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Joint contribution by Annex III organisations to
the “Guidance Note on European Standardisation 2015”

BACKGROUND

During the 1st Joint Coordination meeting on 8th July 2014, it was agreed that the European Commission would launch a “Written Procedure” on the Guidance Note on European Standardisation 2015”. This procedure would ask for a **Joint contribution by the 4 Annex III organisations**. . This document is presented to European Commission as a contribution to re-drafting the relevant paragraphs of page 3 of the Guidance Note.

1) Balanced and effective participation

a. Specific Status of Annex III organisations

The Annex III stakeholders’ organisations should be allocated a specific membership or partnership category while working with ESOs, given the role that the Regulation has attributed to them. Whatever the name or label of this specific status, it is necessary to establish a clear and substantial distinction in rights between Annex III organisations and other pan-European Organisations in the standard making system.

Furthermore, the positive example of SMEs having a specific membership category and place in the governing bodies of ETSI should be extended to the societal stakeholders and replicated for the four Annex III organisations in CEN-CENELEC, whereas ETSI should also be invited to introduce a pan-European category within its membership for the Annex III organisations.

b. Unlimited right of appeal

Because of their specific status and the impossibility to follow all standardisation activities that may have an impact on their constituents and on the societal interests that they represent, Annex III organisations need to be granted an unlimited right of appeal. This is evidently connected to point 1 a) and we ask CEN-CENELEC to recognise that Annex III stakeholders must be granted a derogation to the recent decision of their Technical Boards, limiting the right of appeal only to standardisation activities in which the appealing party has contributed. Such a derogation would also accord with the Partnership Agreements signed by each of the Annex III

organisations with CEN-CENELEC prior to the decision of the Technical Boards and ensure the implementation of Regulation 1025/2012 as far as effective participation is concerned.

c. Access to draft standards

Although welcoming the present efforts of CEN-CENELEC to ensure the access of Annex III organisations to draft standards and related working documents across all technical bodies and sometimes different e-platforms, such access needs to be guaranteed if the organisations are to fulfil the role foreseen for them in the Regulation.

2) Raising awareness on the role and rights of the Annex III organisations

The facilitation of the participation of societal stakeholders can only take place only if the National Standardisation Bodies and the members of the European Technical Bodies are knowledgeable about of the role and rights of Annex III organisations. Awareness raising activities should therefore be undertaken by the ESOs, combined with monitoring activities to evaluate their impacts at the technical level. These activities should also be carried out towards the international level (ISO and IEC) as many European standards originate from are developed there.

Separately, the Commission needs to check, both directly and through the ESOs, that the national standards bodies and national (electrotechnical) committees are facilitating the participation of SMEs and societal stakeholders at the national level in line with the requirements of the Regulation.

3) Alignment of working methods and governing rules of the three ESOs.

The enormous difference in the working methods and governance criteria between CEN-CENELEC and ETSI has pros and cons. A more coherent set of rules for the three ESOs should be found, especially with regards to the Joint CEN-CENELEC-ETSI Coordination Groups, and the rights and obligations of the Annex III organisations as noted under point 1 a).

4) Higher level of democracy and transparency in the membership/management/functioning of Technical Committees, Working Groups and Sector Fora avoiding domination of certain interests

The Technical Committees and Working Groups develop a great amount of technical work, which impacts directly on the drafting of standards, with Chairs enjoying an important power. For that reason, it is important to prevent the presence of dominant interests.

Hence, the Annex III organisations propose that more attention and closer scrutiny be paid to the membership of the TCs, the selection criteria and nomination processes of Chairs and Convenors, and that existing rules on the duration of mandates durations be enforced by the ESOs in order to ensure that the formation of the consensus is achieved impartially.

The same attention should be given to chairs of sector fora, which are the platforms aiming at facilitating the exchange of information between the different stakeholders, as well as coordinating and identifying the standardisation needs in a specific field of CEN work.

Brussels, 28th July 2014



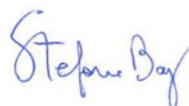
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