

Ecommerce Accessibility: 2025 Readiness Snapshot

Can Everyone Complete Checkout?



27%



CONTENTSQUARE
Foundation

What's Inside

Introduction: Understanding the urgency	3
Objective of this report	4
The European Accessibility Act (EAA) and ecommerce	5
Behind the snapshot: Our methodology	6
Ecommerce accessibility: 2025 readiness snapshot	7
1. Accessibility readiness for ecommerce checkout is alarmingly low	8
2. No European market is ready	9
3. Consumers face barriers across the entire shopping journey	10
4. Core accessibility criteria are breaking the checkout experience	11
I. Checkout is invisible to assistive technologies	12
II. Forms block users from completing purchases	14
III. Low contrast makes checkout hard to see	15
IV. Users relying on keyboards get stuck, lost, or skipped ahead	16
5. Consumers face the same barriers, everywhere	17
Design spotlight by Razorfish: When accessibility meets creativity	19
Conclusion: Digital exclusion puts both users and businesses at risk	22
Appendix	24

Introduction:

Understanding the urgency



94%

of Europe's top ecommerce sites have inaccessible checkout flows.*

*This represents sites that scored 7.5/10 or below on accessibility criteria audited.

Can everyone complete a checkout?

Ecommerce has become central to daily life in Europe. In today's increasing digital world, **77% of EU internet users shop online** — a number that has jumped significantly from 59% just a decade ago ([Eurostat, 2024](#)). Online retail is no longer a niche channel but the backbone of consumer life in Europe. Yet despite this rapid growth, **most online shopping experiences remain inaccessible to millions of people.**

Over **27% of EU adults – more than 100 million people – live with a disability** ([EU, 2023](#)). While most of these individuals use the internet regularly (87%), usage drops to 78% among those with severe limitations, highlighting persistent access gaps ([Eurostat, 2024](#)). Globally, demand for assistive technologies is also surging: more than **2.5 billion people** already need them today, with that number expected to rise significantly in the coming years ([AbilityNet, 2022](#)).

These figures underscore a simple truth: **if ecommerce is to be truly universal, it must be accessible.** This urgency has only intensified with the **European Accessibility Act (EAA)**, which came into effect in June 2025. The law requires that online shopping and payment processes be usable by everyone, including people with disabilities, notably those relying on assistive technologies such as screen readers, keyboard navigation, or voice input for more details on the EAA, refer to page 5.

To assess how prepared the sector really is, the Contentsquare Foundation audited **50 of the most visited ecommerce websites** in France, Germany, Italy, Spain, the UK, alongside major global marketplaces. We focused on the **end-to-end checkout journey** — from product listings to payment confirmation — and evaluated each page against **15 WCAG 2.2 accessibility criteria.**

However, our findings reveal that accessibility readiness in the ecommerce sector **remains alarmingly low.**

Objective of this report



If users can't complete a purchase, companies can't make the sale. Behind digital accessibility lies not only a human imperative of inclusion, but also one of economic performance. Digital exclusion isn't a marginal bug: it is a major barrier to growth and confidence.



Marion Ranvier | Executive Director
Contentsquare Foundation

1

Measure the real state of accessibility in ecommerce.

To provide a data-driven view of how Europe's most visited ecommerce sites perform across the full shopping journey, from product discovery to payment, and assess readiness for the EAA.

2

Identify the most common barriers for users with disabilities. To uncover recurring technical and design issues that make online shopping journeys inaccessible, where and why they occur, and turn these findings into actionable insights.

3

Drive awareness and accountability across the digital ecosystem. To help ecommerce leaders, designers, and developers understand that accessibility is not just a legal requirement, but a business, ethical, and design imperative.

The European Accessibility Act (EAA) and Ecommerce

The European Accessibility Act (EAA) is an EU directive adopted in 2019 that came into force in June 2025. Its goal is simple: to ensure that **key products and services in Europe are accessible to everyone**, including the 1 in 4 people living with disabilities.

The EAA harmonizes accessibility requirements across all EU Member States, setting common rules to guarantee that people with disabilities can fully participate in society. It applies to a wide range of sectors — from banking and transport to e-books and ecommerce — each with specific requirements.

What it means for ecommerce

For ecommerce, the requirements are clear:

- **Shopping journeys** – from browsing product listings to adding items to a cart – must be barrier-free.
- **Checkout and payment systems** must be operable by everyone, including those using assistive technologies such as screen readers, keyboard navigation, or voice input.
- **Errors, instructions, and visual cues** must be presented in ways all users can understand.

In practice, this means online stores and apps must ensure that customers can:

1. Browse and select products
2. Add items to their carts
3. Complete checkout and payment

... all **without** facing digital barriers.

In other words, **accessibility must be integrated into the entire customer shopping journey**, from product discovery to order confirmation.

Why it matters to businesses

Compliance is not just a legal obligation – it is a human, commercial and reputational imperative.

The risks are threefold:

- **Financial:** Users who cannot complete a purchase abandon it. Inaccessible checkout flows directly translate into abandoned carts, excluded customers, and lost revenue.
- **Legal:** Non-compliance with the EAA carries penalties, and exposes companies to sanctions, lawsuits, and market exclusion.
- **Reputational:** Excluding millions of potential customers undermines trust and damages brand value in a market where inclusion is increasingly expected.

In short: from 2025, accessibility in online shopping is no longer 'optional' or 'nice to have' – it's essential.

Behind the snapshot

Our Ecommerce Accessibility: 2025 readiness snapshot assesses how prepared the sector is for the **European Accessibility Act (EAA)**, focusing on the accessibility of checkout flows across the most visited ecommerce sites in Europe.

Our methodology



Website Selection: We audited **50 of the most visited ecommerce websites** across 5 European markets (France, Germany, Italy, Spain, the United Kingdom), alongside major global marketplaces. Rather than limiting the sample to domestic brands headquartered in each country, we focused on the websites that consumers actually use most, ensuring findings reflect the real digital experience of consumers in each market. For the full list of websites audited, refer to the Appendix page 27.



Pages Audited: A total of **250 pages** were analyzed across the key stages of the ecommerce journey: Product Listing Pages (**PLP**) – where users browse product grids, filters, and search. Product Detail Pages (**PDP**) – where users view detailed product information and add-to-cart. **Cart, Delivery, and Payment pages**– the critical checkout steps.



Accessibility Criteria: Each page was tested against **15 WCAG 2.2 criteria**, selected for their critical role in enabling users to complete an online shopping experience.

These criteria were grouped into **4** categories to better reflect user experience (*for the full list of criteria audited, refer to the Appendix page 25*):

- **Screen Reader Compatibility & Structure** – ensuring content can be understood by assistive technologies
- **Forms & Input Usability** – ensuring form fields are labeled, understandable, and prevent errors
- **Keyboard Navigation & Focus** – ensuring pages are usable without a mouse and navigation is logical
- **Visual Accessibility** – ensuring text, icons, and buttons are perceivable (contrast, clarity)



Scoring: On each page audited, every criterion was marked as:

- **Pass** – at least one applicable instance exists and passes requirements
- **Fail** – at least one applicable instance fails requirements
- **Not applicable** – the criterion did not apply to any component on the page

Score calculation:

For each page, a validation ratio was calculated:

*Validation ratio =
number of passed criteria / number of
applicable criteria*

- This ratio was converted into a page score out of 10
- A website's overall checkout score is the average of its Cart, Delivery, and Payment page scores

Note: This scoring provides an approximate benchmark of compliance to a subset of tested WCAG 2.2 accessibility criteria. A 10/10 score does not mean a site is fully accessible, only that it met all tested criteria on the sampled pages.

