

CHECKLIST · TOMORIS TOOLBOX

Accessibility: Checklist for Websites and Shops Under the BaFG and WCAG 2.2

Scope and exemptions of the BaFG (Austrian Accessibility Act), obligations of service providers, the standards EN 301 549 and WCAG 2.2, checkpoints to tick off, and how to proceed

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ONLINE

tomoris.com/en/downloads/barrierefreiheit-website-checkliste

AT A GLANCE

Jun 28, 2025

BaFG in force (§ 37 para. 1)

< 10

Employees:
micro-enterprises
exempt for services

€80,000

Maximum penalty for an
inaccessible service

WCAG 2.2

Basis of EN 301 549
V4.1.1 (2026)

WHO IT IS FOR

- Online retailers and providers of booking or ordering flows for consumers
- Banks, insurance intermediaries, and other service providers with a website or app
- Web agencies and development teams that build websites and apps
- Executives who want to assess whether and how the BaFG affects them

WHAT THIS COVERS

Since June 28, 2025, the Barrierefreiheitsgesetz (BaFG, Austrian Accessibility Act) has applied in Austria. Among other things, it requires online shops, booking flows, banking services, and apps for consumers to be perceivable, operable, understandable, and robust, and it requires providers to describe how their service meets these requirements. This checklist explains who is covered and who is exempt, which obligations and penalties the law sets out, and how EN 301 549 and WCAG 2.2 relate to each other. It also lists the most important WCAG checkpoints to tick off.

This checklist is a TOMORIS recommendation and provides an overview. It does not replace legal advice or a full accessibility audit; the legal text in its current version and the standards cited are authoritative.

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01 —

Who Is Covered by the BaFG

Services for consumers since June 28, 2025, the exemption for micro-enterprises, and which content is excluded.

The BaFG (BGBl. I No. 76/2023) transposes Directive (EU) 2019/882 and entered into force on June 28, 2025 (§ 37 para. 1). It applies to certain products placed on the market after that date and to certain services provided to consumers after that date (§ 2). For most websites, § 2 para. 2 no. 6 is decisive: e-commerce services, meaning services provided at a distance, by electronic means, and at the individual request of a consumer with a view to concluding a consumer contract via websites and mobile services (§ 3 no. 27).

Public bodies such as the federal government, the federal states, and municipalities are subject to the Web-Zugänglichkeits-Gesetz (Austrian Web Accessibility Act) and state laws for their websites, not to this checklist.

Services under § 2 para. 2 BaFG, in each case for consumers

SERVICE	REFERENCE
E-commerce services, such as online shops and booking flows	§ 2 para. 2 no. 6
Banking services	§ 2 para. 2 no. 4
Electronic communications services, excluding emergency calls and machine-to-machine services	§ 2 para. 2 no. 1
Services providing access to audiovisual media services	§ 2 para. 2 no. 2
Air, bus, rail, and waterborne passenger transport: websites, apps, e-tickets, travel information	§ 2 para. 2 no. 3
E-books and dedicated software	§ 2 para. 2 no. 5

Micro-enterprise A company with fewer than ten employees and an annual turnover or annual balance sheet total of no more than €2 million (§ 3 no. 19). Those providing services are exempt from the requirements and all related obligations (§ 6 para. 1); this exemption does not apply to products.

Excluded content Pre-recorded time-based media and office file formats published before June 28, 2025; online maps, if essential information for navigation is provided in an accessible way; third-party content that is neither funded nor controlled; archives that are no longer updated after June 28, 2025 (§ 2 para. 3).

Transition Products lawfully used before June 28, 2025, may continue to be used for similar services until June 28, 2030; service contracts concluded before that date remain unchanged until they expire, but for no more than five years from that date (§ 37 para. 2).

02

What the BaFG Requires of Service Providers

Requirements under Annex 1, information under Annex 3, ongoing compliance, corrective action, and documentation.

- ☐ Website and app designed to be perceivable, operable, understandable, and robust (§ 4 para. 3, Annex 1)
- ☐ In the shop: accessibility information on the products offered is provided, where the manufacturer supplies it (Annex 1)
- ☐ Identification, security, and payment functions are accessible when they are part of the service (Annex 1)
- ☐ The general terms and conditions or a similar document describe how the service meets the requirements: general description, necessary explanations, fulfillment of the requirements (§ 14 para. 2, Annex 3)

- ☐ This information is made available to the public in written and oral form, including in an accessible format, and kept for as long as the service is offered (§ 14 para. 2)
- ☐ A procedure is in place to keep meeting the requirements whenever the service, the requirements, or the standards change (§ 14 para. 3)
- ☐ In case of deficiencies, corrective measures are taken and, if the service does not comply, the Sozialministeriumservice (Austrian federal social affairs agency) is informed without delay (§ 14 para. 4)
- ☐ Reliance on a fundamental alteration or disproportionate burden only with a documented assessment, kept for five years and, for services, renewed upon changes and at least every five years (§§ 17, 18)

Anyone who has received public or private funds to improve accessibility cannot claim a disproportionate burden (§ 18 para. 7).

03

Which Standard Applies: EN 301 549 and WCAG

Presumption of conformity under § 5 BaFG and the status of the European standard in October 2026.

Anyone who meets harmonized standards whose references have been published in the Official Journal of the EU is presumed to conform with the requirements, to the extent the standards cover them (§ 5 para. 1 BaFG). The relevant European standard for digital accessibility is EN 301 549. ETSI published version V4.1.1 in September 2026; it adopts WCAG 2.2 and, for the first time, maps its requirements to Directive (EU) 2019/882 in a dedicated annex. According to AccessibleEU, the European Commission's resource center, version V3.2.1 from 2021, based on WCAG 2.1 Level AA, remains the relevant reference until publication in the Official Journal.

