

Entering the European market for adaptive apparel

Some of the world's most interesting apparel markets are in Europe. However, establishing a business relationship with European buyers can be challenging. This report will help you understand what the most important requirements and opportunities are in the European market. You will learn about the legal requirements for exporting adaptive apparel to Europe, about the best channels to get your product to market, about the countries where your competitors are and the best way to quote prices for potential buyers.

Contents of this page

1. [What requirements must adaptive apparel comply with to be allowed on the European market?](#)
2. [Through what channels can you get adaptive apparel on the European market?](#)
3. [What competition do you face on the European adaptive apparel market?](#)
4. [What are the prices for adaptive apparel on the European market?](#)

1. What requirements must adaptive apparel comply with to be allowed on the European market?

If you want to sell adaptive apparel in the European market, you need to comply with several requirements, some of which are mandatory, whether they are legal requirements or not. Others are voluntary, but meeting them can give you a competitive advantage. Some requirements only apply to certain niches in this market.

Mandatory requirements

There are several legal requirements you need to comply with if you want to export adaptive apparel to the European market, including requirements concerning product safety, the use of chemicals (REACH), quality and labelling. Additionally, many buyers have created non-negotiable terms and conditions for all their suppliers to comply with. These requirements are not required by law, but are still mandatory.

Product safety

Any item of adaptive apparel for sale in the EU must comply with the EU's General Product Safety Directive ([GPSD: 2001/95/EC](#)). European Union Member Countries will check if your product meets the applicable safety requirements.

If your buyer has supplied the product design, it is their responsibility to make sure it is legally safe for consumers to use. However, if you have any doubts about whether a design is not compliant with the EU's General Product Safety Directive, discuss it with your buyer before you start the production process.

In the adaptive apparel market, where end consumers may be vulnerable or sensitive, any claims of safety or comfort must be backed by as much as possible:

- technical product information;
- independent test reports;
- wash and wearer trials in a domestic setting.

Special requirements for children's wear

The EU has a [specific standard for the safety of children's wear](#), including adaptive apparel. This standard contains requirements to ensure that cords and drawstrings are placed safely on apparel for children up to 14 years. This is to avoid strangulation and choking hazards. Check the EU's [2019 Guidance Document](#) for extra information on safety requirements for children's wear.

REACH

Any item of adaptive apparel exported to the EU must comply with [the REACH Regulation](#), which stands for registration, evaluation, authorisation and restriction of chemicals. This regulation restricts or prohibits altogether the use of many chemicals in apparel and specific materials used for trims.

Chemicals commonly used in apparel production, which are restricted under REACH include:

- azo dyes that may release one or more of the 22 aromatic amines listed in [Appendix 8 to the REACH Regulation](#), nonylphenol and nonylphenol ethoxylates, and heavy metals, such as mercury, cadmium and lead;
- flame retardants, such as tris (2,3-dibromopropyl) phosphate, tris (aziridiny) phosphin oxide and polybrominated biphenyls (PBB);
- waterproofing and stain-repelling chemicals, such as perfluorooctane sulfonic acid and its derivatives (PFOS), which were originally restricted under REACH, but are now restricted under the Stockholm Convention ([EU Regulation 2019/1021](#)), as well as other persistent organic pollutants (POPs);
- nickel, a restricted compound in metal trims and accessories, such as zippers, buttons and jewellery;
- polycyclic-aromatic hydrocarbons (PAHs) and phthalates used in plastic and PVC parts.
- certain nanomaterials used to make fabrics antibacterial.

Restricted substances lists (RSLs)

In addition to REACH, many brands and retailers have formulated their own restricted substances lists (RSLs), which are stricter than REACH. They are often inspired by the guideline on the use of safe chemicals from the Zero Discharge of Hazardous Chemicals (ZDHC) foundation. Download the ZDHC [Conformance Guidance](#) to learn how to comply with the ZDHC guideline.

Labelling your product

You must specify the material content of every item of adaptive apparel that you export to the EU, in accordance with EU [Regulation 1007/2001](#). The purpose of this regulation is to let consumers know what type of apparel they are buying.

Labelling the country of origin ('Made in') or labelling care instructions is not yet legally required in the EU. Including care labels is highly recommended though. [ISO 3758: 2012](#) is the preferred standard for care labelling. The care label symbols are property of the company [GINETEX](#). You need to pay a fixed compensation to GINETEX for the use of these symbols.

Intellectual property rights

If you are selling your own designs in the European market, you must make sure you are not violating any intellectual property (IP) rights. If your buyer provides the design, they will also be liable in case the item is found to violate a property right.

