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Analysis of the results of the SME Panel consultation on the socio-economic impact of new measures to improve the accessibility of goods and services for people with

disabilities

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1 Results of the SME Panel consultation

1.1 Introduction

The European Commission, Directorate-General Justice has conducted an SME Panel survey through Enterprise Europe Network¹ between end of April and end of July 2012.

The survey focused on mainstream accessible goods and services used by most people, not the so-called assistive devices². The aim of this survey was to gain a better understanding of the most important sectors and to identify problematic issues from the industry's perspective, which may arise as a result of current legal fragmentation concerning the regulation of accessibility of goods and services and market issues. Of particular importance is the market supply of goods and services for which accessibility is included in the design stage to take into account the needs of the widest variety of users (i.e. Design for All/Universal Design).

The first part of the questionnaire concerned general information about the company. The subsequent questions aimed to provide information about how accessibility is considered in the organisation when providing goods and services, as well as a number of estimates of the costs and benefits derived from providing accessible goods and services. Some of the questions used answering scales that allowed indication of degree of agreement, or the degree of importance etc. of a particular item. These scales have numbers going from high to low in combination with the corresponding meaning in words for some or all of the numbers. The questionnaire is at the end of this document in Annex B. Detailed tables can be found in Annex A.

1.2 Profile of respondents

A total of **180 valid responses** were received. Companies that have responded to the survey are distributed throughout the EU, but do not constitute a geographically balanced sample. Considering the country in which the companies that responded have their headquarters, 14 Member States are represented, although six of them (Portugal, Germany, Italy, Hungary, Sweden, and Poland) account for 80% of respondents (see Figure 1). However, when considering the Member States in which these companies operate, then the sample has representation of all EU Member States and also other countries beyond EU borders (see Figure 2).

http://ec.europa.eu/enterprise/policies/sme/small-business-act/listening-to-smes/index_en.htm

http://www.mcss.gov.on.ca/en/mcss/programs/social/directives/directives/ODSPDirectives/income_support/9_6_ODS_P_ISDirectives.aspx, i.e. special devices used to replace, compensate for, or improve the functional abilities of people with disabilities like mobility and visual/hearing aids, orthotics/prosthetics, speech devices, medical supplies, environmental controls, and respiratory devices.

Figure 1 - Q1. In what country is your company located?

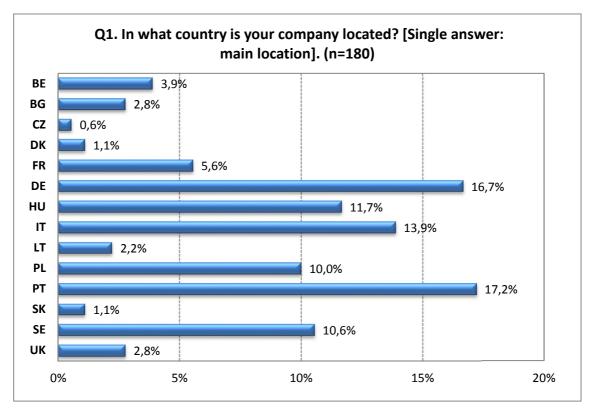
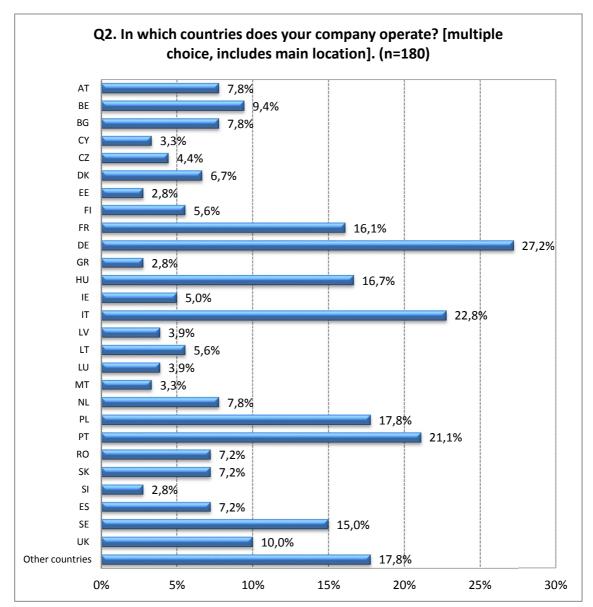
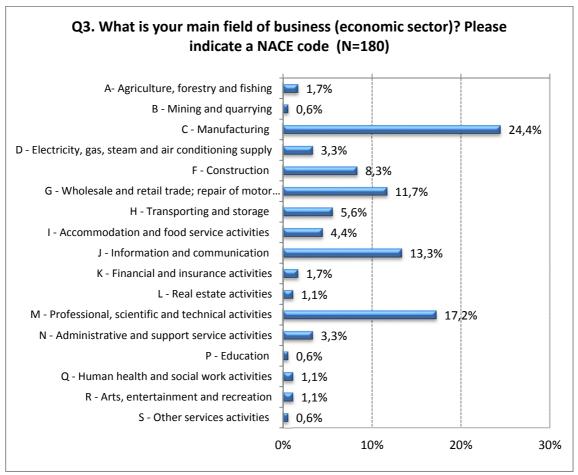


Figure 2 - Q1+Q2. In which countries does your company operate?



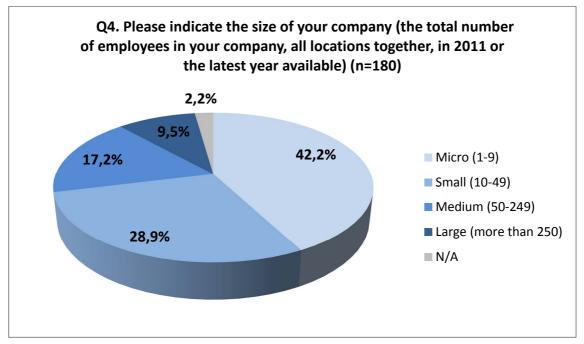
The main economic sectors in which companies surveyed operate are "Manufacturing" and "Professional, scientific and technical activities". There is also a significant presence of companies falling under the sectors of "Information and communication", "Wholesale and retail trade; repair of motor vehicles and motorcycles", and "Construction" (see Figure 3).

Figure 3 - Q3. What is your main field of business?



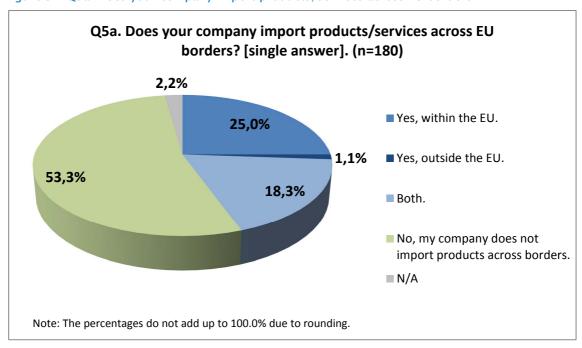
Of the 180 responses received, 42.2% were from micro companies (1-9 employees), 28.9% from small companies (10-49 employees), 17.2% from medium companies (50-249 employees), 9.5% from large companies (more than 250 employees) and 2.2% from companies that did not specify their size (see Figure 4).

Figure 4 - Q4. Indicate the size of your company



Although most companies that responded to the survey do not import or export products and services, there are a significant number of companies importing or exporting goods and services to other countries, both inside and outside the EU (see Figure 5 and Figure 6).

Figure 5 - Q5a. Does your company import products/services across EU borders?



Q5b. Does your company export products/services across EU borders? [single answer]. (n=180)

0,6%

21,1%

2,8%

Yes, within the EU.

Yes, outside the EU.

No, my company does not import products across borders.

N/A

Figure 6 – Q5b. Does your company export products/services across EU borders?

More than half of the respondents sell products or services to public authorities (see Figure 7) and four out of five of these companies have stated that accessibility requirements are sometimes or frequently included in tender specifications (see Figure 8).

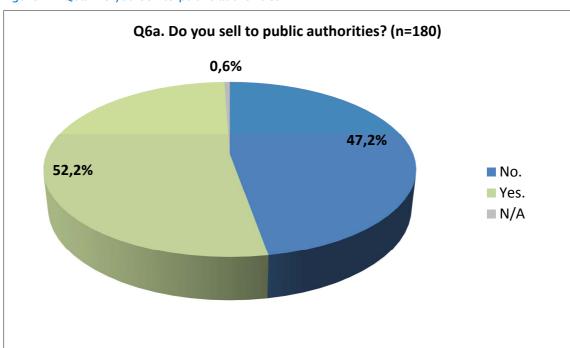
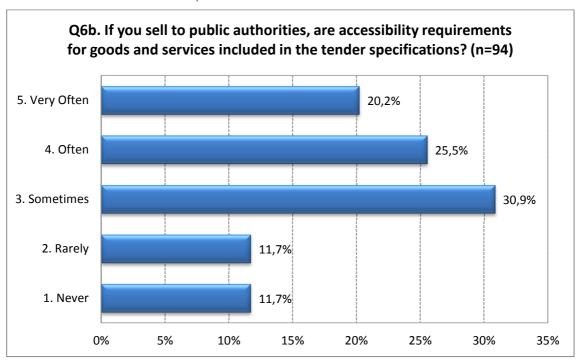


Figure 7 - Q6a. Do you sell to public authorities?