Ecommerce accessibility:

2025 readiness snapshot

Over the next chapters, you'll get a full breakdown of the following insights we've uncovered:



1. Accessibility readiness for ecommerce checkout is alarmingly low

Despite ecommerce being mainstream, with 3 in 4 Europeans shopping online in 2024, most websites remain inaccessible to millions of consumers. Our audit of the most visited ecommerce sites across five European markets shows that **94% scored below 7.5/10** on accessibility, leaving them unprepared for the requirements of the European Accessibility Act (EAA).

For people relying on screen readers, keyboard navigation, or other assistive technologies, this means the simple act of purchasing online is often blocked or impossible. Only **2%** of audited websites allow users to progress through checkout without encountering any major accessibility barriers.

This translates beyond being an inclusion gap, but also a business risk. **If users can't complete checkout, businesses can't complete the sale.**

Taking the average score across the key ecommerce checkout pages (Cart + Delivery + Payment) our findings reveal that

94%

Of e-commerce sites audited don't have accessible checkout flows.

(Scoring 7.5/10 or below)

4%

Of e-commerce sites in Europe are close to being EAA-ready for accessible checkout

(Scoring above 8/10)

2%

Of e-commerce sites audited allow users to complete checkout without critical accessibility barriers.

(Scoring above 9/10)

2. No European market is ready

Our audit compared the **most visited ecommerce websites** in each country (Germany, UK, Spain, France, Italy) alongside major global marketplaces used across Europe. The findings show that:

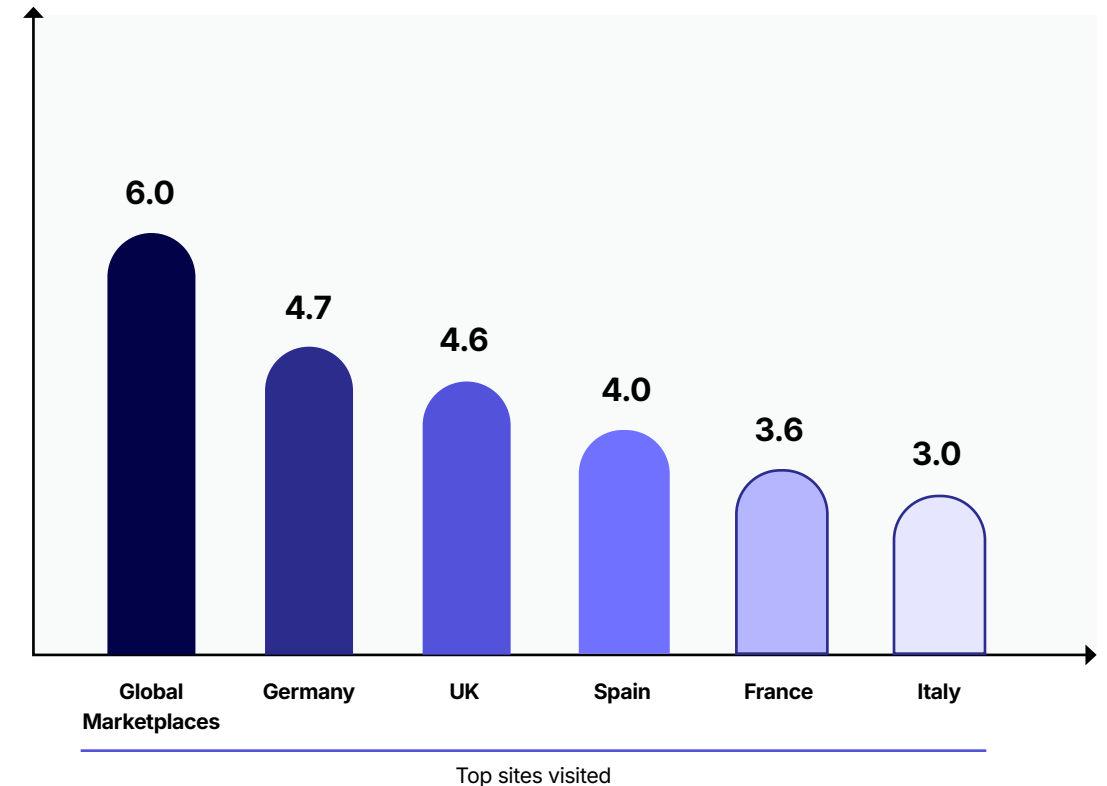
- **Global marketplaces performed best overall, with an average score of 6/10.** Some scored as high as **9/10**, proving that accessibility at scale is possible.
- However, the group average hides **huge inconsistencies**: while some performed well, other global marketplaces scored as low as **1.1/10**, showing that even industry giants are not universally ready for the EAA.
- **No European country exceeded 50% compliance on audited criteria.** Germany (with a score of 4.7/10) and the UK (4.6/10) led the pack, while France (3.6/10) and Italy (3/10) trailed.

The results portray a clear trend. Nearly all checkout experiences across Europe remain inaccessible, leaving millions of consumers excluded from a basic digital service.

Yet there is also a positive signal. High scores among some global marketplaces demonstrate that accessible checkout is not only possible, it's already being done. The challenge now is achieving consistency across the sector.

Ecommerce accessibility leaderboard, by market

Taking the average score across the key ecommerce checkout pages (Cart + Delivery + Payment)...



Note: Scores reflect the most visited ecommerce sites in each country, which may not solely be domestic brands. This is intended to capture the real online shopping experience in each market.

3. Consumers face barriers across the entire shopping journey

To capture the full end-to-end shopping experience, our audit evaluated **five key pages** that represent the ecommerce journey:

- **PLP (Product Listing Page):** where users browse product categories or search results
- **PDP (Product Detail Page):** where users view detailed information about a product
- **Cart:** where selected items are reviewed before checkout
- **Delivery:** where users enter shipping details and select delivery options
- **Payment:** where payment information is entered and the order is confirmed

Our findings reveal that accessibility barriers are present **at every stage of the ecommerce journey**, from the first click to the final payment.

Where do users get stuck?

