



ORGALIME position paper

answering to the on-line Internet consultation of stakeholders on

Integration of Environmental aspects into standardisation

19 September 2003

ORGALIME is the liaison group representing the interests of the European mechanical, electrical, electronic and metalworking industries at the level of the EU. ORGALIME's members include, at the present time, 32 national trade federations representing some 130,000 companies in 21 European countries. These industries, which include mainly small and medium sized companies, employ some 7.3 million people and account for around 1,200 billion Euro in the GNP and one third of the industrial exports of the EU.

As already stated in our position paper of 11 September 2002, ORGALIME welcomes DG environment and DG Enterprise's joint consideration on how to make better use of standardisation as a tool to protect the environment and support sustainable development. Our industries are committed and already involved for years towards reducing the environment impact at the design, manufacturing, packaging and end-of-life stages of our products.

Further to our oral comments at the stakeholder meeting of 16 July 2003, in the present position paper we are pleased to provide answers to the questions raised by the Commission in its Consultation Document¹ on the integration of the environmental impact into standardisation of 25 June 2003.

III - Aim and Scope

1. Do you agree with the aim and scope?

YES, ORGALIME recognises the importance of integrating environmental considerations in the standardisation work in particular for the design of products.

HOWEVER, we have concerns about some of the means and believe that it should take into account that **standardisation is a market-driven process, which should remain voluntary, open and attractive for all stakeholders**, including NGOs and SMEs. In particular, 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".

¹ Cf. On-line consultation of stakeholders on [DG ENTR](#) and [DG ENV](#)'s Web sites.

2. Have we identified all the key issues?

YES, ORGALIME believes that to date, all key issues to achieving a continuous improvement in the environmental impact of products placed on the market have been identified.

3. Should another policy option (e.g. legislation, guidelines) have been chosen by the Commission? If so, which one and why?

NO, ORGALIME believes that a Communication to the Member states and to the standardisation organisations is the most appropriate instrument in this area. For legislative purposes existing harmonised standards need merely 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. Standardisation per se should remain voluntary by nature; therefore Legislation is not appropriate in this area, nor imposed guidelines.

4. How frequently should the progress be assessed regarding the integration of environmental aspects into standardisation (e.g. every 2, 5 or 10 years)?

ORGALIME believes that progress regarding the integration of environmental aspects into standardisation should be assessed every **5 years**.

Engineering industries, which ORGALIME represents, already make significant efforts both at a national and sector level to improve the environmental performance of their products, by incorporating environment conscious design criteria into product development and by integrating environmental protection in the manufacturing process. However, it takes time and our industry's resources for writing new standards and amending existing standards are not unlimited; any reviews of standards for environmental purposes should happen alongside review for other purposes, and should not be an additional and separate exercise.

For manufacturers, too frequent and too many changes in product standards could lead to confusion and delays in transposing the new standard requirements into their design process, which requires 2 to 5 years to change, according to the degree of complexity of the final product.

V.1 - Environmental Thinking

5. Do you feel that you or your organisation contributes to the promotion of environmental thinking in standardisation? If the answer is yes, please describe the nature of your contribution.

YES, we our member associations and their members contribute actively to promote environmental thinking into our standards through their involvement in the standardisation work in both CEN/ISO and CENELEC/IEC. More specifically, we can mention the spearhead activities within IEC by ACEA, within CENELEC by CLC BTWG 85-3, and within CEN by CEN SABE. ORGALIME supports the ongoing consensus building process towards developing guidelines and standards on environment conscious design. The concrete description of environment conscious design must be done in the Technical Committee responsible for the product standards in order to raise the awareness of standardisation experts.

ORGALIME member associations have already taken up the challenge of educating and training SMEs in Environment conscious design (ECD): 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, where 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.

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

6. What are your expectations with regard to possible positive and negative impacts of implementing the ideas presented in the text (pt. 1.1-1.4)?

The positive aspect is that "greening" continues to be part of the overall voluntary consensus process, which is standardisation.

A possible negative impact is that the primary purpose of standards for industry, as tools to facilitate trade, the reason the industry invests so heavily in standardisation, may be pushed into second place, which could lead to reduced resource from industry going into that formal process. Therefore, it is essential that this process remains open and attractive for all stakeholders and 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.

