The voice of blind and partially sighted people in Europe

European Blind Union survey on the accessibility of payment terminals

EBU Report | June 2026

Executive summary

18 European Blind Union member organisations responded to our questionnaire on payment terminals accessibility. The picture is consistent across the sample. Touchscreen payment terminals that lack tactile reference, audio output, and headphones support are already widely deployed across Europe, and their share is growing rapidly. Such terminals render independent usage impossible for blind and partially sighted customers. The default workarounds are disclosure of the PIN to the cashier, use of a mobile wallet, or abandonment of the transaction.

A small number of countries report meaningfully accessible solutions in field deployment.

The French response reports Cartes Bancaires accessibility specifications developed over a two-year programme and now used for CB certification, with public certification entries identifying PAX A77 CT / A77 CTL variants.

Spain, through ONCE, has deployed the ONCE Point of Sale, which combines accessible software, on-screen tactile markers, haptic feedback, and physical tactile marks on the screen itself. The solution is already deployed on more than 20,000 terminals across Spain, and several other stakeholders in the country have incorporated the software component into their own terminals.

In the United Kingdom, RNIB has worked with UK Finance and multiple manufacturers over several years to develop and test a speech and beeps interaction method, a 200-point accessibility assessment checklist, and an industry compliance framework.

The European Accessibility Act (Directive (EU) 2019/882) has been in force since 28 June 2025 in most EU member states. Respondents from Austria, Finland, Germany, the Netherlands, and Switzerland each

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observe that long transition and grandfathering periods allow inaccessible terminals to remain in service for years, meaning blind and partially sighted customers may continue to face barriers even after the legal framework has entered into force.

Switzerland has imposed voice output for new market approvals through its approval authority (not through legislation) from January 2025.

Norway has declared touchscreen-only terminals illegal discrimination in principle, although enforcement in practice depends on individual complaints.

The main cross-country recommendations emerging from the sample are:

- mandatory voice output and private audio (headphones) support on every terminal;
- tactile reference marks on the screen;
- a single European technical standard that manufacturers adopt so users are not forced to re-learn each brand;
- a prohibition on randomised PIN-pad layouts;
- a remedy for the existing stock of inaccessible devices, not only for new market approvals.

Survey methodology

The following **five questions** were asked in the questionnaire:

1. What types of payment terminals are most commonly used in your country?

a) Traditional terminals with a physical keypad;

b) Touchscreen terminals (PIN entry on screen);

c) Both types in widespread use.

Please include, where possible, an estimated percentage of terminals in your country that are touchscreen.

2. For touchscreen terminals, please describe the full payment process step by step, from the moment the clerk hands you the terminal until the transaction is complete. What do you see, hear, or feel at each stage? Where possible, include a photograph, short video, or audio recording to illustrate.

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3. What accessibility features are missing from touchscreen payment terminals in your country? What barriers do blind or partially sighted users encounter during the payment process?

4. Are you aware of any accessible payment solutions currently available or being tested in your country? If so, please describe briefly.

5. Has your country taken any regulatory or policy steps regarding accessible payment terminals? If so, please describe.

We received 18 national contributions, i.e., from Austria, Belgium, Croatia, the Czech Republic, Denmark, Finland, France, Germany, Hungary, Iceland, Lithuania, Netherlands, Norway, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom.

Issues across the sample

The issues (12) are presented in decreasing order of how strongly and widely they were reported.

1. Flat touchscreens without tactile reference make independent PIN entry impossible

Raised by nearly every responding country: Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, Germany, Hungary, Iceland, Lithuania, Netherlands, Norway, Slovenia, Sweden, Switzerland, and the United Kingdom.

On a traditional physical keypad, a blind user may locate digit "5" by touch. It carries a raised dot or notch that every payment terminal has followed for decades. From the "5" key, every other digit lies one or two positions away in a predictable grid, which permits PIN entry without sight of the keypad.

