

The EAA for Agencies

Selling accessibility as a service – a practical guide for web and digital agencies

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Since 28 June 2025, digital accessibility has been a legal requirement across the European Union for a wide range of consumer-facing websites. For agencies this is, at first sight, one more obligation – and, at second sight, one of the biggest business opportunities since the GDPR: a topic that touches almost every client portfolio, demands real expertise and requires ongoing care. This guide shows how to build, price and sell accessibility as a credible, recurring service.

1. The starting point: the EAA applies – to more websites than many expect

The European Accessibility Act (EAA, Directive (EU) 2019/882) has applied since 28 June 2025 through national implementation laws in every EU member state – in Germany, for instance, as the BfSG. Unlike earlier rules, it is not aimed at public authorities but at the private sector: businesses offering certain products or services to consumers must make them accessible, measured against EN 301 549, which for web content points to WCAG 2.1 level AA.

The decisive point for agencies: “e-commerce services” is interpreted broadly. That pulls many small and medium-sized client websites into scope, for example:

- online shops of any size – from enterprise platforms to a farm shop with a cart;
- websites with booking, appointment or reservation features (clinics, salons, restaurants, trade businesses);
- ordering and contract journeys, such as forms that lead directly to the conclusion of a consumer contract;
- providers of telecommunications, banking services, passenger transport, e-books and comparable services.

There is an exemption for microenterprises providing services (fewer than ten employees and no more than two million euros in annual turnover or balance-sheet total). Relying on it blindly is unwise: the exemption does not cover products, it disappears as the business grows, and clients, platforms and public-sector buyers increasingly demand accessibility regardless of the legal duty. For services under contracts concluded before 28 June 2025, transition periods run at the longest until 27 June 2030 – new websites, relaunches and changed offerings must comply immediately.

On the division of roles: the law addresses the provider of the service – the client, not the client's agency. Indirectly, though, the topic ends up on the agency's desk: new projects delivered without accessibility are likely to count as defective against

reasonable contractual expectations, and existing clients expect a proposal from their agency before an authority forces one. Whoever informs proactively turns a liability question into a commission.

The risk deserves a sober assessment – without scaremongering: national market surveillance authorities have been checking compliance since 2025, so far mostly in response to complaints. They can order remediation and, for persistent violations, impose fines – in Germany, for example, up to €100,000 – and may ultimately order a service to be discontinued. Competition-law cease-and-desist claims are also conceivable in some member states. A wave of mass enforcement has not materialised so far – yet the need to act is real, because a single complaint from an affected user is enough to trigger proceedings.

2. The opportunity: recurring revenue instead of a one-off project

Accessibility is not a state that is achieved once; it is a process. Every new page, every uploaded image, every additional plugin can introduce new barriers. That is exactly what makes the topic commercially attractive – it follows the same logic as hosting, maintenance or SEO:

- **Audit (one-off):** an assessment and action plan – a clearly scoped, billable project;
- **Implementation (one-off):** fixes in theme, templates and content;
- **Care and monitoring (monthly):** continuous checks, reports, remediation – predictable recurring revenue.

Better still, demand generates itself. Clients receive letters from trade associations, read about fines or are confronted with barriers by their own customers – and then they call their agency. Whoever can present a ready-made offer with clear packages at that moment wins the engagement; whoever has to stall risks losing the entire client to a better-prepared competitor.

There is a side effect worth mentioning in every pitch: accessible websites are almost always better websites. Clean semantics help search engine optimisation, sufficient contrast and operable forms improve conversion for every user group – the investment pays off twice.

3. A credible offer in five steps

A robust accessibility offer sells best as a clearly structured process. The following sequence has proven itself in practice:

Step 1: Assessment with an automated scan

Getting started takes little time: an automated scan checks the most important pages against measurable criteria (contrast, alternative texts, form labels, structure) and produces a report with concrete findings. That report doubles as the best sales tool available – it makes abstract obligations visible on the client's own project.

Step 2: Quick wins in the code

Many of the most common barriers can be removed with manageable effort: missing alternative texts, weak contrast, missing focus indicators, unlabelled form fields, broken heading hierarchies, a missing language attribute. These fixes deliver visible results quickly – and build the trust needed for the next steps.

Step 3: Widget plus real fixes

An accessibility widget (contrast mode, font size, read-aloud, navigation aids) gives visitors immediately tangible help and makes the commitment visible. It does not replace corrections in the source code. The credible approach is the combination: the widget as a complement for individual needs, real fixes as the foundation (see section 4).

Step 4: Accessibility statement

Service providers in scope must inform the public about the accessibility of their service. A well-maintained statement – what is met, what is still open, whom users can contact – therefore belongs in every package and signals an orderly process to the market surveillance authorities as well.

