

A guide for e-commerce leaders

Canada's Accessibility Laws

AODA & ACA 2025

Does your business sell to online
customers located in Canada?
Then this guide is for you.

Disclaimer

This guide is provided for informational purposes only and should not be considered legal advice. Please consult with a legal professional before taking any action.

Introduction

Welcome, and thank you for downloading our guide for e-commerce leaders who want to understand how accessibility laws apply in Canada.

I'm Mike Adams OBE, Founder of EnableAll. Our mission is to create an inclusive and accessible online environment by enabling people like me, who live with a disability, to access a website, personalize it to our specific needs, and enjoy a seamless shopping experience.

Accessibility also drives growth by making your store more inclusive.

Accessibility matters, not just because Canadian laws like the Accessibility for Ontarians with Disabilities Act (AODA) and the Accessible Canada Act (ACA) require it, but because it opens your business to millions of potential customers who might otherwise be excluded.

Across Canada, more than six million people live with a disability, representing tens of billions of dollars in spending power.



For e-commerce retailers, navigating these overlapping laws can feel complex. The AODA sets strict rules in Ontario, while the ACA establishes federal standards nationwide. That's why we created this guide: to simplify the essentials, reduce legal risk, and show how accessibility also drives growth by making your store more inclusive.

We hope you find it useful, and we invite you to reach out with any questions or to discuss your digital accessibility strategy further.

Mike Adams OBE
Founder. EnableAll

Contents

01	Why we're here	5
02	Introducing AODA and the ACA	7
03	Why accessibility matters for your business	12
04	What the AODA and ACA mean for you	16
05	What we can learn from enforcement and case examples	20
06	Understanding WCAG and conformance	23
07	How to ensure compliance	29
08	About us: EnableAll's story so far	33

01

Section 01

Why we're here

Does your business sell products or services to Canadian customers? If so, this guide is for you.

Canada has two major accessibility laws that affect e-commerce: the **Accessibility for Ontarians with Disabilities Act (AODA)** and the **Accessible Canada Act (ACA)**.

AODA applies within Ontario, Canada's largest province and home to nearly 40% of the country's population. The ACA, meanwhile, applies nationwide across federally regulated industries and organizations.

| Accessibility is a responsibility
| for all organizations.

If you are a retailer selling online in Canada, you may be subject to one or both laws, depending on your location and business structure. For foreign companies selling into Canada, assume that your website must comply with Canadian accessibility requirements, especially if you accept Canadian dollars and ship to Canadian addresses.

Unlike some international laws that exempt small businesses, AODA and ACA both state that accessibility is a responsibility for all organizations. Penalties for non-compliance are significant, and enforcement is growing through audits, reporting requirements, and naming/shaming strategies.

That's why we created this guide: to cut through the complexity, show you what compliance really means, and help you see accessibility not just as a legal requirement, but as a competitive advantage.



02

Section 02

Introducing AODA and the ACA

Canada has a dual approach to accessibility, with the Accessibility for Ontarians with Disabilities Act (AODA) at the provincial level and the Accessible Canada Act (ACA) at the federal level. Although they differ in scope and enforcement, both laws aim to ensure that people with disabilities have equal access to goods, services, and digital spaces, including e-commerce websites.

Here's what you need to know about each one:

AODA: Accessibility for Ontarians with Disabilities Act

Introduced in 2005, the AODA was among the first comprehensive accessibility laws worldwide. It applies to both public and private organizations in Ontario and mandates adherence to accessibility standards in various areas, including Information and Communications (where websites and apps are included).

Under the AODA's Integrated Accessibility Standards Regulation (IASR), private-sector organizations in Ontario with 50 or more employees are required to ensure that their public-facing websites and web content conform to WCAG (the Web Content Accessibility Guidelines) 2.0 Level AA.

There are only a few limited exceptions. For example, live captioning of live video and audio descriptions for pre-recorded video are not currently mandatory under Ontario rules (though they are encouraged as best practice and may become required in future).