Complying with intellectual property rights also means you cannot copy nor share designs from one buyer with another. European buyers expect you to handle their designs prudently.

Non-legal mandatory requirements

In addition to the legal requirements mentioned above, you may be required to comply with non-negotiable terms and conditions that buyers have created for their suppliers. Such requirements are not required by law, but they are still mandatory.

Sustainable production and social responsibility

Many buyers in Europe are increasing their demands in relation to sustainable production and social

responsibility. At the very least, buyers will ask you to open your factory doors for them, so they can conduct personal inspections of your factory. Additionally, you may be requested to comply with the following independent standards:

- Standard 100 by [Oeko-Tex](#) is the most widely required standard regarding harmful substances and sustainable production. European buyers may also require standards such as the [EU Ecolabel](#), [BCI](#) (Better Cotton Initiative), [GOTS](#) (Global Organic Textile Standard) and [Bluesign](#).
- Regarding social responsibility, [BSCI](#) (Business Social Compliance Initiative) is the most popular certification that European buyers require. Other popular CSR standards include [FWF](#), [WRAP](#), [SEDEX](#), [ETI](#), [SA8000](#), [ISO 26000](#), and [Fair Trade](#).

Packaging requirements

Your buyer will give you instructions on how to package the order in most cases. If you agree with your buyer that they will clear customs in the country of import, which is the norm in the apparel industry, it is their responsibility to make sure the instructions comply with EU import procedures.

The packaging instructions will be written down in a packing manual, where you will find all relevant packing instructions concerning:

- type and quality of the packing material you need to use;
- size of the packing material;
- information that should be mentioned on the packing material, including style references and numbers, size breakdown, number of pieces and colourways;
- placement and position of barcodes;
- way of stacking;
- maximum quantity in a box or polybag;
- maximum weight of an export carton;
- named suppliers for the packing material.

If you can provide frustration-free packaging, that will be an additional competitive advantage. This means boxes that are easy to open for end consumers and convenient to reseal in case of returns.

Your buyer will also appreciate any efforts you make to reduce the environmental impact and the financial cost of using packaging materials. First, you can make suggestions on how to use less packaging materials. Another option is to use environmentally friendly alternatives, such as recycled and biodegradable materials.

Payment terms

Normally, European buyers will pay you a percentage of the total sum of the order, for example, 30% of it when they place the order, and the rest (70% in the example) after the order is completed. The most used payment method in the apparel industry for such a transaction is the letter of credit (LC). An LC obligates a buyer's bank to pay the supplier when both parties meet the conditions they have agreed upon.

In other cases, a buyer might ask for a telegraphic transfer (TT) after 30, 60, 90 or sometimes even 120 days. This means you, as a manufacturer, finish the production and hand over the shipment to the buyer, including the original documents before payment is due. The payment will be made after the number of days that you have agreed on with the buyer. This is a risky payment agreement because you take full financial risk.

Additional requirements

In addition to non-legal, but mandatory requirements like standards and certifications, there are many services that buyers implicitly expect or at least highly appreciate if you want to do business with them. These requirements can differ from buyer to buyer.

Product design and development

European buyers of adaptive apparel appreciate manufacturers that have their own ideas on product design and development, such as innovations that help consumers put garments on and off more easily. These features enable people with limited dexterity to stay independent, which is a big selling point. Innovation in garment fitting and garment fastenings are also valuable, such as replacing buttons with magnetic closures and zippers with Velcro.

Ease of washing and resistance to staining from wear are also highly appreciated product features. These features were traditionally achieved by using synthetic fibres, but new technology combines natural fibres with high-performance fabric finishes to reach the same results, including the following.

- soil resistance
- odour repellence
- crease resistance
- breathability
- sweat wicking
- thermal properties
- stain release
- easy iron
- quick drying
- colour fastness
- anti-yellowing for white apparel and underwear

Communication

Smooth communication is an implicit requirement of all buyers. Always reply to every email within 24 hours. Even if it is just to confirm that you have received the email and will send a more complete reply later. If you have a problem with a production order, immediately notify the customer and try to offer a solution. Another good tip is to create a T&A (time and arrival) of every order and share it with your buyer. This file will help you to manage expectations, monitor progress and is the best guarantee of on-time delivery.

Flexibility

Many factories focus only on getting convenient orders: simple designs, large quantities and long delivery times. However, if you want to start a business relationship with a European buyer, be prepared to accept complicated orders first. Buyers will want to test your factory before giving you large, easy orders. Make sure at the start that a buyer will not continue to place only difficult orders with you and convenient orders elsewhere.