Step 5: Ongoing monitoring and reports

Monthly automated checks catch new barriers before they turn into complaints. Regular reports to the client document the status, justify the monthly retainer and hand the agency the arguments for follow-up work.

4. Honesty as a selling point

The accessibility market has a credibility problem: vendors of so-called overlays promise conformity “with a single line of JavaScript”. Market surveillance authorities and professional bodies have repeatedly made clear that an overlay on its own does not satisfy the legal requirements – the barriers in the underlying code remain in place.

Just as important: automated testing reliably detects only around 30 to 40 percent of the relevant WCAG requirements. Whether an alt text genuinely describes the image, whether a page can be operated by keyboard in a logical order, whether content is understandable – only a human can judge that.

This is precisely where a selling point lies: an agency that tells the client openly what automation covers and where human review is needed stands apart from dubious

promises – and at the same time justifies why ongoing care by an agency is worth its price. Honesty also protects the agency itself: whoever promises “100 percent conformity at the push of a button” will be held to that promise in a dispute.

5. Package suggestions with example prices

The following end-client prices (net, example figures) have proven to be a sound starting point for your own calculation – adjust upwards or downwards depending on market, positioning and the complexity of the sites:

Package	Setup (one-off)	Monthly	Included services (example)
Essentials	€990	€49	Automated scan with report, accessibility widget set-up, accessibility statement, monthly monitoring with a short summary
Standard	€2,400	€99	additionally: quick wins in the code (contrast, alt texts, forms, focus states), ongoing alt-text maintenance, quarterly report with a prioritised action list
Premium	from €4,900	€199	additionally: manual review of key pages against WCAG 2.1 AA, continuous fixes, editor training, priority support

A worked example with Wave Access Agency: the Agency plan of Wave Access costs €499 per month and covers 25 websites – roughly €20 per site in tooling costs. With those 25 clients on the Standard package, recurring revenue amounts to $25 \times €99 = €2,475$ per month against €499 in tooling – a contribution margin of almost €2,000 per month, before any one-off setup fees and before the follow-up work generated by the monitoring reports.

More important than the absolute price level is the structure: a clearly named one-off project to get started, a monthly retainer with a defined scope – and a report that makes the value of that retainer visible month after month. That keeps the engagement churn-resistant, because the client sees what the fee pays for.

6. Checklist for the client conversation

Ten points to clarify in the first conversation – ideally with the scan report on the table:

1	Does the website fall under the EAA rules? (online shop, booking or appointment feature, contracts concluded online, affected sector)
2	Does the microenterprise exemption apply – and does the client really want to rely on it?
3	What does the automated scan show? (bring the report and walk through the three most serious findings on screen)
4	Is there already an accessibility statement – and is its content still accurate?
5	Can forms, cart and checkout be operated entirely by keyboard?

6	Do all meaningful images have alt texts – including the most recently uploaded ones?
7	Are the colour contrasts of text, links and buttons sufficient – even within the existing corporate design?
8	Are embedded PDF documents accessible, or are there HTML alternatives?
9	Who will maintain content going forward – and does the editorial team know the essential rules?
10	Which package fits? (make a concrete offer: one-off setup plus monthly care)

Three common objections – and answers that hold up:

- *“Our audience isn't affected.”* – Around one in four adults in the EU lives with some form of impairment; add older users, temporary limitations and everyone who benefits from better usability.
- *“We'll deal with it when there's a problem.”* – By then it is more expensive: a single complaint is enough to bring the authorities in, and the same fixes cost a multiple under time pressure.
- *“Isn't a widget enough?”* – No. And that honest answer is exactly what separates a credible offer from questionable promises (see section 4).

7. The tool behind it: Wave Access

Wave Access is the accessibility plugin for WordPress by Wave Tools – built so that agencies can deliver steps 1 to 5 without building their own tooling. In detail, it takes care of:

- **Accessibility widget:** contrast mode, font size, reading aids, keyboard navigation – without external overlay services;
- **Real code fixes:** corrections applied to the delivered page instead of surface-level cosmetics;
- **AI alt texts:** automatic suggestions for image descriptions, editorially reviewable and adjustable;
- **Easy-to-read language:** AI-assisted conversion of page content;
- **Read-aloud:** text-to-speech with a natural voice;
- **External scan:** automated checks of public pages, including history;
- **Accessibility statement:** generator with maintained text modules;
- **PDF reports:** polished reports for client meetings and documentation;
- **White label:** widget and reports in the agency's own branding.

Partner programme: agencies earn a 20 percent commission on referred licences during each licence's first year. An informal e-mail to support@wavetools.io is all it takes – trial licences and help with packaging your offer are available there as well.

The pragmatic way in: request a trial licence, scan the agency's own website and rehearse the process with a friendly pilot client. After that, workflow, effort and arguments are in place – and the offer can be rolled out step by step across the entire client base.

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