



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

JUST/2016/CONS/FW/CO03/0104

Final Report

Written by GfK
28 March 2018



*Justice
and
Consumers*

EUROPEAN COMMISSION

Produced by Consumers, Health, Agriculture and Food Executive Agency (Chafea) on behalf of

Directorate-General for Justice and Consumers
Directorate E – Consumers
Unit Consumer enforcement and redress

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Luxembourg: Publications Office of the European Union, 2018

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|--------|-------------------------------------|-------------------------|---------------------|
| EN PDF | Catalogue number: DS-04-18-276-EN-N | ISBN: 978-92-79-81215-6 | doi: 10.2838/128916 |
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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 purchases within the EU. Most complaints were related to purchases of clothing and footwear, airline tickets and information and communication technology goods.⁴

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

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

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)
- 6) *Engagement (web traffic)* (the average monthly website visits over the last 6 months⁶)
- 7) *% EU Traffic* (percentage of traffic originating from EU countries)

⁵ See Annex 1 for a sector overview

⁶ 6 months between October 2016 and April 2017

- 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)

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 and

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

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 country classification by TLD has also been crosschecked with the proportion of traffic coming

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.

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. Evotech.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 Evotech.com) was multiplied with the total average traffic of a website (Engagement; i.e. 8,988 visits in the case of *Evotech.com*) to arrive at average EU traffic (EU Traffic; 8853 visits in the case of *Evotech.com*).

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

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-scraping script, on which a delay of 1 second was set between requests in order to minimise the load on the website.

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

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>

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 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.

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.

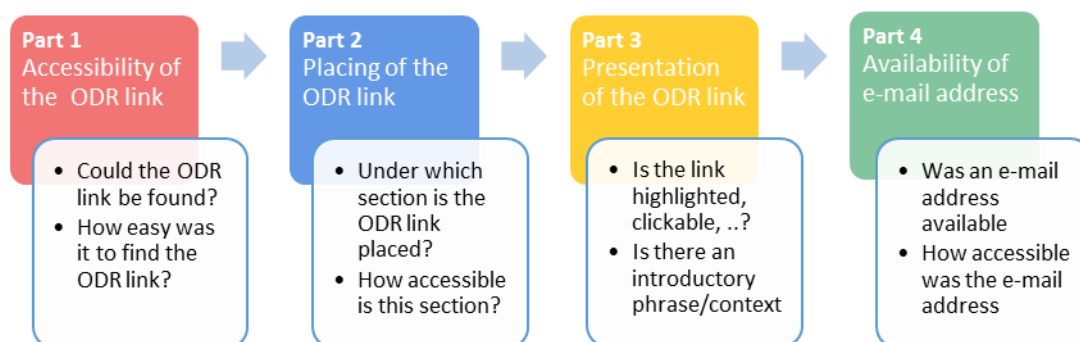
²² <https://www.gnu.org/software/wget/>

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 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

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/>

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.

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% |
| 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% |

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>

| | | | | | |
|-----------|-------|----|---------|-----|-----|
| 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

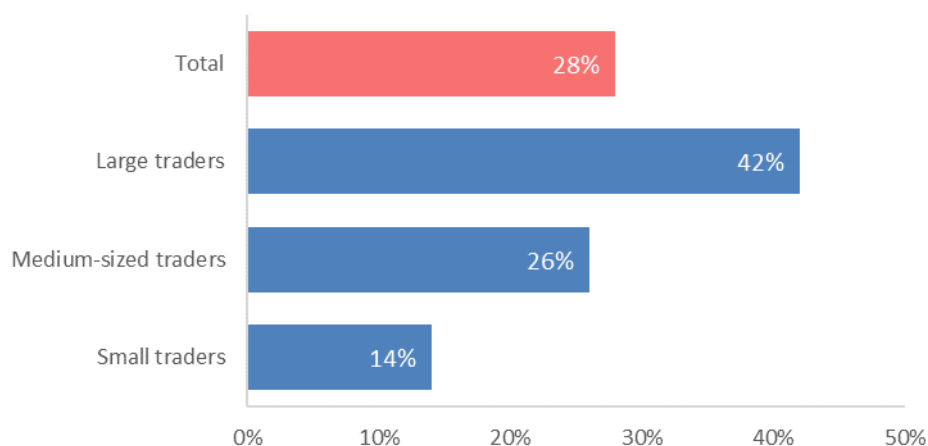
The ODR Regulation requires traders to place a link to the ODR platform and their e-mail address on their website and make it easily accessible for consumers. The results of a web-scraping exercise and a mystery shopping audit provide insights into EU online traders' compliance with these requirements. 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.**

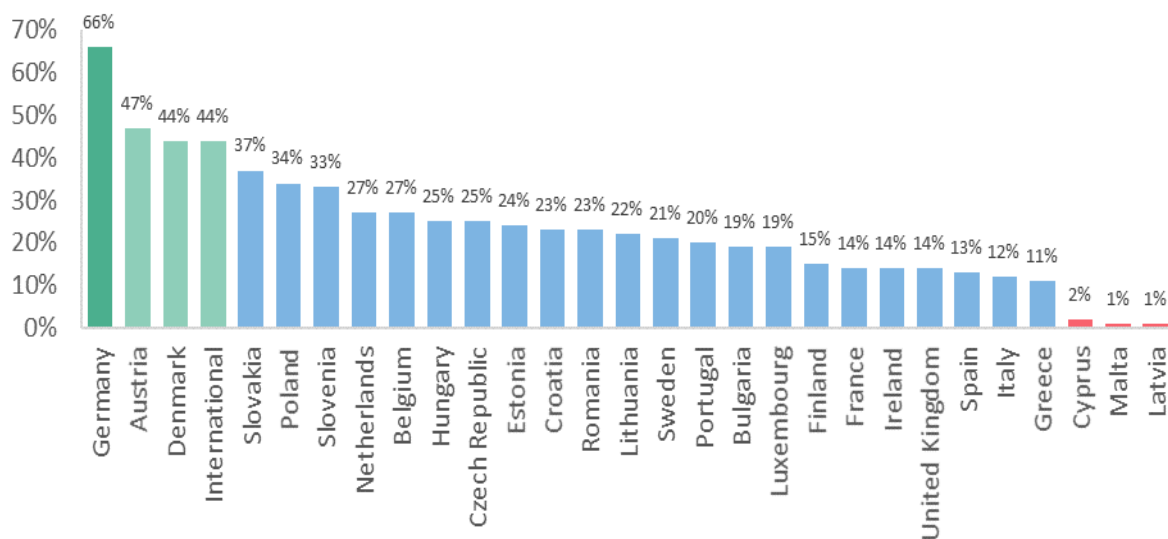
The compliance of online traders with the ODR Regulation depends on the **size of the trader**. As illustrated in Figure 2, almost half of the large traders (42%) included the ODR link on their website. In contrast, medium-sized traders (26%) and small traders (14%) were noticeably less likely to include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

