



Position Paper

ANEC comments on AFNOR feasibility study on accessibility to tourism and transport services to disabled people

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1. Executive summary

In 2007-08 AFNOR carried out a feasibility study on the accessibility of tourism and transport services within the framework of Second Programming Mandate M/371 addressed to CEN by the European Commission. The final report “Feasibility and opportunity to develop a standardisation work programme concerning criteria for accessibility to tourism and transport services for disabled people”¹ was published in May 2009.

Considering the increasing mobility of European consumers, as well as Europe’s ageing population, ANEC considers the safety, quality and accessibility of tourism and transport services as one of the current priorities for consumers and, as such, welcomes the AFNOR feasibility study in this field.

Despite the UN Convention on the Rights of Persons with Disabilities², which all EU Member States have signed, a large number of persons with disabilities are still facing problems in accessing services in the tourism and transport field. Whilst the rights of persons with disabilities in the *transport sector* are already partly addressed in recent EU legislation, such as Regulation 1107/2006 on the rights of persons with disabilities when travelling by air, and the two proposals for Regulations on rights of maritime and coach passengers, the EU has yet to offer adequate and equal rights to persons with disabilities in the area of tourism services (as distinct from transport).

As expressed at the final stakeholder seminar of this project³, ANEC considers that a European horizontal legislative framework should be established to cover the safety and quality of all services. Such a framework should apply also to more vulnerable consumers, such as children or older persons. This framework should be underpinned by formal standards.

Moreover, ANEC stresses the need for CEN to put in place an effective strategy to ensure the balanced involvement of all relevant stakeholder groups in the development of any standards in this field, and in particular to ensure the involvement of organisations representing disabled or older persons.

¹ <http://www.cen.eu/cenorm/sectors/business+development/value/project2accessibility.pdf>

² Article 9(1) states that “*To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.*”

³ Final stakeholder seminar held in Brussels on 13 February 2008.

2. Scope and definitions

The AFNOR study focuses mainly on the accessibility of tourism services, with the report stating that accessibility covers “the built environment, their immediate surroundings, and all the support services”. The report emphasises the need to ensure a continuous and seamless supply of these services to all consumers, from accessible travel bookings and accessible transport means, to accessibility of the hotel at the destination. However, the report specifies that the field of study at hand concerned exclusively the services part, not equipment or facility accessibility.

While the report appears to recognise the overlap between transport and tourism services, and the fact that these two are not only linked, but in many cases form a continuum, no clear definition or scope for either sector is offered.

Despite the obvious overlaps between the two sectors, ANEC considers it essential that the two fields are defined and considered separately, not least due to the different regulatory bases for the sectors. It is also important to underline that although the focus of this study is on tourism *services*, access to the built environment (e.g. hotels or restaurants) must be taken into account in any resulting work to ensure the consumer is offered a seamlessly accessible service from door to door. Furthermore, although tourism and transport are two separate fields, we believe that a more elaborate analysis and identification of the commonalities and overlaps is needed.

Considering the intangible nature and the broadness of the topic at hand, and thus the need to very clearly define the scope of any further work, ANEC supports the report’s recommendation on the development of terminology and classification standards in the area of tourism/transport services as a necessary prerequisite for any future initiatives. Any such work should take into account the existing standards, guidelines, regulations or other measures, such as those developed under ISO/TC 228 ‘Tourism and related services’ or its CEN equivalent CEN/TC 329 ‘Tourism Services’, as well as the concepts found in CEN/CENELEC Guide 6 ‘Guidelines for standards developers to address the needs of older persons and persons with disabilities’.

The classification standard could e.g. focus on the types of service areas within tourism and within transport⁴. In the case of transport, this classification should nonetheless take into account the need, in potential subsequent standards work, to ensure continuity of accessibility throughout the whole journey.

⁴ E.g. transport services could be divided by mode of transport

In setting the terminology and definitions, ANEC supports the EDF call for basing all standardisation initiatives on the so-called social model of disability⁵.

3. Recommendations from the study

General

Many of the recommendations made in the AFNOR study are very broad, such as the recommendations to the European Commission to set up campaigns to further inform professionals about standardisation and its effects of accessible services for all, and to inform the public on disability issues in favour of a more inclusive society. While ANEC supports these recommendations, we do not consider these to be specific to the fields of tourism and transport only, and would benefit all sectors.

Considering that tourism is one of the largest industries in the world, and considering that there are ca. 100 million persons with disabilities in Europe, it is important to draw attention to the fact that increasing the accessibility of tourism and transport services would not only benefit consumers, but also businesses. Offering accessible services can increase profitability regardless of the size of the service provider and give companies a competitive advantage, in particular in the tourism field in which accessible services is still regrettably the exception.

