



## Review of the European Standardization System:

### The issues for the European Committee for Standardization (CEN) and for the European Committee for Electrotechnical Standardization (CENELEC)

#### Executive Summary

European Standards exist primarily to support and serve the **competitiveness** of the European Industry. European Standards are also an appropriate vehicle to introduce **innovative** solutions or products into markets. Involvement of the private sector in the standardization process is crucial to keep the market relevance of the system and to continue serving the market needs and disseminate innovation. **Industry bears up to 95% of the costs** of the system. This high implication of industry reflects their satisfaction with what the current system offers and delivers. The private sector comes to European standardization to find complete and stable solutions. The **voluntary** aspect of European standards is therefore highly important. The CEN and CENELEC standards provide quality and in time solutions. Whereas indeed some fast-evolving technologies may require a rapid time to market, this differs from sector to sector. The uniqueness of our system based on the national implementation of European standards not only opens up markets but our close link with the **international standardization** bodies also fosters global trade and reinforces European industry's global competitiveness.

The principles of **national delegation**, national vote, and national implementation enable technical harmonisation in Europe, the enforcement of European Standards at national level, the dissemination of innovation and easy access to all stakeholders, **including SMEs** and are the cornerstone of the system.

In a context of global change, European standardization has evolved according to European needs and will continue to do so. The past few years have focused on facilitating the **integration of societal needs** through providing an open platform accessible to all stakeholders. The **economic benefits** of European standardization are already addressed by various studies mentioned in this position paper. To ensure the **financial sustainability** of the system is the only way to optimise its benefits. The success of the European standardization model and the efficiency of the system serve the interests of European stakeholders and enable the continuous consolidation of the European Single Market.

The important role that European Standards play in the development and consolidation of the European Single Market and the support they provide to other EU policies, create a strong link between standardization and legislation, which justifies the ongoing EC support for the European standardization model.

The European Commission's ongoing exercise to revise the legal framework for the European Standardisation System, including the modification of the 98/34 Directive, the Council Decision 87/95 on standardization in the field of information technology and telecommunications, and the European Parliament and Council Decision No 1673/2006/EC on the financing of standardization should not jeopardise the sustainability and efficiency of a successful model or introduce **instability, fragmentation, overlap** and/or complicate stakeholders ability to find relevant standards, or their access to the system.

CEN and CENELEC are committed to adapt continuously to evolving European market needs and to ensure continuous improvement of our system, provided that the pillars on which rest the success of the European standardization model remain intact:

The **voluntary** and **private character** of European standards, the strong commitment to the **work of the international standardization bodies**, the **respect of the WTO TBT code of conduct** principles, the **national delegation principle**, and the **financial sustainability of the system**

## The system is successful and efficient:

The European standardization system, as it is known today, is the result of a long-standing and **successful public-private cooperation** involving various actors: industries, public authorities, consumers, trade unions, etc. Some 80.000 experts work in standardization bringing their knowledge and input from their respective stakeholder groups to raise standards for the benefit of all. A large number of these experts come from medium size enterprises. Industry bears up to 95% of the costs of the system, the remaining 5% being covered by public funding (of which 2% from EC/EFTA). Through the New Approach concept, strong links exist with European legislation. 30% of European Standards directly support EU Directives and give presumption of conformity to the law. This ensures the production of state-of-the-art, high consensus deliverables, widely accepted by the market, which gives a unique role to European Standards.

The system is **effective and efficient** and delivers in time a high number of European standards that satisfy the market needs, as time to market change from sector to sector. Standards are crucial in a modern economy notably for the dissemination of research and innovation results. Despite the image that standardization may have to be more linked to mature projects than new ones, **a coherent set of deliverables** is offered by CEN and CENELEC to address various markets and provide adequate solutions to fast-evolving technologies. New tools have been developed such as Workshop Agreements (CWAs) and platforms (eg “STAIR”) have been set up to address **the link with innovation and research**. Strengthening the link with the research community will remain a key focus for CEN and CENELEC. Recognising fora and consortia’s standards produced outside the European Standardization System would introduce fragmentation and overlaps, not to mention the non-maintenance of the standard. This would entail more problems for **SMEs and societal stakeholders** as to the identification of relevant and applicable standards for their sector of activity and the access to the system.