This standard covers a wide range of accessibility features, including:

- **Providing alt text for images** so screen readers can describe visual content.
- **Ensuring sufficient color contrast** so that text and interactive elements are legible.
- **Making all functionality available via keyboard navigation** (not just mouse).
- **Using clear form labels and error messages** to make checkout and login processes accessible.
- **Structuring pages with proper headings and landmarks** to make them easier to navigate with assistive technology.

ACA: Accessible Canada Act

Passed in 2019, the ACA is a federal law that applies to federally regulated entities, such as banks, telecommunications companies, airlines, and federal agencies. However, its influence also extends to vendors and partners who do business with these entities.

- **The ACA aligns more closely with modern standards**, referencing WCAG 2.1 Level AA.

- **It introduces a phased compliance model** with long-term goals of achieving a barrier-free Canada by 2040.

- **Enforcement is handled by the Accessibility Commissioner**, who can conduct inspections, order corrective action, and impose fines of up to CA\$250,000 per violation.

- **For e-commerce businesses**, the ACA's influence is felt through vendor contracts, partnerships with federally regulated industries, and growing consumer expectations. Even if your store is not directly regulated, aligning with WCAG 2.1 AA is the best way to stay competitive and future-proof your business.

Why these laws matter together

For many retailers, the AODA will apply if you're operating in or selling to Ontario, while the ACA will become increasingly relevant as Canada harmonizes standards nationally. Both laws point back to WCAG, making it the practical roadmap for compliance.

Key takeaway

Whether through AODA, ACA, or both, Canadian accessibility law requires you to make your e-commerce site accessible. Ignoring it risks not only fines but also exclusion from millions of potential customers.

AODA vs ACA at a glance

Feature	AODA (Ontario)	ACA (Federal)
Year introduced	2005	2019
Scope	Applies to public- and private-sector organizations in Ontario	Applies to federally regulated industries (banks, airlines, telecoms, government agencies), plus vendors/partners
Threshold	Private-sector organizations with 50+ employees must comply with website rules	Applies broadly to all federally regulated organizations (no employee threshold)
WCAG standard	WCAG 2.0 Level AA (with limited exceptions for live captions and audio description)	WCAG 2.1 Level AA, reflecting mobile, low vision, and cognitive accessibility
Compliance model	Mandatory compliance reports and audits	Phased rollout, goal of barrier-free Canada by 2040
Enforcement	Ontario government conducts audits; non-compliance can be “named and shamed”	Oversight by the Accessibility Commissioner, with inspections and corrective orders
Fines	Up to CA\$100,000 per day for corporations; up to CA\$50,000/day for individuals	Up to CA\$250,000 per violation
Impact on e-commerce	Directly requires larger retailers in Ontario to meet WCAG 2.0 AA	Influences e-commerce indirectly via vendor contracts with federally regulated entities; sets WCAG 2.1 AA as the benchmark

For e-commerce retailers, the safest strategy is to meet WCAG 2.1 AA — it satisfies both laws and future-proofs your store.

Do Canadian accessibility laws apply to my website?

✓ Yes, if you sell to Canadian customers online.

- ✓ AODA applies if your organization has 50+ employees and operates in Ontario. Your public-facing website and content must meet the WCAG 2.0 AA standards.
 - ✓ ACA applies if you are a federally regulated organization (such as a bank, airline, or telecom) or if you are a vendor or partner working within these sectors. Even if you are not directly regulated, you can still expect accessibility requirements to apply through your contracts.
-

There are no safe exemptions for e-commerce retailers targeting Canadian customers. Consumer expectations, government audits, and supply chain requirements make accessibility a vital consideration.

🎯 The bottom line

If you accept Canadian dollars, ship to Canadian addresses, or target Canadian consumers, you should assume AODA and ACA standards apply to you.

03

Section 03

Why accessibility matters for your business

Accessibility isn't just a legal requirement in Canada; it's also a major growth opportunity. By making your online store inclusive, you're reaching millions of potential customers and strengthening a more resilient, future-ready brand.

The market you can't ignore

6.2m Canadians with a disability



22% of the population

More than 6.2 million Canadians (about 22% of the population) live with a disability.