Expect a European buyer to require in their first order:

- high material quality and impeccable workmanship;
- order quantities below your normal minimum order quantity (MOQ);
- a price level that is lower than you normally would accept for small quantity orders.

Tips:

Read the CBI study [on buyer requirements](#) for an extensive overview of the legal, non-legal and niche requirements you will need to comply with as an exporter of adaptive apparel to Europe.

Try to get feedback from end consumers on how to improve your adaptive garments. You can then agree with your buyer on a plan to work with the trim supplier or the pattern cutter to develop garments that best suit the needs of end consumers.

Familiarise yourself with the [complete list of chemicals restricted under REACH](#). Make sure you only work with suppliers of leather and trims that are REACH compliant. Ask for proof that they are.

Niche requirements

The adaptive apparel market is itself a niche that caters to the individual requirements of consumer groups with very diverse needs. It is important to work with buyers and advocacy groups to develop a sensitive and meaningful way to subsegment this market and address each niche in a relevant manner.

Children's wear is the fastest growing niche within the adaptive apparel market. However, children's wear has more stringent safety requirements, so the barriers to entry are higher while prices are slightly lower.

Another growing niche is oversized apparel, for which the demand is expected to grow. For many years now, the average body measurements of the general European population have been showing a tendency towards larger sizes. This development is also relevant for the elderly segment.

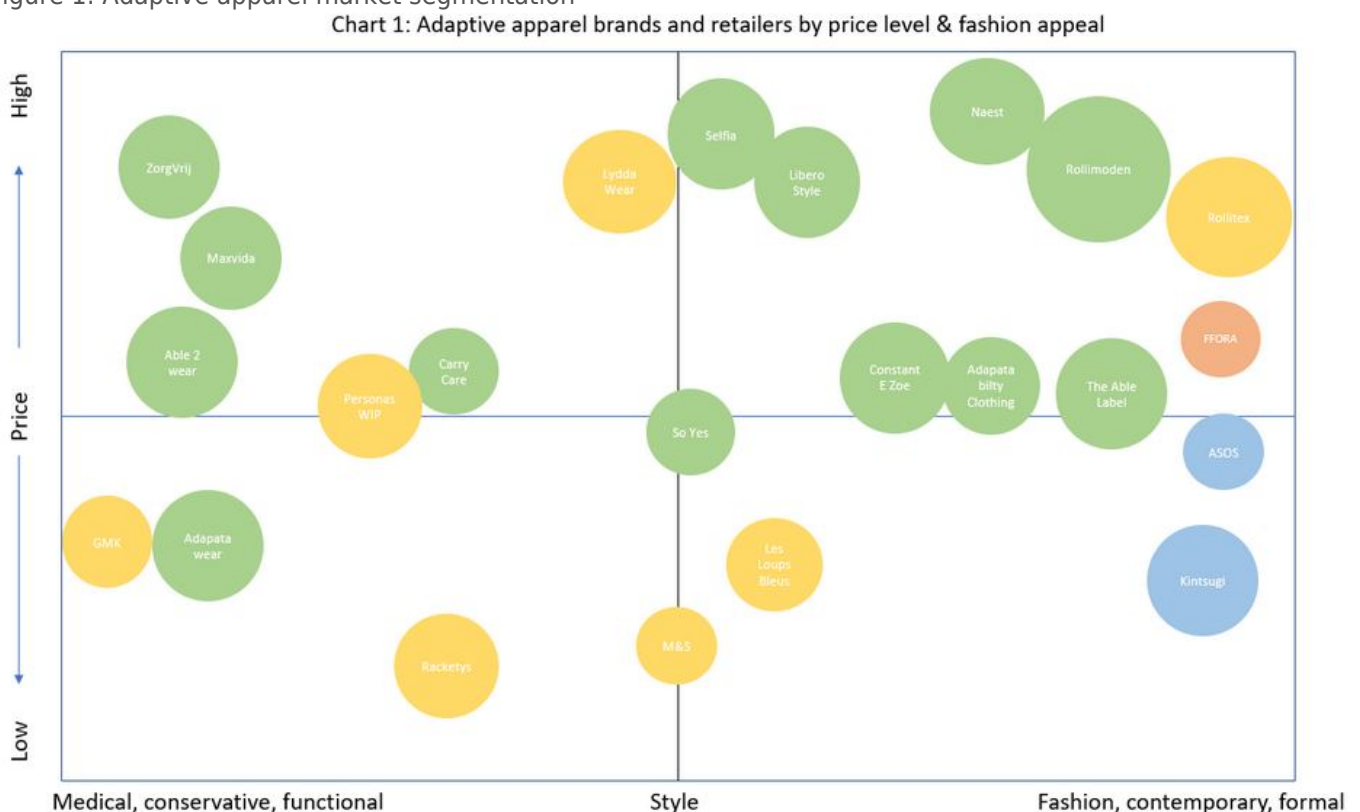
2. Through what channels can you get adaptive apparel on the European market?

