



Updated ANEC Policy Statement on Design for All

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Executive Summary

- In 2003, the European Year of People with Disabilities, ANEC issued a Policy Statement on Design for All which urged implementation of CEN/CENELEC Guide 6 “*Guidelines for standard developers to address the needs of older persons and persons with disabilities*” in the drafting of European Standards.¹
- ANEC believed the implementation of Guide 6 would serve as a yardstick for measuring the extent to which modern standards meet the needs of European consumers and citizens
- In 2006, no more than 3 of the 275 active CEN Technical Committees reported that Guide 6 was used in their standards development work².
- 2007, European Year of Equal Opportunities for All, has seen the European Commission sign and commit to the UN Convention on the Rights of Persons with Disabilities.
- Noting the very low use of Guide 6, ANEC believes that Technical Committees should now be required to take into account the needs of older people and people with disabilities in the development of European Standards.
- ANEC asks the European Standards Bodies and the European Commission to take an initiative aimed at providing Technical Committees with the specialist knowledge needed to meet the requirements of older and disabled people.
- ANEC believes a dedicated expert should be engaged to advice on needs of older and disabled people in the development of European Standards along the lines of the well-established model of the CEN/CENELEC Consultant.

ANEC in brief

ANEC is the European consumer voice in standardisation, representing and defending consumer interests in the processes of standardisation and certification, and in policy and legislation related to standardisation. Our aim is a high level of consumer protection. Since 1995, we have represented consumer organisations from the European Union Member States and EFTA countries. The European Commission and EFTA Secretariat fund ANEC, while national consumer organisations contribute in kind. The ANEC Secretariat is based in Brussels (www.anec.eu).

¹ ANEC2003/DFA/027, June 2003.

² Results of CEN 2006 Questionnaire on the use of Guide 6, CEN BT N7671.

ANEC Policy Statement on Design for All in 2003

In 2003, the European Year of People with Disabilities, ANEC issued a Policy Statement on Design for All which urged implementation of CEN/CENELEC Guide 6 in the drafting of European Standards³.

The purpose of ANEC's statement was to contribute to the development of standards able to ensure safe access to products and services for as many consumers as possible. Discrimination exists if older people and people with disabilities cannot use mainstream consumer products and services.

ANEC said that implementation of Guide 6 would serve as a yardstick for measuring the extent to which modern standards can meet the needs of European consumers and citizens.

Background on CEN/CENELEC Guide 6

In 1999, the European Commission highlighted the importance of Inclusion and Design for All principles in standardisation by launching Mandate 283 on the safety and usability of products for older and disabled people.

In 2001, ISO and IEC developed Guide 71 to provide guidance to standards writers on how to accommodate the needs of older people and people with disabilities. To comply with Mandate 283, CEN and CENELEC decided to adopt ISO/IEC Guide 71 as a European publication. As a result, CEN/CENELEC Guide 6 was published in 2002. Hence ISO/IEC Guide 71 and CEN/CENELEC Guide 6 are identical documents.

ANEC helped to draft both ISO/IEC Guide 71 and Mandate 283. The latter required the setting up of a mechanism to ensure that the Guide was used and improved, and that existing standards were reviewed and amended in line with its guidance.

Implementation of CEN/CENELEC Guide 6

The proposal for the adoption of an implementation mechanism was accepted by the Technical Committee Management Group (TCMG) of the CEN Technical Board at its meeting on 14 December 2004⁴. The mechanism essentially consisted of a letter sent to the chairpersons of CEN technical bodies encouraging them to take into account the needs of older and disabled people. The mechanism also required a reference be made in the foreword to those standards where aspects regarding the needs of older people and people with disabilities had been addressed. The responsibility was placed on the technical bodies developing the standards and the CEN Management Centre was to initiate a review of the mechanism before the end of 2006.

³ ANEC2003/DFA/027, June 2003.

⁴ BT 58/2004

In May 2005, the CEN Technical Board (CEN/BT) adopted a further resolution aimed at providing CEN technical bodies with the tools to address the needs of older people and the disabled in the development of standards. The Resolution, taken on 26 May 2005, followed recommendations from the CEN/BT Working Groups 113 'Safety and usability of products by people with special needs' and 157 'Accessibility for All'⁵.

In June 2005, following a request from ANEC, CENELEC TC 61 "Safety of Household appliances" set up Working Group 4 to review the multiple Parts 2 of EN 60335, taking into account the use of the appliances by children and vulnerable people. Despite the ANEC contributions, and the support given by the European Commission standardisation mandate of December 2006, the task for WG 4 in amending the Part 2 standards is regarded as very challenging by many WG 4 members who believe that specialist expertise is needed to help fulfill the task of the Working Group.

Review of implementation mechanism of CEN/CENELEC Guide 6 by CEN

During the summer of 2006, CEN sent out a questionnaire on the use of CEN/CENELEC Guide 6 to Technical Committees (CEN/TCs) in order to evaluate the implementation mechanism for CEN/CENELEC Guide 6.