A touchscreen offers no such reference. The glass is uniform, the digits are rendered by software, and in some cases their positions vary between devices, or even between transactions on the same device. The Austrian response states: the keypad carries no tactile reference points, and, unlike physical keypads, there is no tactile marker on the number 5 to support orientation. In the absence of built-in speech, haptics, or a private audio channel to convey which digit lies under the finger, independent PIN entry is physically impossible.

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2. No audio output, no headphone jack, no private audio channel

Raised by Austria, Belgium, Croatia, Czech Republic, Finland, Germany, Iceland, Lithuania, Norway, Slovenia, Sweden, Switzerland, and the United Kingdom.

The most direct remedy for a flat touchscreen is audio: the device announces what lies under the user's finger during exploration and confirms each selection. Spain's ONCE Point of Sale and the UK speech and beeps method tested through RNIB both operate on this principle. Most other responses describe devices that do not yet provide this support. The response from Germany states that neither voice output nor a headphone jack is available as standard. Switzerland reports that payment terminals in Switzerland do not yet have voice output and that the payment process therefore relies on trust and is not accessible. The Swedish respondent inspected devices specifically for tactile buttons and for the option to connect headphones or earbuds for audio guidance; none of the tested terminals offered these features.

Two consequences follow, beyond the immediate accessibility gap:

- Speech cannot be delivered over a loudspeaker in a checkout queue, because anyone in the vicinity could hear the PIN. A physical headphone socket or a secure wireless pairing is therefore required.
- The blind user needs navigation feedback, such as which button the finger currently rests on, without the digits being announced audibly. Spain addresses this by speaking "first digit", "second digit", and so on, without speaking the number itself; the UK method uses beeps. Both approaches require the terminal to provide private audio hardware. Most deployed devices across Europe lack that basic hardware.

3. Forced PIN disclosure is a common workaround where accessible PIN entry is unavailable

Raised explicitly by Austria, Belgium, Croatia, Denmark, Finland, Hungary, Lithuania, and Norway.

Where a blind customer cannot enter the PIN independently and contactless payment is unavailable, typically because the transaction exceeds the contactless limit, the only practical means of completing the transaction may be to communicate the PIN to the cashier or a companion for entry. Most card-issuing banks in Europe explicitly prohibit this practice under the cardholder agreement. Should the PIN

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subsequently be misused, the bank may refuse to reimburse the loss on the ground that the customer disclosed the code.

The Danish response illustrates what occurs when disclosure is refused. Sharing the PIN is prohibited for security reasons; a blind customer who cannot enter it independently is forced to pay by cash, where cash is accepted, or by other means. Where no alternative is available, the customer may be unable to conclude the purchase, for example where the haircut has already been performed, or the pizza already consumed. Such situations can become uncomfortable or tense between the visually impaired customer and the staff of the establishment concerned.

4. No way to verify the amount before confirming

Raised by Belgium, Germany, Hungary, Iceland, Lithuania, Norway, and Switzerland. The issue affects both touchscreen and keypad terminals; mobile-wallet workarounds notify the user only after payment.

Before a sighted customer authorises a payment, they consult the terminal to confirm the amount the cashier has entered. This step matters because cashiers occasionally enter the wrong amount, whether in error or intentionally, and the customer catches the discrepancy before PIN entry or card presentation. A blind customer has no equivalent way of checking the amount before confirming the transaction. The Lithuanian response states: the process is based entirely on trust in the service provider, which is neither acceptable nor convenient, and the Lithuanian contribution explicitly calls for a means to verify the amount independently before confirming the transaction.

On mobile-wallet solutions, the problem shifts but does not disappear. Users may receive a notification of the amount paid after the fact, with no itemised receipt against which to compare the charge. Lithuania notes that the phone's screen reader announces the amount only after the transaction has completed. A subsequent dispute requires chargeback paperwork with the bank rather than a correction at the till. The issue applies equally to honest error and to fraud; in both cases, the blind customer lacks an independent check at the moment of authorisation.