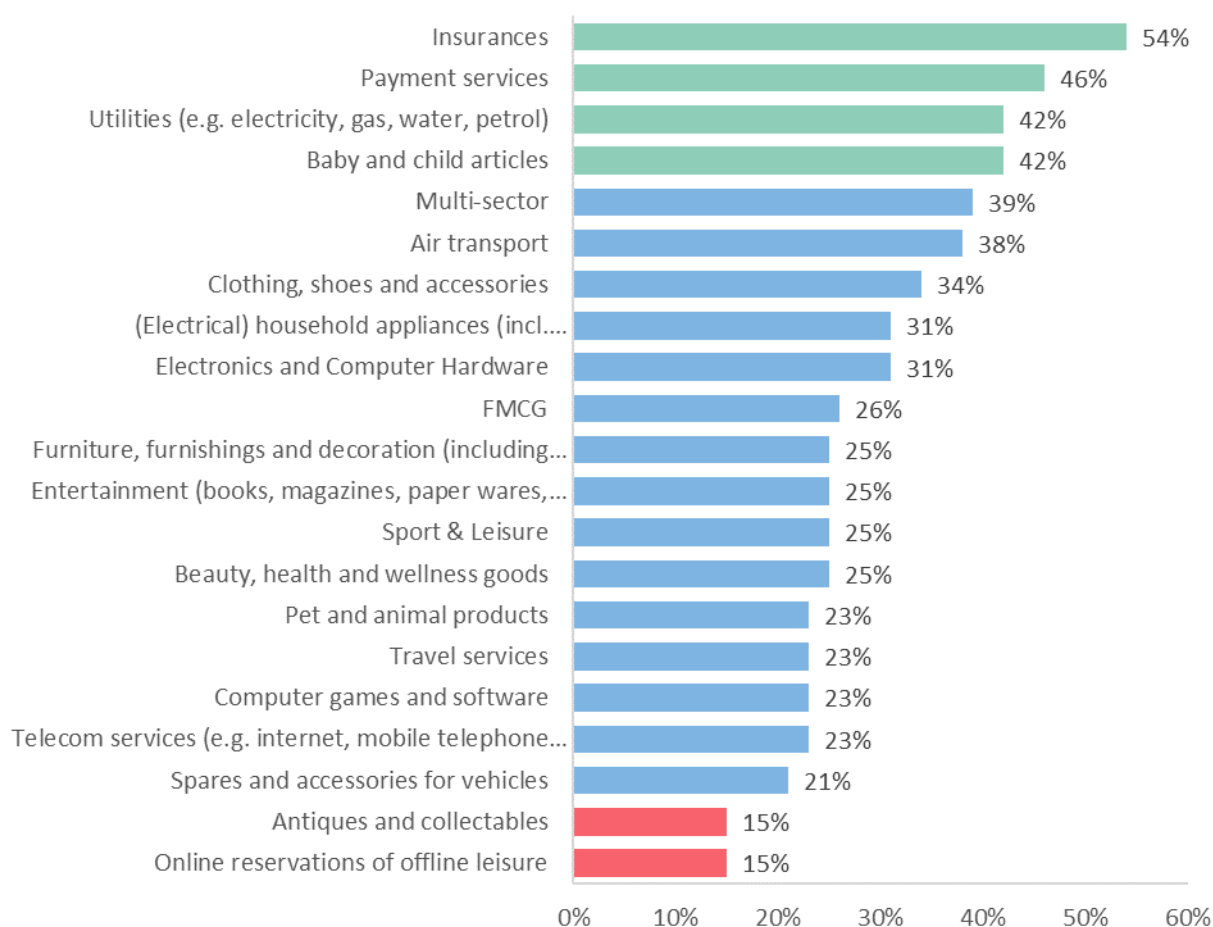


Table 7. Availability of the ODR link per sector

| 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

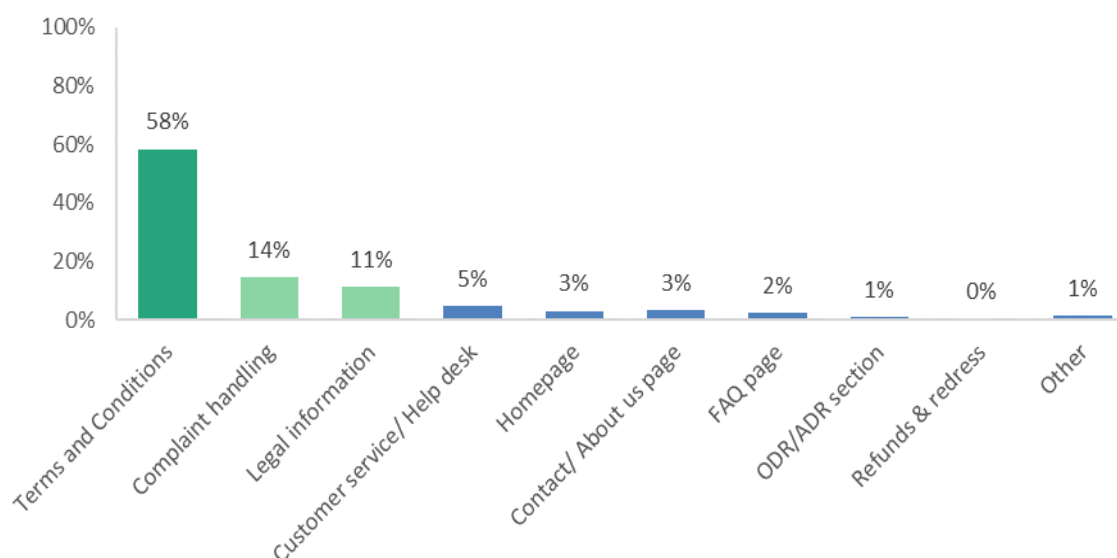
According to Article 14 of the ODR Regulation, EU online traders are not only obliged to post the ODR link on their websites, but also to make this link easily accessible. The goal of the mystery shopping, which was conducted between August 7th and September 15th, was to investigate online traders' compliance 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%).

