



Mr Antonio Tajani
Member of the European Commission
European Commission
200, rue de la Loi
1049 Brussels

7 March 2011

Dear Commissioner,

I am writing to you in the context of the European Commission's upcoming legislative review of the European Standardisation System, as highlighted in the Commission's Communication on the Single Market Act.

Standardisation has been a central element in the delivery of the single market, in particular through the use of Directives in major industrial areas under the 'New Approach' policy. As well as supporting the regulatory framework, standards provide clear benefits to the wider economy and are an excellent tool to facilitate international trade, competition and the facilitation of innovation in the marketplace.

BUSINESSEUROPE has been actively following this issue and submitted a detailed position paper in May 2010 in response to a Commission public consultation on standardisation. At annex you will find a copy of this position, which remains valid.

Following recent discussions with the Commission and given that the time is approaching for taking decisions on the final text, we would like to highlight some key points that we believe should be taken into consideration when the proposal is drafted:

- The present system has proved to be efficient and consistent, and therefore should be improved without changing its fundamental basis;
- We support the continuation of the principle of national delegation. The involvement of societal stakeholders and SMEs in Europe currently takes place through the national platforms for standards work, the National Standardisation Bodies. This is beneficial for the various stakeholders and offers a work environment in the stakeholders' national language;



- In this context, caution is needed when looking into the governance aspects of the European Standardisation System as any governance reform will have a substantial impact on our members, especially SMEs, which represent more than 90% of BUSINESSEUROPE's 20 million company members;
- It is important for societal stakeholders and SMEs to take an active part in the development of standards. However, the idea of ensuring a 'balanced' representation of such stakeholders is not realistic in practice. Most often neither are the required resources available nor is there interest from all stakeholder groups to participate in the development of all standards. Furthermore, if the issue in question is of major interest to a specific industry group a 'balanced' representation in a standardisation committee might lead to a restriction in the number of other interested parties. What counts is the participants' competences and knowledge on the issue. The final goal must be to have market relevant and innovative standards that fulfil the objectives set;
- The private nature of the standardisation process should continue. The private sector bears up to 95% of the costs of the system. This arrangement reflects the reality of the European market and has ensured an adequate response to market needs and should therefore be preserved. Furthermore, a substantial share of standards developed in the European Standardisation Organisations (ESO) are unrelated to public interests and their development should therefore be left entirely up to the private parties;
- There must be a clear distinction between what should be established politically by law (e.g. energy use targets) and what should be established by standardisation (e.g. the means to achieve those targets);
- The use of standards is, and must remain voluntary;
- European standards should align with international standards as far as possible, to increase the competitive advantage of European business worldwide;
- In this context, the ESOs should take a more proactive role in analysing the impact of a future international standard on the European market. They should also establish enhanced coordination mechanisms to promote European positions at international level;
- The European Commission should focus on further promoting the 'New Approach' policy internationally;



- With regard to extending the scope of standardisation to services, BUSINESSEUROPE believes that new standardisation projects should not be launched until the need for and feasibility of such standards in each sector has been identified;
- EU legislation should only refer to full consensus standards, as issued by the recognised ESOs. In this context, except for some very specific cases in the ICT domain, we reject the idea of launching calls for tenders, open to the ESOs and to other organisations, for the development of standards.

We hope that these elements will be considered in the debates on the future of European standardisation and we remain at your disposal should you wish to discuss this further.

Yours sincerely,



Philippe de Buck