CACTUS | JOURNAL OF TOURISM BUSINESS, MANAGEMENT AND ECONOMICS

EDITURA ASE

Methodological/Analytical Paper

TOWARDS AN INCLUSIVE TOURISM EXPERIENCE IN THE EUROPEAN UNION: ACCESSIBILITY, SERVICES AND THE EUROPEAN ACCESSIBILITY ACT

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How to cite: Tselegidis, K. (2026). Towards an inclusive tourism experience in the European Union: accessibility, services and the European accessibility act. *CACTUS - Journal of Tourism Business, Management and Economics*. *8*(2), 22–35.
https://doi.org/10.24818/CTS/8/2026/2.03

Received 17 September 2026; Revised 31 October 2026; Accepted 02 November 2026; Available online 06 November 2026.
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Abstract

The European Accessibility Act (Directive (EU) 2019/882) has applied through national implementing measures since 28 June 2025 to specified products and services relevant to travel. This paper examines the relationship between those legal duties and the conditions required for an inclusive tourism experience. It combines doctrinal analysis of EU and international instruments with a purposive, non-systematic synthesis of 14 peer-reviewed tourism studies, selected for their relevance to accessibility, digital information and the traveler journey. The provisions of the Directive are mapped against five stages of travel and distinguished from technical-standard provisions and voluntary management measures. The assessment identifies concentrated regulatory coverage in e-commerce and selected passenger-transport functions, but no general EU-wide physical-accessibility regime for accommodation and attractions under the Act. It develops a three-level interpretive framework separating regulatory accessibility, functional accessibility and lived inclusion, and specifies different units of assessment and forms of evidence for each level. Particular attention is given to EN 301 549 V4.1.1 (2026), its adoption of WCAG 2.2 and its status relative to standards cited in EU law. The paper offers an approach to evaluating accessibility across interconnected tourism services without treating managerial recommendations as legal obligations or conceptual findings as empirically validated outcomes.

Keywords: disability, digital services, traveler journey, universal design, social inclusion

JEL Classification: Z38, Z32, L83

1. Introduction

Accessibility in tourism has gradually moved beyond a narrow understanding focused on technical adaptations toward an approach centered on equal participation, autonomy, and the quality of the travel experience. This shift reflects both the international recognition of the rights of persons with disabilities and developments within tourism research itself. The United Nations Convention on the Rights of Persons with Disabilities treats accessibility as a prerequisite for independent living and full participation and explicitly links these rights to access to transport, information, communications, and places of tourism, recreation, and culture (United Nations, 2006). Likewise, the literature on accessible tourism has moved away from the fragmented examination of individual barriers toward the overall experience at the destination and throughout the journey (Darcy & Dickson, 2009; Darcy et al., 2020).

The digital organization of travel makes this discussion more complex. Destination choice, comparison of accommodation, booking, payment, ticketing, timetable information, and communication with providers now take place largely through websites, applications, and other digital interfaces. For travelers with disabilities, the accessibility of these touchpoints involves more than their technical usability. The accuracy of information about a room, the ability to identify accessible transport, or a clear description of available assistance can directly affect the decision as to whether a trip can be undertaken (Darcy, 2010; Eichhorn et al., 2008). Digital failures may therefore become barriers before physical travel has even begun.

Directive (EU) 2019/882 on accessibility requirements for products and services, commonly known as the European Accessibility Act (EAA), forms part of this evolving regulatory environment. The Directive stipulates that national transposition measures are to apply from 28 June 2025 and establishes common requirements for specific categories of products and services, including e-commerce services and certain elements of air, rail, bus, and waterborne passenger transport services (European Parliament & Council of the European Union, 2019). The obligations arising from this harmonized framework affect key functions of the tourism market, particularly digital touchpoints and mobility. The Directive does not, however, establish a horizontal European accessibility code for all tourism services or for the entire built environment of a destination.

This distinction is critical for managing tourism businesses and destinations. A consumer may use an accessible booking platform, complete payment without barriers, and receive an accessible electronic ticket, yet subsequently encounter insufficient information about accommodation, interruptions in transport, or physical barriers at the place they wish to visit. Legal compliance at one digital stage and the quality of the overall tourism experience are not equivalent. The traveler journey consists of a sequence of services often provided by different actors, and the failure of a single link can limit the value of adaptations made at earlier stages.

The purpose of this study is to determine where Directive (EU) 2019/882 intervenes in the traveler journey and what remains necessary for equitable participation once its legal requirements have been met. Three research questions guide the analysis. First, which stages and functions of a tourism journey are directly covered by the Directive, and through which service categories? Second, which gaps separate formal compliance from the traveler's practical ability to complete a journey and participate on equal terms? Third, what additional actions may be justified for tourism businesses and destination management, without presenting them as duties imposed by the Directive? Building on existing work on accessible destinations and the customer journey, the paper proposes a three-level assessment framework. Its contribution lies in relating legal scope, completion of cross-provider travel functions and experienced inclusion to distinct units of assessment and forms of evidence; the framework is conceptual and is not presented as an empirically validated measurement scale.

