

Brussels, 15 December 2009

Accessibility following the Design for All principles

In this paper Orgalime provides its views in response to the European Commission as set out in the draft standardisation mandate (04/11/2009) to CEN CENELEC and ETSI to include "Design for All" in relevant Standardisation initiatives.

Executive summary

Orgalime supports the idea that accessibility can be stimulated through raising company awareness with European guidelines on best practices for the inclusion of accessibility provisions in standards applicable to the design of engineering products where suitable.

*Orgalime believes that the development of standards and their use in product design should stay a business-driven process free from bureaucratic validation procedures. Therefore Orgalime calls on the European Commission to refrain from including in its mandate to the European standards organisations the drafting of a **"new standard that describes how the goods manufacturing industry in its processes can consider accessibility following Design for all principles"**(DfA) for two reasons:*

1. DfA principles could conflict with the "fit for purpose" principle and the "intended use" principle that apply to the safe design of products covered by existing directives;
2. Freedom of design and innovation capability are better ways to bridge adequately each "usability gap", instead of setting a one-size fits all approach in 'certifiable' standards.

Overall Comments

Special needs cannot be addressed by one size fits all solutions

People with disabilities and older persons are customers with special needs, whose growing number makes it attractive for manufacturers to meet their needs in their variety and particular conditions of use. As recalled in a recent position on "innovation management: a business choice" (25/09/2009), the capacity of companies to innovate in order to meet the needs of their customers should not be curtailed by pre-imposed process systems and bureaucratic certification measures. Standards are an important tool whose development and use in the process and product design induces costs. Therefore, standards should stay attractive and usable by designers in companies, especially SMEs, with due consideration for the already complex legislative framework which applies for placing all products safely on consumer or professional markets.

Orgalime, the European Engineering Industries Association, speaks for 34 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 22 European countries. The industry employs some 11.1 million people in the EU and in 2008 accounted for some €1,885 billion of annual output. The industry not only represents more than one quarter of the output of manufactured products but also a third of the manufactured exports of the European Union.

Safety for all before accessibility for all

The Design for All principle (DfA) could conflict with the principles of “fit for purpose” and of “intended use” that frequently apply to the safety aspects of the design of products covered by existing directives, such as the Low Voltage or Machinery directives. DfA could lead even to a poor mitigation of the hazards for the average users (e.g. some professional machines such as presses could not be triggered by single-handed users, in order to avoid that two-handed workers face the possibility of a severe work accident). Therefore design guidelines on accessibility following DfA should clarify how the needs and requirements of as many people as possible could be addressed along the existing European and national safety requirements applying at the work place, in public places and in private households;

Design for each need/use instead of design for all need/users

People with impairment and older people are a non-homogeneous user group.

1. The *usability* of a product is perceived very individually due to age, experience, training or type and degree of impairment. As there is a large variety of disabilities, some of them could be mutually exclusive in terms of ergonomics and performance of the product. Therefore there is a need to maintain some freedom of design in order to leave manufacturers bridge adequately each “usability gap”: a person with a visual impairment does not have the same requirements as a person suffering from a hearing disability;
2. Therefore DfA could lead to counterproductive results by reducing the range of choice for all users. Guidelines should clarify when the inclusion of DfA principles in product design would make the product usability reach its technical, economic or average user acceptance limit and should consequently be better addressed by resourcing to assistive technology and prosthetics;
3. If systematic recourse to DfA could be justified for products and installations used in public places, public services and activities, it is not suitable for private customers and users, including elderly or disabled people, who are expecting customised products that fit as closely as possible their very own needs, impairments and usability expectations.

Information for all: guidelines are more accessible than standards

Orgalime believes that Design-for-All principles are above all a matter of awareness-raising for which clarification of the concept of “All” or of “accessibility for All” is required.

The usability of engineering products, equipment and infrastructures is determined by their adequate installation, configuration and putting into service. Information of consumers, resellers, architects and providers of assistive technologies is required to enhance the adequate use by all of machines, equipment and infrastructures. Guidelines would be helpful in support to special briefing, training and instruction materials, where necessary.

Therefore, like for the inclusion of environmental aspects in standardisation, it is Orgalime industries strong belief that **accessibility following Design for all principles should remain voluntary guidelines for standards makers, engineers and designers. Such guidelines should not be turned into ‘certifiable’ standards.** While guidelines would be useful for assisting companies in their product design, especially SMEs, certifiable DfA standards would detrimentally impair their access to innovation funding, and public procurement contracts that would include reference to DfA principles. In this context an additional bureaucratic layer of conformity assessment against a DfA standard would only add costs to lawful manufacturers, while Member States have no means to ensure a level-playing field with the loads of containers of unsafe and otherwise non-compliant products that are placed everyday on the EU market.

+++ // END // +++

Adviser in charge: Philippe Portalier (email: Philippe.Portalier@Orgalime.org)

The European Engineering Industries Association

Orgalime aisbl | Diamant Building | Boulevard A Reyers 80 | B1030 | Brussels | Belgium
 Tel: +32 2 706 82 35 | Fax: +32 2 706 82 50 | e-mail: secretariat@orgalime.org
 Ass. Intern. A.R. 12.7.74 | VAT BE 414341438