll. on the accessibility of products and services for persons with disabilities and on an amendment and supplementation of certain laws (the "<b>Slovak Act</b>") was published in the Collection of Laws, which transposes Directive (EU) 2019/882 of the European Parliament and of the Council on accessibility requirements for products and services (the "<b>Directive</b>").</p> <p>With regard to secondary national law, this comprises the following:</p> <ul style="list-style-type: none"> <li>a Government Regulation No. 282/2023 Coll. on the technical requirements for accessibility of products for persons with disabilities (the "<b>Government Regulation 282/2023</b>"), and</li> <li>b Government Regulation No. 283/2023 Coll. on the requirements for accessibility of services for persons with disabilities (the "<b>Government Regulation 283/2023</b>") (together the "<b>Government Regulations</b>"). Government Regulation 283/2023 regulates accessibility requirements for services for persons with disabilities, functionality criteria, and criteria for assessing undue burden.</li> </ul> <p>All three pieces of national legislation will be effective from 28 June 2025.</p>	<p>In the conditions of the Slovak Republic, the European Accessibility Act (the "<b>EAA</b>") has been implemented not only in a single act but also in regulations.</p> <p>The Czech Act regulates both services and products (in one legal norm), while the Slovak Act primarily regulates only services, while products are regulated in Government Regulation 282/2023.</p> <p>Notwithstanding the above, all legal norms will enter into force on 28 June 2025.</p>

## Aim of the Act

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
The main aim of the Czech Act is to ensure that selected products and services are accessible to the widest possible range of consumers, particularly persons with disabilities. However, other persons, such as senior citizens or foreigners, may benefit from the Czech Act as well. The result should be a better quality of life and a higher level of equality for all.	The main aim of the Slovak Act and Government Regulations is to ensure that selected products and services are accessible to the widest possible range of consumers, particularly persons with disabilities. However, other persons, such as senior citizens or foreigners, may also benefit from the Slovak Act and Government Regulations. The result should be a better quality of life and a higher level of equality for all.	The Slovak Act, Government Regulations and the Czech Act were adopted in response to the EAA, which has been transposed into national law; both retain the EAA's objective of ensuring that selected products and services are accessible to the widest possible range of consumers, particularly people with disabilities.

## Accessibility as a key element of integration

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>Accessibility of products and services covers various aspects, from technical features to information tools that make them accessible to people with limited mobility, sight or hearing.</p> <p>An accessible product or service means a product or service that is intended for use by a natural person and manufactured (in the case of products) or provided (in the case of services) so that persons with disabilities can use it to the fullest extent possible.</p>	<p>Accessibility of products and services covers various aspects, from technical features to information tools that make them accessible to people with limited mobility, sight or hearing.</p> <p>An accessible product or service means a product or service that is intended for use by a natural person and manufactured (in the case of products) or provided (in the case of services) so that persons with disabilities can use it to the fullest extent possible.</p>	Both the Slovak and the Czech legislation set out certain criteria and requirements that must be met and incorporated into products and services to make them accessible to people with disabilities. All the information required by law must be provided in full, and in the form required by law.

## Scope of products and services subject to regulation

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>The Czech Act only applies to selected products and services.</p> <p>These include, for example: personal computers, laptops, mobile phones, tablets, routers, modems, self-service terminals including ATMs, e-book readers, and devices for accessing audiovisual services (e.g. set-top boxes).</p> <p>In the area of services, the regulation covers, for example: electronic communication services, financial services, e-commerce services and transport services.</p>	<p>The Slovak Act and Regulations only apply to selected products and services.</p> <p>Government Regulation 282/2023 includes, for example: personal computers, laptops, mobile phones, tablets, routers, modems, self-service terminals, e-book readers, and devices for accessing audiovisual services (e.g. set-top boxes).</p> <p>In the area of services, the Slovak Act covers, for example: transport services (with some exemptions), financial services, e-books, and specialised software and information society services.</p> <p>The list of products and services under the Slovak legislation closely mirrors the list outlined in the Directive, with one terminology exemption. The Slovak Act uses the term "information society services" instead of "e-commerce services" to clarify that these services include, in particular, commercial communications; the processing, transmission, storage, retrieval or assembly of data and electronic mail, excluding personal electronic mail. Information society services do not include radio and television broadcasting, but do include teletext, voice telephony services, telefax services, and services whose content precludes their provision at a distance.</p>	<p>Both the Czech and the Slovak legislation mirror the scope of products and services outlined in the Directive. However, it is important to be aware of any differences in terminology that may have an impact on the final assessment of whether a product/service is subject to regulation.</p>



Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>The list of products and services under the Czech Act closely mirrors the list outlined in the Directive, with one minor terminological exception. The Czech Act uses the term "financial services" instead of "banking services" to clarify that these services are provided not only by banks but also by other service providers, such as non-bank consumer credit providers.</p>	<p>The requirements for accessibility of electronic communication services, services providing access to audiovisual media services, and emergency communication services directed to the single European emergency call number "112" for persons with disabilities, the obligations of providers of these services, and the competence of state administration bodies in the field of supervising the fulfilment of the requirements for accessibility of these services for persons with disabilities, are laid down in special regulations (264/2002 Coll. on media services and on amendment and supplementation of certain laws (Media Services Act); Act No 452/2021 Coll. on electronic communications, as amended).</p>	



## Exemptions

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>The Czech Act provides a number of exemptions, specifying cases that are not covered by the Czech Act.</p> <p>For example, the Czech Act will not apply to service providers if they are a so-called micro-enterprise (i.e. an enterprise that employs fewer than ten people and whose annual turnover or annual balance sheet total does not exceed EUR 2 million). The Czech Act also will not apply to machine-to-machine electronic communications services; website and mobile application content that does not belong to the service provider unless it is funded, created or influenced by the service provider; or online maps and mapping services that provide key information in an accessible digital form for navigation maps, self-service terminals installed as an integral part of a means of transport or services provided as part of urban, suburban and regional transport services (unless this concerns self-service terminals, which are subject to the Czech Act).</p> <p>Except for some terms, the definitions used in the Czech Act mirror the terminology of the Directive, which often does not define terms itself but refers to other EU legislation.</p>	<p>The Slovak Act provides a number of exemptions, specifying cases that are not covered by the Slovak Act.</p> <p>For example, the Slovak Act will not apply to service providers if they are a so-called micro-enterprise (i.e. an enterprise that employs fewer than ten people and whose annual turnover or annual balance sheet total does not exceed EUR 2 million). The Slovak Act also will not apply to website and mobile application content that does not belong to the service provider unless it is funded, created or influenced by the service provider; or online maps and mapping services that provide key information in an accessible digital form for navigation maps or self-service terminals installed as an integral part of a means of transport or services provided as part of urban, suburban and regional transport services (unless this concerns self-service terminals, which are subject to Government Regulation 282/2023).</p> <p>Except for some terms, the definitions used in the Slovak Act mirror the terminology of the Directive, which often does not define terms itself but instead refers to other EU legislation.</p>	<p>Both the Czech and the Slovak legislation mirror the list of exemptions outlined in the Directive. However, it is important to be aware of any differences in terminology that may have an impact on the final assessment of whether a product/service is subject to regulation.</p>