European standardization capitalises on its **international dimension**. “Work international first” is the motto for CEN and CENELEC. This is ensured through the Vienna and the Dresden agreements binding the two ESOs to their respective international counterparts ISO and IEC. It is worth highlighting that 80% of CENELEC European Standards and 30% of the total collection of CEN standards are actually International Standards. The efficiency of this system and the preservation of European interests are guaranteed by a strong European presence and an influent expertise at international level through the involvement of experts in Technical Committees, in the governance, etc., benefiting from the “one country one vote” principle giving Europe 31 votes in ISO and IEC. European Standards are also widely implemented in non-EU/EFTA countries through the affiliation of neighbouring countries with CEN and CENELEC and therefore constitute the base for national collections avoiding duplication of technical solutions. As part of their outreach activities CEN and CENELEC have also developed cooperation agreements with third countries and regions, are promoting the European standardization model worldwide amongst other through their liaison officers in China and India and are involved in technical assistance projects. Facing the emergence of new regions

(e.g. BRIC), CEN and CENELEC will strive to preserve and strengthen European competitiveness in the international arena.

The international dimension of CEN and CENELEC is crucial for market access and for the dissemination of European innovation worldwide. This together with the market relevance of the standardization system serves **European industry to increase its competitiveness.**

**Economic benefits** brought by standardization are noteworthy. A study run by the UK government in 2005 showed that standards have made an annual contribution of GBP2.5billion to the UK economy and 13% of growth in labour productivity in the UK since 1948. Moreover a macroeconomic analysis mandated by DIN in 2000 shows the economic benefits of standardization to be approximately 1% of the gross national product. Other studies conducted by AFNOR (France) and DS (Denmark) have shown similar results.

The system is in line with the EU principles and values, resting on the principle of **national delegation** (with a weighted vote system and an appeal procedure) as well as with the WTO TBT code of conduct. This concept ensures that all stakeholders can have access to the system and participate in the standardization work at national level and be represented at European and international level. Moreover the uniqueness of the system, which resides in the implementation of European Standards nationally together with the withdrawal of conflicting national standards, contribute to the reduction of the administrative burden, notably for SMEs and helps disseminate innovation at national level.

European standardization therefore provides a **platform for all stakeholders** accessible and useable by all, including societal stakeholders and SMEs. The national delegation principles ensures that all interests are represented in the standardization work and facilitates integration through dedicated actions for specific categories of stakeholders and through the removal of language barriers. Moreover CEN and CENELEC have initiated a study on the improvement of SME participation and access to the system which has led to the identification of 58 recommendations. These are now being implemented and closely followed up by a special Working Group to exchange best practice amongst the national members. Abstracts of European Standards are already in the process of being made available free of charge, a CEN-CENELEC SME Helpdesk has been set up and guidelines have been developed for standardization experts and standards writers to take into account SMEs' needs.

## **We search for continuous improvement:**

CEN and CENELEC recognise that the world evolves and brings new challenges that the European standardization community need to address. These challenges have been identified and actions have been taken accordingly. More will be done in view of providing adequate support and relevant solutions to various needs:

CEN and CENELEC have started to **address new technologies** (e.g., nanotech) and **new sectors** (services) and will continue to do so. CEN and CENELEC will also ensure that additional new sectors will benefit from standardization and from the advantages brought by the New Approach concept. CEN and CENELEC have started working on several high priority projects such as electric vehicles, smart meters and smart grids and are committed to delivering on time a set of standards that will enhance the roll-out of these sectors.