5. Randomised PIN-pad layouts defeat accessibility

Raised explicitly by Belgium, Germany, Slovenia, and the United Kingdom.

Certain touchscreen terminals shuffle the digit layout for every transaction. The "1" may appear in the top-left for one customer and in the bottom-right for the next. The design intent is security: a shoulder-

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surfer who observes where the cardholder's finger moves cannot infer the PIN, because the layout changes each time. The Slovenian response confirms this pattern: “in Slovenian bars and shops, noting that the number pad is often too small and, in some cases, randomised for each transaction, so that the layout changes in place of following a standard telephone or computer keypad layout.

For a partially sighted user with residual vision, this security feature is precisely the element that breaks accessibility: while randomisation may increase security, it constitutes an additional barrier for partially sighted people who may still recognise the buttons but cannot decipher the numbers. For a fully blind user relying on speech feedback, the random layout also invalidates any learned muscle memory and disables the user for entering their PIN.

6. Tip, donation, and extra-question screens are inaccessible

Raised by Belgium, Denmark, Germany, Slovenia, and Sweden. The pattern is common in several restaurants and bars, where the prompt appears before the payment flow itself.

Before the payment amount appears on screen, many restaurant and bar terminals present a tip prompt as preset buttons, for example 10%, 15%, 20%, or no tip. Others display a donation prompt for a charity. The Swedish response captures the customer's experience directly: after placing the order, the customer was required to answer a question about tipping by selecting one of four screens with varying percentages or no tipping, and only after clearing that screen did the payment process itself begin. Clearing the tipping screen required staff assistance, because no feature allowed the customer to bypass it independently.

The Danish response extends: an additional step may be activated before final payment confirmation, asking whether to tip the staff, and, if so, requiring an amount. This requires sighted assistance irrespective of whether the terminal has physical buttons. The Slovenian response adds that it is common in bars to encounter a tip prompt without clear notice, which may result in an accidental tip to the waiter (in Slovenia, tipping is optional and not customary). A blind customer cannot see these prompts, and where no audio or haptic feedback is present, the customer may tap where the payment screen is expected to appear, inadvertently select the highest tip, or remain trapped on a screen from which they cannot navigate away. The pattern is not edge-case behaviour; it recurs routinely at every restaurant visit.

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7. Visual accessibility for partially sighted users is also missing

Raised by Austria, Croatia, Germany, Slovenia, Sweden, and the United Kingdom.

Partially sighted clients require high contrast, enlarged text, and adjustable display options. The response from Germany notes the absence of visual accessibility options, including adjustments for contrast, font size, and colour schemes. The Croatian contribution indicates that, for partially sighted users, touchscreen sensitivity, low contrast, and small or unclear interface elements render PIN entry difficult and error-prone, and that larger, higher-contrast numbers would improve reliability.

The Swedish response documents a specific failure: In the terminal Sweden tested, the screen was mainly white with black text, and for partially sighted users with light sensitivity it became difficult to see anything on the screen. No option existed to invert to dark mode or to enlarge the text. Users with light sensitivity, a condition common after certain eye surgeries and with specific eye conditions, find such a screen unreadable and must hand the card to the cashier for any transaction. The RNIB checklist treats visual design as a first-class accessibility requirement alongside audio, precisely because the partially sighted population is the majority of users with a visual impairment. Designing solely for fully blind users leaves the larger group unsupported.

8. The EAA transition period keeps inaccessible devices in service

Raised by Austria, Finland, Germany, the Netherlands, and Switzerland.

