



Raising standards for consumers



POSITION PAPER

Draft Annual Union Work Programme for European Standardisation 2016

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1. Introduction

This position paper expresses ANEC's preliminary views on the draft Annual Union Work Programme for European Standardisation for 2016.

As a member of the Committee on Standardisation (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 as such we often comment on the Rolling Plan for ICT Standardisation².

For ease of reference, we follow the order of the headings & numbering of the Commission document, focusing on aspects of consumer relevance. We present our comments in a tabular format to match the format of the Union Work Programme.

2. General Comments

2.1 Effective Participation of Annex III Organisations

ANEC understands that the Commission intends to develop the AUWP further to include policy proposals as well as actions.

Noting this, we would welcome a proposal for the ESOs to consider further measures to enhance the effective participation of the Annex III Organisations, particularly in complementing the national delegation principle and so ensuring that European Standards are as robust as possible and have the broadest stakeholder support as possible.

Although we accept that CEN-CENELEC, especially through its Societal Stakeholders' Group, and ETSI are willing to reflect on the additional needs of Annex III Organisations, we believe these commitments should be underpinned by a formal proposal in the AUWP.

In our view, the proposal needs to ask the ESOs to consider – with the Annex III Organisations – what further rights may be needed to ensure effective participation of the Annex III Organisations in:

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

² [ANEC comments on European Commission Rolling Plan for ICT standardisation \(review\)](#)

- the technical discussion of draft European Standards (especially noting the decision of CEN-CENELEC to make the Formal Vote optional by default, so reducing the consensus-building steps in which the Annex III Organisations can participate);
- the adoption of European Standards, while respecting the national delegation principle;
- the ratification of European Standards, especially where the publication of a European Standard would be detrimental to health & safety or otherwise damage the reputation of the ESS.

Remembering the EY report on the Independent Review of the ESS, we believe this proposal should also consider whether the visibility and effectiveness of the Annex III Organisations would be improved through the creation of a separate category of partnership (in CEN-CENELEC) or membership (in ETSI).

Separately, against the background of globalisation, we would welcome a proposal that would require the partners in the ESS, but especially the EC/EFTA, ESOs and Annex III Organisations, to review the lead of ISO-IEC in the development (or revision) of European Standards that are (or were) the subject of a mandate or standardisation request. We were especially alarmed to note that the latest Guidelines to the ISO-CEN Vienna Agreement³ (which are in effect the rules for the implementation of the Vienna Agreement), indicate that the revision of European Standards identical to ISO Standards should take place under ISO lead, even if the original EN was developed in CEN under EC mandate. For many reasons, the voice of the weaker stakeholders represented by Annex III Organisations in the ESS is feeble or absent in many international (ISO-IEC) committees. Hence we believe that work that was (or is) subject to a standardisation request (or mandate) should be done in Europe unless there is consensus among all European stakeholders that the work be led at the international level.

³ p9, Vienna Agreement Guidelines, 6th edition (January 2014), <http://goo.gl/QmuEx0>

2.2 Specific comments

UAW sheets	UAW sections	ANEC comments	ANEC's proposals
New actions	2 Competitive and resource-efficient transport system	<p>ANEC welcomes the EC objective to facilitate the flow, access and use of information in transport, in order to enhance efficiency and reduce costs of transport operations of importance to consumers. With pressure and need to reduce the traffic in cities, transport will become more multi-modal. Hence ANEC is participating in current standardisation activities in CEN/TC 278/WG 3 'Network Exchange NeTEX' which is working on a standard on combi-ticketing also valid for trains.</p> <p>With a view to achieve a sustainable and efficient transport system that reduces traffic congestion and pollution as well as increases safety, it is important the improvements in collective modes of transport include special focus to the quality of services⁴. The availability of information on travelling time and route alternatives is relevant to encourage seamless door-to-door mobility and increased use of sustainable modes of transport.</p>	The quality, accessibility and reliability of transport services has to be addressed in the future standardisation work in relation to EC Communication (2011) 144, (including clear information for users in relation to travelling times and route alternatives).
	5 Common chargers for mobile phones and other	We welcome the EC wish to issue a standardisation request for a common charger for mobile phones & other portable devices ("universal chargers"), based on the study published by DG ENTR/GROW. ANEC has been campaigning for a universal charger for many years now to	Add that Harmonised Standards for categories of products according to article 3.3 of the Directive and receiver performance for mobile telephones should be developed.

