



OPINION

European Economic and Social Committee

Standardisation strategy / Standardisation Regulation

a) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions
An EU Strategy on Standardisation Setting global standards in support of a resilient, green and digital EU single market
[COM(2022) 31 final]

b) Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1025/2012 as regards the decisions of European standardisation organisations concerning European standards and European standardisation deliverables
[COM(2022) 32 final – 2022/0021(COD)]

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Referral

- a) European Commission, 02/05/2022
- b) European Parliament, 14/02/2022
- c) Council, 17/02/2022

Legal basis

- a) Article 304 of the Treaty on the Functioning of the European Union
- b) Article 114 of the Treaty on the Functioning of the European Union

Section responsible

Single Market, Production and Consumption

Adopted in section

05/05/2022

Adopted at plenary

18/05/2022

Plenary session No

569

Outcome of vote

(for/against/abstentions)

186/1/3

1. Conclusions and recommendations

- 1.1 The EESC welcomes the European Commission's Communication on the future of EU standardisation in the global context. The European Commission's proposal rightly reflects the development of international standards and responds to changes that have taken place. Regarding the proposal in Article 10 of Regulation (EU) No 1025/2012, the EESC welcomes a review of governance. The governance of European standardisation organisations (ESOs) needs to take into account the transparent, open, inclusive and fair participation of all relevant market players, consumers, social and environmental stakeholders, trade unions, SMEs and large companies.
- 1.2 To ensure a broad societal consensus, it is essential to guarantee an inclusive, balanced approach that fully enables all interested and affected stakeholders to participate. At EU and Member State level, politics and standardisation organisations support each other by shaping framework conditions. The requirement for the European Standardisation Strategy to be inclusive is unique in the world and well worth reinforcing. At international level, the absence of inclusiveness as a cornerstone of international standardisation is a cause for concern.
- 1.3 The EESC sees the danger that, in other regions in the world, standardisation has become an "industrial policy" tool or geopolitical instrument. The European Union needs to be ready to adapt its approach in order to secure and increase the competitiveness of European companies and the protection of consumers. The EESC therefore welcomes the 22 proposed measures, including setting up a high-level forum to better coordinate stakeholder interests, creating the post of the "chief standardisation officer", calling for governance reform in ESOs, setting standardisation priorities for the twin green and digital transformations, and speeding up standardisation processes.
- 1.4 It is necessary to bring together the "bottom-up approach" of market-driven standards and the political-strategic "top-down approach" through closer cooperation between governments/politics, industry and other stakeholders in order to develop common European strategies and uphold democratic values. To this end, a continuous exchange between the European Commission, ESOs, national standardisation bodies, industry and civil society stakeholders must be established.
- 1.5 The EESC also supports calling on ESOs to modernise their governance in order to fully represent the European public interest and democratic values, as well as the interests of SMEs, environmental and social stakeholders, trade unions, and civil society and users, and to facilitate access to standards.
- 1.6 The European standardisation strategy mentions several training and educational initiatives aimed at researchers, young professionals and practitioners, which seek to promote the development of skills in the standardisation field. The EESC believes these proposals to be of key importance, especially for SMEs and micro enterprises and in order to set a framework for investing in talent, and strongly supports their broad and swift introduction. It underlines the need for increased funding from European and national authorities to all those involved in

standardisation, such as trade unions, civil society organisations and companies, to improve their abilities to participate in standardisation work.

2. Context of the Commission proposals

- 2.1 Standards are at the core of the EU single market. Over the last 30 years, the European standardisation system has delivered more than 3600 harmonised standards allowing companies to demonstrate compliance with EU law. European standards have delivered great benefits, creating a level playing-field in the single market for businesses and increasing consumer confidence. The contents are defined in the technical committees, where the state has a right to participate, but has no further-reaching rights of intervention. In some EU Member States, there are additional regulations for processing projects of public interest. Because harmonised standards are part of EU law [cfr Commission Communication (2018)764], they must be written according to the democratic principles, with involvement of all stakeholders (including civil society, consumer, social, environmental and trade union interests and SMEs) and as such ensuring a balanced decision making process inside the national, European (and international) standardisation organisations.
- 2.2 European standardisation operates within an increasingly competitive global context. Europe's competitiveness, technological sovereignty, ability to reduce dependencies and protection of EU values – including our social and environmental ambitions – will depend on how successful European actors are in standardisation at international level. This requires resources/expertise from the European stakeholders, without which it is not possible to uphold European lead in the international standardisation.
- 2.3 The EU's ambitions towards a climate-neutral, resilient and circular economy cannot be delivered without European standards. In order to remain a global standard setter, the EU must have a strong global footprint in standardisation activities, and lead work in key international forums and institutions.
- 2.4 In its standardisation strategy¹, the Commission outlines its approach to standards both within the Single Market and globally. The strategy is accompanied by a proposal for an amendment to the Regulation on standardisation², a report on its implementation³, and the 2022 annual Union work programme for European standardisation⁴. The strategy aims to strengthen the EU's global competitiveness to enable a resilient, green and digital economy, and to enshrine democratic values in the application of technology.
- 2.5 In new and emerging technologies, the European standardisation system often fails to deliver in a timely manner, and thus loses the important "first mover" advantage through standardisation. This strategy proposes a set of actions to put standards back at the core of a resilient, green and

1 [COM\(2022\) 31](#).