Barriers start before checkout — **product pages are the weakest step.**

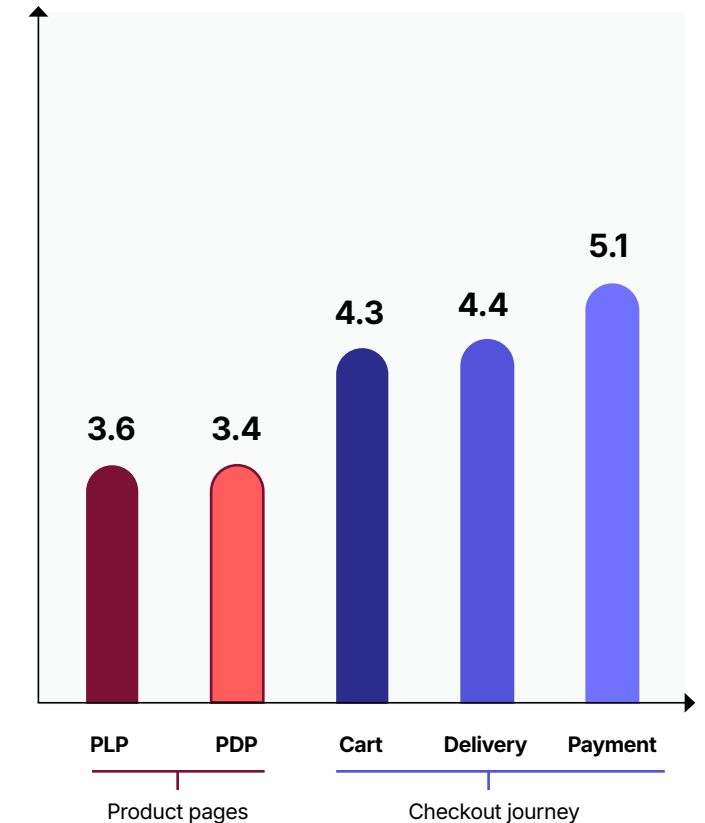
- On average, PLPs reach a score of **3.6/10 on the verified criteria, against 3.4/10 for PDPs.** In some markets, the picture is even worse: PLPs scored **2.4/10 in France** and **3/10 in Italy**, while PDPs in Italy **dropped to 2.2/10.**

As these pages are early touchpoints, this means that many users **never even make it to the checkout.**

- **Checkout pages perform slightly better,** but remain far from accessible. Cart pages display average scores of 4.3/10, Delivery pages 4.4/10 and Payment pages 5.1/10 – the highest of any page type, yet **still failing half of the accessibility criteria tested.**

In the next section, we explore what's blocking these pages — the **specific accessibility criteria that fail most often, how they break the user journey, and what action can be taken to fix them.**

Average accessibility scores by page type, based on audited criteria



Note: Percentages are based on page scores out of 10, with 10 being the highest compliance. For a full breakdown on how each market scored across the audited pages, refer to Appendix B.

4. Core accessibility criteria are breaking the checkout experience

Our audit grouped the **15 WCAG 2.2 criteria into four categories based on user impact**. Across all checkout pages, **no criteria category achieved more than 60% compliance** — meaning every group **failed at least 4 in 10 checks on average**.

These results show that accessibility barriers are deeply rooted in **how ecommerce websites are built, coded, and designed**.

Average failure rate by criteria group (and what it means for users)

- **🏠 Screen Reader Compatibility & Structure (76% failure)**: Interactive elements like buttons, fields, or tables, and page structure elements like titles, are often not coded so screen readers can identify or announce them.
- **▲ Forms & Input Usability (68% failure)**: Checkout forms frequently lack labels, input purpose, and error handling. Users can't tell what fields are for, or why their input failed.

- **📦 Visual Accessibility (59% failure)**: Text and icons often fail contrast ratios or rely on color alone to convey meaning.
- **● Keyboard Navigation & Focus (42% failure)**: Navigation is often illogical or incomplete, with missing focus indicators or "keyboard traps" that prevent users from progressing without a mouse.

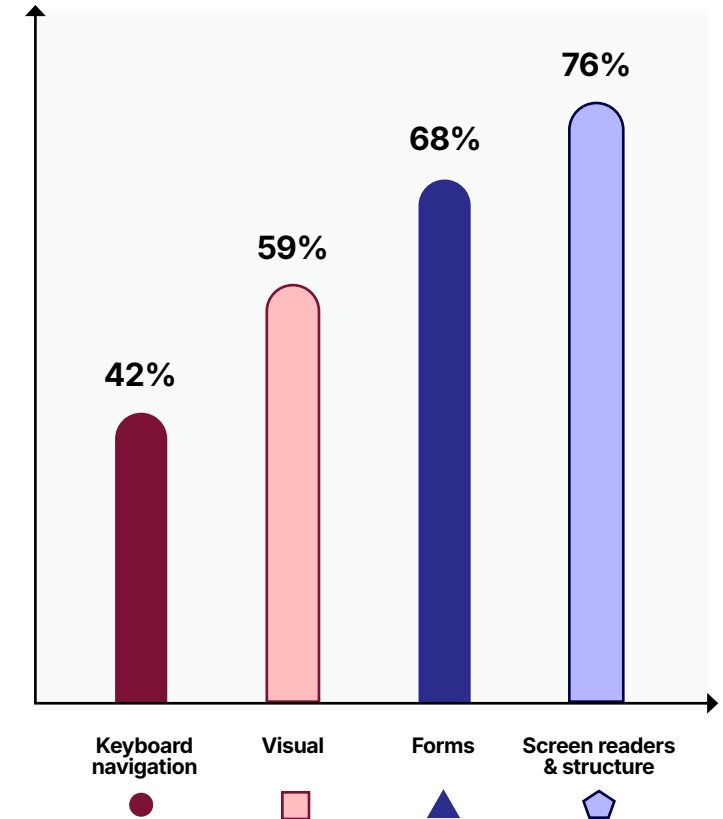
It's important to note that these four areas are deeply interconnected: fixing one often helps the others.

In short, the foundations of accessibility **are missing**. The following pages take a closer look at the most critical blocking criteria, where they fail, how they break the user journey, and what can be done to fix them.

For a full list of audited criteria and the most blocking, refer to Appendix B.

Why do users get stuck?

Average failure rate by accessibility criteria group.



I. Checkout is invisible to assistive technologies

The most common barrier: assistive tech users can't perceive key actions.

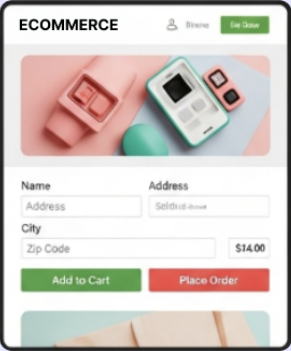
84% of audited checkout pages failed criterion 4.1.2 Name, Role, Value — making it the single most common accessibility barrier across all audits. It is followed by two other structural criteria: 1.3.1 Info & Relationships (72% failure rate), and 1.1.1 Non-text Content (68%). These three criteria are all part of the  **Screen Reader Compatibility & Structure group**, which had the **highest failure rate overall (76%)**.

What it means

Most shopping journeys contain interactive elements — like “Add to cart” buttons, form fields, quantity selectors — that are **not coded with the proper names, roles, or states**. Screen readers can't announce them to users.

To sighted shoppers, everything looks normal. But for those relying on assistive technologies, **critical actions are invisible and unusable**.

Example: Instead of hearing “Place order button,” users just hear “button” — making it impossible to confirm their order. **If you can't hear it, you can't buy it.**

What sighted users see	What assistive tech reads
	← Button...(no label)
	← Button...(no name)
	← Field...unlabeled _____
	Image...no alt text
	← Image...no alt text
	← Link...click here
	Heading...no heading level _____



I rely on a screen reader because of my visual disability, and I end up abandoning my purchase 4 out of 5 times. The hardest parts are always the missing labels, confusing instructions, and sessions that expire too fast.