TOMORIS recommendation: test and develop against WCAG 2.2 Level AA now. According to the W3C, WCAG 2.2 builds on 2.1 and is backward compatible; pages that meet 2.2 should also meet 2.1. If you are explicitly required to test against 2.1, keep testing criterion 4.1.1 Parsing, which was removed in 2.2.

04

Core WCAG 2.2 Checkpoints to Tick Off

The success criteria that websites and shops most often fail in practice, Levels A and AA.

- ☐ 1.1.1 Non-text Content: images, icons, and image buttons have an equivalent text alternative
- ☐ 1.2.2 Captions: pre-recorded videos with audio have captions
- ☐ 1.4.3 Contrast: text has a contrast ratio of at least 4.5:1, large text 3:1

☐	1.4.4 Resize Text: text can be enlarged to 200% without assistive technology and without loss of content or functionality
☐	1.4.10 Reflow: content works at a width of 320 CSS pixels without horizontal scrolling
☐	2.1.1 Keyboard: all functions can be operated with the keyboard, including menus, filters, and checkout
☐	2.4.7 Focus Visible: the keyboard focus is always visible
☐	2.4.11 Focus Not Obscured (new in 2.2): the focused element is not fully hidden, for example by cookie banners or sticky bars
☐	2.5.7 Dragging Movements (new): anything that works by dragging also works with a single click or tap
☐	2.5.8 Target Size (new): click targets are at least 24 by 24 CSS pixels, with defined exceptions
☐	3.1.1 Language: the main language of the page is specified in the code
☐	3.3.1 and 3.3.2 Forms: fields are labeled, errors are identified and described in text
☐	3.3.7 Redundant Entry (new): data already entered is pre-filled or offered for selection within the same process
☐	3.3.8 Accessible Authentication (new): no cognitive function test such as puzzles or retyping, unless another sign-in method or a help mechanism is available
☐	4.1.2 Name, Role, Value: controls are correctly named and marked up for assistive technologies

This list is a selection by TOMORIS and does not replace a full review of all Level A and AA success criteria. The wording of the W3C Recommendation WCAG 2.2 of December 12, 2024, is authoritative.

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Supervision, Complaints, and Penalties

The Sozialministeriumservice monitors the market; consumers and associations can report issues.

Supervision and administrative penalties under the BaFG

TOPIC	RULE	REFERENCE
Market surveillance	The Sozialministeriumservice monitors services offered online and offline and checks whether requirements and obligations are met	§ 22 para. 2 and 3

Reports	Consumers, the VKI (Austrian consumer association), the Austrian Disability Council, the Federal Chamber of Labour, and the Austrian Economic Chamber can report violations; a response is due within eight weeks	§ 35
Administrative penalties	Up to €80,000 for an inaccessible service, up to €40,000 for missing information under Annex 3 or missing corrective measures; for micro, small, and medium-sized enterprises up to €50,000 or €25,000 respectively	§ 36 para. 1 no. 3, para. 2 no. 2 and 7

06

How to Proceed

From clarifying whether you are affected to lasting compliance; a TOMORIS recommendation.

1

Clarify whether you are affected

Is the offering aimed at consumers, does it fall under § 2 para. 2, and are you a micro-enterprise under § 3 no. 19? Record the result and the reasoning in writing.

2

Take inventory

List the pages and flows that consumers use: product list and product page, shopping cart, sign-in, checkout, payment, forms, downloads.

3

Test

Automated testing tools find only some of the errors; for each page type, add keyboard, zoom, screen reader, and contrast testing.

4

Fix deficiencies

Start with templates and components, then the content; demand fixes from third-party providers of payment and sign-in functions or replace them.

5

Inform and stay compliant

Publish the information under Annex 3 in the general terms and conditions or a similar document, keep test reports and assessments under §§ 17 and 18, and include accessibility in the acceptance of new features and content (§ 14 para. 3).

NEXT STEP

Check It Yourself or Put It into Practice Together

DISCUSS IMPLEMENTATION

Get in Touch

tomoris.com/en/contact

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07 —

Sources

All statements are supported by sources. Legislation applies in its current version.

- 1 **Barrierefreiheitsgesetz (BaFG, Austrian Accessibility Act), BGBl. I No. 76/2023, current version in the RIS**
§§ 2 to 6, 14, 17, 18, 22, 35 to 37, Annexes 1 and 3, version as of October 25, 2026
www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=1051630
- 2 **Directive (EU) 2019/882 on the accessibility requirements for products and services**
Art. 4(5), Art. 31
eur-lex.europa.eu/eli/dir/2019/882/oj/deu
- 3 **W3C: Web Content Accessibility Guidelines (WCAG) 2.2, W3C Recommendation December 12, 2024**
Success criteria as in Section 04, new criteria, and the removed 4.1.1
www.w3.org/TR/WCAG22
- 4 **ETSI EN 301 549 V4.1.1, publication directory**
Versions up to 04.01.01_60
www.etsi.org/deliver/etsi_en/301500_301599/301549
- 5 **AccessibleEU: The European accessibility standard EN 301 549 has been updated (September 7, 2026)**
Status of citation in the Official Journal, WCAG 2.2, annex on Directive (EU) 2019/882
accessible-eu-centre.ec.europa.eu/content-corner/news/european-...