2 [COM\(2022\) 32](#).

3 [COM\(2022\) 30](#).

4 [C\(2022\) 546 - Work programme](#).

digital EU single market, and to strengthen the global role of the European standardisation system. At EU and national Member State level, politics and standardisation organisations support each other by shaping these framework conditions. This cooperation has proven successful and has been the basis for economic success and international market access for European companies.

- 2.6 The Commission is also proposing an amendment⁵ to Regulation (EU) No 1025/2012 on standardisation⁶ to improve governance in the European standardisation system. While the European system will remain open, transparent, inclusive and impartial, the proposal prescribes that standardisation requests of the Commission to the European standardisation organisations must be handled by the national standardisation bodies.
- 2.7 In line with Regulation (EU) No 1025/2012, the Commission has published a communication setting out the annual European Union work programme for European standardisation for 2022, which outlines the actions that the Commission intends to initiate over the course of 2022 to enhance the openness, transparency and inclusiveness of the European standardisation system (ESS).
- 2.8 Under Article 24(3) of Regulation (EU) No 1025/2012, the Commission shall report on its implementation every five years. The Commission presented a second report⁷, mainly covering 2016-2020, with some updated facts and figures through to 2021. It shows that the European standardisation system improved in some aspects – e.g. with regard to new IT tools – but that there is still room for improvement in other areas. This applies in particular to inclusiveness, the role of NSBs in the ESS, and the delivery time of HENs to the Commission.

3. **General comments**

- 3.1 The EESC welcomes the European Commission's Communication on the future of EU standardisation in the global context. The European Commission's proposal rightly reflects the development of international standards and responds to changes that have taken place. It aims to ensure a strong European voice and secure European interests in standard-setting procedures and structures. If Europe uses the momentum of the twin transition properly, it can become a "first mover" in the areas of green and digital standardisation.
- 3.2 Regarding the proposal in Article 10 of Regulation (EU) No 1025/2012, the EESC welcomes a review of governance. The governance of ESOs needs to take into account the transparent, open, inclusive and fair participation of all relevant European market players, consumers, social and environmental stakeholders, trade unions, SMEs and large companies. It has to reflect the legitimate scope of standardisation, avoiding undermining democratically legitimised legislation processes and excessive demands for standardisation.

5 [COM\(2022\) 32](#).

6 [OJ L 316, 14.11.2012, p. 12](#).

7 [COM\(2022\) 30](#).

- 3.3 Traditionally, standards have been developed by industry. To ensure a broad societal consensus it is essential to guarantee a balanced approach that fully enables all interested and affected stakeholders to participate. At EU and Member State level, politics and standardisation organisations support each other by shaping framework conditions. The requirement for the European Standardisation Strategy to be inclusive is unique in the world and well worth reinforcing. At international level, the absence of inclusiveness as a cornerstone of international standardisation is a cause for concern.
- 3.4 The EESC would like to point out the benefits of the New Legislative Framework (NLF) of the European Commission for using harmonised standards to concretise regulatory requirements. The EESC wishes to highlight that standards are not meant to shift regulatory power to private sectors. Socio-political considerations that fall within the remit of the social partners and/or the regulator should not be dealt with by ESOs and international standardisation bodies. The EESC stresses that the standardisation of services in particular requires careful consideration of democratic legitimisation. The content and complexity of services is extremely diverse, ranging e.g. from postal services to complex intellectual services, and cross-cutting standards cannot adequately take that into account.
- 3.5 The EESC sees the danger that, in other regions in the world, standardisation has become an "industrial policy" tool or geopolitical instrument. The European Union needs to be ready to adapt its approach in order to secure and increase the competitiveness of European companies and the protection of consumers. The EESC therefore welcomes the 22 proposed measures, including setting up a high-level forum to better coordinate stakeholder interests, creating the post of "chief standardisation officer", calling for governance reform in ESOs, defining standardisation priorities for the twin green and digital transformations, and speeding up standardisation processes. The European and international standardisation system should be strengthened by these measures.

4. **Specific comments**

- 4.1 Standards create markets. The EESC believes that the European Single Market and granting third party access to this market is also a strategic asset. In order to secure the interoperability of products and services worldwide and across different economic and societal systems, we need to maintain the fundamental "one standard – one test – accepted everywhere" principle. It must be ensured that standardisation processes that are driven by economic or third party political interests do not override democratically enacted legislation.
- 4.2 The EESC believes that international standards, especially when transposed into European standards, must take into account European social values by ensuring that the international standardisation system is truly inclusive. In this context, the EESC calls for a more robust application of the Vienna⁸ and Frankfurt⁹ agreements concluded by the standardisation bodies, which aim to avoid European standards competing or even conflicting with international ones.