Tens of billions

Collectively, Canadians with disabilities represent tens of billions of dollars in disposable income. When you include their households, families, and caregivers, the spending power linked to accessibility grows exponentially.

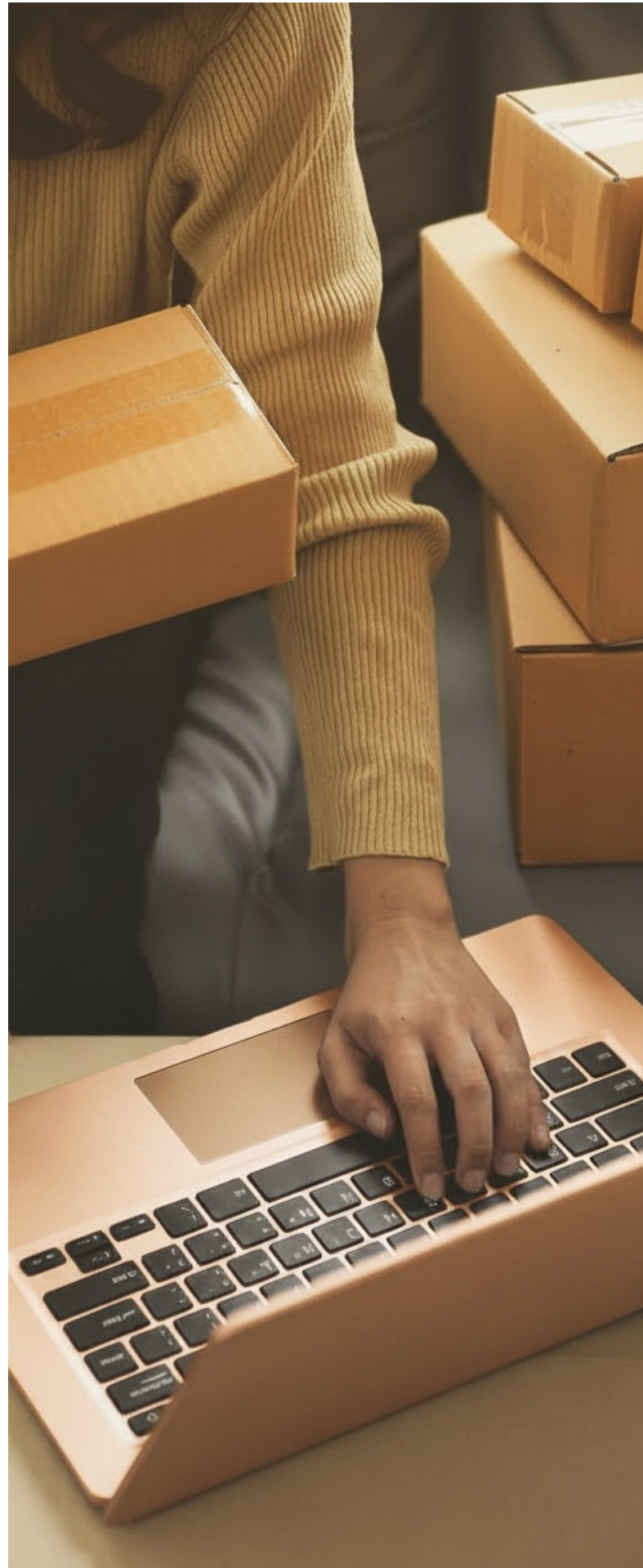
62% of Canadian consumers



62% prefer accessible and inclusive businesses

A 2021 survey found that 62% of Canadian consumers prefer to support businesses they perceive as accessible and inclusive.

For e-commerce retailers, that means accessibility isn't just compliance, it's a direct driver of sales.





Reputation and loyalty

In an increasingly values-driven marketplace, Canadian shoppers care about inclusivity:

- Customers are more likely to trust and return to brands that demonstrate a commitment to accessibility.
- Accessibility investments improve your ESG (Environmental, Social, Governance) profile, which is crucial to institutional investors and larger B2B contracts.
- Companies that neglect accessibility face public criticism, especially as both AODA and ACA enforcement agencies publish the names of organizations found non-compliant.



