



ONLINE DISPUTE RESOLUTION: WEB-SCRAPING OF EU TRADERS' WEBSITES

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Final Report

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Contact: Alessandra Sbordonì Alessandra.SBORDONI@ec.europa.eu

E-mail: Alessandra.SBORDONI@ec.europa.eu

*European Commission
B-1049 Brussels*

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Abstract

The study “Online Dispute Resolution: Web-Scraping of EU Traders’ Websites” examines the current state of compliance of online traders in the EU with the ODR Regulation, requiring online traders to make the link to the ODR platform and their e-mail address available on their website. For this study, a database of 19,580 EU online traders was developed and web-scraped. In addition, a mystery-shopping audit of 1,005 websites that include the ODR link was conducted to examine the ease with which the ODR-link and e-mail address is found by consumers on the traders’ websites.

In detail, this report is structured as follows:

- Background chapter on the legal background and purpose of the study
- Chapter dedicated to the methodology with which the database was constructed and the web-scraping and mystery shopping was performed
- Chapter dedicated to the composition of the database of 19,580 EU online traders
- Chapter presents the findings regarding the EU online traders’ compliance with the ODR Regulation, including both findings on the availability of the ODR link (web-scraping) and the accessibility of the ODR link (mystery shopping).

1 Introduction

The study “Online Dispute Resolution: Web-Scraping of EU Traders’ Websites” investigates to which degree EU online traders comply with the ODR Regulation by providing a link to the ODR platform on their website. This final report provides the findings of a web-scraping of 19,580 online traders and a mystery shopping audit of 1,005 online traders. This report is structured around the following chapters:

Chapter 1 presents the background of the current study and provides insights into the specifications of the ODR Regulation under investigation. Chapter 1 also includes the research objective and the resulting research questions, as well as an overview of the database developed as part of this assignment.

Chapter 2 discusses the methodology of the study and provides details about the inputs gathered to address the research questions.

Chapter 3 presents an overview of the composition of the database of 19,580 online traders in the EU, which have been tested on their compliance of the ODR Regulation.

Chapter 4 focuses on the study’s findings regarding the EU online traders’ compliance with the ODR Regulation. This chapter consists of two parts: 1) the findings regarding the availability of the ODR link on online traders’ websites and 2) the ease of accessing the ODR information on these websites.

The stand-alone **Executive Summary** provides a comprehensive short description of the research goal, approach and results of the study.

1.1 Background to the study

Digital technology has changed how we communicate, view the world and accomplish everyday tasks, and nowhere is this more the case than in consumption. The proportion of EU consumers using the internet increased from half to over three-quarters from 2004-2013, whilst over the same time period the proportion making a domestic online purchase increased from a fifth to almost half of the EU consumers. With the growing use of online solutions for consumers’ purchase activities, however, consumers have also been experiencing new forms of unfair commercial practices. In the past years, the EU has made policy and legislative efforts to make sure the European consumer is protected, also online.

In this respect, **Alternative Dispute Resolution (ADR)** is a way of resolving disputes between consumers and traders, without going to court. A neutral third party, i.e. the ADR entity, helps consumers find an out-of-court settlement. There are different types of ADR entities, such as mediators, arbitrators, ombudsmen, conciliators, consumer complaint boards.

Online Dispute Resolution (ODR) is ADR conducted through online means. Via an online platform, the ODR offers a single point of entry, which allows EU consumers and traders to settle their disputes for both domestic and cross-border online purchases. This is done through a four step-procedure: 1) a consumer fills in an online complaint

form and submits it, 2) the trader receives the complaint form and suggests (or not) an ADR entity¹ to the consumer, 3) the consumer and trader agree on the ADR entity, which automatically receives the dispute, and 4) the ADR entity handles the dispute online and reaches an outcome.

The availability of ADR/ODR is expected to strengthen national and cross-border consumer protection, to improve the functioning of the internal market and to encourage trade. Consumers will be able to shop in their country, in another EU country and over the internet with more confidence, knowing that they can access the ADR/ODR if something goes wrong. Businesses will also benefit, especially those that were previously at a competitive disadvantage because ADR was not available for resolving their disputes with consumers. A study on "*Misleading free trials and subscription traps for consumers in the EU*" conducted by GfK Belgium for CHAFAEA,² shows that 7% of the EU online consumers contacted an ADR party when facing a problem with a free trial or subscription, compared to 3% of them taking the matter to court. 70% of the consumers who brought the matter to an ADR considered this action easy, compared to 65% of the consumers who brought the matter to court.

In 2013 a legislative package was adopted on ADR/ODR that included the Directive 2013/11/EU on Consumer Alternative Dispute Resolution and Regulation (EU) No 524/2013 on Consumer Online Dispute Resolution (ODR).³ The **ODR Regulation** requires:

- 1) the Commission to establish an EU-wide ODR platform. This platform aims at facilitating the online resolution of contractual disputes between EU consumers and traders over purchases of goods and services made online, both domestically and across borders. It is interactive, multilingual and free-of-charge
- 2) Member States to establish national contact points to help consumers and traders with the use of the platform
- 3) online traders and marketplaces established in the EU to provide on their websites an electronic link to the ODR platform, which is easily accessible. In addition, online traders also have to state their e-mail address on their website to facilitate easy communication between all involved parties

Since the launch of the platform on 15 February 2016, over 47,000 consumer complaints have been registered, of which more than a third concerned cross-border

¹ National ADR entities notified by Member States to the Commission, according to the ADR Directive, are registered on the ODR platform. There are currently approx. 250 ADR entities from 24 Member States. Poland, Romania and Spain have not notified any ADR entity yet

² Study on Misleading « free » trials and subscription traps for consumers in the EU : <https://publications.europa.eu/en/publication-detail/-/publication/bf621260-9441-11e7-b92d-01aa75ed71a1/language-en/format-PDF>

³ Alternative and Online Dispute Resolution (ADR/ODR) : http://ec.europa.eu/consumers/solving_consumer_disputes/non-judicial_redress/adr-odr/index_en.ht

purchases within the EU. Most complaints were related to purchases of clothing and footwear, airline tickets and information and communication technology goods.⁴

1.2 Research objectives and research questions

In order to ensure the functioning of the platform, the Commission wants to monitor the functioning of the platform towards the end of 2017. As part of this effort, the current study investigates whether traders comply with their information obligations according to the ODR Regulation. Concretely, the objective of the current project is to investigate whether online traders and online marketplaces, established in the EU, provide a link to the ODR platform on their website.

Based on this objective, two main research questions were put together:

1. *What is the level of compliance of EU online traders to the information obligations foreseen in the ODR Regulation?*
2. *What is the profile of the traders that comply with the information obligations and of those that do not?*

1.3 Deliverables of the study

The current study resulted in two main deliverables. First, as part of this study, a database has been developed featuring 19,580 online traders established in the EU. The box below presents an overview of the information included in this database. Second, this final report provides insights into EU online traders' compliance with the ODR Regulation, by presenting the findings of the web-scraping and the mystery shopping.

Structure of the database:

- 1) *Trader name* (in the form of a domain name or subdomain name where applicable)
- 2) The *source* of the website (i.e., 'database 0', 'European Retail Index web shops' & 'SimilarWeb, Alexa, etc.')
- 3) *Trader primary sector*⁵
- 4) *Country* (and *Country2*) (country where the trader originates from; *Country2* bundles all non-EU traders into the group "International")
- 5) *Trader primary market* (country where the majority of traffic originates from)

⁴ European Commission Press Release : Buying online and solving disputes online: 24.000 consumers used new European platform in first year ; available via: http://europa.eu/rapid/press-release_IP-17-727_en.htm

⁵ See Annex 1 for a sector overview

- 6) *Engagement (web traffic)* (the average monthly website visits over the last 6 months⁶)
- 7) *% EU Traffic* (percentage of traffic originating from EU countries)
- 8) *EU Traffic* (the average monthly website visits over the last 6 months as a function the percentage of traffic originating from the EU)
- 9) *Pageviews* (the average monthly page visits over the last 6 months⁷)
- 10) *Domestic %* (percentage of web traffic from the country of origin)
- 11) *Cross-border %* (percentage of web traffic from other countries)
- 12) *Classification_size* (classification of traders into three equally sized groups of small, medium and large traders)
- 13) *Marketplace* (dummy variable indicating market places) – the current database includes 281 marketplaces
- 14) *ODR* (dummy variable indicating the websites that have an ODR link based on the findings of the web-scraping)
- 15) *E-mail* (dummy variable indicating websites that have an e-mail address based on the findings of the web-scraping)
- 16) *Mystery shopping* (dummy variable indicating the websites selected for the mystery shopping)
- 17) *Grading* (indicating easy, moderate and difficult to access ODR links for the 1,005 websites investigated in the mystery shopping audit)

⁶ 6 months between October 2016 and April 2017

⁷ Page visits differ from websites visits, as they record all pages a person visits on a website separately

2 Methodology

This chapter presents the methodology of this study, consisting of four tasks. First, a database of 19,580 online traders and marketplaces operating in a diverse range of goods and services throughout the EU was developed. The traders in this database were then categorised based on their primary location of operation, the product or service sector they are operating in and their size or market share. The development of this database is followed by a web-scraping exercise to identify the traders and marketplaces that do or do not comply with the ODR Regulation and the information obligations thereof. Finally, a mystery shopping audit evaluated the accessibility and user-friendliness of the ODR information and the provision of the appropriate contact information for a subset of the complying web shops. In the remainder of this chapter, a brief overview is given for each of these tasks.

2.1 Task 1: Identification of online traders and marketplaces

The first task of the study concerned the development of a database of websites of online traders active throughout the EU. This database aimed to include online traders and marketplaces that:

- engage in online sales of goods or provisions of services;
- are of different sizes (large-, medium- and small-sized traders);
- cover a wide range of goods and services sectors (including: clothing; shoes and accessories; travel services; electronics and computer hardware; books; online reservations of offline leisure; electrical household appliances; cosmetic and healthcare products; computer games and software; mobile telephone services; internet services; air transport; spares and accessories for vehicles; furnishings; electricity; payment services; and insurance);
- represent the top 100 online traders in terms of market share EU-wide; and
- represent the top 10 online traders in terms of market share in each EU Member State (excluding the ones that already form part of the top 100 EU-wide).

The development of this database required input from various sources. First, 8,930⁸ unique web shops were retrieved from an existing database of EU online traders that was created for the Commission for the project "*Mystery Shopping survey on territorial restrictions and geo-blocking in the European Digital Single Market*".⁹ The web shops in this database were then matched to additional traders that were identified through different sources. At first, only the top-ranked websites in each subcategory were included to identify traders that are large enough to be relevant in the given sectors

⁸ Originally, 9.296 unique web shops were retrieved from the Geo-blocking database

⁹ http://ec.europa.eu/consumers/consumer_evidence/market_studies/geo-blocking/index_en.htm

and countries. The scope was later broadened to include a sufficient number of online traders.

First, 2,009¹⁰ web shops have been added from the **European Retail Index**¹¹ database, which lists and provides business details of major traders in Europe. This database contains data on large traders in all EU28 countries (except for Malta) and identifies traders that are to some degree active in e-commerce. Traders from this database were only added if they provide an online e-commerce platform and a dedicated URL of the web shop (the URL may be the same as the general company website). Other traders, which were not explicitly defined as web shops, were manually checked using desk research (as described in chapter 2.1.2).

Furthermore, additional online traders have been identified through online traffic intelligence databases,¹² which provide website and application traffic. Using the region and sector/category filters provided by these databases helped to identify the top online traders in a given country within a specific sector. For the current project, the online traffic intelligence databases SimilarWeb and Amazon's Alexa have been used.

SimilarWeb¹³ provides access to the top 100 highest ranked websites based on both websites and mobile traffic (only through the browser, excluding mobile applications) from the majority of EU Member States with the exclusion of 7 countries with the smallest population¹⁴ across a wide range of product and service categories. Websites were downloaded from SimilarWeb for different categories (such as 'shopping', 'clothing and accessories' or 'consumer electronics'). To ensure that the top 100 web shops in terms of market share in the EU plus the additional top 10 web shops in terms of market share in each EU Member State were included, the top 100 websites per category per country were downloaded.

Amazon's Alexa traffic ranking database 'Top sites' was used to identify additional traders that fit within the scope of the study. Traders were identified by gathering all top ranked websites in the relevant subcategories per language. Alexa was particularly used for online traders in niche sectors, such as the insurance sector.

Finally, in addition to the use of databases, **desk research** was performed to increase the number of websites in the database. This was particularly necessary for smaller sectors, such as the financial sector and the insurance sector, where the inclusion of websites via databases was less efficient. In particular, for the insurance sector a non-

¹⁰ This number represents the final number of web shops from this source, after cleaning

¹¹ The European Retail Index is a database from the *Veraart Research Group*, which specializes in information on consumer markets. The information in the retail index is collected through a variety of sources, including company websites, trade magazines, credit information companies, chambers of commerce, newspapers, etc. The database is continuously updated based on both automated processes as well as manual input.

¹² *Online traffic intelligence databases* use a combination of clickstream data collected from online panels as well as various web crawling techniques and machine learning algorithms in order to estimate the number of visits and a multitude of other metrics, such as traffic sources, that help describe the online profile of websites and applications.

¹³ More information on SimilarWeb and its role in the current study can be found in Annex 2

¹⁴ These countries include Cyprus, Estonia, Latvia, Lithuania, Luxembourg, Malta and Slovenia.

exclusive list of insurance companies in EU Member States¹⁵ was researched in addition to insurance services pulled from the online databases.

All traders identified via SimilarWeb, Alexa and desk research were manually checked on three key conditions:

1) The website fits the definition of an online trader, meaning the website's primary activity is to sell goods or provide services to consumers. Web shops limited to selling second-hand goods and business-to-business transactions were excluded.

2) The trader's primary sector of operation is covered within the scope of the study. The web shops had to sell products and/or services in one of the 16 sectors specified by the ToR¹⁶ or in one of the additional sectors approved by the Commission. An overview of all sectors is presented in Annex 1.

3) The trader has a legal establishment in the EU. Researchers checked whether the websites originate from an EU country or had a legal establishment in the EU.

Over 19,000 websites identified via the traffic databases and desk research have gone through manual checks. A web script supported the researchers by searching the homepage of all the listed websites on words that are typically present in web shops, such as "pay", "basket", "shopping cart", "buy" etc. in all languages of the EU28 countries.

Additional quality checks have been undertaken and **duplicates** were filtered out by looking at cases where both the homepage and the web shop of a website were included in the website (e.g., *shop.adidas.de* and *adidas.de*). This resulted in 8,641 online traders that were added using information from SimilarWeb, Alexa and desk research. In addition, a web script was developed to test if all websites in the database are still working.

2.2 Task 2: Classification of online traders

After the database of online traders was collected, the online traders were classified according to their size, primary location and sector.

To define the online traders' **country** of establishment, multiple steps were taken. If available, country-specific top-level domains (TLDs), such as *.fr* or *.be* were used to allocate websites to a specific country. For general TLDs, such as *.com* or *.net*, SimilarWeb's top source data was checked, which indicates the country from which most traffic goes to a particular website. This is a strong proxy for a website's origin. For countries, where most of the web traffic did not originate from within the EU, individual checks were done to validate the origin of the website. Similarly, the

¹⁵ SNL Financial – European Insurance Coverage;
http://reality2.com/snl/snl_euro_site2012/images/European-Coverage-List-Insurance-June-2012-update.pdf

¹⁶ Clothing, shoes and accessories; travel services; electronics and computer hardware; books; online reservations of offline leisure; electrical household appliances; cosmetic and healthcare products; computer games and software; mobile telephone services; internet services; air transport; spares and accessories for vehicles; furnishings, electricity; payment services; and insurance.

country classification by TLD has also been crosschecked with the proportion of traffic coming from the respective country (for example the proportion of traffic coming from Belgium for a *.be* website). The accuracy of this approach has been demonstrated by a spot check of 100 websites that were classified by their TLD. 96 Websites were classified correctly, whereas three websites were European, but did not have their HQ in the country of which the TLD was used. One website was, however, not based in the EU (A website with a ".at" TLD seemed to have its HQ in Switzerland). Finally, additional manual checks have been done where inconsistencies could be found (e.g. websites with high number of cross-border traffic, not reflecting the website's TLD), for which the website's HQ location was searched. An overview of the country classification can be found in Annex 3.

The **sector** of the online traders was specified using the sector specifications provided by SimilarWeb and Alexa. These classifications have been crosschecked by manual checks with researchers visiting the websites and checking the sector classifications. Again, the sector definitions of the Geo-blocking project database and the European Retail Index were assumed correct.

To homogeneously classify online traders based on their **size**, website traffic data from the SimilarWeb database¹⁷ has been used to deal with the shortcomings of financial data. In many cases, concrete market share numbers are not available for a large number of online traders and when such information is available, it is often impossible to separate the financial performance information of traders that operate both offline and online (i.e. "bricks & clicks") to compare this information with traders that operate exclusively online (i.e. "clicks"). Using website traffic data resulted in the calculation of two relevant measures, namely 1) estimated EU traffic and 2) the proportion of domestic vs. cross-border EU traffic.

The proportion of the total average traffic for each website in database 1 (i.e. engagement, number of visits) coming from each of the EU28 member States was extracted from SimilarWeb. For each website, Similarweb provides the top 50 country traffic sources. For example, for a website with 80% traffic from Belgium and 20% from the USA, SimilarWeb will provide these two countries and the respective proportion of traffic they account for. In cases, where the countries responsible for a website's traffic exceed 50 different countries, not all country traffic sources are provided (only up to 50 countries). However, for most websites, the top 50 countries account for the vast majority of a website's traffic (0.65% is the highest percentage that was found for the 50th country of the top 50 sources). The percentage of traffic coming from EU countries was based on the available country traffic.

By adding all the proportions of traffic deriving from EU member states, the proportion of EU traffic (EU%) was calculated. By multiplying this percentage with the total web traffic of a website, an estimation of the total EU traffic for each website was calculated (hence, excluding any traffic from outside the EU). The website *evoxtech.com*, for example, has a total average traffic of 8,988 (i.e. Evoxtech.com had 8988 visits on average for a period of six months). SimilarWeb identified seven countries from which this total average traffic was coming from. Of these seven countries, five are EU member states and account for 98.5% of the total traffic on average. The two other countries, Iran and Switzerland, accounted for only 1.5% of the total traffic. The average proportion of total traffic deriving from EU member states (%EU Traffic, i.e. 98.5% in the case of Evoxtech.com) was multiplied with the total average traffic of a website (Engagement; i.e. 8,988 visits in the case of

¹⁷ More information on using SimilarWeb to extract traffic data is presented in Annex 2

Evotech.com) to arrive at average EU traffic (EU Traffic; 8853 visits in the case of *Evotech.com*).

For applying a unified approach for classifying online traders based on their size, the proportion of traffic deriving from EU28 Member States was calculated. Normally, website traffic is estimated as "total traffic" referring to all visits coming to a specific website, regardless of the region where the online visitors originate. However, based on the estimations on the proportion of traffic coming from the top 50 countries, the total traffic coming from the EU only, excluding other potentially relevant markets such as the United States, Russia and China was estimated. While this estimation was not necessary for local traders or even EU based traders, since most of their traffic is likely to originate from within the EU, it was quite relevant for large international traders for which Europe is one of several crucial markets (e.g. apple.com).

Websites were classified into *small*, *medium* and *large* traders, based on their EU web traffic.¹⁸ One limitation of using SimilarWeb is that for smaller websites, traffic data is often presented as '<5,000' or is sometimes missing. However, additional checks confirmed that the websites are working and the lack of traffic data is due to relatively limited traffic.

2.3 Task 3: Web-scraping

Using the database of online traders, a web-scraping exercise investigated which of the online trader complies with the information requirements of ODR Regulation by providing the link to the ODR platform on their website. The link to the ODR website could be a simple, electronic link to the platform¹⁹ or a web banner.

To investigate all included web shops, a web-scraping tool, consisting of a variety of scripts, was set up to screen all the websites of the traders/marketplaces. A first scan was done to test the accessibility of the web shops. This meant that a script simply tried to access every website, with different schemes (e.g. http or https) from the database and would return the outcome of this exercise (online or offline). This would make sure that we used the correct URL for every website, as sometimes a website could not be accessed on a certain scheme. The actual web-scraping tool initially downloaded the website's pages, which were then scanned for ODR links and e-mail addresses. As a first scan, only the pages one click away from the homepage were downloaded and scanned. When no ODR link was found, the websites were scraped and scanned again for a second time, now up to four clicks away from the homepage. In order to minimise the time needed to scan 20.000 websites, several virtual private servers (VPSs) were used, on which the web-scraping tool was deployed multiple time at once. This provided GfK with the extra advantages of having multiple IP-addresses available and not having to overload its own servers. Because the scripts were deployed via different VPSs, multiple scripts could run simultaneously, without bringing the exercise in jeopardy by being uncovered as "spammers" and overloading the websites' bandwidth. Each website was scraped by maximum one web-scrafer, on which a delay of 1 second was set between requests in order to minimise the load on the website.

¹⁸ See Table 5 and Annex 6 for the classification of online traders by different size

¹⁹ <http://ec.europa.eu/odr> or <https://ec.europa.eu/consumers/odr>

In order for the scripts to work simultaneously, a separate script also needed to be set up in order for the web-scraping scripts to know which website needed to be scraped next. Each time a web-scraping script was finished with a specific website, it sent a message to the server hosting the list of websites that it has finished scraping its website.

As a final check, in order to verify the absence of the ODR link, Google queries were used to search for an ODR link on websites. Whenever no ODR link was found on a website during the first web-scraping method, the website was forwarded to a separate list and was scraped again using google queries. As some websites don't allow web-scrapers, other than those from search engines, this method was used as an additional check. Google queries enabled scans with more advanced scrapers, which could cover more different files (e.g. Google found ODR links in certain Terms and Conditions PDFs, which were not found using the initial web-scraping exercise. This made the web-scraping exercise a bit more time consuming, but made sure the data was more accurate. Multiple VPSs were also employed for this task to increase the capacity and speed for this task.²⁰

In summary, the following tasks were performed:

- **Domain probe:** This task tested the working of a domain (i.e. website) with and without a www.-subdomain. It also checked if the server speaks "http" or "https".
- **Web-scraping:** The output of the *domain probe* resulted in 0 to 4 new tasks, which were the web-scraping tasks. Each web-scraping task was defined by a URL (i.e., http://www.domain.com) and a maximum level. The maximum level limited how deep the search went (deeper means slower and more workload). The starting level was gradually increased from one up to three levels, until a link was found. A second web-scraping was conducted on websites where no ODR link was found with the help of Google queries.
- **E-mail scraping:** The output of the *web-scraping* task resulted in zero or one e-mail scraping tasks, which searched for the existence of an e-mail address on the same pages that contained the ODR URL.²¹

These tasks were carried out using SQL Server, .NET for the central bits and Python and Linux for the actual web-scraping scripts. The key software used for the basis of the web-scraping scripts, however, was Wget.²² Wget is an open source programme, created for retrieving large files or completely mirroring websites. The main reason GfK used Wget for the given task at hand, was that Wget could pause and resume web-scraping tasks and supports a wide range of scripts in which it could be scripted.

As described above, the web-scraping also examines if an e-mail address is made available by the traders. The e-mail scraping was first limited to the same page as the ODR link, but the search was eventually widened, including all pages up to level four of the website. One shortcoming of this approach is that the e-mail scraping looks for

²⁰ One VPS (and, thus, one IP address) can only complete 100 Google queries every 24 hours.

²¹ According to the ODR Regulation, traders are free to provide their e-mail address anywhere on their website. However, scanning entire websites for an e-mail address is very difficult, if not impossible.

²² <https://www.gnu.org/software/wget/>

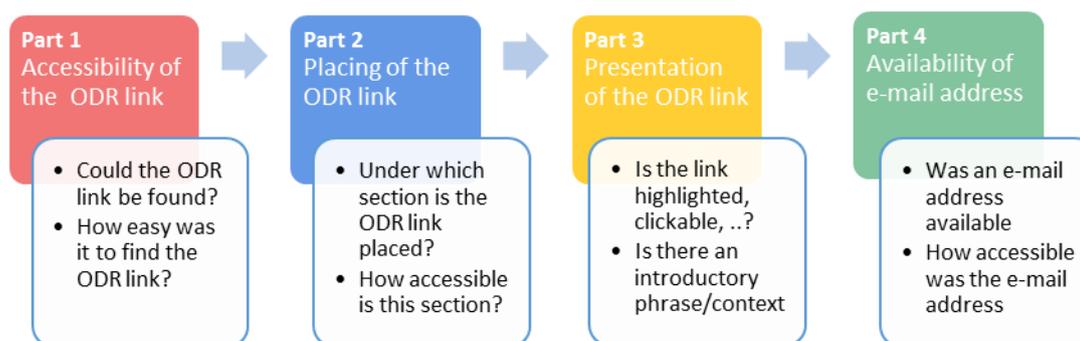
any e-mail address, without testing whether or not the e-mail address belongs to the trader. This may result in a slight overestimation of the number of traders that make their e-mail address available.