⁸ [https://isotc.iso.org/livelink/livelink/fetch/2000/2122/3146825/4229629/4230450/4230458/01_Agreement_on_Technical_Cooperation_between_ISO_and_CEN_\(Vienna_Agreement\).pdf?nodeid=4230688&vernum=-2](https://isotc.iso.org/livelink/livelink/fetch/2000/2122/3146825/4229629/4230450/4230458/01_Agreement_on_Technical_Cooperation_between_ISO_and_CEN_(Vienna_Agreement).pdf?nodeid=4230688&vernum=-2).

⁹ http://www.iec.ch/about/globalreach/partners/pdf/IEC-CENELEC_Frankfurt_Agreement%7B2016%7D.pdf.

- 4.3 Implementing existing commitments on standardisation in EU trade agreements, and cooperation on standardisation with like-minded partners in strategic areas and in international standardisation organisations are crucial success factors. The EESC believes that dialogue with the US should be strengthened via TTC – Trade and Technology Council cooperation, and that digital partnerships with Japan, Singapore and South Korea and other like-minded countries can be beneficial.
- 4.4 It is necessary to bring together the "bottom-up approach" of market-driven standards and the political-strategic "top-down approach" through closer cooperation between governments/politics, industry and other stakeholders in order to develop common European strategies. To this end, a continuous exchange between the European Commission, ESOs, national standardisation bodies and industry must be established.
- 4.5 The EESC also supports calling on ESOs and their member organisations to modernise their governance in order to fully represent the public interest and the interests of SMEs, environmental and social stakeholders, trade unions, and civil society and users, and to facilitate access to standards. However, it must be ensured that this review does not paralyse the ongoing standardisation work or lead to delays of products being placed on the market. The issue of standards made available for free needs to be discussed with all participating market players.
- 4.6 The EESC wishes to point out that standards do not only regulate the technical aspect of a product, but can have an impact on people. Thus the EESC calls on the European Commission to better specify how EU Member States shall be held accountable for ensuring that civil society associations are able to actively participate in standardisation activities. The EESC calls on the European Commission to provide further financial support measures to help SMEs and societal stakeholders (such as consumer organisations) with fewer resources participate in standardisation processes in order to ensure balanced representation. They provide a broad variety of independent expertise and experience relevant for standardisation processes. The EESC also draws attention to the fact that, despite their voluntary nature, the non-application of standards can have severe negative effects, including creating liability and compliance problems.
- 4.7 The EESC believes it important that all stakeholders, ESOs and other partners work together to immediately address the standardisation urgencies that have been identified, such as COVID-19 vaccine and medicine production, critical raw materials recycling, the clean hydrogen value chain, low carbon cement, chips certification and data standards. The EESC therefore calls on the Commission to hold talks with EU Member States and stakeholders before defining standardisation priorities so that important standards are not overlooked. This would ensure that ongoing standardisation work is not interrupted by new goals.
- 4.8 The EESC fully supports accelerating standard-setting procedures, and proposes incorporating a legal check of standards at technical committee level and close cooperation with the harmonised standards (HAS) consultants at this stage of the process.

- 4.9 The EESC warns that the proposed review of existing standards in the light of the objectives of the European Green Deal and the twin transitions must not lead to a massive rework of standards, which would delay the development of much needed new standards. Such a review will take up resources, which should come not only from large industry, but also from national authorities, research institutes, and environmental and social stakeholders, including trade unions.
- 4.10 In this context, the EESC highlights the possibility of applying "equivalent alternative solutions". This concept is extremely important, especially as regards innovation, and needs to be strengthened, enforced and better communicated in order to avoid hindering innovation because of potential liability claims. The EESC wishes to underline though that these solutions should not be used in the area of health and safety. "Equivalent alternative solutions" should also be considered in public procurement as a tool for the uptake of standards.
- 4.11 The EESC supports the proposal to set up a high-level forum to assist the Commission in anticipating upcoming standardisation priorities and engage with the European Parliament and Council to ensure political concertation on these priorities. However, it is crucial to provide for industry and relevant stakeholder participation in this high-level forum, and for consistency with the work of the EU Industrial Forum and the Industrial Alliances. However, the EESC calls on the Commission to clarify the relation of the proposed Excellence Hub on Standards with the other forums.
- 4.12 The strategy mentions several training and educational initiatives aimed at researchers, young professionals and practitioners, which seek to promote the development of skills in the field of standardisation. These include a "standardisation booster", "standardisation university days", the dissemination of relevant material by the EU Academy, and the funding of standardisation projects abroad. The EESC believes these proposals to be of key importance, especially for SMEs and micro enterprises and in order to set a framework for investing in talent, and strongly supports their broad and swift introduction.
- 4.13 In particular, the EESC encourages international cooperation on EU standards using EU programmes and funds (such as the Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI-GE) and Horizon Europe), and supporting stakeholder participation in international standardisation abroad (SMEs, civil society, academics), e.g. in Africa as a positive initiative to counter-balance other regions' engagements on the African continent. Standardisation strengthening should become one key element of the EU's Global Gateway Initiative.

Brussels, 18 May 2022.

Christa Schweng

The president of the European Economic and Social Committee