Legal and financial risk

- AODA penalties can reach CA\$100,000 per day for corporations, with the Ontario government actively conducting audits and 'naming and shaming' non-compliant businesses.
- ACA fines can be as high as CA\$250,000 per violation, enforced by the Accessibility Commissioner.
- Beyond fines, lawsuits or complaints can lead to expensive remediation projects and lasting damage to reputation.



A competitive edge

Many Canadian businesses are still behind on accessibility. By acting now, you can:

- Differentiate your brand from competitors.
- Future-proof your operations against evolving ACA standards (aimed at a barrier-free Canada by 2040).
- Expand into the U.S. and EU markets more seamlessly, since WCAG is the global standard referenced by laws worldwide.

🎯 The bottom line

Accessibility in Canada is both a compliance requirement and a business advantage. Inclusive e-commerce stores not only avoid fines but also unlock loyalty from millions of customers eager to shop with brands that meet their needs.

This isn't just about ticking a legal box. Getting accessibility right helps you reach more people, grow your brand, and do the right thing.

Three ways accessibility will improve your business

Expand your market

Making your digital products accessible means reaching new and larger audiences, including individuals who depend on assistive technologies such as screen readers, keyboard navigation, or voice commands. Yet, it's not just individuals with disabilities who will benefit. Features such as responsive layouts, video captions, and high-contrast text also improve the user experience for everyone.

Enhance your brand reputation

Consumers are increasingly drawn to socially responsible retailers, so enhancing accessibility can significantly boost your brand reputation by demonstrating stronger ESG values. It makes excellent business sense, wouldn't you agree?

Boost sales

An accessible website will benefit your bottom line with:

- **More customers:**
Many accessibility practices, such as providing descriptive alt text, align closely with Search Engine Optimization (SEO) best practices, helping your website to rank higher in search results and increase traffic.
- **Reduced bounce rates:**
An accessible website allows users to navigate and interact with your content effortlessly. That results in increased user engagement and lower bounce rates.
- **Increased conversions:**
When users can easily navigate your site, they are more likely to complete calls to action, such as adding products to a basket or subscribing to a newsletter.

04

Section 04

What the AODA and ACA mean for you

For e-commerce retailers, Canada's accessibility laws are not just another legal hurdle; they influence how your website needs to function for millions of customers. The AODA (provincial) and the ACA (federal) create overlapping responsibilities that together establish the standard for digital accessibility in Canada.

AODA: What it means in practice

Who must comply

Private businesses in Ontario with 50 or more employees must ensure their websites and web content conform to WCAG 2.0 Level AA. Smaller businesses still have some obligations (like accessible customer service), but larger retailers face stricter digital rules.

Compliance reporting

Businesses must file regular accessibility compliance reports. Ontario conducts audits and may 'name and shame' non-compliant companies.

Penalties

Fines can reach up to CA\$100,000 per day for corporations and CA\$50,000 per day for individuals.

E-commerce impact

If you're selling online in Ontario and meet the employee threshold, your website must be accessible. Even smaller businesses risk reputational harm if customers file complaints.

ACA: What it means in practice

Who must comply

Federally regulated industries (e.g., banks, airlines, telecoms, government agencies) and their vendors and partners. If you partner with these sectors, expect accessibility requirements to be included in your contracts.

WCAG standard

ACA mandates WCAG 2.1 Level AA, which is more current than AODA's WCAG 2.0. This raises the standards for mobile accessibility, meeting the needs of people with low vision and cognitive impairments.

Compliance model

The ACA implements a phased rollout, aiming for a barrier-free Canada by 2040. Retailers must publish accessibility plans, progress reports, and feedback mechanisms.

Enforcement

The Accessibility Commissioner can inspect, order corrective actions, and issue fines of up to CA\$250,000 per violation.

E-commerce impact

Even if you're not federally regulated, aligning with WCAG 2.1 AA is the safest path. It positions you to serve federally regulated clients and ensures your store is future-proof.

