



Plain Language Summary

There are three new government directives that apply to companies doing business in the European Union (EU). All three of them impact people with disabilities and their involvement in the economy in important ways. The most important takeaway is that disability is now recognized as a sustainability matter for companies. This means that hiring employees with disabilities, making products for consumers with disabilities, earning money and loyalty from buyers with disabilities, asking for input from users with disabilities, and preventing discrimination against workers with disabilities is important for a company's financial earnings and long-term wellbeing. When companies engage people with disabilities as employees, consumers, buyers, users, and workers, it makes the company better off in the long term. Here's an overview of each of the three new policies:

1

The first law is called the European Accessibility Act, or "EAA." The EAA goes into effect in June 2025. The purpose is to make products (such as cell phones, office equipment, computers, and machines) and services (such as ticketing, banking, parking, online shopping, and e-reading) usable by people with disabilities. Companies now must test and certify that their products and services are usable by people with disabilities. If their products and services are not usable to people with disabilities, then companies may not be able to sell those products and services until they become usable by people with disabilities.

2

The second directive is called the Corporate Sustainability Reporting Directive, or "CSRD." The CSRD goes into effect in 2025. The CSRD requires companies to share information with the public about how the company is decreasing risks that might negatively affect the company's value. Sharing this information with the public helps people decide which companies they want to work for, to invest in, and to buy things from. Companies are used to sharing information about their environmental impacts and how they are working to decrease risks related to climate change and resource use.

However, under CSRD, companies must also share information about how they are decreasing risks related to people, including people with disabilities. First, companies need to decide whether people with disabilities, as workers or as buyers, present risks or opportunities that could affect the company's value. Then companies need to share information with the public about people with disabilities. This includes descriptions of programs and employee statistics about disability. This information helps people decide what companies will have long term and/or shared values so that they can make good choices about where to work, where to invest, and where to shop. The CSRD goes into effect in 2025.

3

The third directive is called the Corporate Sustainability Due Diligence Directive, or "CSDDD." The CSDDD goes into effect in 2026. The CSDDD requires companies to find and decrease risks among suppliers, which are the other companies that provide goods (such as materials or parts) or services (such as technology or information) to them. CSDDD applies to companies that are not sharing information under the CSRD. The CSDDD goes into effect in 2026.

These three new directives encourage companies to make products usable people with disabilities and to hire people with disabilities. The laws recognize that disability is related to value. Companies can add value by making products usable by people with disabilities, employing people with disabilities, and selling to people with disabilities. Disability:IN, a global disability inclusion non-profit, published a paper with a law firm about these new directives.

[To access the full, paper click here.](#)

Legislative Comparison Chart

EUROPEAN ACCESSIBILITY ACT (EAA)

Effective Date: June 28, 2025		
Scope: Manufacturers, importers, distributors, and service providers operating in the EU		
Purpose	Core Requirements Regarding Disability	Penalties
To make products (cell phones, office equipment, computers) and services (ticketing, banking, parking, online shopping) usable by people with disabilities	<p><u>Introduces new requirements regarding accessibility to the European Certificate of Conformity (CE marking)</u></p> <p><u>Add the dimension of accessibility to the existing requirements that products and services must already meet when entering or being offered in the EU</u></p> <p><u>Every manufacturer, importer, or distributor must consider the accessibility of their product or service to persons with disabilities when achieving and monitoring regulatory compliance</u></p>	<p>Importers and distributors may not bring non-compliant products into or distribute within the EU market</p> <p><u>National penalties</u> may include (1) restriction from market, (2) fines ranging from EUR 5,000 to EUR 1,000,000 and (3) up to 18 months imprisonment</p>

CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD)

Effective Date: 2025 for FY 2024		Effective Date: 2026 for FY 2025	Effective Date: 2027 for FY 2026
Scope: Large EU "public interest entities"		Scope: Large EU undertakings and EU parent undertakings of large groups	Scope: EU small and midsize enterprises ("SMEs") that are listed on EU regulated markets
Purpose	Core Requirements Regarding Disability	Penalties	
To compel companies to disclose information with the public about how the company is decreasing risks that might negatively affect the company's value	<p>Requires companies to report on sustainability related issues with a detailed set of disclosure standards known as the European Sustainability Reporting Standards (ESRS); reported information subject to audit</p> <p>Disability is subject to a double materiality threshold, meaning that each in-scope entity must report on impact materiality (an entity's impact on sustainability matters) and financial materiality (risks and opportunities for entities resulting from sustainability matter)</p> <p>Required include <u>qualitative programmatic initiatives and quantitative workforce data</u> about disability in operations and value chain</p>	<p><u>Penalties</u> for non-compliance with the CSRD should be "effective, proportionate and dissuasive."</p> <p>For example, France's penalties for non-compliance include fines for various infringements up to EUR 75,000 and the additional threat of up to five years in prison for directors of in-scope entities</p>	

CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE (CSDDD)

Effective Date: July 26, 2026		
Scope: Large companies operating within the EU, as well as to non-EU companies selling goods or providing services within the EU's market; secondary to CSRD		
Purpose	Core Requirements Regarding Disability	Penalties
To ensure that companies respect human rights and the environment throughout their supply chains	<p>Requires companies to identify, prevent, mitigate and account for actual and potential adverse impacts of company's operations and business relationships on human rights, the environment, and good governance</p> <p>Specifically, the "right to enjoy just and favorable conditions of work", including "fair and equal remuneration without distinction of any kind for employees with disabilities"</p>	<p>EU Member States will enact rules on penalties, These penalties should be "effective, proportionate and dissuasive."</p> <p>Fines, determined by turnover, can reach a maximum of 5% of worldwide turnover.</p> <p>A system of "naming and shaming" has to be implemented whereby companies failing to comply with the pecuniary penalty are named in a public statement.</p>