2. Literature review

2.1. From access to an inclusive tourism experience

Contemporary approaches to accessible tourism are associated with a move away from the medical model of disability and a stronger emphasis on the interaction between individual functional requirements and environmental barriers. The United Nations Convention reflects this logic by treating disability not solely as an individual characteristic, but as an outcome of the interaction between impairments and social, communication, and environmental barriers (United Nations, 2006). For tourism, the implication is practical: the question shifts from whether the traveler "can" use a service to whether the service system has been designed to permit predictable, safe, and autonomous participation.

Darcy and Dickson's (2009) whole-of-life approach linked accessibility to the life course, aging, and universal design, emphasizing that access requirements do not concern an isolated or fixed market segment. Subsequent literature has placed greater emphasis on equality in the experience offered rather than solely on the availability of individual facilities. Darcy et al. (2020) describe this development as a transition from research on "tourism and disability" to accessible tourism, in which the destination experience has become a central concern. This shift is also associated with sustainability, participation in decision-making, and the recognition of persons with disabilities as tourists, employees, service producers, and holders of knowledge (Gillovic & McIntosh, 2020).

Empirical research shows that access requirements and the ways barriers are negotiated are not uniform. Devile and Kastenholz (2018), studying persons with visual disabilities, identified an ongoing process of negotiating constraints and drawing on personal and interpersonal strategies. Rubio-Escuderos et al. (2024) showed that independence, trip organization, support from companions, and business conduct influence the experiences of travelers with reduced mobility. This diversity has two implications. First, broad disability categories are insufficient to predict everyone's needs. Second, accessibility cannot be

assessed solely through a binary "accessible or inaccessible" criterion, because usability and experience quality depend on the specific travel context.

The concept of inclusion adds another dimension. Simply being able to enter a place physically or use a website technically is not enough. An inclusive experience means that travelers have meaningful choices, can obtain reliable information, can make decisions without disproportionate dependence on others, and can participate in the same core activities as other visitors. Michopoulou et al. (2015) link the future of accessible tourism with human rights, universal design, destination competitiveness, and sustainable development. This connection allows accessibility to be treated as a component of tourism system design rather than as a corrective intervention applied after a service has already been organized. The bibliometric review by Qiao et al. (2022) confirms this shift, identifying experience and participation among the topics that have gained increasing prominence in accessible tourism research.

2.2. Information, digital accessibility and the traveler journey

Information is particularly important for travelers who need to know in advance whether a service meets their access requirements. Eichhorn et al. (2008) found that accessibility information schemes often fall short in terms of completeness, geographical coverage and their capacity to respond to differentiated requirements. A lack of information is not neutral. It increases uncertainty, shifts the cost of verification to the traveler and may lead to the abandonment of an option even when the service is usable in practice.

Darcy's (2010) study of accessible accommodation information showed that consumer preferences are more closely associated with specific functional requirements and levels of support than with simple demographic characteristics. It also highlighted the value of detailed, combined forms of presentation, including text, floor plans and photographic material. This finding remains critical in the digital market because technically accessible presentation does not guarantee that content is sufficiently specific to support a safe choice. A screen-reader user may be able to complete a booking, yet the transaction does not provide meaningful autonomy if reliable information about the entrance, bathroom or route to the room is absent.

Digital accessibility has also been examined as an organizational practice of tourism bodies. Domínguez Vila et al. (2018), in their assessment of national tourism organization websites, identified recurring problems related to navigation, compatibility, adaptability and alternative forms of content. Eusébio et al. (2023) documented significant weaknesses in the websites of hotels, travel agencies and museums, confirming that digital access remains uneven across different categories of providers. These studies predate the full implementation of Directive 2019/882 and therefore provide a useful baseline for considering what the new regulatory intervention seeks to address.

Technology can also serve as a means of coordination. Buhalis and Michopoulou (2011) argued that information technologies can support the personalized matching of traveler requirements with service characteristics. Cassia et al. (2020) extended the discussion to the level of the digital ecosystem, where the quality of an accessible experience depends on information exchange and coordination among multiple actors. The problem is readily apparent in tourism. The chain may include a carrier, booking platform, accommodation provider, activity provider, local transport operator and public destination body. Each controls a different part of the experience, and incompatibility between them creates new barriers.

The recent review by Sugden et al. (2026), based on 177 studies, organizes accessible tourism experiences around the customer journey and documents barriers affecting perceived ability to travel, information search, evaluation of alternatives, the in-trip experience and post-trip reflection. This approach is well suited to examining the European regulatory framework. It allows Directive 2019/882 to be assessed not as an abstract set of technical obligations, but as an intervention affecting specific points in the consumer's actual journey.

Earlier studies provide essential components for this analysis but do not combine them into a legal-to-experiential assessment structure. Darcy and Dickson (2009) and Darcy et al. (2020) locate accessibility within the destination experience, Gillovic and McIntosh (2020) examine inclusive development, and Cassia et al. (2020) emphasize coordination within digital ecosystems. Sugden et al. (2026) organize barriers and provider responses around the customer journey. The present framework draws on these

contributions but asks a different question: how can the precise scope of a named EU legal instrument be assessed alongside the functionality of an interconnected trip and the traveler's own experience? The proposed levels therefore distinguish evidence of a legal duty being met from evidence of task completion and evidence of meaningful participation. These dimensions are complementary rather than competing definitions of accessibility.

