



The voice of blind and partially sighted people in Europe

Fact Sheet for Trilogue Negotiations on EAA

April 2018

In February 2018, the European Blind Union published its position on the Trilogue negotiations for a European Accessibility Act (EAA, [download](#)).

This fact sheet contextualises our demands for the EAA, so that the Directive's impact on accessible goods and services enables ample societal participation of 30 million blind and partially sighted Europeans.

Inclusive Scope with Horizontal Purpose

EBU demands a truly horizontal EAA that creates legal certainty for producers and consumers across multiple economic sectors.

Accessibility of Urban Transport – Article 1, Paragraph 2(c)

- 40% of trips to work are undertaken by public transport. [\[Source\]](#)
- 74.5% of Berliners with disabilities use public transport multiple times a week. 27.6% assess its accessibility favourably. [\[Source\]](#)
- 100% of the Berlin bus fleet violate the two-senses principle, by only providing visual information on the outside of the bus. [\[Source\]](#)
- The Americans with Disabilities Act has propelled large cities such as Boston to achieve a 100% fully accessible bus fleet. [\[Source\]](#)

The EAA has the potential to spur a similar success story in Europe, empowering participation in the labour market and social activities.

Accessibility of Tourism Services – Annex I, Section VIIIa

- In 2014, tourists spent 2.68 billion nights in European hotels, creating an annual turnover of €144bn. [\[Source\]](#)
- Travellers with disabilities generated a direct turnover of €2.5bn for accessible tourism in Germany alone. [\[Source\]](#)
- 37% of potential clients have decided to not travel due to limited accessibility. If improved, half of those would travel more. [\[Source\]](#)
- According to an independent study, 70% of persons demanding accessibility have the financial and physical capabilities to travel, generating potential revenues of €88.6bn by 2025. [\[Source\]](#)



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- According to an EU-funded study, accessible tourism is projected to increase the tourism economy in Europe by up to 36%. [\[Source\]](#)

EAA allows an essential economic branch to benefit from the customer base of blind and partially sighted tourists, particularly elderly tourists.

Accessibility in Public Procurement – Article 1, Paragraph 3

- Public procurement accounts for 16% of Europe’s GDP. [\[Source\]](#)
- 55% of procurement procedures are decided on basis of the lowest price, disregarding socially more advantageous tenders. [\[Source\]](#)
- Two out of three SMEs are favourable to binding rules on accessibility in public tenders. [\[Source\]](#)
- Large companies such as Amazon, Bosch or Toshiba advocate for an inclusion of public procurement in the EAA. [\[Source\]](#)
- The procurement of suburban carriages in Berlin drew criticism for not considering accessibility norms during the tender. [\[Source\]](#)

EAA unites the demands of enterprises of all sizes as well as customers to advance accessibility through transformative procurement practices.

Comprehensive and Comprehensible Annexes

EBU demands further amendments to the annexes so as to maximise their usefulness for the subsequent work of standardisation bodies.

Accessibility of Digital Infrastructure - Annex I, Section V, Part B-C

- In 2017, purchasing power of Britons with disabilities stood at €286.0bn, according to the British government. [\[Source\]](#)
- 71% of customers with access needs will click away from a website that they find difficult to use and 82% would spend more if websites were more accessible. [\[Source\]](#)
- Per month, German rail operator *Deutsche Bahn* sells 3.5mil online tickets, creating an annual digital turnover of €2.5bn. [\[Source\]](#)

The EAA facilitates European businesses to tap into the large digital customer base of 30 million blind and partially sighted Europeans.



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Binding Requirements on Built Environment

EBU unequivocally demands binding clauses and clear specifications on built environment, without which the Act fails its purpose and potential.

Accessibility of Public Stations – Article 1, Paragraph 2(c)(iii)

- In London, 71 out of 270 stations are partly accessible, but 50 of those require manual help at the station. [\[Source\]](#)
- In Paris, a mere 3% of metro stations are fully accessible, all of them located on the same single metro line. [\[Source\]](#)
- In Barcelona, a leading example of accessible public transport in Europe, 17.3% of subway stations remain inaccessible. [\[Source\]](#)
- Following the Americans with Disabilities Act, the metros of Washington and Los Angeles became 100% accessible. [\[Source\]](#)

The EAA cannot exclude the built environment of stations, effectively excluding persons with disabilities from using accessible public transport.

Accessibility of other Buildings – Article 3, Paragraph 10

- According to the German government, implementing accessibility increases the cost of new large-scale projects by 0.5%. [\[Source\]](#)
- Projects with an overall construction cost of less than €3 million see an average increase in costs between 1.5% to 4%. [\[Source\]](#)
- According to the UN, refurbishments towards full accessibility are accounted for with up to 3.5% of the costs. [\[Source\]](#)
- An independent policy brief calculates that the one-time cost of providing full accessibility to three people in social housing (€1,590) corresponds to the cost of spending two days in a public hospital single room (€1,565). [\[Source\]](#)

The EAA facilitates participation of 80 million Europeans with disabilities in daily life without causing disproportionate costs to producers.

Minimal Exemptions and Restrictions

EBU demands a minimisation of exemptions and restrictions for burdensome application so as to not subvert the potential of the EAA.



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No Rules on Parallel Usage – Article 12, Paragraph 7

- 500 automatic ticketing terminals are spread over 166 suburban rail stations in Berlin with clusters in inner-city stations. [Source]
- There are 38 individual ATMs at London Heathrow Airport, spread over four terminals of almost 600,000m². [Source]
- There are 26 ATMs at Madrid Barajas Airport, 12 of those are located in one terminal of 760,000m². [Source]

The EAA cannot expect a blind traveller to independently identify the one single accessible ATM in a space the size of up to 106 football fields.

No Extension of Transition Phase – Article 27a, Paragraphs 1-2

- The life span of a credit card terminal is 11.4 years. [Source] ATMs have an average life span of up to 12 years. [Source]
- Without sound or tactile output, touch screens are not accessible to blind customers. [Source] Resistive touch screens offer 75% screen clarity, inhibiting access by partially sighted users. [Source]
- With the proposed additional transition period of 6 years, full accessibility would come to Europe later than the year 2036.

The EAA cannot let 30 million blind and partially sighted European users of service terminals wait up to two decades more for full accessibility.

No Exception for Microenterprises - Article 1a

- 92.8% of all enterprises in Europe are microenterprises. [Source]
- In 2014, there were 150,791 people employed by 29,123 enterprises in book publishing EU-wide. [Source]
- This gives an average of 5.2 employees, rendering most publishers microenterprises in the sense of the EU's definition. [Source]
- Microenterprises are “very substantial” in creative industries. [Source] This is especially the case for e-books, which account for 11.5% of the UK market. [Source] Many publishers prevent text-to-speech conversion of their e-books for blind readers. [Source]

The EAA cannot exclude 93% of Europe's single market from its scope, particularly regarding access to culture and information for all patrons.



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Further Reading

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