CEN and CENELEC are enhancing their links **with R&D** in order to reinforce the role of standards as a tool for market penetration of R&D results through the development of an integrated strategy, better promotion of the benefits of standardization to relevant R&D partners, and active involvement in EU-funded research and innovation projects.

Along the same lines, in order to familiarise future experts and business leaders to the strategic dimension of standardization for companies' competitiveness, efforts will be deployed to promote the **integration of standardization in education** programmes at every level of the curriculum.

CEN and CENELEC have started looking into the ways to **cooperate with relevant fora and consortia** and will develop closer ties with them in order to capitalise on the complementarities of their work with the formal standardization activities. Fast track procedures already exist (for some consortia such as ASD Stan in the aerospace environment) and further improvement will still be made. CEN and CENELEC will continue to open up the European Standardization System to new actors without jeopardising its relevance or its sustainability.

CEN and CENELEC will also **preserve and increase Europe's influence** on the international standardization scene by securing leadership on specific markets and by engaging on concerted policies for external relations activities amongst others through the CEN-CENELEC-ETSI External Relations Committee's mechanism.

Continuous efforts are also being made to **boost the efficiency of the system** through improvement and harmonisation of IT tools for the benefit all stakeholders. CEN and CENELEC have also harmonised their policy on essential IPRs in standards with the global policy adopted by ISO, IEC and ITU-T. The Future Landscape of European Standardization (FLES) exercise is also starting to bear fruit in several areas where synergies have been achieved through combined efforts leading to increased efficiency and harmonisation of the system.

And last but not least CEN and CENELEC will finalise the **implementation of the European Competitiveness Council conclusions on standardization and innovation** of 25 September 2008.

## However, some fundamentals have to be safeguarded:

This can only be achieved if some fundamentals are preserved:

The **voluntary and private character** of European standards and by extension of the system that has the full commitment and involvement of industry.

The strong commitment to the **work of the international standardization bodies** and the active involvement in their system

The **respect of the WTO TBT code of conduct** principles – transparency, openness, impartiality, consensus, relevance, etc. – which are already accepted by CEN and CENELEC and fully implemented by their National Members and Committees.

The **national delegation principle** conveys a coordinated national viewpoint, involves all relevant stakeholders, thus keeping the system simple and avoiding confusion among stakeholders, spreads innovation, and, as it has been confirmed by the EU Council Conclusions on Standardization and Innovation of September 2008, it is the cornerstone of the system.

The **financial sustainability of the system**, which strongly resides in the sales of standards and the provision of services (consultation, certification, etc.)

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**CEN** - The European Committee for Standardization acts as a business catalyst in Europe, removing trade barriers for European industry and consumers. Its mission is to foster the European economy in global trading, the welfare of European citizens, and the environment. Through its services it provides a platform for the development of European Standards and other technical specifications. CEN's 31 National Members work together to develop voluntary European Standards (ENs) in various sectors to build a European Internal Market for goods and services and to position Europe in the global economy. By supporting research, and helping disseminate innovation, standards are a powerful tool for economic growth. More than 60.000 technical experts as well as business federations, consumer and other societal interest organizations are involved in the CEN network that reaches over 480 million people.

**CENELEC** - The European Committee for Electrotechnical Standardization is officially responsible for standardization in the electrotechnical field. In an ever more global economy, CENELEC fosters innovation and competitiveness, making technology available not only to major businesses but also to SMEs through the production of voluntary standards. CENELEC creates market access at the European level but also at the international level through its cooperation agreement with the International Electrotechnical Commission (IEC). Through the work of its 31 Members together with its experts, the industry federations and consumers, Electrotechnical European Standards are created in order to help shape the European Internal Market, to encourage technological development, to ensure interoperability and to guarantee the safety and health of consumers and provide environmental protection.

# ANNEX

## **CEN and CENELEC response to the questions of the EC public consultation on the Revision of the European Standardization System**

**Q1: Do you think that service standards (including process standards) and alternative standardization documents should be included in the scope of Directive 98/34/EC or its successor?**

CEN and CENELEC agree with this proposition. In practice, the majority of CEN and CENELEC members do notify these standards, and there is a general increase in national and European activities. Extending the concept of the general arrangements of the Directive to service standards also will enable the tried and trusted benefits of the New Approach to be applied in that sector.