If I can't figure it out after a few tries, I just leave and buy somewhere else.

— User with visual impairment, France

Many people assume accessibility is about what's on screen.

But assistive technologies don't “see” interfaces — they read the underlying code of the website (the HTML) to announce what each element is and how to interact with it.

For example, **Criterion 4.1.2 Name, Role, Value** checks whether every interactive element includes:

- a Name (what it is: “Place order”)
- a Role (what it does: “button”)
- a State (its condition: “selected,” “error,” “disabled”)

When these labels are missing or incorrect, the element may look perfectly normal to a sighted user (good UI), the user flow may seem logical to designers (good UX), but assistive technologies can't detect or announce it at all. Even beautifully designed interfaces can therefore be **functionally invisible** to assistive tech users.

Making buttons accessible

Fixing one of the most common failures — Name, Role, Value (4.1.2). Even beautifully designed buttons can be invisible to assistive technologies if they're missing the code that gives them a name (what it is), role (what it does), and state (its condition). Here's how to fix it:

Inaccessible Button Code

This is a common example where a developer uses an icon for a button but fails to provide a text alternative. A sighted user can guess what the "cart" icon means, but a screen reader has nothing to read.

Code example:

HTML

```
<button>
  <svg>...</svg> </button>
```

Where the `<svg>` tag calls a shopping cart icon (svg for real websites is more flexible and scalable).

Accessible Button Code

There are two great ways to make this button accessible. The best and simplest way is to include visible text. If the design requires only an icon, an `aria-label` can be used to provide a name for screen readers.

Method 1: Visible text (best practice)

The text inside the `<button>` tags gives it an accessible name.

Code example:

HTML

```
<button>
  <svg>...</svg>
  Add to cart
</button>
```

Method 2: Using `aria-label` for icon-only buttons

The `aria-label` attribute provides a "name" for assistive tech, without adding any visible text on the screen. ARIA provides extra information for code elements when their purpose isn't clear from the HTML code alone.

Code example:

HTML

```
<button aria-label="Add to cart">
  <svg>...</svg>
</button>
```

To recap...

Standard HTML elements (`<button>`, `<h1>`, `<a>`) are accessible by default, like road signs. Their meaning is clear to everyone including screen readers.

ARIA attributes are like **descriptive plaques** you might add when building custom or complex web components that don't have built in meaning. The ARIA plaque (`role="slider", aria-valuenow="75"`) provides the crucial context for those who need it. Use it to clarify, not replace, standard HTML.

So, you use standard, accessible HTML whenever possible. You only bring in ARIA as a helper to clarify things when you've built something more complex that doesn't have a standard HTML tag.

For the full accessibility checklist, refer to the [Contentsquare Foundation's Digital Accessibility Handbook](#).

II. Forms block users from completing purchases

Forms are at the heart of ecommerce checkout. They're how users provide their shipping, billing, and payment details.

Yet across all checkout pages audited, ▲ **forms** had a **68% failure rate**, the second highest of all categories. This includes **critical WCAG criteria such as:** 3.3.2 Labels and Instructions (missing field labels); 1.3.5 Identify Input Purpose (no autocompletion attributes); 3.3.1 Error Identification (errors not announced); 3.3.3 Error Suggestions (no guidance on how to fix errors).

Looks like an error. Sounds like nothing.

In this scenario, the color is the only cue used to indicate an error.

- Sighted users see a red box and may guess where the error is coming from
- Assistive tech users hear nothing because there is no error message. They're forced to abandon checkout.

A screen reader reads the **underlying code**, not the visual appearance. A red border is just a **visual style (CSS)** and carries no meaning in the code itself, so the screen reader has no idea an error has occurred.

What it means

On many ecommerce sites, checkout fields are missing basic labels or input purposes. Assistive tech users are often left guessing what to enter in fields like "Full name" or "Card number," because they cannot perceive them.

Autocomplete attributes are frequently missing. Our audit found that **77% of form fields failed to provide proper autocompletion** (criterion 1.3.5). This forces users, especially those relying on assistive technologies or with cognitive disabilities to manually re-enter the same information, making checkout unnecessarily long and error-prone.

Additionally, when mistakes occur, **error messages** are either unclear or not announced at all. In many cases, errors are indicated only visually (such as a red border) with no accompanying text or instructions, leaving users unsure how to fix them. For shoppers using screen readers or keyboard navigation, this creates a trial-and-error guessing game — **or a dead end.**

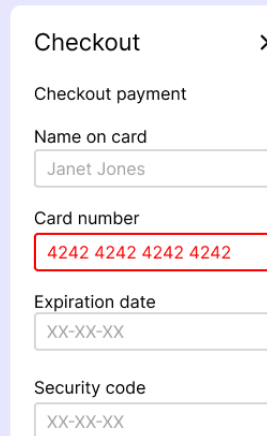
In this case, the screen reader would not say "error." It would simply read: *"Edit text, blank,"* instead of *"enter credit card number."* The user is stuck, doesn't know where the error is or how to fix it.

To make errors accessible, developers must add semantic code, such as `aria-invalid="true"` and a linked descriptive error message, that the screen reader can identify and read aloud.

When labels, instructions, and error handling fail, users can't complete purchases, even if they made it all the way to checkout.

This isn't just an accessibility issue — it's a conversion killer.

What sighted users see



Checkout X

Checkout payment

Name on card

Janet Jones

Card number

4242 4242 4242 4242

Expiration date

XX-XX-XX

Security code

XX-XX-XX

What assistive tech reads

Checkout

Checkout payment

Name on card, Janet Jones, edit

Card number, xxxx xxxx xxxx xxxx, edited

Expiration date, XX-XX-XX, edit

Security code, XX-XX-XX, edit"

III. Low contrast makes checkout hard to see

Low contrast affects users with low vision, color blindness, or aging eyesight. Many online shopping elements **don't meet basic visibility requirements**. This group of  criteria (1.4.1 Use of Color, 1.4.3 Contrast Minimum, 1.4.11 Non-text Contrast) **failed in 59% of checkout flows**.

66% of checkout pages had text or buttons that did not meet the minimum WCAG contrast ratio (4.5:1). On 61% of sites, color was the only way to indicate errors (e.g. red borders without error text), leaving color-blind and low-vision users behind.

What it means

Many ecommerce website elements are visually present but fail to meet minimum WCAG contrast requirements (4.5:1). This means that many buttons and links often blend into the background. Error states rely on color alone (e.g. red border) without text or icons. Icons and form borders are too faint to see, and text is presented in low-contrast color combinations (e.g. light grey on white).

To sighted users, the layout may appear clean and modern. But for people with low vision, color blindness, or aging eyesight, these elements simply disappear.