The European Accessibility Act entered into force on 28 June 2025. In principle, new payment terminals placed on the market from that date onward must meet accessibility requirements. In practice, every national transposition contains a grandfathering clause: terminals in service on that date may continue until the end of their economic life. For ordinary retail card terminals, this may extend another five to seven years. For self-service terminals (unattended payment machines, ticket kiosks), which are built to industrial lifespans, Austria reports up to 20 years. The Austrian response states that self-service terminals may continue to be used until the end of their economic life, which can be up to 20 years after installation, and that, consequently, inaccessible payment terminals are still widely encountered in everyday situations in 2026 despite the legal framework. The German response adds a further dimension: a

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large number of non-accessible payment terminals were brought onto the market in the run-up to the EAA coming into force on 28 June 2025.

The practical consequence is that the legal framework does not immediately solve the problem for blind customers at the checkout. A blind user in 2026 is often still presented with a pre-EAA device that may remain in service for years. The responses from Austria, Finland, Germany, the Netherlands, and Switzerland identify this as a central policy gap. The legislation addresses the pipeline for new devices, but does not fully address the stock of devices already in the field. In the absence of a retrofit obligation or a firm end-of-service date, the deployed base may remain the primary user experience well into the 2030s.

9. Brand fragmentation defeats user learning

Raised by the Czech Republic, the Netherlands, Sweden, and the United Kingdom.

Accessible payment terminals currently use different interaction models. One device may require a triple-tap to activate accessibility mode; another may require a three-second press on the "5" key; a third may use a dedicated button on the housing. Once inside accessibility mode, finger-slide navigation, audio cues, and confirmation gestures also vary between devices. The Czech Republic response is the most explicit on the remedy: the crucial matter is unification, because people with visual impairments should be able to learn one method for using a touchscreen terminal with a voice guide. The sample therefore points toward a single European technical standard, not because any one national solution is inadequate, but because the absence of a shared model forces users to relearn the process across brands and shops.

10. Existing accessibility features are unknown to users and to merchants

Raised by the Czech Republic and the Netherlands. Where accessible terminals are deployed, they are not used because neither end of the counter knows they exist.

An accessible terminal that nobody knows how to activate is, for practical purposes, an inaccessible terminal. The Netherlands: problems with payments frequently occur at touchscreen payment terminals even where accessibility features are present, because those features are unknown to both parties or their operation is unclear. The Dutch contribution gives two concrete examples. A large Dutch retail chain with

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a delivery service has recently switched to payment terminals with touchscreens, and both the grocery delivery companies and their customers are often unfamiliar with the operation of the accessibility features. Delivery services of other retail chains have also switched to new touchscreen payment terminals that do carry accessibility features, but those features are insufficiently known among customers and retailers, with the result that they are not used at all or only incidentally.

This is a training and communication failure layered on top of the hardware failure. Three elements that the market has not delivered are required to remedy it:

clear user-facing documentation from the device manufacturer, mandatory merchant training at the point-of-sale level, and a consistent discoverable gesture (identical across manufacturers) that a blind user can attempt first on any unfamiliar device. The problem is structural and points back to the need for a standard interaction model.

11. Inconsistent placement of the contactless and NFC area

Raised by Belgium, Finland, and Lithuania.

Contactless payment, where the card is tapped against the terminal, is the one current-hardware workflow that works well for blind customers, provided the amount is below the PIN-required limit. It requires no screen interaction and no typing. The difficulty lies in locating where to tap. Different devices place the NFC antenna in different positions: the top of the screen on some, the centre on others, the back of the device on a third group. The Belgian response describes the problem: the NFC area is not in the same place on all devices, and the user risks accidentally activating something on the touchscreen while attempting to tap the card.

12. Self-checkout payment is a related problem

Raised by Germany, Iceland, and Sweden. Outside the questionnaire's primary focus, but repeatedly flagged as a parallel problem.

