Raising standards for consumers

Draft

Annual Union Work Programme for European Standardisation 2020

Contact: Chiara Giovannini

Chiara.Giovannini@anec.eu

European Association for the Co-ordination of
Consumers Representation in Standardisation aisbl

Av. de Tervuren 32, Box 27 - B-1040 Brussels, Belgium
T: +32-2-7432470 / anec@anec.eu **/** www.anec.eu

SUMMARY

This position paper expresses ANEC's preliminary views on the draft Annual Union Work Programme for European Standardisation for 2020 (AUWP). .

As a member of the Committee on Standards (CoS)[1], ANEC commented on the previous Union Work Programmes and is pleased to have the opportunity to submit its views on the new draft. ANEC is also a member of the ICT Multi-stakeholder Platform and comments on the Rolling Plan for ICT Standardisation.

For ease of reference, we present our comments on the standardisation actions with reference to the numbering of the Annual Union Work Programme in tabular format.

---

[1] The Committee on Standardisation is established under Article 22 of Regulation (EU) 1025/2012 on European Standardisation.

___

3. Artificial intelligence

Algorithmic Decision Making (ADM) embedded software opens up different types of product safety challenges that are not present in not-connected devices: There is a security dimension that is new and inherent to AI devices which is linked to cybersecurity. It could imply that the safety of the device is corrupted or that the device's processing capabilities and connections are being used for other forms of harm (mining crypto currencies, launch larger cyberattacks, spy on the consumer and other). But security vulnerabilities can also pose a risk to physical safety in some cases (eg: hcked self-driving car). Consumer safety and choice are impacted, consent becomes more difficult (because so few will understand the initial algorithms and they will, with machine learning, change as they 'learn'). Also, from a social perspective information can be used to nudge consumers/ influence consumer behaviour. Based in the announcement made in the European Commission Communication "Artificial Intelligence for Europe", we beleive that present safety standards and legislation need to be updated to meet the new risks posed by AI. We expect this work to start in 2020 also reflecting the Policy Recommendations made by the HLEG on AI and the Guidelines for Trustworthy AI. ANEC believes that safety of automated machines/robots has to be ensured for consumers.

4. Internet of Things

In addition to the comments we make in the section below (Cybersecurity) we would like to mention the need to have Harmonised Standards for the connected products falling under the scope of a possible Delegated Act under the Radio Equipment Directive.

5. Cybersecurity

ANEC welcomes the possibility of new standardisation requests on the Internet of Things (section above) and cybersecurity. The 'smartness or digitalisation' of consumer products and services is an increasing trend but so far very few standards are reflecting it. Internet of Things still has to attain a good level of maturity as regards security, data protection, accessibility and safety, and this means there is now a window of opportunity to make sure that consumer (and other stakeholders) requirements are properly addressed. Standards might also be needed in the context of the European Cybersecurity Act. The following topics might be relevant: Security (authentication mechanisms, encrypted communication, firmware and software update management, password system); Privacy (collection of personal data; data storage and retention policy); Connectivit(y connectivity protocols available (Wi-Fi, Ethernet/Lan, Bluetooth); Sensors (description of device's sensors (audio, video, motion and environmental).

___

6. Autonomous vehicles

ANEC welcomes automated driving technologies (e.g. Electronic Stability Control (ESC), Automated Emergency Braking (AEB), Intelligent Speed Assistance (ISA) and lane-keeping systems etc.) which are already preventing collisions and deaths on our roads. But besides the safety advantages, automated and connected cars are also among the high-risk products (potential malfunction of vehicle systems, data safety, cyberattack (hacking, tampering), liability in case of an accident, communication and ethical questions ((does car to decide to hit a group of young or old people if an accident cannot be avoided)). Before Level 5 automated cars are deployed widely on European roads, a harmonised regulatory framework for automated driving needs to be established at EU level[2].

7. Energy efficiency

We think that standards might be need with regards to possible Implementing Acts about demand side flexibility and emerging services that support consumer participation in demand response schemes.

16. International cooperation

It must not be forgotten that the European Standardisation Organisations, as part of the European Standardisation System, are bound by the requirements of Regulation (EU) 1025/2012 whereas ISO and IEC are not. This asymmetry, especially as regards inclusiveness, should be the driver behind the European Commission policy on international standardisation. We should also not forget that the rules on the adoption of ISO (and IEC) Standards and European Standards are different, with the adoption (and implementation) of ENs of course obligatory (regardless of the origin of the EN). Hence we think that the Commission should be cautious in ensuring that CEN-CENELEC-ETSI have all the checks and balances are in place in the adoption of an ISO standard as an EN, regardless of whether it is the result of a direct adoption or parallel development.

17. Inclusiveness

Although there has been much useful progress by the ESOs over the past years in ensuring a strengthened voice for the Societal Stakeholder Organisations among the Annex III Organisations, one that complements the national delegation principle, we believe it appropriate to underpin this progress with a proposal to the ESOs to take further actions, notably on supporting the Annex III Organisations in international standardisation (complementing JIS Action 15) and ensuring the ESOs give added visibility to the Annex III Organisations through a distinct category of partnership or membership.

---

[2] Please see also ANEC/BEUC position paper 'Cybersecurity for connected products' (https://goo.gl/cF86eV).

2 | Specific comments

22. Electronic Identification and Authentication and trust Services

It is essential that any eIDAS standards take into account the needs of consumers with disabilities. This is not the case for the current electronic signatures' standards.

28. Low voltage direct current

We suggest to also to consider (under another priority line) Harmonised Standards for common chargers falling under the scope of a possible Delegated Act under the Radio Equipment Directive (or other legislation).

45. European Accessibility Act

ANEC welcomes the development of Harmonised Standards on accessibility requirements for products and services. It will be essential that the standardisation request implementing the European Accessibility Act contains clear requirements for the standards to be drafted as well as clear priorities for the areas to be covered by the standards. A mapping of existing accessibility standards which could be used, is going to be useful.

New actions

While certain actions concern services (e.g. AI or cybersecurity), we regret no specific mention on service standards is made. We think it would be appropriate to mention the implementation of the CEN Strategy on service standards and related prioritisation made on new possible areas of work.

ENDS.

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

Designed by AdGrafics.eu

ANEC

Raising standards for consumers

ANEC is supported financially by the European Union & EFTA