2.4 Task4: Mystery shopping

After the web-scraping exercise was completed, a sample of the online traders that complied with the ODR Regulation by including the ODR link and their e-mail address on their website, was further examined with a mystery shopping exercise. This mystery shopping exercise evaluated the ease and the user-friendliness of accessing the ODR link and e-mail address. The current mystery shopping study used an audit approach, requiring mystery shoppers to observe what is being told, happening or available resulting in very detailed assessment or inventories and leaving little room for subjective interpretations. This approach was combined with a number of evaluation questions, which provide further insights into the perceived ease of finding the information.

Mystery shoppers were asked to visit a website and look for the ODR link. When mystery shoppers were unable to find the page with the ODR link, they were given the exact URL to complete the exercise. Using a detailed assessment sheet, mystery shoppers were instructed to document their experience and evaluate the accessibility and user-friendliness of the ODR link on the selected websites. The assessment criteria are based on recent court rulings²³ and best practices^{24,25}. As presented in Figure 1, the assessment was structured around four sections: 1) the accessibility of the ODR link, 2) the placing of the ODR link, 3) the presentation of the ODR link and 4) the availability of an e-mail address of the trader. The briefing documents and assessment sheet are provided in Annex 4.

Figure 1. Structure of the mystery shopping assessment



The mystery shopping investigated 1,005 online traders with an ODR link. The majority of exercises focused on online traders from **10 EU Member States**, that were selected to constitute a representative sample, whilst also securing sufficient sample sizes per country. The 10 countries are *Denmark, France, Germany, Italy, the Netherlands, Poland, Slovakia, Spain, Sweden* and *the UK*. This selection was designed taking into account a geographical spread across four EU regions (North, South, East

²³ On 22.09.2016, the OLG Munich has decided that an active link to the ODR platform has to be provided (Az. 29 U 2498/16), meaning that the ODR link has to be clickable.

²⁴ <https://webaccess.berkeley.edu/resources/tips/web-accessibility>

²⁵ <https://webstandards.hhs.gov/guidelines/>

and West), the number of web shops with the ODR link, the number of top 100 websites with an ODR link, the total spending in the digital single market,²⁶ the proportion of a country's individuals who purchased products and/or services online,²⁷ the proportion of the countries' traders selling online. The 10 countries that were selected performed best on the indicators in the table and presented a good spread across the four EU regions.

Table 1. Country selection for the mystery shopping exercise

Country	Number of websites for which an ODR link was found ²⁸	Number of top 100 websites for which an ODR link was found ²⁹	Total spending on digital single market (in million €) ³⁰	Proportion of individuals who purchased online within the last 12 months ³¹	Enterprises selling online in 2016 ³²
Germany	1,719	18	51,963	77%	26%
Sweden	130	1	5,515	76%	27%
United Kingdom	367	18	39,498	83%	19%
Denmark	211	0	3,556	82%	28%
France	262	14	31 986	66%	17%
Netherlands	297	4	8,175	74%	16%
Spain	190	7	16,894	44%	19%
Italy	198	8	18,206	29%	8%
Poland	340	4	8,175	42%	11%
Slovakia	218	1	2,292	56%	12%
Belgium	168	0	6,095	57%	24%

²⁶ Source: European Commission – DG JUST (2015): Identifying the main cross-border obstacles to the Digital Single Market and where they matter most; covering 12 types of tangible goods and offline services, 4 types of online services and 8 types of digital content.

²⁷ Internet purchases: [http://ec.europa.eu/eurostat/statistics-explained/index.php/File:Internet_use_and_online_purchases,_2016_\(%25_of_individuals\).png](http://ec.europa.eu/eurostat/statistics-explained/index.php/File:Internet_use_and_online_purchases,_2016_(%25_of_individuals).png)

²⁸ Source: Results of the web-scraping study

²⁹ Source: Results of the web-scraping study

³⁰ Source: European Commission – DG JUST (2015): Identifying the main cross-border obstacles to the Digital Single Market and where they matter most; covering 12 types of tangible goods and offline services, 4 types of online services and 8 types of digital content.

³¹ Internet purchases: [http://ec.europa.eu/eurostat/statistics-explained/index.php/File:Internet_use_and_online_purchases,_2016_\(%25_of_individuals\).png](http://ec.europa.eu/eurostat/statistics-explained/index.php/File:Internet_use_and_online_purchases,_2016_(%25_of_individuals).png)

³² Enterprises (all enterprises, without financial sector; 10 persons employed or more) : <http://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database>

Austria	453	0	5,144	58%	15%
Czech Republic	177	0	3,688	47%	27%
Finland	51	1	2,853	67%	18%
Greece	67	1	3,390	31%	10%
Ireland	64	0	2,205	59%	30%
Luxembourg	13	1	587	78%	9%
Portugal	82	0	14,043	31%	19%
Romania	113	0	5,260	12%	7%
Croatia	54	0	1,145,	33%	19%
Estonia	39	0	476	56%	16%
Hungary	141	0	1,978	39%	12%
Lithuania	37	0	884	33%	19%
Malta	1	0	238	47%	20%
Bulgaria	85	0	1,851	17%	5%
Cyprus	1	0	293	29%	13%
Latvia	2	0	495	44%	8%
Slovenia	41	0	608	40%	14%
EU-28	5,521	78	231,578	55%	18%

In each of the 10 countries, between 90 and 120 online traders were selected across the different sectors. In addition to the 10 selected countries, the top 3 websites with an ODR link (the top 2 in Latvia and top 1 in Cyprus and Malta) from the remaining EU countries were included in the analysis. For the selection of web shops, a number of factors was taken into account:

- A representative spread of web shops across the 21 different sectors: the proportion of web shops selected for each sector corresponded with the relative size of this sector (i.e. relative to the proportion of web shops with an ODR link in each of the sectors).
- The selection of web shops started with the biggest web shops, including **top web shops** in each country. However, a selection of both large, medium-sized and small web shops was made to draw conclusions based on the size of the traders.
- The selection of web shops also aimed to include a considerable number of marketplaces.

Annex 5 presents an overview of the distribution of selected traders across countries, sectors and trader size.

3 An overview of the investigated traders

The database of online traders in the EU that were investigated in the current study consists of 19,580 online traders. The database includes websites from all EU28 **countries**. The results also reflect the size of the countries and the development of e-commerce in the respective countries. The biggest countries, Germany, France, the UK, Italy and Spain are much more represented in the database than smaller countries such as Cyprus, Malta or Luxembourg.

Table 2. Investigated online traders per country

Country	Number of traders
Austria	956
Belgium	590
Bulgaria	437
Croatia	210
Cyprus	58
Czech Republic	704
Denmark	462
Estonia	157
Finland	325
France	1,585
Germany	2,607
Greece	584
Hungary	536
Ireland	426
Italy	1,324
Latvia	229
Lithuania	169
Luxembourg	64
Malta	70
Netherlands	1,049
Poland	926
Portugal	399
Romania	481
Slovakia	560
Slovenia	125
Spain	1,169
Sweden	541
United Kingdom	2,563
International	274
Total	19,580

The database includes 21 different **sectors** of different sizes. The highest number of traders is from the 'clothing, shoes and accessories' (3,242 traders) sector. This reflects at least partly data on online purchases, which show that one third of the EU population have purchased these items online in 2016.³³ 'Beauty, health and wellness goods' (2,583), and 'Electronics and Computer Hardware' (2,359) are also very prominent. Interestingly, clothing and footwear and consumer electronics are also among the most reported sectors on the ODR platform.³⁴ In contrast, sectors such as 'Insurances' (170 traders), 'Payment Services' (162 traders) and 'Utilities' (137 traders) are less represented in the current database. The current database also includes **marketplaces**,³⁵ which offer a selling platform for various traders. However, only 284 of the web shops in the database are marketplaces.

Table 3. Investigated online traders per sector

Sector	Number of traders
Clothing, shoes and accessories	3,242
Beauty, health and wellness goods	2,583
Electronics and Computer Hardware	2,359
Entertainment (books, magazines, paper wares, music and movies)	1,459
Travel services	1,194
Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	1,175
(Electrical) household appliances (incl. kitchenware)	1,144
Online reservations of offline leisure	1,008
Spares and accessories for vehicles	854
Telecom services (e.g. internet, mobile telephone services)	848
Computer games and software	841
FMCG	786
Multi-sector	367
Pet and animal products	339
Sport & Leisure	317
Air transport	211
Antiques and collectables	201
Baby and child articles	183
Insurances	170
Payment services	162
Utilities (e.g. electricity, gas, water, petrol)	137
Total	19,580

³³ 2017 Consumer Conditions Scoreboard; retrieved from http://ec.europa.eu/newsroom/just/item-detail.cfm?item_id=117250

³⁴ European Commission Press Release : Buying online and solving disputes online: 24.000 consumers used new European platform in first year ; detrieved from http://europa.eu/rapid/press-release_IP-17-727_en.htm

³⁵ Marketplaces were only identified for websites that were manually checked (websites originating from SimilarWeb, Alexa and desk research)

Table 4 also presents an overview of the number of websites per sector in each country.

Table 4. Investigated online traders per sector in each country

	Air transport	Antiques and collectables	Baby and child articles	Beauty, health and wellness goods	Clothing, shoes and accessories	Computer games and software	(Electrical) household appliances (incl. kitchenware)	Electronics and Computer Hardware	Entertainment (books, magazines, paper wares, music and movies)	FMCG	Furniture, furnishings and decoration	Insurances	Multi-sector	Online reservations of offline leisure	Payment services	Pet and animal products	Spares and accessories for vehicles	Sport & Leisure	Telecom services (e.g. internet, mobile telephone services)	Travel services	Utilities (e.g. electricity, gas, water, petrol)	Total
Austria	16	3	7	101	125	41	88	112	87	27	44	9	65	77	5	7	35	5	27	71	4	956
Belgium	4	8	9	46	117	16	35	91	33	29	61	3	14	18	2	6	24	21	26	26	1	590
Bulgaria		4	8	90	78	8	10	52	20	18	35	3	8	5	7	7	36	5	29	12	2	437
Croatia	1		3	32	30	5	9	33	15	6	9	4	3	8	4	8	10	3	21	6		210
Cyprus				6	8	7	6	9	6		1	1		5						9		58
Czech Republic	6	15	6	112	83	20	16	99	29	39	51	7	14	9	11	18	49	33	57	26	4	704
Denmark	2	4	3	53	75	10	16	49	15	47	47	6	8	7	14	18	35	16	22	14	1	462
Estonia	6	1		24	24	16	18	23	15	2	5	2	1	8	1		2		3	6		157
Finland	3	4	2	36	65	6	8	48	17	14	24	2		2	6	7	23	11	25	21	1	325
France	14	21	16	232	269	59	103	174	115	55	79	8	19	116	20	13	58	22	72	114	6	1,585
Germany	5	33	26	301	418	107	143	326	252	95	110	25	52	205	24	35	99	22	59	226	44	2,607
Greece	12	3	7	115	111	7	23	83	23	24	23	2	12	15	1	26	42	5	19	20	11	584
Hungary	2	1	5	85	79	18	18	73	26	28	14	4	14	20	2	20	42	27	35	21	2	536
Ireland	2	4	5	52	53	18	22	42	30	26	42	2	9	31	2	14	10	9	16	32	5	426
Italy	21	17	7	168	198	79	109	160	145	49	46	2	13	71	3	14	46	13	44	106	13	1,324

Online Dispute Resolution web-scraping

Latvia				22	41	2	23	14	13	4	49		2	3		1	27	26		2		229
Lithuania	7			27	25	18	20	33	14	1	6	2	1	8	1		1		1	4		169
Luxembourg	1	1	1	9	12	3	4	9	7	1	1			6						9		64
Malta	2		2	9	8	5	6	11	3		3	5		6				1		9		70
Netherlands	13	6	16	107	199	36	48	147	67	53	92	7	28	48	10	15	49	30	37	27	14	1,049
Poland	12	7	6	134	156	45	48	101	86	16	44	4	26	35	11	15	41	6	95	35	3	926
Portugal	6	2	10	56	71	21	18	50	29	12	33	1	14	5	1	8	17	3	21	18	3	399
Romania	7		3	93	91	10	14	50	14	33	26	1	10	11	2	19	40	3	39	9	6	481
Slovakia	6	7	4	92	78	20	21	74	31	38	42	2	14	13	5	13	29	15	30	24	2	560
Slovenia			3	19	17	10	11	14	18	2	3	1	1	9		1	4	2		10		125
Spain	18	4	17	148	216	58	72	125	89	55	54	3	10	58	5	18	38	8	72	96	5	1,169
Sweden	6		2	81	94	27	25	64	22	22	50	3	7	11	4	9	31	6	46	29	2	541
United Kingdom	30	50	14	322	411	143	208	268	215	88	172	57	21	192	17	46	65	19	31	186	8	2,563
International	9	6	1	11	90	26	2	25	23	2	9	4	1	6	4	1	1	6	21	26		274
Total	211	201	183	2,583	3,242	841	1,144	2,359	1,459	786	1,175	170	367	1,008	162	339	854	317	848	1,194	137	19,580

In the database, online traders were classified according to the average monthly EU-based website visits. Three equally sized groups were created, resulting in 6,381 small traders (monthly web traffic: <5,000 – 8,855 visits), 6,604 medium-sized traders (monthly web traffic: 8,855 – 66,530 visits) and 6,595 large traders (web traffic: > 66,530).³⁶ The tables below provide an overview of the percentage of website in each country and each sector that are small, medium and large.

Table 5. Investigated online traders, categorized per size in each country and sector

Country	Small	Medium -sized	Large	Sector	Small	Medium -sized	Large
Austria	51%	33%	16%	Air transport	20%	24%	56%
Belgium	39%	37%	23%	Antiques and collectables	59%	32%	9%
Bulgaria	35%	46%	19%	Baby and child articles	29%	32%	39%
Croatia	36%	42%	22%	Beauty, health and wellness goods	35%	39%	25%
Cyprus	81%	10%	9%	Clothing, shoes and accessories	24%	32%	44%
Czech Republic	30%	38%	32%	Computer games and software	40%	25%	35%
Denmark	37%	39%	25%	(Electrical) household appliances (39%	36%	25%
Estonia	53%	28%	19%	Electronics and Computer Hardware	27%	34%	39%
Finland	32%	44%	24%	Entertainment (books, magazines, paper wares, music and movies)	49%	27%	24%
France	24%	28%	48%	FMCG	31%	41%	27%
Germany	32%	30%	38%	Furniture, furnishings and decoration	38%	35%	27%
Greece	31%	42%	27%	Insurances	26%	46%	28%
Hungary	31%	38%	30%	Multi-sector	24%	21%	55%
Ireland	38%	38%	24%	Online reservations of offline leisure	33%	42%	25%
Italy	37%	34%	30%	Payment services	2%	13%	85%
Latvia	53%	43%	3%	Pet and animal products	45%	39%	17%
Lithuania	32%	33%	36%	Spares and accessories for vehicles	34%	47%	19%
Luxembourg	80%	13%	8%	Sport & Leisure	34%	41%	25%
Malta	87%	10%	3%	Telecom services	4%	20%	76%
Netherlands	28%	38%	34%	Travel services	47%	26%	26%
Poland	21%	26%	53%	Utilities	27%	43%	30%
Portugal	34%	38%	28%	Total	33%	33%	33%
Romania	25%	41%	34%				
Slovakia	34%	42%	24%				
Slovenia	54%	31%	14%				
Spain	29%	33%	38%				
Sweden	26%	31%	42%				
United Kingdom	31%	32%	37%				
International	14%	15%	71%				
Total	33%	33%	33%				

³⁶ See Annex 6 for an overview of the web traffic for small, medium-sized and large traders per country

4 Compliance of EU traders to the ODR Regulation

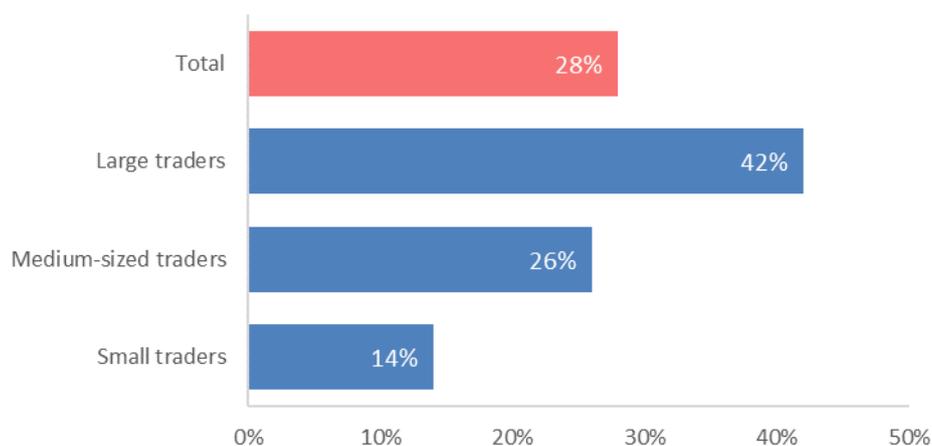
The ODR Regulation requires traders to place a link to the ODR platform and their e-mail address on their website and make it easily accessible for consumers. The results of a web-scraping exercise and a mystery shopping audit provide insights into EU online traders' compliance with these requirements. Concretely, the findings of the web-scraping exercise present the **availability of the ODR link and an e-mail address** on the websites of 19,580 EU online traders, while the findings of the mystery shopping audit illustrate the **accessibility of the ODR link and the e-mail address** on a subset of the websites that provide the ODR link.

4.1 Availability of the ODR link and e-mail address on the websites of online traders

The web-scraping has been conducted between June 1st and July 15th 2017 and the results represent the state of the compliance with the EC Regulation at this point in time. The findings show that overall **28% of the investigated traders have included the link to the ODR platform on their website.**

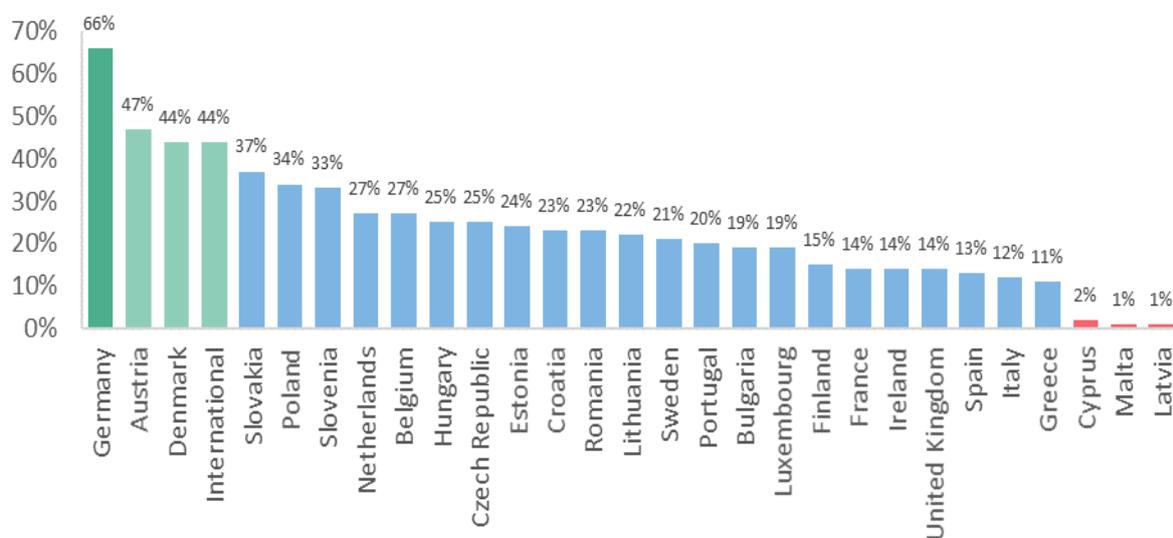
The compliance of online traders with the ODR Regulation depends on the **size of the trader**. As illustrated in Figure 2, almost half of the large traders (42%) included the ODR link on their website. In contrast, medium-sized traders (26%) and small traders (14%) were noticeably less likely to include the ODR link.

Figure 2. Availability of the ODR link conditional per trader size



Similarly, **marketplaces** were also more likely to provide consumers with a link to the ODR platform (48%), compared to other traders (28%). This finding might be explained, however, by the fact that 75% of the marketplaces in the database are classified as large traders.

Compliance with the ODR link also differs across **countries** (Figure 3, Table 6). The results of the web-scraping suggest that traders from Germany (66%) are the most compliant with the ODR requirements. Moreover, almost half of the investigated Austrian traders (47%), Danish traders (44%) and International traders (44%) presented the link to the ODR platform. In contrast, only very few websites from Latvia (1%), Malta (1%) and Cyprus (2%) have the ODR link on their website.

Figure 3. Availability of the ODR link per country**Table 6.** Availability of the ODR link conditional per country

Country	Number of traders investigated	Number of websites with ODR link	Proportion of websites with ODR link
Germany	2,607	1,708	66%
Austria	956	447	47%
Denmark	462	204	44%
International	274	120	44%
Slovakia	560	208	37%
Poland	926	311	34%
Slovenia	125	41	33%
Netherlands	1,049	286	27%
Belgium	590	157	27%
Hungary	536	136	25%
Czech Republic	704	174	25%
Estonia	157	37	24%
Croatia	210	48	23%
Romania	481	109	23%
Lithuania	169	37	22%
Sweden	541	113	21%
Portugal	399	78	20%
Bulgaria	437	84	19%
Luxembourg	64	12	19%
Finland	325	48	15%
France	1,585	228	14%
Ireland	426	61	14%
United Kingdom	2,563	353	14%
Spain	1,169	154	13%
Italy	1,324	163	12%
Greece	584	64	11%
Cyprus	58	1	2%

Malta	70	1	1%
Latvia	229	3	1%
Grand Total	19,580	5,386	28%

Compliance with the ODR Regulation also differs greatly across **sectors**. About half of the websites in the 'Insurances' sector (54%), the 'Payment services' sector (46%), the 'Utilities' sector (42%) and the 'Baby and child articles' sector (42%) include the ODR link on their website. It is noticeable that the best-performing sectors are also often smaller sectors, including a limited number of larger traders. In contrast, only 15% of the 'Online reservations of offline leisure' web shops and of the 'Antiques and collectables' web shops include the ODR link. The 3 biggest sectors, 'Clothing, shoes and accessories' (34%), 'Beauty, health and wellness goods' (24%) and 'Electronics and computer hardware' (31%) perform close to the average.

Figure 4. Availability of the ODR link per sector

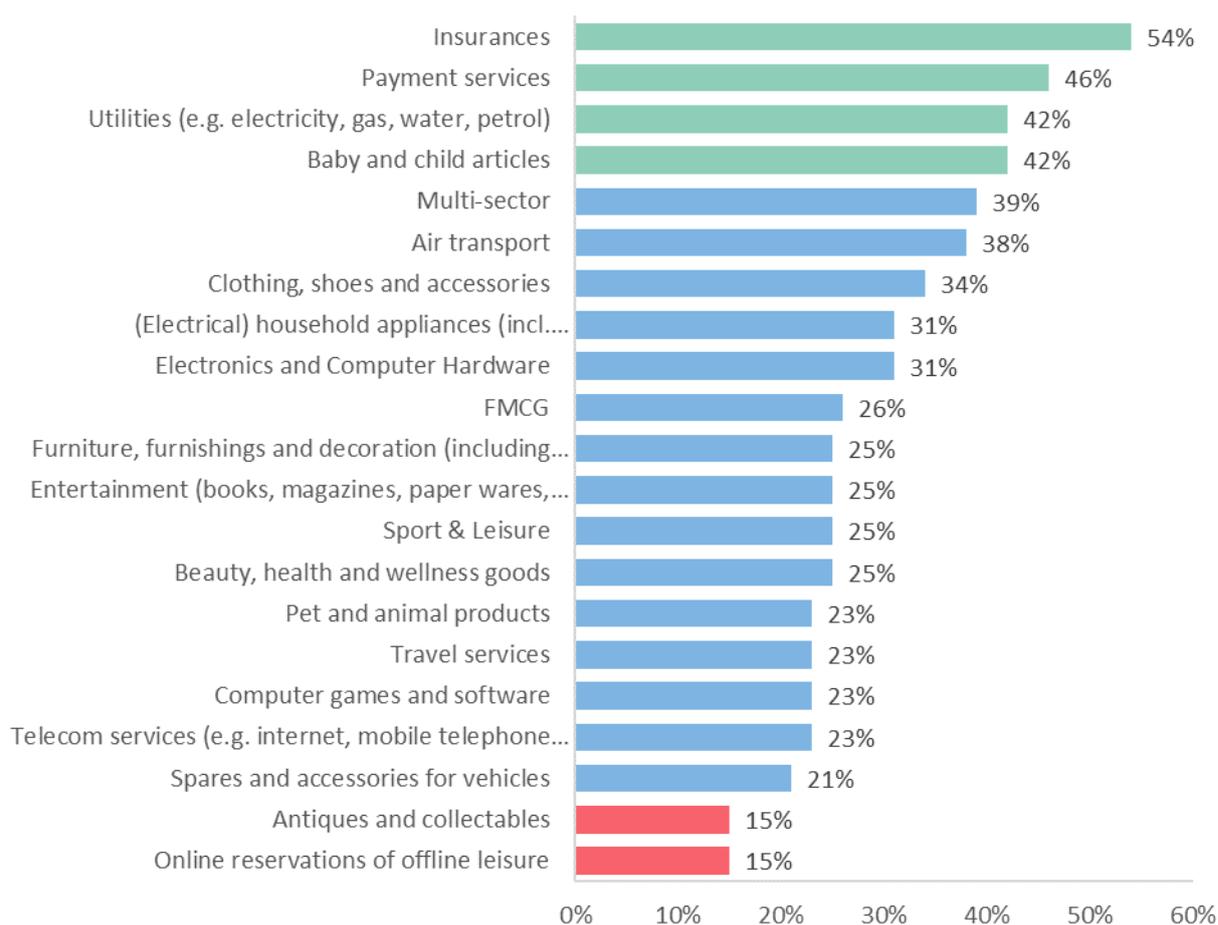


Table 7. Availability of the ODR link per sector

Sectors	Number of traders investigated	Number of websites with ODR link	Proportion of websites with ODR link
Insurances	170	91	54%
Payment services	162	74	46%
Utilities (e.g. electricity, gas, water, petrol)	137	57	42%
Baby and child articles	183	76	42%
Multi-sector	367	144	39%
Air transport	211	80	38%
Clothing, shoes and accessories	3,242	1,107	34%
(Electrical) household appliances (incl. kitchenware)	1,144	353	31%
Electronics and Computer Hardware	2,359	724	31%
FMCG	786	207	26%
Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	1,175	295	25%
Entertainment (books, magazines, paper wares, music and movies)	1,459	360	25%
Sport & Leisure	317	78	25%
Beauty, health and wellness goods	2,583	634	25%
Pet and animal products	339	79	23%
Travel services	1,194	277	23%
Computer games and software	841	195	23%
Telecom services (e.g. internet, mobile telephone services)	848	192	23%
Spares and accessories for vehicles	854	181	21%
Antiques and collectables	201	31	15%
Online reservations of offline leisure	1,008	151	15%
Total	19,580	5,386	28%

The results of the web-scraping exercise also show that **85% of the traders in the database provide their e-mail address**. The compliance of traders with this requirement is equal between large and medium-sized traders (both 88%). However, smaller traders are somewhat less likely to provide their e-mail address (79%). Similarly, the results for marketplaces (82%) are also quite similar to the findings for regular traders (85%).