2.3. The European Accessibility Act as a regulatory intervention in tourism

Directive (EU) 2019/882 was adopted primarily to improve the functioning of the internal market by introducing common accessibility requirements for selected products and services. Its scope includes, among other areas, e-commerce services and certain elements of passenger transport. An e-commerce service is defined as a service provided at a distance, through websites and mobile device-based services, by electronic means and at the individual request of a consumer, with a view to concluding a consumer contract (European Parliament & Council of the European Union, 2019). Under this definition, a substantial part of online tourism booking falls functionally within the category of e-commerce, even though the Directive does not designate tourism as a separate regulated sector.

For covered air, bus, rail and waterborne passenger transport services, Article 2(2)(c) of the Directive addresses specified websites, mobile services, electronic ticketing, transport information and interactive self-service terminals, subject to the detailed conditions and exclusions in the text. For urban, suburban and regional transport services, its coverage is narrower and primarily concerns interactive self-service terminals under Article 2(2)(d). Annex I sets out requirements for the relevant products or services, including accessible information and functionality. The fact that a travel-related operation uses ICT does not, by itself, establish that every component of the journey falls within the Directive (European Parliament & Council of the European Union, 2019).

The Directive does not operate in a legal vacuum. Article 5 connects its requirements with pre-existing EU passenger transport law, while the websites and mobile applications of public sector bodies are governed by Directive (EU) 2016/2102 (European Parliament & Council of the European Union, 2016, 2019). For destination management organizations or public museums, therefore, the source of the digital accessibility obligation may differ from that applicable to a private online-booking provider. This multi-layered regulatory setting requires careful distinction because the notion of an 'accessible tourism website' may rest on different legal bases depending on the actor and the function provided.

Two further features limit the extent of harmonization. Microenterprises providing services are exempt from the accessibility requirements of the Directive, while Article 14 permits derogations where compliance would require a fundamental alteration in the basic nature of the product or service or would impose a disproportionate burden, subject to the conditions and procedures laid down in the Directive (European Parliament & Council of the European Union, 2019). The exemption is particularly relevant to tourism. The European Commission (2023) reports that SMEs account for 99.9% of tourism enterprises and that 91% of those SMEs are microenterprises. These figures describe enterprise size within the tourism ecosystem, not the proportion of services exempted under the EAA. Microenterprises remain subject to any other applicable EU or national accessibility obligations; the EAA alone does not ensure uniform coverage across the tourism supply chain.

A similar qualification is required in relation to the built environment. Article 4(4) allows Member States to decide that the built environment used by customers of services falling within the Directive is to comply with the accessibility requirements set out in Annex III. This option does not amount to a general EU obligation covering all hotels, restaurants, attractions or public spaces within a destination. Physical accessibility therefore continues to depend to a significant extent on other EU, national and local regulatory instruments. The European Accessibility Act has a more immediate effect on digital transactions and specific transport functions than on the physical infrastructure of the journey as a whole.

European technical standardization is developing alongside these legal obligations. EN 301 549 V4.1.1 was published by ETSI, CEN and CENELEC in September 2026 and incorporates WCAG 2.2 in the requirements relevant to web content, software and digital documents (European Telecommunications Standards Institute et al., 2026). Publication of a European standard and its citation as a harmonized

standard in the Official Journal of the European Union are separate steps. For the Web Accessibility Directive, Commission Implementing Decision (EU) 2021/1339 identifies EN 301 549 V3.2.1 (2021-03) as the referenced harmonized standard. As of the documentary check of 19 October 2026, the official guidance consulted did not identify V4.1.1 as an OJ-cited standard giving rise to a presumption of conformity under either the Web Accessibility Directive or the European Accessibility Act (AccessibleEU Centre, 2026; European Commission, 2021a). The legal force of the Directive itself is distinct from this evidential role of standards.

2.4. Technical developments in EN 301 549 V4.1.1 and their legal status

The distinctive feature of EN 301 549 V4.1.1 is its breadth. It is an accessibility standard for information and communication technology (ICT), not a general building-accessibility standard. Clause 4 sets out functional performance criteria, while Clauses 5–13 include requirements addressing generic ICT functions, real-time communication, audiovisual accessibility, hardware, websites, non-web documents and software, information on products and services, and relay or emergency-communication functions. Clause 14 concerns conformance. This matters for tourism because a booking platform, downloadable itinerary, ticket machine and mobile application may involve different technical provisions. Requirements are self-scoping and apply where the conditions specified in the relevant clauses are met; indiscriminate application of every clause to each tourism service would be incorrect (European Telecommunications Standards Institute et al., 2026).

The revision from WCAG 2.1 to WCAG 2.2 introduces six additional success criteria at Levels A and AA relevant to the familiar AA conformance target. These address keyboard focus being obscured (2.4.11), alternatives to dragging movements (2.5.7), minimum pointer-target size with specified exceptions (2.5.8), consistent placement of recurring help (3.2.6), avoidance of unnecessary repeated data entry (3.3.7), and accessible authentication without a mandatory cognitive-function test unless a permitted alternative or exception applies (3.3.8). Three further new WCAG 2.2 criteria are at Level AAA and should not be mistaken for new AA requirements. The obsolete criterion 4.1.1, Parsing, was removed. In tourism interfaces, the additional criteria are particularly relevant to date selectors, booking flows, payment controls and sign-in procedures (World Wide Web Consortium [W3C], 2023; European Telecommunications Standards Institute et al., 2026).

