

Brussels, 14/12/2015

Orgalime initial response to the Commission proposed “Joint Initiative on standardisation”

as outlined in its communication on “*Upgrading the Single Market: more opportunities for people and business*” (28/10/2015) ¹

1. EXECUTIVE SUMMARY

The engineering industry, as the chief contributor to standardisation work and main user of standards, want to help to reinforce the public-private partnership between the Commission and the standardisation community. We believe that the proposed “Joint Initiative *on standardisation*” should encompass all mandated standardisation work and build on the five cornerstones listed below:

- 1) **support the competitiveness of European industry**; mandated standards should always be market relevant and based on consensus.
- 2) **support innovation and growth**; the positions of the intended users of mandated standards should always be considered and the use of mandated standards should always be voluntary.
- 3) **foster inclusiveness**; industry should be consulted on standardisation policy issues.
- 4) **reduce red tape**; the principle of better regulation should guide the European Commission in the administration and follow-up of standardisation policy and mandates.
- 5) **facilitate global trade**; standardisation mandates should always take the global perspective of standardisation into account.

Following this general guidance, we believe that standardisation could contribute to at least two of the priorities for Europe of Commission President Juncker as follows.

2. “A DEEPER AND FAIRER INTERNAL MARKET WITH A STRENGTHENED INDUSTRIAL BASE”

The ‘New Approach’ to the harmonisation of Union legislation, which was made exemplary in a “New Legislative Framework” (NLF) in 2008 –, provides the possibility to use voluntary harmonised

¹ <http://ec.europa.eu/DocsRoom/documents/14007?locale=en>

Orgalime, the European Engineering Industries Association, speaks for 42 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.3 million people in the EU and in 2014 accounted for more than €1,800 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.

standards to show compliance with EU legislation. It has been a key factor in stimulating the competitiveness of the European engineering industry over the past 30 years.

Therefore, Orgalime would support reinvigorating and extending such a regulatory and compliance approach, provided that it remains an enabling regulatory framework, preserving and better reinforcing the competitiveness of our industry through the market-driven nature of European standardisation.

Orgalime would be ready to contribute and support a joint initiative on standardisation that acknowledges the fundamentally different roles of standards and legislation. With the NLF, legislation is the tool for setting essential regulatory requirements and objectives, thereby reducing the need for detailed legislative acts, which could rapidly be outdated and thereby hinder innovation. Standards are further enabled as a means to demonstrate compliance with regulatory requirements, while meeting market needs such as the interoperability of products and systems.

The principle of better regulation should guide the administration of the European Commission's standardisation policy.

Today the industry perspective is not adequately taken into consideration in the Commission's decision-making process on European standardisation policy planning and monitoring.

European Standardisation Organisations (ESOs) need to remain neutral to represent the views of all their stakeholders and Annex III organisations have the obligation to represent special interest groups in standardisation work. By reinforcing the cooperation with industry on standardisation policy initiatives, legislators will be able to improve their understanding of market needs – that are the drivers for participation in voluntary standardisation activities–, reduce bureaucracy, and support flexible, sector-specific solutions.

Orgalime recommendations:

- **European legislators** should consider standards as contributing to the competitiveness of European manufacturing through the enhancement of the internal market framework conditions.
- **European Legislators** should consider standards only as a means to simplify the application of specific legislation, never to fulfil general policy objectives.
- **The Commission** should apply a coherent approach for all standardisation policy issues to facilitate input from industry:
 - Documents should be made available online and be open for comments.
 - A platform for **direct dialogue with industry stakeholders** should be set up.
 - Industry should be granted an observer seat in the Committee on Standards.
- The **whole mandating** process, from issuing a standardisation request to the citation of the mandated standard in the Official Journal, should be streamlined and open for input from industry:
 - **The Commission** should consult the intended users of the related standards at the earliest possible stage, before issuing a formal standardisation request.
 - **The ESOs** should ensure that all interested stakeholders are aware of and can comment on draft standardisation requests.
 - **The European Member States**, following the recommendation of regulation 1025/2012, should encourage the participation of public authorities at an early stage in standardisation work. This would facilitate the consensus building process and minimise the need for formal objections, which should be backed up with robust data such as accident statistics relevant to the subject matter.
 - **The European Member States** and their public authorities should respect and make use of harmonised European standards and avoid setting additional or diverging national requirements.

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- **The Commission** should set up an early warning system to ensure that objections to mandated standards are underpinned by robust evidence/data, raised in a timely manner and prevent as much as possible such objections to be raised at the very last stage.
- **The Commission** should, without delay, cite mandated standards approved and offered by the ESOs in the Official Journal.

The Commission should initiate sector specific and flexible standardisation requests allowing an easy integration of additional work items at a later stage and preserve the benefits of the bottom-up concept that has been and should remain the key to the success of the New Approach.

3. “A STRONGER GLOBAL ACTOR”

A global perspective on standards and standardisation will help European industry to grow outside Europe. International standards facilitate market access and simplify export for our engineering industries. These positive effects are further enhanced if regulators reach multilateral agreements on common regulatory goals, and promote New-Approach-type legislation in a growing number of countries around the globe.

The longstanding relationship between the European standardisation organisations and their counterparts in the world is a strategic asset that can be used to promote free trade and strengthen the competitiveness of European industries. All standardisation requests proposed by the Commission should, as a starting point, take such a global perspective into consideration. A European-regional approach and the use of home-grown European standards should only be applied when it will be demanded from an overall regulatory perspective and it is evident that it will give a significant competitive advantage to the European industry.

Therefore Orgalime would support a joint initiative that would ensure that standardisation requests are always market relevant and never burdened with administrative requirements specific to Europe. Such a global-friendly approach would facilitate the development of identical EN-ISO and EN-IEC standards, and strengthen the global competitiveness of European industries.

Orgalime recommendations:

- **Signatories of the Joint Initiative on Standardisation** should promote ‘*New Approach*’ (NLF)-type legislation outside Europe.
- **European Legislators** should promote the concept of common regulatory objectives (as those developed by the UNECE) globally.
- **The Commission** should always evaluate the possibility to refer to EN-ISO or EN-IEC standards when mandates are issued.
- **The Commission** should facilitate the development of harmonised standards as EN-ISO or EN-IEC by minimising Europe-specific administrative requirements in their standardisation requests that may hinder global acceptance of these standards.

A joint initiative on mandated European standardisation that would be drafted along these lines would ensure that the EU’s standardisation policy does effectively aim at “creating opportunities for consumers and businesses” by mainstreaming industry competitiveness into a core policy area for Orgalime’s industry.

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