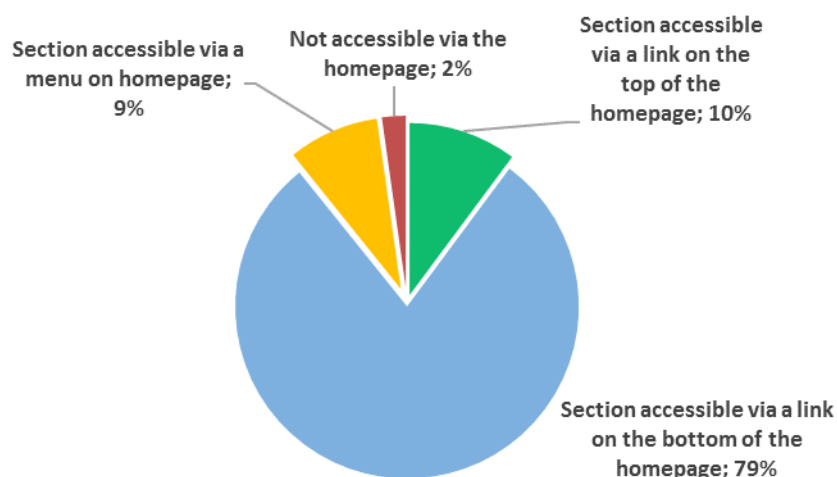
Table 10. Perceived ease of finding the ODR-link conditional on where the ODR link was placed

| 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?



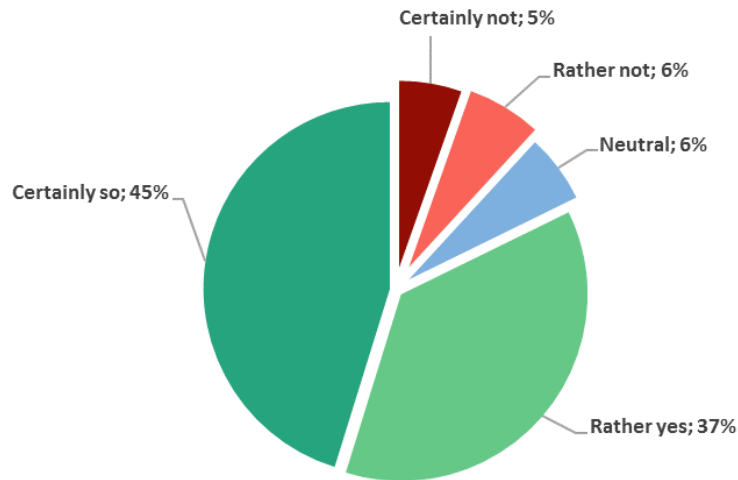
Base: 974 (excluding websites with the ODR link on the homepage)

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?



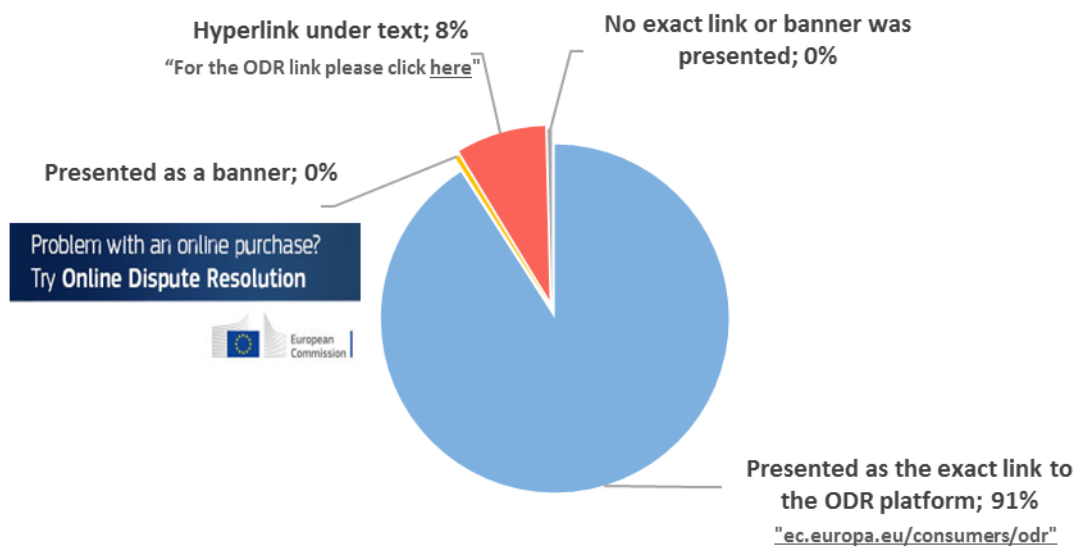
Base: 974 (excluding websites with the ODR link on the homepage)

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%).

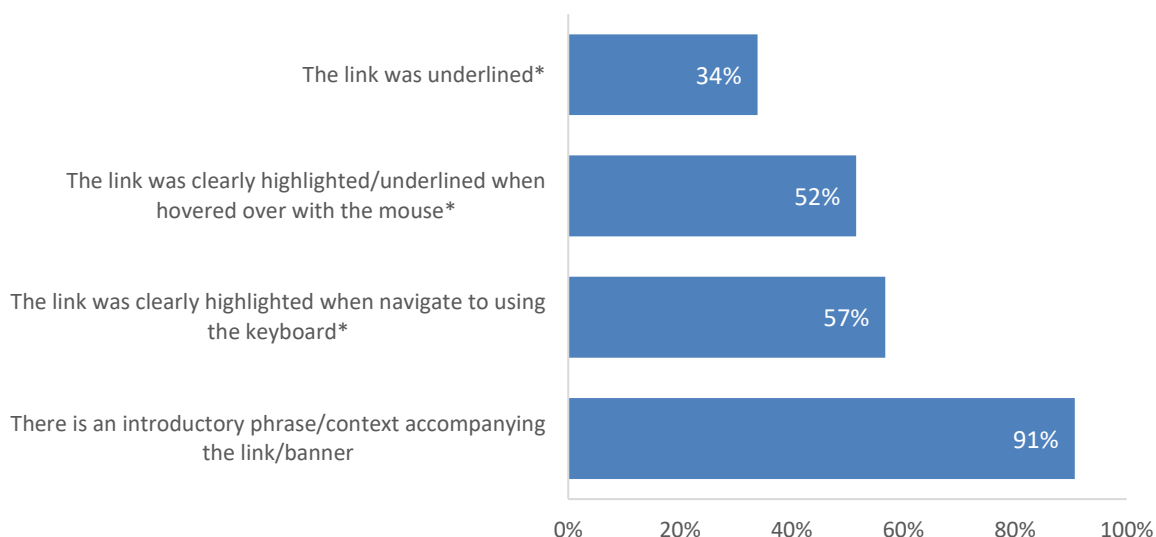
Figure 8. How was the link to the ODR platform presented?