The revised standard also gives independent attention to the preservation of user preferences. Clauses 9.7, 10.7 and 11.7 cover, respectively, web pages, non-web documents and non-web software. For example, Clause 9.7 addresses blocking user-agent modes that respect accessibility preferences or overriding documented accessibility settings, subject to an exception where essential to the information or function. Annex A offers conformance mappings for ICT products and services. The informative Annex ZA relates relevant requirements to Directive (EU) 2016/2102, while the informative Annex ZB maps them to Directive (EU) 2019/882. Annex C is normative and specifies sufficient means of determining conformity with individual requirements, although it is not a complete testing methodology. These provisions help identify appropriate technical audit criteria; their applicability depends on the functions of the ICT and must be distinguished from the question of Official Journal citation (European Telecommunications Standards Institute et al., 2026).

The legal qualification remains essential. Under Directive (EU) 2016/2102, V3.2.1 is the cited reference for the relevant presumption of conformity, while V4.1.1 was not yet cited in the Official Journal at the research cut-off. Under the European Accessibility Act, Article 15 governs the presumption of conformity with accessibility requirements under harmonized standards and technical specifications, but neither the publication of V4.1.1 nor its informative mapping annexes independently establishes an EU-wide duty to comply with all its clauses. Applying the newer criteria as a prospective design target is therefore a reasoned technical recommendation, distinct from demonstrating conformity with the legal requirements already applicable to a particular provider (European Parliament & Council of the European Union, 2016, 2019; European Commission, 2021a; AccessibleEU Centre, 2026).

3. Methodology

The study uses a qualitative doctrinal and conceptual design appropriate for a methodological/analytical paper. It brings two bodies of material into dialogue: enforceable EU accessibility provisions and research on the practical organization and experience of tourism. This is a purposive critical synthesis, not a systematic or scoping review. No population of database search hits, screening flow, inter-rater agreement, or completeness claim is reported, because a systematic search log was not compiled for the underlying manuscript. The output is an interpretive framework and a jurisdiction-aware mapping, rather than an estimate of compliance levels or the prevalence of barriers.

The primary legal and policy corpus consists of Directive (EU) 2019/882, Directive (EU) 2016/2102, the United Nations Convention on the Rights of Persons with Disabilities, and the European Commission's Strategy for the Rights of Persons with Disabilities 2021–2030 (European Commission, 2021b; European Parliament & Council of the European Union, 2016, 2019; United Nations, 2006). Commission Implementing Decision (EU) 2021/1339 was used to verify the status of the standard cited under Directive 2016/2102, while EN 301 549 V4.1.1, the W3C specification for WCAG 2.2, and AccessibleEU guidance were consulted for technical content and the status of standards (AccessibleEU Centre, 2026; European Commission, 2021a; European Telecommunications Standards Institute et al., 2026; World Wide Web Consortium, 2023). The legal provisions were treated as primary authority; policy documents and technical guidance were used for context and not treated as equivalent sources of binding duties. Regulatory and technical status was rechecked on 19 October 2026.

The peer-reviewed literature corpus retained from the submitted version comprises 14 studies published between 2008 and 2026. They were selected purposively for their direct relevance to three strands: (a) conceptual approaches to disability, accessible destinations and social inclusion; (b) information needs, web accessibility and digital service coordination; and (c) traveler experience, autonomy and the management of multi-provider journeys. Foundational theoretical work was retained where it establishes concepts used in the study; empirical work was retained where it describes barriers or information needs at recognizable travel stages; recent reviews were used to position the argument in relation to newer scholarship. Studies mentioning disability or digitalization without a direct connection to these questions were not included. This transparent selection rationale does not constitute a replicable database-search strategy, and search yields or exclusion totals cannot be reconstructed. The revision adds primary technical and legal documents but does not claim an expanded sample of journal studies.

The synthesis proceeded through five steps. First, the scope and qualifications of Directive 2019/882 were identified at article and annex level for e-commerce, passenger transport, support services, microenterprise exemptions, and built-environment options. Second, these provisions were assigned to five functional travel stages: search and selection; booking and transaction; transport; accommodation and destination visit; and post-purchase support and continuity. Third, the studies were examined for documented barriers involving information, task completion, inter-provider coordination, and participation. Fourth, observations were categorized as (L) an applicable legal requirement under the EAA; (O) a distinct duty arising from another legal instrument; (T) a requirement of a technical standard or technical guidance whose legal effect must be established separately; or (M) a non-statutory management recommendation. For example, an applicable duty concerning accessible e-commerce functions is L; a public-sector website duty under Directive 2016/2102 is O; a provision of EN 301 549 examined on its own terms is T; and proposed destination-wide data sharing is M. Fifth, the mismatch between the regulated service and the end-to-end journey was organized into the three conceptual levels reported in Section 4.3. These labels distinguish the source and character of a claim rather than coding the frequency of an empirical observation.