However extending the Directive to “alternative standardisation documents” and therefore apply standstill provisions, should not be applicable to other products, such as handbooks and other similar guidance material, nor should it be applicable to limited-consensus, non-standards. Documents such as these are provided by many private and professional bodies in a competitive environment. If NSBs/NCs were not involved in this activity it would simply be undertaken elsewhere, completely outside the formal standards system, with none of the transparency and control that an NSB/NC can ensure. The threat of standstill on these types of projects would simply cause some private sectors to look elsewhere for assistance.

**Q2: Are you aware of specific cases where national service standards and alternative standardization documents have caused technical barriers to trade?**

Whilst detailed evidence is lacking, circumstantially we think there is a greatly increasing tendency of companies to offer cross-border services. Barriers are not necessarily caused by national standards but more often by national standards-like processes (sometimes governmental, sometimes private). There is an increasing stakeholder demand for service standardization activities. In some cases, this demand is clearly related to concerns of business and professional associations to ensure a level playing field to facilitate cross-border provision of services and harmonisation of professional skills.

**Q3: For areas other than Information and Communication Technology (ICT), should it be possible to refer to documents developed by fora and consortia in legislation and public policies? If it should, how should it be implemented?**

This question pre-supposes that in the ICT sector the documents developed by fora and consortia can be referred to in legislation and public policies.

For ICT, as well as outside that area, CEN and CENELEC are not in favour of this method, which would:

- fragment and multiply the number of organizations relevant to standards in Europe (at the time CEN and CENELEC are regrouping their governance and management )
- multiply the number of standards which would finally impede the cohesion and coherence of the European Standardization System, whose values are reflected in the WTO code (see Q6)
- make the life of the stakeholders, especially SME's, consumers, trade unions more difficult because of the need to monitor/contribute to different channels, not to mention the confusion arising from potentially competing standards
- diminish transparency which is deeply linked to the avoidance of technical barriers
- complicate participation of interested stakeholders and diminish the quality of consensus at the time of approving the specifications, and consequently, pave the way to a loss of guarantees and acceptance of the document by the market. If the document is used in support of the legislation or public procurement, may create serious problems, as it will impose a document not based on a full consensus of all interested parties;
- undermine the fundamental principle that most standards referred to in European legislation are implemented as national standards in local languages.

It is to be noted that outside the ICT area, the main US-based standards developing organisations active globally are actually bodies such as ASTM or IEEE, which produce specifications that are often competing with ISO and IEC documents. These specifications can be adopted by ISO and IEC when they are not conflicting existing standards and when they are consistent with the ISO/IEC corpus. CEN and CENELEC perfectly understand and acknowledge that fora and consortia or other organizations can develop specifications that may be useful for the regulatory context but to avoid the above drawbacks, these specifications should be proposed to the ESOs for endorsement and recognition as European Standards, with all the rights and obligations linked to that type of document. In this respect, fast track procedures have been developed in ESOs and examples of good cooperation with industry (e.g. aerospace or steel industries) are far more important in terms of standards contribution in a much wider number of areas than covered by international fora and consortia.

**Q4: How could ESOs and NSOs be encouraged to accelerate their standards development process? Should for example the Community financing for standardization be subject to conditions in terms of speed of delivery whilst maintaining the openness of the process?**

To note that over the last ten years the production time for a European Standard has been drastically reduced. In this respect, the use of modern IT applications and a business-like approach and methods (management of projects) have been key factors.