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



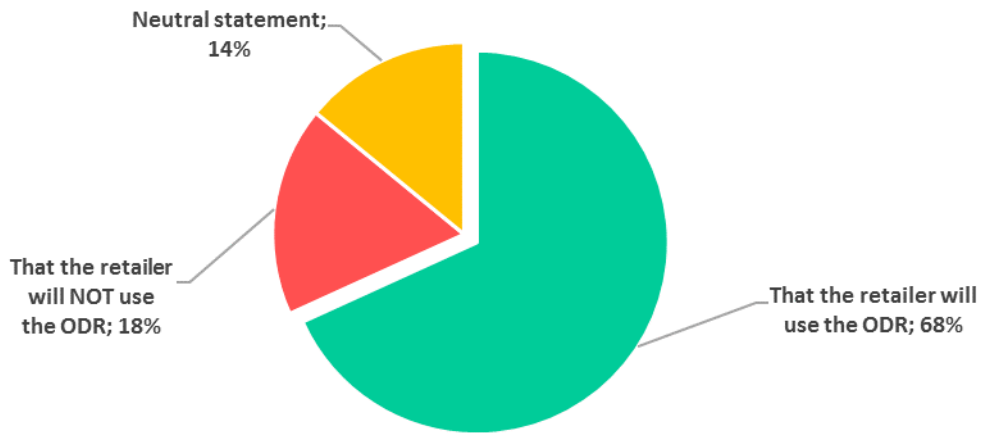
*Base: 1,005 (all investigated websites); * not applicable when the link was presented as a banner (Base: 995)*

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.

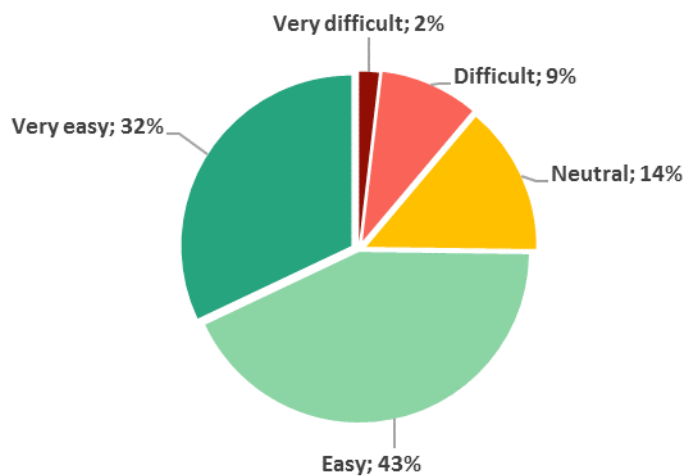
4.2.3 Accessibility of the ODR link

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.

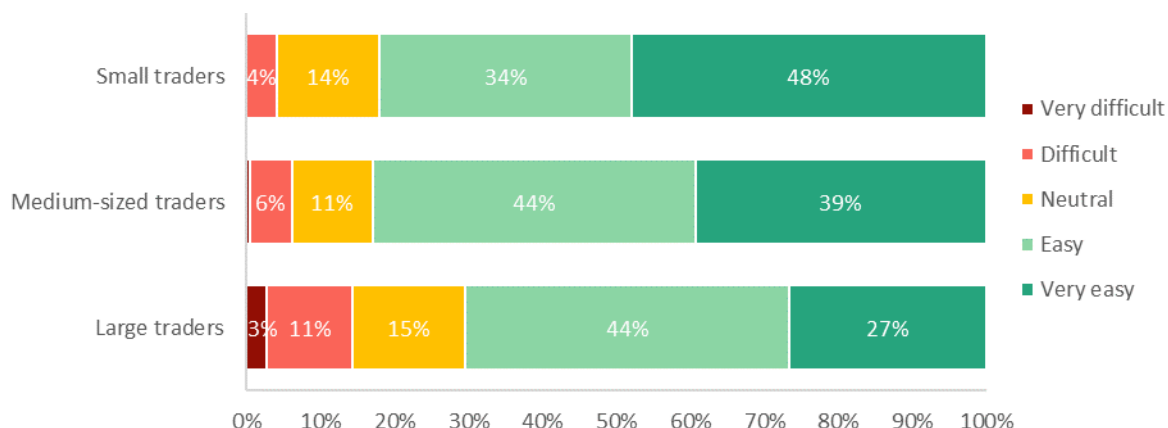
Figure 11. How easy was the ODR link found?



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 pages of the website | <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

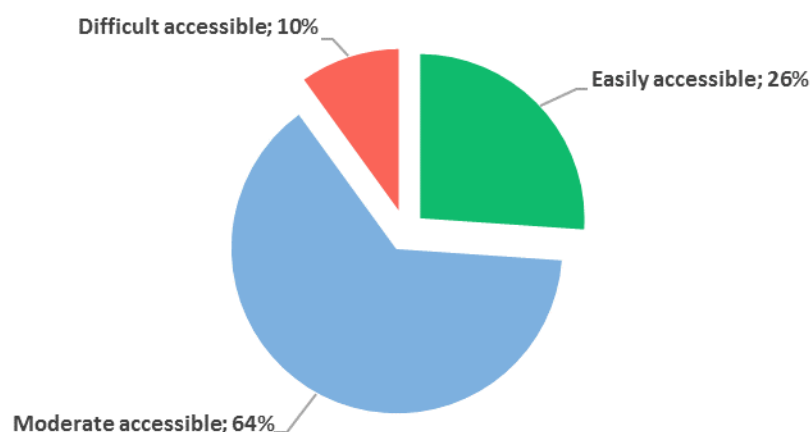
⁴² To calculate the number of clicks that correspond with the ease of access of the ODR link, the mean (M=1.748) and standard deviation (SD=1.127) were calculated for all clicks (without outliers; values +/- 3 SD from the mean).

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.

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

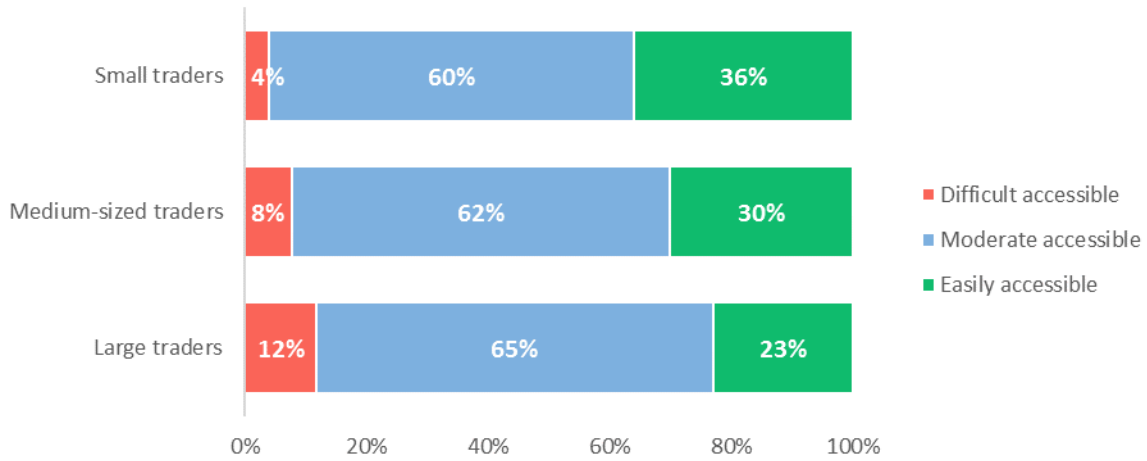
Figure 13. How was accessibility of the ODR link graded?



