



SBS proposed amendments to IMCO Draft Report on a Standardisation strategy for the single market (2022/2058(INI))

January 2023

Amendment 1

Draft report text	SBS proposal
<p>General remarks</p> <p>1. [...] considers that the classification of priority areas for action closely aligns with the weaknesses of the current system identified during the stakeholder consultation; notes also the adoption of, and progress on, the 2022 annual work programme on standardisation.</p>	<p>General remarks</p> <p>1. [...] considers that the classification of priority areas for action largely aligns with the weaknesses of the current system identified during the stakeholder consultation; stresses, however, the insufficient focus of the Strategy on the uptake and implementation of standards, especially among SMEs; notes also the adoption of, and progress on, the 2022 annual work programme on standardisation;</p>

Justification:

An element missing in the strategy is the focus on the uptake and implementation of standards, especially among SMEs. The use of complex standards remains a challenge for SMEs, which hinders their ability to competitively provide their services. This is especially important regarding new technologies. Most SMEs need assistance and training on the application of standards and adapting them to their specific needs.

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Amendment 2

Draft report text	SBS proposal
<p>General remarks</p> <p>2.[...] recalls that standards are a voluntary, market-driven tool providing technical requirements and guidance, the use of which facilitates the compliance of goods and services with European legislation and supports the development of European policies in an accountable, transparent and inclusive way; stresses, however, that standards cannot be seen as EU law, since legislation and policies regarding the level of consumer, health, safety, environmental and data protection, and the level of social inclusion, are determined by the legislator;</p>	<p>General remarks</p> <p>2. [...] recalls that standards are a voluntary, market-driven tool providing technical requirements and guidance, the use of which facilitates the compliance of goods and services with European legislation and supports the development of European standards in an accountable, transparent and inclusive way, ensuring that the needs and specificities of all relevant stakeholders, including SMEs and societal actors, are taken into account; stresses, however, that standards cannot be seen as EU law, since legislation and policies regarding the level of consumer, health, safety, environmental and data protection, and the level of social inclusion, are determined by the legislator;</p>

Justification:

Although there have been considerable advances towards inclusiveness, there is room for improvement in terms of inclusiveness and transparency, also by ensuring the effective participation of the stakeholders represented by Annex III organisations (ANEC, ECOS, ETUC and SBS) at the European level.

Amendment 3

Draft report text	SBS proposal
<p>Leveraging the European standardisation system 11. Stresses that there may be inherent limits to speeding up the standardisation process, as the preparation of standards, citation of harmonised standards and industry implementation of those standards all add time before market adoption; [...]</p>	<p>Leveraging the European standardisation system 11. Stresses that there may be inherent limits to speeding up the standardisation process, as the preparation of standards, citation of harmonised standards and industry implementation of those standards all add time before market adoption; <i>calls for stable, clear criteria for the assessment of harmonised standards, commonly understood by all stakeholders, as well as for the provision of the necessary resources to ensure the timely assessment and citation, particularly with regards to the work of the HAS consultants; [...]</i></p>

Justification:

Stable and clear criteria for the assessment of harmonised standards are needed but also enough resources to be put in place for the assessment of candidate harmonised standards and particularly the so-called Harmonised Standards (HAS) consultants to ensure that the process works smoothly. The lack of resources at the end of the previous HAS consultants contract and the gap between the previous and the current HAS consultants contracts led to a backlog in the citation of standards.

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Amendment 4

Draft report text	SBS proposal
	<p>Leveraging the European standardisation system <i>11a. Stresses the importance of avoiding an excessive proliferation of standards; when setting priorities for standardisation and the issuing of new Standardisation requests, the starting point should be an overview of existing relevant standards and only develop new ones where clear gaps are identified; underlines the importance of providing support for the uptake and use of standards specially among SMEs</i></p>

Justification:

It is already difficult for companies and especially SMEs to find their way among the increasing number of European and international standards being developed every year. It is therefore very important to avoid the proliferation of standards. When new topics emerge, there is a tendency to immediately create or request new standards. Nevertheless, whenever possible we should rather look at adapting existing standards rather than creating new ones, as it is difficult for SMEs to have an overview of all relevant existing standards. This aspect must be carefully considered

both when the Commission issues standardisation requests to the European Standards Organisations (ESOs). There is also a need to have a stronger focus on uptake and implementation of standards, not only their development, especially among SMEs.

Amendment 5

Draft report text	SBS proposal
<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system</p> <p>12. [...] considers that the role, participation and input of relevant stakeholders, including those representing, inter alia, SMEs and environmental, social and consumer interests, should be evaluated and strengthened where such reforms may be beneficial and complementary to work envisaged by the ESOs following the Commission’s call for them to present proposals to reform their own internal governance;</p>	<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system</p> <p>12. [...] considers that the role, participation and input of relevant stakeholders representing, inter alia, SMEs and environmental, social and consumer interests, should be evaluated and strengthened following the Commission’s call for the ESOs to present proposals to reform their own internal governance, by:</p> <ul style="list-style-type: none"> • systematically and actively facilitating the participation of SMEs and societal stakeholders’ representatives within National Standardisation Bodies (NSBs); • Strengthening the rights of Annex III organisations within the ESOs by expanding the right for opinion and broadening their right of appeal • Raising awareness about the role of Annex III organisations and promoting the use of tools such as the e of existing tools such as the CEN-CENELEC Guide 17 providing guidance for writing standards taking into account micro, small and medium-sized enterprises (SMEs) or the SME Compatibility Test for standards

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Justification:

The inclusiveness of the European standardisation system and the role of Annex III organisations is enshrined in Regulation 1025/2012, which clearly states “*ESOs shall encourage and facilitate an appropriate representation and effective participation of all relevant stakeholders, including SMEs, consumer organisations and environmental and social stakeholders in their standardisation activities, in particular through their European stakeholder organisations*”. Facilitating and supporting access at national level will also have an important knock-on effect on European and international standardisation, for those standards bodies relying on the national delegation principle. Existing tools such as the Guide 17 or the [SME compatibility test](#) developed by SBS should also be further promoted to ensure standards are developed with SMEs' needs and characteristics in mind.

