



Mr Antonio Tajani
Vice President
European Commission
responsible for Industry and
Entrepreneurship
B – 1049 Brussels

Brussels, 21 February 2014

Subject: Quality versus Speed for European Standards

Dear Commissioner,

The European standardization system, as it is known today, is the result of a long-standing and successful public-private cooperation resting on a consensus-building process that involves various actors: industry, public authorities, consumers, trade unions, etc. Some 80.000 experts work in standardization on a voluntary basis, a large number of them coming from medium size enterprises. Industry bears up to 95% of the cost of the system, the remaining 5% being covered by public funding (of which 2% from EC/EFTA).

Almost 4.000 European Standards are cited in the EU Official Journal. 30% of European Standards directly support companies' compliance with EU Directives thanks to the presumption of conformity with their essential requirements.

This ensures the production of state-of-the-art, high consensus deliverables that are widely accepted by the market that provide numerous benefits for both industry and the public sector, ranging from cost reduction to increased competitiveness.

According to our understanding, Regulation 1025/2012 is a means to introduce a stable legal framework to optimize the excellent public-private partnership in existence.

However, as of today the European Commission (EC) has not agreed and signed a Framework Partnership Agreement with the ESOs. This situation prevents ESOs to legitimate their activities in support of European Policies and Legislation even if Article 17.5 of the Regulation requires this to be communicated to the Council and Parliament.

One of the main reasons for the lack of progress is the EC position regarding Key Performance Indicators for the CEN and CENELEC performance, which are neither relevant nor realistic or coherent with the European Standardization policies and ambitions.

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In particular, the emphasis given to a further reduction of development time by 50 percent and conditioning 50% of the EC co-funding to the ESOs thereon ignores all the efforts that have been made so far: from an average of 6 years in 2000 to 4 years in 2007; down to 2,5 years in 2013.

This pre-requisite for increased speed to co-sign the framework agreement is not compatible with the high consensus level that is aimed at by the CEN and CENELEC process and which is needed especially for addressing both public and private expectations from European standards, including:

1. **Quality of European standards** which help ensuring market satisfaction and prevents the need for possible safeguard actions by the Member States. Increased speed would particularly impact those deliverables that fall under the New Approach concept, or where difficult market conditions require economic actors to spend more time to find a stable solution that could support fair competition in the market.
2. **Market relevance and stability**, especially in some sectors, such as construction, machinery or electrotechnology, where there is a preference for stable standards even if it takes more time to provide them, due to the significant investment implied by the application of the standards. Time to develop standards should remain in the hands of the parties involved for each standard or package of standards.
3. **Openness and transparency**. Increased speed would impact stakeholders' access to standards' development, especially SMEs, consumers and societal stakeholders – the exact same groups that are supposed to be strengthened by the European Standardization package.
4. **Global market access** and promotion of European technology outside the EU. Increased speed also impacts ESOs' ability to ensure coherence and optimize the benefits from the international activities, bearing in mind e.g. the Vienna (CEN-ISO) and Dresden (CENELEC-IEC) agreements. To succeed in developing international standards with consideration of European input normally takes more time, but provides access to the global market and not only the European one.

CEN and CENELEC are continuously looking into their working practices and processes and aim to benefit in particular from the electronic means that are available for enhancing the consensus-building process. However, a further reduction in process time of 50 percent without any qualification of this general objective is neither relevant, nor realistic.

Due to the difficulties in identifying generic KPIs, we would strongly suggest to include relevant KPIs in the specific contracts, rather than in the FPA. Apart from speeding up the administrative process, It will introduce a dynamic mechanism that can be adapted and evolve according to the EC's , ESOs' and relevant stakeholders' changing needs.

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We are confident that you will understand these concerns and invite you and your services to replace the approach followed so far by a dialogue and exchange with the ESOs to make sure that indeed the European standardization system fits for purpose in a sustainable way.

Looking forward to receiving your reply

Yours sincerely



Friedrich Smaxwil
CEN President



Tore Trondvold
CENELEC President

Co-signatories



ORGALIME
Sandro Bonomi
ORGALIME President



Marcogaz
TECHNICAL ASSOCIATION
OF THE EUROPEAN NATURAL GAS INDUSTRY
Marc Florette
Marcogaz President



CECAPI
Georg Luber
CECAPI President



ANEC
Arnold Pindar
ANEC President



ECOS
Pieter de Pous
ECOS President



FIEC
Thomas Schleicher
FIEC President



Where manufacturing begins
cecimo
Jean-Camille Uring
CECIMO President



Europeacable
Frédéric Vincent
Europeacable President

Cc:

Mr Daniel Calleja Crespo, Director General DG Enterprise and Industry