Retailers across Europe are transferring customers from staffed tills to self-checkout lanes, where customers scan their own items, pack their own bags, and pay on a touchscreen. Every accessibility problem identified above is compounded. No cashier is present to whom the card can be handed as a fallback; the screen prompts are more complex (bagging confirmation, age-restricted product checks, loyalty-card prompts); and item scanning itself is visual. The Icelandic response notes that the self-service concept is general and that, so far as the respondent is aware, no accessibility settings are present; one

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supermarket is working on a pay-and-go solution that permits item scanning while shopping, but it remains a local solution for tech-skilled users.

Deployed solutions and active pilots

France, Cartes Bancaires accessibility specifications and PAX A77 CT / CTL certification entries

The French response cites two years of technical specifications developed with Cartes Bancaires, now used for CB certification. Public certification entries identify PAX A77 CT / A77 CTL variants. The accessible flow on touchscreen terminals operates as follows: a slashed-eye icon appears for partially sighted mode; a three-second finger press anywhere on the screen activates blind mode; the screen blanks for privacy; a voice-guided virtual keypad appears with the layout 1-2-3 / 4-5-6 / 7-8-9 / Cancel-0-Confirm; finger-slide navigation produces beeps and vibration per key shift; double-tap confirms. On keypad terminals, the same accessibility mode is activated by holding the 5 key for three seconds. Partially sighted users receive two contrast options (black on white or white on black) and adjustable font size.

Open gap: no comprehensive inventory of deployed devices is available, and a train-the-trainer programme is under development.

Spain, ONCE Point of Sale

The Spanish response describes the ONCE Point of Sale, which combines four components: accessible software, on-screen tactile markers, haptic signals, and tactile marks at both sides of the screen. Physical markers are placed on the screen itself: X on the cancel button, 0 on the accept button, and a raised point over the number 5. The keypad sits in the upper portion of the screen so that the user can orient with the top edge and locate the accept and cancel marks at the bottom. PIN-entry voice feedback follows a privacy-preserving pattern: after each double-tap the terminal announces "first digit", "second digit", and so on, without speaking the number itself. Spain reports the highest touchscreen share in the sample at 90 percent. The ONCE solution is already deployed on more than 20,000 terminals, and other Spanish stakeholders have incorporated the software component into their terminals.

Spain also proposes a tiered minimum requirement: new Points of Sale must carry all three elements (software, on-screen tactile markers, and

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haptics); existing Points of Sale in circulation must carry at least the software and the on-screen tactile markers.

Spain/ONCE, Point of sale accessibility features (video)

United Kingdom, RNIB and UK Finance

The UK response, from RNIB, describes a developed industry-assessment model built with UK Finance and manufacturers.

The PAX A920 "speech and beeps" method

RNIB and UK Finance have worked for years with multiple manufacturers on a consistent "speech and beeps" method. The stated aim, in RNIB's own framing, is "to provide consistency across the board, so that payment in one shop is not massively different from paying for something in another shop." The PAX A920 demonstrates the method. the method itself has been adopted by several manufacturers beyond PAX. In a typical transaction on a certified device, the blind customer activates accessibility mode; the terminal blanks the visible PIN pad so that a shoulder-surfer cannot see where the finger lands; the customer slides a finger across the keypad area, hearing beeps as each key is crossed; and double-taps to confirm each selection. The method was refined over several years of user testing with blind and partially sighted users at RNIB.

PAX A920 Accessibility Mode (video)

The 200-point accessibility assessment

RNIB has developed a 200-point accessibility assessment checklist for touchscreen PIN pads. The checklist covers speech output, beeps, clear visual design for users with residual vision, keypad layout, activation gestures, error recovery, and the interaction between accessibility mode and the normal sighted flow. It is derived from extensive user testing with blind and partially sighted users conducted over several years. The checklist forms the basis of RNIB's assessment of devices presented to UK Finance for accessibility approval, and RNIB is currently aligning it with the European standard EN 301 549, the accessibility standard that underpins the EAA. The UK response notes that, alongside speech and beeps, clear visual design ranks very high on the list, in order to ensure that as many people as possible with useful residual vision can pay independently.

