VertaaUX

Research Report

The 2026 State of Digital Accessibility and UX Quality Across European Industries

A cross-industry benchmark of 154 web pages across 53 companies in 6 sectors in the EU and EEA

VertaaUX Research • April 2026 • 154 pages audited • 53 companies

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88%

of pages below accessibility threshold

Scored below 50/100

15

average accessibility score

Out of 100

24%

of pages scored zero

No measures detected

25,547

total issues identified

Across 154 pages

166

average issues per page

Some exceeded 1,000

22%

blocked automated auditing

HTTP 403 / 429 responses

EXECUTIVE SUMMARY

Six months after the European Accessibility Act (EAA) took effect, we attempted to audit 198 web pages belonging to 53 companies headquartered in the EU and EEA across six industries. The results are sobering.

> **88% of pages did not meet basic accessibility thresholds.** The average accessibility score across all industries is 15 out of 100. Twenty-four percent of pages scored zero -- the audit engine could not identify a single meaningful accessibility measure in place.

33% of pages scored below 50 overall. When we extend the analysis beyond accessibility to include usability, clarity, information architecture, conversion design, semantic markup, and keyboard navigation, the picture improves only slightly.

> **22% of target sites blocked automated auditing entirely.** Forty-four pages across 15 EU-headquartered companies returned HTTP 403 or 429 to our headless browser -- the same class of tool that regulators and compliance teams rely on to verify EAA compliance. E-commerce, the sector facing the most active enforcement, had the highest block rate at 59%.

This report presents the methodology, cross-industry findings, per-industry analysis, and recommendations for organizations preparing for or responding to EAA enforcement.

KEY FINDINGS AT A GLANCE

FINDING	DATA
Pages audited (successful)	154 of 198 targets
Pages blocked by bot protection	44 (22%)
Companies audited (EU/EEA HQ)	53
Mean overall UX score	55.0 / 100
Mean accessibility score	15.3 / 100
Pages with zero accessibility score	24%
Pages below accessibility threshold (score < 50)	88%
Total issues identified	25,547
Mean issues per page	166
Highest-scoring industry	Public Sector (61.8)
Lowest-scoring industry	E-commerce (47.6)

METHODOLOGY

Audit Engine

All audits were performed using the VertaaUX CLI (v0.4.0–0.5.2) in basic mode. The engine runs a headless Chromium browser against each target URL and evaluates the rendered page across seven weighted categories:

CATEGORY	WEIGHT	WHAT IT MEASURES
Accessibility	20%	WCAG compliance, ARIA usage, color contrast, form labels, alt text
Conversion	20%	CTA clarity, form UX, trust signals, error prevention
Usability	20%	Navigation patterns, cognitive load, responsiveness, touch targets
Clarity	15%	Value proposition visibility, scanability, visual hierarchy
Information Architecture	10%	Navigation depth, grouping logic, link consistency
Semantic Markup	8%	Heading hierarchy, landmark regions, HTML5 elements
Keyboard Navigation	7%	Focus order, tab trapping, skip links, focus indicators

Each category is scored 0-100. The overall score is the weighted average.

Sample

- **Geography:** EU member states and EEA (Norway). Only companies headquartered in the EU or EEA are included.
- **Industries:** E-commerce, Fintech, Healthcare, SaaS/B2B, Travel, Public Sector
- **Companies:** 8-14 per industry (including blocked), selected by market position and EU user base
- **Pages per company:** 3 (homepage, conversion page, flow page)
- **Total target audits:** 198
- **Successful audits:** 154 (78%)
- **Blocked by bot protection:** 44 (22%)
- **Audit period:** April 2026

Page Type Standardization

Each company was audited on three comparable page types:

1. **Homepage** -- primary entry point and first impression
2. **Conversion page** -- pricing, product category, or primary CTA destination
3. **Flow page** -- signup, registration, booking, or customer service interaction

