

Preliminary comment of ANEC on the review of the CEN Strategy 2010

Introduction

ANEC welcomes the review process of the CEN Strategy 2010. We very much appreciate the opportunity to comment on the review, and in particular the invitation by the CEN Secretary General on the occasion of the CEN External Policy Network on 12 September 2005 to provide written input before the brainstorming meeting of CEN members on 5 October 2005.

Unfortunately the opportunity provided has its constraints due to the short period for reaction and the fact that there is no mid-term assessment of what has been achieved to date in terms of objectives set by the CEN strategy 2010 and in terms of challenges and problems encountered during the implementation phase.

Recommendations

- ANEC agrees with CEN's assessment of their new environment, as mentioned at the CEN External Policy Network meeting on 12 September 2005, namely: More members and more complexity due to enlargement; Globalisation of standardisation, trade and economy; New actors such as China and India; US strategy on standardisation; Emerging of services as a new field of activity; Commission's strive for better regulation; Converging technologies; CEN/CENELEC collaboration and New financial rules of the EU.
- On the basis of the long standing experience of consumer participation in standardisation, ANEC has elaborated ideas and proposals on how to improve stakeholder participation in the CEN system. ANEC would be pleased to discuss with CEN members in detail. For instance, upon request from ANEC, CEN has introduced an informal "Early conflict resolution mechanism" in 2004. However, this mechanism which is primarily aimed at solving objections to draft standards following the enquiry has not yet been incorporated into the formal CEN rules.
- Most prominently, ANEC calls upon CEN members to add the principle of **balanced representation** to their set of principles. Balanced representation means **fair and equal chances for societal stakeholders and minorities**, such as consumers, to influence the standardisation process and to have their views taken into account.

This request of ANEC is actually mentioned and mirrored in the CEN Strategy 2010 (see Point 3.2, page 12): *"Based on their statutes and on their procedures the NSBs ensure that all interested parties (even national minorities) have a fair chance to participate actively in the development of European standards."*

- ANEC urges CEN members to put this commitment into practice. We would be happy to provide support and help in elaborating adequate procedures.

- We believe that the obligations of the National Standards Bodies need to be more detailed and their practices have to be subject to reporting requirements and review.
- Balanced representation is of particular importance whenever the public interest is concerned. It is also very important in the role the European Commission is assigning to the European Standards Bodies in the context of the Lisbon agenda (growth and jobs) and considering the shift of standardisation to new policy areas such as services.

Conclusion

ANEC very much welcomes the opportunity to comment on the review of the CEN strategy 2010. We attach particular importance to emerging sectors for standardisation, in particular the services area.

ANEC is convinced that the CEN system has to be reformed and improved in order to be equipped to deal with the challenges it is facing, in particular with respect to standardisation work where the public interest is concerned. ANEC is in the process of elaborating a more comprehensive paper reflecting in detail our ideas and proposals for change.

Whilst fully recognizing the difficulties for CEN and the National Standards Bodies, ANEC is concerned by the lack of progress in improving the balance of consumer and other societal stakeholder representation in the standardisation process. ANEC calls for a joint initiative to address this issue with the aim to provide fair and equal chances for societal stakeholders and minorities, such as consumers, to influence the standardisation process and to have their views taken into account.