The industry compliance framework

UK Finance, the trade association for UK banks and card issuers, maintains an industry approval process built on top of the RNIB assessment work. Devices that pass RNIB's assessment appear on a public approved-device list, flagged in the "Accessibility Approval" column with a year and the letter T, visible on pages 10 to 14 of the public approvals PDF. The published framework consists of three documents that together form the compliance basis against which manufacturers build:

- UK Finance, Card terminal security and accessibility (policy and guidance page)
- UK Finance, Scheme description and approvals list (PDF) - accessible devices are listed on pages 10 to 14
- UK Finance, Touchscreen Accessibility (PDF) - the requirements document against which manufacturers build.

RNIB performs the testing and maintains the technical assessment; UK Finance maintains the industry-facing approval process and publishes the list; manufacturers build to the published requirements and submit devices for RNIB assessment. No other country in the survey reports a comparable structure.

The method is accessible, and trained blind and partially sighted users can complete transactions independently on certified devices. First-time use in a busy shop, however, remains difficult, and RNIB notes that not every blind or partially sighted user can use the method accurately and confidently even after several attempts; the method raises the floor, it does not eliminate the problem.

RNIB reports that, in the UK, PIN-pad digits are currently not allowed to be spoken even through headphones for security reasons, so users must rely on beeps. RNIB is seeking to change this requirement and has asked EBU to check whether similar restrictions exist elsewhere.

Czech Republic, Global Payments voice guide (in testing)

SONS is testing a voice guide incorporated into Global Payments touchscreen terminals. The Czech response describes the solution as usable for blind persons, with some weaker aspects, and indicates that the manufacturer is open to improvement. Wide deployment has not yet occurred.

Hungary, Qvik instant payments

Qvik is Hungary's instant-payment system, operated by the Magyar Nemzeti Bank, and live since 1 September 2024. Two variants exist: Qvik-QR, in which the terminal displays a dynamic QR code that the customer scans with a bank app on a smartphone; and Qvik-NFC, in which the customer taps the phone to the terminal and the bank app completes the transaction. The scheme is mandatory for banks but optional for merchants. The Hungarian response notes the limited adoption to date: the solution is currently available only at stores belonging to one Hungarian grocery chain, while the other major chains (Lidl, Aldi, Spar, Tesco) have not introduced it and have no plans to do so.

Switzerland, voice output for new market approvals

The Swiss response reports a regulator-imposed rule. From January 2025, payment terminals seeking new market approval in Switzerland must include voice output. The requirement is specified by the approval authority through technical specifications, not by the legislator. It covers only new approvals; existing devices are not required to be retrofitted. PIN digits are indicated acoustically rather than spoken aloud.

A Swiss follow-up response also points to EP2's March 2026 announcement that Abrantix certified the first terminal according to ep2 specification 8.2.0, illustrating how the new approval requirement is beginning to enter the certification pipeline.

In addition, TWINT, the Swiss mobile wallet, is described as fully accessible alongside cash.

Belgium, bank-app QR flow and screen curtain

The Belgian response endorses the bank-app QR-code flow as the forward-looking path. The terminal displays a QR code; the user scans it with the phone; and the transaction completes inside the bank app on the phone, where the user's own assistive-technology stack takes over.

"The assistive technology on the user's phone allows to complete the process independently and privately (e.g. screen curtain) in a familiar user interface environment.", Belgium

Caveat: the bank apps themselves must conform to accessibility guidelines, failing which the flow merely shifts the point of failure.