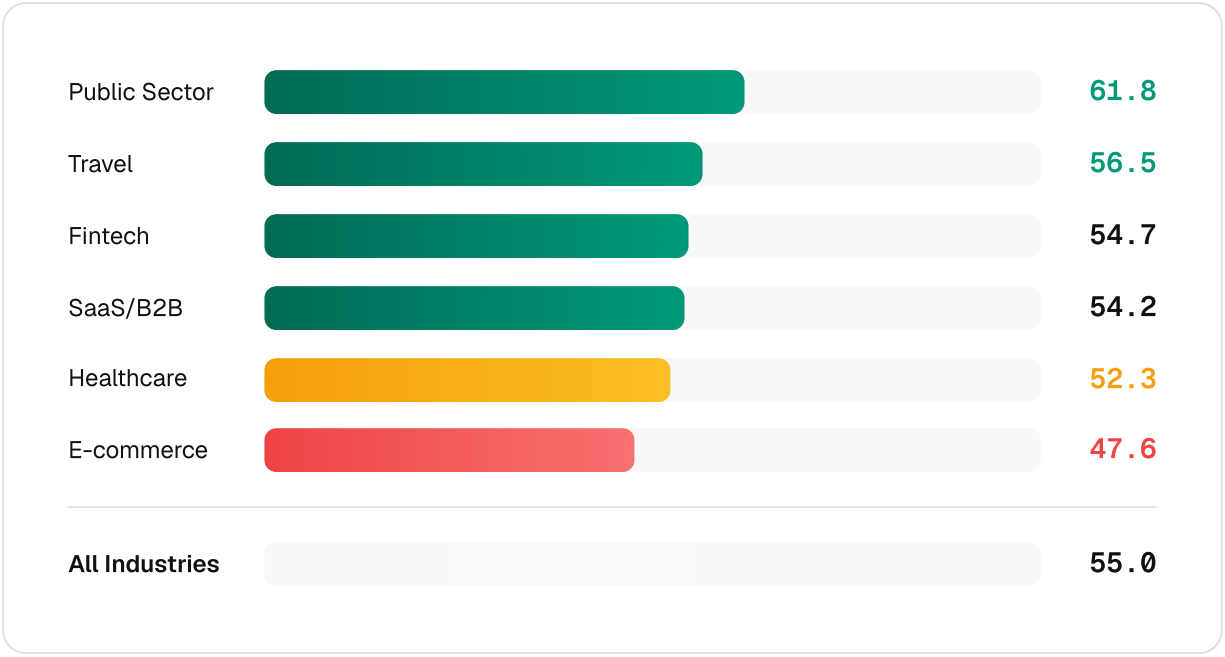
Limitations

- Only companies headquartered in the EU or EEA (Norway) are included. UK, Swiss, and US-headquartered companies were excluded.
- Audits capture a single point in time. Scores may fluctuate with deployments.
- Basic mode provides broad coverage but not the depth of a manual WCAG audit. Automated tools catch an estimated 30-57% of WCAG issues [S13]; the remaining issues require manual review.
- Bot protection prevented 44 of 198 audits from completing, creating significant sampling bias in e-commerce (59% blocked) and travel (27% blocked).

- Scores reflect automated analysis only. Manual expert review would identify additional issues.
- Company names are anonymized in the public version of this report.

CROSS-INDUSTRY RESULTS

Overall Scores by Industry



Public sector leads -- likely due to existing government accessibility mandates (EN 301 549, EU Directive 2016/2102) [S3]. E-commerce trails by 13 points despite being the first industry to face EAA enforcement action [S4].

Category Scores by Industry

INDUSTRY	A11Y	SEMANTIC	KEYBOARD	CLARITY	IA	CONVERSION	USABILITY
E-commerce	13	11	46	85	56	56	58
Fintech	21	20	66	83	53	59	69
Healthcare	12	24	59	78	55	60	67
Public Sector	24	67	67	86	58	55	70
SaaS/B2B	10	29	52	87	57	63	73
Travel	12	52	56	81	47	57	60

Two patterns emerge

> **Clarity scores are universally high (78-87).** European companies know how to write clear marketing copy and build scannable layouts. This is not where they fail.

> **Accessibility and semantic markup are universally catastrophic (10-67).** Public sector stands out in semantic markup (67) because government sites tend to use proper HTML5 elements. Every other industry scores below 21 on accessibility.

The Accessibility Crisis in Numbers

- **90% of pages scored below 50 on accessibility.** In a framework where 50 already indicates significant gaps, 90% of major European websites did not reach that threshold.
- **30% of pages scored zero.** No meaningful ARIA attributes, no alt text, no form labels, no color contrast compliance detected.

- **SaaS/B2B scored lowest at 10 average.** The companies building tools for other businesses had the weakest accessibility scores of any sector.