Before you start to approach European buyers, you need to determine what market segment fits your company best and through what channels you want to sell your product. Adaptive apparel has been available in Europe via dedicated print catalogues historically, but those have largely been replaced by e-commerce channels. Mainstream fashion brands have recently introduced adaptive versions of their fashionable collections.

How is the end market segmented?

Because adaptive apparel caters to a broad range of different consumer groups with very specific needs, it makes sense to classify European buyers of adaptive apparel by different criteria: price-quality level, target group and fashionability.

Figure 1: Adaptive apparel market segmentation



Size of bubble is intended as a hint on how wide the product range is. Price levels are an approximation and may change.



The upper market for medical, conservative, functional styles

European brands such as [Able2Wear](#) and [Personas WIP](#) provide adaptive apparel in classic styles in a wide size range, catering to senior citizens. People over the age of 65 represent approximately 20% of the population in Europe, of which approximately 45% have some kind of disability. Women over 65 represent the largest consumer group in this market. Styles show very little seasonality, colour and variation. Much of the adaptive apparel in this segment, including hosiery, legwear, underwear and footwear is sold by medical equipment retailers alongside hardware and mobility aids.

The lower market for medical, conservative, functional styles

Brands such as [Adaptawear](#) and [Rackety's](#) also cater to more conservative, practical consumers, but offer adaptive apparel at lower price points. Children's adaptive apparel companies in this segment similarly focus on basics, underwear, nightwear, polo shirts and jogging pants. Approximately a quarter of adults above 16 have some kind of disability, while 15% of children do. However, children represent the most underserved demographic within the market. The range of adaptive clothing available for children is even more restricted than for adults, especially for fashion-conscious children in the ages from 10 to 12 and teenagers from 13 to 18.

The upper market for fashionable styles

Fashionable luxury American brands such as [MagnaReady](#) and [Tommy Adaptive](#) lead the adaptive apparel industry in the US and Europe. In the upper-middle and middle markets a small number of web shops selling more fashionable styles, like [Ffora](#) and [Rollitex](#), has emerged recently. Such companies are expected to grow because they understand that just like any other target group, people with disabilities also lead active social lives and appreciate fashionability.

The lower market for fashionable styles

In the lower-middle and budget markets, some general fashion retailers and multi-brand online apparel platforms have started selling fashionable adaptive apparel, like [Asos](#), for example. The relatively new and fashionable adaptive apparel brand [Kintsugi](#) has also entered this market.

Table 2: Selected European adaptive apparel companies and their position in the market

Company name	Price-quality level			Fashionability			Order quantities		
	low	mid	high	basic	mid	high	low	mid	high
Naest			x			x		x	
Rollimoden			x			x	x		
Selfia			x		x		x		

Tommy Adaptive			X			X		X	
Zorgvrij			X	X				X	
Libero Style			X		X	X		X	
Rollitex			X			X	X		
Damart									
Able2Wear		X		X			X		
Personas WIP		X		X			X	X	
Constant E Zoe		X			X	X	X		
The Able Label		X				X	X		
Ffora		X				X	X		
Asos	X	X				X	X	X	
GMK	X	X		X			X	X	
Kintsugi	X					X	X		
Racketys	X			X	X		X	X	

Tips:

Consider making regular, non-adaptive product ranges more adaptive friendly. Velcro closures, for example, have replaced shoelaces on many shoes for young children and adults as a style choice, but this kind of facilitates access for consumers with special needs and disabilities.

Do not focus exclusively on the clinical features of your product, but try to make your adaptive apparel designs more fashionable. If your company is not yet ready to design and produce stylish adaptive apparel, make it so.

Awareness about the need for adaptive apparel is growing, thanks to the work of advocacy groups, like [Runway of Dreams Foundation](#). Check which companies they already work with and look out for new adaptive apparel companies entering the market in the coming years.

Through what channels does the product end up on the end market?

