



# International Standardisation

## Orgalime Position Paper

### Comments on the Commission discussion paper "Proposed elements for European guidelines on international standardisation" (SOGS N381R2)

28 May 2001

Orgalime represents 29 trade federations representing some 100 000 companies in the mechanical, electrical, electronic and metalworking industries in 20 European countries. These industries, which include many small and medium-sized companies, employ some 7.6 million people and account for 1200 billion euros in the GNP. Orgalime industries exported some 591 billion euros in 2000, which represents a third of total EU exports of manufactured products. In 2001, exports of engineering products are expected to rise by 20% for electro-technical goods and ICT products, 9% for machinery and 10% for metal products.

**Orgalime welcomes the Commission discussion paper on "Proposed elements for European guidelines on international standardisation". It is an excellent paper whose views are shared by the engineering industry.**

In addition, Orgalime would like to make the following statements:

1. **Orgalime fully supports recognition of "the national standardisation process"** (Clause 3) and "national participation" (beginning of clause 6, page 6). The existence of national mirror committees is the best way of achieving consensus. What is more, it ensures that all stakeholders, including 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.
2. **Given that working process, any conflicting national standards should be withdrawn when regional or international standards are available.** National deviations should be accepted only if justified through de facto different national conditions in essential areas, such as health, safety and environment. Therefore, Orgalime agrees with the principles mentioned in Clause 3 of the paper, but only if those are understood in the light of the principles of Clause 2.
3. **Adequate balance between transparency (fair consultation) and efficiency (time to market) should be supported** (clause 4). The emphasis on "early phase standards development" for fast moving technology is welcome. In practice, developing all standards at speed is not possible. One way to improve efficiency could be by using new deliverables rather than just "standards".

4. **Quality in standardisation is not mentioned as a principle** (Clause 4). Quality must not be overlooked in the pursuit of effectiveness and consensus. Quality should be ensured by the active participation of all stakeholders - each of their experts within their field - from the very beginning of the process, so that standards become generally accepted, fit-for-purpose, safer for users, etc..
5. **Orgalime welcomes the statement that standards offer a potential for deregulation** (Clause 5). However Orgalime stresses the importance of harmonisation of regulatory requirements and uniform application of standards, as a potential prerequisite for deregulation.

### **Conclusion**

Orgalime welcomes the Commission paper proposing the development of guidelines and thanks the Commission for consulting us. Our industry very much hopes to continue contributing actively to the pursuit of international standardisation, which is an essential tool for our companies.

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