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%).

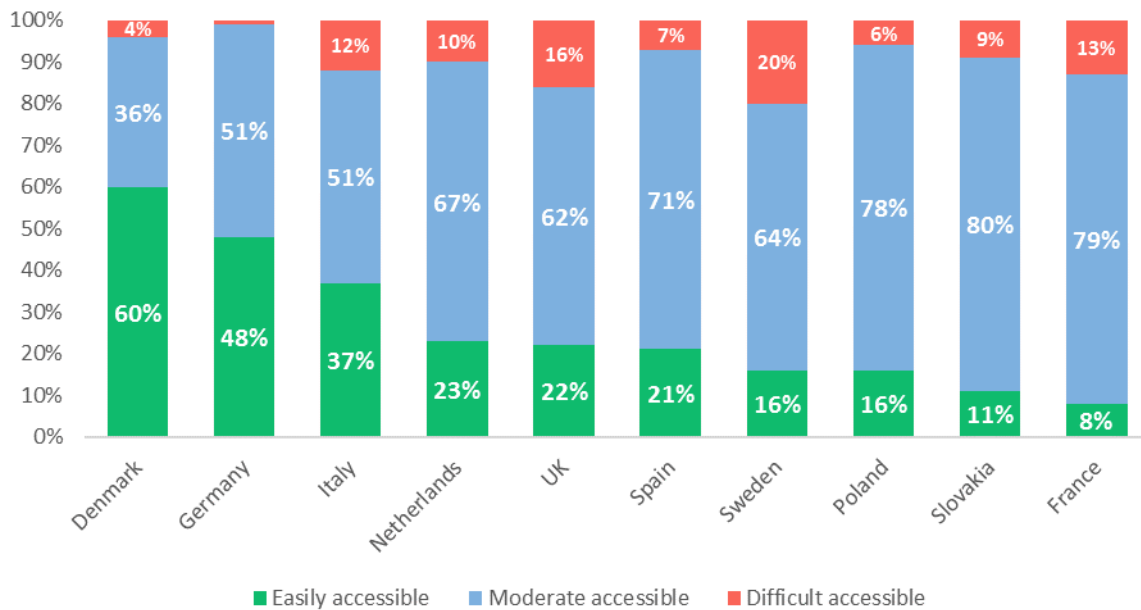
Figure 14. Accessibility of the ODR link by trader size



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

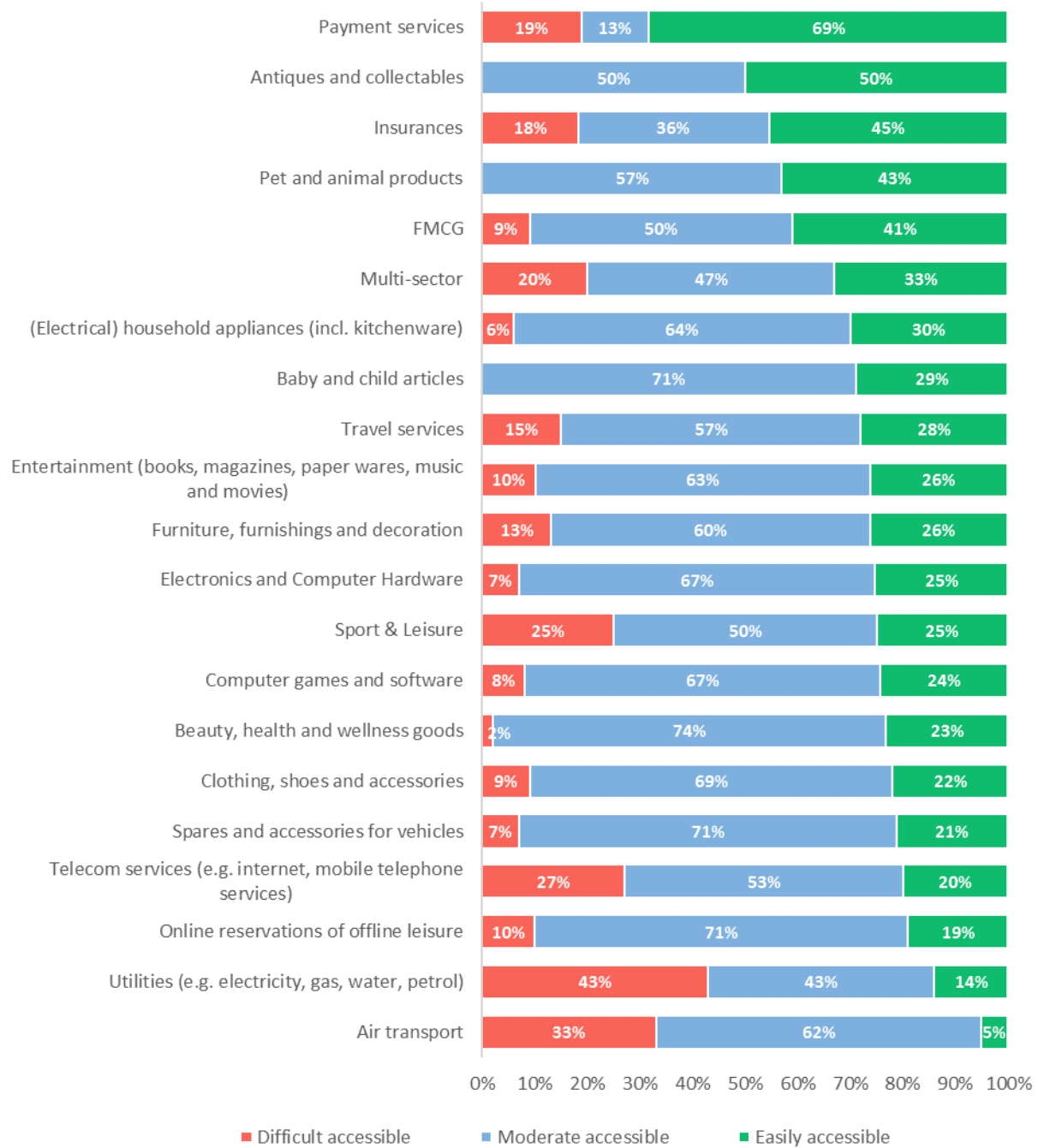
| | | Base | Easily accessible | Moderate accessible | Difficult accessible |
|---|----------------|--------------|-------------------|---------------------|----------------------|
| Total | | 1,005 | 26% | 64% | 10% |
| Countries (10 focus countries) | Denmark | 95 | 60% | 36% | 4% |
| | Germany | 95 | 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