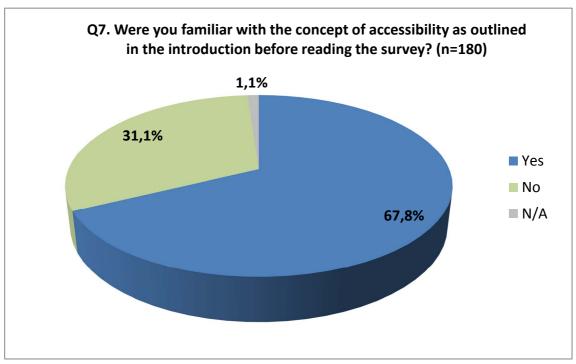
Note: The percentages do not add up to 100.0% due to rounding.

Figure 8 - Q6b. If you sell to public authorities, are accessibility requirements for goods and services included in the tender specifications?



Approximately two in three companies surveyed declared they are familiar with the concept of accessibility as outlined in the introduction to the survey (see Figure 9).

Figure 9 – Q7. Were you familiar with the concept of accessibility as outlined in the introduction before reading the survey?



About half of the companies surveyed (88 of 180) provide customers accessible goods and services, while 32.8% do not. It is noteworthy that 13.3% declare not knowing whether or not they provide accessible goods and services, and that 5.0% did not answer this question (see Figure 10).

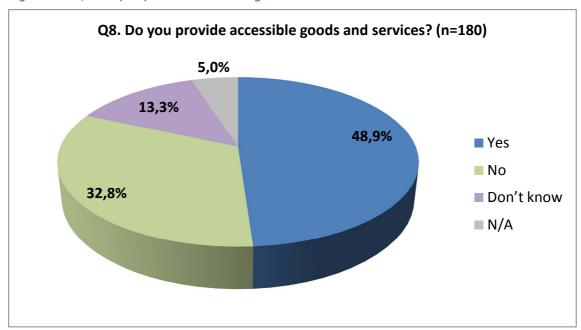


Figure 10 -Q8. Do you provide accessible goods and services?

There is some correlation between the size of the companies surveyed and their familiarity with the concept of accessibility described in the introduction to the survey, since that familiarity is higher in medium-sized or large companies than it is in small or micro ones. Medium-sized enterprises have a greater familiarity with the concept of accessibility than large ones, although the differences are not significant.

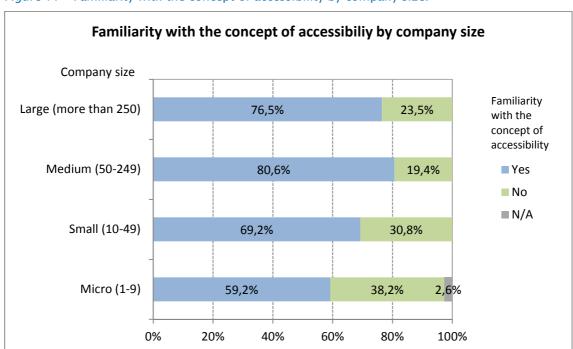


Figure 11 - Familiarity with the concept of accessibility by company size.

There is also a clear correlation between the provision of accessible goods and services and familiarity with the concept of accessibility. However, the figure below shows that still one out of five companies who claim to provide accessible goods and services said they were unfamiliar with this concept.

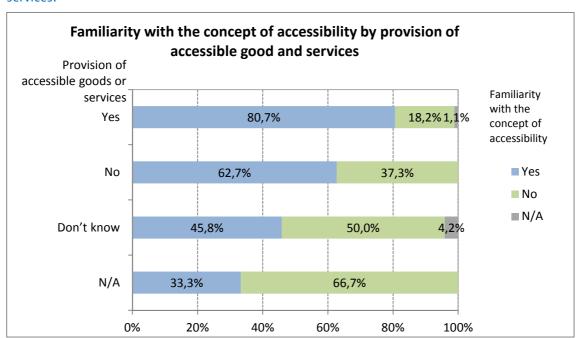


Figure 12 - Familiarity with the concept of accessibility by provision of accessible goods and services.

The majority of the organisations that provide accessible goods and services operate in the sectors of "built environment" or "information and communication". Also there are companies

that provide transportation goods and services, legal advisory services, accessibility consultancy and training, consultancy and auditing services (see Figure 13).

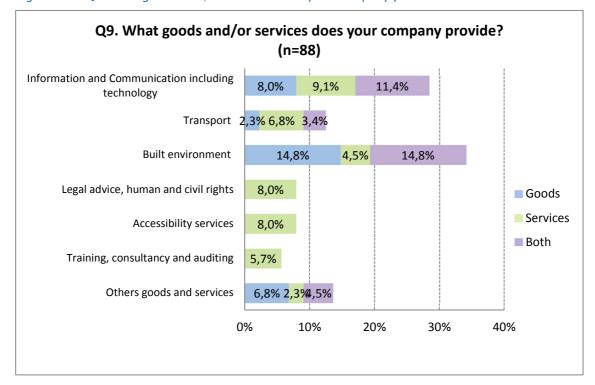


Figure 13 - Q9. What goods and/or services does your company provide?

1.3 SMEs and accessibility

1.3.1 Reasons for providing accessible goods and services

For the 88 respondents that provide accessible goods and services, the most important reason for doing so is corporate social responsibility / corporate image of the company. The importance of this reason has been evaluated with an average of 4.7 on a scale of 1 to 6, where 1 means that it is not an important reason to provide accessible goods and services and 6 is a very important reason (see Figure 14). Other reasons deemed important are compliance with legislation, the fact that accessibility features are a good way of reaching more clients and that accessibility involves no significant additional costs (with mean values of 4.6, 4.0 and 3.6 respectively).

In general, companies surveyed give less importance to the profitability of providing accessible goods and services, and the fact that accessibility allows participation in additional public procurement tenders (mean values of 3.4 and 3.2).

Companies have cited other reasons to provide accessible goods and services besides those explicitly included in the answer categories. These other reasons include those related to respect for civil rights, the need to respond appropriately to the needs of customers and loyalty to the mission of the company.

"Ensuring equal opportunities. The human and civil rights of the society and all obtainable benefits cannot be dependent on a particular medical condition".

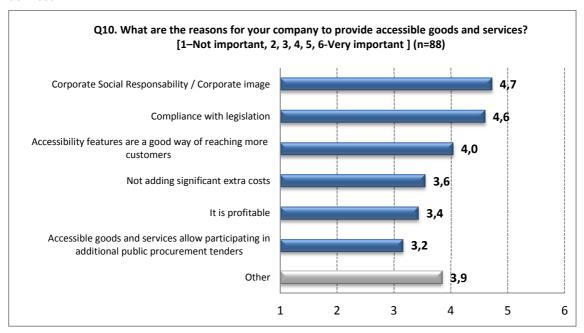
"We want all people to have access to information and news".

"Product adjustments based on requirements from customers".

"As user experience experts, our goal is to design products that are usable and accessible for the target groups".

"Continuation of the mission of the company, as a universal provider of the service and social character".

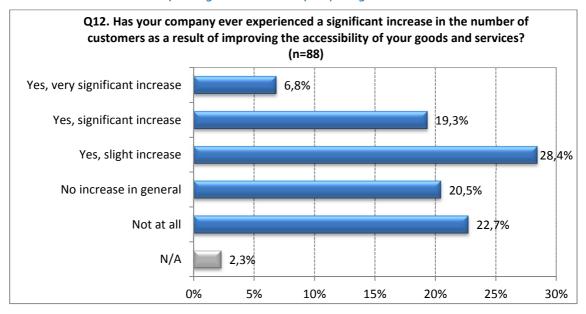
Figure 14 - Q10. What are the reasons for your company to provide accessible goods and services?



1.3.2 The market for accessible goods and services

Respondents' perceptions on the effect that providing accessible goods and services has on the number of customers vary widely. While 26.1% consider that the effect was significant or very significant, and 28.4% that the effect was positive but slight, 20.5% noted that in general, accessibility has not impacted significantly on the number of customers, and 22.7% said, more categorical, not having experienced any increase in their clientele derived from improving the accessibility of its goods and services (see Figure 15).

