Position Paper

ORGALIME

Brussels, 25 February 2013

Orgalime comments on
CEN-CENELEC "European Standardisation Strategy 2020"

1. INTRODUCTION

Orgalime has always been and remains a major supporter of the European Standardisation System (ESS). Our industry stakeholders are by far the largest users of CEN and CENELEC catalogues of European and harmonised standards. Manufacturing companies in the electrical, electronic, mechanical and metalworking fields are also the primary users of harmonised standards, especially those referenced in the OJEU under New Approach directives, such as those applicable to machinery, pressure equipment, gas appliances, low voltage equipment, electro-magnetic compatibility, radio equipment, measuring instruments, equipment working in explosive atmospheres, and a growing number of directives applying to eco-design, energy efficiency, recycling and the broader protection of the environment.

We welcome the ambition of CEN and CENELEC to pave the way towards a modern, cost-effective and efficient standardisation in Europe and to world market access for European-based companies and appreciate being involved in the definition of their European Standardisation Strategy 2020".

While we are supportive of many of the elements contained in the draft strategy document, we nevertheless have some concerns about the approach sketched in the draft document, which was circulated for comments on 15 January 2013.

2. GENERAL COMMENTS ON CEN-CENELEC VISION FOR 2020

Orgalime believes that the first part of the paper which groups "Preamble", "Context" and "Our ambitions for 2020" is perhaps too unspecific and developed in comparison to the last part of the document "Our objectives to get there", which contains some more concrete proposals.

In addition this first part includes very often statements, which we believe overestimate the potential role of standardisation to service society at large. This is particularly the case with regard to innovation, growth and competitiveness as well as other challenges such as climate change or ageing population. Such challenges require political will and legislation first. Standards may then constitute effective supportive tools for stakeholders to address solutions in their respective environment.

The real strength of the European standardisation system, which is still essentially driven forward by voluntary experts from industry and other businesses, lays in its ability to provide concrete (technical) specifications to facilitate and support the transposition of such measures in daily practice, provided that standards will remain attractive to companies and organisations that may use them on a voluntary basis. While this reality may make European standardisation seem less

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promising for European lawmakers, it would remain in our view of great value to society. The more standards meet market and other stakeholder needs, the greater their value in support of meeting societal challenges. However, the European New Approach is a very successful example on how standardisation can support companies meet policy objectives that are set in EU legislation.

Therefore, we believe that CEN and CENELEC members should build their vision and strategy around what matters most to their primary stakeholders, and translate it effectively and efficiently in their ambitions for 2020 and their concrete objectives to get there.

3. ORGALIME COMMENTS ON CEN AND CENELEC AMBITIONS FOR 2020

- **About wide recognition**
    - **The market test must remain the basic driver of standardisation activities;** no "*new areas for standardisation*", no "*new anticipated standardisation needs*", whether requested by the European Commission or not, should be sought out ("*seek out*" in the document), accepted and launched without a market-relevance test from the main stakeholders of the standardisation process, that is the product manufacturers, including systems suppliers and service providers, and their customers[1];
    - European standards cannot "*generate investment confidence for businesses*" and standardisation cannot "*attract first-rate European expertise*" otherwise. Therefore, it is highly unrealistic to over-estimate their potential. The sentence "*European standardisation issues will be at the forefront of economic decisions and at the heart of business growth*" is in our view somewhat wishful thinking, unless much more is done at a political level and on the ground to develop effective education about standardisation and its benefits.

- **About innovation and growth**
    - **The inclusion of research results in standardisation should be as appropriate as requested by the market**; CEN and CENELEC should respond to such needs only where deemed fit by industry stakeholders;
    - **Orgalime welcomes efforts to build better ties between standards and innovation**. **However**, we are cautious of the idea of standardisation anticipating the effect of innovation on society, without due consideration for the feasibility of its take up by the market(s) first.
    - **Orgalime supports potential standardisation activities in the field of services**, **but where deemed relevant by service providers only**. We disagree to a top-down approach, which would pretend to "*harmonise*" the European market for services by setting "*a benchmark in Europe and beyond*" without the clear support of service providers concerned.

- **About a sustainable system**
    - **There will be less industry involvement and financing for European standardisation if there is no systematic market relevance checks**, including for accessing world markets;

4. ORGALIME COMMENTS ON CEN AND CENELEC OBJECTIVES TO GET THERE

1) **Provide proactive input in or support to the international standardisation in the interests of Europe's leadership role in the global economy.**

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[1] Cf. Orgalime position paper on market relevance of standards ([29/05/2007](#)).