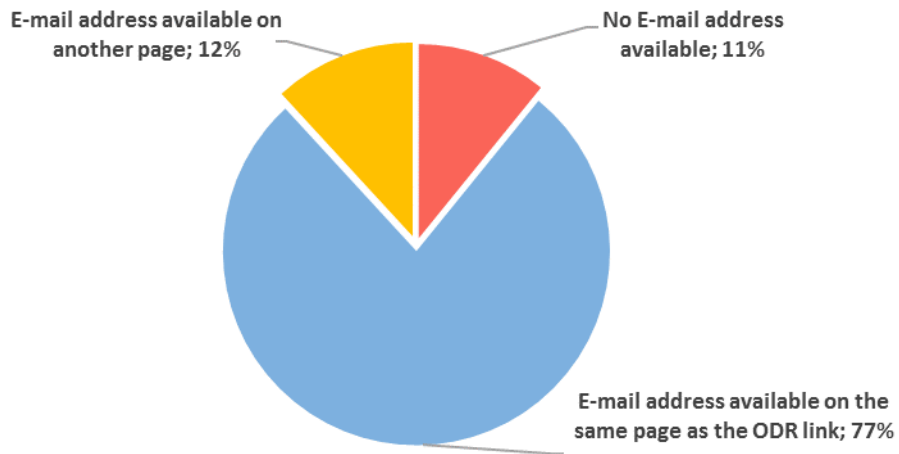
| | | Base | Easily accessible | Moderate accessible | Difficult accessible |
|---------------|--|--------------|-------------------|---------------------|----------------------|
| Total | | 1,005 | 26% | 64% | 10% |
| Sectors | Payment services | 16 | 69% | 13% | 19% |
| | Antiques and collectables | 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.

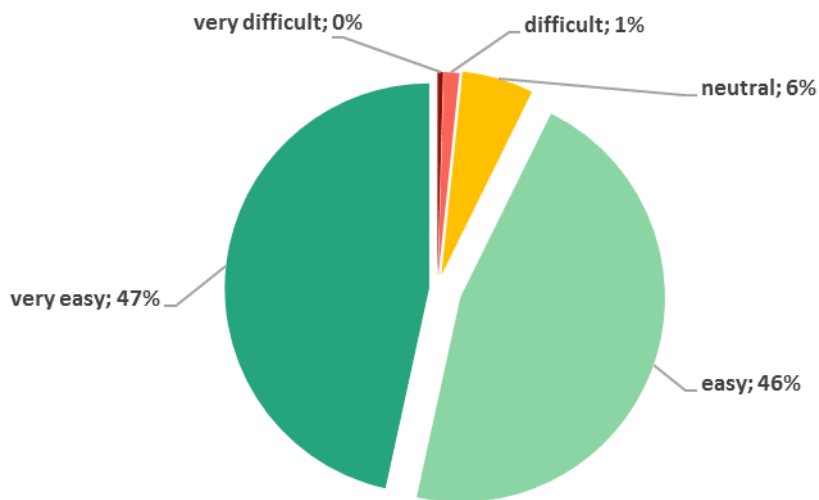
Figure 17. Was the trader's e-mail address available?



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.

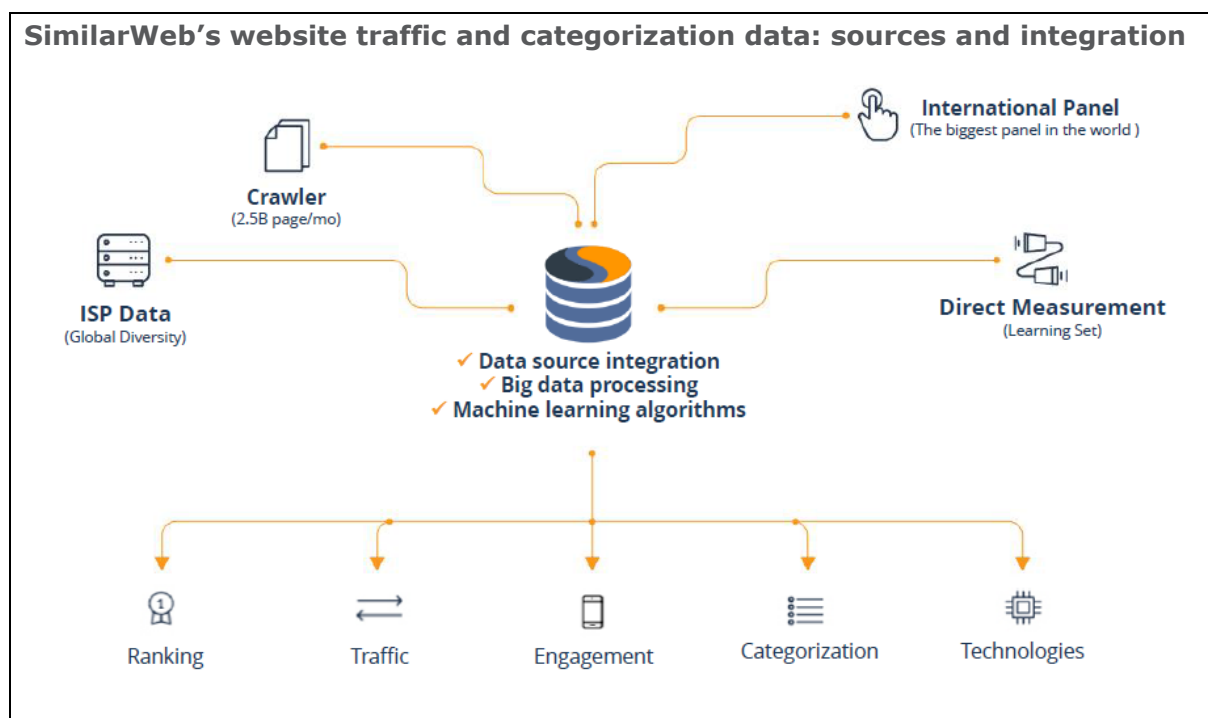
| | |
|--|---|
| | Car rentals |
| | Various tourism services |
| Utilities (e.g., electricity, gas, water and petrol) ⁴⁹ | Electricity |
| | Heating |
| | Gas, oil, petrol and diesel |
| Antiques and collectibles* | Antique and vintage goods |
| | Coins, bills, medals, stamps and metals |
| | Collectibles (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 ranked per country in a given sector and is able to offer detailed cross-border traffic data per country.

