



Raising standards for consumers

POSITION PAPER

Draft

Annual Union Work Programme for European Standardisation 2021



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Raising standards for consumers

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SUMMARY

This position paper expresses ANEC's preliminary views on the draft Annual Union Work Programme for European Standardisation for 2021 (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 structure 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.

1 | General Comments

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 and ensuring the ESOs give added visibility to the Annex III Organisations through a distinct category of partnership or membership.

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 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.

2 | Specific comments

Projects

Essential requirements relating to access to emergency services, set out in Article 3 (3) (g) of RED

While we welcome the initiative about emergency caller location, we would like to also mention the need to have Harmonised Standards for security and privacy of connected products falling under the scope of a possible Delegated Act under the Radio Equipment Directive.

Ecodesign and energy labelling requirements covered by Regulation (EU) 2019/2024

What ANEC sees missing is an ambitious plan to continue developing at vertical level the material efficiency standardization work started with mandate M/543. There is a risk of losing momentum and time if we don't transfer general horizontal standards to specific product group standards as soon as possible.

All the essential requirements laid down in Annex I to Directive 2014/33/EU (Lifts Directive)

We welcome the development of new standards for lifts. In addition to the need to continue the elaboration of EN 81-76 on Evacuation of disabled persons using lifts, we think the revision of EN 81-70 on accessibility of lifts should also be considered. While two revisions are currently on-going, it is important to clearly state the policy accessibility expectations which the standards have to meet. In addition, we would like to sound a notion of caution about the proposed importing of ISO 8100. International standardisation does not follow the same rules as European Standardisation.

Directive 2001/95/EC on General Product Safety (GPSD)

We see the need for the European Commission to formally request CEN to transpose CWA 17533 on community masks into a formal CEN standard. This adoption of a formal standard would allow for better market surveillance and consumer protection as it would harmonise the requirements for such face coverings. It would also contribute to the management of the COVID 19 crisis as consumers will need to use such products more and more in the near future. The standardisation request should already be issued now (under an emergency procedure as not present in the AUWP 2020).

We also suggest for a standardisation request to be elaborated for sports, playground and recreational equipment.

Regulation (EU) 2017/745 on Medical Devices (MDR) and Regulation (EU) 2017/746 on In Vitro Diagnostic Medical Devices (IVDR) - on the basis of the new 2020 Standardisation Request in support of MDR and IVDR

Medical treatment tables (physiotherapy practices, hospitals) with electric height adjustment are not covered by the latest version of the SReq.

In 2018, ANEC was informed of an accident in Iceland where a girl got her head stuck in such a table. We also know that several workers were seriously injured or killed in accidents when they got trapped in these tables. There is no EN for these products. A German standard is under development. In order to make therapy tables safer throughout the EU, a European standard should be set up. CLC TC 62, which already developed European standards for hospital beds, would in our opinion be best placed to deal with this work.

We have a query as to what are 'sectorial' technologies. Underpinning this query is a concern that if sectors are defined too narrowly in the sphere of medicine this could reduce the potential for interoperability and, therefore, increase the potential for consumer detriment (restriction in choice, enabling vendor lock-in, etc.). Of course the 'defence' against this argument here will be that the technologies in question will mostly be within hospitals and other institutional settings, but this is not always the case - as (some) technologies are increasingly available for people at home.

Ecosystems for the recovery

Tourism

Further to the continuation of work following M/517 “for the programming and development of horizontal service standards” in CEN TC 447 ‘Horizontal standards for the provision of services’, a strategic approach continues to be needed to identify and address across sectors the new trends affecting the way services are provided and consumed. This is very evident in the tourism sector. The efforts made to increase awareness about services standardisation and better understand the needs of service stakeholders risk otherwise being lost.

Health

We also see a need to look into needs and opportunities in the area of digital health. Under this umbrella, telecare and telehealth services make it increasingly possible for people (patients) to access health and related support services when travelling or when at home, in the workplace or elsewhere. With the COVID-19 pandemic, the need to consider the manner in which health services are provided and/or accessed, mediated by technologies including via tele- or video-consultations has taken a whole new dimension. It is clearly evident that existing systems (from Electronic health records (EHRs) to activity monitoring systems) have operated in silos. These silos are rarely interoperable and have fostered vendor 'lock-ins' - to, in both cases, considerable social detriment. At this juncture it becomes absolutely essential that standards address (with urgency) the needs that arise both for products (e.g. for products and technological platforms) and services in the area of digital health.

Digital

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); Connectivity (connectivity protocols available (Wi-Fi, Ethernet/Lan, Bluetooth); Sensors (description of device’s sensors (audio, video, motion and environmental). We believe 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 2021 also reflecting the EU approach on Trustworthy AI. ANEC believes that safety of automated machines/robots has to be ensured for consumers.

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.

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