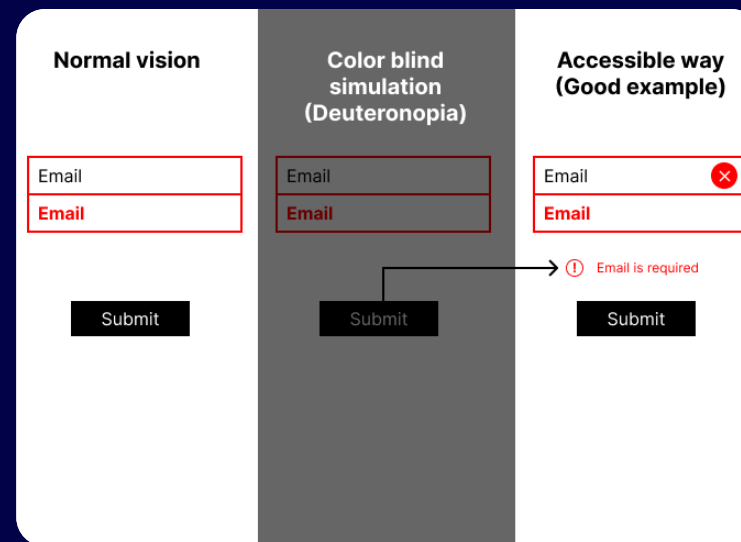


When there's an error, I don't always understand what went wrong. It's exhausting to start over every time."

— User with cognitive impairment, Italy

Every time a CAPTCHA appears, it feels like a wall. The audio versions are often impossible to understand, and the images don't work with my screen reader. CAPTCHAs are supposed to prove I'm human but they make me feel excluded.

— User with visual impairment, Germany



Color alone isn't enough

Relying only on color to signal errors leaves many users behind.

- **Normal vision:** The red border shows an error.
- **Color-blind simulation:** The red border disappears entirely — the error is invisible.
- **Accessible design:** The error is shown using multiple cues, such as the red border, error icon, and a clear text message ("Email is required").

Using both color and text/icons ensures that all users, including those with low vision or color blindness, can perceive and correct errors.

IV. Users relying on keyboards get stuck, lost, or skipped ahead

Keyboard navigation is essential for accessibility, especially for users with motor disabilities who can't use a mouse, blind users navigating via screen readers, or users with temporary impairments (e.g. hand injuries). Yet keyboard navigation ● **repeatedly failed on 42% of audited pages**.

This group of criteria includes 2.4.3 Focus Order; 2.4.7 Focus Visible; and 2.1.1 Keyboard Navigation. These are

the building blocks that allow users to navigate checkout without a mouse — whether they use a physical keyboard, a switch device, or a screen reader.

What it means

Many checkout pages **don't support logical keyboard navigation** or don't show where the user's focus is.

This can result in the focus order jumping unpredictably between elements, such as skipping from "First Name" to "Promo Code." In many cases, the focus indicator is often invisible (no highlight ring), so users can't tell where they are on the page. Other interactive elements

(buttons, dropdowns, pop-ups) **aren't reachable at all** without a mouse.

Example: A user navigates using the Tab key. The focus disappears in the middle of the form and skips the "Confirm Order" button entirely — they can't submit their purchase.

When focus breaks or disappears, users are effectively **locked out of checkout**.

The keyboard trap

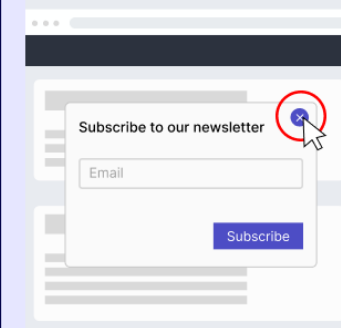
When focus gets stuck, checkout is blocked. This issue could occur when a pop-up modal (for example, "Subscribe to our newsletter") appears over the checkout page.

If the user can't escape or close the pop-up using the keyboard, then the focus gets stuck inside the modal, endlessly cycling between the text field and the "Subscribe" button. As a result, keyboard users become permanently trapped inside the pop-up.

Developer tip: This issue can be prevented by trapping keyboard focus inside the modal while it is open, and ensuring users can exit it easily:

- Provide a visible and coded "Close" button with `aria-label="Close"`.
- Make sure the button is reachable and activable using both the Enter and Space bar keys.
- Allow users to exit with the Escape key (**Esc**) and return focus to the element that opened the modal.
- When the modal closes, return focus to a logical place (usually the button or link that opened it).
- Follow the [WAI-ARIA Authoring Practices for Dialogs](#) to ensure your modal structure is keyboard and screen reader-friendly.

What users using a mouse can do



What keyboard users experience



5. Consumers face the same barriers everywhere.

Our audit shows that the same accessibility failures repeat across the most visited websites in every country. Whether the site was in Germany, Spain, France, Italy or the UK, the top blocking criteria were almost identical:

- **4.1.2 Name, Role, Value** → invisible buttons and form fields
- **1.3.1 Info & Relationships** → broken page structure
- **1.1.1 Non-text Content** → missing labels on icons and images

The majority of these failures fall within the  **Screen Reader Compatibility & Structure** group; *the very foundations of how ecommerce sites are coded*. This indicates that these barriers are not niche or localized issues. They are systemic failures because of how sites are consistently being built, inherently inaccessible to assistive technology users.

However, this consistency tells us something important. If the barriers are universal, the fixes can be too. By addressing these recurring failures, ecommerce leaders can improve accessibility for millions of consumers, across all regions, at once.

Diving deeper: Top accessibility barriers across European markets audited

Most visited websites in	Avg Score	Top Barrier 1	Top Barrier 2	Top Barrier 3
Germany	4.7	4.1.2 – Name, Role, Value 	1.3.1 – Info & Relationships 	1.1.1 – Non-text Content 
UK	4.6	1.3.1 – Info & Relationships 	4.1.2 – Name, Role, Value 	3.3.2 – Labels or Instructions 
Spain	4.0	4.1.2 – Name, Role, Value 	2.4.7 – Focus visible 	1.1.1 – Non-text Content  / 1.4.3 – Contrast minimum 
France	3.6	4.1.2 – Name, Role, Value 	1.4.3 – Contrast minimum 	3.3.2 – Labels or Instructions  / 1.3.1 – Info & Relationships 
Italy	3.0	1.3.1 – Info & Relationships 	4.1.2 – Name, Role, Value 	1.1.1 – Non-text Content 

For a detailed accessibility checklist that can help you get started, check out the Contentsquare Foundation's [Digital Accessibility Handbook](#).

Spotlight: Do accessibility statements correlate with better outcomes?

While the EAA does not require ecommerce companies to publish an accessibility statement, our audit suggests there is value in doing so.

An **accessibility statement** is a public page that outlines the site's accessibility standards and goals (e.g. WCAG), known issues or limitations, and how users can report problems or request assistance.

Out of the 50 sites audited, **62%** (31) had an accessibility statement available – and those sites **scored 8% higher** on average on tested criteria (45% vs. 37%).

We also observed a sharp rise in their publication: **56% of accessibility statements (17/30) were added in June 2025** alone, and **76%** (23/30) have been published since. This suggests that businesses are reacting directly to the EAA deadline.

While an accessibility statement alone does not guarantee compliance, it provides three important signals:

- **Commitment**, showing that accessibility is taken seriously at the leadership level;
- **Transparency**, informing users about current limitations and expectations; and
- **Engagement**, giving users a feedback loop for improvement.