Amendment 6

Draft report text	SBS proposal
<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system</p> <p>13. Welcomes the focus on national-level involvement of wider stakeholders in standardisation activities; notes</p>	<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system</p> <p>13. Welcomes the focus on national-level involvement of wider stakeholders in standardisation activities,</p>

<p><i>that not all organisations listed in Annex III have national counterparts in the Member States</i>; considers that the Commission may direct funding or technical support to those organisations to ensure participation in national standardisation activities, including not only technical work on standards, but also the preparation of positions vis-à-vis standardisation requests at the European and international levels, thereby reinforcing the inclusivity of the process as a whole;</p>	<p>particularly the announced launch of a peer-review process among Member States and NSBs to achieve better inclusiveness and SME-friendly conditions for standardisation; considers that the Commission may direct funding or technical support to ensure participation in national standardisation activities, including not only technical work on standards, but also the preparation of positions vis-à-vis standardisation requests, thereby reinforcing the inclusivity of the process as a whole; stresses the importance to ensure that additional financial support for the participation of SMEs and SME associations is provided by Member States at the national level; [...]</p>
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Justification:

The strategy announces the launch of a peer-review process. This process can help to identify existing best practices at national level for inclusiveness and representativeness and to have them shared and widely implemented. The references to Annex III organisations to be involved at national level may not be most relevant at this time, as this may require considerable resources; The Commission and EFTA are already providing funding at European level, it may be more appropriate to ask Member States to complement these funding at national level for the involvement of the national stakeholders that form part of the categories of stakeholders represented by these organisations at national level (SMEs, consumers, environmental NGOs, trade unions). Standardisation requests are always developed at European level and addressed to European Standards Organisation (ESOs), not to the international standards organisations.

Amendment 7

Draft report text	SBS proposal
<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system 14. Recognises the need for a consistent approach towards technical or common specifications, in particular as different legislative processes may give rise to divergent provisions; considers, therefore, that this mechanism should only be used in exceptional circumstances and only while relevant standards do not exist; [...]</p>	<p>Upholding the integrity, inclusiveness and accessibility of the European standardisation system 14. Stresses the need for a consistent approach towards technical or common specifications and is concerned that different legislative processes may give rise to divergent provisions; considers, therefore, that this mechanism should only be used in exceptional circumstances, only while relevant standards do not exist and by ensuring the involvement of all relevant stakeholders; [...]</p>

Justification:

There is a need for a consistent approach towards common specifications. The fact that provisions regarding common specifications are currently enshrined in different pieces of legislation (Machinery Regulation, Eco-design for Sustainable products, Batteries Regulation, AI Act...) under development has the risk to leading to divergent wording or provisions in the corresponding final texts. Given the lack of clarity so far on the process of production of said common specifications, should such a mechanism be invoked by the Commission, it is important to reiterate that all relevant stakeholders should be involved in their production in a fully transparent process.

Amendment 8

Draft report text	SBS proposal
	<p>Setting international standards</p> <p><i>17a. Highlights that the effective participation of European SMEs and societal stakeholders in international standardisation continues to be a major challenge; calls for the European Commission and the ESOs to engage with international counterparts and like-minded trade partners to ensure greater inclusiveness of the international standardisation system and stronger representation of all stakeholders;</i></p>

Justification:

Concrete and incisive measures should be pursued to increase the inclusiveness of international standardisation and the representation of all European stakeholders, particularly in light of the increasing number of international standards being adopted at the European level.

Amendment 9

Draft report text	SBS proposal
<p>Ensuring future standardisation expertise</p> <p>19. Supports the development of awareness-raising and training programmes aimed at developing pathways towards standardisation activities for academics, future industry professionals and policymakers; [...]</p>	<p>Ensuring future standardisation expertise</p> <p>19. Supports the development of awareness-raising and training programmes aimed at developing pathways towards standardisation activities for academics, vocational education and training (VET), future industry professionals and policymakers; calls for training and mentorship programmes to be launched to promote awareness of standards and the benefits of standardisation, particularly aimed at SMEs and other underrepresented stakeholders in standardisation; [...]</p>

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Justification:

SMEs are often unaware, or at least insufficiently aware of standards and the possible benefits of standardisation. They do not always know which standards exist, how they would benefit from them or how to find out more. Training programmes should help SMEs to understand the role of standards and their benefits regarding issues such as market access, risk management, the adoption of new technologies or innovation. Training materials are available, but these are not always tailored to SMEs and there is no single point where all resources are available and structured in a coherent way. There is also a need to integrate standardisation aspects in existing curricula not only of universities but also in vocational training and life-long learning.