⁴ ANEC Services Research Study published in 2014 on [European cross-border travel and tourism - Learning from consumer experiences and complaints](#) gives a representative picture of the typical problems encountered by consumers when using transport services in Europe.



	portable devices	benefit both consumers and the environment. In addition, in line with the provisions of the RED Directive, Harmonised Standards for mobile phone antenna performance (art. 3.3), and conformity assessment with the essential requirements taking into account the reasonably foreseeable conditions of use (art.17) should be developed.	Add that Harmonised Standards on the conformity assessment with the essential requirements, taking into account the reasonably foreseeable conditions of use according to article 17 of the Directive, should be developed.
	6 Application of patients' rights in cross-border healthcare (Directive 2011/24/EU).	Interoperability of health systems across Europe has a role to play for consumers when accessing health care services in another country in the EU, e.g. for access to medical records by doctors and to reduce risks of errors. However, it is of crucial importance to ensure consumers have access to their own personal data and are aware (or can decide) who has access to the data and that its protection and security are guaranteed.	Give attention to key privacy management issues when dealing with cross border eHealth services in the framework of the Directive 2011/24/EU on the application of patients' rights in cross-border healthcare.
	9 Accessibility of public sector web-sites	The accessibility of digital products and services is of paramount importance to people with disabilities, and particularly to people with sight loss. With technology evolving rapidly, and an increasing number of platforms to access products and public services, there is urgent need to ensure interoperability and accessibility of these products and services for all users. Otherwise, the 'digital divide' will continue to increase. Free access to information on interoperability, and more effective standardisation, would greatly improve the provision of - and access to - digital products and (public) services. ANEC contributed to the development of EN 301549 and we agree that a revision of the standard/new standard is	



		needed once the draft directive on accessibility of public sector websites is needed.	
	10 Access to in-vehicle data	ANEC welcomes the initiative, however, personal data protection and privacy issues need to be considered when developing standards to support provision of in-vehicle data to third parties.	Give attention to personal data protection and privacy issues when developing standards to support provision of in-vehicle data to third parties.
	13 Ecodesign/Energy Labelling Directive	ANEC welcomes the work in support of the Regulations implementing the Eco-design directive in the areas of taps and shower products. As stressed in the ANEC/BEUC Fact sheet on water-using equipment , consumer organisations support common rules on shower heads and taps to enable all consumers to save water.	We expect standardisation to support Eco-design legislation in order to ensure the move to more-efficient water taps and showerheads comes with no extra upfront costs or aesthetic discomfort to consumers. Flow rate limits also need to be set in a way that does not reduce comfort.
	14, 15 Eco-design/Energy Labelling Directive	Should new standardisation requests be issued in support of the Regulations implementing the Eco-design directive, ANEC expects to continue collaboration with ECOS to ensure the representation of societal interests in future standardisation activities.	
	17 Clean Power for Transport Package	ANEC welcomed the Directive and will be involved in the work on the labelling of fuels of relevance to consumers (e.g. to compare economic efficiency (i.e. comparability of prices), availability, safety, durability of the engines using these fuels, environmental sustainability, full life cycle energy use of the fuel, impact on greenhouse gas emissions etc. Availability and interoperability of charging points for electric vehicles, as well as on board metering,	