Figure 15 - Q12. Has your company ever experienced a significant increase in the number of customers as a result of improving the accessibility of your goods and services?



Perceptions of companies are somewhat less positive when referring to the effect that improvements in the accessibility of their goods and services have had on their financial benefits. The proportion of those who believe that these effects were significant or very significant are 20.4%, and of those that consider the effects have been slight were 18.2%. On the contrary, those that believe that in general its benefits have not been impacted were 34.1%. Those who think that the improvement of accessibility has not had any effect at all on its results were 22.7% (see Figure 16). As one would expect, an increase in customers correlated with an increase in financial benefit (see Figure 17).

Figure 16 - Q13. Has your company ever experienced a significant increase in financial benefits as a result of improving the accessibility of your goods and services?

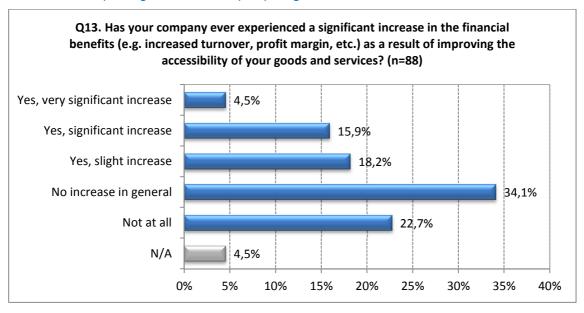
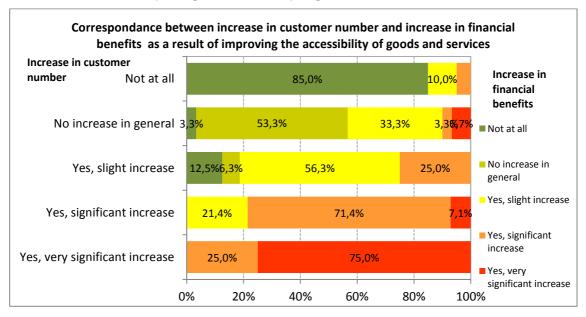


Figure 17 - Correspondance between increase in customer number and increase in financial benefits as a result of improving the accessibility of goods and services



The proportion that represents accessible goods and services on the total of the supply of goods and services provided by the companies who responded to the survey varies greatly, and so is the proportion of total revenues related to accessible goods and services. Although there is a correlation, it is not possible to establish a direct link between the share of accessible goods and services and their revenues. Overall the proportion of total revenues related to the provision of accessible goods and services is perceived as lower than the proportion that represents accessible goods and services on total offer of the company (see Figure 18 and Figure 19).

Figure 18 - Q14a. Please estimate the proportion of accessible goods and services currently provided by your company as part of its total offer.

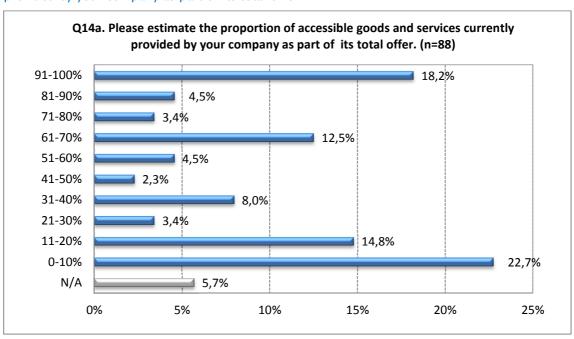
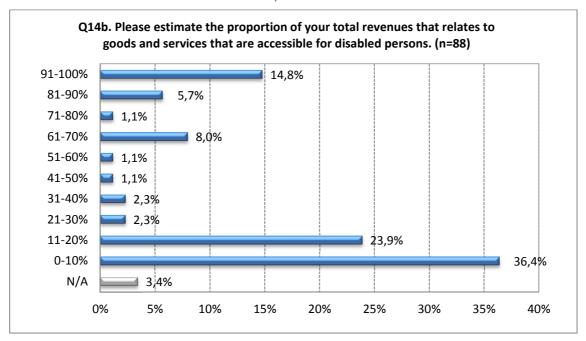


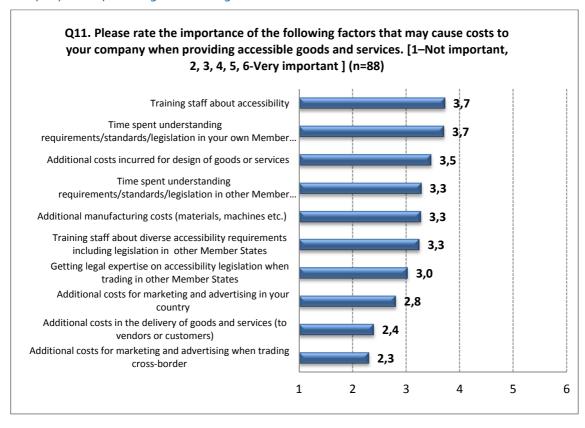
Figure 19 - Q14b. Please estimate the proportion of your total revenues that relates to goods and services that are accessibile for disabled persons



1.3.3 Cost of providing accessible goods and services

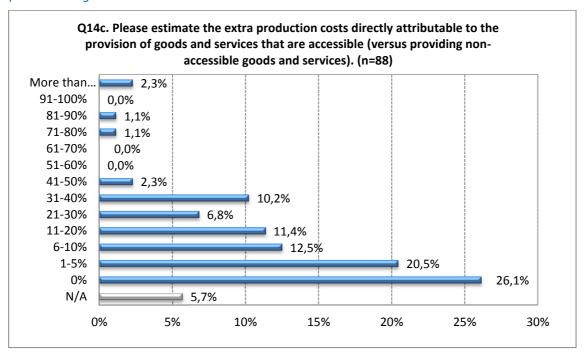
Providing accessible goods and services may pose specific costs. The main factors considered by the respondents that may cause costs when providing accessible goods and services are training staff about accessibility and the time spent understanding requirements, standards and legislation in their own Member State (both with an average rating of 3.7 on a 1 to 6 scale). Also cited as relatively important were the additional design costs (3.5), the time spent understanding requirements/standards/legislation in other Member States when trading cross-border (3.3), the additional manufacturing costs (3.3), the training of staff about diverse accessibility requirements including legislation in other Member States (3.3), and the cost for getting legal expertise on accessibility legislation when trading in other Member States (3.0). Other factors such as additional costs for marketing and advertising or in the delivery of goods and services are considered less important (see Figure 20).

Figure 20 – Q11. Please rate the importance of the following factors that may cause costs to your company when providing accessible goods and services.



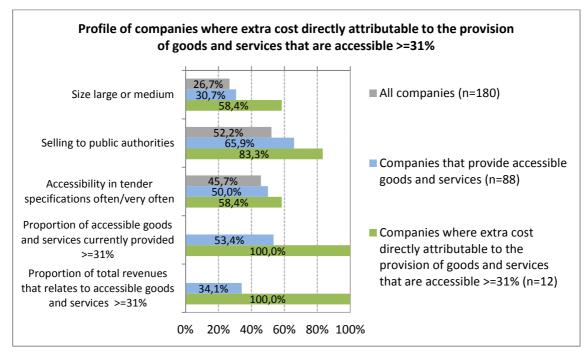
The estimated extra production cost directly attributable to the provision of accessible goods and services compared to those who do not also has a very wide range of variation, although almost half of surveyed companies that provide accessible goods and services consider these extra costs below 5% or non-existent (see Figure 21).

Figure 21 - Q14c. Please estimate the extra production costs directly attributable to the provision of goods and services that are accessible.



For 77% of the companies that provide accessible goods and services the extra production costs attributable to the provision of goods and services that are accessible represents a maximum of 30% of their costs. About 17% of companies stated that their extra costs are equal to or greater than 31%, however, these costs are generally offset by the income received, as they all have experienced increases in the number of customers and profits resulting from the provision of goods and services accessible to over 31%. Compared to all the surveyed companies and to all companies that provide accessible goods and services, these companies facing high extra production costs are larger, sell more to public authorities and frequently found more accessibility requirements for goods and services included in the tender specifications (see Figure 22).

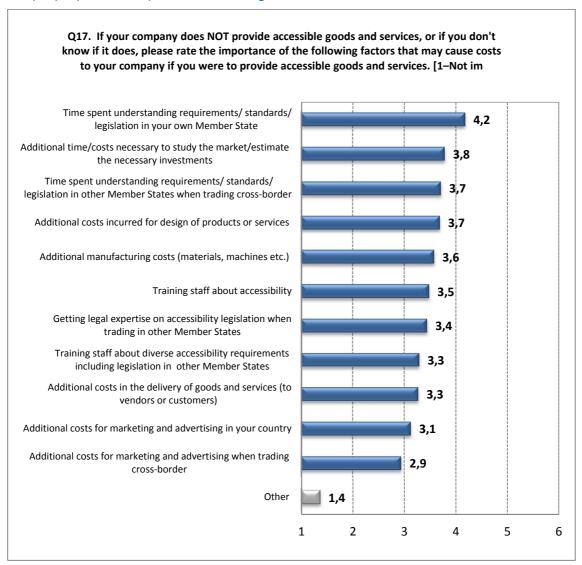
Figure 22 - Profile of companies where extra cost directly attributable to the provision of goods and services that are accessible >=31%.