Claims of binding legal effect were checked against the operative provisions of the relevant EU instrument; statements about the contents of V4.1.1 were checked against the published technical text; and claims about presumption of conformity were checked against the OJ citation decision and contemporaneous official guidance. The mapping can be audited by following the cited instruments and the stage-by-stage classifications in Table 1. It does not establish how many tourism operators comply, measure travelers' satisfaction, or compare transposition across all Member States. Nor does it demonstrate that the proposed framework predicts outcomes. Its value lies in separating legal scope, technical benchmarks, business recommendations, and questions that require subsequent empirical testing.

4. Results

4.1. The regulatory reach of the Directive across the traveler journey

The mapping shows that the Directive applies to different parts of the traveler journey under different legal categories. The strongest direct connections concern covered e-commerce transactions and defined passenger-transport functions, rather than travel as a single, indivisible experience. Each reference to an EAA requirement in Table 1 presupposes that the specific provider and activity fall within the Directive's scope and that the relevant exemptions and timing rules have been considered. Table 1 juxtaposes L (EAA coverage) and M (managerial recommendations). Obligations originating in other instruments (O) and technical standards (T) are addressed separately in Sections 2.3–2.4; they are not silently incorporated into the EAA column. The final column contains recommendations proposed by this study, not additional statutory obligations.

At the search and selection stage, the decisive legal category is the e-commerce service. When a website or application enables a consumer to conclude a distance contract for accommodation, transport, or another service, the relevant requirements of the Directive are triggered insofar as the provider falls within its scope. Accessible interfaces improve market access and reduce some of the barriers documented in earlier studies of tourism websites (Domínguez Vila et al., 2018; Eusébio et al., 2023). They do not, however, ensure that the provider holds complete and verifiable information on the physical accessibility of the service. In e-commerce, the Directive requires information on the accessibility of products and services to be provided when such information has been supplied by the responsible economic operator. This formulation does not automatically require every tourism accommodation provider to produce a fully standardized account of its accessibility characteristics.

At the stages of booking, identification and payment, regulatory coverage is more specific. These functions must be designed to be perceivable, operable, understandable and robust when provided as part of a covered service. The practical implication is that the online transaction can no longer be treated as a neutral technical tool; it forms part of service quality. For a traveler using assistive technology, the ability to complete a form, select dates, accept terms and complete payment without external assistance represents a form of autonomy. That autonomy, however, relates to the transaction and does not guarantee the suitability of the service being purchased.

In passenger transport, the Directive covers a broader range of functions. For air, bus, rail and waterborne services, requirements apply to websites, applications, electronic tickets, electronic ticketing, transport information and certain terminals. This includes information on the accessibility of vehicles, infrastructure and available assistance. The regulation addresses a critical stage of the journey, where the absence of timely information can prevent the entire trip from proceeding. The Directive operates alongside, and does not replace, the sector-specific rules on passenger rights.

The transition to accommodation and the destination visits reveals the principal limit of the European Accessibility Act. Online hotel booking may constitute an e-commerce service, but the Directive does not include accommodation, food services or visits to attractions as separate service categories subject to a general European rule on physical accessibility. Member States may extend the requirements of Annex III to the built environment in which covered services are provided, but this option does not create a uniform obligation across the Union's tourism environment. The result is a potential discontinuity between an accessible digital marketplace and less consistently accessible consumption at the destination.

For covered services, the Directive also sets requirements for accessible information and, where support services such as help desks or call centers are provided, for communication about accessibility and compatibility with assistive technologies (Annex I). The legal content of this duty should not be confused with the proposal that destination organizations develop shared service databases or undertake additional staff training. Such practices may improve service continuity, but they are recommendations derived from tourism-management research rather than requirements imposed by Directive 2019/882 on all destination actors.

Table 1. EAA legal coverage and non-statutory management responses across the traveler journey

Stage of the journey	EAA coverage (L), where applicable	What is not automatically ensured	Recommended management response (M)
Search and selection	Accessible websites and applications of covered services. The online sale of a tourism service may fall within e-commerce.	Completeness and accuracy of information on physical accessibility characteristics.	Verify content as well as the interface; maintain specific, reliable accessibility descriptions (M).
Booking, identification and payment	Accessibility of identification, security and payment functions in covered e-commerce services.	Suitability of the purchased service for the needs of the individual traveler.	Conduct assistive-technology and end-to-end transaction testing; link booking choices with verified service data (M).
Transport	Websites, applications, electronic tickets, information and certain terminals in covered passenger transport services.	Absence of all physical or organizational barriers during the journey.	Coordinate digital information, passenger assistance and on-site operations beyond covered functions (M).
Accommodation and destination visit	The online transaction may be covered as e-commerce. Member States may apply Annex III to the built environment of covered services.	A general EU rule on physical accessibility for hotels, restaurants, attractions and public space.	Use relevant national rules, voluntary universal-design policies and assessment of the visitor pathway (M).
Support and continuity	Accessible information from support services, where such services are provided.	Adequate staff knowledge and information exchange between different providers.	Introduce staff training, referral arrangements and shared data where practicable (M).