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

This cross-border data in itself can also be used to calculate an estimated EU traffic percentage.

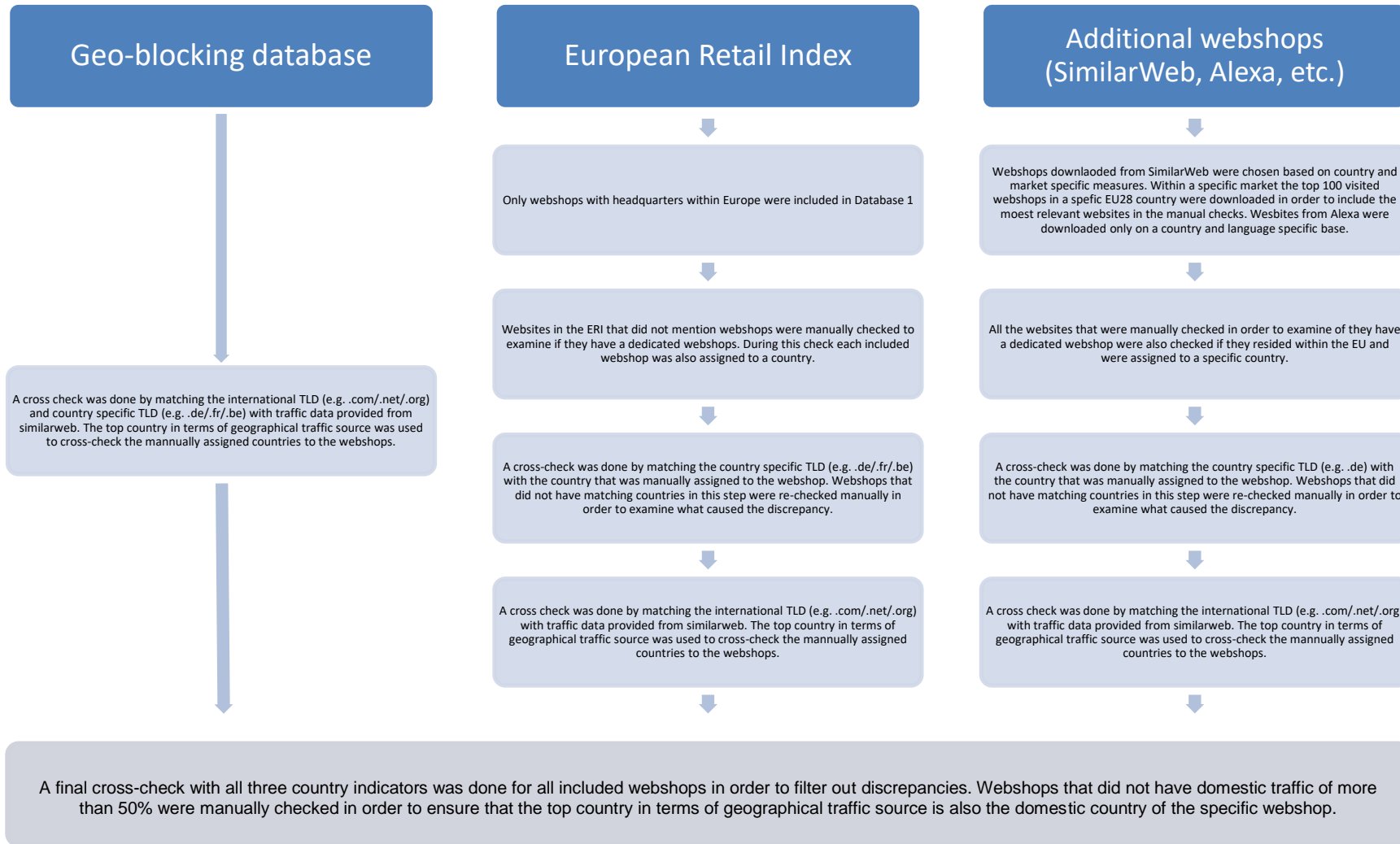
The clear advantage of using SimilarWeb is that their traffic data estimations are likely to be the most accurate on the market because they have the largest panels to collect clickstream data from and use multiple data collection sources. In addition, they have dedicated "shopping" categories. The downside 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