In practice, accessibility statements may correlate with stronger accessibility performance overall. Just as importantly, they give users confidence that the company is addressing inclusion.



Shopping and booking websites should provide an accessibility-related customer support (e.g. phone / email) at the bottom of each page so as to be quickly reachable!

I recently tried to buy tickets for the theater online. I tried several browsers, different devices, and tried to reach the customer support (but got no reply). In the end, I had to ask a third person to assist me.

— User with vision impairment, UK

Design spotlight by Razorfish:

When accessibility meets creativity

Expert note from Jean Baptiste Burdin, Executive Creative Director at Razorfish

Many designers today share concepts that look strikingly avant-garde. But too often, these designs prioritize pure aesthetics alone, forgetting the designer's mission: solving business problems elegantly while serving the experience of all users.

While most ecommerce checkouts fail accessibility basics, there are encouraging practices. Razorfish selected sites to showcase best practices that combine creative design with accessible foundations – proving that inclusivity and originality can go hand in hand. Finding these sites was no easy task, as e-commerce sites are generally quite poorly served in terms of accessibility. The selection of websites was in the end mostly based on the components they brought for their combination of out of the box design and accessibility.

Somewhere Good Studio

Designer note on the website:

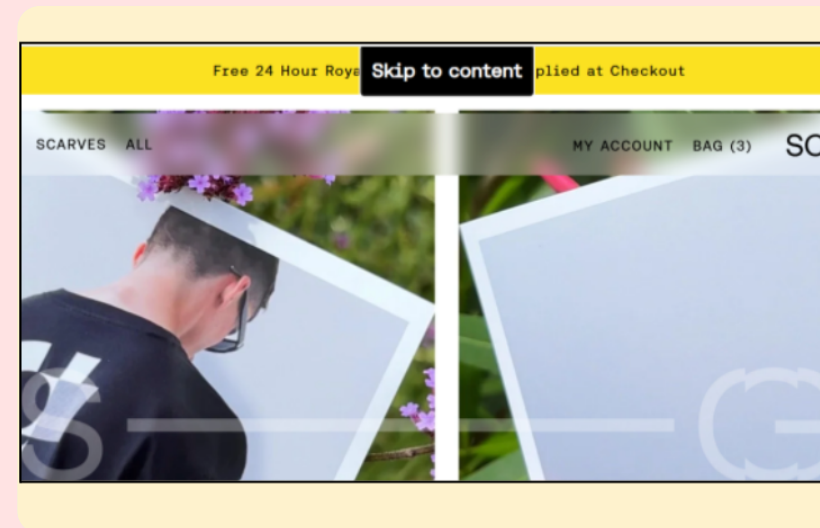
Somewhere Good Studio offers a clean immersive and audacious experience. Its clear and structured content pages offer simple navigation and full-page visuals that allow users to avoid using complex menus, image galleries or product zoom – functionalities that can be hard to navigate for some users with disabilities.

Zoom on: Skip links

Expert note: Skip links (also known as “skip navigation link”) are a simple but powerful accessibility feature. They allow assistive technologies or keyboard navigation users to bypass repeated menus and jump straight into the main content.

On this site, the skip link is clearly implemented and improves navigation for keyboard users. Its visibility could be stronger across all screen sizes, but it's a good example of how small accessibility features can be built into a creative design without disrupting the overall aesthetic.

razorfish



Too often, accessibility is seen as an aesthetic constraint. It's quite the opposite: when considered from the design stage, it becomes a driver of creativity and innovation. The brands that embrace it prove it — you can be bold, colorful, experimental, and still accessible. Accessibility doesn't diminish the experience; it makes it universal."

Jean-Baptiste Burdin | Executive Creative Director
Razorfish

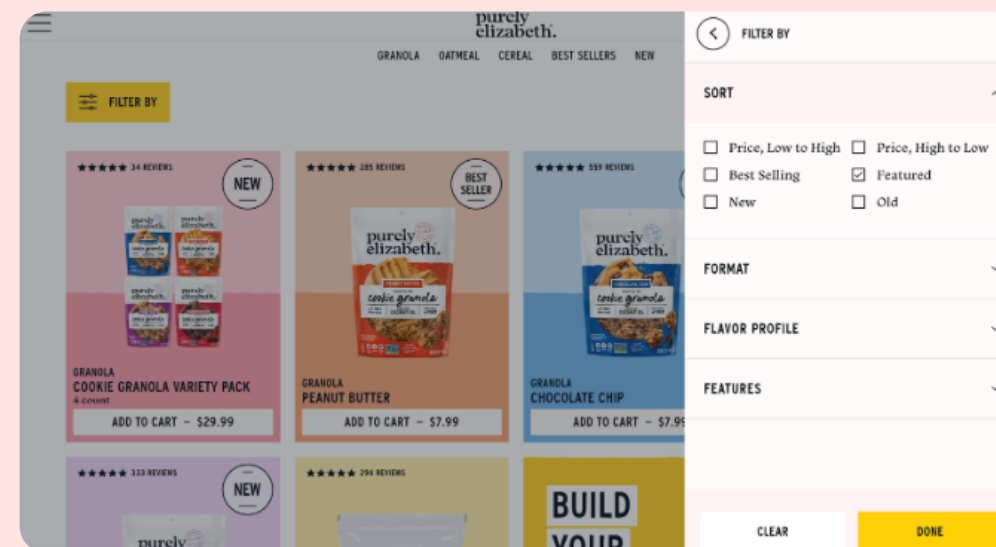
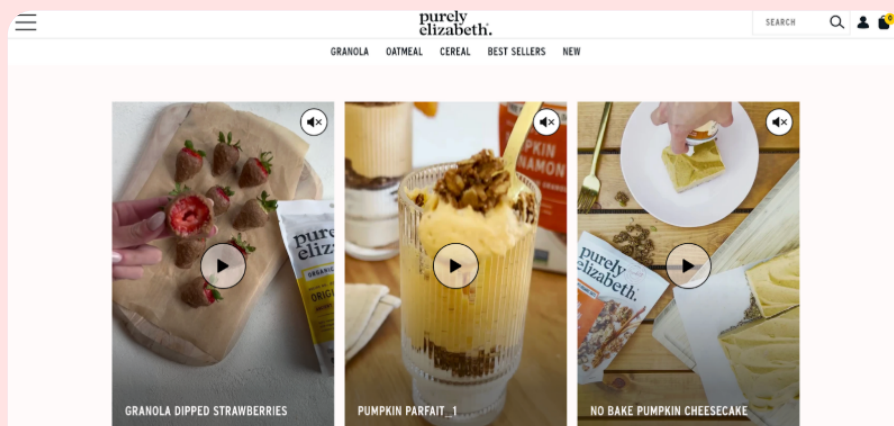
Purely Elizabeth

Designer note on the website:

Purely Elizabeth delivers a rich and cohesive experience, demonstrating that brand personality can coexist with accessibility. This site stands out for its richness of content, its polished details and a well-controlled color harmony.

Zoom on: Media and animations

Expert note: Media can be a major barrier when it isn't accessible. Elements like autoplaying, uncontrollable videos are a common failure. On Purely Elizabeth, rich content such as videos and image galleries are fully controllable with both keyboard and mouse, giving users flexibility and control of playback and navigation.