The collated responses, circulated to the CEN/BT members in October 2006, showed feedback from around 40 CEN/TCs (out of a total of 275 CEN/TCs). CEN/CENELEC Guide 6 was considered irrelevant by most CEN/TCs and no more than 3 CEN/TCs said the Guide was used in their work. Although there is not yet sufficient experience in consumer relevant CEN/TCs on the implementation of CEN/CENELEC Guide 6, the mechanism to stimulate its use was considered 'useful' by just 5 respondents⁶.

The CEN/BT noted the questionnaire results but has not discussed the matter further.

Two examples of the use of CEN/CENELEC Guide 6 in CEN are from May 2006, when CEN/TC 136 'Sports, Playground and Other Recreational Equipment' decided to create a Working Group to draft standards for barrier-free playground equipment and from November 2006, when CEN/TC 261 'Packaging' decided to establish a new Working Group to develop standards on accessible packaging. Beginning 2007, CEN TC 122 "Ergonomics" set up a specific mechanism to deal with the implementation of Guide 6 by its WGs.

However, ANEC is alarmed at the lack of evidence to show that incorporation of the needs of older and disabled people is taking place in the development of standards systematically and at the limited success of the CEN implementation mechanism.

⁵ BT C20/2005

⁶ CEN BT N7671

ANEC Policy Statement on Design for All in 2007

2007 is the European Year of Equal Opportunities for All and has seen the European Commission commit to the UN Convention on the Rights of Persons with Disabilities. This commitment must be followed through into European standardisation.

ANEC asks the European Standards Bodies and the European Commission to take an initiative aimed at providing Technical Committees with the specialist knowledge needed to meet the requirements of older and disabled people.

Eight years after the publication of Mandate 283, and five years since the adoption of CEN/CENELEC Guide 6, ANEC believes European standards must now be required to reflect the needs of older people and people with disabilities⁷.

Europeans reaching the age of 65 in 2050 can expect to live on average between four and five years longer than those reaching 65 today. There will be a spectacular increase in the number of people surviving to the ages of 80 and 90, leading to many of them spending several decades in retirement and reaching an age where infirmity and disability are more prevalent⁸. And they constitute an important market share with an unequal share of disposable incomes.

50 million disabled citizens, representing more than 10% of the EU population, also have the right to become equal citizens in the European Society⁹.

91% of European citizens agree to spend more money in eliminating physical barriers for people with disabilities¹⁰. This overwhelming support is important when considering the relation between disability and ageing and planning the actions to cope with the demographic trends.

Public procurement, representing 16.3% of Community GDP in 2006, is an important sector of the European economy. The harmonisation of procedures for concluding contracts is a major achievement of the Internal Market. According to the Public Procurement Directives, accessibility requirements can be integrated in the technical specifications of contract documentation for public bids¹¹. The role of European Standards in defining accessibility requirements in public procurement contracts provides a vital opportunity for mainstreaming accessibility.

Noting the failure of CEN implementation mechanism for Guide 6 and the inherent weakness of the European standards system in addressing other horizontal issues (such as environmental requirements¹²), ANEC believes actions must be taken to ensure the development of European Standards that can serve societal needs. This

⁷ Results of CEN 2006 Questionnaire on the use of Guide 6, CEN BT N7671.

⁸ European Commission, The demographic future of Europe – from challenge to opportunity, 2006

⁹ <http://www.edf-feph.org/en/welcome.htm>

¹⁰ Euro barometer "Discrimination in the European Union" 2007 on disability matters

¹¹ Directive 2004/18/EC of 31 March 2004 on the coordination of procedures for the award of public works contracts, public supply contracts and public service contracts, OJ L 134/114 of 30 April 2004.

¹² ANEC-ENV-2006-G-022rev

is essential if European Standards are used to complement European legislation for policy objectives beyond the dismantling of trade barriers between countries.

ANEC believes a dedicated expert should be engaged to advise on needs of older and disabled people in the development of European Standards along the lines of the well-established model of the 'CEN/CENELEC Consultant'¹³. He or she could be supported in the task by a small panel of experts whose collective knowledge would encompass the needs of older people and people with disabilities.

The Consultant would monitor proposals for new European Standards made to CEN, their active work programmes and European Standards submitted for review or revision. He or she would advise the Technical Committees on the actions needed to meet political or societal requirements arising from Design for All and help the Technical Committees achieve those requirements. Bearing in mind the scope of the task, the panel of experts would assist the Consultant define priorities.

Although respecting the principle for a Technical Committee to be responsible for the content of European Standards within its scope, the Consultant would have the right to ask the Technical Board of CEN to review cases where he or she believed a Technical Committee had not accommodated Design for All needs.

ANEC concludes its updated policy statement by urging recognition by the European standards bodies, the European Commission and EFTA of the fundamental need to ensure that all people in society are able to derive benefit from the products and services on the European market.

Access to mainstream products and services, as well as to the built environment, is a prerequisite for an inclusive society. European Standards, if based on the principles of Design for all and used, can play an essential role in making Europe accessible.

¹³ See <http://www.cen.eu/boss/organization/profiles+-+index/cen+consultant/index.asp>