Companies that do not provide accessible goods and services (or those that do not know if they do so) considered that the most important factor that could cause additional cost to them if they did provide accessible goods and services is the time spent to understand the requirements, standards and legislation about accessibility in their country. This factor has been rated with 4.2 on a scale of 1 to 6).

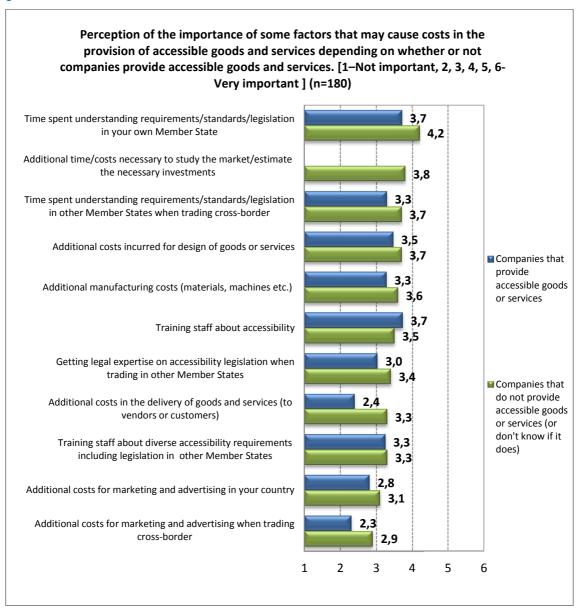
Other factors deemed important are the additional time and costs necessary to study the market and to estimate the necessary investments (rated to 3.8), the time spent understanding requirements, standards and legislation in other Members States when trading cross-borders and the additional cost of designing accessible products or services (both rated to 3.7), additional manufacturing costs (3.6), training staff about accessibility (3.5) and costs relating to getting legal expertise on accessibility legislation when trading in other Member State (3.4). Additional costs related to distribution and training of staff on the diverse accessibility requirements in other Member Satetes and those arising from marketing and advertising in the country of origin or third countries have a somewhat smaller, but significant ranking (between 3.3 and 2.9 average rating on the 1 to 6 scale used) (see Figure 23).

Figure 23 - Q17. If your company does not provide accessible goods and services, or if you don't know if it does, please rate the importance of the following factors that may cause costs to your company if you were to provide accessible goods and services.



Companies that do not provide accessible goods and services tend to give more weight to the factors that may cause costs in the provision of accessible goods and services than companies that provide this kind of good and services. The only factor of cost that is seen less important by companies that do not provide accessible goods and services in comparison with those that do is training staff about accessibility.

Figure 24 – Perception of the importance of some factors that may cause costs in the provision of accessible goods and services depending on whether or not companies provide accessible goods and services.



1.3.4 Obstacles to trade in accesible goods and services

A significant part of the surveyed companies operating in more than one Member State (31.7%) and an even higher percentage (52.8%) imported or exported goods and services across EU borders. The level of internationalisation of companies that provide accessible goods and services is lower (22.7% operate in more than one Member State and 40.9% exported or imported across the borders of the EU).

Three in four companies that provide accessible goods and services declared never having to deal with accessibility standards of other countries that were different from those applied in the country they are based (see Figure 25), although it should be noted that many of them do not export goods and services to other Member States. Out of all the companies that provide accessible goods and services, 8.4% reported having to deal with it frequently or very frequently 14.2% reported having to deal with it less frequently (see Figure 25). Considering only exporting companies that provide accessible goods and services, the percentage of those who have had

to deal with accessibility rules different from the ones in their main location rises to 26.8% (see Figure 26).

Figure 25 – Q15. Has your company ever had to deal with accessibility rules in another Member State that are different from the ones in your country?

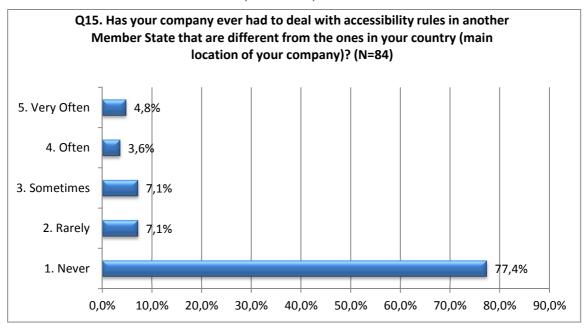
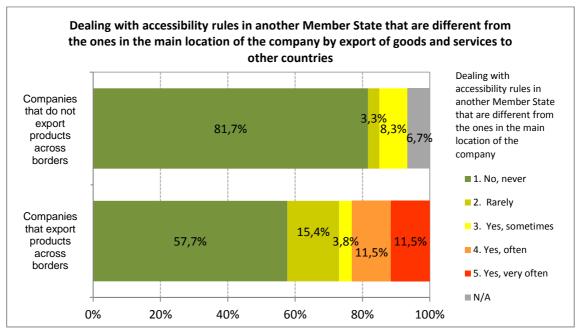


Figure 26 - Dealing with accessibility rules in another Member State that are different from the ones in the main location of the company by export of goods and services to other countries.

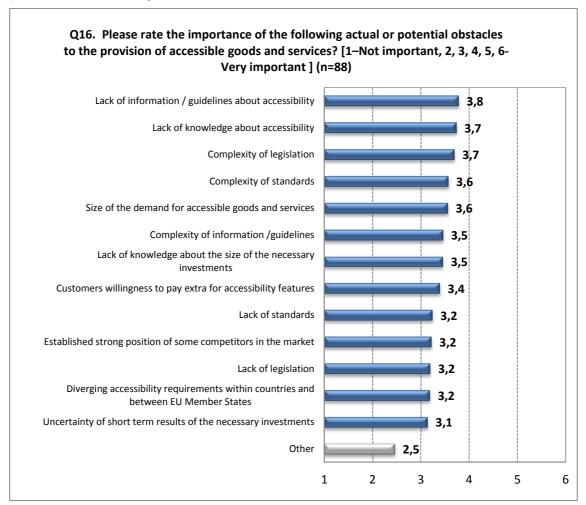


Actual or potential obstacles to the provision of accessible goods and services to the surveyed companies seen as most important are lack of information and guidelines on accessibility (scored to 3.8 on a scale of 1 to 6), lack of knowledge of accessibility, and complexity of the legislation (both scored with 3.7).

Also considered as major obstacles are the complexity of standards and the weak aggregate demand for goods and services accessible (both with a value of 3.6 on the scale proposed), complexity of information and guidelines and lack of knowledge about the size of investment required (both factors scored 3.5) and the unwillingness of customers to pay more for accessible goods and services (3.4).

With a score somewhat lower, but not negligible, are rated other factors such as the lack of standards and legislation, the established strong position of some competitors in the market and the differences in the accessibility requirements within countries and between EU Member States (all these factors scored 3.2), and uncertainties about short-term performance of the investments required (3.1) (see Figure 27).

Figure 27 – Q16. Please rate the importance of the following actual or potential obstacles to the provision of accessible goods and services?



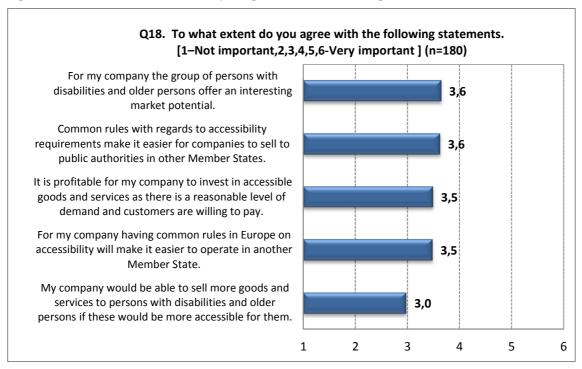
1.3.5 Market potential and possible effect of common European standards

Perceptions of the companies surveyed show some confidence in the market potential for accessible goods and services. The degree of agreement with the statement "For my company, the group of persons with disabilities and older persons offer an interesting market potential" is moderate (3.6 points on a scale of 1 to 6). A considerable degree of agreement was also raised in the statement "It is profitable for my company to invest in accessible goods and services as there is a reasonable level of demand and customers are willing to pay" (3.5 points on a scale of

1 to 6). However, there is less optimism about the chances of selling more goods and services to people with disabilities and elderly people if these were more accessible for them (3.0 points on the scale proposed).

