



Commission's discussion paper on Integration of Environmental aspects into Standardisation (June 2002)

Orgalime Position Paper¹

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Orgalime represents the mechanical, electrical, electronic and metal working industries of 21 European countries. Its 31 member federations represent over 100 000 companies of all sizes. With production valued at 1200 billion euros in 2001, and employing 7.6 million people, the engineering industry is the largest industrial sector.

Orgalime welcomes DG environment and DG Enterprise's joint consideration on how to make better use of standardisation as a tool in environmental legislation, thereby taking a first practical step towards examining the feasibility of applying some of the principles of the New Approach to the area of environmental legislation. In the present position paper we comment on the issue, as well as providing answers to the questions raised by the Commission in its discussion paper on the integration of the environmental impact into standardisation, circulated on 14 June 2002 to stakeholders.

Executive summary

In responding to the number of practical solutions put forward by the Commission, Orgalime is pleased to recall in the following paper its core views on European standardisation and how it could integrate considerations on environment protection:

1. Standardisation is a voluntary process, which must be relevant and attractive to all stakeholders.
2. It is essential to examine very carefully how standardisation can effectively be applied to areas such as environmental protection.
3. Our industry is proactive and open to dialogue with NGOs.
4. There is a need for better awareness and to transfer experience on environment conscious design.
5. Cultural changes in companies in accordance with ISO and IEC Standards and guidelines dealing with environmental aspects are to be encouraged.
6. To become more attractive, the use of international environmental management standards should provide real added value to companies.
7. The making of quality standards does not require environment champions.
8. One should not make life cycle assessments (LCAs) mandatory and not use databases set up to help designers and standardisers for public procurement purposes.
9. Existing international guidelines should continue to be used. There is no need to change the standardisation structure in Europe, although it could be improved.
10. No uniform assessment method is required, but a workable and objective evaluation.
11. The greening of European standardisation should not hamper its open consultation procedures, which prevent environmental requirements from becoming technical barriers to trade (TBT).
12. All stakeholders should take part in the standardisation process at national level, right from the beginning.
13. Mandates should not transfer political decision onto the standardisation bodies; they should reflect a balance between environmental aspects and other aspects such as health and safety.
14. Not only NGOs but also SMEs need help. Incentives at national level for both are necessary.

¹ The present position is supported by EICTA: European Information and Communication Technology Association. www.eicta.org

Integration of Environmental aspects into Standardisation

General considerations

ORGALIME recognises the relevance of integrating environmental considerations in the design of products with a view to achieving a continuous improvement in the environmental impact of products placed on the market. Today environmental features of products are increasingly written into product requirement specifications and should be further integrated into standards through a business-driven process, which is voluntary, open and attractive for all stakeholders, including NGOs and SMEs.

Orgalime therefore believes that it is essential to examine very carefully how standardisation can effectively be applied to the area of environmental protection. The development and use of standards are based on a product related risk analysis, which requires clearly measurable assessment values. Generally, producers and enforcement authorities are capable of applying these rules, conducting most of the assessments themselves.

Orgalime is unsure whether it is feasible to apply standardisation not only to products but also to processes and services: For them it would be difficult to set up measurable values for the whole life cycle of products; the interpretation of such values could also give rise to problems of application and inconsistent market surveillance across the EU member states. It may be most effective to tackle certain issues with more flexible guidelines and technical reports and provide support for implementation, particularly to SMEs. We believe also that existing harmonised standards need to be updated or new standards created to cover the essential requirements of new directives implementing the New Approach to areas other than safety and health protection.

Orgalime supports the ongoing process of developing guidelines and standards on environment conscious design (ECD). The concrete description of environment conscious design must be done in the Technical Committee responsible for the product standards. However, Orgalime is concerned that integrating environmental requirements into product standards tends to set a common minimum level of environmental performance, which may stifle competition for “greener products”.

It is also necessary to consider other workable tools to allow manufacturers to benefit from the presumption of conformity. We believe that among the options to consider, “Voluntary Agreements” or “Codes of Conduct” can play a relevant role as voluntary tools that provide presumption of conformity to the essential requirements and supporting sustainable development.

Detailed comments

PROMOTING USERS' AND EXPERTS' AWARENESS OF ENVIRONMENTAL CONSIDERATIONS (SECTION 1 AND 2 OF COMMISSION DISCUSSION PAPER)

Our industry is proactive and open to dialogue with NGOs

The engineering industries, which Orgalime represents, have already made significant efforts both at a national and sector level to improve the environmental performance of their products, by incorporating environment conscious design (ECD) criteria into product development and by integrating environmental protection in the production process.

Many of the leading engineering companies have dedicated significant resources to environmental management issues and to sharing their vision not only to their customers and shareholders, but also to the public at large.

