

**The European Commission ROADMAP FOR THE STANDARDISATION STRATEGY**

- A. Consumers' view on the document (the Roadmap) itself
- B. Consumers' view on the CEN and CENELEC Joint Response to the European Commission Standardization Strategy Roadmap

**Information prepared by the Cabinet for Standardization, for NV a ENV**

Libor Dupal, July 2021

**A. Consumers' view on the European Commission ROADMAP FOR THE STANDARDISATION STRATEGY**

European consumers developed their position to the EC document (the Roadmap) under ANEC. Libor Dupal, Director of Cabinet and Chair of the Board of the Czech Consumer Association is the Czech member of the ANEC General Assembly and a member of the ANEC Steering Committee) The consumers' view was not published yet officially; on this occasion the Cabinet inform about some crucial conclusions from the consumer point of view.

Consumers, sure, welcome the initiative of the European Commission (EC) to develop a Standardisation Strategy. For consumers, standards are important as, when they are properly developed and applied, they can make our lives easier; the products we buy safer, securer, more interoperable and accessible to people of all ages and abilities. They can also improve product performance and help reduce environmental impacts. Moreover, standards can aid the quality and safety of services.

Basically, we do not consider a revision of Regulation (EU) 1025/2012. Consumers believe better implementation of the Regulation – notably by Member States in tackling the inclusiveness of standardisation at the national level as the principal conduit to European standardisation would be more useful.

Our notes here follow most of the problem statements set out in the Roadmap.

**1. Anticipating standardisation needs**

Consumers are aware that some Directorates-General do not appear familiar with standardisation (the same it is ant national level); and they have looked to refer to specifications developed outside the ESS (e.g. by European trade associations) to support their needs. The processes used in the development of these specifications are often not transparent or address provisions of Regulation (EU) 1025/2012 in facilitating the participation of underrepresented stakeholders, such as consumers.

**2. Speed of standards development**

A lot have changed within last decades, but the need for added speed should be questioned, especially as each enforced reduction in time risks the chance to build the broad and robust consensus of all interested parties that should be fundamental to an EN. This risk applies especially to the representation of underrepresented stakeholders. After all, consumers are convinced that the rigour of the technical solution must take precedence over the speed of development.

Regarding the development of Harmonised Standards, it is evident that this added layer of control by the EC (and new system of HAS Consultants) has introduced significant delays in the citation of Harmonised Standards. This has caused much concern among some industry sectors as manufacturers cannot benefit from the presumption of conformity until the reference of the Harmonised Standard is cited.

**3. Inclusiveness**

On inclusiveness, Regulation (EU) 1025/2012 has codified and improved the rights of participation of the underrepresented stakeholders, especially through its provisions on facilitating participation of the European stakeholder organisations cited in Annex III to the Regulation. The Standardisation Strategy should

ensure that inclusiveness and effective participation of societal stakeholders is implemented beyond the mere obligation of efforts as defined in Articles 5 and 16 of the Regulation and also takes account of the actual results.

We see this of particular importance at national level, noting that the Regulation has (by its very nature) direct legal effect in EEA countries. Given this, there is a responsibility on Member States to put into place the political and financial frameworks needed to ensure participation of all interested stakeholders at the national level, so the views of national delegations in CEN-CENELEC (and ISO/IEC) represent a genuine consensus of the national view.

#### 4. International vs European standardisation

(no comment on this occasion)

#### 5. Education and training

Consumers are more interested in whether a product or service is (for example) safe or sustainable, than whether it complies with a standard. Indeed, although some consumers may be familiar with standards, very few know the process.

Nevertheless, we do think it essential to promote education and training on standards, and the value of standards, as part of tertiary and (perhaps) secondary education. Moreover, we believe the EU Institutions and the ESOs, aided by stakeholder organisations should use the opportunities provided by on line media to demonstrate the value of standards to people's lives, through coordinated campaigns ...

#### 6. Services

Nevertheless, we believe the EC needs to be more active in encouraging Member States to take steps to reinforce the Single Market for Services. For consumers, the focus of the EC on B2B services is insufficient. We know the argument that service provision is often local, with little cross-border activity, but this ignores that consumers consume cross-border (e.g., leisure & sports services, health & well-being services, cross-border online services, tourism services & accommodation and financial services).

We have long-called for introduction of an EU legal framework for the safety & liability of services to harmonise what is now a fragmented legal landscape across Member States. Without such a framework, the potential of European Standards to support services to the benefit of the economy and society will be far from optimised, as an EN cannot take precedence over national regulation.

### B. Consumers' view on the CEN and CENELEC Joint Response to the European Commission Standardization Strategy Roadmap

Kabinet for standardization, a public service company with a statutory mandate focused on influencing standardization processes in matters of prime importance for Czech consumers. Kabinet welcomed the EC initiative summarized in the document ROADMAP FOR THE STANDARDISATION STRATEGY, and the more it has welcomed the document developed as a CEN AND CENELEC JOINT RESPONSE.

Kabinet on behalf of consumers can really support the recommendations as prepared in its entirety by the ESO. They are quite complex and well explained.

Some recommendations deserve, however, greater emphasis that they also relate to consumers. Particularly it relates to R. No 14 (Uptake of standardization at business education level and the Vocational Education programme) where consumers might be literally also mentioned.

As to Chapter of Services we believe that R. 15 (Increase awareness about service standardization and define priorities together with Member States, regulators and stakeholders) is not enough to cover the issue. Consumers have long-called for introduction of an EU legal framework for the safety & liability of services to harmonise what is now a fragmented legal landscape across Member States. Without such a framework, the

potential of European Standards to support services to the benefit of the economy and society will be far from optimised, as an EN cannot take precedence over national regulation

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