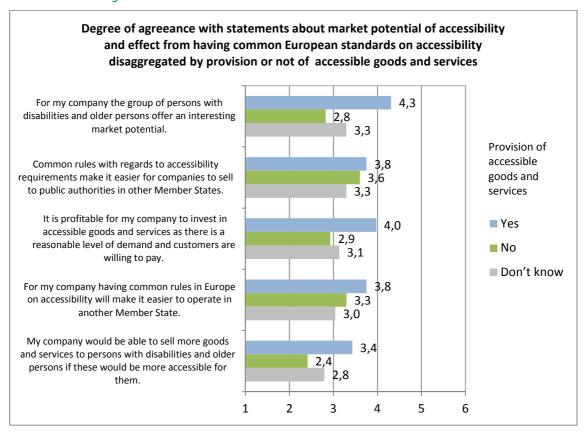
Confidence in the positive effect that would result from having common European standards related to accessibility requirements is also moderate. The statements "Common rules with regards to accessibility requirements make it easier for companies to sell to public authorities in other Member States" and "For my company having common rules in Europe on accessibility will make it easier to operate in another Member State" have obtained average rates of 3.6 and 3.5, respectively (see Figure 28).

Figure 28 - Q18. To what extent do you agree with the following statements?



The level of agreement with statements about market potential of accessibility and effect from having common European standards on accessibility disaggregated by provision or not of accessible goods and services. In general, companies that provide accessible goods and services are more optimistic about the market potential of these products or services, and have a greater confidence in the positive effects that would result from having common European standards on accessibility.

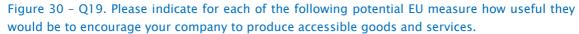
Figure 29 - Degree of agreeance with statements about market potential of accessibility and effect from having common European standards on accessibility disaggregated by provision or not of accessible goods and services.

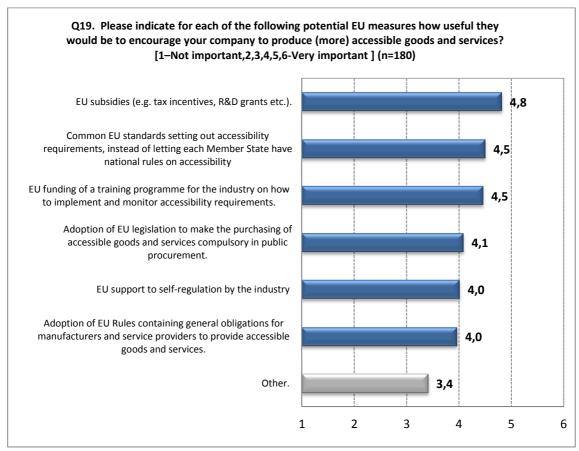


1.3.6 EU measures to encourage companies to provide more accessible goods and services

Among the potential measures that the EU could take to encourage companies to produce more accessible goods and services, the respondents valued as most important the financial support (subsidies, tax incentives and R&D grants), the EU funding of a training programme for the industry on how to implement and monitor accessibility requirements and the adoption of common standards setting out accessibility requirements (instead of letting each Member State have national rules on accessibility). The importance of these measures has been assessed, respectively, with 4.8, 4.5 and 4.5 on a scale of 1 to 6.

In addition, other measures considered important include the adoption of EU legislation to make the purchasing of accessible goods and services compulsory in public procurement, EU support to self-regulation by industry and the adoption of EU rules containing general obligations for manufacturers and service providers to provide accessible goods and services. The importance of these measures has been scored 4.1, 4.0 and 4.0 respectively (see Figure 30).





The arguments of the respondents on why the measures which were rated more positively would be good for the company provide interesting insights.

The measure valued as most important was, as mentioned above, the establishment of EU subsidies (such as tax incentives and R&D grants). In relation to this measure, respondents underscored its promoting effect of the innovation process needed to meet the requirements of users:

"European funds are likely to increase the implementation of measures of positive discrimination in favor of the most vulnerable segments, including the population with physical disabilities."

"Friendly EU funds in order to be a relevant input to modify our way of producing."

"Support would mean that we could have costs covered in order to analyze whether there is a need in our market and in which way we could fulfill the requirements."

"Tax incentives and grants strengthen the interest of private customers to make an investment."

"A small company is undertaking a continuous innovation process and tax incentives or automatic grants could be very useful in order to sustain the big costs for applied research."

The adoption of common EU standards and legislation on accessibility is seen as a way to be more competitive in a broader market and to achieve greater efficiency in resource use:

"We will be more competitive in a wider market".

"Common EU standards make it possible to use our experience in different countries".

"Common EU legislation is a great convenience when it comes to operating on different EU markets. It's definitely better for selling goods to other EU countries. It's most of all time saving, so far being wasted to understand and implement different law."

"It would make it easier to compete; the international market would be more similar to its home market."

"By working in a similar way we would accomplish better use of resources."

"Common rules enable companies to manufacture a product that can be sold in every Member State."

"Since the company is active in many different Member States common EU standards/rules about accessibility would facilitate the provision of the company's accessible goods."

"Harmonization of regulations and processes is a competitive advantage."

However, it was also stressed that there are other positive incentive measures and encouragement to those imposing obligations that may interfere with the functioning of the market:

"I am against regulations imposed by the EU. In my opinion, EU should motivate by different encouragements, not by interference into market or unnatural requirements."

It was also underlined the importance of improving training on accessibility and to promote awareness and dissemination of good practice in this area:

"I believe that improved education and knowledge of accessibility can help encourage people's attitudes towards understanding the critical demand and need for accessible goods and services".

"European financing for a training programme for industry is the best way to implement and monitorize accessibility requirements."

"A training program on monitoring strategies would refine procedures and implementation plans, synchronizing them whenever possible with the best European practices in this area."

The various measures proposed are not seen as alternatives but as complementary, as they all contribute to improving the ability of SMEs to provide goods and services accessible:

"I selected as 'very useful' the majority of answers since I believe that all actions shoud be considered as necessary to draw the attention on the subject of accessibility. This would have a positive effect on our business activity since we are specializing in design and realization of accessible websites, both for public administration and for private users."

The companies have also made additional comments regarding barriers to the provision of accessible goods and services. One of the issues raised in the comments is additional costs involving accessibility and the fact that these costs could affect the competitiveness of European products and services in international markets:

"For our company it is extremely expensive to develop, demands a critical customer mass."

"The manufacture of our products adds additional costs and special procedures, namely to accessibility issues."

"If the cost of providing accessible services would increase, it would be a barrier to provide the service. It's hard to estimate the demand for accessible goods and what effect it has on the number of customers/turnover."

"Cost/benefit (compared to non-European manufacturers): Europe should guarantee a level playing field."

"This theme should be framed in terms of international competitiveness and harmonized in an intermediary way to avoid discrepancies among foreign competitors, which can affect the competitiveness capacity of European products in international markets."

Also mentioned were the obstacles resulting from the lack of common rules on accessibility, and lack of effective measures to ensure compliance with existing standards:

"The obstacles are related to the lack of regulation and common rules that should define the necessary requirements for the provision of goods and services accessible to all. This definition would mean the starting-up for the implementation of training and information sessions aiming at raising the awareness of companies in this field and ensure that its services and products could provide answers to the needs of all consumers and targeted citizens."

"Market and costs are not regulated. Competent authorities are not doing efficient work."

"At the moment no sanctions are foreseen in case of non conformity to the current legislation on this subject."

Another important aspect has to do with the lack of information on accessibility and the training needs to overcome the bureaucratic hurdles faced by companies:

"A lack of information towards the people (end users) who need it. Price of the end product is sometimes too high compared to what the end user can afford."

"We need to invest in information, in addition to mandatory regulations, and make everyone understand that accessibility has benefits for all citizens, not only for disabled people."

"Main obstacles for SMEs are bureaucratic: customs agencies create problems for exporting, in fact many complicated documents are to be filled. SMEs do not have money to pay for export consultants."

Other comments relate to individual diversity of disability and the need to enforce the equal rights of all citizens:

"Additional common standards are unrewarding because of the strong individual distinctions of disabilities."

"In Europe it is necessary that everyone has the same rights and possibilities."

1.4 Conclusion

European SMEs that provide accessible goods and services do so primarily for reasons of corporate social responsibility/corporate image and compliance with legislation. However, respondents also take into account economic factors including the ability to get more customers without a significant increase in costs. The profitability of providing accessible goods and services, and the posibility of participating in additional public procurement tenders are also reasons to provide accessible goods and services, but these reasons are generally perceived as less important than those mentioned above. However, 54.5% of companies that provide accessible goods and services have increased their clientele as a result of improving the accessibility of their goods and services, and 38.6% have experienced increases in their financial benefits for this reason.