We can also fast-track standards documents, and indeed informal deliverables such as CEN-CENELEC Workshop Agreements can satisfy stakeholder needs for partial consensus for example in innovative areas. On the other hand, we question the inference that European Standardization is too slow. European standards need to suit the needs of European stakeholders. The timeframe is directly related to the market needs and varies from sector to sector. We support the idea that the quality of the final document and time to market should prevail on the concept of “production speed” (see Conclusions of EU Council on standardization/Innovation dated 25/09/2008). The time needed for standards production in any case heavily depends on the nature and technical/legal environment of a given project, sector and industry. European standards are not noticeably slower than consortia specifications considering the openness and the consensus principle applied throughout the standards development process.

Moreover, it should be reminded that the European standardization system does not work as a “closed shop”: in many cases processes are undertaken within the Vienna or Dresden agreements, in close cooperation with ISO or IEC. The international integration brings added value to the whole system, and especially to standards users and should be respected. By doing that, Europe has implemented most of international standards, far more than the other countries or regions in the world, fulfilling in this way the WTO TBT Agreement directions.

We also believe that the EC financing should be allocated to help achieve results agreed in Business Plans of Technical Committees, not to impose strict deadlines especially when standardisation activities are conducted in a non-harmonized legislative environment. In this respect, it seems more and more obvious that due to the administrative burden created by the EC financial procedures the financial support is creating more difficulties than helping the process. Indeed, one of the main reasons for delays is the heavy bureaucracy combined with the EC financial procedures. It is also to be noted that the lack of consensus amongst stakeholders cannot be influenced by community financing means.

In addition to constantly striving to improve the current standardization process and the speed of delivery, ESOs will also investigate alternative approaches, for example by considering alternative approaches to drafting European Standards and other deliverables, such as the use of paid authors to develop a first draft, the appointment of professional facilitators to work alongside the committee secretariats, etc. These initiatives could be financially supported by the European Commission.

**Q5** (no question 5)

**Q6: Should the WTO principles of transparency, openness, impartiality, consensus, efficiency, relevance and consistency be integrated in the legal framework of European Standardization (especially in EU Directive 98/34/EC or in its successor)? How should this be implemented?**

The ESOs and the CEN and CENELEC national members already comply with the WTO/ TBT principles in any case. Therefore we do not perceive any need to integrate them in the legal framework.

**Q7 (1): How could the participation of consumer organisations, environmental NGOs, trade unions and social partners, and SMEs be best promoted? What should be the role of public authorities (European Commission and Member States) in supporting such a participation in a transparent, open, impartial, consensual, efficient, relevant and consistent European standardization system?**

The participation of consumer organizations, environmental NGOs, trade unions, social partners and SMEs should essentially be promoted through participation in a national delegation. The national delegation principle is the main channel for all stakeholders to express their views, which are formulated and transmitted in a consolidated national position, as it is the case for every decision taken today at European institutional level (see in that respect the EC Council Conclusions of 28 September 2008). European platforms play a role in coordinating, promoting and encouraging stakeholders participation at national level ensuring that societal needs are duly represented. CEN and CENELEC have also engaged their members in a process to implement 58 recommendations to improve SME participation in European standardization – see QA14.

The benefits of national delegation not only reside in the due representation of all stakeholders' interests but also in the facilitation of their participation and access to the system. Indeed stakeholders involvement at national level reduces participation costs, diminishes language barriers and enables them to benefit of targeted national actions and promotions. The support provided by the EC to European organizations representing these societal interests should go in the direction of strengthening the national participation and so providing in fact better legitimacy and democratic representation of the latter

The role of the public national authorities should be the same as the European one – i.e. to support and develop the national delegation concept and so to contribute to the overall objective to promote the benefits of standards for our economy and for citizen welfare.

**Q7 (2): How should NSOs (National Standards Organisations) deepen their cooperation, and mutualise their activities? Could the following tasks be shared amongst several NSOs?**

- 1. Management of the Secretariats of Technical Committees?**
- 2. Notification of new national standardisation projects?**
- 3. Promotion/sales of standards?**
- 4. Other?**

**1-2.** The CEN and CENELEC systems are already a collaborative exercise among members and the mutualisation of the resources is already implemented. For example, not all countries participate in technical activities but all members are required to implement the results. Within this context it is to be noted that the management of technical committee secretariats is directly related to the private sector interest in specific areas of activity which depend on the availability of national expertise and investment capability at national level.