Compliance with the e-mail address requirement also differs across **countries**, however the country differences are much smaller than for the ODR link requirement (Table 8). The results of the web-scraping suggest that traders in the Czech Republic (90%) are most likely to provide an e-mail address, while in Luxembourg (66%) this was relatively less often the case.

Table 8. Availability of an e-mail address per country

Country	Number of traders investigated	Number of websites with an e-mail address	Proportion of websites with an e-mail address
Czech Republic	704	632	90%
Slovakia	560	500	89%
Estonia	157	140	89%
Denmark	462	411	89%
Sweden	541	481	89%
Latvia	229	202	88%
Finland	325	282	87%
Croatia	210	182	87%
Netherlands	1,049	909	87%
Poland	926	801	87%
Slovenia	125	108	86%
Hungary	536	459	86%
Germany	2,607	2,215	85%
Belgium	590	500	85%
Austria	956	810	85%
Lithuania	169	143	85%
Romania	481	407	85%
Spain	1,169	986	84%
United Kingdom	2,563	2,147	84%
Italy	1,324	1,108	84%
Ireland	426	356	84%
Greece	584	487	83%
Portugal	399	331	83%
France	1,585	1,313	83%
Malta	70	57	81%
International	274	217	79%
Bulgaria	437	344	79%
Cyprus	58	45	78%
Luxembourg	64	42	66%
Total	19,580	16,615	85%

Similarly, there are few differences between sectors, suggesting a relatively high level of compliance across all sectors. Sectors, such as the 'FMCG' (92%), 'Utilities' (91%) and 'Insurances' (91%) show the highest compliance, while 'Baby and child articles' and 'Air transport' (both 79%) perform only slightly worse.

Table 9. Availability of an e-mail address per sector

Sectors	Number of traders investigated	Number of websites with an e-mail address	Proportion of websites with an e-mail address
FMCG	786	724	92%
Utilities (e.g. electricity, gas, water, petrol)	137	125	91%
Insurances	170	155	91%
Spares and accessories for vehicles	854	764	89%
Multi-sector	367	327	89%
Pet and animal products	339	299	88%
Antiques and collectables	201	177	88%
Telecom services (e.g. internet, mobile telephone services)	848	741	87%
Sport & Leisure	317	275	87%
Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	1,175	1011	86%
Entertainment (books, magazines, paper wares, music and movies)	1,459	1253	86%
(Electrical) household appliances (incl. kitchenware)	1,144	981	86%
Beauty, health and wellness goods	2,583	2169	84%
Electronics and Computer Hardware	2,359	1979	84%
Clothing, shoes and accessories	3,242	2702	83%
Online reservations of offline leisure	1,008	835	83%
Computer games and software	841	691	82%
Travel services	1,194	966	81%
Payment services	162	130	80%
Baby and child articles	183	145	79%
Air transport	211	166	79%
Total	19,580	16615	85%

4.2 Accessibility of the ODR link on the trader website

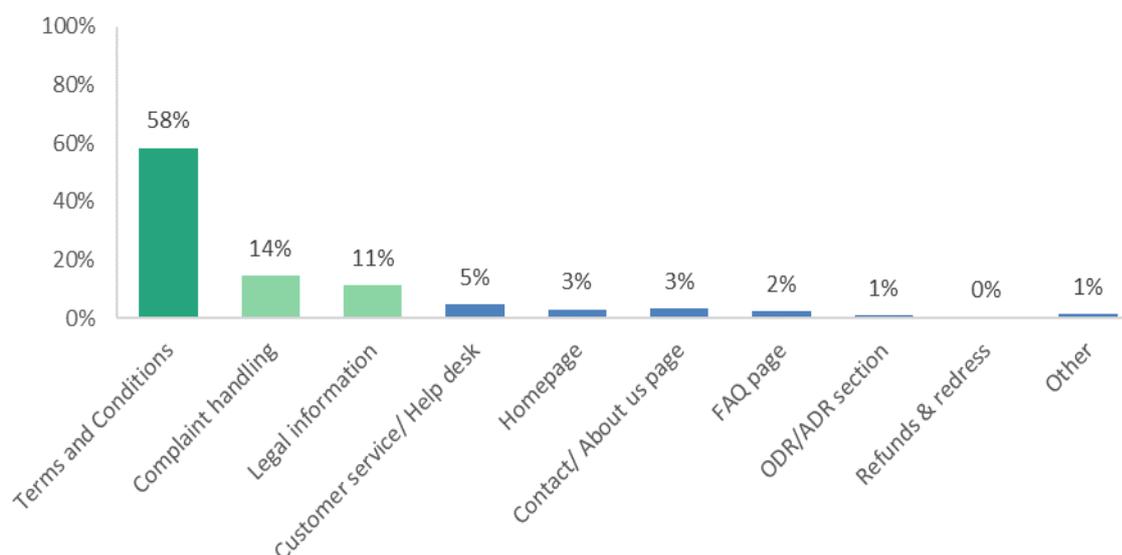
According to Article 14 of the ODR Regulation, EU online traders are not only obliged to post the ODR link on their websites, but also to make this link easily accessible. The goal of the mystery shopping, which was conducted between August 7th and September 15th, was to investigate online traders' compliance with this Regulation, based on a sample of 1,005 traders for which the ODR link was found via the web-scraping. The result of the mystery shopping is the grading of the online traders into websites that offer *easy access*, *moderate access* and *difficult access* to the ODR link. This chapter presents the findings of this exercise and the resulting grading. Annex 7 provides a comprehensive overview of the findings per country, sector and trader size.

4.2.1 Placing of the ODR link

The placing of the ODR link on a trader's website is relevant, as it has a direct effect on the ease with which this information can be found. On the one hand, consumers are more likely to look for this information on pages related to complaint handling or customer service. In addition, when the ODR link is presented in the Terms and Conditions of the trader, it might get lost between an overload of information.

The current findings show that **the ODR link is most often included in the Terms and Conditions of the trader**, which is the case in more than half of the investigated cases. Further, ODR links were also regularly found in the complaint handling section (14%) and in the legal information (11%).

Figure 5. In which section was the ODR link placed?



Base: 1,005 (all investigated websites)

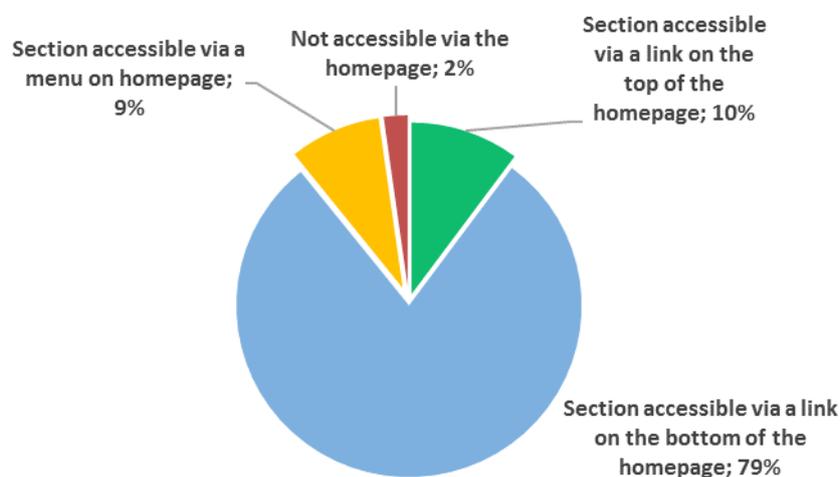
A cross-comparison with the *ease of finding the ODR link* does however not indicate negative effects of placing the ODR link in the Terms and Conditions of the trader. **About ¾ of the mystery shoppers that found the ODR link in the Terms and Conditions found this the link (very) easy to find (78%)**. This is only slightly less than the perceived ease of finding the ODR link in the *legal information* (86%) or on the *homepage* (84%).

Table 10. Perceived ease of finding the ODR-link conditional on where the ODR link was placed

Web page where the ODR link was placed	Ease of finding the ODR link		
	(Very) difficult	Neutral	(Very) easy
Total	11%	14%	75%
Terms and Conditions	8%	14%	78%
Complaint handling	13%	13%	74%
FAQ page	20%	32%	48%
Customer service/ Help desk	27%	15%	58%
Contact/ About us page	23%	30%	47%
Homepage	10%	6%	84%
Legal information	7%	7%	86%
ODR/ADR section	38%	13%	50%
Refunds & redress	0%	0%	100%
Other	46%	31%	23%

Base: 1,005 (all investigated websites)

Whereas the ODR link was not always directly available via the homepage of the trader (2%), **the section with the ODR link was most often accessible via a link on the bottom of the homepage (79%)**. For 10% of the websites, the section was accessible via a link on the top of the homepage, while for 9% of the websites, consumers could find the section via a menu on the homepage.

Figure 6. How was the section with the ODR link accessible via the homepage?

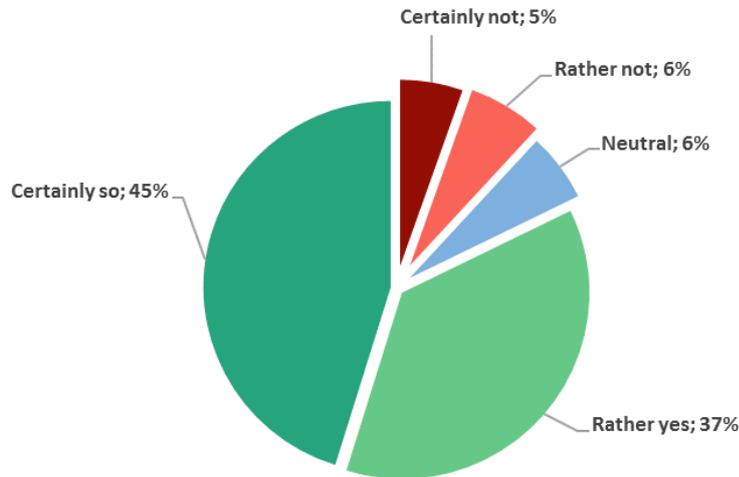
Base: 974 (excluding websites with the ODR link on the homepage)

In the majority of the cases, consumers need to scroll to the bottom of the homepage to access the webpage that contains the ODR link. This process can become onerous when one needs to scroll down a lot to reach the link. In 12% of the cases with a link on the bottom of the homepage, mystery shoppers felt this was the case.

The accessibility of the ODR link is further facilitated when the section with the ODR link can be accessed from most pages of the website. The results show that this is often the case. **In 82% of the cases (including the ones where the ODR link was presented on the homepage), mystery shoppers could access the section with the ODR link**

from most pages of the website. In contrast, in only 11% of the cases mystery shoppers reported that this was impossible.

Figure 7. Was the section with the ODR-link accessible from most pages of the website?



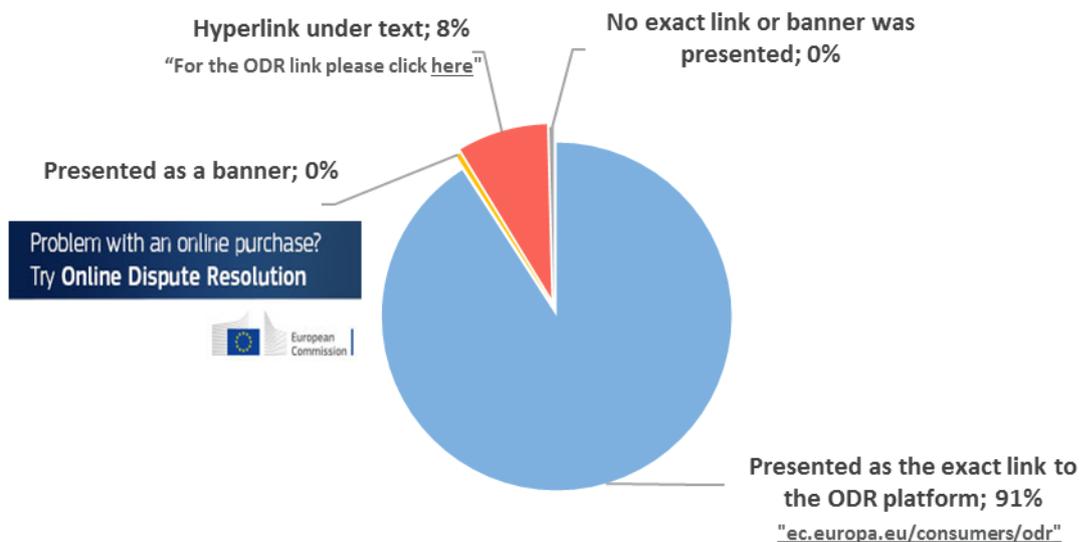
Base: 974 (excluding websites with the ODR link on the homepage)

4.2.2 Presentation and functionality of the ODR link

The accessibility of the ODR link can be further affected by the way it is presented. ODR links that are presented as banners or with a clear introduction may be found easier by consumers than ODR links that are presented more inconspicuously.

The current findings show that **most often, the link to the ODR platform is presented as the exact link to the ODR platform** (i.e. <https://ec.europa.eu/consumers/odr>; 91%). In other instances the link is hyperlinked to text, often related to the ODR, on the website (e.g. clicking on the word 'ODR' directs consumers to the ODR platform; 9%). Only in four cases was the ODR link presented as a banner (0.4%).

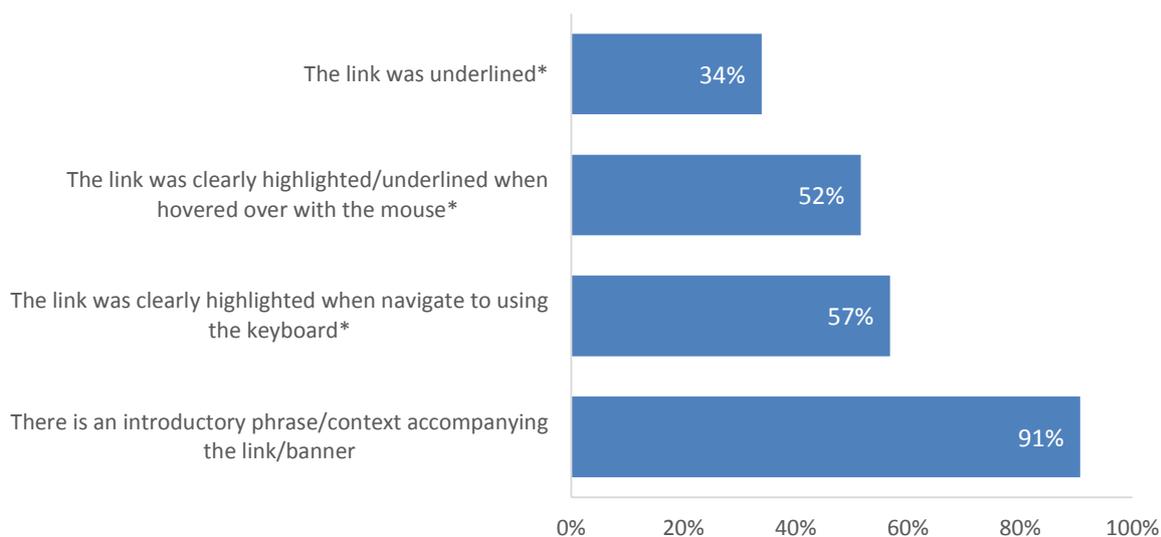
Figure 8. How was the link to the ODR platform presented?



Base: 1,005 (all investigated websites)

The presentation of the ODR link was further evaluated on a number of criteria (see Figure 9). Underlining the link can greatly improve its visibility for consumers. However, only 34% of the ODR links were underlined. About half of the ODR links were highlighted or underlined when hovered over with the mouse (52%) or when navigating to the link with the keyboard (i.e. by using the tab key to jump from link to link on the webpage; 57%). Finally, almost all of the links and banners were accompanied by an introductory phrase or context (91%). This introduction to the ODR link was very often perceived as clear and explanatory (in 83% of all cases).

Figure 9. How was the link to the ODR website presented?³⁷



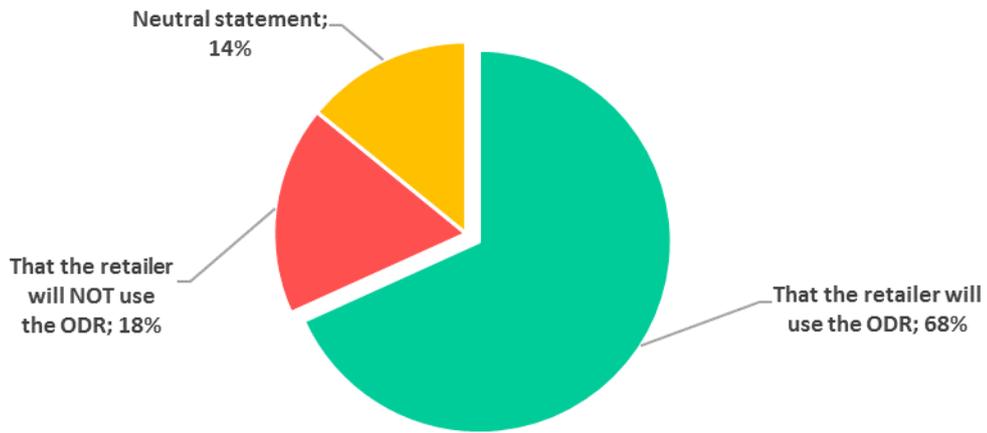
Base: 1,005 (all investigated websites); * not applicable when the link was presented as a banner (Base: 995)

49% of the investigated traders also presented **a statement on whether they plan to use the ODR platform** close to the ODR link. 68% of these traders used this statement to confirm their willingness to use the ODR platform when needed. **However, 18% of the investigated traders that issued a statement stated that they are not obliged to or not willing to participate in the ODR procedure.** The findings show that this was particularly the case for the investigated German traders, where 92% seemed unwilling to adopt the ODR regulation, followed by Dutch (33%) and Swedish traders (92%)³⁸. 14% of the statements were neutral.

³⁷ The graph presents the results the findings of a multi-item battery and each of the items was evaluated separately. Therefore, the percentages will not add up to 100%.

³⁸ The results for the Dutch and Swedish traders are based on a limited sample size (respectively n= 6 and n=7). In contrast, 66 German traders provided a statement with the ODR link

Figure 10. Trader statements to (not) use the ODR platform



Base: 497 (websites that included a statement on whether or not they plan to use the ODR platform)

In most of the cases, the link/banner was clickable (82%) and when this was the case, **the link/banner usually worked (100%)**. Only for three cases, a clickable link would not forward the mystery shopper to the ODR platform.

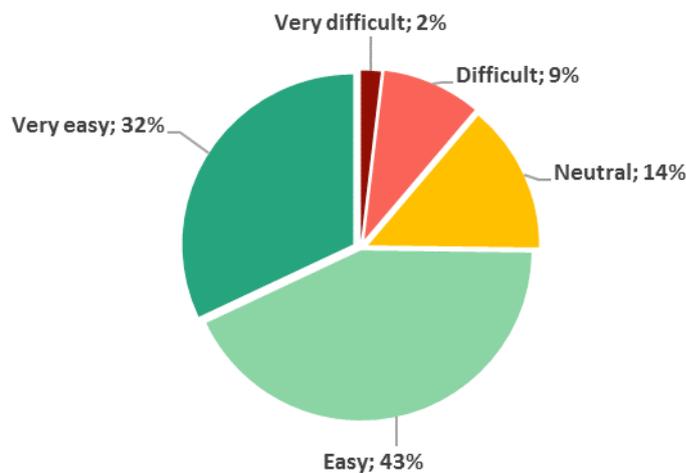
4.2.3 Accessibility of the ODR link

The general accessibility of the ODR link was evaluated in two ways. First, mystery shoppers were asked to report their perceived ease of accessing the ODR link. This subjective measure was supplemented by a more objective grading of the web shops into websites with easy, moderate and difficult to access ODR links.

4.2.3.1 Perceived accessibility of the ODR link

The first part of the mystery shopping audit focused on the ease of finding the ODR link on the online traders' websites. On average, mystery shoppers found it easy to find the ODR link. **75% of the mystery shoppers found it easy or very easy to find the ODR link.** In contrast, 11% found it *difficult* or *very difficult* to find the ODR link.

Figure 11. How easy was the ODR link found?



Base: 1,005 (all investigated websites)

As illustrated in Figure 12 the ODR link was perceived easier to find on the website of small and medium-sized traders. For 82% of the websites of small traders and 83% of the websites of medium-sized traders, mystery shoppers found it (very) easy to find the ODR link. For large traders this was “only” the case for 71% of the traders.

Figure 12. Perceived ease of finding the ODR link per trader size



Base: 1,005 (all investigated websites)

The results also reveal vast country differences. The first half of Table 11 presents the findings for the 10 EU countries of focus for the mystery shopping.³⁹ On average, mystery shoppers perceived it the easiest (*easy/very easy*) to find the ODR link for websites from Germany (93%) and Sweden (90%). In contrast, the ODR link was found less often (very) easily for websites from the Netherlands (61%).

The second half Table 11 shows the findings for the top 3 websites with an ODR link for all EU28 countries (in terms of EU-traffic; top 1 for Malta and Cyprus). For all top 3 websites in Belgium, Croatia, the Czech Republic, the Netherlands, Romania, Slovenia and Sweden, mystery shoppers found it (very) easy to find the ODR link. In contrast, for Ireland, Cyprus, Malta this was the case for none of the investigated websites.

Table 11. Perceived ease of finding the ODR link per country

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		1,005	2%	9%	14%	43%	32%
Countries (10 focus countries)	Germany	95	0%	2%	5%	18%	75%
	Sweden	91	1%	8%	1%	88%	2%
	Slovakia	91	0%	7%	13%	24%	56%
	Denmark	95	1%	16%	3%	76%	4%
	France	98	2%	14%	10%	42%	32%
	Spain	93	1%	9%	17%	59%	14%
	UK	93	3%	5%	20%	22%	49%
	Italy	88	5%	14%	13%	27%	42%
	Poland	120	3%	6%	27%	48%	17%
	Netherlands	91	2%	15%	22%	31%	30%

³⁹ See chapter 2.4

Countries (Top 3 countries) ⁴⁰	Austria	3	0%	0%	33%	67%	0%
	Belgium	3	0%	0%	0%	33%	67%
	Bulgaria	3	0%	0%	33%	67%	0%
	Croatia	3	0%	0%	0%	67%	33%
	Czech Republic	3	0%	0%	0%	100%	0%
	Denmark	3	0%	33%	33%	0%	33%
	Estonia	3	0%	0%	33%	33%	33%
	Finland	3	0%	67%	0%	33%	0%
	France	3	0%	33%	0%	33%	33%
	Germany	3	0%	33%	33%	33%	0%
	Greece	3	0%	0%	0%	67%	33%
	Hungary	3	33%	0%	0%	33%	33%
	Ireland	3	0%	0%	100%	0%	0%
	Italy	3	0%	33%	0%	0%	67%
	Latvia	3	0%	0%	67%	0%	33%
	Lithuania	3	0%	0%	33%	0%	67%
	Luxembourg	3	0%	0%	33%	0%	67%
	Netherlands	3	0%	0%	0%	67%	33%
	Poland	3	0%	0%	67%	0%	33%
	Portugal	3	0%	33%	0%	67%	0%
	Romania	3	0%	0%	0%	67%	33%
	Slovakia	3	0%	67%	0%	33%	0%
	Slovenia	3	0%	0%	0%	33%	67%
	Spain	3	0%	0%	33%	0%	67%
Sweden	3	0%	0%	0%	0%	100%	
UK	3	33%	33%	0%	33%	0%	
Cyprus	1	0%	100%	0%	0%	0%	
Malta	1	0%	0%	100%	0%	0%	

Base: 1,005 (all investigated websites)

The sector results further show that the perceived ease of finding the ODR link was relatively higher for the 'Spares and accessories for vehicles sector' (85%), followed by the 'Entertainment sector' (83%). In contrast, in the 'Utilities' sector, finding this information was perceived the most difficult (only 29% found it (very) easy, while 57% found it (very) difficult).