Training staff on accessibility and time spent on understanding requirements, standards and legislation are the main factors that may cause additional costs to SMEs when providing accessible goods and services, more than the extra costs of design and manufacturing that accessibility may involve. Companies that do not provide accessible goods and services (or those that do not know if they do it) also considered the time spent on understanding requirements, standards and legislation as the most important element that could cause additional cost. In light of these responses, it seems clear that a simpler regulatory environment and more uniform requirements and standards on accessibility across the EU are crucial to boost the accessible products and services in the European market.

The respondents generally regarded that the extra costs of accessibility are relatively low: almost half of the surveyed SMEs consider extra production cost directly attributable to the provision of accessible goods and services below 5% or non-existent. In cases where the additional costs attributable to the production of accessible goods and services are higher, these are offset by increases that companies have experienced in its clientele and its economic benefits. Moreover, the perception of the importance of the costs attributable to accessibility is lower in companies that provide goods and services accessible than those who do not provide these, pointing to the existence of prejudices that tend to overestimate the extra effort for a company to produce and market accessible goods and services.

The most important obstacles to the provision of accessible goods and services by European SMEs are: lack of information and guidelines on accessibility, lack of knowledge of accessibility, and complexity of legislation. In addition, the complexity of the standards, weak aggregate demand for accessible goods and services, complexity of information and guidelines and lack of knowledge about the size of investment required, are also considered as important obstacles. With a somewhat lower importance, but not negligible, other factors are cited such as the unwillingness of customers to pay more for accessible goods and services, the lack of standards and legislation, the strong position of some competitors in the market, the differences in the accessibility requirements within countries and between EU Member States and uncertainties about short-term performance of the investments required.

Perceptions of the companies surveyed show some confidence in the market potential for accessible goods and services. Confidence in the positive effect that would result from having common European standards related to accessibility requirements is moderate. These perceptions are influenced by knowledge and direct experience in accessibility. In general, companies that provide accessible goods and services are significantly more optimistic about the market potential of these products or services, and have a greater confidence in the positive effects that would result from having common European standards on accessibility.

The respondents consider financial support (such as subsidies, tax incentives and R&D grants), EU funding of a training programme for the industry on how to implement and monitor accessibility requirements and the adoption of common standards setting out accessibility requirements (instead of different sets of national rules on accessibility) as important measures that the EU could take to encourage companies to provide more accessible goods and services. In relation to the establishment of subsidies, respondents underscore its promoting effect of the innovation process needed to meet the requeriments of users. The adoption of common EU standards and legislation on accessibility is seen by companies as a way to be more competitive in a broader market and to achieve greater efficiency in resource use. Besides, companies also support more positive incentive measures and encouragement to those imposing obligations that may interfere with the functioning of the market, and underlined the

importance of improving training on accessibility and to promote awareness and dissemination of good practice in this area.

The adoption of EU legislation to make the purchasing of accessible goods and services compulsory in public procurement, EU support to self-regulation by the industry and the adoption of EU rules containing general obligations for manufacturers and service providers to provide accessible goods and services are also considered important. The various measures proposed are not seen as alternatives but as complementary, as they all contribute to improving the ability of SMEs to provide accessible goods and services.

Annex A – Detailed tables

Q1. In what country is your company located? [Single answer: main location]

Country	Number	% (n=180)
BE	7	3,9%
BG	5	2,8%
CZ	1	0,6%
DK	2	1,1%
FR	10	5,6%
DE	30	16,7%
HU	21	11,7%
IT	25	13,9%
LT	4	2,2%
PL	18	10,0%
PT	31	17,2%
SK	2	1,1%
SE	19	10,6%
UK	5	2,8%

Q1 + Q2. In which countries does your company operate? [multiple choice, includes main location].

Country	Number of companies	%(n=180)
AT	14	7,78%
BE	17	9,44%
BG	14	7,78%
CY	6	3,33%
CZ	8	4,44%
DK	12	6,67%
EE	5	2,78%
FI	10	5,56%
FR	29	16,11%
DE	49	27,22%
GR	5	2,78%
HU	30	16,67%
IE	9	5,00%
IT	41	22,78%
LV	7	3,89%
LT	10	5,56%
LU	7	3,89%
MT	6	3,33%
NL	14	7,78%
PL	32	17,78%
PT	38	21,11%
RO	13	7,22%
SK	13	7,22%
SI	5	2,78%
ES	13	7,22%
SE	27	15,00%
UK	18	10,00%
Other countries	32	17,78%

Q3. What is your main field of business (economic sector)?

Economic sector	Number	% (N=180)
A- Agriculture, forestry and fishing	3	1,67%
B - Mining and quarrying	1	0,56%
C - Manufacturing	44	24,44%
D - Electricity, gas, steam and air conditioning supply	6	3,33%
F - Construction	15	8,33%
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	21	11,67%
H - Transporting and storage	10	5,56%
I - Accommodation and food service activities	8	4,44%
J - Information and communication	24	13,33%
K - Financial and insurance activities	3	1,67%
L - Real estate activities	2	1,11%
M - Professional, scientific and technical activities	31	17,22%
N - Administrative and support service activities	6	3,33%
P - Education	1	0,56%
Q - Human health and social work activities	2	1,11%
R - Arts, entertainment and recreation	2	1,11%
S - Other services activities	1	0,56%

Q4. Please indicate the size of your company (the total number of employees in your company, all locations together, in 2011 or the latest year available)

Size of company	Number	% (N=180)
Micro (1-9)	76	42,22%
Small (10-49)	52	28,89%
Medium (50-249)	31	17,22%
Large (more than 250)	17	9,44%
N/A	4	2,22%

Q5a. Does your company import products/services across EU borders? [single answer].

Import products/services across EU borders	Number	% (N=180)
Yes, within the EU.	45	25,0%
Yes, outside the EU.	2	1,1%
Both.	33	18,3%
No, my company does not import products across borders.	96	53,3%
N/A	4	2,2%

Q5b. Does your company export products/services across EU borders? [single answer].

Export products/services across EU borders	Number	% (N=180)
Yes, within the EU.	38	21,1%
Yes, outside the EU.	5	2,8%
Both.	30	16,7%
No, my company does not export products across borders.	106	58,9%
N/A	1	0,6%

Q6a. Do you sell to public authorities?

Sell to public authorities	Number	% (N=180)
No.	85	47,2%
Yes.	94	52,2%
N/A	1	0,6%

Q6b. If yes, are accessibility requirements for goods and services included in the tender specifications?

	Number of requested records	% (N=94)
1. Never	11	11,70%
2. Rarely	11	11,70%
3. Sometimes	29	30,85%
4. Often	24	25,53%
5. Very Often	19	20,21%

Q7. Were you familiar with the concept of accessibility as outlined in the introduction before reading the survey?

Familiarity with the concept of accessibility	Number	% (N=180)
Yes	122	67,78%
No	56	31,11%
N/A	2	1,11%

Q8. Do you provide accessible goods and services?

Provide accessible goods and services	Number	% (N=180)
Yes	88	48,89%
No	59	32,78%
Don't know	24	13,33%
N/A	9	5,00%

Q9. What goods and/or services does your company provide? [multiple choice]

	Goods	Services	Both	Total	% (N=88)
Information and					
Communication	7	8	10	25	28,4%
including technology					
Transport	2	6	3	11	12,5%
Built environment	13	4	13	30	34,1%
Legal advice, human and civil rights		7		7	8,0%
Accessibility services		7		7	8,0%
Training, consultancy and auditing		5		5	5,7%
Others goods and services	6	2	4	10	11,4%

Q10. What are the reasons for your company to provide accessible goods and services? [1–Not important, 2, 3, 4, 5, 6-Very important]

Reasons for your company to provide accessible goods and services	Average score	N	Standard deviation
It is profitable	3,4	81	1,85
Corporate Social Responsability / Corporate image	4,7	88	1,53
Compliance with legislation	4,6	88	1,54
Accessibility features are a good way of reaching more customers	4,0	85	1,72
Not adding significant extra costs	3,6	87	1,76
Accessible goods and services allow participating in additional public procurement tenders	3,2	82	2,08
Other	3,9	20	2,35

Q11. Please rate the importance of the following factors that may cause costs to your company when providing accessible goods and services. [1–Not important, 2, 3, 4, 5, 6-Very important]

Factors that may cause costs when providing accessible goods and services	Average score	N	Standard deviation
Time spent understanding requirements/standards/legislation in your own Member State	3,7	87	1,69
Time spent understanding requirements/standards/legislation in other Member States when trading cross-border	3,3	73	1,91
Additional costs incurred for design of goods or services	3,5	88	1,66
Additional manufacturing costs (materials, machines etc.)	3,3	82	1,53
Additional costs for marketing and advertising in your country	2,8	79	1,68
Additional costs for marketing and advertising when trading cross-border	2,3	68	1,75
Additional costs in the delivery of goods and services (to vendors or customers)	2,4	77	1,62
Training staff about accessibility	3,7	77	1,65
Training staff about diverse accessibility requirements including legislation in other Member States	3,3	68	1,74
Getting legal expertise on accessibility legislation when trading in other Member States	3,0	66	1,71
Other	2,2	13	2,19

Q12. Has your company ever experienced a significant increase in the number of customers as a result of improving the accessibility of your goods and services?