We have however to keep in mind that the notion of national delegation, national vote and national implementation of the results are the fundamental strengths of the system and as such should be preserved.

Procedures already in place in CEN and CENELEC (INFOPRO and Vilamoura) provide the suggested tools and means for the NSB and NCs to envisage possible joint development of standards and this either at national or European level. In addition, CEN has started a New

Business Opportunities Platform, where national members can exchange informal early information on new issues, together with the CEN-CENELEC Management Centre, and thus provide new ideas – this Platform will be extended to CENELEC members also.

Moreover twinning programmes are available, proposing “shadowing” systems whereby a smaller, newer member can gain experience of secretariat management by sitting alongside an established member.

**3.** Europe and by extension European standardization enjoys cultural diversity and is characterised by the national delegation principle which enables Members States and NSBs/NCs to develop their own cultural practices. This is reflected in the approach to promotion and sales of standards which is left to cultural adaptation. Moreover, the relations of NSBs/NCs with their customers enable them to know the needs of their customers and to offer products in services that meet their expectations.

**4.** Close cooperation is already in place between NSBs/NCs where shared objectives have been identified. This is certainly the case in external relations activities where NSBs/NCs join forces in consortia leading technical assistance projects. This mutualisation of activities has been very successful so far and is common practice.

**Q8: Without prejudice to the national delegation principle, how could the European Standards Organisation (ESOs) manage directly, on a case by case basis, some standardisation activities, especially some Technical Committees?**

CCMC can hold identified CEN and CENELEC Technical Committee secretariats; however relevant expertise, resources and financial sustainability would need to be ensured. This practice has been used on rare occasions and indeed is more frequently the case for short-term strategic activities, for example organising Working Groups to assess stakeholder requirements in specific areas.

For the actual standards work, we believe that the system in place today according to which the TC secretariat (and chair) is under the responsibility of a NSB/NC should be maintained but that CCMC continues its role of providing support in facilitating/monitoring/managing/reporting line/following-up of the TC activities. The CEN-CENELEC Management Centre would require considerable additional human and financial resources, and expertise to offer more than this. The Private sector and most governments actually support the current “decentralised” model which has proved to be successful and to meet the needs of our stakeholders as a private organisation. The need for changing this model has not been identified so far.

**Q9: What support should the European Commission provide to facilitate the use of European standards as a means to open global markets? What would be the operational means that the Commission should use? (Support experts’ participation in international standardisation activities, translation of European standards into extra-community languages?)**

Once again, participation in international activities should be made through the national delegations. As such the European Commission should encourage the Member States to

support under-represented stakeholders (as is already implemented by some Member States) that provide support, sometimes for specific stakeholders such as consumers or SMEs to participate in European or in international standards work.

One of the proposals put forward by the European Commission is to help translate ENs into some non-European languages. We are of the opinion that if there is a real need for such translations, the actors (mainly private sector) will find ways and money to do it.

Rather than supporting this type of activity, we believe that the European Commission should devote more money to supporting translation of ENs in all European languages. We would like to point out that in 2010 CEN-CENELEC requested a budget of some 3 MEURO to translate and so better disseminate the ENs in all European countries, but that they will only receive, according to signed contracts, 1.2 MEURO to co-finance the activity. The translation of ENs in all European countries is a task that should only be entrusted to the NSBs/NCs, taking into account not only the complexity of the translations, but also the fact that the national mirror committees have an important role in this activity, which also is key for the real implementation of the standards in the countries.

To facilitate the use of European Standards as a means to open up global markets, the European Commission should consult more often and more regularly the ESOs. A coordinated approach between the EC, the ESOs and the private sectors, mainly European industry in external relations activities would be highly beneficial, identifying and aligning priority areas and key countries/regions. Earlier and automatic involvement of the ESOs in the EC regulatory dialogue on standardization with international partners would help promote the uniqueness and success of the European standardization model and the use of European standards.