Why it matters together

- **Dual compliance:** Ontario retailers may face both AODA and ACA obligations.
- **Rising expectations:** As ACA standards roll out nationally, WCAG 2.1 AA will likely become the de facto benchmark across Canada.
- **Risk vs reward:** The cost of non-compliance includes heavy fines, audits, reputational damage, and lost sales. But compliance brings new customers, stronger ESG credentials, and smoother entry into international markets.

🔑 Key takeaway

Whether through AODA, ACA, or both, Canadian accessibility law requires you to make your e-commerce site accessible. Ignoring it risks not only fines but also exclusion from millions of potential customers.



05

Section 05

What we can learn from enforcement and case examples

Canada's accessibility enforcement is less lawsuit-driven (so far) than in the U.S., but there are important cases and evolving trends that e-commerce retailers should watch closely. These illustrate both the legal principle and the momentum behind digital accountability.

Landmark Case: Donna Jodhan vs. Canada (2010)

In 2010, Donna Jodhan, a blind advocate, challenged the Canadian Federal Government because key government websites were not accessible to users of screen readers. The Federal Court agreed, ordering the government to make its websites accessible.

Ultimately, the decision reinforced that digital accessibility is part of the government's equality obligations. This ruling helped lay the foundation for the ACA by establishing that inaccessible web services can violate constitutional and human rights obligations.

Lesson for retailers

Although this case involved government entities, its reasoning has been incorporated into the ACA framework, illustrating that digital accessibility is essential.



Trends and enforcement activity



Rising lawsuits and audits:

While Canada has not yet seen a flood of private web accessibility lawsuits, advocacy groups and legal commentators suggest that the number of complaints and demands is increasing.



Regulatory evolution:

The federal government is consulting on proposed amendments to the ACA that would impose stricter web accessibility obligations on private businesses serving federally regulated sectors.



Provincial reviews and criticism:

Ontario continues to scrutinize AODA's effectiveness. During the 2023 legislative review, stakeholders raised concerns about slow progress, weak enforcement, and the lack of adequate legal measures in many areas.

Potential Canada lawsuit growth

While Canada has fewer high-profile digital lawsuits than the U.S., two dynamics are shifting:

- **The Donna Jodhan ruling** remains a cornerstone of constitutional law.
- **Proposed amendments to ACA regulations** could result in stricter enforcement and increased risks for vendors and e-commerce platforms.
- **Businesses should anticipate demand letters, audits, and compliance orders** well before full-blown lawsuits.

Key takeaways for e-commerce retailers in Canada

- **The Donna Jodhan case demonstrates** that Canadian courts recognize that inaccessible web services can infringe upon equality rights.
- **The enforcement environment is evolving** with greater audits, formal complaints, and potential federal oversight on the horizon.
- **The best protection is proactive compliance:** treating web accessibility as a foundational, not optional, principle.

06

Section 06

Understanding WCAG and conformance

When it comes to web accessibility, you'll often see one acronym: WCAG (the Web Content Accessibility Guidelines). These are the international technical standards that define what 'accessible' means for websites, apps, and digital services.

In Canada, WCAG goes beyond guidance: it's embedded into law. The AODA mandates WCAG 2.0 AA, while the ACA refers to WCAG 2.1 AA. This means that if you want your online store to be legally compliant in Ontario and nationwide, you should aim for the highest WCAG standards.

So, what is WCAG?

The **Web Content Accessibility Guidelines (WCAG)** are globally recognized technical standards designed to ensure that your websites, apps, and digital content are accessible to everyone, including people with disabilities such as auditory, cognitive, neurological, physical, speech, and visual impairments.

They are created by the **World Wide Web Consortium (W3C)** and are regularly updated as digital accessibility advances with new technology and more sophisticated design practices.

WCAG helps web developers, designers, and copywriters identify and remove barriers that any digital user might encounter online. Importantly, they also assist organizations in complying with worldwide legal requirements such as the AODA and ACA.





The WCAG POUR Principles

The WCAG are organized into four guiding principles to help you design websites, apps and digital content that everyone can use. They're a simple way to check you're putting accessibility at the heart of digital design.