Issue Volume

Across 154 pages, the audit engine identified **25,547 issues**. The average page has **166 issues**. Some pages exceeded 1,000 -- driven by repeated patterns like missing alt text on product image grids or unlabeled form inputs across dynamic components.

THE COMPLIANCE PARADOX

When Security Blocks Accessibility

Of our 198 target audits, **44 returned HTTP 403 (Forbidden) or 429 (Too Many Requests).** The sites' Web Application Firewalls -- typically Cloudflare Bot Fight Mode or Akamai Bot Manager -- blocked the headless Chromium browser used by the audit engine.

This is the same class of tool used by accessibility compliance auditors, automated WCAG testing frameworks (axe-core, pa11y), regulatory enforcement agencies, and disability rights organizations.

Block Rates by Industry

E-commerce -- the sector where French disability rights organizations filed emergency injunctions against four major retailers in November 2025 [S4] -- has

the highest block rate. **59% of the EU e-commerce sites in our sample actively prevent automated accessibility auditing** -- eight of fourteen companies returned HTTP 403 before analysis could begin.

Block Rates by Country

COUNTRY	PAGES BLOCKED
Germany	12
Sweden	3
Poland	3
France	3
Finland	3
Netherlands	2

The Implication: Bot protection serves legitimate security purposes [O9]. But the current default configurations of major WAF providers create a paradox: they block the exact tools that organizations and regulators need to verify accessibility compliance. Blocking automated audit tools does not alter an organization's obligations under the EAA. It does, however, make independent verification more difficult -- for the organization's own compliance teams as much as for external assessors.

INDUSTRY PROFILES

E-commerce

Highest Risk

47.6	13	59%	16
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Product grids drive issue counts.** Pages with product listings often exceed 500 issues due to repeated missing alt text and unlabeled interactive elements across every product card.
- **Clarity is the bright spot (85).** These sites know how to communicate value propositions and make CTAs visible. The failure is in implementation, not intent.
- **Semantic markup is nearly absent (11).** Few e-commerce sites use proper heading hierarchies, landmark regions, or structured HTML5 elements.
- This industry faces the most immediate EAA enforcement risk. France, Sweden, and Norway have already initiated cases against retailers [S4].

Fintech

Average

54.7	21	10%	27
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Keyboard navigation is relatively strong (66)** -- likely because payment and authentication flows require form-level tab ordering.
- **Semantic markup is poor (20).** Modern JavaScript frameworks (React, Next.js) used by fintechs often output div-heavy markup that lacks semantic structure.
- The gap between homepage clarity (83) and flow page usability varies significantly across companies, suggesting inconsistent design system application.

Healthcare

High Risk

52.3	12	9%	29
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Accessibility is the worst category (12).** Medical apps and patient-facing portals show minimal ARIA implementation and poor form labeling -- the patterns that prevent users with disabilities from managing their health independently.
- **Norway's publicly reported daily fines against a major health app** serving ~425K residents demonstrate that enforcement is already active in this sector [S5].

SaaS/B2B

Worst Accessibility

54.2	10	9%	30
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Usability scores are the highest of any industry (73).** These teams know how to build usable interfaces. The accessibility gap is a knowledge and priority issue, not a capability issue.
- **Keyboard navigation is the worst of any industry (52).** Ironic for tools that power desk-based work.
- **Clarity is excellent (87),** reflecting the marketing sophistication of SaaS companies.

Travel

Above Average

56.5	12	27%	24
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Information architecture is the worst of any industry (47).** Travel sites with multi-step booking, search filters, and dynamic pricing create complex navigation.
- **Semantic markup splits sharply** between traditional travel companies (higher) and marketplace startups (lower).

Public Sector

Best Overall

61.8	24	10%	28
MEAN SCORE	ACCESSIBILITY	BLOCKED	PAGES AUDITED

- **Semantic markup is the standout (67)** -- dramatically higher than any other industry. Government sites use proper HTML5 landmarks, heading hierarchies, and structured content.
- **This proves the gap is closable.** Public sector demonstrates that when semantic markup is prioritized (even partially), scores improve significantly.
- The remaining accessibility gap (24) is in ARIA implementation, form labeling, and dynamic content -- areas where even mandated sites struggle [S3].

INTERPRETATION

What the Data Suggests About EAA Readiness

The following section reflects the authors' interpretation of the benchmark data. It does not constitute a compliance assessment of any individual company or sector.

