



Mrs Renate Weissenhorn  
Head of Unit  
Standardisation  
DG Enterprise and Industry  
European Commission  
200, rue de la Loi  
1049 Brussels

29 October 2009

Dear Mrs Weissenhorn,

Following the World Standards Day 2009 Conference on 14 October we would like to provide you with some remarks on the issues paper that was prepared by members of the Expert Panel for the Review of the European Standardisation System (EXPRESS).

These comments complement the in-depth contributions that we have sent to the Commission so far. As you may recall, BUSINESSEUROPE highlighted some key issues on standardisation in the framework of the work carried out by EXPRESS in its position paper dated 2 June 2009. We also provided comments in relation to the White Paper on ICT standardisation on 11 September 2009. Copies of these two documents are attached for your information.

Specifically on the issues paper, BUSINESSEUROPE broadly welcomes the general direction that EXPRESS is taking in the area of standardisation and we support the more visionary and holistic approach that the Panel has started to take departing from the role of the European standardisation system and how this should be seen in a global context. The role of European standards in improving Europe's competitiveness on open world markets, while promoting its social and environmental values is crucial.

As highlighted during the conference, the overall goal for business in globally operating sectors is to have 'one standard – one test – accepted everywhere'. This means that, except for certain areas that present specific regional characteristics, standardisation should primarily start at the international level and international standards should be fully transposed, without national deviations, and applied globally. Active European participation at the international level should be ensured.

We would also like to take the opportunity to stress the importance of market relevant standards and believe that a strict policy should be followed of only developing standards for which a market need is clearly demonstrated. In this context, a set of criteria or easily applicable evaluation methods should be provided, which could also allow for an assessment of whether a revision of a given standard after a certain time span is necessary or not.



Regarding the involvement of stakeholders in standardisation development, BUSINESSEUROPE would like to reiterate that stakeholders who participate in this process should be committed, knowledgeable and relevant to the development of the standard in question. The right balance needs to be struck between facilitating access to standardisation by stakeholders and the required speed of the standardisation process.

Concerning the standardisation of services, BUSINESSEUROPE believes that simply copying the approach that has been so successful for goods standardisation will not necessarily lead to equivalent results for services. A specific strategy taking into account the peculiarities of the services area needs to be developed. New standardisation projects should not be launched until the need for and feasibility of such standards in each sector has been identified.

Finally, regarding the point on relationships with fora/consortia, BUSINESSEUROPE believes they are valuable because they complement, rather than compete with, the formal European Standardisation Organisations (ESOs). We do however not believe in opening up the system to provide for the general possibility of issuing mandates to standardisation organisations other than the ESOs, or to consortia and fora, since this would undermine the status of the ESOs and the coherence of the system. However, providing a series of principles are respected, we would support a revision of Council Decision 87/95/EEC to extend the possibility of using deliverables from standardisation organisations other than the ESOs to support EU legislation on IT services, public procurement, and wider EU policies in the area of ICT (e.g. e-learning).

For further details we invite you to read the attached documents.

We hope these comments are useful and would be happy to provide further comments to the report that EXPRESS is expected to finalise in January 2010, which will contain more concrete proposals and solutions.

Yours sincerely,

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Director  
Legal Affairs Department  
Internal Market Department