Perceivable

Information should be presented in ways that all users can access, such as providing alternative text for images.

Operable

Interfaces should be easy to navigate when using a variety of devices and assistive technologies.

Understandable

Content should be clear and predictable.

Robust

Websites and digital tools should work with a wide range of assistive technologies.

Three levels of conformance

Besides the various versions of the WCAG, there are also three levels of conformance to consider, namely A, AA, and AAA.

A

The minimum level of conformance.

Requirements include:

- Keyboard-only content access.
- Clearly labeled form fields with instructions so users know what information is required.
- Content compatibility with assistive technologies.

AA

The mid-range conformance level that represents strong accessibility.

Requirements include:

- The text and background must have the correct color contrast (a minimum of 4.5:1).
- Content organization must have a clear heading structure and follow a logical order (e.g., H1, H2, H3).
- Navigation elements must be consistent throughout every webpage.

AAA

The highest level of conformance

Requirements include:

- A minimum contrast ratio of 7:1 for text and backgrounds.
- Sign language translation for pre-recorded video content.
- Enhanced audio descriptions for pre-recorded video content.

How WCAG has been updated

The various versions of WCAG are backwards compatible, meaning the more recent version incorporates the success criteria from the earlier version, with additions. Therefore, if content conforms with WCAG 2.2, it also conforms with WCAG 2.1, and so on.

- **WCAG 2.0 (2008):** Explicitly required by the AODA in Ontario.
- **WCAG 2.1 (2018):** Required by the ACA, adding stronger coverage for mobile, low vision, and cognitive accessibility.
- **WCAG 2.2 (2023):** It adds further requirements but has not yet been incorporated into Canadian enforcement frameworks.
- **WCAG 3.0 (draft):** In development, expected around 2027. Businesses should plan for it in the long term but focus on WCAG 2.0/2.1 AA today.

Why it matters for Canadian e-commerce

For retailers, WCAG translates into practical actions:



Alt text for images: This allows product photos to be understood by screen readers.



Color contrast: Prices, buttons, and banners must be visible and legible.



Keyboard navigation: Shoppers must be able to navigate menus, filters, and checkout without a mouse.



Accessible forms: Checkout and account sign-up forms require clear labels and effective error handling.



Mobile accessibility: ACA's WCAG 2.1 requirement ensures shopping experiences function across all devices.

Next step: Download EnableAll's WCAG checklist

Understanding WCAG is one thing, but implementing it is another. That's where our WCAG Checklist comes in.

- ✓ Translates 77 WCAG requirements into plain English.
- ✓ Shows what to do, who should do it (designers, developers, copywriters), and why it matters.
- ✓ Helps you review your Shopify store or website in a step-by-step manner.
- ✓ Highlights which accessibility issues EnableAll can fix automatically, and where your team can make the most significant impact.

[Download the EnableAll WCAG Checklist](#) and give your team a clear roadmap to compliance and accessible growth



Key takeaway

Meeting WCAG 2.1 AA will satisfy ACA requirements, exceed AODA's WCAG 2.0 AA baseline, and future-proof your store as standards evolve.





Section 07

How to ensure compliance

Complying with Canadian accessibility laws may seem complicated, especially with both provincial and federal rules involved. However, it doesn't need to be overwhelming. By following a clear framework, you can gradually align your store with AODA and ACA requirements while fostering a more inclusive experience for all customers.

Seven steps for complying with the AODA & ACA

Step 01

Assess your current site

Start with a quick scan using free tools like Google Lighthouse or WAVE. These highlight common issues such as missing alt text, poor color contrast, or broken heading structures. They won't catch everything, but they provide a baseline.

Step 02

Use the WCAG checklist

The EnableAll WCAG Checklist breaks down the technical requirements of WCAG 2.0/2.1 into plain English. Share it with your developers, designers, and content creators so accessibility becomes everyone's responsibility.

Step 03

Prioritize quick wins

- Add descriptive alt text to all product images.
- Improve color contrast on buttons, banners, and pricing text.
- Make sure every form (especially checkout) has clear labels and error messages.
- Ensure all menus and pop-ups can be navigated with a keyboard.