Increase in the number of customers as a result of improving the accessibility of goods and services	Number	% (N=88)
Yes, very significant increase	6	6,82%
Yes, significant increase	17	19,32%
Yes, slight increase	25	28,41%
No increase in general	18	20,45%
Not at all	20	22,73%
N/A	2	2,27%

Q13. Has your company ever experienced a significant increase in the financial benefits (e.g. increased turnover, profit margin, etc.) as a result of improving the accessibility of your goods and services?

Increase in the financial benefits as a result of improving the accessibility of goods and services	Number	% (N=88)
Yes, very significant increase	4	4,55%
Yes, significant increase	14	15,91%
Yes, slight increase	16	18,18%
No increase in general	30	34,09%
Not at all	20	22,73%
N/A	4	4,55%

Q14a. Please estimate the proportion of accessible goods and services currently provided by your company as part of its total offer.

Proportion of accessible goods and services currently provided	Number	% (N=88)
0-10%	20	22,73%
11-20%	13	14,77%
21-30%	3	3,41%
31-40%	7	7,95%
41-50%	2	2,27%
51-60%	4	4,55%
61-70%	11	12,50%
71-80%	3	3,41%
81-90%	4	4,55%
91-100%	16	18,18%
N/A	5	5,68%

Q14b. Please estimate the proportion of your total revenues that relates to goods and services that are accessible for disabled persons.

Proportion of total revenues that relates to goods and services that are accessible for disabled persons	Number	% (N=88)
0-10%	32	36,36%
11-20%	21	23,86%
21-30%	2	2,27%
31-40%	2	2,27%
41-50%	1	1,14%
51-60%	1	1,14%
61-70%	7	7,95%
71-80%	1	1,14%
81-90%	5	5,68%
91-100%	13	14,77%
N/A	3	3,41%

Crosstabulation 14a-Proportion of accessible goods * 14b-Proportion of total revenues

					14b-Pro	portion	of total re	evenues				
14a-Proportion of accessible goods	0- 10%	11- 20%	21- 30%	31- 40%	41- 50%	51- 60%	61- 70%	71- 80%	81- 90%	91- 100%	N/A	Total
0-10%	18											18
11-20%	1	12										13
21-30%	1	1	1									3
31-40%	2	3		2								7
41-50%		1			1							2
51-60%	2						1				1	4
61-70%	2	2					4					8
71-80%	1		1					1				3
81-90%									4			4
91-100%	3					1			1	9		14
N/A		1								2	9	12
Total	30	20	2	2	1	1	5	1	5	11	10	88

Q14c. Please estimate the extra production costs directly attributable to the provision of goods and services that are accessible (versus providing non-accessible goods and services).

Extra production costs directly attributable to the provision of goods and services that are accessible	Number	% (N=88)
0%	23	26,14%
1-5%	18	20,45%
6-10%	11	12,50%
11-20%	10	11,36%
21-30%	6	6,82%
31-40%	9	10,23%
41-50%	2	2,27%
51-60%	0	0,00%
61-70%	0	0,00%
71-80%	1	1,14%
81-90%	1	1,14%
91-100%	0	0,00%
More than 100%	2	2,27%
N/A	5	5,68%

Q15. Has your company ever had to deal with accessibility rules in another Member State that are different from the ones in your country (main location of your company)?

Deal with accessibility rules in another Member State	Number of requested records	% (N=84)
1. Never	65	77.4%
2. Rarely	6	7.1%
3. Sometimes	6	7.1%
4. Often	3	3.6%
5. Very Often	4	4.8%

Q16. Please rate the importance of the following actual or potential obstacles to the provision of accessible goods and services? [1–Not important, 2, 3, 4, 5, 6-Very important]

Actual or potential obstacles to the provision of accessible goods and services	Average score	N	Standard deviation
Lack of knowledge about accessibility	3,7	87	1,51
Lack of knowledge about the size of the necessary investments	3,5	84	1,67
Lack of information / guidelines about accessibility	3,8	86	1,51
Lack of standards	3,2	84	1,58
Lack of legislation	3,2	84	1,48
Complexity of information /guidelines	3,5	83	1,36
Complexity of standards	3,6	83	1,33
Complexity of legislation	3,7	84	1,44
Diverging accessibility requirements within countries and between EU Member States	3,2	71	1,74
Size of the demand for accessible goods and services	3,6	83	1,62
Customers willingness to pay extra for accessibility features	3,4	87	1,62
Established strong position of some competitors in the market	3,2	83	1,73
Uncertainty of short term results of the necessary investments	3,1	87	1,44
Other	2,5	22	1,71

Q17. If your company does NOT provide accessible goods and services, or if you don't know if it does, please rate the importance of the following factors that may cause costs to your company if you were to provide accessible goods and services. [1–Not important, 2, 3, 4, 5, 6-Very important]

Factors that may cause costs to your company if you were to provide accessible goods and services	Average score	N	Standard deviation
Additional time/costs necessary to study the market/estimate the necessary investments	3,8	88	1,61
Time spent understanding requirements/ standards/ legislation in your own Member State	4,2	88	1,40
Time spent understanding requirements/ standards/ legislation in other Member States when trading cross-border	3,7	86	1,59
Additional costs incurred for design of products or services	3,7	87	1,62
Additional manufacturing costs (materials, machines etc.)	3,6	88	1,67
Additional costs for marketing and advertising in your country	3,1	86	1,53
Additional costs for marketing and advertising when trading cross-border	2,9	84	1,54
Additional costs in the delivery of goods and services (to vendors or customers)	3,3	85	1,37
Training staff about accessibility	3,5	87	1,49
Training staff about diverse accessibility requirements including legislation in other Member States	3,3	86	1,59
Getting legal expertise on accessibility legislation when trading in other Member States	3,4	86	1,63
Other	1,4	11	1,21

Q18. To what extent do you agree with the following statements. [1–Totally desagree, 2, 3, 4, 5, 6-Totally agree]

Statements	Average score	N	Standard deviation
For my company the group of persons with disabilities and older persons offer an interesting market potential.	3,6	164	1,77
My company would be able to sell more goods and services to persons with disabilities and older persons if these would be more accessible for them.	3,0	159	1,71
Common rules with regards to accessibility requirements make it easier for companies to sell to public authorities in other Member States.	3,6	154	1,79
For my company having common rules in Europe on accessibility will make it easier to operate in another Member State.	3,5	149	1,90
It is profitable for my company to invest in accessible goods and services as there is a reasonable level of demand and customers are willing to pay.	3,5	160	1,72

Crosstabulation Q18. To what extent do you agree with the following statements * Q8-Provision of accessible goods

Q18. To what extent do you agree	Q8-Provision of accessible goods						
with the following statements:	Yes	No	Don't know	N/A	Total		
For my company the group of persons with disabilities and older persons offer an interesting market potential.	4,3	2,8	3,3	4,1	3,6		
Common rules with regards to accessibility requirements make it easier for companies to sell to public authorities in other Member States.	3,8	3,6	3,3	3,7	3,6		
It is profitable for my company to invest in accessible goods and services as there is a reasonable level of demand and customers are willing to pay.	4,0	2,9	3,1	4,0	3,5		
For my company having common rules in Europe on accessibility will make it easier to operate in another Member State.	3,8	3,3	3,0	3,9	3,5		
My company would be able to sell more goods and services to persons with disabilities and older persons if these would be more accessible for them.	3,4	2,4	2,8	3,4	3,0		

Q19. Please indicate for each of the following potential EU measures how useful they would be to encourage your company to produce (more) accessible goods and services? [1–Not important, 2, 3, 4, 5, 6-Very important]

Potential EU measures	Average score	N	Standard deviation
Common EU standards setting out accessibility			
requirements, instead of letting each Member State	4,5	170	1,53
have national rules on accessibility			
EU support to self-regulation by the industry	4,0	165	1,46
Adoption of EU legislation to make the purchasing of			
accessible goods and services compulsory in public	4,1	165	1,70
procurement.			
Adoption of EU Rules containing general obligations			
for manufacturers and service providers to provide	4,0	165	1,49
accessible goods and services.			
EU subsidies (e.g. tax incentives, R&D grants etc.).	4,8	170	1,45
EU funding of a training programme for the industry			
on how to implement and monitor accessibility	4,5	169	1,50
requirements.	•		•
Other.	3,4	22	2,24

Annex B - Questionnaire

Accessibility and your company:

1.	In what c	country is your company locate	ed?	
2.	Does you	ur company operate in any oth	er c	ountries? [multiple choice]
	Bulç Cyp Cze Der Esto Finl Frai Ger	gium garia orus och Republic omark onia and oce omany ece ogary and		Latvia Lithuania Luxembourg Malta Netherlands Poland Portugal Romania Slovakia Slovenia Spain Sweden United Kingdom Other, please specify:
3.	M73.2 - http://ec	Market research and public op	inior nenc	mic sector)? Please indicate a NACE code (e.g. n polling. You can check your NACE code at: clatures/index.cfm?TargetUrl=LST_NOM_DTL&St_N&IntPcKey=&StrLayoutCode=HIERARCHIC)
4.		indicate the total number of em r the latest year available): Micro (1-9) Small (10-49) Medium-sized (50-249) Large (more than 250)	ploy	ees in your company, all locations together, in
5.	a) Does	your company import product	s/se	rvices across EU borders? [single answer]
		Yes, within the EU.		
		Yes, outside the EU.		
		Both.		

	b) Does	your company ex	port products/se	ervices a	across El	J borders? [sin	gle answer]			
		Yes, within the E	U.							
	□ Yes, outside the EU.									
		 								