⁴⁰ The findings for the top 3 websites in each country (except for Malta and Cyprus where only one website was included) are compared to allow for comparisons across all EU countries. For the interpretation of results, the limited sample sizes have to be taken into account.

Table 12. Perceived ease of finding the ODR link per sector

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		1,005	2%	9%	14%	43%	32%
Sectors	Spares and accessories for vehicles	28	0%	4%	11%	46%	39%
	Online reservations of offline leisure	20	0%	0%	15%	40%	45%
	Entertainment (books, magazines, paperwares, music and movies)	66	2%	5%	11%	48%	35%
	FMCG	32	0%	13%	6%	59%	22%
	Beauty, health and wellness goods	132	2%	5%	13%	44%	37%
	Electronics and Computer Hardware	133	1%	8%	11%	44%	36%
	Computer games and software	49	4%	6%	10%	53%	27%
	Baby and child articles	14	0%	7%	14%	43%	36%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	2%	6%	15%	47%	30%
	(Electrical) household appliances (incl. kitchenware)	68	1%	9%	13%	47%	29%
	Travel services	46	2%	4%	17%	30%	46%
	Sport & Leisure	12	0%	8%	17%	67%	8%
	Multi-sector	29	0%	10%	17%	38%	34%
	Pet and animal products	14	0%	14%	14%	36%	36%
	Clothing, shoes and accessories	223	3%	11%	15%	42%	29%
	Payment services	16	0%	38%	6%	31%	25%
	Insurances	11	0%	0%	45%	18%	36%
	Antiques and collectables	2	0%	50%	0%	0%	50%
	Air transport	21	5%	29%	19%	43%	5%
	Telecom services (e.g. internet, mobile telephone services)	29	3%	28%	24%	17%	28%
Utilities (e.g. electricity, gas, water, petrol)	7	14%	43%	14%	0%	29%	

Base: 1,005 (all investigated websites)

The number of clicks consumers need to go through from the homepage of an online trader to the page where they could find the ODR link is another indication of the ease of accessing the ODR link. **On average, mystery shoppers needed two clicks to go from the homepage to the site with the ODR link.** The minimum number of clicks needed was 0 (i.e. when the ODR link was located on the homepage) and the maximum number of clicks was 15. It is important to consider that the number of clicks does not necessarily represent the fastest way from the homepage to the page with the ODR link, but the way that seemed most plausible to the mystery shopper. Hence, ODR links that are somewhat hidden or placed in unexpected places will generate more clicks. **In 22 cases, the page with the ODR link could not be accessed or was extremely difficult to find from the homepage.** In cases where the mystery shopper could not

find the location of the ODR link, the ODR link was mainly mentioned in a PDF-file within the specific product or service sheet.⁴¹

Finally, in only very few cases (20 cases) did mystery shoppers have to use the search engine of the website to find the page with the ODR link. It must be mentioned, that this low number is at least partly driven by the lack of search engines for customer-service related topics on the traders' websites.

The perceived accessibility of the ODR link is likely to be affected by learning effects of the mystery shoppers. After evaluating a number of websites, mystery shoppers were more likely to know where to look for the ODR link, causing an overestimation of the ease of accessing the ODR link.

4.2.3.2 Grading the online traders on the accessibility of the ODR link

Based on the findings of the mystery shopping, a grading was developed to distinguish between online traders that offer *easy* access, *moderate* access and *hard* access to the ODR link. This grading was based on the evaluation items that would most affect the accessibility of the ODR link on a website. It must be noted that this method is based on the mystery shoppers' output. As one mystery shopper could have examined up to 100 webshops, learning effects might have skewed the results in a more positive way. However, the grading system reflects an objective view on the mystery shopping results, presenting the mystery shopping output in a comparative way. Table 13 presents an overview of this grading system.

Table 13. Grading for the accessibility of the ODR link

Evaluation item	(2 points)	(1 point)	(0 points)
The number of clicks needed to go from the homepage to the page with the ODR link ⁴²	1 click or less	2 clicks	3 clicks or more
Placing of the ODR link ⁴³ The link was placed in one of the following sections of the website:	<ul style="list-style-type: none"> - Complaint handling - Homepage - Customer service / help desk - ODR/ADR section 	<ul style="list-style-type: none"> - FAQ - Legal information - Refunds and redress 	<ul style="list-style-type: none"> - Terms and Conditions - Other
Is the page with the ODR link accessible via the homepage	Accessible via the homepage		Not accessible via the homepage
Was the page with the ODR link accessible from most	<ul style="list-style-type: none"> - 'Certainly so' - 'Rather yes' 	<ul style="list-style-type: none"> - 'Neutral' 	<ul style="list-style-type: none"> - 'Certainly not' - 'Rather not'

⁴¹ E.g.: https://mabanque.bnpparibas/rsc/contrib/document/particuliers/produits/comptes-cartes-services/carte-visa-classic/GUIDE_VISA_CLASSIC_WEB_151216.pdf

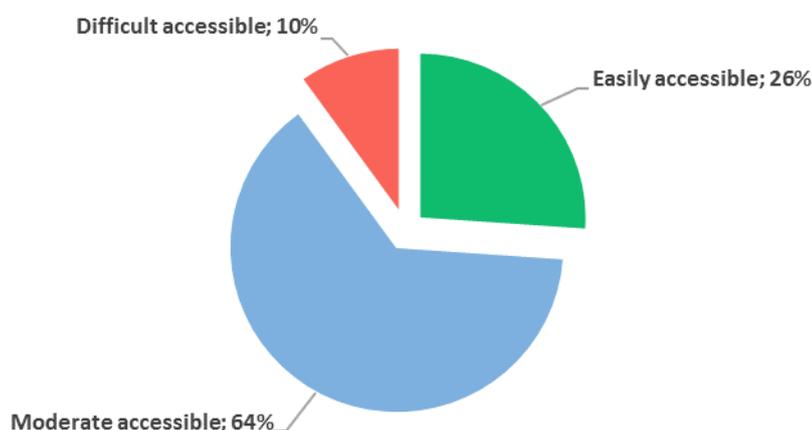
⁴² To calculate the number of clicks that correspond with the ease of access of the ODR link, the mean (M=1.748) and standard deviation (SD=1.127) were calculated for all clicks (without outliers; values +/- 3 SD from the mean).

⁴³ Although the "Terms and conditions" seemed to be an easy place to find the ODR link by the mystery shoppers, it must be noted that the mystery shoppers have learned to look into the terms and conditions in order to find the ODR link. For the average consumer, it might be less intuitive to find information in Terms and conditions, given that these pages are often cluttered with information.

pages of the website			
Presentation of the ODR link (1 point for each feature)	If 3 or 4 of the items below are applicable: <ul style="list-style-type: none"> - Underlined - Highlighted when hovered over with mouse - Highlighted when navigated to with keyboard - Accompanied by introductory phrase 	If 1 or 2 of the items below are applicable: <ul style="list-style-type: none"> - Underlined - Highlighted when hovered over with mouse - Highlighted when navigated to with keyboard - Accompanied by introductory phrase 	If none of the items below are applicable: <ul style="list-style-type: none"> - Underlined - Highlighted when hovered over with mouse - Highlighted when navigated to with keyboard - Accompanied by introductory phrase

For the grading of the websites in terms of accessibility, every website was assessed based on 5 categories. For each category, a website could earn either 0, 1 or 2 points. Thus, in total, a website could earn 0 to 10 points. Websites were distinguished between *easy*, *moderate* and *difficult* by adding up the points and dividing them by the total number of categories (i.e. 5), resulting in a final score between 0 and 2. Websites with a score between 0 and 0.66 are labelled as *difficult*, websites with a score between 0.66 and 1.33 are labelled as *moderate* and websites with a score higher than 1.33 are labelled as *easy*. **The findings show that almost two thirds of the evaluated websites are evaluated as moderate (64%), while 26% provide easy access to the ODR link and for 10% of the websites access was difficult.** The grading is also significantly correlated with the perceived ease of finding the ODR link ($r=.38$): a better grading corresponds with a higher perceived ease.

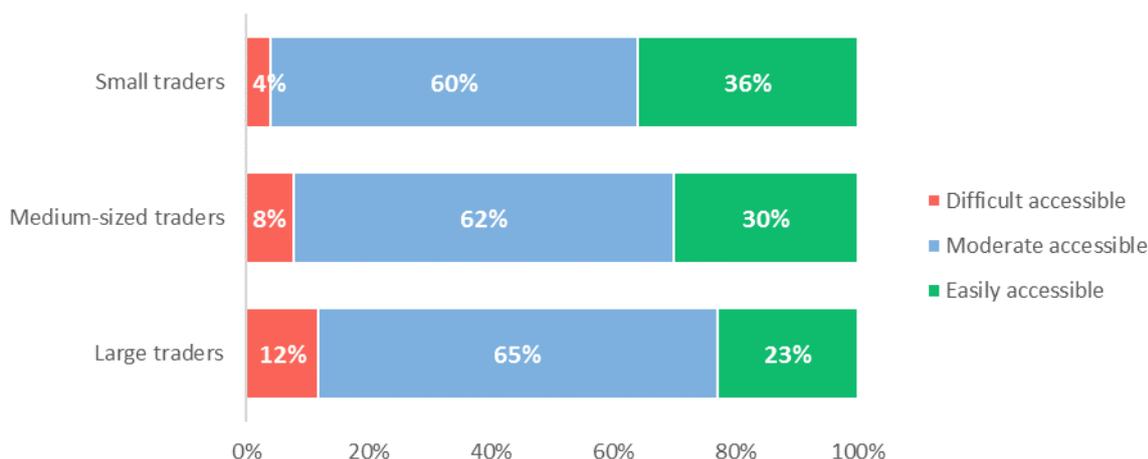
Figure 13. How was accessibility of the ODR link graded?



Base: 1,005 (all investigated websites)

The *trader size* results show a slight negative trend between trader size and the ease of finding the ODR link. The findings suggest that the ODR link is somewhat more easily accessible for small traders (36%), than for medium-sized traders (30%) and for large traders (23%). Similarly, accessibility of the ODR links is more difficult for large traders (12%) than for medium-sized traders (8%) or small traders (4%).

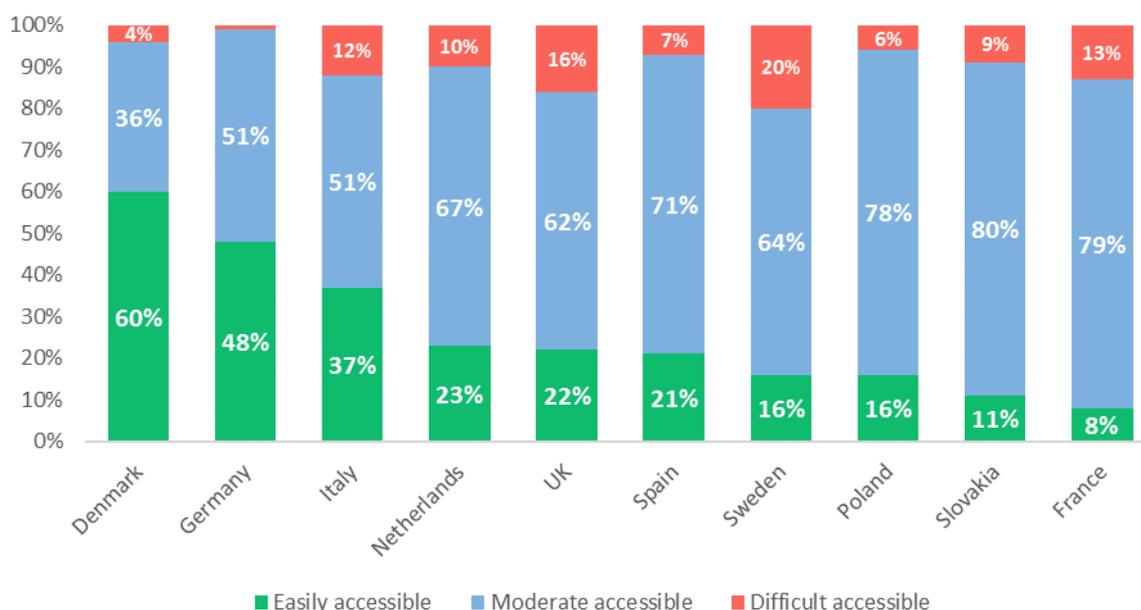
Figure 14. Accessibility of the ODR link by trader size



Base: 1,005 (all investigated websites)

Table 14 presents the grading for the websites across all EU countries. The first half of the table presents the findings of the 10 EU countries that the mystery shopping focused on, while the second half provides findings for the 3 biggest websites in all EU countries (except for Cyprus and Malta, where only 1 website with an ODR link could be found). Overall, the findings show **the ODR link was most often easily accessible on websites of Danish traders (60%)**. **Websites from Sweden were most often graded as difficult (20%)**. The findings for the top online traders show that all of the investigated online traders in Romania and Cyprus made the ODR link easily accessible. In Portugal and Hungary, two third of the top 3 traders made the ODR link difficult to access.

Figure 15. Grading for the accessibility of the ODR link per country – focus countries



Base: 1,005 (all investigated websites)

Table 14. Grading for the accessibility of the ODR link per country

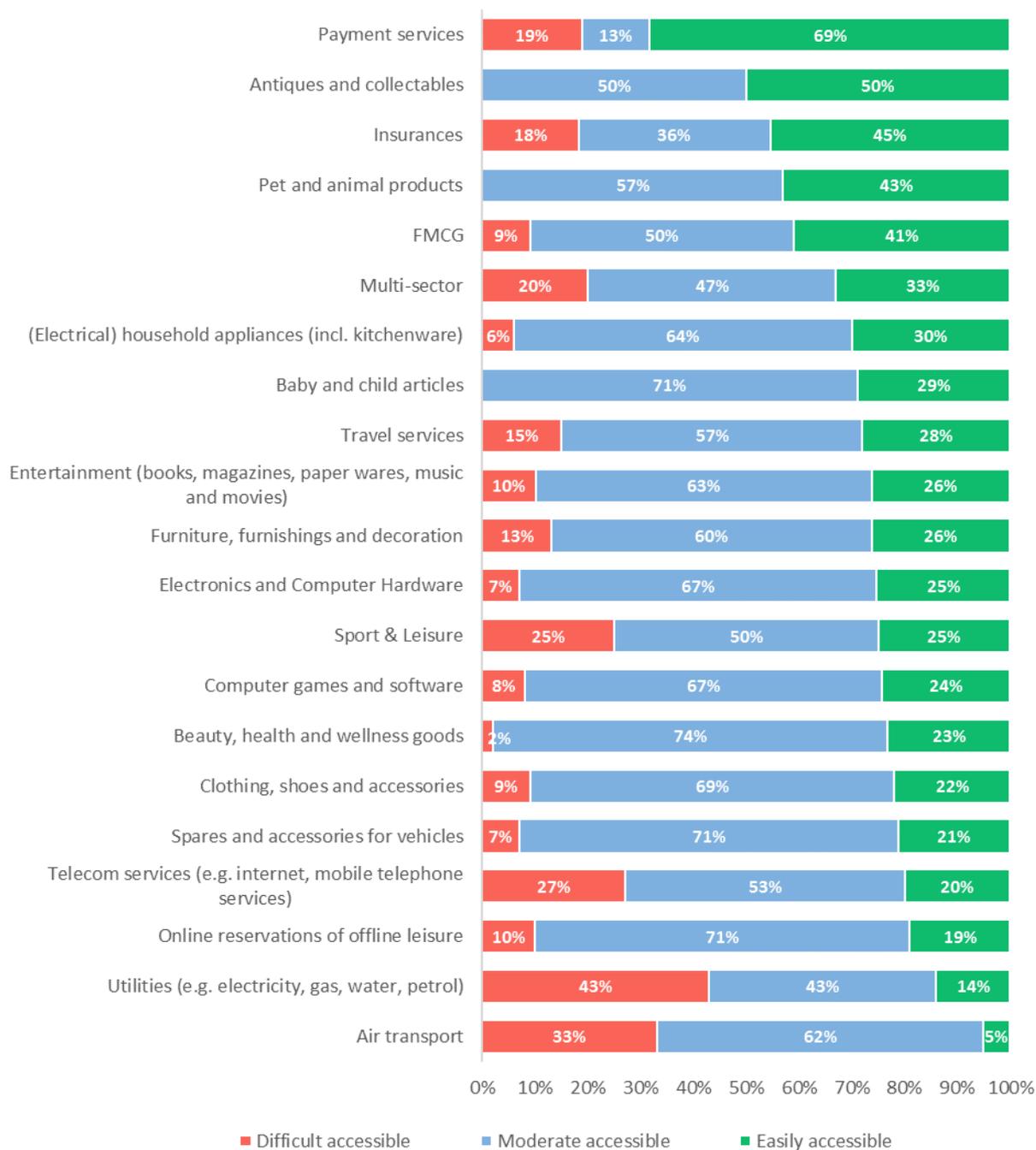
		Base	Easily accessible	Moderate accessible	Difficult accessible
Total		1,005	26%	64%	10%
Countries (10 focus countries)	Denmark	95	60%	36%	4%
	Germany	95	48%	51%	1%
	Italy	88	38%	52%	10%
	Netherlands	91	23%	67%	10%
	UK	93	23%	62%	15%
	Spain	93	22%	72%	6%
	Sweden	91	16%	64%	20%
	Poland	120	16%	78%	6%
	Slovakia	91	11%	80%	9%
	France	98	8%	79%	13%
Countries (Top 3 countries) ⁴⁴	Austria	3	33%	33%	33%
	Belgium	3	33%	67%	0%
	Bulgaria	3	33%	67%	0%
	Croatia	3	67%	33%	0%
	Cyprus	1	100%	0%	0%
	Czech Republic	3	0%	100%	0%
	Denmark	3	67%	33%	0%
	Estonia	3	33%	33%	33%
	Finland	3	67%	33%	0%
	France	3	0%	67%	33%
	Germany	3	0%	100%	0%
	Greece	3	0%	100%	0%
	Hungary	3	0%	33%	67%
	Ireland	3	33%	67%	0%
	Italy	3	67%	0%	33%
	Latvia	3	0%	100%	0%
	Lithuania	3	0%	67%	33%
	Luxembourg	3	0%	67%	33%
	Malta	1	0%	100%	0%
	Netherlands	3	33%	67%	0%
	Poland	3	0%	67%	33%
	Portugal	3	33%	0%	67%
	Romania	3	100%	0%	0%
	Slovakia	3	0%	67%	33%
	Slovenia	3	0%	100%	0%
	Spain	3	0%	100%	0%
Sweden	3	0%	67%	33%	
UK	3	0%	33%	67%	

Base: 1,005 (all investigated websites)

⁴⁴ The findings for the top 3 websites in each country (except for Malta and Cyprus where only one website was included) are compared to allow for comparisons across all EU countries. For the interpretation of results, the limited sample sizes have to be taken into account.

Finally, the findings at sector-level show that **the ODR link was most often easily accessible for 'Payment services' (69%)**, followed by 'Antiques and collectables' (50%) and 'Insurances' (45%). In contrast, **only 5 % of the investigated websites in the 'Air transport' sector made the ODR link easily accessible**. On websites in the 'Utilities' sector (43%) and in the 'Air transport' sector (33%), the ODR link was also noticeable more often difficult to access.

Figure 16. Grading for the accessibility of the ODR link per sector



Base: 1,005 (all investigated websites)

Table 15. Grading for the accessibility of the ODR link per sector

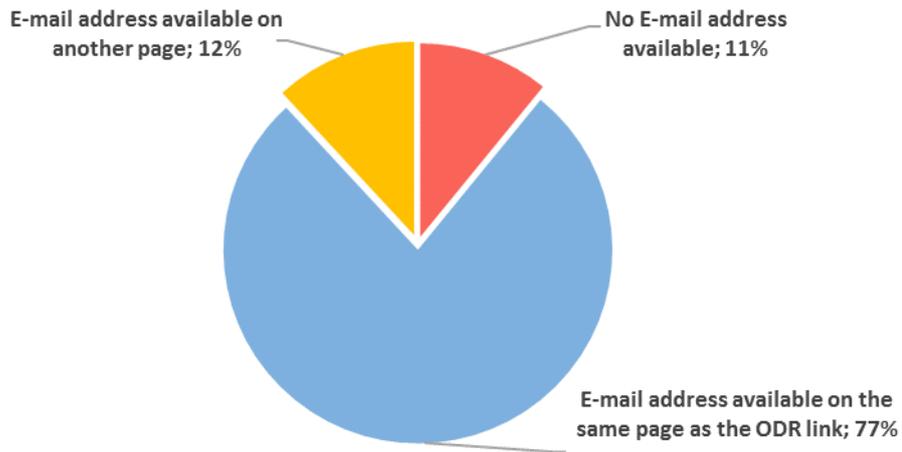
		Base	Easily accessible	Moderate accessible	Difficult accessible
Total		1,005	26%	64%	10%
Sectors	Payment services	16	69%	13%	19%
	Antiques and collectables	2	50%	50%	0%
	Insurances	11	45%	36%	18%
	Pet and animal products	14	43%	57%	0%
	FMCG	32	41%	50%	9%
	Multi-sector	29	34%	45%	21%
	(Electrical) household appliances (incl. kitchenware)	68	31%	63%	6%
	Baby and child articles	14	29%	71%	0%
	Travel services	46	28%	57%	15%
	Entertainment (books, magazines, paperwares, music and movies)	66	27%	64%	9%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	26%	60%	13%
	Electronics and Computer Hardware	133	26%	68%	7%
	Sport & Leisure	12	25%	50%	25%
	Computer games and software	49	24%	67%	8%
	Beauty, health and wellness goods	132	23%	74%	2%
	Clothing, shoes and accessories	223	22%	69%	9%
	Spares and accessories for vehicles	28	21%	71%	7%
	Telecom services (e.g. internet, mobile telephone services)	29	21%	55%	24%
	Online reservations of offline leisure	20	20%	75%	5%
	Utilities (e.g. electricity, gas, water, petrol)	7	14%	43%	43%
Air transport	21	5%	62%	33%	

Base: 1,005 (all investigated websites)

4.2.4 Availability of the e-mail address

Mystery shoppers were also instructed to look for the e-mail address of the trader. In contrast to the web-scraping exercise, mystery shoppers were asked to only report e-mail addresses from the respective traders. **Consistent with the web-scraping findings, the majority of the investigated online traders provide an e-mail address (89%).** In most cases, an e-mail address is (also) provided on the same page as the ODR link. The use of an ODR-specific e-mail address is rare. This was only the case in 9% of the cases that an e-mail address was provided on the same page as the ODR link.

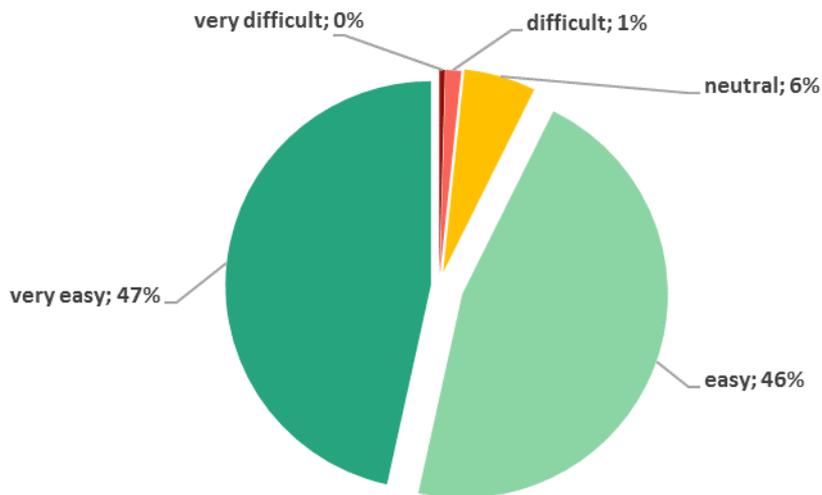
Figure 17. Was the trader's e-mail address available?



Base: 1,005 (all investigated websites)

Overall, mystery shoppers perceived it easy to find the e-mail address of the trader. **For almost all investigated online traders (93%), was it (very) easy to find the e-mail address.**

Figure 18. How easy was the trader's e-mail address found?