Source: Author's synthesis of Directive (EU) 2019/882 and accessible tourism studies. The final column contains recommended practices (M), not legal duties (L).

4.2. Gaps between regulatory compliance and functional access

The mapping identifies four categories of gaps. The first concerns the scope of the Directive itself. It regulates certain services and functions rather than the tourism journey as a single product. Regulatory continuity is therefore interrupted when the traveler moves from a covered digital environment to a service or space that does not fall directly within the Directive. This structure is consistent with the Act's character as an internal-market measure, but it does not mirror the logic of the customer journey, in which the user experiences services as an interdependent sequence.

The second category concerns differentiation between providers. Microenterprises providing services are exempt from the requirements of the Directive. In European tourism, this provision may create an uneven experience between large digital and transport systems and small providers of local services. This observation does not assess the policy justification for the exemption. It does show, however, that a destination cannot rely exclusively on implementation of the Directive if it seeks consistent accessibility across the entire local supply network.

The third gap concerns the distinction between technical access and the quality of information. The literature consistently shows that travelers require detailed, reliable and relevant information to determine whether they can use a service (Darcy, 2010; Eichhorn et al., 2008). A website may conform to the core principles of digital accessibility yet remain inadequate for decision-making if it describes a room simply as 'accessible' without measurements, photographs or information about the access route. Conversely, highly detailed content may remain practically unusable if it is not accessible to a screen reader. Both dimensions must be present.

The fourth category concerns coordination. The traveler experience is not usually controlled by a single economic operator. Accessibility may break down in the exchange of information between a platform, carrier, accommodation provider and local service provider. Cassia et al. (2020) identify precisely this need for coordination within digital ecosystems. The European Accessibility Act improves some of the conditions for exchanging and using information, but it does not itself establish a shared operational accessibility data model for the destination. To a considerable extent, this remains a matter of management and governance.

The four gaps identified here are conceptual results of the document and literature mapping, not observations of noncompliance in a sample of European tourism enterprises. Where sector-specific accessibility rules or national building requirements apply, a service may have legal duties beyond those analyzed under the EAA. References to incomplete EAA coverage must therefore not be read as an absence of regulation in those other legal regimes.

4.3. A three-level framework for assessing inclusion

The synthesis yields three interconnected assessment levels whose distinguishing feature is the separation of units of assessment and evidentiary requirements. A service-level legal review, observation of a connected travel task, and evidence of an individual traveler's experience answer different questions. These levels should therefore not be collapsed into a single compliance or inclusion score. They offer a conceptual sequence of assessment questions, not an empirically validated progression or scale.

The first level, regulatory accessibility, addresses the legally covered product, service, or economic operator. Assessment must identify the specific applicable provisions, relevant exemptions, and national implementation where necessary. Evidence may include legal-scope determinations, documented technical tests, and records required under the applicable regime. This level cannot be judged from a traveler's satisfaction report alone. Likewise, establishing conformity for an online booking transaction does not prove that the accommodation or the wider destination satisfies every accessibility requirement arising under other laws.

The second level is functional accessibility. The criterion moves from compliance by the individual service to whether the traveler can complete a function. For example, an accessible airline application has limited value if the process for requesting assistance is interrupted by an inaccessible external system. Similarly, an accessible hotel booking process is insufficient if staff cannot confirm the room's accessibility characteristics. Functional accessibility requires testing the transitions between channels, providers, and physical spaces.

The third level is lived inclusion. Here the criterion is the quality of participation. The relevant dimensions are autonomy, dignity, choice, predictability, safety, and participation without disproportionate dependence on others. This dimension relates to the findings of Devile and Kastenholz (2018) and Rubio-Escuderos et al. (2024), where experience is shaped by negotiation, support, and a sense of independence. Lived inclusion cannot be certified through technical testing alone. It requires the involvement of users themselves and evaluation of the actual journey.

The levels are related but should not be interpreted as a validated causal progression. A provider may voluntarily exceed an EAA minimum, and a person may complete a task while still experiencing restricted choice or excessive dependence on assistance. Conversely, a negative experience does not by itself establish a breach of the EAA. The framework's additional contribution beyond destination-experience and customer-journey models is to attach the question of legal attribution to each stage and to identify the type of evidence needed to move from compliance, to task completion, to experienced inclusion. It is a proposed interpretive tool; its empirical validity and discriminant usefulness remain to be tested.

Table 2. Three assessment levels, distinct units of evidence and management implications

Level	Central question	Indicative evidence or indicator	Unit of assessment and management use
Regulatory accessibility	Does the service comply with the applicable obligations?	Applicable provision; service scope; technical tests; compliance records.	Covered operator, product or service. Document the applicable legal duty.
Functional accessibility	Can the traveler complete the intended function without discontinuity?	Observed completion of booking, transport, check-in or communication across hand-offs.	End-to-end task or service pathway. Diagnose practical discontinuities.
Lived inclusion	Can the traveler participate with autonomy, choice and dignity?	Traveler-reported autonomy, range of choices, dignity, predictability and participation.	Individual lived journey. Co-design and evaluate experience quality.