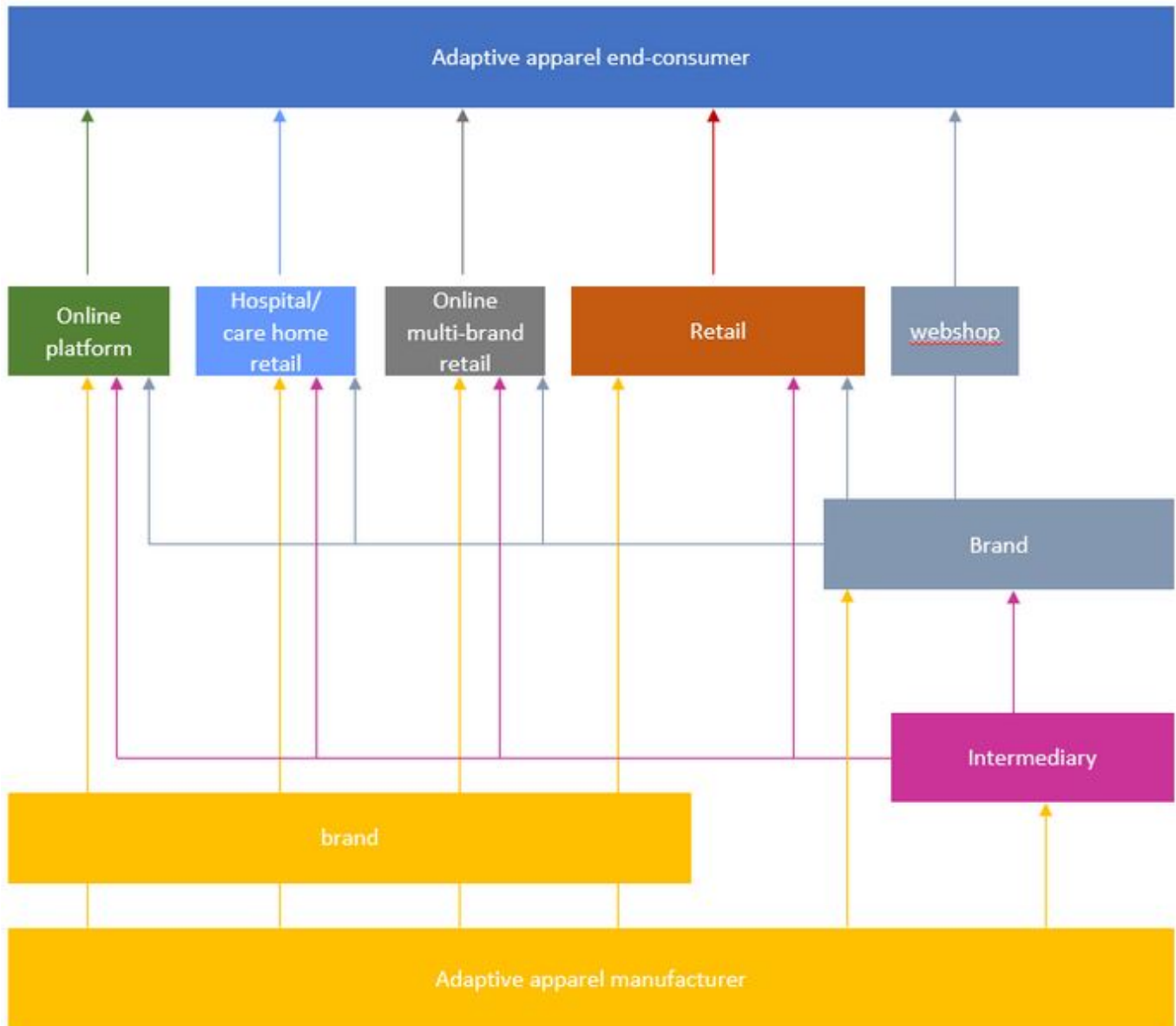
The most marked difference among your potential buyers is their place up the value chain, because that will determine how they do business with you. Within each part of the value chain, you will find buyers of different

market size, with different requirements regarding certification, quality MOQ and price.

Each type of buyer requires a specific approach. Always try to find out in what part of the value chain your buyer is operating, what challenges they face in the market and how you can contribute to their sales strategies.

- If you want to target European end consumers directly, try selling via platforms such as [Amazon](#). Most online consumers can be found in countries in Europe's northwest. You will need to invest in a web shop, stock and order management, and customer service. Your biggest challenge will be return policies.
- Online multi-brand retailers such as [Asos](#) sell existing brands and develop their own private collections. They are extending these collections to include adaptive features, sometimes [in collaboration with Paralympic athletes](#). These adaptive versions of existing styles are usually available online rather than in-store.
- Retail stores that sell adaptive apparel tend to specialise in mobility aids for people with disabilities. They stock only a very small selection of functional garments, like slippers and incontinence underwear. Two exceptions are [Damart](#), with more than 100 stores in France, Belgium, Switzerland and the UK and [Ability Superstore](#), which sells both online and in physical stores in the UK.
- Most adaptive apparel brands such as [Rollitex](#) and [Able2Wear](#) sell directly to end consumers via their own websites. This is because the wholesale model of brands selling to retailers is not well established in the adaptive apparel sector. Other brands such as [Zorgvrij](#) (Netherlands) present their product range on location, including in care homes and hospitals.
- Intermediaries such agents, traders, importers and private label companies, sell your product on to buyers up the value chain. They are price focused and require flexibility in quantities and qualities. Some are located near or in the production countries and primarily do sourcing and logistics, such as [Li & Fung](#). Others, such as [Dewhirst](#), work from Europe and also do market research, design and stock keeping. Their service level determines the commission rate they charge.