While we support the idea, we believe that CEN and CENELEC should not give the impression that they will act as competitors of ISO and IEC.

- o **Orgalime is overall supportive of the following action points with a few of amendments:**
- Increase European influence in international standardisation's corporate and technical policies. Europe to lead the work of ISO and IEC where European industry is strong.
- Create strategic alliances and partnerships to promote the value of international standards in providing market access and harmonisation, and to encourage a common approach at the regulatory level worldwide, including in fighting against national standard deviations.
- Become a genuine partner of the European Institutions in their regulatory dialogues and Free Trade Agreement negotiations with third countries to ensure that a European New-Approach-like legislation and standardisation is appropriately addressed.
- Promote the use of European and international standards as the reference for product conformity assessment and legitimate access to markets.

- o **Orgalime suggests the following missing point:**
- Support improvement of acceptance of ISO and IEC standards in other regions in the world;

2) **Be an efficient and effective provider of market-responsive products and services reflecting the evolving needs of our customers.**
- o **Orgalime is overall supportive of the following action points with a few of amendments:**
- Be responsive to market needs which were identified by the main stakeholders that would benefit from a first-mover advantage for Europe.
  - → *Orgalime comment: it is not the role of ESOs to intervene in business strategies or top-down market access policy planning. Market knows better, always.*
- Engage with the research community to ensure the early inclusion of its results in standardisation, wherever supported by identified industry or business stakeholders.
- Create on the request of concerned stakeholders specific communities of interest around promising high growth areas for Europe to drive technological innovation and foster standardization of systems for an integrated approach.
- Develop products and services, including more flexible standard products, which are more attractive, i.e. easily understood, responsive to end-user needs, and provided in a timeframe required by the market.
- Actively promote the extension of the New Approach concept to all sectors, including services.
- Evolve European standardisation subjects to consider significant demographic, societal and environmental changes.
  - → *Orgalime comment: Change 'address' into 'consider' and the order of this item as last in the paragraph. Reason: we believe that the role of European standardisation should not be too ambitious. Meeting the objective under paragraph 3 to "strengthen the engagement of all stakeholders" ought to be sufficient in this respect.*

- o **Orgalime suggest the following missing points:**
- Ensure a better involvement of industry and other relevant stakeholders in the governance structure of CEN and CENELEC (e.g. for consultations on standardisation policy matters).
- Develop processes and tools to make an optimal use of new technologies that are user-friendly and meet the needs of standards developers.

3) **Widen our network to ensure effective participation of all interested parties in an inclusive and engaging system.**
   o **Orgalime is overall supportive of the following action points with an amendment:**

- Strengthen our engagement mechanism for all businesses, societal and environmental stakeholders, to ensure that they can effectively participate at all levels.
- Ensure that public interest is adequately reflected in standardisation activities through the full involvement of regulatory bodies and market surveillance authorities.
- Strengthen best practice and coherence across the membership to further enhance the quality and inclusiveness of the European standardization system.
- Increase our membership to foster greater market harmonisation with appropriate trading partners.
- Significantly raise public awareness of the role and importance of standardisation to ensure that it is embedded in companies' strategy and career development policies, and into all education levels and curricula, thereby encouraging the young generation of experts to get involved in standardization activities, knowing it will enhance their careers.

4) **Develop a strong, adaptable and sustainable business model that adds value for our customers and to the European economy.**
   o **Orgalime is supportive of the following action points, including sound alternatives to the selling of standards by NSBs and copyright management, which are practically and sometimes politically challenged in several countries and business areas:**

- Develop a robust business model to ensure the financial sustainability of the European standardisation system.

  → *Orgalime comments:* ***the financial sustainability of the European standardisation system is*** *one of the core points that needs to be developed and* ***where we believe that more thought should be put if the strategy is to translate into results.***

- Facilitate efficient governance and administrative reforms to deliver cost-savings for members and customers alike.
- Deliver new commercial services, including "à la carte" ones, to reflect the changing needs of the market place.
- Exploit innovative production and delivery mechanisms that are suited to a digital world in the interests of an efficient connected network and of the needs of our customers.
- Build on the diverse strengths of individual members to create value for the system.

  → *Orgalime comments:*
  - *DELETE the whole of the last point. Reason: it is not sound for an organisation to set to itself as a strategic objective the reinforcement of its own servicing structure. The CEN-CENELEC Management Centre should support its members, with the means that they would adequately allocate to that purpose.*

- Promote the European standardisation identity and brand inside and outside Europe.

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