51



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

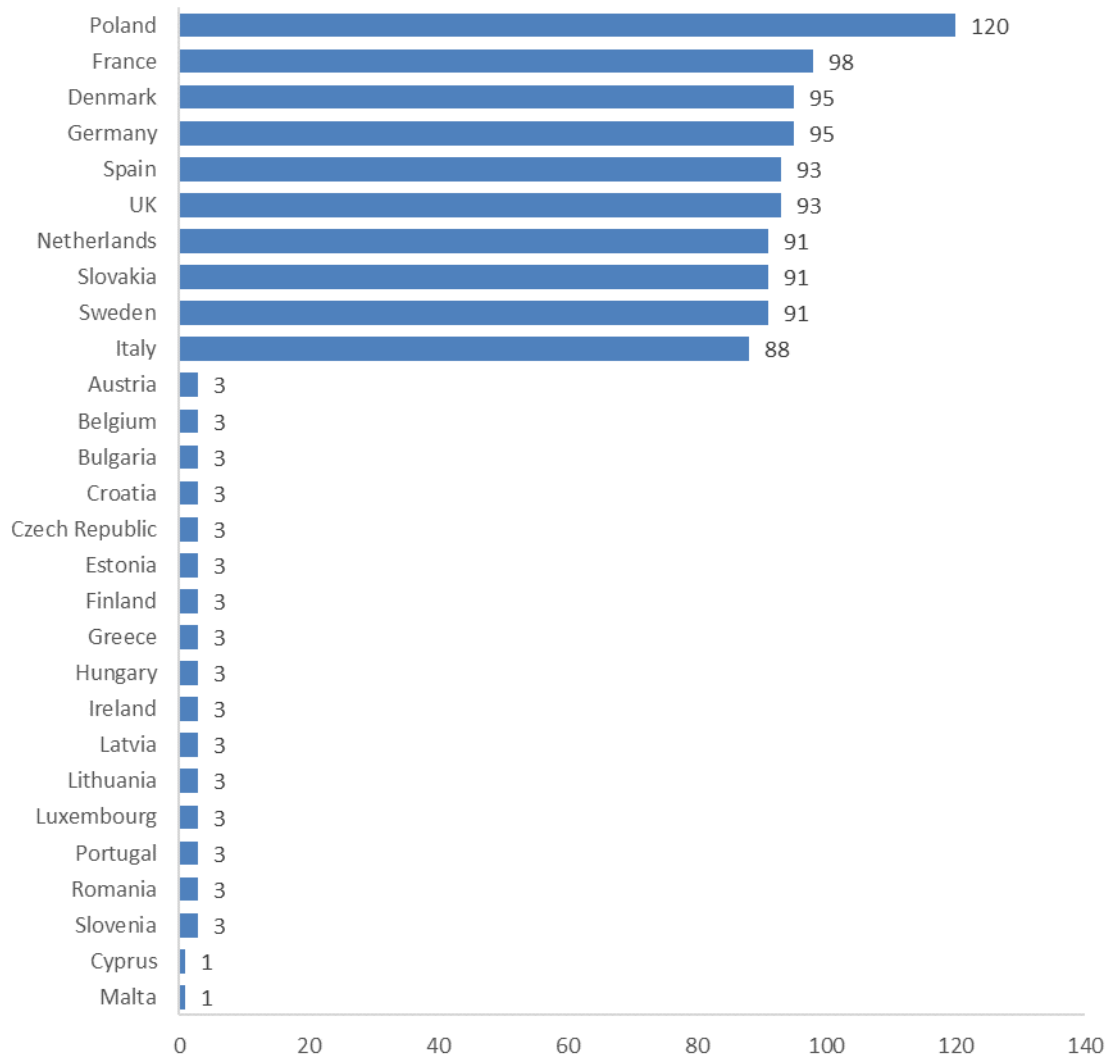


Figure 20. Distribution of mystery shopping cases across trader size

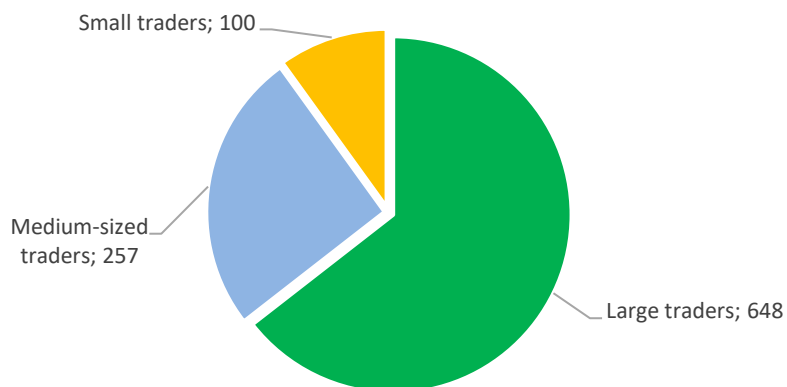
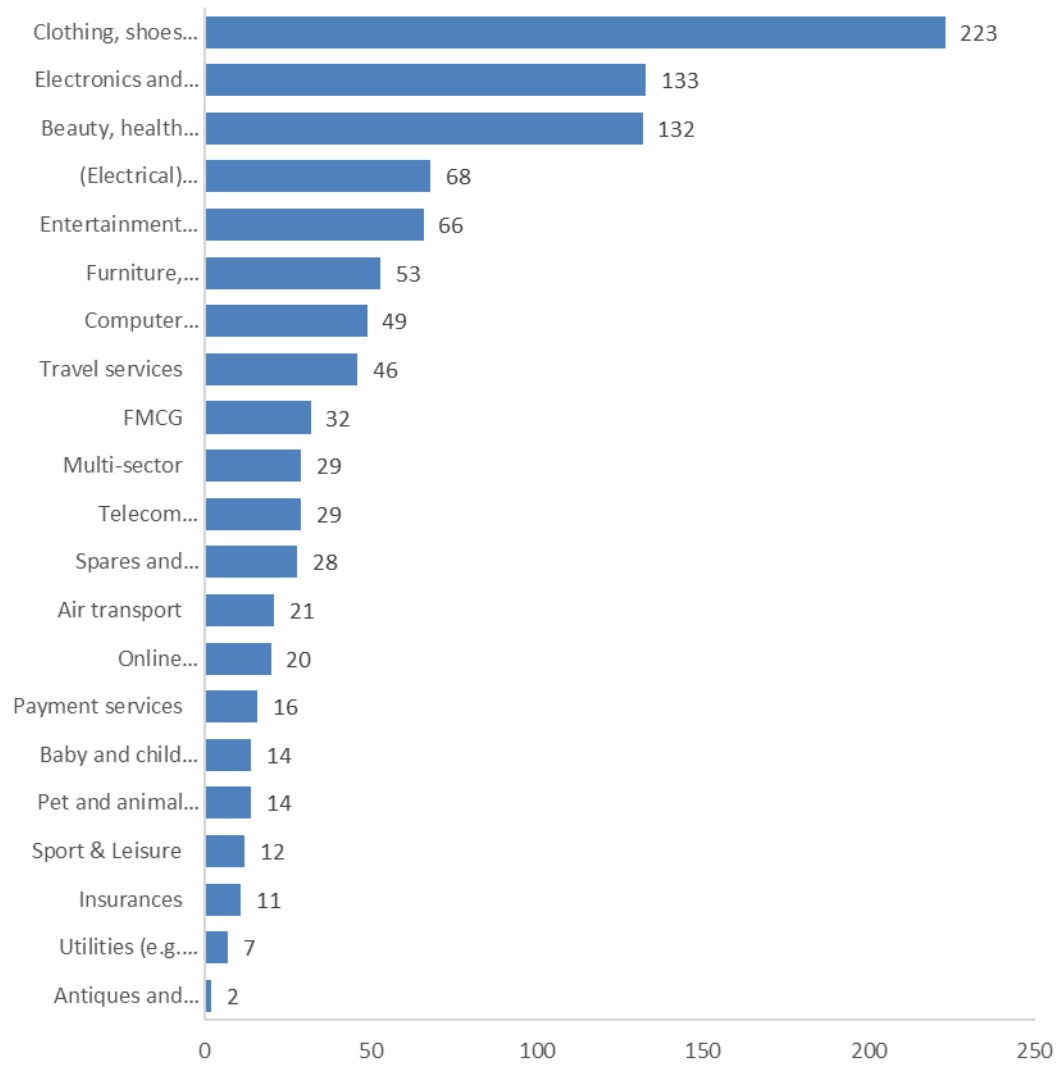


Figure 21. Distribution of mystery shopping cases across sectors



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

| | Small traders | Medium-sized traders | | Large |
|----------------|------------------------|------------------------|------------------------|--------------------------------------|
| Country | 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 Kingdom | 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.

Online Dispute Resolution web-scraping

| | | | | |
|----------------|--------------|--------------|---------------|---------------|
| 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% |
|--|-------|---|------|----|----|----|

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% |
| Sector s | (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)