Source: Author's conceptual synthesis informed by accessible tourism research and Directive (EU) 2019/882. The second and third levels are not presented as obligations created by that Directive.

4.4. Implications for businesses and destinations

A first management recommendation is to audit the complete traveler journey as well as individual digital systems. An information technology department may correct a booking interface while the reservations team still provides inaccessible attachments or imprecise information. A carrier may make its application usable while the journey to an assistance point remains unclear. End-to-end assessment can reveal these discontinuities, but it is proposed here as a service-quality practice and should not be described as a general legal requirement created by the EAA.

The second implication concerns data quality. Accommodation businesses and destination bodies require accessibility descriptions that are specific, up to date and comparable. General labels are insufficient for a heterogeneous public. This principle is already evident in earlier research on accommodation-information preferences (Darcy, 2010) and becomes more consequential in contemporary digital distribution, where the same information may be reproduced across multiple platforms. The management challenge is not merely to provide information, but to maintain its accuracy across every channel.

A further recommendation concerns third-party coordination. Booking platforms, payment processors, ticketing systems and communication suppliers affect the experience even when they belong to different legal entities. For activities within the scope of the EAA, the relevant provider must satisfy its own applicable legal obligations. Additional procurement clauses, data-sharing protocols and joint usability tests may reduce cross-provider barriers, but they are management measures whose adoption and allocation of responsibility depend on the institutional and contractual circumstances.

At destination level, accessibility requires coordination between public and private actors. Microenterprises providing services that are exempt from the requirements of the Directive may remain critical to the actual journey. A destination management organization can act as a hub for technical support, training and information standardization without altering the legal status of individual businesses. The literature on digital ecosystems suggests that the quality of an accessible experience depends on collaboration among multiple actors rather than isolated pockets of good practice (Cassia et al., 2020).

Finally, technical audits should be complemented by testing with real users. Automated tools are useful for identifying recurring technical errors, but they cannot fully assess whether language is understandable, whether information is sufficient for decision-making or whether a process places excessive cognitive demands on the user. Involving persons with different disabilities in design and evaluation connects the regulatory obligation with lived experience and reduces the risk of services being designed on the basis of assumptions about users' needs (Gillovic & McIntosh, 2020).

5. Discussion

The results show that the European Accessibility Act addresses some of the problems documented in tourism research for nearly two decades. Difficulties in accessing reliable online information, the inability to complete digital transactions and problems with transport interfaces are no longer solely matters of voluntary corporate practice for providers falling within the Directive. In this respect, the regulation can reduce certain barriers to entry into the tourism market and create a common accessibility threshold within the internal market.

This effect should not be overstated. Accessible tourism research has shown that barriers occur throughout the traveler journey and that experience emerges from the interaction of multiple services (Sugden et al., 2026). The Directive, by contrast, has a functional scope limited to specified products and services. The difference between the unit of regulation and the unit of experience explains much of the gap identified in this study. For the legislator, the object of concern is the accessibility of a particular service. For the traveler, it is the ability to complete the journey.

The greatest practical challenge arises where digital compliance meets the physical environment. The EAA may enable a user to purchase a service without digital exclusion, but the quality of that choice depends on the information available about the actual product. The studies by Eichhorn et al. (2008) and Darcy (2010) had already shown that rich and reliable information is a precondition for access. The current regulation improves the channel but does not by itself resolve the problem of content accuracy and standardization. This is especially apparent in accommodation, where physical accessibility remains linked to national standards, building regulations and operational practices.

The exemption for microenterprises makes the role of destination governance even more visible. The exemption has a clear proportionality rationale because smaller businesses have more limited resources. In a tourism destination, however, small businesses often provide services that shape the visitor's everyday experience. Focusing only on the obligations of larger providers may therefore produce an environment in which access to booking is consistent while the on-site experience remains fragmented. Local bodies can reduce this gap through shared tools, training and voluntary specifications that lower the cost of implementation for small businesses.

EN 301 549 V4.1.1 strengthens the technical discussion through its alignment with WCAG 2.2, provisions concerning user preferences and explicit mappings of relevant clauses to the EAA and WAD (European Telecommunications Standards Institute et al., 2026; World Wide Web Consortium, 2023). For booking and ticketing services, the newer criteria help identify concrete usability risks in keyboard focus, dragging interactions, target size, recurring help, redundant data entry and authentication. These criteria are useful prospective audit targets, but, at the 19 October 2026 cut-off, V4.1.1 had not been identified in the official sources consulted as an OJ-cited standard conferring a presumption of conformity. V3.2.1 continued to have that role under the WAD pursuant to the relevant implementing decision (AccessibleEU Centre, 2026; European Commission, 2021a). Compliance assessment must therefore state both the applicable legislation and the particular standard/version relied upon.

The framework contributes a jurisdiction-aware complement to existing accessible-tourism models. Previous work explains accessibility as an experience of the destination, a matter of social inclusion or a journey involving multiple suppliers (Darcy et al., 2020; Gillovic & McIntosh, 2020; Cassia et al., 2020; Sugden et al., 2026). This paper specifies how three different assessment questions can be kept separate. The first asks whether a defined operator or service meets an identified legal duty; the second asks whether an end-to-end travel function works in practice; the third asks whether users experience meaningful choice and participation. By distinguishing responsible actor, evidence and assessment unit, the model helps avoid inferring legal non-compliance from an unsatisfactory trip or inferring inclusion from a technically compliant website.