Base: 901 (websites for which an e-mail address was found)

Annex 1: Overview of the included sectors

Sectors	Sub-categories
Air transport	Airline websites Flight booking websites
Beauty, health and wellness goods ⁴⁵	Personal care articles Glasses, lenses and optical products Medical products
Clothing, shoes and accessories	Clothing (including work clothing) Shoes Jewellery and watches Handbags and other accessories
Computer games and software	Software Computer games
(Electrical) household appliances (incl. kitchenware) ⁴⁶	Large electrical household appliances (e.g. laundry machines, refrigerators, dishwashers) Small electrical household appliances (e.g. kettles, toasters, grills) Kitchen and cooking equipment Kitchen storage
Electronics and computer hardware	Computers, laptops and computer parts Telecom devices Audio devices E-cigarettes Electronic toys (e.g. drones)
Entertainment (books, magazines, paper wares, music and movies)	Books Magazines (incl. Subscriptions) Paper ware (e.g. postcards, stickers, posters) Music (e.g. CDs, Vinyl, tapes)

⁴⁵ Listed as 'cosmetic and healthcare products' in the ToR

⁴⁶ This category includes small and large electrical household appliances and other non-electrical houseware, such as kitchenware

	Movies (e.g. DVD's, videos)
Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products) ⁴⁷	<p>Furniture</p> <p>Home decoration (indoor and outdoor ; including event decoration)</p> <p>Home lighting and sound</p> <p>DIY items (incl. Construction materials and tools)</p> <p>Gardening items and tools</p> <p>Solar kits</p> <p>Wood shops</p>
Insurances	Insurances
Online reservations of offline leisure	<p>Event tickets</p> <p>Arts, festivals, theatre</p> <p>Theme park tickets</p> <p>Seasonal passes (e.g. beach pass)</p>
Payment services	<p>Banking services (accounts, cards)</p> <p>Bitcoins</p> <p>Loans/mortgage</p>
Spares and accessories for vehicles	<p>Car parts and accessories</p> <p>Motor bike parts and accessories</p>
Telecom services (e.g. internet, mobile telephone services) ⁴⁸	<p>Mobile telephone subscriptions</p> <p>Internet subscriptions</p> <p>Online subscription and services (e.g. news subscriptions)</p> <p>Social media premium accounts</p> <p>Sharing economy websites</p>
Travel services	<p>Booking of accommodation (incl. Hotels)</p> <p>All-inclusive a holidays</p>

⁴⁷ This item corresponds and extends the 'furnishings' sector from the ToR.

⁴⁸ This category combines the sectors 'mobile telephone services' and 'internet services'. Most of the internet providers also provide telephone services and vice versa. Given the small size of both markets, they were combined into one bigger market.

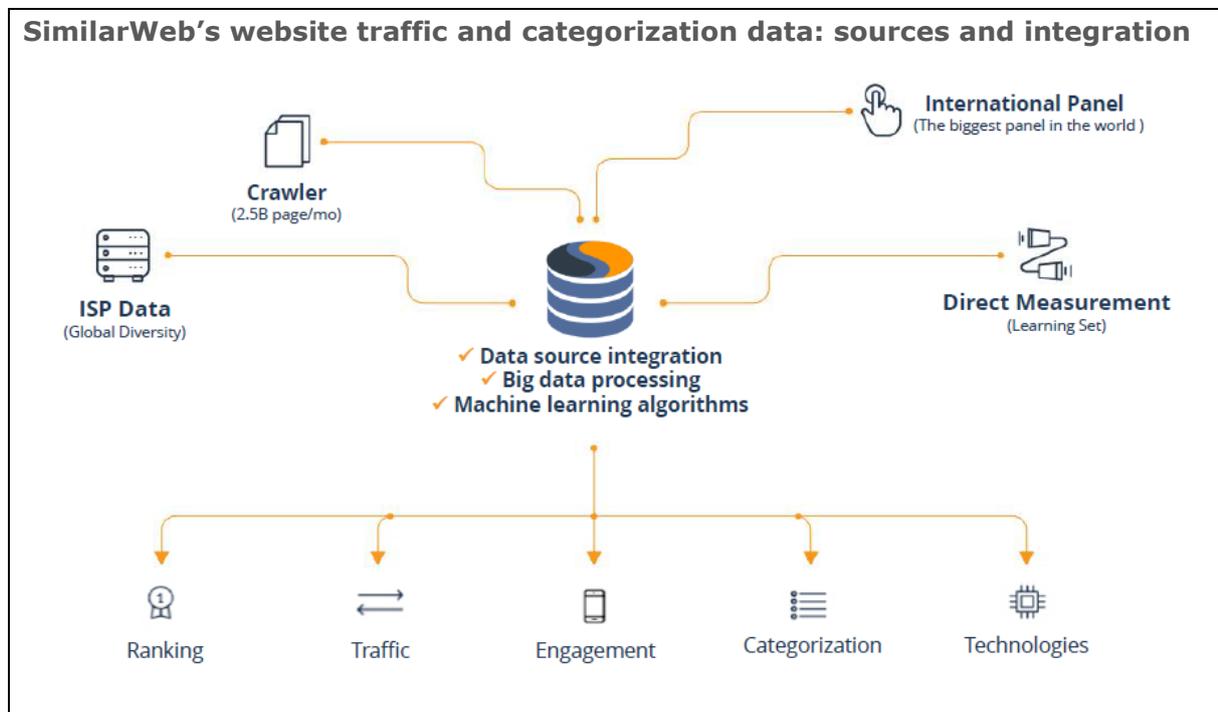
	Car rentals Various tourism services
Utilities (e.g., electricity, gas, water and petrol) ⁴⁹	Electricity Heating Gas, oil, petrol and diesel
Antiques and collectibles*	Antique and vintage goods Coins, bills, medals, stamps and metals Collectibles (toys, trading cards, models)
Baby and child articles*	Baby articles Baby clothing Toys, games and puppets
Fast moving consumer goods (FMCG)*	Food Beverages (non-alcoholic and alcoholic) Other grocery items Tobacco products
Multi-sector*	Includes web shops that sell a large variety of different products (are active in a large variety of sectors)
Pet and animal products*	Animal and pet care Pet food
Sport and Leisure*	Sport accessories Art supplies Musical instruments and accessories (e.g. sheet music) Hunting gear Camping equipment Travel equipment Model building

* Added sectors

⁴⁹ This category includes the sector 'electricity' (as specified in the ToR) and other utilities, such as heating, gas, water and petrol)

Annex 2: The role of SimilarWeb in the current study

SimilarWeb classifies and ranks websites and applications based on online visits (traffic), downloads etc. among other related metrics. They cover the majority of EU Member States with the exclusion of seven countries with the smallest population⁵⁰. All websites are ranked based on country, category and subcategory (sector) and SimilarWeb provides access to the top 100 highest ranked websites based on both websites and mobile traffic (only through the browser, excluding applications) in each EU Member State and in each subcategory. For example, the category named "Shopping" contains a number of subcategories that refer to different sectors, such as "Home and garden", "Consumer electronics", "Clothing and accessories", "Music equipment" etc.. It is important to note that the top 100 websites within a given subcategory (sector) refer to traffic coming from the specific country. However, these lists often include traders that operate in a different country, which receive a lot of cross-border traffic from the country in question. For example, for Austria many German-based traders make it to the top 100 websites within the majority of sectors under the "Shopping" category.



Using SimilarWeb to extract traffic data

SimilarWeb is one of the top providers of competitive intelligence (CI), which gather raw data based on their own user panels and web crawlers. The benefit of SimilarWeb, in comparison to other providers of CI, is that they are able to offer country specific traffic sources for each website, which could especially be useful in order to evaluate cross-border activity. SimilarWeb's traffic ranks are based on an in-house website traffic scoring method, which calculates unique visits and combines them with the number of page views, to determine a website's rank. The method uses data from an international panel collected over a 1-month rolling period. In addition, SimilarWeb also uses two more traffic sources to add to the initial international panel data: their own web crawlers and ISP data. The three sources are then combined into an estimate by using algorithms supported by machine learning. As a result, SimilarWeb has a large database of websites

⁵⁰ These countries include Cyprus, Estonia, Latvia, Lithuania, Luxembourg, Malta and Slovenia.

ranked per country in a given sector and is able to offer detailed cross-border traffic data per country. This cross-border data in itself can also be used to calculate an estimated EU traffic percentage.

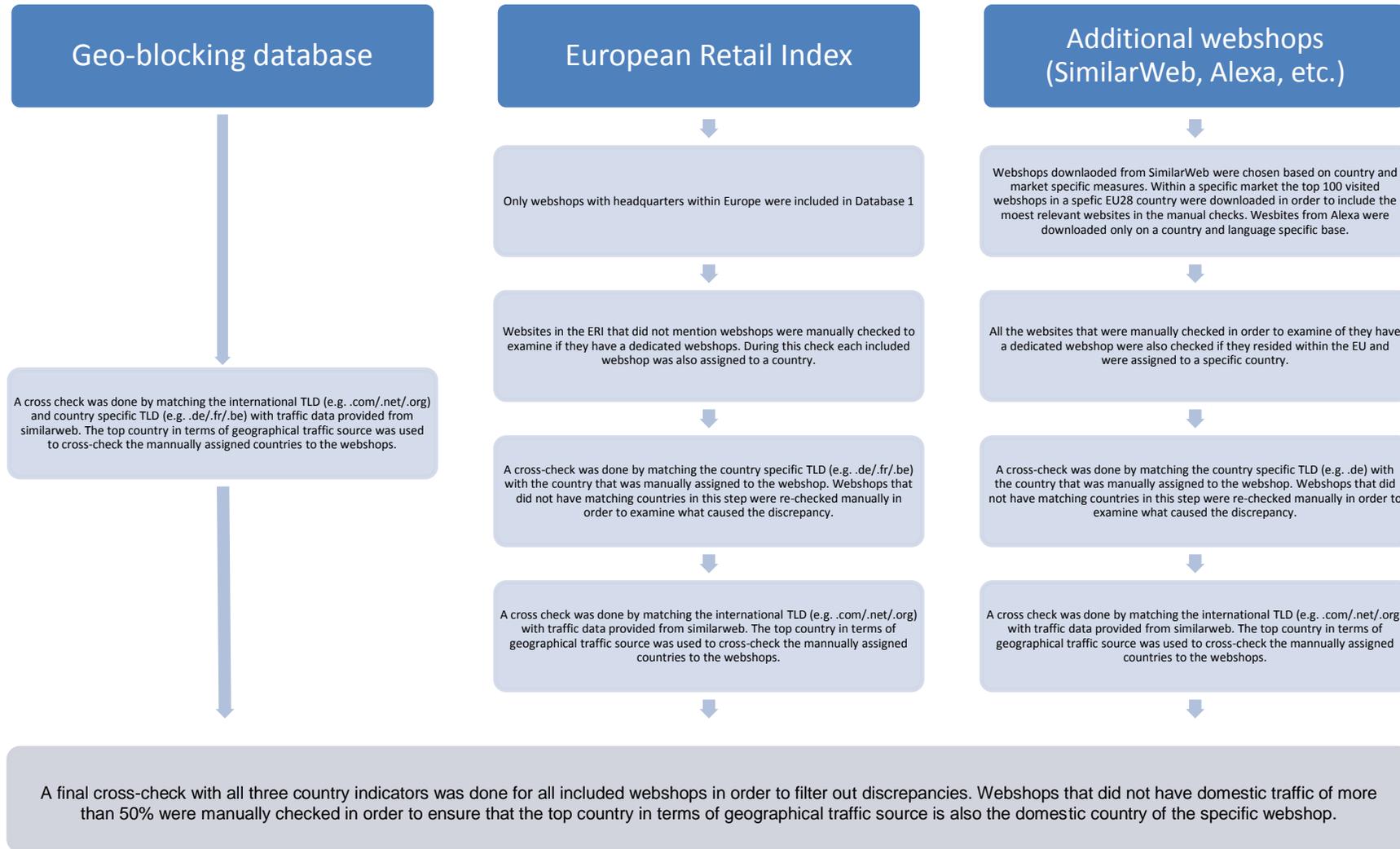
The clear advantage of using SimilarWeb is that their traffic data estimations are likely to be the most accurate on the market because they have the largest panels to collect clickstream data from and use multiple data collection sources. In addition, they have dedicated “shopping” categories. The downside is that SimilarWeb does not provide information on the smallest countries in the EU. According to SimilarWeb, the quality of the data they would provide for these countries, especially for smaller websites, would be too low. This is understandable since in these countries, the amount of clickstream data that can be collected from panels is limited and traffic projections would be of lower quality based on such limited data.

Another extra that SimilarWeb is able to provide is traffic information on subdomains. This might not seem necessary for most websites, but as some e-commerce platforms might be positioned on a subdomain of a website, its inclusion would otherwise need an alternative justification. As SimilarWeb does provide traffic data on subdomains, we can still use the country-specific traffic data of those subdomains in order to justify their selection for each country.

When using SimilarWeb data, it is important to consider that fake traffic generated by bots and the usage of VPNs by internet users, even raw data ends up biased. Restricted websites might for example be bypassed by using a virtual private network (VPN), which makes “geo-spoofing” possible and thereby circumvents the actual location based restrictions. These practices of using bots and VPNs unfortunately also generate a slightly more inaccurate view on the real traffic data. Although the data might not be perfectly accurate, it does still provides good insights of the prominence of websites on the World Wide Web. The traffic estimates, calculated by different algorithms and machine learning, thus still represent a thorough view on the overall popularity of the website itself.

Annex 3: Country classification

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Annex 4: Mystery shopping material

Briefing document

Dear mystery shopper,

The purpose of this mystery shopping exercise is to evaluate how easily accessible is the information related to the Online Dispute Resolution platform of the European Commission (EC) on retailers' websites. Please read this briefing document carefully for the background of the study and general instructions.

Background

The **Online Dispute Resolution (ODR)** is a way of resolving disputes between consumers and traders **online** without going to court, provided by the European Commission. It offers a single point of entry, which allows EU consumers and traders to settle their disputes for both domestic and cross-border online purchases. Complaints can be filed through an EU-wide **ODR platform**.

The ODR Regulation requires online retailers (web shops) to provide the link to the ODR platform on their website in an easily accessible way and also to state their e-mail address. The link they have to provide is either <http://ec.europa.eu/odr> or <https://ec.europa.eu/consumers/odr>.

The **goal of this mystery shopping exercise** is to assess the accessibility of this information on online shops.

Task

Your task will be to visit the website of an online retailer and look for the ODR link. You will evaluate how easily this information can be found and how accessible and user-friendly it is presented. Concretely, the exercise is structured around 4 topics:

- The accessibility of the ODR link
- The placing of the ODR link on the website
- The presentation of the ODR link
- The availability of an e-mail address of the retailer.

Task details

The website you have been assigned will be communicated to you individually. A detailed assessment sheet will guide you through the exercise. Below you will find a brief overview of the different stages of the exercise.

Stage 1: The accessibility of the ODR link

At this stage of the exercise, you will be asked to search for the ODR link, starting from the homepage and to report how easy it was to find the link. Please take track of the number of clicks that are required to get to the page with the link.

If you cannot find the link within a reasonable time frame (2 minutes), you will be given the URL where you can find the link. . In case this happens, please evaluate how easy it would be to arrive at this URL from the homepage.

Stage 2: The placing of the ODR link

During this stage, you will be asked to report where the ODR link can be found on the web page and how it can be accessed.

Stage 3: Presentation of the ODR link

In stage 3 you will evaluate how the ODR link is presented. The link to the ODR platform can be presented as either a link, a banner or a combination of both.

Example of the link to the platform:

Or, you may be eligible to lodge your complaint on the EU Online Dispute Resolution platform which is available at www.ec.europa.eu/consumers/odr.

Example of the web banner:



Stage 4: E-mail address of the retailer

In the final stage, you are asked to evaluate the accessibility of the e-mail address of the retailer. You will need to check whether the e-mail address is presented on the same URL of the ODR-link and/or on different sections of the web page.

Thank you very much for your contribution to our study!

Assessment sheet

The accessibility of the ODR link

Scenario: Starting from the homepage of the website, look for the URL where the ODR-link can be found (the ODR-link can be presented as either a hyperlink or a banner). Report, through the items listed below, the steps you undertake to find the URL. During your search, please consider the home page and links to the following sections: FAQ, Terms & Conditions, Customer Service, Help Desk or Complaint Handling. Consider all the clicks and search engine entries needed to arrive at the URL.

Q1. Did you find the ODR-link? [Y/N]

Q2. [if Q1 = Y] How many clicks did you need to arrive at the ODR-link? [Number]

Q3. [if Q1 = Y] Did you need to use the search engine of the website to find the ODR-link? [Y/N] Q4. [if Q3 = Y] Which search term(s) did you need to use to find the ODR-link [Text]

Q4. [if Q1 = Y] How easy was it to find the ODR-link [1 very difficult 2 difficult 3 neutral 4 easy 5 very easy]

Q5. [if Q1 = Y] Please provide a screenshot of the page displaying the ODR-link (including the ODR-link on the screenshot)

[if Q1 = N] *Scenario:* Please go to the following URL containing the ODR-link: [provide URL of page with ODR-link]. Starting from the home page to the URL where the ODR-link can be found, which steps do you have to take?

Q6. [if Q1 = N] Did you find the ODR-link on this page? [Y/N]

Q7. [if Q6 = Y] How many clicks would you need to go from the homepage to the ODR-link? [Number]

Q8. [if Q6 = Y] Did you need to use the search engine of the website to find the ODR-link? [Y/N]

Q9. [if Q6 = Y] Which search terms did you need to use to find the ODR-link [Text]

Q10. [if Q6 = Y] How easy was it to find the ODR-link [1 very difficult 2 difficult 3 neutral 4 easy 5 very easy]

Q11. [if Q6 = Y] Why were you unable to find the ODR-link on this website before? [Text]

Q12. [if Q6 = Y] Please provide a screenshot of the page displaying the ODR-link (including the ODR-link on the screenshot)

The placing of the ODR link

[if Q1 = Y OR Q6 = Y]

Scenario: We would like to know about the page where the ODR-link is placed.

Q13. Under which section or part of the website is the ODR-link provided *[Multiple answers possible]*

- Terms and conditions
- Complaint handling
- FAQ page
- Customer Service / Help Desk
- Contact page
- "About us" page
- Homepage
- Other, namely: ...

Q14. Please provide the concrete name of the section where the ODR link is presented *[Text]*

Q15. *[if Q13 IS NOT 'Homepage']* How is this section accessible from the homepage? *[Multiple answers possible]*

- Via a link on the **top** of the homepage
- Via a link on the **bottom** of the homepage
- Via a menu

Q16. *[if Q15 = 'bottom']* Did you have to scroll down a lot to reach the link to the section on the bottom of the homepage? *[Y/N]*

Q17. *[if Q13 IS NOT 'Homepage']* Is this section accessible from most pages of the website? *[1 Certainly not 2 Rather not 3 neutral 4 Rather yes 5 Certainly so]*

Presentation of the ODR link

[if Q1 = Y OR Q6 = Y]

Scenario: We would like to know more about how the ODR-link is presented. Please evaluate the presentation of the link on the following items:

Q18. How is the link presented? *[Single answer]*

- Presented as the exact link to the ODR platform (<http://ec.europa.eu/odr> or <https://ec.europa.eu/consumers/odr>)
- Presented as a banner
- There is both a banner and a link within the text on the URL webpage
- Other, namely

Q19. Is the link underlined? [Y/N/not applicable]

Q20. Is the link clearly highlighted when you hover over it with your mouse? [Y/N/not applicable]

Q21. Is the link clearly highlighted when you navigate to it using your keyboard (*use the **tab** key to jump from link to link on the webpage*)? [Y/N/ not applicable]

Q22. Is the link/banner clickable? [Y/N/not applicable]

Q23. Does the link work correctly (do you arrive at the ODR platform when clicking the link/banner)? [Y/N/not applicable]

Q24. Is there an introductory phrase/context accompanying the link/banner? [Y/N/not applicable]

Q25. Do you perceive the introductory text as clear and explanatory? [Y/N/not applicable]

Q26. Is there a statement from the trader/marketplace on whether they plan to use the platform? [Y/N/not applicable]

E-mail address of the retailer

Scenario: The last section of this exercise concerns the availability of an e-mail address of the retailer. Look for the e-mail address and evaluate this search on the following items:

Q27. Was an e-mail address of the retailer available on the same page as the ODR link? [Y/N]

- Yes, a general one
- Yes, an ODR specific one
- Other, please specify ...
- No

Q28. [if Q27 = Y] How easy was it to find this e-mail address [1 very difficult 2 difficult 3 neutral 4 easy 5 very easy]

Q29. Was an e-mail address of the retailer provided in a different section of the website? [Multiple answers possible]

- Yes, on the **homepage**
- Yes on the "**About us**" page
- Yes, on the **Contact** page
- Yes, on the **Complaint handling** page
- Yes, on the **FAQ** page
- Yes, on the **Customer Service / Help Desk** page

- Yes, in the **Terms and conditions**
- Other, namely: ...
- No

Q30. [if Q29 IS NOT "No"] How easy was it to find this e-mail address [1 very difficult 2 difficult 3 neutral 4 easy 5 very easy]

Annex 5: Distribution of selected traders across countries, sectors and trader size

