ANEC comments on European Commission Rolling Plan for ICT standardisation (review)

Introduction

ANEC is a member of the European multi-stakeholder platform on ICT standardisation, which collaborated in developing the Rolling Plan. We are pleased to hereby express our views on the review of the Rolling Plan and look forward to further discuss it within the collaborative process of the MSP. We note that the Rolling Plan is a living document, which is meant to be regularly reviewed, and that work is yet to be continued.

As a membership based association, our views reflect the feedback we have received from our members following their consultation.

3.2.1 eHealth

No information is provided on the very recent MSP activity to list certain eHealth specifications from IHE. <u>This should be mentioned.</u>

The list in section C.2 of "ongoing standards developments" is mainly listing research projects, many of which do not even look to be standards-related. <u>Move to other section.</u>

There is no link between the policy issues discussed in section C.3 and the standards actions in D.1 (eg plug-and-play and healthy ageing). <u>Create link.</u>

The standards actions that are in D.1 are too general to know what methodology the MSP envisages to adopt. It is in the interests of patients as well as public expenditure that good eHealth standards are implemented. <u>Provide more details in section D.1.</u>

ANEC sees a need for standardising a data protection framework for the development of ICT in the field of eHealth (Privacy by Design) in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. <u>Mention in D.1 proposal for Privacy by Design standards for eHealth applications and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).</u>

A N E C - The European Consumer Voice in Standardisation
Av. de Tervueren 32, box 27, B-1040 Bruxelles, Tel.: +32 (0)2 743.24.70, Fax: +32 (0)2 706.54.30
anec@anec.eu - www.anec.eu

Raising standards for consumers

Suggestion to hold a dedicated event to discuss what is needed in eHealth standards in order to develop proper standardisation strategy.

3.2.2 Accessibility

Reference to publication of EN 301549 and other deliverables of M/376 should be mentioned. Add reference.

It might be a bit too early to update EN 301549. On the other hand the additional activities proposed look interesting and useful.

3.2.3 Web accessibility

Activities listed under C.2 as "ongoing standards developments" are not standardisation but research projects. . Move text to another section.

Adoption of Web Accessibility Directive might entail need of supporting standards. Add in D.2 possible standards to implement Web Accessibility Directive.

3.2.4 e-Skills and e-Learning

CEN/ISSS Learning Technologies Workshop was closed and should not be mentioned. Delete reference to CEN/ISSS Learning Technologies Workshop.

ISO/IEC JTC1 SC 36 "Information technology for learning, education and training" should also be mentioned. Mention ISO/IEC JTC1 SC 36.

3.3.2 eInvoicing

Directive 2014/55/EU on electronic invoicing in public procurement was adopted on 17 April 2014 and its Article 3 requests standardisation activity to complement the legal provisions, there is a standardisation mandate/request and new CEN activity etc. The text should be updated to reflect this.

There is a statement in the policy objectives about eInvoicing "[promotes] ready accessibility to users with disabilities". We would be grateful to get more information about this issue and the standards planned and how it relates to automated eInvoicing.

3.4.1 Smart Grids and Smart Meters

Paragraph 8 of section C.1 (starting "Policy aspects....") is repeated exactly in the first three sentences of paragraph 2 of section C.2. Delete repetition.

ANEC sees a need for standardising a data protection framework for the development of ICT in the field of smart grids and smart metering (Privacy by Design) with a dedicated Commission request/mandate, in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. <u>Mention in D.1 proposal for Privacy by Design standards for Smart Grids and Smart Meters applications and services and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).</u>

3.4.2 Smart Cities / Technologies and Services for a Smart and Efficient Energy Use

In order to avoid confusion, these topics should be separated into different RAP items/section, one on smart cities and one on energy technologies. <u>Create two items/sections (one on smart cities and one on energy technologies).</u>

From a consumer/citizen perspective, the title of the section should reflect that standards on smart cities are developed also in the interest of consumers/citizens. <u>Change title of item/section into "Smart Cities and Communities".</u>

Section C.1 needs updating to take account of the current EIP Call for Commitment and clustering exercise. <u>Update section C.1.</u>

The first three paragraphs of section C.2 are not standardisation but research or similar. <u>Move text to other section.</u>

Section C.2 needs to include the ISO/IEC JTC1 activity. <u>Include ISO/IEC JTC1 activity.</u>

Section D.1 should reflect the fact that the SCC-CG is preparing its report on standards issues for the end of the year, and also that the EIP clustering exercise is asking the ESOs to "manage" the standards part of the EIP's Operational Implementation Plan. <u>Update text</u>.