Netherlands, research and policy-venue work

The Dutch response (prepared at Oogvereniging) reports parallel work streams. Betaalvereniging Nederland (the Dutch Payment Association) has carried out research with Oogvereniging on accessible payments. A 2024 Accessibility Monitor on payment services found that accessibility for people in a vulnerable position still lags behind that of the average consumer. Policy work continues through the Maatschappelijk Overleg Betalingsverkeer (MOB), the Dutch payments-sector consultation body, which agreed an Action Plan on Accessible Payments in 2021, and through the Accessibility and Reachability Working Group (WTB). A recurring frustration surfaces in the Dutch response: varied suppliers and working methods make it difficult for users to determine precisely what is missing from the accessibility solutions. Restaurant touchscreens that appear only after the meal create what the response terms "an acute payment problem".

Mobile wallets as the universal workaround

Apple Pay, Google Pay, Samsung Pay, and national equivalents (Swish in Sweden, MobilePay in Finland and Denmark, TWINT in Switzerland) are the practical workaround in nearly every country: Austria, Belgium, Czech Republic, Denmark, Finland, Germany, Hungary, Iceland, Lithuania, the Netherlands, Norway, Sweden, and Switzerland. Two common caveats apply: wallets bypass the PIN-entry problem at the terminal but do not permit verification of the amount before authorisation; and they exclude users without smartphones (the Danish response notes that "many of our members are not users of smartphones").

Regulatory landscape

The European Accessibility Act (EAA)

The transposition of the Directive (EU) 2019/882 is the dominant frame. Every EU respondent points to national legislation implementing the Directive, in force since 28 June 2025 in most member states. The common complaint across the sample concerns the long transition and grandfathering period: the EAA permits pre-existing terminals to remain in service until the end of their economic life, which for self-service terminals can extend to 20 years.

Country-specific frameworks beyond the EAA

France, Cartes Bancaires technical specifications. A significant industry-side requirement reported in the sample. Developed with the

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French blind-union organisation over two years, published by CB, and mandatory for certification.

Switzerland, approval-authority voice-output requirement. Specified by the approval authority through technical specifications since January 2025. The requirement covers only new market approvals and does not retrofit existing devices.

United Kingdom, RNIB and UK Finance partnership. An industry-side compliance framework comprising the UK Finance scheme description, the approvals list, and the Touchscreen Accessibility document (URLs provided in the section above). The RNIB 200-point accessibility assessment is being aligned with EN 301 549.

Netherlands, MOB Action Plan on Accessible Payments (2021). A sector-wide plan agreed in the MOB, the Dutch payments-consultation body. EAA-implementing legislation has applied from 28 June 2025, but only to terminals purchased on or after that date.

Norway, discrimination framework. Touchscreen-only terminals have been declared illegal discrimination in principle. Enforcement depends on individual reporting; meanwhile, new terminals continue to be sold.

Belgium, 2021 advisory. The Belgian National Higher Council for Persons with Disabilities issued an opinion in 2021 on the proliferation of inaccessible touchscreen terminals. The Belgian response reports that the advisory has had no observable impact.

Belgian advisory: ph.belgium.be/nl/adviezen/advies-2021-05.html

Lithuania, official obligation in preparation. LASS has secured an official obligation to make payment terminals accessible; implementation is currently being monitored.

Czech Republic, awaiting a European standard. SONS reports that the Czech Republic is awaiting a new European-level technical standard, and that SONS promotes the EBU guidelines for payment terminals in the interim.

Denmark, institutional gap. The Danish response reports that the responsible ministry assumed the market would address the issue; the country now faces a serious issue in which no institution is willing or able to take responsibility.

Named legal instruments with links

Directive (EU) 2019/882 (European Accessibility Act), the parent instrument.

Hungary, Government Decree No. 605 of 2022, implementing Act XVII of 2022 on accessibility requirements for products and services.

Hungary, MNB Recommendation No 6/2025 (VI.16.) (PDF) from the Magyar Nemzeti Bank.

Slovenia, Accessibility of Products and Services for Persons with Disabilities Act (PISRS)

Spain, Law 11/2023 on general accessibility (BOE)

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 40 national members including organisations from 26 European Union member states, candidate countries and other countries in geographical Europe.

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