- 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).
- Environmental regulations at national and EU level have already created a dense labyrinth of requirements. Companies who have voluntarily adopted, as "best management practice", an environment management system (EMS) with the aim of improving their overall environmental performance, should enjoy greater benefits in respect of legislative requirements, either if registered under EMAS, certified on the basis of ISO 14001, or even if they are self-declared (e.g. on the basis of EN 45014.). New legislative requirements could also be met, for example environment conscious design criteria could be part of an EMS, in accordance with ISO (TR) 14062, or equivalent guidelines

V.2 - Using Existing Tools and Standards for the Environment and Creating New Ones

7, 8, 9. Do you feel that there are sufficient tools to deal with environmental aspects in standardisation? If not, what new kinds of tools could improve the situation? Do you have examples/experience of these tools being used?

YES, there are sufficient tools already in place and under development in the standardisation organisations. They are increasingly used. For instance, the recently revised IEC Guide 109 on "*Environmental aspects – Inclusion in electro-technical product standards*" was first published in 1995 and has been successfully introduced. Another example is the ISO/TR 14062 "*Environmental management — Integrating environmental aspects into product design and development*", ratified in 2002.

Increasing awareness of those tools already existing (and under development) would better reward the effort than developing further tools, at this time.

10. Does the above text correctly describe the existing tools? Have we forgotten some instruments used which are already being used in standardisation?

There are more documents available from the standardisation organisations than those listed in the Commission document, for example IEC Guide 113, ISO TR 14062.

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.

11. Are the categories of existing standards for the environment correct and are the examples given useful?

YES, ORGALIME is of the opinion that existing "standards for the environment" are correctly described and the example given is useful.

However, the environmental benefit from the management systems standards derives from their application, rather than the third party certification undergone.

12. Please give any other examples of types of standards that, when applied, have a particular positive or negative impact on the environment?

Integrating the environmental aspects into standardisation is not limited to the use of "green" standards, as described under point 11 of the Commission working document. Many "product standards" developed already take into consideration environment conscious design requirements.

Integrating environmental aspects into standardisation should be done with due attention to other important aspects such as safety of human beings, animals and goods. For example, many CEN and CENELEC standards incorporate a requirement on fire performance (e.g. resistance to fire), the consequence of it is the use of substances such as "flame retardants" when designing products. On the one hand, the use of such substances may have a negative impact on the environment because in case of fire (or incineration) of the product, they release dioxins and other fumes in the atmosphere. They may make the waste less easy to recycle. On the other hand, the ban of flame retardants in some appliances for environmental purposes, has contributed to many fires in some countries. These fires have been by themselves detrimental to the environment (air pollution, etc..) and have been a great source of health and safety risks for the fire victims. Therefore, if there are no available technical solutions to date or if they are mutually exclusive, product safety should, we believe, have priority over environment protection.

V.3 - Setting Priorities

13. Should the Commission set priorities (at all)?

NO, insofar as legislation has not defined a finished set of objectives and set specific requirements accordingly (for example the banning of the use of lead in electrical and electronic products), ORGALIME strongly believes that the Commission should not set priorities. These should continue to be set within the voluntary consensus process, to which all interested stakeholders have access. Therefore, ORGALIME recommends leaving it up to stakeholders to decide how to integrate environmental aspects into standardisation, under their own responsibility and using whatever expertise may be available to them.

We would welcome more participation of the Commission in the process but as one of many stakeholders.

14. Can you think of any positive or negative consequences of setting priorities?

This depends on whose priorities they are; priorities imposed onto the process from outside will inevitably damage it. We do not see programming mandates in this light, while the standardisation organisation continue to be free to decline or to accept them.

It is key for the future of standardisation that it remains attractive to experts from companies, who have the technical knowledge on how best integrate environmental aspects into product design at an affordable cost.

While integrating environmental aspects into the design of products could be an incentive for the future marketing of the product, purely politically motivated priorities, which do not take into account the specificities of products and of companies which manufacture them, bare the risk to be disregarded by Technical Committees.

For example, 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.

15. Do you have suggestions as to how priorities could be set?

Environmental priorities must take their place for consideration alongside all the other priorities such as safety (long held to be number one priority), and between which a balance has to be struck. Besides, 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.

16. Do you think that the Commission should use mandates in order to prioritise issues? If so, why and in which particular areas?

ORGALIME believes that mandated standards have contributed to the success of the New Approach, and as a consequence their contribution to the success of the single market will be undermined if mandates are used to transfer difficult political decision-making into the standardisation bodies.

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.