The European Accessibility Act became enforceable on June 28, 2025 [S1]. Based on this benchmark:

Very few organizations appear ready

- 90% of pages did not meet basic accessibility thresholds
- The best-performing industry (Public Sector) still averages 24/100 on accessibility
- Even companies with strong UX teams (high usability, high clarity) have near-zero accessibility scores

> **The knowledge gap appears to be the primary barrier.** The data shows a clear pattern: companies that score well on usability (67 average) and clarity (84 average) score poorly on accessibility (15 average). These are not teams that lack design capability. The gap suggests a deficit in accessibility-specific knowledge and tooling in development workflows.

Enforcement pressure is likely to be asymmetric

- **E-commerce and travel appear to face the highest near-term risk** -- low scores, active enforcement activity [S4], and the highest bot-blocking rates that prevent self-assessment.
- **SaaS companies may be underestimating exposure** -- the lowest accessibility scores but minimal enforcement pressure to date.

- **Public sector has a head start** but remains far from threshold despite a 6-year mandate [S3].

Penalties vary dramatically by member state: from EUR 100,000 per violation in Germany to up to 10% of revenue in the Netherlands. Ireland has gone furthest with criminal penalties of up to 18 months imprisonment [S6].

RECOMMENDATIONS

What to Do Next

For Companies

1. **Run an automated baseline audit now.** You cannot fix what you don't measure. Automated tools catch 30-57% of WCAG issues [S13] -- enough to identify the most critical gaps.
2. **Start with semantic markup.** The data shows this is the single highest-leverage category. Proper headings, landmarks, and HTML5 elements improve scores across multiple categories simultaneously.
3. **Integrate accessibility into CI/CD.** Manual audits are expensive and instantly stale. Automated quality gates catch regressions before they ship.
4. **Review your WAF configuration.** If your bot protection blocks accessibility auditing tools, you are preventing your own compliance team -- and potentially regulators -- from assessing your site.

For Regulators

1. **Publish technical guidance on WAF compatibility.** Current bot protection defaults conflict with automated accessibility testing. Industry needs clear guidance on allowlisting audit tools.
2. **Prioritize e-commerce and healthcare enforcement.** These sectors have the lowest scores and the highest user impact.
3. **Recognize automated auditing as a necessary compliance tool.** Organizations that block automated auditing are not more compliant -- they are less auditable.

For A11y Community

1. **Semantic markup is the wedge.** It's the most teachable, most automatable, and most impactful category. Start advocacy here.
2. **The usability-accessibility gap is an opportunity.** Companies with high usability scores have the design talent to solve accessibility -- they need education, not capability [O13].
3. **Bot protection is becoming a systemic barrier** to the automated testing tools that scale accessibility compliance. This needs industry attention [O7].

GLOSSARY

EAA

European Accessibility Act (Directive 2019/882). EU legislation requiring digital products and services to meet accessibility standards, enforceable since June 28, 2025.

WCAG

Web Content Accessibility Guidelines. W3C standard defining how to make web content accessible. WCAG 2.1 Level AA is the baseline referenced by EU law via EN 301 549.

EN 301 549

The EU harmonised accessibility standard for ICT products and services. Incorporates WCAG 2.1 Level AA and extends coverage to hardware, telecommunications, and other ICT.

WAF

Web Application Firewall. Security layer that filters HTTP traffic. Major providers (Cloudflare, Akamai) include bot detection that can block accessibility audit tools.

ARIA

Accessible Rich Internet Applications. W3C specification adding semantic roles, states, and properties to HTML elements to improve assistive technology compatibility.

MCP

Model Context Protocol. An open standard for connecting AI assistants to external tools and data sources, enabling automated accessibility analysis in AI workflows.

CI/CD

Continuous Integration / Continuous Deployment. Software development practice of automating builds, tests, and deployments. Used here to mean automated accessibility checks in the build pipeline.

axe-core

Open-source accessibility testing engine by Deque Systems. The most widely used automated accessibility testing library, with 3 billion+ downloads.

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ABOUT THIS STUDY

This study was conducted by VertaaUX, an automated UX and accessibility audit platform. The audit engine scores websites across seven categories using a combination of rule-based analysis and heuristic evaluation in a real browser environment.

The full dataset (anonymized) is available for research purposes upon request.

AUDIT ENGINE	DATA COLLECTION	CONTACT
VertaaUX CLI v0.4.0–0.5.2, basic mode	April 2026	vertaaux.ai