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Accessibility Laws by Country

International legal requirements for digital accessibility

Prepared by: Halytic

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Standards: ADA, Section 508, EN 301 549, AODA, DDA

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Overview

Digital accessibility requirements are embedded in civil rights, equality, and consumer-protection laws across major jurisdictions. Although **WCAG 2.1/2.2 Level AA** is the de facto technical benchmark, enforcement models, penalties, and applicable entities vary. This guide summarizes key laws, standards, enforcement bodies, penalties, and notable cases across:

- **United States** (ADA Title III, Section 508, state laws)
- **European Union** (EN 301 549; European Accessibility Act)
- **United Kingdom** (Equality Act 2010; Public Sector Regulations 2018)
- **Canada** (AODA; Canadian Human Rights Act)
- **Australia** (Disability Discrimination Act 1992)
- **New Zealand** (Human Rights Act; NZ Web Standards)
- **Japan** (Act on Elimination of Discrimination; JIS X 8341-3)
- **India** (Rights of Persons with Disabilities Act 2016)
- **Brazil** (Brazilian Inclusion Law – LBI)

Fast Reference Table

Region	Primary Law(s)	Technical Standard	Enforcement	Penalties (illustrative)
US	ADA Title III; Section 508; state laws	WCAG 2.0/2.1 AA (DOJ/OCR guidance); 508 aligns to WCAG 2.0 AA	DOJ, HHS OCR; private suits	Civil penalties up to \$75k (first), \$150k (subsequent) under ADA; settlements & fees common
EU	Web Accessibility	EN 301 549 (maps to WCAG	National authorities	Administrative penalties; can

	Directive; European Accessibility Act (2025)	2.1 AA)		reach up to 2% of turnover (member-state dependent)
UK	Equality Act 2010; Public Sector Regs 2018	WCAG 2.1 AA (gov't guidance)	EHRC ; Central Digital & Data Office for public sector monitoring	Unlimited civil fines; enforcement notices & litigation
Canada	AODA (Ontario); CHRA (federal)	WCAG 2.0/2.1 AA (AODA regs)	AODA enforcement units; CHRC	Up to \$100,000 CAD per day for AODA non-compliance
Australia	DDA 1992	WCAG 2.0 AA (gov't policy)	Australian Human Rights Commission	Enforceable undertakings; fines up to \$100,000 AUD (case dependent)
New Zealand	Human Rights Act; NZ Govt Web Standards	WCAG 2.1 AA (recommended)	NZ Human Rights Commission	Mediation → orders; penalties vary
Japan	Act on Elimination of Discrimination	JIS X 8341-3:2016 (WCAG-aligned)	MHLW & relevant ministries	Administrative guidance; penalties vary
India	RPwD Act 2016 ; GIGW	WCAG 2.0 AA for gov't; GIGW 3.0 (WCAG 2.1 aligned)	Chief Commissioner & State Commissioners	Fines; directions to comply; amounts vary
Brazil	LBI	WCAG 2.0 AA (public sector)	Federal & state authorities	Administrative fines; amounts

United States

Americans with Disabilities Act (ADA) – Title III

Scope: Places of public accommodation (including e-commerce and service websites).

Standard: DOJ guidance points to **WCAG 2.0/2.1 Level AA** as the acceptable benchmark for web content.

Enforcement: **Department of Justice (DOJ)** and private right of action; **HHS OCR** for healthcare-related entities.

Penalties:

- First violation: up to **\$75,000**
- Subsequent violations: up to **\$150,000**
- Private lawsuits may seek injunctive relief, damages under some state laws, and **attorneys' fees**.

Key Cases:

- **Domino's Pizza v. Robles (2019)** – Supreme Court denial of cert let stand the Ninth Circuit decision that ADA applies to websites/apps linked to physical places; businesses must provide accessible digital experiences.
- **Gil v. Winn-Dixie (2017; subsequent appeals)** – Federal court found website barriers violated ADA; case drove industry adoption of WCAG AA remediation and structured settlements.

Section 508 of the Rehabilitation Act

Scope: **US federal agencies** and vendors providing EIT to them.

Standard: **WCAG 2.0 Level AA** via the 2018 "508 Refresh."

Enforcement: Agency Inspector Generals, **GSA**, and civil rights processes; procurement consequences for vendors.

State Laws

- **California: Unruh Civil Rights Act** (via ADA violations), **Unfair Competition Law**.