Figure 2: Adaptive apparel market value chain



Tips:

Be flexible. Provide MOQs of fewer than 500 units per style, which will give you a competitive advantage.

Do not assume that adaptive apparel for older consumers is appropriate for younger people. These are distinct consumer groups within the adaptive apparel market. Always take the consumers' individual needs into account.

Adaptive apparel is generally made to meet consumer-specific requirements, so consider a production setup that allows for made-to-measure products.

What is the most interesting channel for you?

If you are a small to medium-sized apparel manufacturer in a developing country, specialist adaptive apparel retailers and brands, alongside multi-brand online platforms are likely the most interesting types of buyers for you.

Specialist retailers and brands

Specialist retailers and brands work at a higher price point than mainstream fashion retailers and change their collections less frequently. This makes them the most interesting channel.

Your buyer will teach you how to alter patterns to match different fits and will tell you where to source modified trims, such as using magnets to replace buttons. Be aware, however, that the development phase can take several months as the sampling may be repeated multiple times to get the fit and the cost price approved.

With both retailers and brands, order quantities will be small (500 and below) and size ranges wide. If you can be flexible, you will have a competitive advantage over larger manufacturers with high MOQs.

Online multi-brand retailers

Online platforms like Zalando, Asos and even Amazon may be interesting buyers because these companies develop their own private collections of adaptive apparel. Be aware that you need to study the market and its needs very well and you need to have the technical expertise (in pattern making, example) to service these buyers.

Tips:

Find potential buyers on the exhibitor list of trade fairs, such as [Naidex](#) (UK), [Rehacare](#) and [Werkstaetten](#) Messe (Germany) and [Salon Autonomic](#) (France), even if you do not plan to attend. If you do plan to meet potential buyers at a fair, check what collections they have, buy one or two of their items and prepare matching or even improved samples. Work out the costing as well before you introduce your company and your samples to a potential buyer.

Attend fitting sessions with the buyer to understand their pattern, fit and styling requirements, which will reduce the number of reworks.

Conduct 50-hour wash and wearer trials with wearers across different sizes and share this information with your buyer. This way fabric and styling issues can be corrected before you start production.

3. What competition do you face on the European adaptive apparel market?

American brands used to have the advantage of being first in the market for adaptive apparel, but European brands are now catching up. If you are prepared to be flexible, you can grow along with your buyer in this promising market. Be aware that the market for adaptive apparel in individual European countries is often connected to health insurance companies.

Which countries are you competing with?

Bangladeshi producers specialise in making cheap, basic apparel, especially children's wear. The country benefits from low production costs and the [Generalised Scheme of Preferences](#) (GSP), which removes duties when exporting to the EU. The biggest challenge for Bangladesh will be to increase technical expertise, facilitate smaller orders and to get more factories to comply with international safety and sustainability standards.

Technical innovation, high efficiency, excellent customer service and local availability of fabrics and trims give Chinese manufacturers an advantage over competitors in developing countries. Some Chinese factories have advanced pattern cutting skills and can grade the full size range that brands find useful for achieving fit approval. Downsides for Chinese producers include high MOQs, rising labour and production costs and not being

part of the GSP.

India is a good source of cottons and has a well-developed garment industry including smaller factories which can provide flexibility and lower MOQs. These benefits are very relevant for buyers of adaptive apparel. The country benefits from the GSP.

Nearshore Morocco is a specialist in denim production suitable for brands offering fashionable jeans adapted for wheelchair users. The location close to Europe makes it easier for factories to work closely with buyers on product development.

Within the EU, Portugal offers low MOQs and high flexibility, which is particularly relevant for some of the smaller adaptive apparel brands. Portuguese factories source some raw materials from Europe and Turkey which provides the benefit of shorter lead times, but at a higher cost than Asian production countries.

French brand [Naest](#) manufactures their products in France, providing full traceability and control of the supply chain, but at a high price point.