Standardisation programme

The AFNOR report highlights three possible axes for action:

1. Request the EU to come into play and encourage professionals to establish a "European, horizontal, disability-specific, anti-discrimination legislation"
2. Leave the creation of reference standards for each sector in the hands of the professional organizations
3. Propose a standardisation programme which allows the interested parties under an overall initiative based on consensus to develop shared rules respecting all the views

The report concludes that the solution appearing to encapsulate the most common view consists in realising one / several CEN Workshop Agreements. The report suggests three issues as most suitable for standardisation:

⁵ According to EDF, while the 'medical model' is based on persons' impairment or lack of ability, the social model shifts focus on to disability which is due to the surrounding barriers created by the society. The 'responsibility' is thus shifted away from the individual to the society.

1. Signs, symbols and labels
2. Terminology
3. Accessibility criteria

ANEC believes that formal standardisation can play a role in increasing consumer protection and rights in the field of accessible tourism and transport services. However, we consider the above-mentioned terminology and classification work a necessary *prerequisite* for any other standardisation in this field.

Should the terminology/classification work support the development of further standards, ANEC would in particular support the development of a European Standard on accessibility symbols/labels. However, we believe that such symbols or labels should not only be developed and applicable to tourism / transport services, but for all services.

Labels and symbols form a vital part of consumer communication and information at all stages of service provision and would help signal the availability or existence of accessible services in an easily identifiable and simple manner regardless of the country in question. Standardisation of these symbols would provide consumers with more clarity and confidence and could help increase transparency, provided that the use of the labels/symbols is subject to external third party verification/certification to avoid any misuse by less scrupulous service providers. It should be highlighted in this context that any symbols developed at the European level should necessarily take into account work done at the international level, in e.g. ISO/TC 145 'Graphical symbols' so as not to contradict or duplicate existing initiatives.

The report also puts forward a proposal by ENAT⁶ for the development of a CEN Workshop Agreement on '*Accessibility for people with disabilities to transport and tourism services*'. The proposal notes that this should provide a set of basic guidelines, including guidance on service facilities, service management, and staff training.

As mentioned above, ANEC considers that the accessibility of services is best ensured through European legislation which is underpinned by formal standards. While ANEC supports the finding that standardisation work on accessibility criteria would bring benefits to both consumers and businesses, we believe that such criteria should be set in European Standards rather than other, less formal, deliverables. It is also necessary to establish a clear scope for such a Standard.

Any standards in these fields should set requirements for the quality of the particular service in question, keeping accessibility as the common requirement in all the service

⁶ European Network for Accessible Tourism

elements to be addressed: safety, training and qualifications of staff, service delivery, complaints and redress systems, equipment/premises, information provision and contracts, after-sales services, sustainability and social responsibility, confidentiality and privacy issues.

Furthermore, should quality/safety standards be elaborated, ANEC supports the ENAT view that such work should also identify what constitutes good practice in the particular field.

Finally, ANEC would consider it useful to develop a standardised way to provide information on accessible services and facilities in the transport and tourism sectors. Of course, the information provision should be available in alternative formats so as to be accessible by all consumers, irrespective of their abilities (e.g. print format, on-line content, audio and video formats).

New CEN strategic group on accessibility

The AFNOR report recommends setting up a new CEN strategic group to pursue the debate on accessibility and standardisation. While ANEC fully supports the recommendation to address the strategic issue of accessibility in standardisation, the issue of whether this should be done in a new group or whether one of the existing group structures⁷ would be able to accommodate such a task, should be examined further so as to avoid any unnecessary overlaps or duplication of groups. Any group that may subsequently be established should have a clearly defined scope and aim, and should consist of a balanced representation of interests.

4. Ensuring stakeholder participation

ANEC stresses the need for CEN to put in place an effective strategy to ensure the balanced involvement of all relevant stakeholder groups in the development of any standards in the fields of transport and tourism services, and in particular to ensure not only the involvement of organisations representing disabled or older persons, but also of disabled persons directly.

⁷ While the CEN/CENELEC BT Working Group on 'Implementation of CEN/CLC Guide 6' or a sub-group thereof could potentially be considered as a possible forum, it should be noted that this group was set up for a specific task and that should the scope be broadened, it is of utmost importance that the participation of relevant experts is ensured



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APPENDIX – About ANEC and other documentation

About ANEC

ANEC is the European Consumer voice in standardisation, representing and defending consumer interests in standardisation and certification, and in policy and legislation related to standardisation. Our aim is a high level of consumer protection. ANEC was set up in 1995 as an international non-profit association under Belgian law. It represents consumer organisations from the European Union Member States and the European Free Trade Association (EFTA) countries. Our General Assembly is composed of one national member per country, nominated jointly by the national consumer organisations in their country.

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