Figure 19. Distribution of mystery shopping cases across countries

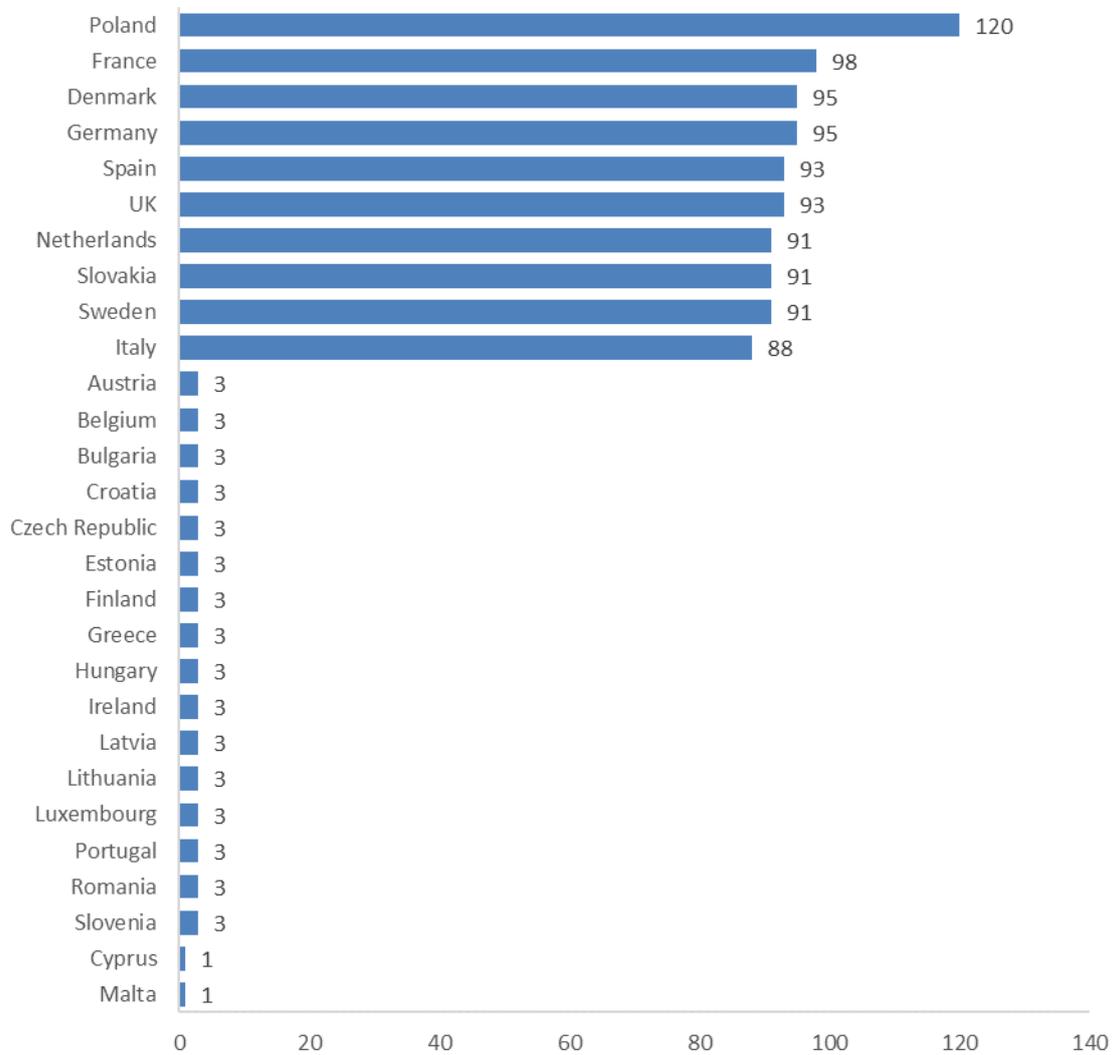


Figure 20. Distribution of mystery shopping cases across trader size

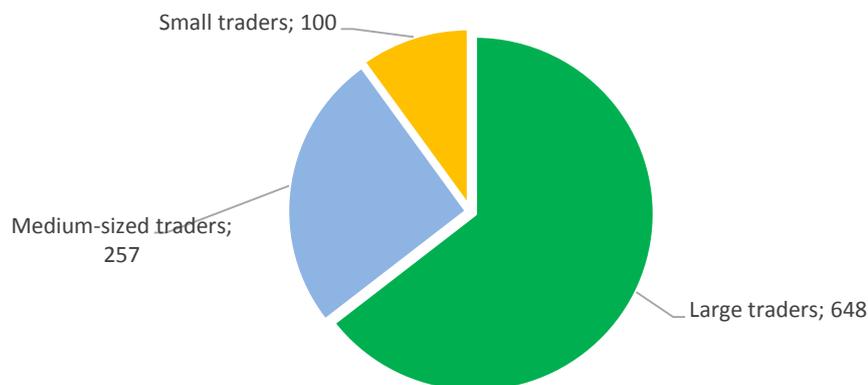
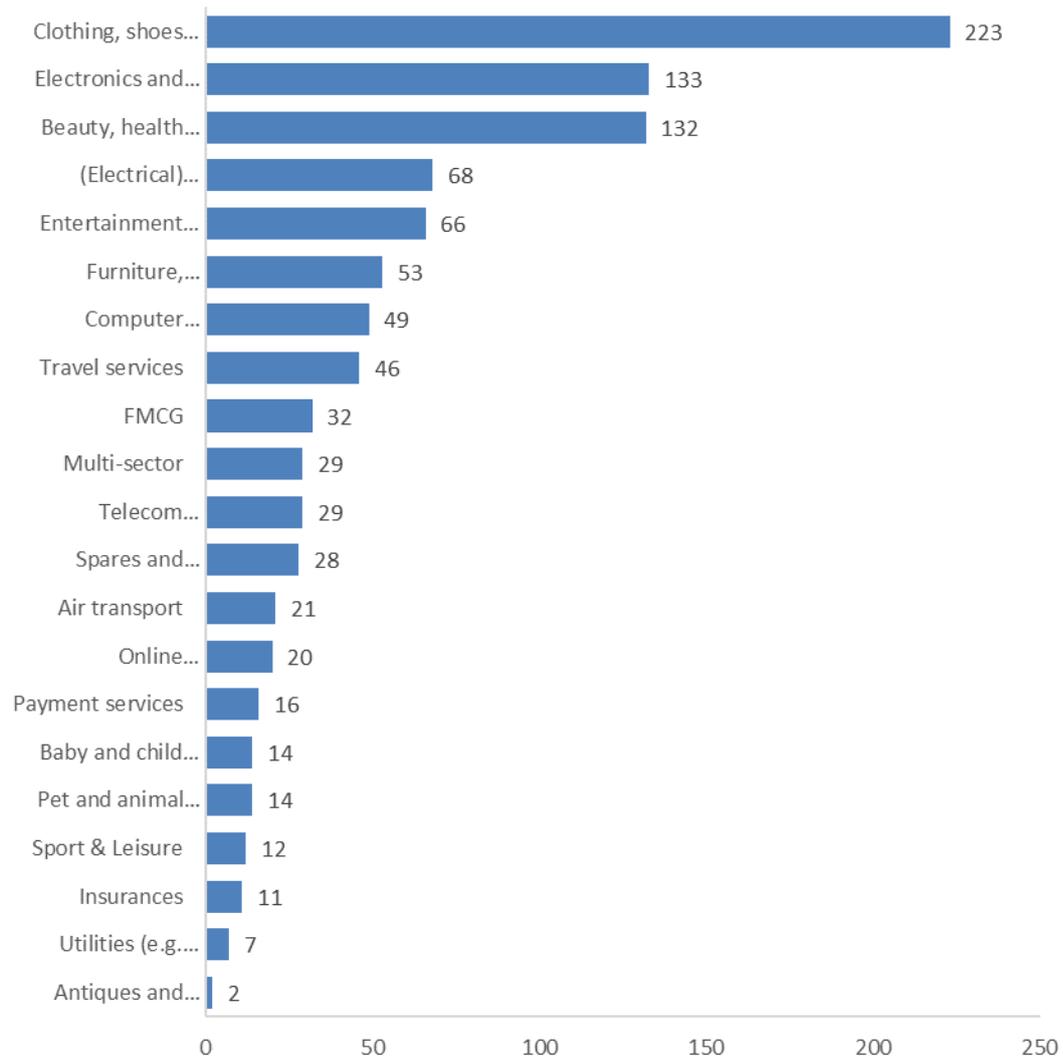


Figure 21. Distribution of mystery shopping cases across sectors

Online Dispute Resolution web-scraping



Annex 6: Overview of small, medium-sized and large traders per country

Table 16. Minimum and maximum EU traffic values for small, medium-sized and large traders in each country

Country	Small traders	Medium-sized traders		Large
	Max (EU Traffic < ...)	Min (EU Traffic > ...)	Max (EU Traffic < ...)	Min (EU Traffic > ...) ⁵²
Austria	8,843	8,939	66,325	68,150
Belgium	8,850	8,947	66,529	67,766
Bulgaria	8,827	8,876	65,395	67,959
Croatia	8,795	8,893	66,279	76,076
Cyprus	7,485	10,265	50,135	142,661
Czech Republic	8,838	8,960	66,467	66,618
Denmark	8,602	8,925	65,300	66,547
Estonia	8,035	9,258	66,304	83,974
Finland	8,627	9,242	65,003	66,744
France	8,767	8,869	66,447	66,840
Germany	8,850	8,859	66,381	66,560
Greece	8,807	8,946	65,992	66,541
Hungary	8,801	8,893	66,530	66,768
Ireland	8,771	9,012	66,473	66,972
Italy	8,852	8,941	66,482	66,593
Latvia	8,704	8,889	66,258	73,208
Lithuania	7,826	8,893	66,047	66,841
Luxembourg	8,743	10,095	42,167	72,324
Malta	8,714	10,109	23,573	221,643
Netherlands	8,822	9,020	65,899	66,684
Poland	8,846	8,866	66,116	66,680
Portugal	8,831	8,870	63,313	67,782
Romania	8,827	8,886	66,217	67,039
Slovakia	8,814	8,904	65,673	66,630
Slovenia	7,971	8,916	65,592	67,890
Spain	8,537	8,870	66,520	67,708
Sweden	8,805	8,929	63,053	67,967
United	8,829	8,864	66,290	66,583

⁵² Cyprus and Malta both show a large amount of minimum EU traffic due to having only a limited amount of large traders available (respectively 5 and 2 retailers). These large traders also mainly show high traffic and high rates of domestic and EU traffic.

Kingdom				
International	8,749	9,932	61,868	69,477
Average	8,855	8,855	66,530	66,530

Annex 7: Mystery shopping findings per country, sector and trader size

a) Section where the ODR link is placed

Table 17. Section where the ODR link is placed (by country)

		Base	Terms and Conditions	Complaint handling	Legal information	Customer service/ Help desk	Homepage	Contact/About us page	FAQ page	ODR/ADR section	Refunds & redress	Other
Total		1005	58%	14%	11%	5%	3%	3%	2%	1%	0%	1%
Countries (10 focus countries)	Poland	120	78%	17%	2%	1%	3%	0%	0%	0%	1%	0%
	France	98	81%	2%	10%	0%	1%	2%	0%	1%	0%	3%
	Denmark	95	18%	59%	1%	18%	0%	2%	0%	0%	0%	2%
	Germany	95	38%	0%	58%	0%	0%	1%	0%	3%	0%	0%
	Spain	93	66%	0%	19%	2%	4%	6%	1%	0%	0%	1%
	UK	93	54%	10%	12%	2%	6%	5%	4%	2%	1%	3%
	Netherlands	91	26%	26%	2%	11%	1%	11%	20%	1%	0%	1%
	Slovakia	91	87%	8%	0%	1%	0%	1%	0%	0%	2%	1%
	Sweden	91	80%	7%	3%	9%	1%	0%	0%	0%	0%	0%
	Italy	88	59%	16%	10%	1%	8%	2%	1%	1%	1%	0%
Countries (Top 3 websites)	Austria	3	0%	0%	33%	33%	0%	0%	0%	0%	0%	33%
	Belgium	3	67%	0%	0%	0%	0%	0%	33%	0%	0%	0%
	Bulgaria	3	33%	0%	0%	0%	67%	0%	0%	0%	0%	0%
	Croatia	3	0%	33%	0%	33%	33%	0%	0%	0%	0%	0%
	Czech Republic	3	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Denmark	3	0%	67%	0%	33%	0%	0%	0%	0%	0%	0%
	Estonia	3	67%	33%	0%	0%	0%	0%	0%	0%	0%	0%
	Finland	3	33%	67%	0%	0%	0%	0%	0%	0%	0%	0%
	France	3	67%	0%	0%	0%	0%	0%	0%	0%	0%	33%
	Germany	3	33%	0%	67%	0%	0%	0%	0%	0%	0%	0%
	Greece	3	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Hungary	3	67%	0%	0%	0%	0%	0%	0%	0%	0%	33%
	Ireland	3	0%	33%	0%	67%	0%	0%	0%	0%	0%	0%
	Italy	3	33%	0%	0%	0%	33%	33%	0%	0%	0%	0%
	Latvia	3	67%	0%	0%	0%	0%	33%	0%	0%	0%	0%
	Lithuania	3	67%	0%	0%	33%	0%	0%	0%	0%	0%	0%
	Luxembourg	3	33%	0%	67%	0%	0%	0%	0%	0%	0%	0%
	Netherlands	3	33%	0%	0%	0%	33%	33%	0%	0%	0%	0%
	Poland	3	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Portugal	3	67%	33%	0%	0%	0%	0%	0%	0%	0%	0%
Romania	3	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	
Slovakia	3	67%	33%	0%	0%	0%	0%	0%	0%	0%	0%	
Slovenia	3	67%	0%	0%	0%	33%	0%	0%	0%	0%	0%	
Spain	3	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	

	Sweden	3	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	UK	3	67%	0%	0%	0%	0%	0%	0%	0%	0%	33%
	Cyprus	1	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%
	Malta	1	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%

Base: 1,005 (all investigated websites)

Table 18. Section where the ODR link is placed (by sector)

		Base	Terms and Conditions	Complaint handling	Legal information	Customer service/ Help desk	Homepage	Contact/About us page	FAQ page	ODR/ADR section	Refunds & redress	Other
Total		1,005	58%	14%	11%	5%	3%	3%	2%	1%	0%	1%
Sector	(Electrical) household appliances (incl. kitchenware)	68	53%	12%	16%	6%	4%	4%	3%	0%	0%	1%
	Air transport	21	52%	10%	19%	0%	0%	5%	14%	0%	0%	0%
	Antiques and collectables	2	50%	0%	50%	0%	0%	0%	0%	0%	0%	0%
	Baby and child articles	14	43%	14%	14%	7%	7%	14%	0%	0%	0%	0%
	Beauty, health and wellness goods	132	61%	10%	10%	5%	4%	2%	6%	2%	2%	0%
	Clothing, shoes and accessories	223	64%	11%	10%	7%	2%	3%	2%	1%	0%	0%
	Computer games and software	49	63%	18%	8%	6%	0%	0%	2%	2%	0%	0%
	Electronics and Computer Hardware	133	62%	17%	9%	4%	3%	2%	0%	1%	0%	2%
	Entertainment (books, magazines, paperwares, music and movies)	66	56%	17%	12%	6%	3%	2%	2%	0%	2%	2%
	FMCG	32	53%	31%	6%	3%	0%	6%	0%	0%	0%	0%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	58%	21%	9%	0%	0%	4%	6%	0%	0%	2%
	Insurances	11	18%	55%	9%	0%	0%	18%	0%	0%	0%	0%
	Multi-sector	29	59%	7%	3%	17%	14%	0%	0%	0%	0%	0%
	Online reservations of offline leisure	20	65%	5%	20%	0%	0%	5%	5%	0%	0%	0%
	Payment services	16	19%	56%	13%	0%	0%	0%	6%	0%	0%	6%
	Pet and animal products	14	43%	14%	21%	14%	0%	7%	0%	0%	0%	0%
	Spares and accessories for vehicles	28	79%	7%	7%	0%	0%	7%	0%	0%	0%	0%

Sport & Leisure	12	58%	17%	8%	8%	0%	0%	0%	0%	8%	0%
Telecom services (e.g. internet, mobile telephone services)	29	45%	14%	3%	0%	21%	3%	0%	0%	0%	14%
Travel services	46	57%	2%	28%	2%	4%	2%	2%	0%	0%	2%
Utilities (e.g. electricity, gas, water, petrol)	7	43%	14%	29%	0%	0%	0%	0%	0%	0%	14%

Base: 1,005 (all investigated websites)

Table 19. Section where the ODR link is placed (by trader size)

	Base	Terms and Conditions	Complaint handling	Legal information	Customer service/ Help desk	Homepage	Contact/About us page	FAQ page	ODR/ADR section	Refunds & redress	Other
Total	1005	58%	14%	11%	5%	3%	3%	2%	1%	0%	1%
Size											
Large-sized traders	648	61%	13%	9%	5%	4%	3%	2%	1%	1%	2%
Medium-sized traders	257	55%	17%	14%	4%	2%	3%	5%	0%	0%	0%
Small traders	100	52%	16%	18%	7%	1%	4%	1%	1%	0%	0%

Base: 1005 (all investigated websites)

b) How is the section with the ODR link accessible via the homepage?

Table 20. Accessibility of the webpage with the ODR link from the homepage (by country)

		Base	Section accessible via a link on the top of the homepage	Section accessible via a link on the bottom of the homepage	Section accessible via a menu on homepage	Not accessible via the homepage
Total		974	10%	79%	9%	2%
Countries (10 focus countries)	Poland	120	5%	89%	3%	0%
	France	98	4%	86%	3%	6%
	Denmark	95	19%	72%	9%	1%
	Germany	95	6%	87%	6%	0%
	Spain	93	1%	89%	4%	1%
	UK	93	4%	72%	12%	5%
	Netherlands	91	18%	62%	20%	1%
	Slovakia	91	16%	69%	12%	2%
	Sweden	91	18%	69%	10%	2%
	Italy	88	7%	80%	5%	1%
Countries (Top 3 websites)	Austria	3	33%	67%	0%	0%
	Belgium	3	33%	100%	0%	0%
	Czech Republic	3	33%	67%	0%	0%
	Denmark	3	67%	33%	0%	0%
	Estonia	3	0%	67%	33%	0%
	Finland	3	0%	100%	0%	0%
	France	3	0%	67%	0%	33%
	Germany	3	0%	100%	0%	0%
	Greece	3	0%	100%	0%	0%
	Hungary	3	0%	67%	33%	0%
	Ireland	3	0%	33%	67%	0%
	Latvia	3	33%	67%	0%	0%
	Lithuania	3	67%	33%	0%	0%
	Luxembourg	3	0%	67%	33%	0%
	Poland	3	0%	67%	33%	0%
	Portugal	3	33%	67%	0%	0%
	Slovakia	3	33%	33%	33%	0%
	Spain	3	0%	100%	0%	0%
	Sweden	3	0%	100%	0%	0%
	UK	3	0%	33%	33%	33%
	Croatia	2	0%	100%	0%	0%
	Italy	2	0%	50%	50%	0%
	Netherlands	2	0%	50%	50%	0%
	Slovenia	2	0%	100%	0%	0%
	Bulgaria	1	0%	100%	0%	0%
	Malta	1	100%	0%	0%	0%
	Cyprus	0	0%	0%	0%	0%
	Romania	0	0%	0%	0%	0%

Base: 974 (excluding websites with the ODR link on the homepage)

Table 21. Accessibility of the webpage with the ODR link from the homepage (by sector)

		Base	Section accessible via a link on the top of the homepage	Section accessible via a link on the bottom of the homepage	Section accessible via a menu on homepage	Not accessible via the homepage
Total		974	10%	79%	9%	2%
Sector	(Electrical) household appliances (incl. kitchenware)	65	8%	80%	11%	2%
	Air transport	21	14%	57%	33%	5%
	Antiques and collectables	2	0%	50%	50%	0%
	Baby and child articles	13	0%	92%	8%	0%
	Beauty, health and wellness goods	127	10%	83%	6%	1%
	Clothing, shoes and accessories	219	9%	86%	2%	3%
	Computer games and software	49	12%	76%	12%	2%
	Electronics and Computer Hardware	129	12%	81%	6%	0%
	Entertainment (books, magazines, paperwares, music and movies)	64	16%	80%	5%	0%
	FMCG	32	13%	69%	16%	3%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	9%	77%	11%	2%
	Insurances	11	18%	55%	18%	9%
	Multi-sector	25	16%	72%	12%	0%
	Online reservations of offline leisure	20	15%	80%	5%	0%
	Payment services	16	6%	69%	13%	13%
	Pet and animal products	14	0%	93%	7%	0%
	Spares and accessories for vehicles	28	11%	79%	11%	0%
	Sport & Leisure	12	33%	42%	25%	0%
	Telecom services (e.g. internet, mobile telephone services)	23	4%	65%	26%	4%
	Travel services	44	2%	86%	5%	7%
Utilities (e.g. electricity, gas, water, petrol)	7	0%	29%	71%	0%	

Base: 974 (excluding websites with the ODR link on the homepage)

Table 22. Accessibility of the webpage with the ODR link from the homepage (by trader size)

		Base	Section accessible via a link on the top of the homepage	Section accessible via a link on the bottom of the homepage	Section accessible via a menu on homepage	Not accessible via the homepage
Total		974	10%	79%	9%	2%
Size	Large-sized traders	622	8%	83%	8%	2%
	Medium-sized traders	253	15%	74%	10%	2%
	Small traders	99	13%	75%	11%	1%

Base: 974 (excluding websites with the ODR link on the homepage)

c) Did you have to scroll down a lot to reach the link to the section on the bottom of the homepage?

Table 23. Did you have to scroll down a lot to reach the link to the section on the bottom of the homepage? (by country)

		Base	No	Yes
Total		781	88%	12%
Countries (10 focus countries)	Poland	108	98%	2%
	Spain	85	71%	29%
	France	84	85%	15%
	Germany	83	72%	28%
	Italy	71	100%	0%
	Denmark	68	75%	25%
	UK	67	100%	0%
	Slovakia	63	100%	0%
	Sweden	63	95%	5%
	Netherlands	56	98%	2%
Countries (Top 3 websites)	Belgium	3	67%	33%
	Croatia	3	100%	0%
	Finland	3	67%	33%
	Germany	3	33%	67%
	Greece	3	67%	33%
	Spain	3	67%	33%
	Sweden	3	100%	0%
	Austria	2	0%	100%
	Czech Republic	2	50%	50%
	Estonia	2	50%	50%
	France	2	50%	50%
	Hungary	2	50%	50%
	Latvia	2	100%	0%
	Luxembourg	2	100%	0%
	Poland	2	100%	0%
	Portugal	2	50%	50%
	Romania	2	100%	0%
	Slovenia	2	50%	50%
	Bulgaria	1	100%	0%
	Denmark	1	0%	100%
	Ireland	1	100%	0%
	Italy	1	100%	0%
	Lithuania	1	0%	100%
	Netherlands	1	100%	0%
	Slovakia	1	100%	0%
	UK	1	100%	0%
Cyprus	0	0%	0%	
Malta	0	0%	0%	

Base: 781 (Websites with the link to the section with the ODR link on the bottom

of the homepage)

Table 24. Did you have to scroll down a lot to reach the link to the section on the bottom of the homepage? (by sector)

		Base	No	Yes
Total		781	88%	12%
Sectors	(Electrical) household appliances (incl. kitchenware)	53	92%	8%
	Air transport	12	92%	8%
	Antiques and collectables	1	0%	100%
	Baby and child articles	13	92%	8%
	Beauty, health and wellness goods	107	91%	9%
	Clothing, shoes and accessories	190	94%	6%
	Computer games and software	37	84%	16%
	Electronics and Computer Hardware	105	82%	18%
	Entertainment (books, magazines, paperwares, music and movies)	51	86%	14%
	FMCG	22	64%	36%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	41	83%	17%
	Insurances	6	100%	0%
	Multi-sector	19	68%	32%
	Online reservations of offline leisure	16	81%	19%
	Payment services	11	100%	0%
	Pet and animal products	13	100%	0%
	Spares and accessories for vehicles	22	95%	5%
	Sport & Leisure	5	80%	20%
	Telecom services (e.g. internet, mobile telephone services)	17	71%	29%
	Travel services	38	92%	8%
	Utilities (e.g. electricity, gas, water, petrol)	2	100%	0%

Base: 781 (Websites with the link to the section with the ODR link on the bottom of the homepage)

Table 25. Did you have to scroll down a lot to reach the link to the section on the bottom of the homepage? (by trader size)

		Base	No	Yes
Total		781	88%	12%
Size	Large-sized traders	521	86%	14%
	Medium-sized traders	186	94%	6%
	Small traders	74	86%	14%

Base: 781 (Websites with the link to the section with the ODR link on the bottom of the homepage)

d) Was the section accessible from most pages of the website?

Table 26. Was the section with the ODR link accessible from most pages of the website? (by country)

		Base	Certainly not	Rather not	Neutral	Rather yes	Certainly so
Total		974	5%	6%	6%	37%	45%
Countries (10 focus countries)	Poland	117	1%	2%	3%	27%	67%
	France	97	8%	1%	3%	15%	72%
	Denmark	95	9%	25%	1%	36%	28%
	Germany	95	2%	2%	7%	31%	58%
	Slovakia	91	2%	3%	4%	29%	62%
	Netherlands	90	8%	9%	18%	36%	30%
	Sweden	90	8%	7%	0%	77%	9%
	Spain	89	1%	4%	10%	78%	7%
	UK	87	8%	6%	8%	23%	55%
	Italy	81	6%	5%	1%	23%	64%
Countries (Top 3 websites)	Austria	3	33%	0%	0%	0%	67%
	Belgium	3	0%	0%	0%	33%	67%
	Czech Republic	3	0%	0%	0%	33%	67%
	Denmark	3	33%	33%	0%	0%	33%
	Estonia	3	0%	0%	33%	33%	33%
	Finland	3	0%	0%	0%	67%	33%
	France	3	33%	0%	0%	0%	67%
	Germany	3	0%	33%	33%	0%	33%
	Greece	3	0%	0%	0%	67%	33%
	Hungary	3	0%	67%	0%	0%	33%
	Ireland	3	0%	33%	33%	33%	0%
	Latvia	3	0%	0%	0%	67%	33%
	Lithuania	3	0%	0%	0%	100%	0%
	Luxembourg	3	0%	33%	0%	0%	67%
	Poland	3	0%	33%	0%	67%	0%
	Portugal	3	0%	0%	0%	67%	33%
	Slovakia	3	0%	33%	0%	33%	33%
	Spain	3	0%	0%	0%	100%	0%
	Sweden	3	0%	0%	0%	67%	33%
	UK	3	33%	33%	0%	0%	33%
	Croatia	2	0%	0%	0%	0%	100%
	Italy	2	50%	0%	0%	0%	50%
	Netherlands	2	0%	0%	50%	50%	0%
	Slovenia	2	0%	0%	100%	0%	0%
	Bulgaria	1	0%	0%	0%	100%	0%
	Malta	1	0%	0%	100%	0%	0%
Cyprus	0	0%	0%	0%	0%	0%	
Romania	0	0%	0%	0%	0%	0%	

Base: 974 (excluding websites with the ODR link on the homepage)

Table 27. Was the section with the ODR link accessible from most pages of the website? (by sector)

		Base	Certainly not	Rather not	Neutral	Rather yes	Certainly so
Total		974	5%	6%	6%	37%	45%
Sectors	(Electrical) household appliances (incl. kitchenware)	65	2%	6%	6%	34%	52%
	Air transport	21	19%	14%	14%	38%	14%
	Antiques and collectables	2	0%	0%	0%	0%	100%
	Baby and child articles	13	8%	0%	8%	38%	46%
	Beauty, health and wellness goods	127	3%	6%	5%	41%	45%
	Clothing, shoes and accessories	219	4%	6%	5%	33%	53%
	Computer games and software	49	4%	4%	4%	37%	51%
	Electronics and Computer Hardware	129	2%	6%	5%	35%	52%
	Entertainment (books, magazines, paperwares, music and movies)	64	3%	2%	3%	36%	56%
	FMCG	32	9%	9%	6%	44%	31%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	4%	11%	9%	49%	26%
	Insurances	11	9%	9%	0%	27%	55%
	Multi-sector	25	12%	12%	4%	52%	20%
	Online reservations of offline leisure	20	0%	5%	5%	55%	35%
	Payment services	16	25%	13%	6%	31%	25%
	Pet and animal products	14	7%	0%	0%	50%	43%
	Spares and accessories for vehicles	28	0%	4%	0%	32%	64%
	Sport & Leisure	12	0%	8%	17%	33%	42%
	Telecom services (e.g. internet, mobile telephone services)	23	22%	17%	9%	26%	26%
	Travel services	44	7%	5%	14%	39%	36%
Utilities (e.g. electricity, gas, water, petrol)	7	57%	0%	29%	0%	14%	

Base: 974 (excluding websites with the ODR link on the homepage)

Table 28. Was the section with the ODR link accessible from most pages of the website? (by trader size)

		Base	Certainly not	Rather not	Neutral	Rather yes	Certainly so
Total		974	5%	6%	6%	37%	45%
Size	Large-sized traders	622	5%	6%	8%	38%	43%
	Medium-sized traders	253	5%	8%	3%	32%	52%
	Small traders	99	4%	4%	3%	45%	43%

Base: 974 (excluding websites with the ODR link on the homepage)

e) How was the link to the ODR platform presented?