Tips:

Visit international fashion trade fairs, such as [Naidex](#) (UK), [Rehacare](#), [Werkstaetten Messe](#) (Germany) and [Salon Autonomic](#) (France) to learn more about the companies you are competing with and the countries where they are installed.

Read [Prescouter's Intelligence Brief on the adaptive apparel market](#) and follow trade media, such as [Vogue Business](#), to learn about drivers and innovations in this market.

Check how other countries benefit from the Generalised Scheme of Preferences on [the European Commission's website on international trade](#).

Study the conditions in the countries where your competitors are, compare their strengths and weaknesses to yours and promote the competitive advantages of doing business with you. Besides GSP, consider factors such as distance to Europe, [ease of doing business](#), [transparency](#) and [CSR risks](#).

Which companies are you competing with?

Adaptive apparel is also produced by regular apparel factories. You will find no manufacturers that specialise in adaptive apparel and promote themselves as just that. This offers an opportunity for any manufacturer that wants to specialise and target this market.

As with any market, it is very important that you promote your company's unique selling points (USPs). Good quality, competitive price level and on-time delivery are not USPs — they are non-negotiable requirements. Unique selling points are features of your organisation that make you stand out in the crowd of suppliers. In the adaptive apparel industry, the three most important USPs for producers are flexibility (low minimum order quantities for what is still a niche market), product development and workmanship. Other important qualities include extra-fast delivery, high service levels, transparent supply chain and good corporate social responsibility strategies.

Tips:

Check the free online database [Open Apparel Registry](#), which allows you to look up the suppliers of hundreds of European fashion brands.

Most online search engines will let you create a 'news alert' on a topic, so you can automatically follow the latest developments in the apparel industry in a specific country.

Read the CBI study [10 Tips for Doing Business with European Buyers](#) to learn how to approach and engage with buyers. This report also describes how you can get practical help with understanding European business culture, analysing your USPs and doing business with European buyers.

Advertise your company as a factory that is specialised in producing adaptive apparel. On your website and company profile, promote your workmanship, product development skills, machinery, employees, references and mention your minimum order quantities.

Which products are you competing with?

Sportswear and tailor-made apparel are the two strongest competitors to adaptive apparel.

Sportswear

The closest competitor to adaptive apparel is sportswear, which uses stretch fabrics, elasticated waists and flat seams. End consumers look for these and other features in sportswear items as replacement for adaptive apparel. American sportswear brand Under Armour, for example, [includes adaptive apparel features like sensory friendly materials](#) in its apparel.

Nike, which is also American, has developed [self-lacing shoes](#) which electronically adjusts to the shape of a person's foot. A smartphone app helps in the adjustment process. Global sportswear brands appear to be increasingly moving into the adaptive apparel market, but their styles do not cater to people who may want to dress formally.

Tailor-made apparel

Consumers who cannot find the adaptive apparel they want or need, tend to turn to tailor-made apparel or make modifications to ready-made garments. This is costly, time consuming and overall less convenient. [Beaneezy](#), for example, provides made-to-measure apparel for children and adults with medical needs. [Zipsnap](#), [Sunrise](#) and [Habicap](#) are similar adaptive apparel companies, working from France.

Tips:

Offer specialised products for end consumers based on their specific disability. See [Silverts](#), for example, an adaptive apparel brand that lets consumers select styles based on their personal situation.

Try to target specific subgroups by integrating wearable technologies in your designs, such as pedometers, heart rate, blood pressure sensors, etc.

Consider setting up a leasing scheme of your adaptive apparel, including cleaning and refurbishment, preferably in collaboration with your buyer in Europe.