Our industry is therefore open to pursuing the same dialogue at the level of standardisation with representative NGOs, including on integrating the environmental dimension into product policy. While we welcome the commission's drive to facilitate exchanges between stakeholders in the standardisation process, Orgalime believes that this process must take place, as it does today in many countries, in the national standardisation committees where NGOs should be able to participate in the same way as other stakeholders. The participation of all stakeholders in the standardisation process is the best way to ensure that this essentially democratic and transparent process is maintained.

There is a need for better awareness and to transfer experience on environment conscious design

Orgalime member associations have already taken up the challenge of educating and training SMEs in Environment conscious design: a number of Orgalime members are offering training workshops and have developed or are developing manuals for applying Environment conscious design to specific sectors of our industry. Our industry has not awaited the publication of legislation to launch this proactive approach.

However, we are conscious that the transfer of this knowledge and its application will take time, particularly for SMEs. It is for this reason that, while commenting on the draft EEE Directive, Orgalime suggested a 10-year transitional period.

For SMEs in particular, there is in many cases a long way to go to come to a general understanding of environment conscious design and assessment of the environmental aspects of their product design.

There is a need for all players (the Commission, member states and industry organisations) to plan and organise support activities on how to integrate environmental aspects into product design, and use available European and international guidelines. We would welcome the Commission providing industry with encouragement and support in this area.

Cultural changes in accordance with ISO and IEC Standards and guidelines are to be encouraged

In order to help optimise overall performance, companies must realise their responsibilities and make sure that their staff is committed to permanent improvement, in terms of environment effects, of the company's activities, products or services. This can be achieved through continuous monitoring and evaluation of realized actions and by planning and implementing appropriate new measures.

Therefore, Orgalime is of the opinion that the implementation of an environment management system (EMS) can bring useful tools, both for the

environment and the company, and basically supports any project and programme focusing on the assistance of companies, which implement an EMS.

Many examples taken from company members of Orgalime national federations, show that the implementation of an EMS brings positive results to both the company and the environment:

- reduction of consumption of natural resources, energy, water, and reduction of waste and other emissions
- reduction of risk potential
- improvement of security to be in compliance with legal requirements
- structuring management to take environmental aspects into account
- better commitment of employees for their company and also for the environment
- capability of satisfying the environmental request of the customers.

Those examples show that companies consider an EMS mainly as an internal tool which helps them obtain the advantages described above, and that a third party certification system is not necessary.

To become more attractive, the use of international environmental management standards should provide benefits to companies

Environmental regulations at national and EU level have already created a dense labyrinth of requirements. Companies who have adopted an environment management system (EMS) with the aim of improving their overall environmental performance, should receive benefits, either if registered under EMAS, certified on the basis of ISO 14001 or even if self-declared (e.g. on the basis of EN 45014).

Orgalime believes that considering industry's goal to facilitate *global trade*, it is appropriate that international management standards could give presumption of conformity, if environment conscious design criteria are part of the EMS (e.g. in accordance with ISO TR 14062 or equivalent guidelines).

DEVELOPING MECHANISMS TO IMPROVE THE TCs' ACCESS TO ENVIRONMENTAL EXPERTISE (SECTION 3 OF COMMISSION DISCUSSION PAPER)

The making of quality standards does not require environment champions

Orgalime does not believe that environmental "champions" are necessary. There is already a considerable degree of awareness on environmental issues at the level of the standardisers: Cenelec TCs are strenuously encouraged to use IEC guidelines on environmental aspects, and CEN TCs are encouraged similarly to use ISO guidelines by the CEN Environmental Help Desk. It is important not to neglect the quality of standardisation in the pursuit of effectiveness and consensus. Quality should be ensured by the active participation of all stakeholders - each of them with their particular area of expertise - from the very beginning of the standardisation process (i.e. at national level), so that standards become generally accepted, fit-for-purpose, safer for users, etc.

Orgalime does not support the creation of so-called "environmental champions" which may lead to the certification of experts with environmental knowledge, in order to enable them to participate in the standardisation process. Therefore, Orgalime recommends leaving it up to stakeholders to define how to integrate environmental aspects into standardisation, under their own responsibility and using whatever expertise may be available to them.

One should not make LCAs mandatory...

As specified in the Commission discussion paper (under 3.4), Orgalime believes that it will be counter-productive to require the use of a specific method such as life cycle assessments (LCAs). It is a matter of fact, that there is no clear definition and no common understanding of LCAs: an internationally recommended method does not exist for the time being, and very often, relevant data cannot be provided. In particular, product designers and companies with many different changing products need the flexibility to choose the tools best suited to integrate life cycle thinking into the product design process.

...and not use databases set up to help designers and standardisers for public procurement purposes

Whereas Orgalime would support the creation of databases on the environmental impact of elements used for the manufacture of products, we consider that such databases should serve as an aid to designers and standardisers and not as a tool of public authorities for the purposes of public procurement. If public authorities were to use such tools for defining specifications of their tenders this would clearly have an impact on the freedom of manufacturers and standardisers on how best to integrate environmental considerations into products which also have to integrate aspects such as safety, performance, fitness for purpose and consumer requirements.