Table 29. How was the link to the ODR platform presented? (by country)

		Base	Presented as the exact link to the ODR platform	Hyperlink under text	Presented as a banner	Other
Total		1,005	91%	8%	0%	0%
Countries (10 focus countries)	Poland	120	98%	2%	0%	0%
	France	98	87%	13%	0%	0%
	Denmark	95	99%	1%	0%	0%
	Germany	95	94%	6%	0%	0%
	Spain	93	95%	5%	0%	0%
	UK	93	76%	24%	0%	0%
	Netherlands	91	93%	7%	0%	0%
	Slovakia	91	90%	9%	0%	1%
	Sweden	91	97%	2%	0%	1%
	Italy	88	82%	16%	2%	0%
Countries (Top 3 websites)	Austria	3	100%	0%	0%	0%
	Belgium	3	100%	0%	0%	0%
	Bulgaria	3	67%	33%	0%	0%
	Croatia	3	33%	67%	0%	0%
	Czech Republic	3	67%	0%	0%	33%
	Denmark	3	100%	0%	0%	0%
	Estonia	3	100%	0%	0%	0%
	Finland	3	100%	0%	0%	0%
	France	3	100%	0%	0%	0%
	Germany	3	67%	33%	0%	0%
	Greece	3	100%	0%	0%	0%
	Hungary	3	100%	0%	0%	0%
	Ireland	3	67%	33%	0%	0%
	Italy	3	67%	33%	0%	0%
	Latvia	3	100%	0%	0%	0%
	Lithuania	3	100%	0%	0%	0%
	Luxembourg	3	100%	0%	0%	0%
	Netherlands	3	100%	0%	0%	0%
	Poland	3	100%	0%	0%	0%
	Portugal	3	100%	0%	0%	0%
	Romania	3	33%	67%	0%	0%
	Slovakia	3	33%	67%	0%	0%
	Slovenia	3	100%	0%	0%	0%
	Spain	3	100%	0%	0%	0%
Sweden	3	100%	0%	0%	0%	
UK	3	100%	0%	0%	0%	
Cyprus	1	0%	0%	100%	0%	

	Malta	1	100%	0%	0%	0%
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Base: 1,005 (all investigated websites)

Table 30. How was the link to the ODR platform presented? (by sector)

		Base	Presented as the exact link to the ODR platform	Hyperlink under text	Presented as a banner	Other
Total		1,005	91%	8%	0%	0%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	91%	7%	1%	0%
	Air transport	21	90%	10%	0%	0%
	Antiques and collectables	2	50%	50%	0%	0%
	Baby and child articles	14	100%	0%	0%	0%
	Beauty, health and wellness goods	132	91%	8%	1%	0%
	Clothing, shoes and accessories	223	89%	10%	0%	1%
	Computer games and software	49	96%	2%	2%	0%
	Electronics and Computer Hardware	133	90%	10%	0%	0%
	Entertainment (books, magazines, paperwares, music and movies)	66	95%	3%	0%	2%
	FMCG	32	94%	6%	0%	0%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	92%	8%	0%	0%
	Insurances	11	91%	9%	0%	0%
	Multi-sector	29	93%	7%	0%	0%
	Online reservations of offline leisure	20	85%	15%	0%	0%
	Payment services	16	88%	13%	0%	0%
	Pet and animal products	14	93%	7%	0%	0%
	Spares and accessories for vehicles	28	100%	0%	0%	0%
	Sport & Leisure	12	83%	17%	0%	0%
	Telecom services (e.g. internet, mobile telephone services)	29	69%	31%	0%	0%
	Travel services	46	96%	4%	0%	0%
Utilities (e.g. electricity, gas, water, petrol)	7	100%	0%	0%	0%	

Base: 1,005 (all investigated websites)

Table 31. How was the link to the ODR platform presented? (by trader size)

		Base	Presented as the exact link to the ODR platform	Hyperlink under text	Presented as a banner	Other
Total		1,005	91%	8%	0%	0%
Size	Large-sized traders	648	89%	10%	0%	0%
	Medium-sized traders	257	93%	6%	0%	1%
	Small traders	100	95%	4%	1%	0%

Base: 1,005 (all investigated websites)

f) Was the link underlined

Table 32. Was the link underlined? (by country)

		Base	Yes	No
Total		1,002	34%	66%
Countries (10 focus countries)	Poland	120	17%	83%
	France	98	41%	59%
	Denmark	95	35%	65%
	Germany	95	38%	62%
	Spain	93	31%	69%
	UK	93	41%	59%
	Netherlands	91	35%	65%
	Slovakia	91	41%	59%
	Sweden	91	26%	74%
	Italy	86	33%	67%
Countries (Top 3 websites)	Austria	3	33%	67%
	Belgium	3	67%	33%
	Bulgaria	3	33%	67%
	Croatia	3	33%	67%
	Czech Republic	3	67%	33%
	Denmark	3	67%	33%
	Estonia	3	67%	33%
	Finland	3	67%	33%
	France	3	33%	67%
	Germany	3	0%	100%
	Greece	3	33%	67%
	Hungary	3	67%	33%
	Ireland	3	100%	0%
	Italy	3	67%	33%
	Latvia	3	100%	0%
	Lithuania	3	33%	67%
	Luxembourg	3	33%	67%
	Netherlands	3	0%	100%
	Poland	3	0%	100%
	Portugal	3	0%	100%
	Romania	3	0%	100%
	Slovakia	3	33%	67%
	Slovenia	3	33%	67%
	Spain	3	0%	100%
	Sweden	3	67%	33%
UK	3	67%	33%	
Malta	1	0%	100%	
Cyprus	0	0%	0%	

Base: 1,002 (excluding websites where the link is presented as a banner)

Table 33. Was the link underlined? (by sector)

		Base	Yes	No
Total		1,002	34%	66%
Sectors	(Electrical) household appliances (incl. kitchenware)	67	36%	64%
	Air transport	21	29%	71%
	Antiques and collectables	2	100%	0%
	Baby and child articles	14	21%	79%
	Beauty, health and wellness goods	131	38%	62%
	Clothing, shoes and accessories	223	33%	67%
	Computer games and software	48	31%	69%
	Electronics and Computer Hardware	133	33%	67%
	Entertainment (books, magazines, paperwares, music and movies)	66	26%	74%
	FMCG	32	38%	63%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	28%	72%
	Insurances	11	27%	73%
	Multi-sector	29	34%	66%
	Online reservations of offline leisure	20	50%	50%
	Payment services	16	56%	44%
	Pet and animal products	14	0%	100%
	Spares and accessories for vehicles	28	36%	64%
	Sport & Leisure	12	25%	75%
	Telecom services (e.g. internet, mobile telephone services)	29	41%	59%
	Travel services	46	41%	59%
Utilities (e.g. electricity, gas, water, petrol)	7	43%	57%	

Base: 1,002 (excluding websites where the link is presented as a banner)

Table 34. Was the link underlined? (by trader size)

		Base	Yes	No
Total		1,002	34%	66%
Size	Large-sized traders	646	35%	65%
	Medium-sized traders	257	33%	67%
	Small traders	99	26%	74%

Base: 1,002 (excluding websites where the link is presented as a banner)

g) Is the link clearly highlighted/underlined when hovered over it with the mouse?

Table 35. Is the link clearly highlighted/underlined when you hover over it with your mouse? (by country)

		Base	Yes	No
Total		1,002	52%	48%
Countries (10 focus countries)	Poland	120	40%	60%
	France	98	43%	57%
	Denmark	95	64%	36%
	Germany	95	59%	41%
	Spain	93	41%	59%
	UK	93	56%	44%
	Netherlands	91	52%	48%
	Slovakia	91	45%	55%
	Sweden	91	51%	49%
	Italy	86	60%	40%
Countries (Top 3 websites)	Austria	3	67%	33%
	Belgium	3	67%	33%
	Bulgaria	3	67%	33%
	Croatia	3	67%	33%
	Czech Republic	3	100%	0%
	Denmark	3	67%	33%
	Estonia	3	67%	33%
	Finland	3	100%	0%
	France	3	33%	67%
	Germany	3	100%	0%
	Greece	3	67%	33%
	Hungary	3	33%	67%
	Ireland	3	100%	0%
	Italy	3	33%	67%
	Latvia	3	100%	0%
	Lithuania	3	67%	33%
	Luxembourg	3	67%	33%
	Netherlands	3	100%	0%
	Poland	3	100%	0%
	Portugal	3	33%	67%
	Romania	3	67%	33%
	Slovakia	3	33%	67%
	Slovenia	3	100%	0%
	Spain	3	100%	0%
	Sweden	3	0%	100%
	UK	3	67%	33%
	Malta	1	100%	0%
Cyprus	0	0%	0%	

Base: 1,002 (excluding websites where the link is presented as a banner)

Table 36. Is the link clearly highlighted/underlined when you hover over it with your mouse? (by sector)

		Base	Yes	No
Total		1,002	52%	48%
Sectors	(Electrical) household appliances (incl. kitchenware)	67	57%	43%
	Air transport	21	38%	62%
	Antiques and collectables	2	0%	100%
	Baby and child articles	14	43%	57%
	Beauty, health and wellness goods	131	52%	48%
	Clothing, shoes and accessories	223	46%	54%
	Computer games and software	48	52%	48%
	Electronics and Computer Hardware	133	49%	51%
	Entertainment (books, magazines, paperwares, music and movies)	66	62%	38%
	FMCG	32	53%	47%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	47%	53%
	Insurances	11	55%	45%
	Multi-sector	29	62%	38%
	Online reservations of offline leisure	20	55%	45%
	Payment services	16	56%	44%
	Pet and animal products	14	79%	21%
	Spares and accessories for vehicles	28	54%	46%
	Sport & Leisure	12	67%	33%
	Telecom services (e.g. internet, mobile telephone services)	29	55%	45%
	Travel services	46	52%	48%
Utilities (e.g. electricity, gas, water, petrol)	7	71%	29%	

Base: 1,002 (excluding websites where the link is presented as a banner)

Table 37. Is the link clearly highlighted/underlined when you hover over it with your mouse? (by trader size)

		Base	Yes	No
Total		1,002	52%	48%
Size	Large-sized traders	646	53%	47%
	Medium-sized traders	257	51%	49%
	Small traders	99	47%	53%

Base: 1,002 (excluding websites where the link is presented as a banner)

h) Is the link clearly highlighted when navigated to with the keyboard?

Table 38. Is the link clearly highlighted when you navigate to it using your keyboard (use the tab key to jump from link to link on the webpage)? (by country)

		Base	Yes	No
Total		995	57%	43%
Countries (10 focus countries)	Poland	120	63%	38%
	France	98	12%	88%
	Germany	95	91%	9%
	Denmark	95	63%	37%
	UK	93	85%	15%
	Spain	92	34%	66%
	Sweden	91	49%	51%
	Slovakia	90	70%	30%
	Netherlands	88	50%	50%
	Italy	85	42%	58%
Countries (Top 3 websites)	Austria	3	67%	33%
	Belgium	3	100%	0%
	Bulgaria	3	67%	33%
	Croatia	3	67%	33%
	Czech Republic	3	67%	33%
	Denmark	3	67%	33%
	Estonia	3	33%	67%
	Finland	3	100%	0%
	France	3	0%	100%
	Germany	3	100%	0%
	Greece	3	33%	67%
	Hungary	3	67%	33%
	Ireland	3	100%	0%
	Italy	3	67%	33%
	Latvia	3	100%	0%
	Lithuania	3	67%	33%
	Netherlands	3	33%	67%
	Poland	3	100%	0%
	Portugal	3	33%	67%
	Romania	3	67%	33%
	Slovakia	3	67%	33%
	Slovenia	3	100%	0%
	Spain	3	67%	33%
	Sweden	3	0%	100%
UK	3	100%	0%	
Luxembourg	2	100%	0%	
Malta	1	100%	0%	
Cyprus	0	0%	0%	

Base: 995 (excluding websites where the link is presented as a banner)

Table 39. Is the link clearly highlighted when you navigate to it using your keyboard (use the tab key to jump from link to link on the webpage)? (by sector)

		Base	Yes	No
Total		995	57%	43%
Sectors	(Electrical) household appliances (incl. kitchenware)	67	64%	36%
	Air transport	20	50%	50%
	Antiques and collectables	2	50%	50%
	Baby and child articles	14	21%	79%
	Beauty, health and wellness goods	131	60%	40%
	Clothing, shoes and accessories	223	48%	52%
	Computer games and software	48	54%	46%
	Electronics and Computer Hardware	131	59%	41%
	Entertainment (books, magazines, paperwares, music and movies)	65	63%	37%
	FMCG	32	53%	47%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	52	56%	44%
	Insurances	11	82%	18%
	Multi-sector	29	69%	31%
	Online reservations of offline leisure	20	70%	30%
	Payment services	16	63%	38%
	Pet and animal products	14	79%	21%
	Spares and accessories for vehicles	28	57%	43%
	Sport & Leisure	12	33%	67%
	Telecom services (e.g. internet, mobile telephone services)	29	59%	41%
	Travel services	46	65%	35%
Utilities (e.g. electricity, gas, water, petrol)	5	80%	20%	

Base: 995 (excluding websites where the link is presented as a banner)

Table 40. Is the link clearly highlighted when you navigate to it using your keyboard (use the tab key to jump from link to link on the webpage)? (by trader size)

		Base	Yes	No
Total		995	57%	43%
Size	Large-sized traders	642	55%	45%
	Medium-sized traders	255	59%	41%
	Small traders	98	63%	37%

Base: 995 (excluding websites where the link is presented as a banner)

i) Is the the link/banner clickable?

Table 41. Is the link/banner clickable? (by country)

		Base	Yes	No
Total		1,005	82%	18%
Countries (10 focus countries)	Poland	120	67%	33%
	France	98	82%	18%
	Denmark	95	83%	17%
	Germany	95	94%	6%
	Spain	93	80%	20%
	UK	93	87%	13%
	Netherlands	91	87%	13%
	Slovakia	91	75%	25%
	Sweden	91	78%	22%
	Italy	88	90%	10%
Countries (Top 3 websites)	Austria	3	100%	0%
	Belgium	3	100%	0%
	Bulgaria	3	100%	0%
	Croatia	3	100%	0%
	Czech Republic	3	100%	0%
	Denmark	3	67%	33%
	Estonia	3	67%	33%
	Finland	3	100%	0%
	France	3	100%	0%
	Germany	3	100%	0%
	Greece	3	67%	33%
	Hungary	3	100%	0%
	Ireland	3	100%	0%
	Italy	3	100%	0%
	Latvia	3	100%	0%
	Lithuania	3	67%	33%
	Luxembourg	3	100%	0%
	Netherlands	3	100%	0%
	Poland	3	100%	0%
	Portugal	3	33%	67%
	Romania	3	100%	0%
	Slovakia	3	67%	33%
	Slovenia	3	100%	0%
Spain	3	100%	0%	
Sweden	3	67%	33%	
UK	3	100%	0%	
Cyprus	1	100%	0%	
Malta	1	100%	0%	

Base: 1,005 (all investigated websites)

Table 42. Is the link/banner clickable? (by sector)

		Base	Yes	No
Total		1,005	82%	18%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	85%	15%
	Air transport	21	100%	0%
	Antiques and collectables	2	100%	0%
	Baby and child articles	14	79%	21%
	Beauty, health and wellness goods	132	80%	20%
	Clothing, shoes and accessories	223	79%	21%
	Computer games and software	49	78%	22%
	Electronics and Computer Hardware	133	81%	19%
	Entertainment (books, magazines, paperwares, music and movies)	66	80%	20%
	FMCG	32	81%	19%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	81%	19%
	Insurances	11	91%	9%
	Multi-sector	29	90%	10%
	Online reservations of offline leisure	20	90%	10%
	Payment services	16	94%	6%
	Pet and animal products	14	86%	14%
	Spares and accessories for vehicles	28	75%	25%
	Sport & Leisure	12	67%	33%
	Telecom services (e.g. internet, mobile telephone services)	29	90%	10%
	Travel services	46	85%	15%
Utilities (e.g. electricity, gas, water, petrol)	7	100%	0%	

Base: 1,005 (all investigated websites)

Table 43. Is the link/banner clickable? (by trader size)

		Base	Yes	No
Total		1,005	82%	18%
Size	Large-sized traders	648	83%	17%
	Medium-sized traders	257	79%	21%
	Small traders	100	85%	15%

Base: 1,005 (all investigated websites)

j) Does the link work correctly?

Table 44. Does the link work correctly (do you arrive at the ODR platform when clicking the link/banner)? (by country)

		Base	Yes	No
Total		825	100%	0%
Countries (10 focus countries)	Germany	89	99%	1%
	UK	81	100%	0%
	France	80	100%	0%
	Poland	80	100%	0%
	Denmark	79	100%	0%
	Italy	79	100%	0%
	Netherlands	79	100%	0%
	Spain	74	100%	0%
	Sweden	71	100%	0%
	Slovakia	68	99%	1%
Countries (Top 3 websites)	Austria	3	100%	0%
	Belgium	3	100%	0%
	Bulgaria	3	100%	0%
	Croatia	3	100%	0%
	Czech Republic	3	67%	33%
	Finland	3	100%	0%
	France	3	100%	0%
	Germany	3	100%	0%
	Hungary	3	100%	0%
	Ireland	3	100%	0%
	Italy	3	100%	0%
	Latvia	3	100%	0%
	Luxembourg	3	100%	0%
	Netherlands	3	100%	0%
	Poland	3	100%	0%
	Romania	3	100%	0%
	Slovenia	3	100%	0%
	Spain	3	100%	0%
	UK	3	1	0
	Denmark	2	1	0
	Estonia	2	1	0
	Greece	2	1	0
	Lithuania	2	1	0
Slovakia	2	1	0	
Sweden	2	1	0	
Cyprus	1	1	0	
Malta	1	1	0	
Portugal	1	1	0	

Base: 825 (websites with a clickable link/banner)

Table 45. Does the link work correctly (do you arrive at the ODR platform when clicking the link/banner)? (by sector)

		Base	Yes	No
Total		825	100%	0%
Sectors	(Electrical) household appliances (incl. kitchenware)	58	100%	0%
	Air transport	21	100%	0%
	Antiques and collectables	2	100%	0%
	Baby and child articles	11	100%	0%
	Beauty, health and wellness goods	106	100%	0%
	Clothing, shoes and accessories	177	100%	0%
	Computer games and software	38	100%	0%
	Electronics and Computer Hardware	108	99%	1%
	Entertainment (books, magazines, paperwares, music and movies)	53	98%	2%
	FMCG	26	100%	0%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	43	100%	0%
	Insurances	10	100%	0%
	Multi-sector	26	100%	0%
	Online reservations of offline leisure	18	100%	0%
	Payment services	15	100%	0%
	Pet and animal products	12	92%	8%
	Spares and accessories for vehicles	21	100%	0%
	Sport & Leisure	8	100%	0%
	Telecom services (e.g. internet, mobile telephone services)	26	100%	0%
	Travel services	39	100%	0%
	Utilities (e.g. electricity, gas, water, petrol)	7	100%	0%

Base: 825 (websites with a clickable link/banner)

Table 46. Does the link work correctly (do you arrive at the ODR platform when clicking the link/banner)? (by trader size)

		Base	Yes	No
Total		825	100%	0%
Size	Large-sized traders	538	100%	0%
	Medium-sized traders	202	100%	0%
	Small traders	85	98%	2%

Base: 825 (websites with a clickable link/banner)

k) Is there an introductory phrase/context accompanying the link/banner?

Table 47. Is there an introductory phrase/context accompanying the link/banner? (by country)

		Base	Yes	No
Total		1,005	91%	9%
Countries (10 focus countries)	Poland	120	99%	1%
	France	98	91%	9%
	Denmark	95	92%	8%
	Germany	95	100%	0%
	Spain	93	96%	4%
	UK	93	91%	9%
	Netherlands	91	98%	2%
	Slovakia	91	99%	1%
	Sweden	91	55%	45%
	Italy	88	88%	13%
Countries (Top 3 websites)	Austria	3	67%	33%
	Belgium	3	100%	0%
	Bulgaria	3	33%	67%
	Croatia	3	67%	33%
	Czech Republic	3	100%	0%
	Denmark	3	100%	0%
	Estonia	3	100%	0%
	Finland	3	100%	0%
	France	3	100%	0%
	Germany	3	100%	0%
	Greece	3	100%	0%
	Hungary	3	100%	0%
	Ireland	3	100%	0%
	Italy	3	67%	33%
	Latvia	3	100%	0%
	Lithuania	3	100%	0%
	Luxembourg	3	100%	0%
	Netherlands	3	67%	33%
	Poland	3	100%	0%
	Portugal	3	100%	0%
	Romania	3	0%	100%
	Slovakia	3	100%	0%
	Slovenia	3	100%	0%
	Spain	3	100%	0%
	Sweden	3	33%	67%
	UK	3	100%	0%
	Cyprus	1	0%	100%
Malta	1	100%	0%	

Base: 1,005 (all investigated websites)

Table 48. Is there an introductory phrase/context accompanying the link/banner? (by sector)

		Base	Yes	No
Total		1,005	91%	9%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	93%	7%
	Air transport	21	100%	0%
	Antiques and collectables	2	100%	0%
	Baby and child articles	14	100%	0%
	Beauty, health and wellness goods	132	89%	11%
	Clothing, shoes and accessories	223	91%	9%
	Computer games and software	49	92%	8%
	Electronics and Computer Hardware	133	92%	8%
	Entertainment (books, magazines, paperwares, music and movies)	66	95%	5%
	FMCG	32	84%	16%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	89%	11%
	Insurances	11	91%	9%
	Multi-sector	29	83%	17%
	Online reservations of offline leisure	20	90%	10%
	Payment services	16	94%	6%
	Pet and animal products	14	93%	7%
	Spares and accessories for vehicles	28	96%	4%
	Sport & Leisure	12	83%	17%
	Telecom services (e.g. internet, mobile telephone services)	29	69%	31%
	Travel services	46	93%	7%
Utilities (e.g. electricity, gas, water, petrol)	7	100%	0%	

Base: 1,005 (all investigated websites)

Table 49. Is there an introductory phrase/context accompanying the link/banner? (by trader size)

		Base	Yes	No
Total		1,005	91%	9%
Size	Large-sized traders	653	90%	10%
	Medium-sized traders	259	93%	7%
	Small traders	100	90%	10%

Base: 1,005 (all investigated websites)

l) Do you perceive the introductory text as clear and explanatory?

Table 48. Do you perceive the introductory text as clear and explanatory? (by country)

		Base	Yes	No
Total		918	83%	17%
Countries (10 focus countries)	Poland	119	95%	5%
	Germany	95	69%	31%
	Slovakia	90	99%	1%
	Spain	89	100%	0%
	Netherlands	89	93%	7%
	France	89	82%	18%
	Denmark	87	66%	34%
	UK	85	94%	6%
	Italy	77	73%	27%
	Sweden	50	34%	66%
Countries (Top 3 websites)	Belgium	3	100%	0%
	Czech Republic	3	67%	33%
	Denmark	3	67%	33%
	Estonia	3	67%	33%
	Finland	3	100%	0%
	France	3	100%	0%
	Germany	3	100%	0%
	Greece	3	33%	67%
	Hungary	3	67%	33%
	Ireland	3	100%	0%
	Latvia	3	100%	0%
	Lithuania	3	100%	0%
	Luxembourg	3	100%	0%
	Poland	3	100%	0%
	Portugal	3	100%	0%
	Slovakia	3	100%	0%
	Slovenia	3	100%	0%
	Spain	3	100%	0%
	UK	3	100%	0%
	Austria	2	50%	50%
	Croatia	2	100%	0%
	Italy	2	50%	50%
	Netherlands	2	100%	0%
Bulgaria	1	100%	0%	
Malta	1	100%	0%	
Sweden	1	0%	100%	
Cyprus	0	0%	0%	
Romania	0	0%	0%	

Base: 918 (websites with an introductory text)

Table 49. Do you perceive the introductory text as clear and explanatory? (by sector)

		Base	Yes	No
Total		912	83%	17%
Sectors	(Electrical) household appliances (incl. kitchenware)	63	94%	6%
	Air transport	21	86%	14%
	Antiques and collectables	2	50%	50%
	Baby and child articles	14	86%	14%
	Beauty, health and wellness goods	117	82%	18%
	Clothing, shoes and accessories	204	82%	18%
	Computer games and software	45	96%	4%
	Electronics and Computer Hardware	122	84%	16%
	Entertainment (books, magazines, paperwares, music and movies)	63	75%	25%
	FMCG	27	78%	22%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	47	83%	17%
	Insurances	10	100%	0%
	Multi-sector	24	92%	8%
	Online reservations of offline leisure	18	72%	28%
	Payment services	15	80%	20%
	Pet and animal products	13	85%	15%
	Spares and accessories for vehicles	27	81%	19%
	Sport & Leisure	10	90%	10%
	Telecom services (e.g. internet, mobile telephone services)	20	85%	15%
	Travel services	43	70%	30%
Utilities (e.g. electricity, gas, water, petrol)	7	86%	14%	

Base: 912 (websites with an introductory text)

Table 50. Do you perceive the introductory text as clear and explanatory? (by trader size)

		Base	Yes	No
Total		912	83%	17%
Size	Large-sized traders	583	87%	13%
	Medium-sized traders	239	77%	23%
	Small traders	90	76%	24%

Base: 912 (websites with an introductory text)

m) Is there a statement from the trader/marketplace on whether they plan to use the platform?