ANEC sees a need for standardising a data protection framework for the development of ICT in the field of smart cities and communities (Privacy by Design) with a dedicated Commission request/mandate, in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. <u>Mention in D.1 proposal for Privacy by Design standards for Smart Cities and Communities and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).</u>

3.5.1 Cloud computing

In addition to security and international standards, ANEC sees a need for European standards on data protection framework for the development of cloud computing in specific market segments (Privacy by Design) with a dedicated Commission request/mandate, in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. Mention in D.1 proposal for Privacy by Design standards for Cloud Computing and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).

3.5.2 Open Data

There needs to be a mention of citizen/consumer requirements for better standards to prevent misuse. Cross-refer to the "ePrivacy" item (3.5.8).

The brackets around "Open" in the title are confusing and should be removed. Remove brackets around "Open".

3.5.3 eGovernment

Text contains duplications and problems with heading numbers. Check numbering of headings.

3.5.4 eID and trust services

CEN TC 224 "Personal identification, electronic signature and cards and their related systems and operations" should be mentioned in the section on standardization activities. Mention CEN TC 224 "Personal identification, electronic signature and cards and their related systems and operations".

EU co-funded projects such as STORK should not be mentioned as standardization activities. Move to other section. Projects such as FIDELITY should also be mentioned.

In addition to security, ANEC sees a need for standards a data protection framework for the development of ICT trust services in specific market segments (Privacy by Design) with a dedicated Commission request/mandate, in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. Mention in D.1 proposal for Privacy by Design standards for ICT trust services and/or reference to European Commission draft standardization request in support of the

implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).

3.5.5 RFID

The deliverables of M/436 (CEN EN 16570 "Information Technology – Notification of RFID – The information sign and additional information to be provided by operators of RFID application system", CEN EN 16571 "Information technology – RFID privacy impact assessment process"; CEN/TR 16669 Information technology - Device interface to support ISO/IEC 18000-3; CEN/TR 16670 Information technology - RFID threat and vulnerability analysis; CEN/TR 16671 Information technology - Authorisation of mobile phones when used as RFID interrogators standard; CEN/TR 16672 Information technology - Privacy capability features of current RFID technologies standard; CEN/TR 16673 Information technology - RFID privacy impact assessment analysis for specific sectors standard; CEN/TR 16674 Information technology - Analysis of privacy impact assessment methodologies relevant to RFID standards) have been approved recently and should be published in the next months. Update text.

3.5.6 Internet of Things

In order to ensure proper development of IoT in the interest of all stakeholders, including consumer, a standardisation request/mandate to the ESOs is appropriate. ANEC sees a need for standards on a data protection framework for the development of IoT in specific market segments (Privacy by Design) with a dedicated Commission request/mandate in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. Mention in D.1 proposal for Privacy by Design standards for IoT services and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).

3.5.7 Network and Information security

ISO/IEC JTC1 SC27 "Information Security" has to be mentioned as well. Add reference to ISO/IEC JTC1 SC27.

ANEC sees a need for standards on a data protection framework for the development of information security systems in specific market segments (Privacy

by Design) with a dedicated Commission request/mandate in line with Article 23 of the proposed Data Protection Regulation which requires data protection by design and by default and which acknowledges a standards-based approach. <u>Mention in D.1</u> proposal for Privacy by Design standards for Network and Information Security services and/or reference to European Commission draft standardization request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies (cross-reference section 3.5.8 e-Privacy).

3.5.8 e-Privacy

ISO/IEC JTC1 SC27 "Information Security" has to be mentioned as well. <u>Add reference to ISO/IEC JTC1 SC27.</u>

No reference is made to the recent European Commission proposal for a standardisation mandate/request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies. <u>Add reference to European Commission proposal for a standardisation mandate/request in support of the implementation of privacy management in the design and development and in the production and service provision processes of security technologies.</u>