



Ms Maitane Olabarria Uzquiano
CEN-CENELEC Management Centre
Avenue Marnix 17
B-1000 Brussels
Belgium

18 August 2014

Re: Horizontal European standards for services

Dear Ms Olabarria Uzquiano,

As you know, BUSINESSEUROPE has been following the issue of standardisation very closely, in particular the process towards the adoption of the 2012 Standardisation Package.

Following its adoption, the European Commission mandated the European Committee for Standardisation (CEN) in 2013 to identify where new Horizontal European Standards (EN) could be introduced to improve the functioning of the single market for services.

We believe that voluntary European service standards can indeed benefit the services industry by reducing the number of (conflicting) national standards and thus removing potential trade barriers. However, we wish to emphasise that the need to develop a certain standard must be determined on a case-by-case analysis based on thorough impact assessment and must always be market driven, following a comprehensive consultation of relevant stakeholders.

In this context, we appreciate the efforts of in particular CEN, DG MARKT and DG ENTERPRISE to improve the functioning of the single market in this area. Yet, we wish to highlight a few important points that we believe should be taken well into account during the process and consultation of stakeholders.

We fully supported the launch of the Ecorys survey in April to identify possible new areas for European service standards and have - as requested - disseminated the survey to our national member federations and encouraged them and their member companies to respond. At the same time, we believe that it is quite ambitious to hope to attain a complete and realistic picture of all areas and activities where such standards can support organisations and professionals to better perform in the single market through a questionnaire. It would, in our view, certainly not be sufficient to consider the survey results alone as a proper assessment of market needs.



We were also kindly invited to the CEN stakeholder seminar on 27 May, where Ms Annette Dragsdahl (DI) also participated on our behalf. The attendance of relevant stakeholders was unfortunately rather limited. In this setting, the chosen format was also quite challenging, where participants were directly asked on the spot to indicate out of a pre-determined list where horizontal European service standards would benefit the market. While we fully support the intentions, in our view, such a seminar alone would not qualify as a comprehensive consultation of relevant stakeholders.

The fact that the Commission intends to already evaluate a selection of proposals from CEN by the end of 2014 adds to some of our reservations. We wish to see a careful consideration of the areas where developing additional European standards might be appropriate and truly bring added value.

It is essential to fully take into account the needs of the economic operators and determine how new standards would actually positively affect the quality of service without de facto restricting creativity and innovation. This is key to the success of any new European standard.

Moreover, we believe that it is fundamental to assess whether the benefits outweigh the costs of development and implementation of a new European standard. Even though it is voluntary, its introduction might in practice force companies to follow and create de facto requirements, often also developing into certification schemes.

We trust that you will take our views into account during the process and stand ready to discuss the above issues further.

For your information, we will send a copy of this letter to DG MARKT and DG ENTERPRISE.

Yours sincerely,

Jérôme P. Chauvin
Deputy Director General