		are crucial to the consumer uptake of electric vehicles. The present consumer preference is for electric bicycles, or personal light electric vehicles, as these are more affordable and easier to charge. In this context, ANEC would welcome the revision of the car labelling Directive 1999/94/EC which is long overdue.	
	18 Home compostable plastic packaging	<p>We welcome the intention to improve clarity around the definition of compostable and biodegradable plastic packaging in light of our position on the "European Strategy on Plastic Waste in the Environment" and the directive on reduction of plastic bags Directive (EU) 2015/720. ANEC believes that packaging standards need to reflect stricter requirements on the prevention of packaging and dangerous chemical substances, reuse, material recycling and thermal recovery.</p> <p>Directive (EU) 2015/720 states that the EC should ask CEN to develop a standard for home-compostable packaging and refers to oxo-degradable plastics.</p>	<p>Only materials that biodegrade in natural conditions are to be called biodegradable. Oxo-degradable plastics can contain polluting substances that do not degrade without causing environmental damage and yet can be referred to as biodegradable.</p> <p>These aspects are especially relevant to lessen the risk of consumer confusion about the composting properties of biodegradable & compostable plastic carrier bags.</p>
	26 Consumer ODR	ANEC welcomes the EC intention to request a study and possible standards on interoperability of on-line alternative dispute resolution systems. However it should not be forgotten that standards need to ensure these systems are accessible to all consumers.	Need to ensure that ODR standards cover accessibility requirements for consumers with disabilities.
	27 Food contact materials	With respect to standards in support of Regulation 1935/2004 on food contact materials, we draw attention to chapter 4.1 in the ANEC position paper 'Hazardous chemicals in products - The need for enhanced EU	



		<p>regulations' delineating a strategy to overcome deficits in legislation with respect to chemical safety requirements.</p> <p>The implementing measure on ceramics (Council Directive 84/500) needs to be updated as quickly as possible with a view to reducing the limits for cadmium and lead release and incorporating further elements.</p>	
	New items	Based on our comments below on the state of play of old actions, we suggest some new actions.	
State of play old actions	2.3 Eco-design/Energy Labelling Directive	As mentioned above (sections 14 and 15) we look with interest at the development of a revised mandate/request on resource efficiency of products. We count the mandate will require the mapping of a priority list of consumer products with key components for which material efficiency product specific requirements can be developed through standardisation.	
	2.5 Postal services	Although we note that there are no actions foreseen to implement the Communication for completing the single market for parcel delivery (COM (2013) 886), the Digital Single Market strategy refers to the Communication and to the launch of measures to improve efficiency, price transparency and enhancement of regulatory oversight of parcel delivery.	Clarification and updated information on the state of affairs regarding the single market for parcel delivery is needed.
	3.1.5	We repeat our proposal to elaborate standards on the interfaces with smart grid users, included in the Smart	Standards on the interfaces with smart grid users are needed in order to allow consumers to reap the benefits of smart energy systems.



	Smart grids and smart metering	Grids iteration mandate at the end of 2012 ⁵ . However, to our regret, little progress has been made since then.	
	3.1.5 Smart grids and smart metering/s mart cities	We believe a standardisation request/mandate is needed to develop standards on consumer requirements such as privacy, private data protection and accessibility. We are currently discussing it with the Smart & Sustainable Cities & Communities Coordination Group but with little progress so far.	We propose a standardisation request to draw up smart citizen related standards and requirements. These should include aspects related to accessibility and data protection & privacy, with reference to existing and planned standards activities, and highlight more general legal & ethical aspects needing further investigation.
	3.2.1 Role of European Standards as part of the regulatory framework	We welcome the intention to update and clarify guidance on standardisation mandates/requests. We presume this refers to the revision of the Vademecum to which ANEC contributed.	
	3.2.17 Wireless communications	This action is the opposite of what stated under section 5 of New Actions.	Please delete this section (3.2.17) as contradictory to section 5 of New Actions.
	3.2.22	Although the EC published a summary report, providing views and contributions of stakeholders on the Green Paper consultation on safety of tourism accommodation	It would be useful to update the state of affairs in this respect on the draft UAWP so as to allow stakeholders to comment.

