

Evidence file: Annex I accessibility requirements

Requirement-by-requirement record of what was measured and what remains to be checked

Service provider	Example Shop Ltd (sample)
Service	Example online shop (sample)
Member State(s) where the service is offered	DE, FR, IE
Measured on	2026-10-09
Service category (Article 2(2))	e-commerce services (Art. 2(2)(f))
Document date	2026-10-15
Prepared by	SmileStory Inc.
Responsibility	Prepared by SmileStory Inc. from automated measurement. The service provider is responsible for the content of this information and for completing the marked fields.

For each requirement this file shows the official text, the automated checks mapped to it (via WCAG and EN 301 549 clauses — our interpretation), the result and the findings. Requirements that automated testing cannot assess are marked as manual.

Pages measured

1. **P1** <https://shop.example/>
2. **P2** <https://shop.example/products/>
3. **P3** <https://shop.example/products/sample-item>
4. **P4** <https://shop.example/account/register>

Section III — General accessibility requirements related to all services covered by this Directive in accordance with Article 2(2)

The provision of services in order to maximise their foreseeable use by persons with disabilities, shall be achieved by:

III(a) — Manual check only — cannot be assessed by automated testing

ensuring the accessibility of the products used in the provision of the service, in accordance with Section I of this Annex and, where applicable, Section II thereof;

Automated checks: —

III(b)(i) — No automated failures — manual check remaining

making the information available via more than one sensory channel;

Automated checks: audio-caption, video-caption

III(b)(ii) — No automated failures — manual check remaining

presenting the information in an understandable way;

Automated checks: html-has-lang, html-lang-valid, html-xml-lang-mismatch, valid-lang

III(b)(iii) — Manual check only — cannot be assessed by automated testing

presenting the information to users in ways they can perceive;

Automated checks: —

III(b)(iv) — No automated failures — manual check remaining

making the information content available in text formats that can be used to generate alternative assistive formats to be presented in different ways by the users and via more than one sensory channel;

Automated checks: aria-hidden-body, aria-required-children, aria-required-parent, definition-list, dlitem, list, listitem, p-as-heading, table-fake-caption, td-has-header, td-headers-attr, th-has-data-cells

III(b)(v) — Failures found (automated)

presenting in fonts of adequate size and suitable shape, taking into account foreseeable conditions of use and using sufficient contrast, as well as adjustable spacing between letters, lines and paragraphs;

Automated checks: avoid-inline-spacing, color-contrast-enhanced, color-contrast, meta-viewport

Automated checks	Findings
Elements must meet minimum color contrast ratio thresholds color-contrast · WCAG 1.4.3	4 occurrence(s) on P1, P2, P3, P4 P1 footer > p P2 footer > p P3 footer > p P4 footer > p

III(b)(vi) — Failures found (automated)

supplementing any non-textual content with an alternative presentation of that content; and

Automated checks: aria-meter-name, aria-progressbar-name, image-alt, input-image-alt, object-alt, role-img-alt, svg-img-alt

Automated checks	Findings
Images must have alternative text image-alt · WCAG 1.1.1	1 occurrence(s) on P3 P3 img[src\$="photo.svg"]:nth-child(5)

III(b)(vii) — Manual check only — cannot be assessed by automated testing

providing electronic information needed in the provision of the service in a consistent and adequate way by making it perceivable, operable, understandable and robust;

Automated checks: —

III(c) — Failures found (automated)

making websites, including the related online applications, and mobile device-based services, including mobile applications, accessible in a consistent and adequate way by making them perceivable, operable, understandable and robust;

Automated checks: area-alt, aria-allowed-attr, aria-braille-equivalent, aria-command-name, aria-conditional-attr, aria-deprecated-role, aria-hidden-body, aria-hidden-focus, aria-input-field-name, aria-meter-name, aria-progressbar-name, aria-prohibited-attr, aria-required-attr, aria-required-children, aria-required-parent, aria-roledescription, aria-roles, aria-toggle-field-name, aria-tooltip-name, aria-valid-attr-value, aria-valid-attr, audio-caption, autocomplete-valid, avoid-inline-spacing, blink, button-name, bypass, color-contrast-enhanced, color-contrast, css-orientation-lock, definition-list, dlitem, document-title, duplicate-id-active, duplicate-id-aria, duplicate-id, form-field-multiple-labels, frame-focusable-content, frame-title-unique, frame-title, html-has-lang, html-lang-valid, html-xml-lang-mismatch, identical-links-same-purpose, image-alt, input-button-name, input-image-alt, label-content-name-mismatch, label, link-in-text-block, link-name, list, listitem, marquee, meta-refresh-no-exceptions, meta-refresh, meta-viewport, nested-interactive, no-autoplay-audio, object-alt, p-as-heading, role-img-alt, scrollable-region-focusable, select-name, server-side-image-map, summary-name, svg-img-alt, table-fake-caption, target-size, td-has-header, td-headers-attr, th-has-data-cells, valid-lang, video-caption

Automated checks	Findings
Elements must meet minimum color contrast ratio thresholds color-contrast · WCAG 1.4.3	4 occurrence(s) on P1, P2, P3, P4 P1 footer > p P2 footer > p P3 footer > p P4 footer > p
Images must have alternative text image-alt · WCAG 1.1.1	1 occurrence(s) on P3 P3 img[src\$="photo.svg"]:nth-child(5)

III(d) — Manual check only — cannot be assessed by automated testing

where available, support services (help desks, call centres, technical support, relay services and training services) providing information on the accessibility of the service and its compatibility with assistive technologies, in accessible modes of communication.

Automated checks: —

Annex I, Section IV — additional requirements for specific services

Only the parts that apply to the type of service concerned are relevant. They are listed for reference and need a manual review.

(g) E-Commerce services:

- (i) providing the information concerning accessibility of the products and services being sold when this information is provided by the responsible economic operator;
- (ii) ensuring the accessibility of the functionality for identification, security and payment when delivered as part of a service instead of a product by making it perceivable, operable, understandable and robust;

- (iii) providing identification methods, electronic signatures, and payment services which are perceivable, operable, understandable and robust.

Notices

- SmileStory Inc. is not a certification body. This document does not certify conformity; whether the service meets the requirements is decided by the authorities responsible for checking the compliance of services (Article 23) and, ultimately, the courts.
- This document is not legal advice.
- As of 2026-10-15, no harmonised standards and no technical specifications under Article 15 for Directive (EU) 2019/882 had been published in the Official Journal of the European Union; EN 301 549 V3.2.1 is referenced only under Directive (EU) 2016/2102. Meeting EN 301 549 or WCAG therefore does not give a presumption of conformity with Directive (EU) 2019/882 (Article 15(1)).
- Annex IV technical documentation and the EU declaration of conformity apply to manufacturers of products, not to service providers, and are not part of this document.

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