Zoom on: Color management

Expert note: Color management is carefully handled and, for the most part, ensures sufficient contrast. Filter options are simple and clear, and star ratings are accompanied by text alternatives for screen reader users.

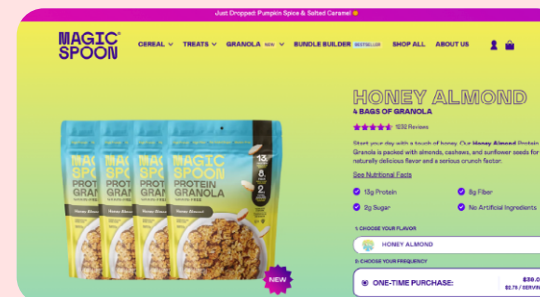
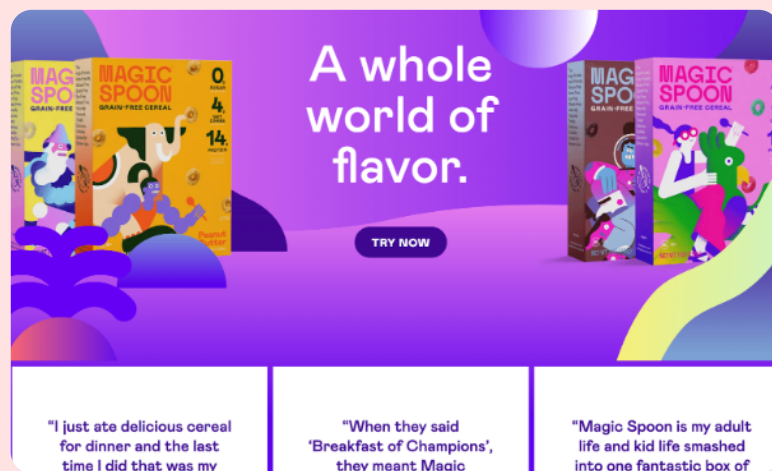
Magic Spoon

Designer note on the website:

While the use of bright colors can be difficult to combine with accessibility, Magic Spoon demonstrates that it is indeed possible, with an ultra-zesty visual palette rare on e-commerce sites. Interactive elements stand out clearly, keyboard navigation is mostly mastered with a clear and visible focus management.

Zoom on: Color management

Expert note: Bright, saturated palettes are often seen as incompatible with accessibility. Magic Spoon proves otherwise. By pairing vivid, candy-colored tones with lighter pastel backgrounds, the site maintains strong visual contrast and readability, showing that playful design and accessibility can coexist.



Zoom on: Bundle builder

Expert note: The “Bundle Builder” checkout is a standout example of accessible interaction design. Each selection is confirmed twice: first with a colored outline around the chosen product, and then with a thumbnail in the bundle summary. This redundancy of visual cues reduces user error and provides clear, immediate feedback — a best practice for accessibility.



Zoom on: Star rating system

Expert note: The star rating system conveys information not only through filled vs. empty stars, but also through color, ensuring users can understand the rating even if they don't perceive one of those dimensions correctly. Tags such as New and Bestseller are rendered as text (not images), with good contrast levels.

These expert observations show that accessibility isn't a brake on creativity. When baked into the design process, the examples of Somewhere Good Studio, Purely Elizabeth, and Magic Spoon show that digital experiences can be visually bold, innovative, and brand-driven while remaining inclusive.

Conclusion:

Digital exclusion puts both users and businesses at risk



Accessibility is no longer a standalone issue, it's a pillar of the customer experience. Brands that commit to it aren't just checking a box, they are creating value for everyone. The Contentsquare Foundation's study clearly shows that every inaccessible interaction represents a missed opportunity. Now is the time to act to make the web truly accessible to all.



Jonathan Cherki
President | Contentsquare Foundation
Founder and CEO | Contentsquare

European ecommerce is far from ready for the European Accessibility Act.

In our audit, 94% of sites scored below 7.5/10 on accessibility, and only 2% of websites let users complete a checkout flow without encountering critical barriers. No country in our sample crossed the 50% compliance mark to all verified criteria, and the same core criteria failures kept repeating – broken structures, missing labels, buttons that remain invisible to assistive technologies.

Accessibility barriers were found accumulating across all pages audited. The first touchpoints on a site, product pages (PLPs and PDPs), also turned out to be the weakest points in the entire consumer journey, blocking many users from making it to checkout. Checkout pages (cart, delivery, and payment) improved slightly, but still failed nearly 50% of all verified criteria.

This gap has real consequences. For consumers who rely on assistive technologies, this means the shopping journey is often cut short. For businesses, it means lost sales, abandoned carts, and damaged trust in a market that increasingly values inclusion.

The law now adds another layer of urgency. From June 2025, accessible checkout isn't optional, it's required. Companies that don't act risk financial, legal and reputational fallout.

Accessibility can't be bolted on at the end like a retrofit fix. It has to be **built in from the start – in how pages are designed, coded and tested.**

That being said, the majority of companies can't just scrap their sites and rebuild from scratch. So instead, we propose a dual approach:

1. **Fix critical barriers now** → Start with the high-impact, recurring issues that block users. They can often be fixed incrementally without redesigning the whole flow.
2. **Build accessibility into the process going forward** → update design systems, coding standards, and other processes so that every new release is accessible by default.

The takeaway? Businesses don't need to restart everything but they do need to start somewhere, and soon.



Appendix

A. Audit methodology

I. Our partners & auditors

The accessibility audits were carried out by partners expert in digital accessibility (Temesis, Numerik-ea and Ipedis) between June 30th to July 31st. The auditors used both automatic auditing tools and manual auditing techniques to analyse the 50 ecommerce sites listed in Appendix A. III.

Auditors

Numerik-ea/Temesis
Slim Benaziza
Andrea Dimonte
Anne Dallaserra
Chahra Redif
Emile Henry
Jeremy Heizmann
Paul Seta
Olivier Keul
Céline André
Flore Vannier

Ipedis

Guillaume Rosse
Laurent Witakenge
Davissen Appavoo
Kim Ratomahenina
Souhayl Rosun
Manshini Goordin
Allison Domrah
Mario Rasolonjatovo



Temesis is a responsible digital consulting agency. Temesis supports its customers in taking into account accessibility, eco-design and respect for user data in their digital services and content, through consulting, training and auditing.



Numerik-ea is a web agency specializing in digital accessibility. An adapted company - the team is made up mainly of people with disabilities - the agency is committed to a web accessible to all.



Ipedis is a web agency specializing in digital accessibility. An ESUS company with more than 30 collaborators to support brands on their digital accessibility journey.

II. Selected criteria

Each page was tested against **15 WCAG 2.2 criteria**, selected for their critical role in enabling users to complete an online shopping experience. The goal was not to perform a full compliance audit, but rather to identify the most blocking accessibility barriers in ecommerce.