⁵ ANEC-PT-2013-AHSMG-003rev



	Safety of specific services	(including ANEC contribution on consumer expectations), the considerations on the next steps have not been made public.	
	3.2.24 Accessibility	ANEC welcomes the wish of the EC to use standards in implementation of the future European Accessibility Act. We think EU harmonisation legislation ensuring the free movement of products should be extended to cover the accessibility of products, in order to provide a high level of consumer protection, and remove barriers both to consumers (e.g. obstacles to mobility) and traders (already done in the case of lifts, escalators, ramps).	
	3.3.4 Consumer ODR	This action is the opposite of what stated under section 26 of New Actions.	Please delete this section (3.3.4) as contradictory to section 26 of New Actions.
	3.3.5 Internet of Things	In the key policy area of the Internet of Things, ANEC thinks that a standardisation request/mandate is needed to address several item of consumer relevance.	ANEC proposes two aspects are taken into account in a standardisation request on IoT. The first is the anonymity maintenance with regards to all types of sensors including cameras. Indeed, the processing and analysis of sensing data can yield high levels of identifiability, and we believe there needs to be standards work to ensure that acceptable levels of anonymity are maintained when sensing data is processed. This element is also relevant to smart cities, and applies both in public space sensing and monitoring, and also to any sensing in the domestic environment (such as that used to sense power use by smart meters and smart grid technology). The second aspect is the



			activation intrusion control. Indeed, IoT capabilities allow automated or human controlled access to devices to take action (activation). An early example of this is the Smart Grid. However, the consumer needs to be able to control such activation of devices from 'outside' so as to avoid, for example, that the smart grid does not turn off and outside the consumer's control, a key piece of equipment that is needed for (for example) health reasons.
	3.3.6 Electronic signatures	The present standards on electronic signatures are not taking into account needs of consumers with disabilities (e.g.: interoperability with assistive technologies). We think a new standardisation request or an amendment of M/460 is needed to this effect.	New standardisation request or amendment of M/460 on electronic signatures is needed to take into account the needs of consumers with disabilities.
	3.3.7 Mobile payments	Mobile Payments is a policy area of rapidly evolving technology. However, we are concerned there is no attempt to ensure interoperability and accessibility of the security systems used in mobile payments, and in e-payments in general. Card, internet and mobile payment systems have features that make them inaccessible to people with disabilities, and particularly to blind and partially-sighted people. This is compounded by a lack of consistency across devices ⁶ .	Accessibility is a major gap within e- and m-payments and should be addressed urgently. This includes card security for online payments (accessibility of 3D secure and V.me by VISA); physical card payments (accessibility of PIN Entry Devices and information on payment card); and m-payment solutions (accessibility of mobile

⁶ More information is available in the EBU response to the European Commission consultation on the EC Green Paper 'Towards an Integrated European market for card, internet and mobile payments', April 2012, <http://www.euroblind.org/media/position-papers/EBU-Response-to-EC-Green-Paper-epayments-Final.doc>



			application and service). A standardisation request is needed to address these issues.
	3.3.8 Intelligent Transport System	ANEC welcomes the development of ITS standards and expects to contribute to their drafting. ANEC was first consulted in 2014 and submitted comments in support of the draft standardisation request last December. In our latest comments this year, we stressed the need for a proactive liaison between the ITS standardisation request and standardisation request M/530 on privacy & personal data protection management. ANEC also emphasised the importance of safety requirements and accessibility of public transport capabilities and information provision to be addressed by the standards.	
List of standardisation mandates/requests		We welcome the list of standardisation mandates & requests issued in line with our expectations of past years. However it would be useful to know which are still active and which are concluded or closed.	
Editorial Comments		It would be helpful to introduce an extra column 'Field' in the sheet on New Actions , in line with the columns used in the table "State of play old actions" in order to allow for easy identification of the relevant topics.	

About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment, 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 33 countries.

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



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