**Q10: Under which conditions do you think the European Commission could launch, on a case by case basis, calls for tenders, open to the ESOs and to other organisations, to develop standards supporting EU policies and legislations?**

So far, the mandates for producing European Standards and other publications are transmitted to the 3 ESOs, who decide which ESO will be responsible for what. The attribution is made primarily on the basis of the competence and responsibility, also reflecting the delimitation of sectors at international level (ISO/IEC/ITU).

Proposing calls for tenders would seem to have potential for a disorganisation of the system. Once again it would encourage fragmentation and a lack of coherence, induce delays (e.g. who-does-what?), and impose extra costs. What would be the selection criteria? Minimal costs? Speed? Openness of the procedures? Participants in the standardization work?\_How would the process to publish ENs as national standards be carried out if the ESOs were not themselves producing the EN?

**Q11: What is, in your view, the most efficient level of participation in the process of standards development: national, European, international?**

This question is confusing.

The 3 levels are equally good if the national delegation vehicle is used – as it should be used - to convey your viewpoint. The platform on which standardization should be carried out, should depend entirely on the required content – some standards relate to national issues, some to European ones and some to topics best handled internationally. One of the strengths of the CEN and CENELEC model is that the three levels are deeply interlinked, therefore supporting private sectors' competitiveness at all three levels. The system as it exists today ensures that there is not confrontation between these three levels.

It should also be noted that the private sector chooses the level of standardization to be involved in according to its business strategy.

**Q12: In your opinion, where is the major added value in European standardisation with respect to national standardisation?**

The major added value is certainly the fact that ONE standard is UNIFORMLY implemented in 31 countries with the obligation to withdraw any conflicting standards and thus ensuring that products and services meeting those standards can be offered in all 31 countries (plus currently 15 affiliate members – neighbourhood and candidate EU members). This definitely supports and consolidates the European Single Market.

**Q13: What are, in your view, the most serious barriers to the use of standards by enterprises: costs of standards (purchasing price)? Costs of operational implementation? Access to information? Knowledge of existing standards?**

The costs of accessing standards (thanks to modern technologies) or of purchasing standards (thanks to sales policy at national level) are minor compared to the considerable value that standards bring to industry and other stakeholders. Several studies have shown that such value outweighs the cost and other potential barriers. Indeed, a study run by the UK government in 2005 showed that standards have made an annual contribution of GBP2.5billion to the UK economy and 13% of growth in labour productivity in the UK since 1948. Moreover a macroeconomic analysis mandated in Germany in 2000 shows the economic benefits of standardization to be approximately 1% of the gross national product. Other studies conducted in France and Denmark have shown similar results.

**Q14: What could the standards organisations do, in addition to their current practice, to facilitate the access to standards, especially by SMEs?**

In 2006, a study initiated by the European Commission identified some 26 best practices already put in place by national members to support SMEs and that, in 2009, CEN and CENELEC sponsored a study, which proposed 58 recommendations for improving SME access to standardisation and to standards. The vast bulk of these recommendations also are of potential benefit to other stakeholders, of course. Most represent national best practices that can be taken up by the totality of the CEN and CENELEC members in all 31 member countries. CEN and CENELEC have established a SME Co-ordination Group to ensure the universal application of the recommendations during 2010/2011, together with a helpdesk, and we are currently drawing up proposals for an additional project to support awareness activities aimed at SMEs.

CEN, CENELEC and their members always strive to improve their practices and be responsive to customer needs. Indeed many members are undertaking initiatives, in addition to the implementation of the results of the SME Access Study to improve access to standardization and as such we welcome this consultation question.

Moreover trade federations play a major role in supporting standardization and education on the benefits of participation in standardization activities and of the use of standards. The EC could encourage Member States to increase the knowledge on standardization at national level.