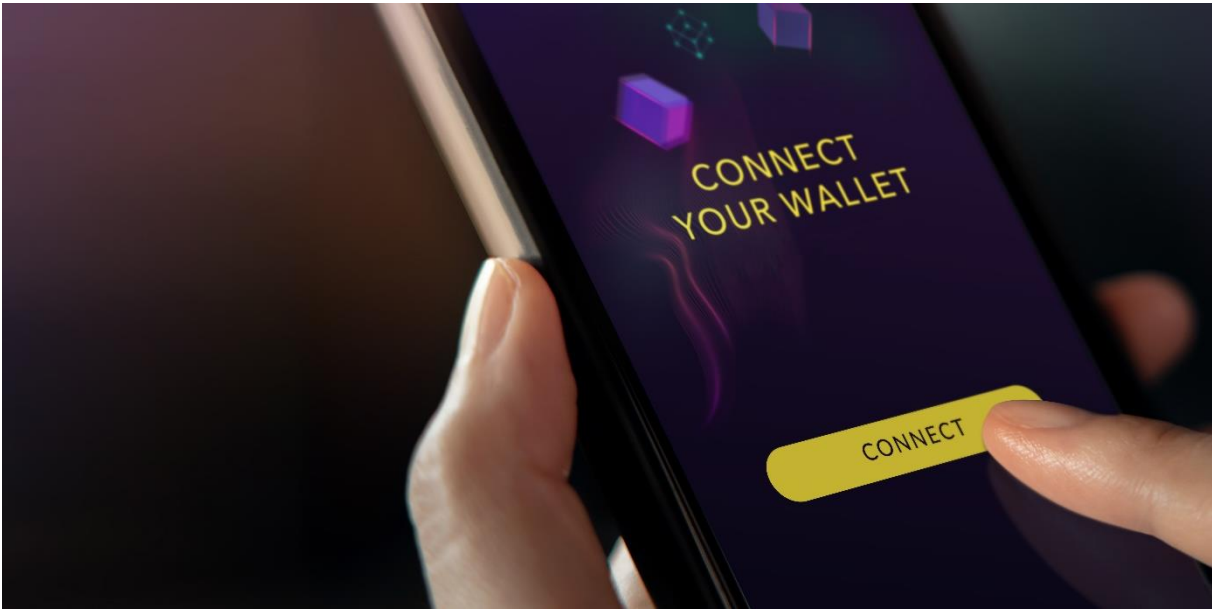
## Obligated entities

	Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
	The Czech Act introduces obligations for entities involved in the product supply chain (manufacturer, importer, distributor...) and service providers.	The Slovak Act and Governmental Regulations introduce obligations for entities involved in the product supply chain (manufacturer, importer, distributor...) and service providers.	Government Regulation 282/2023 and the Czech Act regulate the scope of obliged entities, namely manufacturers, importers, distributors, service providers, etc.
<b>Manufacturers</b>	<p>Manufacturers must ensure that their products meet the accessibility requirements set out in the Czech Act. This includes drawing up technical documentation, carrying out a conformity assessment, and affixing the CE mark to the product to confirm its compliance with the relevant standards. This also applies to a change to the product or the harmonised standard or technical specification on whose basis the conformity of the product was declared.</p> <p>Manufacturers are also obliged to keep the documentation for five years after the product is placed on the market. Another key change is that manufacturers are obliged to ensure that all safety and user information is available in an accessible form (including instructions for use and safety information in the Czech language). Instructions for use and safety information must be clear, comprehensible and easy to understand.</p>	<p>Manufacturers must ensure that their products meet the accessibility requirements set out in the law. This includes drawing up technical documentation, carrying out a conformity assessment, and establishing procedures to maintain the conformity of the mass production of the product and to take account of changes in the product's design or characteristics, or in the harmonised standard or other technical specification on whose basis the conformity of the product was declared.</p> <p>Manufacturers are also obliged to keep the technical documentation and declaration of conformity for ten years after the product is placed on the market. The manufacturer must accompany the intended product with instructions for use and safety instructions in the national language which are unambiguous and comprehensible to the consumer or other end user of the intended product.</p>	Obligations and rights in relation to each group are set out in the individual provisions of the legal norms – the Czech Act and Slovak Government Regulation 282/2023, but they do not differ substantially. However, the Slovak legislation, particularly law No. 56/2018 Coll. on product conformity assessment, making available of the product on the market and on change and amendment of certain Acts, regulates manufacturers' obligations in more detail.

	Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
Importers	<p>Importers are responsible for checking that imported products comply with the accessibility requirements, and for ensuring that they are accompanied by all the relevant information.</p> <p>Similarly, distributors must ensure that the storage and transport of products does not compromise their compliance with the accessibility requirements.</p>	<p>Importers are responsible for checking that imported products comply with the accessibility requirements, and for ensuring that they are accompanied by all the relevant information.</p> <p>Similarly, distributors must ensure that the storage and transport of products does not compromise their compliance with the accessibility requirements.</p>	<p>At the same time, under the Slovak legislation, the manufacturer is obliged to keep the documentation for ten years, whereas the Czech legislation sets a period of only five years. Considering the above, it is clear that Slovak legislation adopted some of the Directive's provisions with stricter rules.</p>
Service Providers	<p>Likewise, service providers have a duty to ensure that the service they provide complies with the accessibility requirements at all times. The provider is also obliged to publish information on how the service meets the accessibility requirements, a general description of the service, and other information needed to understand how the service functions.</p> <p>Upon request, the service provider must also provide such information in audio form. If the information is published on a website, it must be made available in commonly accessible formats (e.g. .DOCX, .PDF).</p>	<p>Likewise, service providers have a duty to ensure that the service they provide complies with the accessibility requirements at all times. The provider is also obliged to publish information on how the service meets the accessibility requirements, a general description of the service, and other information needed to understand how the service functions.</p> <p>The service provider is obliged to make information on the accessibility requirements available to the public in commonly accessible formats (in the general terms and conditions). The service provider must also provide the information in audio format to the extent provided for by law (Law No. 264/2022).</p>	

# Harmonised standards

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>The Czech Act allows for the use of harmonised standards as means to comply with the accessibility requirements. Harmonised standards offer specifications; compliance with these creates what is known as a presumption of conformity. This mechanism makes it easier for manufacturers and service providers to meet their obligations. Harmonised standards also contribute to ensuring a uniform quality standard across EU Member States, which facilitates trade and increases legal certainty.</p>	<p>The Slovak Act and Regulations allow for the use of harmonised standards as means to comply with the accessibility requirements. Harmonised standards offer specifications, whereby compliance with them creates what is known as a presumption of conformity. Harmonised standards also contribute to ensuring a uniform quality standard across EU Member States, which facilitates trade and increases legal certainty.</p>	<p>Compliance with the harmonised standards is regulated similarly in the two legal systems, with reference to the Official Journal of the European Union.</p>



## Significant change and disproportionate burden

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>A manufacturer or service provider is not, under certain circumstances, obliged to comply with the accessibility requirements to the extent that compliance would require a significant change to the product or service or would impose an unreasonable burden under the criteria set out in the Czech Act.</p> <p>Manufacturers and service providers intending to apply this exemption must prepare and document an assessment that justifies the exemption. The supervisory authorities have the power to review the assessment. Transparency and proper documentation are important conditions for claiming the exemption, allowing for review at both the national and European levels.</p>	<p>A manufacturer or service provider is not, under certain circumstances, obliged to comply with the accessibility requirements to the extent that compliance would require a significant change to the product or service or would impose an unreasonable burden under the criteria set out in the Slovak Act and Government Regulations.</p> <p>Manufacturers and service providers intending to apply this exemption must prepare and document an assessment that justifies the exemption. The supervisory authorities have the power to review the assessment. Transparency and proper documentation are important conditions for claiming the exemption, allowing for review at both the national and European levels.</p>	<p>Both Czech and Slovak legislation similarly implement provisions on significant changes and disproportionate burden.</p>