These improvements are low-cost yet high-impact, benefiting both compliance and customer experience.

Step 04

Build accessibility into everyday work

Accessibility shouldn't be a one-off project. Train your team:

- Copywriters: Use plain language and descriptive link text.
- Designers: Stick to consistent layouts and accessible color palettes.
- Developers: Test with screen readers and assistive technology on both mobile and desktop devices.

Step 05

Go beyond compliance

Meeting AODA's WCAG 2.0 AA baseline is a good start, but WCAG 2.1 AA (ACA standard) is a smarter target.

Companies that aim higher tend to see better conversion rates, greater customer loyalty, and enhanced ESG performance.

Step 06

Automate what you can

EnableAll's technology automatically resolves repetitive WCAG issues - from alt text to color contrast - while providing customers with a toolbar to personalize their experience. This allows your team to concentrate on higher-level improvements.

Step 07

Test with real users

No checklist or tool can replace real feedback. Work with people who use screen readers, voice navigation, or alternative input devices. Even a short round of user testing will reveal issues you may have missed.

In short



Scan your site for accessibility issues.



Use our WCAG checklist as your roadmap.



Fix quick wins first, then aim for WCAG 2.1 AA.



Make accessibility part of everyone's role.



Use EnableAll to automate fixes and stay ahead of legal changes.



Test with real users to validate improvements.

Accessibility isn't a one-off project; it's an ongoing commitment. But it pays off with more customers, lower legal risk, and a stronger, more inclusive brand.

Overlay myth

Many businesses turn to accessibility ‘overlays’ - tools that claim to instantly make a website accessible or compliant with laws such as the AODA or ACA. But overlays are often criticized by advocacy groups and experts, because they mask problems instead of fixing them at the source.

Canadian regulators and human rights commissions are unlikely to accept overlays as a defense for non-compliance. If a customer files a complaint, you’ll still be required to remediate your site at the code and content level.

🎯 The bottom line

Overlays are not a compliance strategy.

Focus on genuine accessibility improvements and fixing barriers at the code and content level.

4,605 lawsuits



In the U.S, a quarter of the 4,605 ADA web-accessibility lawsuits filed in 2023 explicitly named websites running overlay widgets.

700+ expert signatures

700+ accessibility experts have signed the Overlay Fact Sheet, stating that “no overlay can make a website fully compliant or eliminate legal exposure.”

overlayfactsheet.com).



Section 08

About us: EnableAll's story so far

At EnableAll, our mission is simple: to open the web to everyone and make accessibility effortless for retailers.

Founded by Mike Adams OBE, EnableAll was built on lived experience. As someone who has navigated life with a disability, Mike saw firsthand how frustrating it can be when websites create barriers that prevent people from shopping, learning, or working online. EnableAll was created to remove those barriers, not just to comply with laws like the AODA and ACA, but to make the digital world truly inclusive.

Our promise to retailers

- We'll help you **reduce legal risk** by aligning your site with AODA, ACA and WCAG standards.
- We'll help you **welcome more customers**, including the 61 million Americans living with a disability.
- We'll help you **build a trusted, inclusive brand that grows sustainably**.

EnableAll isn't just about compliance. It's about helping your business thrive by making the web work for everyone.

Learn more at www.enableall.com
or email us at hello@enableall.com.

Why we're different

- **Accessibility first:** While others promise 'quick fixes', we focus on addressing accessibility at its source. That means your store becomes compliant and stays compliant.
- **Made for e-commerce:** We designed EnableAll with Shopify and other major platforms in mind. From product images to checkout flows, our technology knows where online stores need the most help.
- **Future-proof compliance:** Laws evolve, and so do we. EnableAll adapts with WCAG updates and new legal requirements, so you're always ahead of the curve.
- **Inclusive by design:** Our customer-facing toolbar empowers every shopper to personalize their experience, from adjusting contrast to enabling text-to-speech.

**Reduce risk.
Win customers.
Improve SEO.**

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Open your website to everyone and turn compliance into growth.