V.4 - Stakeholder Participation

17. Should the emphasis on the efforts to improve the integration of environmental aspects be placed at the European or national level?

ORGALIME welcomes the participation of all stakeholders in the standardisation process: this includes consumers, workers, enterprises of all sizes 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.

Besides, in the engineering field, and especially in the electro-technical sector (where 70% of CENELEC standards are transposed from IEC standards under the Dresden Agreement), markets are predominantly international, needing international standards. The precedence of international standards requires initiatives at the level of IEC and ISO, whose members are the National standardisation Committees. European measures can only be of accompanying or supportive nature.

18. Do you have practical suggestions for ensuring the effective participation of groups of stakeholders that have important input but that are difficult to reach?

ORGALIME questions that stakeholders "that have important input" are not "in reach" of access to their National Committees, and the standardisation process.²

It is frequently said that "consumers" and "the greens" cannot afford to participate. In fact, in many countries, Consumer Organisations run as significant and successful businesses in their own right, as too do Environmental Organisations, and could well afford participation if they were interested. However, this is not their primary "product" as it is industry's, and they are not willing to commit to that level of resource.

In line with our comments on setting priorities, ORGALIME does not support the creation of "environmental champions", which may lead to the certification of experts with environmental knowledge, in order to enable them to participate in the standardisation process. It is the task of the National standardisation Committees to ensure an adequate representation of stakeholders.

19. How will more involvement of different stakeholders affect/change the standardisation process?

That depends on the intention and the competence of such an involvement. Stakeholders who seek to contribute to standardisation should meet all the requirements of National standardisation Committees, be transparent and accountable, and in a position to contribute pro-actively to the standardisation work within the mandate of their defined constituency.

ORGALIME, which constituency does represent a vast majority of SMEs, believes that 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).

V.5 - International Framework

20. What implications does the international framework have for European policies in your view?

As explained under n°17 above, the precedence of international standards requires initiatives at the level of IEC and ISO. Environmental standardisation requirements peculiar to the European regulatory environment could easily become trade barriers in the light of the WTO TBT Agreement and competitive handicaps for European companies on global markets.

² See the [series of national reports](#) collected by DG XXIV (Consumer affairs) on "Consumer Policy of the Member States of the European Union" - Doc. XXIV (1997) 1.0" updated in 1998-1999, which specifically mentions access of NGOs to standardisation in Austria, Belgium, Denmark, Finland, France, Luxembourg, Greece, and Spain. Since then, we tend to believe that the situation could only have improved.

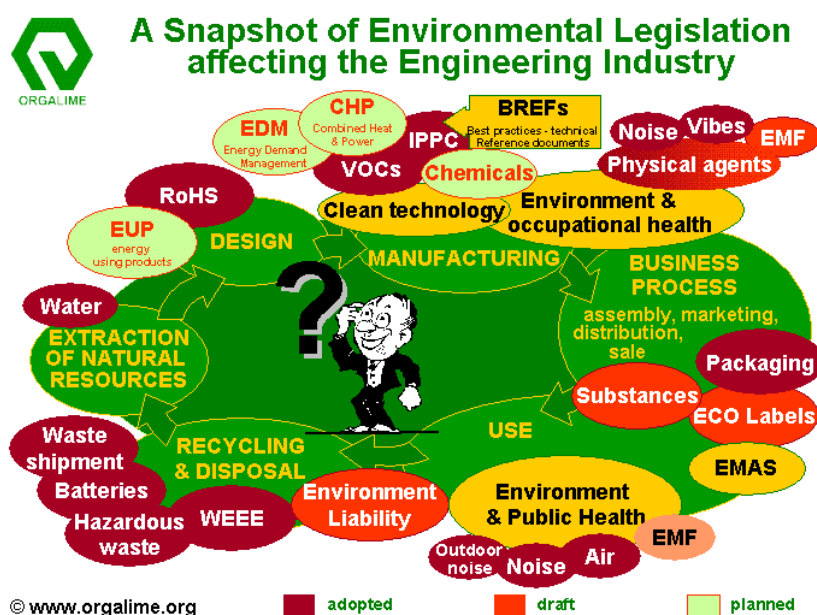
If the European welfare-state approach may sometimes take the lead in the international framework of standardisation, it could not hold it up with solutions specific to the legislation and functioning of the European Union (See our position papers on International standardisation).

VI - Possible Incentives

21. As with other policy areas, it might be possible to use European standards to show compliance with Environmental legislation. If this was the case, would it encourage standardisers to develop standards with a strong environmental dimension?