## Sanctions

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
<p>Where a product or service does not meet the requirements set out in the Czech Act, the supervisory authority may require the obliged entity to take remedial action. Otherwise, the supervisory authority may order that the product be withdrawn from the market. The supervisory authority will also publish a list of non-compliant products and services on its website.</p> <p>Further, failure to comply with the legal obligations may be considered an offence for which a fine of up to CZK 1, 2, 5 or 10 million may be imposed (depending on the nature of the offence and the obliged entity).</p>	<p>Where a product or service does not meet the requirements set out in the Slovak Act or Regulations, the supervisory authority may require the obliged entity to take remedial action. The supervisory authority in charge of the requirements for the accessibility of services for persons with disabilities, and for providers' fulfilment of their obligations, is the Slovak Trade Inspection, in the scope specified in the Act, otherwise in accordance with Act No. 128/2002 Coll. on state control of the internal market in consumer protection matters and on amending and supplementing certain acts.</p> <p>Further, failure to comply with the legal obligations may be considered an offence for which a fine of up to EUR 6 000, 20 000 or 30 000 may be imposed (depending on the nature of the offence and the obliged entity). Sanctions in the field of conformity assessment are carried out by the Slovak Trade Inspection pursuant to a special regulation, Act No. 56/2018 Coll., which regulates the amount of fines up to EUR 200,000.</p>	<p>The Slovak Act does not foresee the publication of a list of non-compliant products and services on a website.</p> <p>Penalties for breaches of obligations are significantly higher under the Czech Act than under the Slovak Act. In the Slovak Republic, the Act on State Control also applies to breaches of the Slovak Act, but may impose a fine of up to EUR 200,000.</p>

## Effectiveness and transitional periods

Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
In general, products and services will have to comply with the accessibility requirements if they are placed on the market or provided after 28 June 2025.	In general, products and services will have to comply with the accessibility requirements if they are placed on the market or provided after 28 June 2025.	The Czech and Slovak legislation will enter into force in accordance with the Directive, i.e., on 28 June 2025.
Self-service payment and self-service terminals that do not meet the accessibility requirements used by service providers while providing services before 28 June 2025 may be used for a maximum of 20 years from the date of their first commissioning.	The Slovak Act does not apply to websites and mobile apps that were not created or funded by a service provider, or content that was published before the 2025 deadlines.	
On the basis of a contract concluded before 28 June 2025, a service provider may provide services that do not meet the accessibility requirements in an unchanged form until the termination of the contractual obligation, but no later than 28 June 2030.	A service provider (including a multimodal access service provider) may, on the basis of a contract concluded before 28 June 2025, provide services that do not meet the accessibility requirements in an unchanged form until the termination of the contractual obligation, but no later than 28 June 2030.	
Until 28 June 2030, a service provider may provide services with products that do not meet the accessibility requirements, provided that those products (i) were used for the provision of similar services in accordance with then-effective legislation, and (ii) were placed on the market no later than 28 June 2025.	Up to 28 June 2030, a multimodal access service provider may provide services with products that do not meet the accessibility requirements, provided that those products are used to provide the service no later than 28 June 2025.	



Czech implementation of the EAA	Slovak implementation of EAA	Differences in implementation across countries
The accessibility requirements do not apply to pre-recorded time-based media and office file formats published on websites or mobile applications before 28 June 2025 or websites and mobile applications that contain only content not updated or modified after 28 June 2025.	The accessibility requirements do not apply to (i) pre-recorded time-based media and office file formats; (ii) office file formats published on websites or mobile applications before 28 June 2025, or (iii) websites and mobile apps that are considered archived if they contain only content not updated or edited after 28 June 2025.	



# Our recommendation

We recommend that entities involved in the production, distribution or provision of products and services start preparing as soon as possible to comply with the new requirements.

## Key steps include:

- conduct an audit to assess whether your products and services fall within the scope of the new law;
- identify your role in the supply chain;
- adapt internal processes, train employees;
- continuously check compliance with the legislation, and, where appropriate, monitor the issuance of supporting or clarifying recommendations and guidance in each sector.

To reduce the administrative burden, it seems appropriate to use harmonised standards (where already available within a given sector) and, where appropriate, to cooperate with accessibility experts.



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