



ORGALIME POSITION PAPER

European Standardisation

15/09/2005

Comments on the Commission working document “Action plan for European Standardisation”

Orgalime's 35 trade federations in 24 countries represent some 130,000 companies in the mechanical engineering, electrical, electronic and metalworking industries. The industry employs some 7 million people and includes a substantial majority of small and medium-sized companies, which generate 1,235 billion euro of turnover per year and account for over a quarter of the production and a third of the industrial exports of the European Union.

Orgalime welcomes the Commission working document with a proposal for an action plan for European standardisation stretching over a time period of four years. It is a comprehensive and ambitious paper outlining policies and ideas in the various standardisation areas, for the framework of standardisation activities, and for the challenges of the European standards on a global market.

Orgalime would like to make the following statements but also refer to its position paper dated 30 January 2004 on “The role of European standardisation in the framework of European legislation and policies”.

I. Enhance and broaden the use of European standardisation in European policies and legislation

- The draft action plan suggests that the use of standards should be both broadened and improved. We support both targets. As previously stated, Orgalime considers the New Approach the most practical option for legislation within its sector and supports new standardisation initiatives e.g. in the environmental field. Nevertheless, one may question whether the wider use of standards should be adopted as a policy by legislators rather than be seen as a sound and logical effect of market needs and tests. Orgalime certainly believes that the main influence on the work in the European Standardisation Organisations (ESOs) must originate from the stakeholders in the form of manufacturers, users and authorities.
- In point 1, the involvement of the Commission in the promotion and support of standardisation activities in the service sector is outlined. Orgalime agrees that services are an important area for continued and expanded standardisation work, but the main input and promotion must come from the stakeholders affected, not from the regulator.
- The needs for links between standardisation and both the thematic research areas of the 7th RTD Framework Programme and the proposed European Technology Platforms are pointed out in point 2. While it is true that standardisation has an important role to play in the further development of these areas and products, Orgalime also believes that a pragmatic and flexible approach is needed, e.g. through the use of new deliverables and careful market analyses. The interplay between research and development and standardisation is both complex and sensitive.

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II. Improvement of the institutional framework, efficiency, coherence and visibility of European standardisation

- The proposal for revision of Directive 98/34 is briefly outlined under the task of point 15, where the expression “the new standardisation reality” is not quite clear to us. Orgalime would like to reiterate its statement from the previous position paper that such a revision must be planned very carefully and involve all stakeholders. We support the inclusion of standardisation of services into the legal framework by making the relevant changes in the definitions of Article 1 of the Directive (to include *services* in addition to *products*).
- The support for plans to secure the financing of European standardisation system is appreciated. However, Orgalime does not favour an increase of direct Commission funding, but would rather see it invest in framework support policies that would encourage national authorities via their participation in the activities of the National Standardisation Bodies (NSBs) to increase their contributions to the system.
- The European standardisation system becoming more and more complex and difficult to understand especially for SMEs. It is important that ESOs stay aware of standardisation users’ needs, especially those users from industry.
- We note in point 18 that the European standardisation system needs improvements in efficiency, time-to-delivery and market relevance of standards developed. Orgalime believes that such initiatives should originate and be sought mainly from the stakeholders, i.e. industry and the national standardisation bodies. The ever-ongoing discussions in our industry on productivity and cost-efficiency should also be reflected in the ESOs and their strategies. Finding a right balance between calls for increased Community funding and requests for better market relevance is delicate.
- Orgalime welcomes the Commission goals outlined in point 19 to assess the effectiveness of the current European *Keymark* system and would support the promotion of voluntary compliance to the *Keymark* or any other similar European marks with a view to minimise barriers to trade, provided that:
 - Compliance to *Keymark* just as for any other European mark by use of third party certification should remain a question of free choice for manufacturers of any specific sector, whether it includes demonstration of voluntary compliance to European standards or not;
 - Reform of the *Keymark* or any other private mark should remain up to its stakeholders – and first of all manufacturers –, without pressure being exerted by the Commission or Member States;
 - We believe that there is no need for an alternative marking for showing that a manufacturer applies European standards besides the CE marking: in any case, the use of Harmonised Standards by a manufacturer should be left as an alternative choice to the demonstration of direct compliance to the essential requirements of a New Approach directive.

N.B.: Orgalime is preparing a position paper which will address in greater detail the relationship between the CE marking, private marks and voluntary third party certification.

III European standardisation and the challenge of globalisation

- Orgalime welcomes the Commission's objective of promoting the legislative approach of the EU throughout the world and the use of international standards worldwide. This is also in line with the desire by many companies to give first priority to international (i. e. global) standards and also support their uniform transposition in the EU.
- In point 25 we question the need to support the European stakeholders in order to participate in international standardisation. Such support may disturb (the financial) balance of the system and would probably be widely misunderstood in non-European countries.

Conclusion

Orgalime welcomes the Commission working document and appreciates being given the opportunity to comment at this stage of its preparation. We hope to be able to continue contributing to the finalisation of this ambitious document aiming at improving the European standardisation system, an essential tool for our companies that should remain voluntary in order to be attractive.