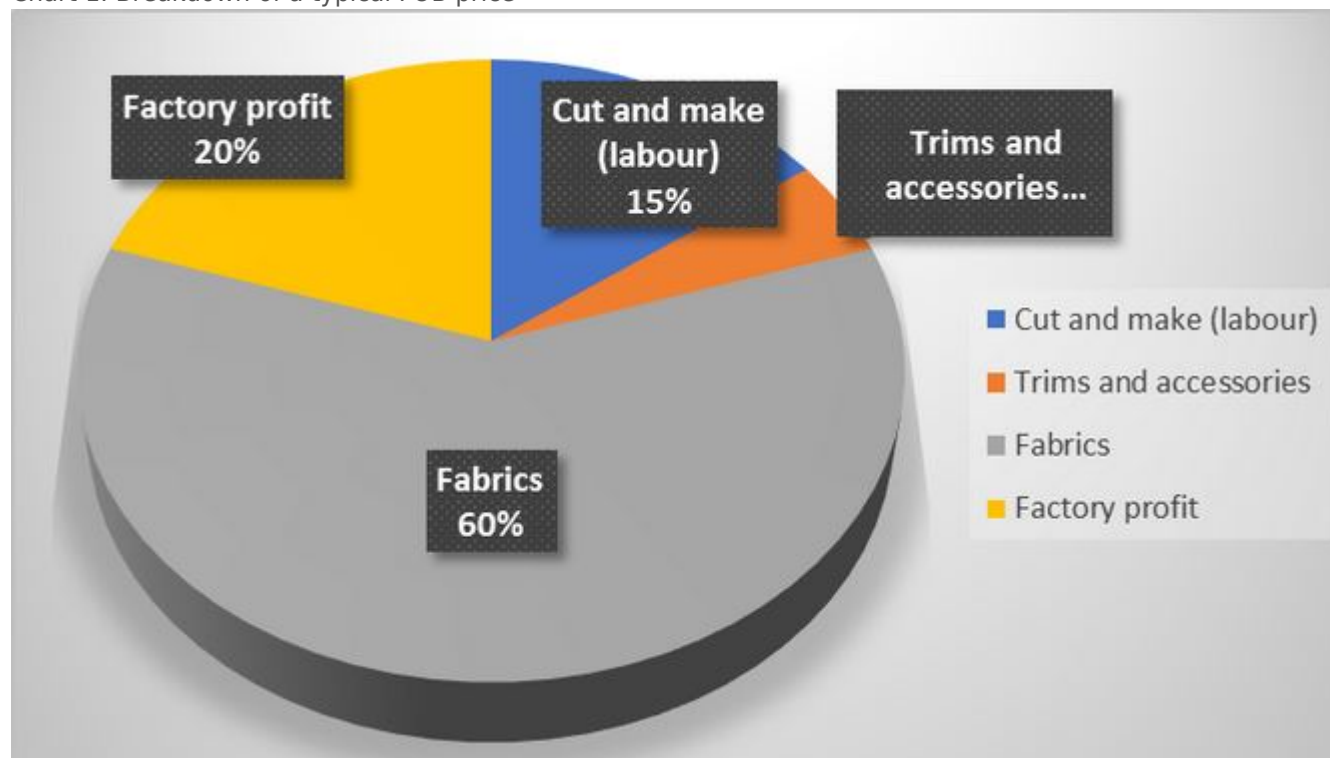
4. What are the prices for adaptive apparel on the European market?

The factory price of your product, which in the fashion industry jargon is your FOB price (for [free on board](#)), is

influenced by many factors, including the cost of materials, the efficiency of your employees, your overhead and profit margin.

The following chart shows the average cost breakdown of a typical FOB price:

Chart 1: Breakdown of a typical FOB price



Note that these percentages may vary per factory and per order. Some factories accept lower profit margins during offseason periods or when order volumes are high. In addition, the percentages for labour versus fabrics may vary, depending on the efficiency and wage level of the workforce and the price of the materials. Efficiency goes up and material prices go down when producing large volume orders.

Tips:

Study different product ranges and try to improve products with the largest volume potential.

If you focus on volume, study existing products and materials that provide similar comfort and quality but are more price aggressive.

In case you target the high-end market, focus on using innovative new materials that increase the comfort of the consumer but always try to keep a competitive price level.

Retail pricing

The retail price of adaptive apparel items is on average four to eight times the FOB price, which is called retail markup. It follows that the FOB price is on average 12.5%–25% of the retail price of the product. Exceptions do exist. In the budget market, some large European retail chains may sell products for a markup of just twice the FOB price. Retailers mark the FOB price up four to eight times because they need to account for import duties, transport, rent, marketing, overhead, stock keeping, markdowns, VAT (15%–27% in EU countries), among other costs.

According to [Eurostat's 2018 comparison of retail prices for apparel](#), France has the highest price level among


the top six apparel and footwear importer countries at 109.9 points compared to the European average of 100, followed by Belgium (106.4), the Netherlands (106.3), Italy (101.1), Germany (99.1), the UK (92.7) and Spain (92). Note that brands and retailers that sell in multiple European countries usually keep prices equal or deviate only slightly from the standard retail price.

Online commerce, a strong budget segment and intense competition have made consumers in Europe accustomed to low prices. Focus on sustainability and higher production costs have, at the same time, put manufacturers, suppliers and buyers under enormous price pressure. Prices are expected to remain stable in the next three years, thanks to increased efficiency, automation and the trend of production shifting to low-wage countries.


This study has been carried out on behalf of CBI by [FT Journalistiek](#).

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