These criteria were grouped into four categories to better reflect user experience:

- 🔲 **Screen Reader Compatibility & Structure** – ensuring content can be understood by assistive technologies
- ▲ **Forms & Input Usability** – ensuring form fields are labeled, understandable, and prevent errors
- **Keyboard Navigation & Focus** – ensuring pages are usable without a mouse and navigation is logical
- ◻ **Visual Accessibility** – ensuring text, icons, and buttons are perceivable (contrast, clarity)

15 WCAG 2.2 criteria for ecommerce accessibility

Group	WCAG ID	Plain language description	Example of what It means in ecommerce checkout context	Group	WCAG ID	Plain language description	Example of what It means in ecommerce checkout context
 Screen Reader Compatibility & Structure	4.1.2 Name, Role, Value (A)	Interactive elements must tell assistive tech what they are, what they do, and their state.	"Place order" button must be announced as "Place order," not just "button."	 Keyboard Navigation & Focus	2.1.1 Keyboard (A)	All functionality must work with a keyboard.	Ex: Users must be able to tab to the payment button
	1.3.1 Info & Relationships (A)	Headings, tables, and groups must be structured properly.	An order summary table must announce row/column headers, not just a block of text.		2.1.2 No Keyboard Trap (A)	Users must not get stuck with a keyboard.	Can't get trapped inside a popup.
	1.1.1 Non-text Content (A)	Functional images/icons must have alt text.	Cart icons, delete buttons, payment logos must be labeled. A trash can icon must be announced as "Remove item from cart," not just "button"		2.4.3 Focus Order (A)	Navigation order must make sense.	Tabbing moves through fields logically.
 Forms & Input Usability	3.3.2 Labels & Instructions (A)	All fields must have clear labels and guidance.	Credit card field must be labeled "Card number", not left blank.	 Visual Accessibility	1.4.3 Contrast Minimum (AA)	Text & buttons must have enough contrast with the background.	Ex. Payment button text must meet a 4.5:1 ratio.
	1.3.5 Identify Input Purpose (AA)	Fields must expose their purpose to assistive tech.	Autocomplete attributes like "billing address" or "email" must be present.		1.4.11 Non-text Contrast (AA)	Icons, borders, visual indicators must be visible.	Ex. Checkbox outline visible against background.
	3.3.1 Error Identification (A)	Errors must be clearly indicated and explained.	If the card number is wrong, the field must be marked with an error and message.		1.4.1 Use of Color (A)	Color cannot be the only way of showing meaning.	Required fields cannot be marked "red only" without text.
	3.3.3 Error Suggestions (AA)	Error messages must suggest fixes to the problem	Ex: "Invalid card number — please enter 16 digits."				
	3.3.4 Error Prevention (AA)	Users must review/correct before submitting.	Review page before "Place order."				

III. Score calculation

Accessibility scores are calculated on a scale of 0 to 10, based on the proportion of WCAG criteria met on each audited page.

Page level:

- If a criterion is met across a page, it is marked as valid.
- If a criterion fails on a page, it is marked as invalid.
 - Please note that not all criterion elements are tested on a page. As soon as one failure is found, the auditor moves on to the next criterion for the page.
- If a criterion does not apply to any element on a page, it is marked as not applicable, and is therefore excluded from the calculation of the page score.

The page score is then calculated as:

Score = 10 x [Total number of valid criteria ÷ (Total number of valid + invalid criteria)].

Journey level

To calculate the full shopping journey score, we averaged results across the five key page types: PLP (Product Listing), PDP (Product Detail), Cart, Delivery, and Payment.

To calculate the checkout journey score, we averaged results across the three core checkout pages: Cart, Delivery, and Payment.

Note of caution:

Given that only a selection of pages and criteria were audited, these scores provide an approximate snapshot of accessibility performance. They should not be interpreted as compliance rates. A score of 10/10 does not indicate full WCAG compliance or confirm that an entire website is accessible.

IV. Website selection & pages audited

A total of 50 ecommerce websites were audited across France, Germany, Italy, Spain, UK and global marketplaces. The distribution is as follows:

- **9** sites per country
- **5** global marketplaces

Selection method

Websites were chosen based on traffic data from [Similarweb](#) (premium version) as of March 25th 2025. For each country, the highest-traffic ecommerce sites were selected. Where the same global marketplaces appeared across multiple countries, they are regrouped as the “global marketplaces” category. All audits were conducted in the local language of the website.

Breakdown of sites audited

Disclaimer: These websites represent the most visited ecommerce sites used by consumers in each market, based on Similarweb traffic rankings, and are not necessarily domestic brands headquartered in the listed countries.

Pages audited

For each site, we analyzed a representative sample of five key page types that together reflect the full ecommerce journey:

- **PLP (Product Listing Page)** – browsing categories or search results
- **PDP (Product Detail Page)** – viewing detailed product information
- **Cart** – reviewing selected items before checkout
- **Delivery** – entering shipping details and selecting delivery options
- **Payment** – entering payment details and confirming the order

This approach ensured consistency across websites while capturing the most critical steps of the shopping journey.

France (9)	Germany (9)	Italy (9)	Spain (9)	UK (9)	Global marketplaces (5)
leboncoin.fr	kleinanzeigen.de	subito.it	milanuncios.com	argos.co.uk	amazon.com
cdiscount.fr	otto.de	ibs.it	elcorteingles.es	boots.com	aliexpress.com
fnac.fr	lidl.de	zalando-prive.it	wallapop.com	tkmaxx.com	temu.com
boulanger.com	eventim.de	vivaticket.com	miravia.es	johnlewis.com	ebay.com
veepee.fr	thalia.de	libraccio.it	casadellibro.com	currys.co.uk	etsy.com
auchan.fr	tchibo.de	qvc.it	cecotec.es	ticketmaster.co.uk	
e.leclerc.fr	home24.de	macrolibrarsi.it	mercadona.es	very.co.uk	
rakuten.fr	decathlon.de	swappie.com/it	conforama.es	halfords.com	
showroomprive.com	baur.de	aosom.it	game.es	smythstoys.com	

B. Additional data & tables

I. Top 10 most blocking accessibility barriers

Most failed criteria	WCAG ID	Simple description
1	4.1.2 – Name, Role, Value	Screen readers must know what an element is, its purpose, and state
2	1.3.1 – Info & Relationships	Headings, lists, tables must be programmatically correct
3	1.1.1 – Non-text Content	Images/icons must have text alternatives
4	1.4.3 – Contrast minimum	Text & buttons must have 4.5:1 contrast
5	3.3.2 – Labels or Instructions	Every form field needs an explicit label
6	2.4.3 – Focus Order	Navigation order must be logical
7	2.4.7 – Focus visible	Users must see where keyboard focus is
8	2.1.1 – Keyboard Navigation	All functionality available by keyboard
9	1.4.11 – Non-text Contrast	Icons, borders, visual indicators must be visible
10	1.3.5 – Identify input purpose	Fields like “name” or “email” must expose purpose to assistive tech

B. Additional data & tables

II. Accessibility performance by page and market

	PLP	PDP	Cart	Delivery	Payment
Global marketplace	5.9	4.9	6.4	6.2	6.5
Germany	3.8	3.7	5.4	5.1	5.8
UK	4.5	3.6	4.8	4.4	5.8
Spain	3.0	3.9	3.4	4.5	4.8
France	2.4	3.0	4.1	3.5	5.0
Italy	3.0	2.2	2.9	3.6	3.4