		No, my company	does not expor	t produc	ts across	s borders.				
6.	Do you	sell to public autho	orities?							
		No.								
		Yes. If so, are actender specificat		rements	for good	ls and services	included in the			
		5. Very Often	4. Often	3 Some		2. Rarely	1. Never			
				Some	unies					
Ac	cessibili	ty and your comp	oany:							
7.	Were yo	ou familiar with the	concept of acce	essibility	as outlin	ed in the introd	luction before			
	reading	the survey?								
		Yes								
		No								
8.	Do you	provide accessible	goods and serv	ices?						
		Yes (go to question	on 9)							
		No (go to question	า 17)							
		Don't know (go to	question 17)							
9.		oods and/or service		mpany p	orovide?	Tick with an "x"	the categories of			
					Please tick	Please spec goods and provide:	ify which types of I services you			
	Informa	tion and Communi	ication goods in	cluding						
	Informa	tion and Com g technology	imunication se	ervices						
	Transpo	ort goods								

□ No, my company does not import products across borders.

Transport services	
Built environment goods	
Built environment services	
Other goods (please specify)	
Other services (please specify)	

10. What are the reasons for your company to provide accessible goods and services? [multiple choice]

		6 - Very importan t	5	4	3	2	1 - Not importa
(a)	It is profitable						
(b)	Corporate Social Responsibility / corporate image						
(c)	Compliance with legislation						
(d)	Accessibility features are a good way of reaching more customers						
(e)	Accessibility features actually do not add significant amounts to production costs						
(f)	Accessible goods and services allow participating in additional public procurement tenders						
(g)	Other (please specify):						

11. Please rate the importance of the following factors that may cause costs to your company when providing accessible goods and services. [multiple choice]

		6 - Very importan t	4	3	2	1 - Not importa nt
(a)	Time spent understanding requirements/ standards/ legislation in your own Member State					
(b)	Time spent understanding requirements/ standards/ legislation in other Member States when trading cross-border					
(c)	Additional costs incurred for design of					

	goods or services			
(d)	Additional manufacturing costs (materials, machines etc.)			
(e)	Additional costs for marketing and advertising in your country			
(f)	Additional costs for marketing and advertising when trading cross-border			
(g)	Additional costs in the delivery of goods and services (to vendors or customers)			
(h)	Training staff about accessibility			
(i)	Training staff about diverse accessibility requirements including legislation in other Member States			
(j)	Getting legal expertise on accessibility legislation when trading in other Member States			
(k)	Other (please specify):			

12. Has your company ever experienced a significant increase in the number of customers as a result of improving the accessibility of your goods and services?

5. Yes, very significant	4.	3.	2.	1. No, never

13. Has your company ever experienced a significant increase in the financial benefits (e.g. increased turnover, profit margin, etc.) as a result of improving the accessibility of your goods and services?

5. Yes, very significant	4.	3.	2.	1. No, never

14. Please estimate:

a) The proportion of accessible goods and services currently provided by your company as part of its total offer. Please provide the estimate in %.

0%	1- 10%	11- 20%	21- 30%	31- 40%	41- 50%	51- 60%	61- 70%	71- 80%	81- 90%	91- 100%	
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b) The proportion of your total revenues that relates to goods and services which are accessible for disabled persons. Please provide the estimate in %.

0% 10	1- 11-	21-	31-	41-	51-	61-	71-	81-	91-
	0% 20%	30%	40%	50%	60%	70%	80%	90%	100%

c) The extra production costs directly attributable to the provision of goods and services that are accessible (versus providing non-accessible goods and services). Please provide the estimate in %.

0%		11- 20% 21- 30%	31- 40%	41- 50%	51- 60%	61- 70%	71- 80%	81- 90%	91- 100%	More than 100%	
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15. Has your company ever had to deal with accessibility rules in another Member State that are different from the ones in your country (main location of your company)?

5. Yes, very often	4.	3.	2.	1. No, never

If you ticked 3., 4. or 5., please describe your experience. Would you evaluate the current legal framework as facilitating or impeding the provision of accessible goods and services in another Member State?

16. Please rate the importance of the following actual or potential **obstacles** to the provision of accessible goods and services? [multiple choice]

		6 - Very importan t	5	4	3	2	1 - Not importa nt
(a)	Lack of knowledge about accessibility						
(b)	Lack of knowledge about the size of the necessary investments						
(c)	Lack of information / guidelines about accessibility						
(d)	Lack of standards						
(e)	Lack of legislation						
(f)	Complexity of information /guidelines						
(g)	Complexity of standards						
(h)	Complexity of legislation						
(i)	Diverging accessibility requirements within countries and between EU Member States						
(j)	Size of the demand for accessible goods and services						
(k)	Customers willingness to pay extra for accessibility features						
(I)	Established strong position of some competitors in the market						
(m)	Uncertainty of short term results of the necessary investments						
(n)	Other (please specify):						

If your company provides accessible goods and /or services, please move to question 18.

17. If your company does NOT provide accessible goods and services, or if you don't know if it does, please rate the importance of the following factors that may cause costs to your company if you were to provide accessible goods and services.

		6 - Very importan t	4	3	2	1 – Not importa nt
(a)	Additional time/costs necessary to study the market/estimate the necessary investments					
(b)	Time spent understanding requirements/ standards/ legislation in your own Member State					
(c)	Time spent understanding requirements/ standards/ legislation in other Member States when trading cross-border					
(d)	Additional costs incurred for design of products or services					
(e)	Additional manufacturing costs (materials, machines etc.)					
(f)	Additional costs for marketing and advertising in your country					
(g)	Additional costs for marketing and advertising when trading cross-border					
(h)	Additional costs in the delivery of goods and services (to vendors or customers)					
(i)	Training staff about accessibility					
(j)	Training staff about diverse accessibility requirements including legislation in other Member States					
(k)	Getting legal expertise on accessibility legislation when trading in other Member States					
(I)	Other (please specify):					

18. To what extent do you agree with the following statements:

		6 - Totally agree	5	4	3	2	1 - Totally disagree
(a)	For my company the group of persons with disabilities and older persons offer an interesting market potential.						
(b)	My company would be able to sell more goods and services to persons with disabilities and older persons if these would be more accessible for them.						
(c)	Common rules with regards to accessibility requirements make it easier for companies to sell to public authorities in other Member States.						

(d)	For my company having common rules in Europe on accessibility will make it easier to operate in another Member State.			
(e)	It is profitable for my company to invest in accessible goods and services as there is a reasonable level of demand and customers are willing to pay.			

A European Accessibility Act – your opinion on possible solutions

19. Please indicate for each of the following potential EU measures how useful they would be to encourage your company to produce (more) accessible goods and services?

		6 – Very useful	5	4	3	2	1 -Not useful at all
(a)	Common EU standards setting out accessibility requirements, instead of letting each Member State have national rules on accessibility						
(b)	EU support to self-regulation by the industry						
(c)	Adoption of EU legislation to make the purchasing of accessible goods and services compulsory in public procurement						
(d)	Adoption of EU Rules containing general obligations for manufacturers and service providers to provide accessible goods and services						
(e)	EU subsidies (e.g. tax incentives, R&D grants etc.)						
(f)	EU funding of a training programme for the industry on how to implement and monitor accessibility requirements						
(g)	Other (please specify in the box hereunder)						

Ple	ease indicate why your most preferred measure would be good for your company:
20.	Please provide any additional comments regarding (barriers to) the provision of accessible goods and services (costs, benefits, barriers, opportunities, etc.).
	Thank you for participating in this survey.

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