Table 51. Is there a statement from the trader/marketplace on whether they plan to use the platform? (by country)

		Base	Yes	No
Total		1,005	49%	51%
Countries (10 focus countries)	Poland	120	98%	3%
	France	98	17%	83%
	Denmark	95	48%	52%
	Germany	95	69%	31%
	Spain	93	58%	42%
	UK	93	83%	17%
	Netherlands	91	7%	93%
	Slovakia	91	82%	18%
	Sweden	91	8%	92%
	Italy	88	33%	67%
Countries (Top 3 websites)	Austria	3	0%	100%
	Belgium	3	0%	100%
	Bulgaria	3	0%	100%
	Croatia	3	0%	100%
	Czech Republic	3	0%	100%
	Denmark	3	67%	33%
	Estonia	3	0%	100%
	Finland	3	0%	100%
	France	3	33%	67%
	Germany	3	67%	33%
	Greece	3	0%	100%
	Hungary	3	0%	100%
	Ireland	3	0%	100%
	Italy	3	33%	67%
	Latvia	3	33%	67%
	Lithuania	3	0%	100%
	Luxembourg	3	0%	100%
	Netherlands	3	0%	100%
	Poland	3	100%	0%
	Portugal	3	0%	100%
	Romania	3	0%	100%
	Slovakia	3	100%	0%
	Slovenia	3	0%	100%
	Spain	3	100%	0%
	Sweden	3	33%	67%
	UK	3	100%	0%
	Cyprus	1	0%	100%
Malta	1	100%	0%	

Base: 1,005 (all investigated websites)

Table 52. Is there a statement from the trader/marketplace on whether they plan to use the platform? (by sector)

		Base	Yes	No
Total		1,005	49%	51%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	49%	51%
	Air transport	21	29%	71%
	Antiques and collectables	2	50%	50%
	Baby and child articles	14	57%	43%
	Beauty, health and wellness goods	132	55%	45%
	Clothing, shoes and accessories	223	53%	47%
	Computer games and software	49	43%	57%
	Electronics and Computer Hardware	133	53%	47%
	Entertainment (books, magazines, paperwares, music and movies)	66	52%	48%
	FMCG	32	41%	59%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	45%	55%
	Insurances	11	82%	18%
	Multi-sector	29	34%	66%
	Online reservations of offline leisure	20	40%	60%
	Payment services	16	31%	69%
	Pet and animal products	14	57%	43%
	Spares and accessories for vehicles	28	71%	29%
	Sport & Leisure	12	33%	67%
	Telecom services (e.g. internet, mobile telephone services)	29	31%	69%
	Travel services	46	43%	57%
Utilities (e.g. electricity, gas, water, petrol)	7	43%	57%	

Base: 1,005 (all investigated websites)

Table 53. Is there a statement from the trader/marketplace on whether they plan to use the platform? (by trader size)

		Base	Yes	No
Total		1,005	49%	51%
Size	Large-sized traders	648	47%	53%
	Medium-sized traders	257	56%	44%
	Small traders	100	48%	52%

Base: 1,005 (all investigated websites)

n) Trader statements to (not) use the ODR platform

Table 54. Trader statements to (not) use the ODR platform (by country)

		Base	The trader will use the ODR	The trader will NOT use the ODR	Neutral statement
Total		497	68%	18%	14%
Countries (10 focus countries)	Poland	117	3%	74%	22%
	UK	77	5%	73%	22%
	Slovakia	75	3%	96%	1%
	Germany	66	92%	8%	0%
	Spain	54	9%	65%	26%
	Denmark	46	2%	96%	2%
	Italy	29	10%	79%	10%
	France	17	24%	47%	29%
	Sweden	7	29%	71%	0%
	Netherlands	6	33%	33%	33%
	Denmark	2	0%	100%	0%
	France	1	0%	0%	100%
	Germany	2	100%	0%	0%
	Hungary	1	0%	100%	0%
	Italy	1	0%	100%	0%
	Latvia	1	0%	100%	0%
	Malta	1	100%	0%	0%
	Poland	3	0%	100%	0%
	Slovakia	3	0%	100%	0%
	Spain	3	0%	33%	67%
	Sweden	1	0%	100%	0%
	UK	3	0%	67%	33%

Base: 497 (websites that included a statement on whether or not they plan to use the ODR platform)

Table 55. Trader statements to (not) use the ODR platform (by sector)

		Base	The trader will use the ODR	The trader will NOT use the ODR	Neutral statement
Total		497	68%	18%	14%
Sectors	(Electrical) household appliances (incl. kitchenware)	33	18%	64%	18%
	Air transport	6	17%	67%	17%
	Antiques and collectables	1	0%	100%	0%
	Baby and child articles	8	0%	63%	38%
	Beauty, health and wellness goods	72	14%	81%	6%
	Clothing, shoes and accessories	118	21%	64%	15%

Computer games and software	21	19%	62%	19%
Electronics and Computer Hardware	70	13%	67%	20%
Entertainment (books, magazines, paperwares, music and movies)	34	21%	71%	9%
FMCG	13	31%	69%	0%
Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	24	8%	83%	8%
Insurances	9	11%	78%	11%
Multi-sector	11	18%	73%	9%
Online reservations of offline leisure	8	50%	50%	0%
Payment services	5	0%	80%	20%
Pet and animal products	8	38%	63%	0%
Spares and accessories for vehicles	20	5%	60%	35%
Sport & Leisure	4	0%	100%	0%
Telecom services (e.g. internet, mobile telephone services)	9	11%	78%	11%
Travel services	20	45%	45%	10%
Utilities (e.g. electricity, gas, water, petrol)	3	0%	67%	33%

Base: 497 (websites that included a statement on whether or not they plan to use the ODR platform)

Table 56. Trader statements to (not) use the ODR platform (by trader size)

		Base	The trader will use the ODR	The trader will NOT use the ODR	Neutral statement
Total		497	68%	18%	14%
Size	Large traders	306	19%	66%	15%
	Medium-sized traders	143	10%	76%	14%
	Small traders	48	31%	63%	6%

Base: 497 (websites that included a statement on whether or not they plan to use the ODR platform)

o) The perceived ease of finding the ODR link

Table 57. The perceived ease of finding the ODR link (by country)

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		1,005	2%	9%	14%	43%	32%
Countries (10 focus countries)	Poland	120	3%	6%	27%	48%	17%
	France	98	2%	14%	10%	42%	32%
	Denmark	95	1%	16%	3%	76%	4%
	Germany	95	0%	2%	5%	18%	75%
	Spain	93	1%	9%	17%	59%	14%
	UK	93	3%	5%	20%	22%	49%
	Netherlands	91	2%	15%	22%	31%	30%
	Slovakia	91	0%	7%	13%	24%	56%
	Sweden	91	1%	8%	1%	88%	2%
	Italy	88	5%	14%	13%	27%	42%
Countries (Top 3 websites)	Austria	3	0%	0%	33%	67%	0%
	Belgium	3	0%	0%	0%	33%	67%
	Bulgaria	3	0%	0%	33%	67%	0%
	Croatia	3	0%	0%	0%	67%	33%
	Czech Republic	3	0%	0%	0%	100%	0%
	Denmark	3	0%	33%	33%	0%	33%
	Estonia	3	0%	0%	33%	33%	33%
	Finland	3	0%	67%	0%	33%	0%
	France	3	0%	33%	0%	33%	33%
	Germany	3	0%	33%	33%	33%	0%
	Greece	3	0%	0%	0%	67%	33%
	Hungary	3	33%	0%	0%	33%	33%
	Ireland	3	0%	0%	100%	0%	0%
	Italy	3	0%	33%	0%	0%	67%
	Latvia	3	0%	0%	67%	0%	33%
	Lithuania	3	0%	0%	33%	0%	67%
	Luxembourg	3	0%	0%	33%	0%	67%
	Netherlands	3	0%	0%	0%	67%	33%
	Poland	3	0%	0%	67%	0%	33%
	Portugal	3	0%	33%	0%	67%	0%
	Romania	3	0%	0%	0%	67%	33%
	Slovakia	3	0%	67%	0%	33%	0%
	Slovenia	3	0%	0%	0%	33%	67%
Spain	3	0%	0%	33%	0%	67%	
Sweden	3	0%	0%	0%	0%	100%	
UK	3	33%	33%	0%	33%	0%	
Cyprus	1	0%	100%	0%	0%	0%	
Malta	1	0%	0%	100%	0%	0%	

Base: 1,005 (all investigated websites)

Table 58. The perceived ease of finding the ODR link (by sector)

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		1,005	2%	9%	14%	43%	32%
Sector	(Electrical) household appliances (incl. kitchenware)	68	1%	9%	13%	47%	29%
	Air transport	21	5%	29%	19%	43%	5%
	Antiques and collectables	2	0%	50%	0%	0%	50%
	Baby and child articles	14	0%	7%	14%	43%	36%
	Beauty, health and wellness goods	132	2%	5%	13%	44%	37%
	Clothing, shoes and accessories	223	3%	11%	15%	42%	29%
	Computer games and software	49	4%	6%	10%	53%	27%
	Electronics and Computer Hardware	133	1%	8%	11%	44%	36%
	Entertainment (books, magazines, paperwares, music and movies)	66	2%	5%	11%	48%	35%
	FMCG	32	0%	13%	6%	59%	22%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	2%	6%	15%	47%	30%
	Insurances	11	0%	0%	45%	18%	36%
	Multi-sector	29	0%	10%	17%	38%	34%
	Online reservations of offline leisure	20	0%	0%	15%	40%	45%
	Payment services	16	0%	38%	6%	31%	25%
	Pet and animal products	14	0%	14%	14%	36%	36%
	Spares and accessories for vehicles	28	0%	4%	11%	46%	39%
	Sport & Leisure	12	0%	8%	17%	67%	8%
	Telecom services (e.g. internet, mobile telephone services)	29	3%	28%	24%	17%	28%
	Travel services	46	2%	4%	17%	30%	46%
Utilities (e.g. electricity, gas, water, petrol)	7	14%	43%	14%	0%	29%	

Base: 1,005 (all investigated websites)

Table 59. The perceived ease of finding the ODR link (by trader size)

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		1,005	2%	9%	14%	43%	32%
Size	Large traders	648	3%	12%	15%	44%	27%
	Medium-sized traders	257	0%	6%	10%	44%	40%
	Small traders	100	0%	4%	14%	34%	48%

Base: 1,005 (all investigated websites)

p) The amount of clicks needed to get to the webpage with the ODR link

Table 60. How many clicks did it take to get to the webpage with the ODR link (by country)

		Base	Average number of clicks	Maximum	Minimum	Range
Total		987	2	15	0	15
Countries (10 focus countries)	Poland	120	2	5	1	4
	Germany	95	1	5	1	4
	Denmark	94	1	4	1	3
	France	94	2	7	0	7
	Spain	92	1	6	0	6
	Netherlands	90	3	11	0	11
	Slovakia	89	2	15	1	14
	Sweden	89	2	4	1	3
	UK	88	2	10	0	10
	Italy	86	1	4	0	4
Countries (Top 3 websites)	Austria	3	3	6	2	4
	Belgium	3	3	4	1	3
	Bulgaria	3	1	2	0	2
	Croatia	3	1	3	0	3
	Czech Republic	3	2	3	2	1
	Denmark	3	2	2	1	1
	Estonia	3	3	5	1	4
	Finland	3	3	5	1	4
	France	3	3	5	1	4
	Germany	3	2	3	1	2
	Greece	3	2	3	1	2
	Hungary	3	4	5	3	2
	Ireland	3	5	7	4	3
	Italy	3	1	3	0	3
	Latvia	3	4	6	3	3
	Lithuania	3	3	4	3	1
	Luxembourg	3	3	3	3	0
	Netherlands	3	3	7	0	7
	Poland	3	3	4	3	1
	Portugal	3	3	4	1	3
	Romania	3	0	1	0	1
	Slovakia	3	7	15	1	14
	Slovenia	3	3	4	2	2
	Spain	3	1	1	1	0
	Sweden	3	2	2	1	1
	UK	2	4	5	2	3
	Cyprus	1	0	0	0	0
Malta	1	4	4	4	0	

Base: 987 (websites for which the section with the ODR-link could be found from

the homepage)

Table 61. How many clicks did it take to get to the webpage with the ODR link (by sector)

		Base	Average number of clicks	Maximum	Minimum	Range
Total		987	2	15	0	15
Sectors	(Electrical) household appliances (incl. kitchenware)	67	2	5	0	5
	Air transport	20	3	8	1	7
	Antiques and collectables	2	2	2	1	1
	Baby and child articles	14	2	7	1	6
	Beauty, health and wellness goods	131	2	11	0	11
	Clothing, shoes and accessories	216	2	7	0	7
	Computer games and software	48	2	5	1	4
	Electronics and Computer Hardware	133	2	10	1	9
	Entertainment (books, magazines, paperwares, music and movies)	66	2	9	0	9
	FMCG	31	1	4	1	3
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	52	2	6	1	5
	Insurances	10	3	5	1	4
	Multi-sector	29	2	6	0	6
	Online reservations of offline leisure	20	2	6	1	5
	Payment services	15	2	6	1	5
	Pet and animal products	14	2	8	1	7
	Spares and accessories for vehicles	28	2	5	1	4
	Sport & Leisure	12	3	6	1	5
	Telecom services (e.g. internet, mobile telephone services)	29	3	15	0	15
	Travel services	43	2	4	1	3
Utilities (e.g. electricity, gas, water, petrol)	7	4	8	1	7	

Base: 987 (websites for which the page with the ODR-link could be found from the homepage)

Table 62. How many clicks did it take to get to the webpage with the ODR link (by trader size)

		Base	Average number of clicks	Maximum	Minimum	Range
Total		987	2	15	0	15
Size	Large-sized traders	635	2	15	0	15
	Medium-sized traders	253	2	8	1	7
	Small traders	99	2	6	0	6

Base: 987 (websites for which the page with the ODR-link could be found from the homepage)

q) The need to use a website's search engine to find the ODR link

Table 63. The need to use a website's search engine to find the ODR link (by country)

		Base	Search engine used	Search engine not used
Total		1,005	2%	98%
Countries (10 focus countries)	Poland	120	0%	100%
	France	98	1%	99%
	Denmark	95	2%	98%
	Germany	95	0%	100%
	Spain	93	0%	100%
	UK	93	3%	97%
	Netherlands	91	4%	96%
	Slovakia	91	2%	98%
	Sweden	91	4%	96%
	Italy	88	3%	97%
Countries (Top 3 websites)	Austria	3	0%	100%
	Belgium	3	0%	100%
	Bulgaria	3	0%	100%
	Croatia	3	0%	100%
	Czech Republic	3	0%	100%
	Denmark	3	33%	67%
	Estonia	3	0%	100%
	Finland	3	0%	100%
	France	3	0%	100%
	Germany	3	0%	100%
	Greece	3	0%	100%
	Hungary	3	0%	100%
	Ireland	3	0%	100%
	Italy	3	0%	100%
	Latvia	3	0%	100%
	Lithuania	3	0%	100%
	Luxembourg	3	0%	100%
	Netherlands	3	0%	100%
	Poland	3	0%	100%
	Portugal	3	0%	100%
	Romania	3	0%	100%
	Slovakia	3	0%	100%
	Slovenia	3	0%	100%
	Spain	3	0%	100%
	Sweden	3	0%	100%
	UK	3	0%	100%
Cyprus	1	0%	100%	
Malta	1	0%	100%	

Base: 1,005 (all investigated websites)

Table 64. The need to use a website's search engine to find the ODR link (by sector)

		Base	Search engine used	Search engine not used
Total		1,005	2%	98%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	3%	97%
	Air transport	21	14%	86%
	Antiques and collectables	2	0%	100%
	Baby and child articles	14	0%	100%
	Beauty, health and wellness goods	132	1%	99%
	Clothing, shoes and accessories	223	2%	98%
	Computer games and software	49	2%	98%
	Electronics and Computer Hardware	133	0%	100%
	Entertainment (books, magazines, paperwares, music and movies)	66	0%	100%
	FMCG	32	0%	100%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	2%	98%
	Insurances	11	0%	100%
	Multi-sector	29	0%	100%
	Online reservations of offline leisure	20	0%	100%
	Payment services	16	6%	94%
	Pet and animal products	14	0%	100%
	Spares and accessories for vehicles	28	0%	100%
	Sport & Leisure	12	0%	100%
	Telecom services (e.g. internet, mobile telephone services)	29	3%	97%
	Travel services	46	7%	93%
Utilities (e.g. electricity, gas, water, petrol)	7	29%	71%	

Base: 1,005 (all investigated websites)

Table 65. The need to use a website's search engine to find the ODR link (by trader size)

		Base	Search engine used	Search engine not used
Total		1,005	2%	98%
Size	Large-sized traders	648	2%	98%
	Medium-sized traders	257	2%	98%
	Small traders	100	0%	100%

Base: 1,005 (all investigated websites)

r) The availability of the traders' e-mail addresses

Table 66. The availability of the traders' e-mail addresses (by country)

		Base	E-mail on ODR page	E-mail on other page	No E-mail available
Total		1,005	77%	12%	11%
Countries (10 focus countries)	Poland	120	88%	9%	3%
	France	98	62%	13%	24%
	Denmark	95	98%	2%	0%
	Germany	95	92%	6%	2%
	Spain	93	78%	8%	14%
	UK	93	60%	13%	27%
	Netherlands	91	63%	29%	9%
	Slovakia	91	90%	9%	1%
	Sweden	91	80%	8%	12%
	Italy	88	66%	23%	11%
Countries (Top 3 websites)	Austria	3	100%	0%	0%
	Belgium	3	100%	0%	0%
	Bulgaria	3	33%	67%	0%
	Croatia	3	33%	0%	67%
	Czech Republic	3	100%	0%	0%
	Denmark	3	100%	0%	0%
	Estonia	3	100%	0%	0%
	Finland	3	100%	0%	0%
	France	3	67%	0%	33%
	Germany	3	67%	33%	0%
	Greece	3	100%	0%	0%
	Hungary	3	100%	0%	0%
	Ireland	3	33%	0%	67%
	Italy	3	67%	33%	0%
	Latvia	3	67%	33%	0%
	Lithuania	3	33%	67%	0%
	Luxembourg	3	33%	0%	67%
	Netherlands	3	0%	67%	33%
	Poland	3	100%	0%	0%
	Portugal	3	33%	0%	67%
	Romania	3	33%	0%	67%
	Slovakia	3	100%	0%	0%
	Slovenia	3	67%	33%	0%
	Spain	3	0%	0%	100%
	Sweden	3	67%	0%	33%
	UK	3	67%	0%	33%
	Cyprus	1	100%	0%	0%
Malta	1	0%	100%	0%	

Base: 1,005 (all investigated websites)

Table 67. The availability of the traders' e-mail addresses (by sector)

		Base	E-mail on ODR page	E-mail on other page	No E-mail available
Total		1,005	77%	12%	11%
Sectors	(Electrical) household appliances (incl. kitchenware)	68	74%	22%	4%
	Air transport	21	62%	14%	24%
	Antiques and collectables	2	100%	0%	0%
	Baby and child articles	14	64%	14%	21%
	Beauty, health and wellness goods	132	83%	14%	3%
	Clothing, shoes and accessories	223	80%	10%	9%
	Computer games and software	49	78%	6%	16%
	Electronics and Computer Hardware	133	74%	10%	16%
	Entertainment (books, magazines, paperwares, music and movies)	66	70%	17%	14%
	FMCG	32	97%	0%	3%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	53	83%	11%	6%
	Insurances	11	82%	9%	9%
	Multi-sector	29	62%	10%	28%
	Online reservations of offline leisure	20	80%	10%	10%
	Payment services	16	63%	13%	25%
	Pet and animal products	14	86%	14%	0%
	Spares and accessories for vehicles	28	96%	0%	4%
	Sport & Leisure	12	100%	0%	0%
	Telecom services (e.g. internet, mobile telephone services)	29	59%	17%	24%
	Travel services	46	74%	17%	9%
Utilities (e.g. electricity, gas, water, petrol)	7	43%	14%	43%	

Base: 1,005 (all investigated websites)

Table 68. The availability of the traders' e-mail addresses (by trader size)

		Base	E-mail on ODR page	E-mail on other page	No E-mail available
Total		1,005	77%	12%	11%
Size	Large-sized traders	648	73%	13%	14%
	Medium-sized traders	257	84%	11%	5%
	Small traders	100	89%	8%	3%

Base: 1,005 (all investigated websites)

s) The ease of finding the trader's e-mail address

Table 69. How easy was it to find the e-mail address? (by country)

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		901	1%	1%	6%	46%	47%
Countries (10 focus countries)	Poland	116	0%	2%	10%	57%	31%
	Denmark	95	0%	1%	0%	81%	18%
	Germany	93	0%	0%	2%	8%	90%
	Slovakia	90	0%	0%	1%	16%	83%
	Netherlands	83	1%	0%	0%	46%	53%
	Sweden	80	1%	3%	0%	93%	4%
	Spain	80	0%	1%	16%	64%	19%
	Italy	78	1%	5%	12%	23%	59%
	France	74	1%	0%	12%	62%	24%
	UK	68	0%	0%	6%	13%	81%
Countries (Top 3 websites)	Austria	3	0%	0%	0%	0%	100%
	Belgium	3	0%	0%	0%	0%	100%
	Bulgaria	3	0%	0%	0%	67%	33%
	Czech Republic	3	0%	0%	0%	33%	67%
	Denmark	3	0%	33%	0%	33%	33%
	Estonia	3	0%	0%	0%	33%	67%
	Finland	3	0%	0%	0%	33%	67%
	Germany	3	0%	0%	0%	0%	100%
	Greece	3	0%	0%	0%	33%	67%
	Hungary	3	0%	0%	0%	67%	33%
	Italy	3	0%	0%	0%	33%	67%
	Latvia	3	0%	33%	33%	0%	33%
	Lithuania	3	0%	0%	0%	67%	33%
	Poland	3	0%	0%	100%	0%	0%
	Slovakia	3	0%	0%	0%	0%	100%
	Slovenia	3	0%	0%	0%	33%	67%
	France	2	0%	0%	0%	100%	0%
	Netherlands	2	0%	0%	0%	100%	0%
	Sweden	2	0%	0%	0%	100%	0%
	UK	2	0%	0%	0%	0%	100%
	Croatia	1	0%	0%	0%	0%	100%
	Cyprus	1	0%	0%	0%	0%	100%
	Ireland	1	0%	0%	0%	0%	100%
Luxembourg	1	0%	0%	0%	100%	0%	
Malta	1	0%	0%	0%	0%	100%	
Portugal	1	0%	0%	0%	0%	100%	
Romania	1	0%	0%	0%	0%	100%	
Spain	0	0%	0%	0%	0%	100%	

Base: 901 (websites for which an e-mail address was found)

Table 70. How easy was it to find the e-mail address? (by sector)

		Base	ODR-specific e-mail	Other e-mail
Total		778	9%	91%
Sectors	(Electrical) household appliances (incl. kitchenware)	50	8%	92%
	Air transport	13	38%	62%
	Antiques and collectables	2	0%	100%
	Baby and child articles	9	11%	89%
	Beauty, health and wellness goods	109	5%	95%
	Clothing, shoes and accessories	179	13%	87%
	Computer games and software	38	8%	92%
	Electronics and Computer Hardware	99	4%	96%
	Entertainment (books, magazines, paperwares, music and movies)	46	4%	96%
	FMCG	31	6%	94%
	Furniture, furnishings and decoration (including do-it-yourself goods, maintenance and gardening products)	44	5%	95%
	Insurances	9	11%	89%
	Multi-sector	18	17%	83%
	Online reservations of offline leisure	16	13%	88%
	Payment services	10	30%	70%
	Pet and animal products	12	8%	92%
	Spares and accessories for vehicles	27	11%	89%
	Sport & Leisure	12	0%	100%
	Telecom services (e.g. internet, mobile telephone services)	17	6%	94%
	Travel services	34	15%	85%
Utilities (e.g. electricity, gas, water, petrol)	3	0%	100%	

Base: 778 (websites where an e-mail address was found on the same page as the ODR link)

Table 71. How easy was it to find the e-mail address? (by trader size)

		Base	Very difficult	Difficult	Neutral	Easy	Very easy
Total		901	1%	1%	6%	46%	47%
Size	Large traders	559	1%	2%	7%	48%	42%
	Medium-sized traders	245	0%	0%	2%	45%	52%
	Small traders	97	0%	0%	5%	36%	59%

Base: 901 (websites for which an e-mail address was found)