PROCEDURAL CONSIDERATIONS (SECTION 4 OF COMMISSION DISCUSSION PAPER)

Existing international guidelines should continue to be used

Orgalime is positive about finding ways and means in co-operation with all stakeholders to achieve that “environmental soundness” should be systematically associated with all European standards: experts should be encouraged to use existing Guidelines for integrating environmental aspects into product standards (e.g. ISO Guide 64 and IEC Guide 109).

There is no need to change the standardisation structure in Europe, although it could be improved

Orgalime welcomes the participation of all stakeholders in the standardisation process from the very beginning, and believes that this can be done efficiently within the present standardisation structures, although there are no doubts areas where improvements could be achieved. Consequently, it would not be acceptable to replace the present democratic process, and national structures, with a top down European approach.

In summary the standards bodies themselves should continue to decide on how opinion is to be represented at European level, and what voting procedures to use. The procedures have in general worked satisfactorily for many years.

TRANSPARENCY (SECTION 5 OF COMMISSION DISCUSSION PAPER)

No uniform assessment method is required, but a workable and objective evaluation

The European and International Systems of standardisation are complex, sophisticated and well-balanced systems, requiring considerable effort and resources from companies. It would be unrealistic to believe that a new system could successfully be developed at short notice.

Environmental issues are not the only aspect that standardisation has to take into consideration, but also product safety, ergonomics, etc.. Therefore, Orgalime is against a uniform assessment method as explained in section 5, which would lead to long, costly assessments, which risk to hamper the efficiency of standardisation and consequently deter industry groups from keeping investing in the current European standardisation structures.

The greening of European standardisation should not hamper its open consultation procedures, which environmental requirements to technical barrier to trade (TBT)

Orgalime does not believe that criticism of NGOs and some non-European based stakeholders levelled at the area of European standardisation is valid because the system ensures transparency -its rules are published and well known, there is democratic access all stakeholders and balanced representation: both environmental organisations and producers in Europe have the possibility of making their contribution at the national level. Moreover today more than 83% of CENELEC standards are based on IEC standards, as are 40% of CEN on ISO standards. Consequently, we believe that European standardisation is far from constituting a technical barrier to foreign trade partners of the EU, and that it fully provides support to the principles expressed in the WTO-TBT Agreement.

We note that ETSI allows direct participation of manufacturing industry, but we firmly believe that the present system of opinion forming in the mechanical and electrical fields at national level, as a preliminary stage to discussion at European level, provides every opportunity for industries, consumers, environmental NGOs and unions to provide their input into the technical discussions.

Participation at national level is currently the best way to ensure that SMEs can have a voice in the standardisation process. Most SMEs would effectively be excluded from contributing to standardisation at a European level because of the resources needed (i.e. time and cost of travel)

The existence of national mirror committees is a good way of achieving consensus. It ensures that all stakeholders, including environmental NGOs and SMEs can actively participate in the work. Hence, national particularities should be considered and addressed in the development of an international standard, if these particularities are considered to be in the public interest.

EFFECTIVE PARTICIPATION (SECTION 6 OF COMMISSION DISCUSSION PAPER)

All stakeholders should take part in the standardisation process, right from the beginning at national level

ORGALIME welcomes the participation of all stakeholders in the standardisation process: that means consumers, workers, small and medium sized enterprises and non-governmental organisations. In accordance with the principle of devolution this is necessary and it is current practice at national level.

On several occasions during the last 10 years, the Commission has suggested that anyone directly affected by European standards should be allowed to take part in the work at the European level. As Orgalime indicated in its past position papers on standardisation, most sectors covered by Orgalime see more problems than advantages in direct participation in standards work at European level. Orgalime is concerned about any attempt by the Commission to try and influence the way the views of different sections of the economy are represented during the process of drawing up and voting on European harmonised standards. The principle of delegation to the national levels in European and international standardisation is current practice and should be maintained.

MANDATES (SECTION 7 OF COMMISSION DISCUSSION PAPER)

Mandates should not transfer political decision onto the standardisation bodies.

If Orgalime believes that mandated standards have contributed to the success of the New Approach, and as a consequence of the success of the single market, mandates should not transfer political decisions to the standardisation bodies.

They should reflect a balance between environmental aspects and other aspects such as safety

The balance between different aspects such as environment, health and safety, has to be clearly assessed by the Commission in the standardisation mandates drafted for New Approach directives.

BENCHMARKING AND INCENTIVES (SECTION 8 OF COMMISSION DISCUSSION PAPER)

Not only NGOs but also SMEs need help.

Although many companies are pioneering the path to sustainable development and have developed their own set of tools, many others – especially SMEs – do lack proper resources and knowledge and would no doubt welcome some support.

Incentives at national level for both are necessary.

Consequently, Orgalime believes that there is no reason to treat individual categories of stakeholders differently. We believe that Member States should provide equivalent access to funding for NGOs and SMEs through their representative organisations and through national standardisation committees.