YES of course the possibility to use European standards to show compliance with Environmental legislation would encourage standardisers to develop standards for environment purposes, but that should not be a rationale for introducing new legislation, such a course would damage EU industry's competitiveness and the environment be the loser in the long term.

- We strongly support the continued application of the New Approach in the area of the technical directives, which we believe has contributed to a large extent to the undoubted success of the Internal Market. Therefore, we are interested in further discussing how far New Approach principles can effectively be applied to other areas, such as the environment, where over-rigid regulation, often applied differently from one member state to another, can lead to the fragmentation of the Internal Market and stifle innovation.
- Besides, while it is clear that EU product related legislation affects all competitors equally, EU environmental legislation affecting manufacturing processes and conditions, inevitably only can affect EU manufacturers: 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.
- We have for a number of years been requesting the Commission to adopt a more global approach to dealing with environmental matters, rather than an issue by issue approach, which inevitably interferes with the technological processes, innovation capacity and competitiveness of companies. However, we are becoming increasingly concerned by the number of what we see as incoherent initiatives coming from different Directorates General in the environmental field.



22. Are you familiar with the information made available under the eco-labelling schemes? If so, is it of use for the production of European standards?

YES, ORGALIME Members are familiar with the procedures for the use of the European Eco-Label, which are well known. However, the Eco-Label is poorly used and of poor interest to the consumer. The same fact could be observed with products bearing national environmental labels, such as the “Blauer Engel” in Germany.

Therefore ORGALIME believes that it is of no use for the production of European standards.

23. Would you use standards or purchase standardised products, process and services that cover environmentally important performances?

This is already the case in our industry. Promoting the use of greener standards than others could not be decided “top-down”, because there are many other factors that a company will consider when choosing between two standards, which may outweigh the “greening” dimension, such as its fitness for purpose, consumer tastes, and its ability to give presumption of conformity to the essential health and safety requirements of New Approach directives.

24. Would awards provide an incentive to integrate environmental issues into standardisation?

NO, ORGALIME believes that they could be divisive. See our comment under point 23.

25. Would you consider using databases? How would you use them? Would the availability of databases ease the integration of environmental aspects into standardisation?

YES, ORGALIME’s constituency would use and support the creation of databases on the environmental aspects of elements used for the standardisation of products. For instance, the aim of the CENELEC's database development is to reference the nature and extent to which environmental aspects feature or are under consideration in CENELEC standardisation activities, and will further stimulate the process.

However, 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.

26-27. Can you think of other incentives than the ones presented here? Can the incentives result in benefits that outweigh the costs that individual stakeholders may incur?

ORGALIME believes that the promotion of wider acceptance of environment friendly products should target the market forces. For example, a planned approach to help trade associations to organise trainings and workshops on environment conscious design (ECD) would do more for the promotion of the use of “greener” standards than the European Ecolabel. Any incentive system which would not be based on the market needs and would not be organised with company federations, would be useless and doomed to failure.

VII - Conclusions

28. Will this Communication on the integration of environmental aspects into European standardisation help you or your organisation in your work?

ORGALIME understands that a *Communication* of the Commission is first and foremost a political commitment of the Commission itself to act in a specific manner under certain circumstances. As such, ORGALIME usually reacts when such a commitment would pave the way for a modified or new policy framework that would affect its constituency.

ORGALIME will certainly support such a commitment of the European Commission, if it advises pragmatic, non regulated, market-based solutions and will as certainly oppose any indicated attempts to limit the freedom of standard making.

29. What could be the positive and negative consequences of this Communication for your work?

A positive consequence is that it will allow our members, as trade associations, to draw the attention of companies to the policy considerations expressed by the Commission in this Communication.

A possible negative consequence is that the primary purpose of a standard (i.e. its primary use and value to industry, the major investor in the process) may be lost sight of, as standards become tools for other purposes.

30. Please give any positive and negative examples of the integration of environmental aspects into standardisation?

Positive: as already mentioned in points 6 and 7, the integration of environmental aspects into standards is considered as positive by many companies in our field, which already use the aforementioned IEC standardisation Guide 109 and ISO TR 14062. Standardisation organisations are already able to list existing standards which contain environmental aspects.

Negative: If European standards become "greener" and deviate from international standards, this will only serve to weaken those such as the European industries, who are resisting the watering down of international standards due to the so called "regional requirements".

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