- **New York: NY State Human Rights Law** and NYC Human Rights Law.
Trend: Plaintiffs often file in NY/CA; settlements typically require WCAG AA conformance and independent verification.
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European Union

EN 301 549 & Web Accessibility Directive

Scope: Public sector websites and mobile applications; several member states extend to broader sectors.

Standard: **EN 301 549** (currently mapping to **WCAG 2.1 AA**) with additional requirements (documents, software, hardware).

Enforcement: **National monitoring bodies** (reports to the Commission).

Penalties: Administrative sanctions; member states may levy significant fines.

European Accessibility Act (EAA) – 2025

Scope: Private-sector products and services (e-commerce, telecom, banking, e-books, transport, media equipment).

Obligations: Accessibility-by-design, information accessibility, and conformity assessments.

Penalties: Member-state defined; several models allow fines up to **~2% of annual turnover** for systemic non-compliance.

Member State Notes:

- **France:** RGAA (WCAG-based) for public bodies; publication of accessibility statements and audits.
 - **Germany:** BITV 2.0 (WCAG-based) with monitoring and complaint procedures.
 - **(Post-Brexit UK handled below)**
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United Kingdom

Laws: **Equality Act 2010** (duties to make reasonable adjustments) and **Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018**.

Standard: **WCAG 2.2 Level AA** for public sector; Equality Act applies broadly.

Enforcement: **Equality and Human Rights Commission (EHRC)**; Central Digital &

Data Office monitors public sector compliance.

Penalties: Unlimited fines; enforcement notices, litigation, and reputational risk (publication of non-compliance).

Canada

Laws: Accessibility for Ontarians with Disabilities Act (AODA); Canadian Human Rights Act and emerging federal Accessible Canada Act (ACA) obligations.

Standard: AODA requires **WCAG 2.0 AA** (many entities now target 2.1 AA).

Enforcement: AODA enforcement units (inspections, orders); **CHRC** for federal discrimination matters.

Penalties: Up to **\$100,000 CAD per day** for AODA non-compliance; naming-and-shaming via public reports.

Australia

Law: Disability Discrimination Act (DDA) 1992.

Standard/Policy: Australian government policy requires **WCAG 2.0 AA** for government websites; many private orgs adopt the same.

Enforcement: Australian Human Rights Commission (complaints, conciliation, enforceable undertakings).

Penalties: Case-dependent; fines up to **\$100,000 AUD** have been imposed; settlements frequently require WCAG AA remediation and monitoring.

New Zealand

Laws/Policy: Human Rights Act 1993 and NZ Government **Web Standards** (WCAG 2.1 AA recommended).

Enforcement: Human Rights Commission (complaints, mediation; Human Rights Review Tribunal orders).

Penalties: Remedies and orders vary; reputational and procurement risks are significant.

Japan

Law: Act on the Elimination of Discrimination against Persons with Disabilities.

Standard: JIS X 8341-3:2016, aligned with WCAG 2.0/2.1.

Enforcement: Ministry of Health, Labour and Welfare (MHLW) and sectoral ministries.

Penalties: Administrative guidance and corrective directions; penalties vary by context.

Practice: Government and large enterprises publish conformance reports for JIS 8341-3.

India

Law: Rights of Persons with Disabilities (RPwD) Act 2016; government standards via GIGW (currently mapping toward WCAG 2.1).

Requirement: WCAG 2.0 AA minimum for **government** sites; strong push toward 2.1 AA.

Enforcement: Chief Commissioner for Persons with Disabilities (and state counterparts).

Penalties: Monetary penalties and directions to comply; amounts vary.

Brazil

Law: Lei Brasileira de Inclusão (LBI) – Brazilian Inclusion Law.

Requirement: WCAG 2.0 AA for public sector (increasingly adopted by private sector).

Enforcement: Federal and state authorities; Public Prosecutor's Office may bring actions.

Penalties: Administrative fines and corrective measures; amounts vary by case.

Best Practices for Global Compliance

- **Adopt WCAG 2.2 AA** as a global baseline; document exceptions.
- **Maintain an Accessibility Statement** with feedback channels and remediation timelines.
- **Verify fixes** using automated + manual testing; retain **before/after artifacts**.

- **Track legal exposure** by jurisdiction (risk register) and monitor **EU EAA** supply-chain obligations.
- **Use independent verification** for settlements and procurement (508/AODA).