The theoretical contribution is thus one of structured differentiation and operationalization, not a claim to have discovered compliance, functionality or experience as new constructs. The EAA supplies a precisely bounded legal component; the traveler-journey literature explains the interdependence of tasks; disability and inclusion scholarship informs the criteria for judging participation. The combined model generates testable propositions for later research, for instance that improvements in interface

compliance need not correspond to improvements in continuity or reported autonomy. This proposition is advanced as a research question rather than as a causal finding of the present non-empirical study.

For organizations, the practical recommendations are to combine legal-scope reviews with user-centered service testing, reliable accessibility descriptions, staff capability and coordination with suppliers. They should be implemented according to available resources and applicable national and sector-specific rules. A destination body may support common information formats and voluntary supplier guidance, yet the EAA does not itself establish an across-the-board legal duty for every such body to organize destination-wide data sharing or co-design processes. Stating this boundary preserves the difference between law, technical specification and managerial discretion.

The study has four limitations. It is a purposive, non-systematic synthesis of a limited peer-reviewed corpus and does not provide a reproducible database search or report screening totals. It includes no interviews, observations, transactions, or technical audits of specific tourism services, so the proposed model is not empirically validated. It does not compare implementation across all 27 Member States or evaluate the national options available for the built environment. Finally, standardization and OJ citation may change after the documentary cut-off of 19 October 2026; the legal and technical position should be checked again immediately before publication. These limitations restrict any claims about compliance prevalence, effectiveness, or generalizability.

Conclusions

In response to the first question, Directive (EU) 2019/882 has a direct role in specified e-commerce and transport functions, subject to the provider, service, exemption and timing rules governing its application. The Directive is not a comprehensive Union-wide physical-accessibility code for tourism accommodation, attractions, or public spaces. Other EU, national or local duties may nonetheless govern those environments; the mapping does not imply their absence.

In response to the second question, the comparison identifies four conceptual sources of discontinuity: the selective scope of the EAA, differences between providers and exemptions, the divergence between accessible interfaces and reliable service information, and coordination problems across the journey. These are interpretive findings from the documents and literature, not measured failure rates. The three-level framework distinguishes proof of compliance, evidence of completed travel functions and user evidence of inclusive participation, allowing them to be evaluated without treating any one as a proxy for the others.

For the third question, the article recommends that businesses assess complete service pathways, the accuracy of accessibility information and interactions with suppliers, and that destinations facilitate collaboration where appropriate. Such measures draw on the tourism-management literature and may exceed the obligations of the EAA. EN 301 549 V4.1.1 offers a more detailed prospective technical benchmark, particularly for user preferences and WCAG 2.2 requirements, but its publication alone does not establish a new presumption of legal conformity.

Further work should test whether the three levels are distinguishable in real travel settings. A mixed-method design could first audit legally covered e-commerce functions against a specified applicable legal and technical benchmark; then observe end-to-end booking, transport and check-in tasks; and finally interview travelers about autonomy, choice, dignity and participation. Replication across different Member States and provider sizes would clarify how national law, exemption rules, destination policy and technical change shape the relationship between the three levels. The absence of such testing is acknowledged in the present conceptual contribution.

The European Accessibility Act creates a common legal foundation in areas where digital exclusion could prevent access to the tourism market before a journey even begins. A genuine transition toward inclusive tourism requires this foundation to be used as a starting point for service management that connects digital systems, physical space, human support and the participation of persons with disabilities themselves. It is at this point that accessibility either remains a compliance characteristic or becomes a quality of the tourism experience itself.

Authorship contribution: The sole author was responsible for the conceptualization, research design, documentary analysis, interpretation and preparation of the manuscript, and has responsibility for approving the submitted version.

Data Availability Statement: The study draws on publicly accessible EU and international legal instruments, technical standards and published academic works identified in the References. No primary participant-level dataset was created. The stage-based legal mapping and framework definitions are reported in the text and Tables 1–2.

Compliance with ethical standards: This documentary and conceptual study did not recruit human participants, collect personal data or conduct interventions. Accordingly, no human-participant ethics approval or informed consent was required for the activities described.

Funding: This research received no external funding.

Conflicts of interest: The author declares no conflicts of interest.

AI Use Declaration: OpenAI ChatGPT (GPT-6) was used to assist with manuscript drafting. The author has independently reviewed and verified all AI-assisted material against the relevant scholarly, legal and technical sources prior to resubmission. The author retains full responsibility for the intellectual content, the accuracy of the claims and references, and compliance with the journal's publication-ethics requirements.

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Abbreviations: EAA – European Accessibility Act; EU – European Union; ICT – Information and Communication Technologies; L – legal requirement under the EAA; M – proposed management practice; O – requirement under another legal instrument; T – technical standard or guidance; UNCRPD – United Nations Convention on the Rights of Persons with Disabilities; WCAG – Web Content Accessibility Guidelines; WAD – Web Accessibility Directive.

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