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# Accessibility Laws by Country

International legal requirements for digital accessibility

**Prepared by:** AccessGuard

**Version:** 1.0

**Date:** October 18, 2025

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

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# Overview

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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

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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 <b>\$75k</b> (first), <b>\$150k</b> (subsequent) under ADA; settlements & fees common
EU	Web Accessibility Directive; <b>European Accessibility Act (2025)</b>	<b>EN 301 549</b> (maps to WCAG 2.1 AA)	National authorities	Administrative penalties; can reach up to <b>2% of turnover</b> (member-state dependent)
UK	Equality Act 2010; Public Sector Regs 2018	WCAG 2.1 AA (gov't guidance)	<b>EHRC</b> ; Central Digital & Data Office for public sector monitoring	<b>Unlimited</b> civil fines; enforcement notices & litigation
Canada	<b>AODA</b> (Ontario); CHRA (federal)	WCAG 2.0/2.1 AA (AODA regs)	AODA enforcement units; CHRC	Up to <b>\$100,000 CAD per day</b> for AODA non-compliance
Australia	<b>DDA 1992</b>	WCAG 2.0 AA (gov't policy)	Australian Human Rights Commission	Enforceable undertakings; fines up to <b>\$100,000 AUD</b> (case dependent)
New Zealand	Human Rights Act; NZ Govt	WCAG 2.1 AA (recommended)	NZ Human Rights	Mediation → orders;

	Web Standards		Commission	penalties vary
Japan	Act on Elimination of Discrimination	<b>JIS X 8341-3:2016</b> (WCAG-aligned)	MHLW & relevant ministries	Administrative guidance; penalties vary
India	<b>RPwD Act 2016</b> ; 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	<b>LBI</b>	WCAG 2.0 AA (public sector)	Federal & state authorities	Administrative fines; amounts vary by case

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## United States

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### 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

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### 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**

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**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).

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## **Canada**

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**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.

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## **Australia**

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**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.

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## New Zealand

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**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.

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## Japan

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**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.

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## India

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**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.

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## Brazil

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**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.

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## Best Practices for Global Compliance

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- **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).