



*Raising standards for consumers*



## **POSITION PAPER**

# **Preliminary Draft Annual Union Work Programme on European Standardisation 2017**

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**Contact Person: Chiara Giovannini, Senior Manager**  
(Chiara.Giovannini@anec.eu)

## 1. Introduction

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This position paper expresses ANEC's preliminary views on the preliminary draft Annual Union Work Programme for European Standardisation for 2017.

As a member of the Committee on Standardisation (CoS), ANEC commented on the previous Union Work Programmes<sup>1</sup> 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 Standardisation and ICT priority plan for the Digital Single Market<sup>2</sup>.

The convergence of technologies and the digitalisation of society, businesses and public services blur the traditional separation between general standardisation and ICT standardisation. However, different legal and policy instruments exist to plan ICT standardisation and non-ICT standardization activities. Although we recognise the different histories and motivations, stakeholders wishing to contribute to EU standardisation policy are faced with several structures and planning frameworks, resulting in multiple discussions and risk of a fragmented approach. Noting there appears to be an intent in the JIES discussions for greater coherence, we invite the European Commission to address this issue further in the preparation of the Annual Union Work Programme for European Standardisation for 2017.

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

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### 2.1 Effective Participation of Annex III Organisations

ANEC understands the Commission intends to develop the AUWP further to include policy proposals as well as actions, as done in 2016.

Noting this and that actions of 2016 have for the most part still to be implemented, we reiterate the importance we attached to the action about the ESOs considering further measures to enhance effective participation of the Annex III Organisations, particularly in complementing the national delegation principle and so ensuring that

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<sup>1</sup> [ANEC position paper on draft EC Annual Union Workprogramme for Standardisation 2016](#)

<sup>2</sup> [ANEC position paper on Standards for the Digital Single Market \(reply to public consultation\), Dec.2015](#); [ANEC Position Paper on Draft Rolling Plan for ICT Standardisation 2016, August 2015](#)

European Standards are as robust as possible and have the broadest stakeholder support possible.

Although we accept CEN-CENELEC, especially through its Societal Stakeholders' Group, and ETSI are willing to consider the needs of Annex III Organisations, we believe these commitments should be underpinned by a formal proposal in the AUWP of 2017.

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:

- 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 sub-category of membership (in ETSI).

Separately, against the background of globalisation, we would like to stress again as we did it last year the importance for 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 Agreement<sup>3</sup> (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.

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

## **2.2 List of current standardisation mandates/requests**

In order to plan future work better, it would be useful to know which standardisation requests/mandates are still active and which are concluded or closed/repealed. This is especially important against the background of the recent entering into force/applicability of several new NLF Directives/regulations.

## 2.2 Specific comments

UAW sheets	UAW sections	ANEC comments	ANEC's proposals
<b>New actions</b>	N/A Internet of Things/digitalisation of consumer products	<p>The 'smartness or digitalisation' of consumer products and services is an increasing trend but so far few standards are reflecting it. The 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 stakeholder) requirements are properly addressed.</p> <p>Standardisation can play an important role in the uptake of IoT, by being a prerequisite for interoperability and ensuring consumers safety, personal data protection and accessibility.</p> <p>The proposed IoT Standardisation request should aim at evaluating which existing standards should be revised to cover the "smart/IoT" aspect, revising the relevant standards and/or developing new ones where needed.</p>	<p>ANEC suggests a standardisation request on the Internet of Things.</p> <p>The type of action is the development of standards.</p> <p>The Commission's priority is the Digital Single Market.</p>
	N/A Electronic signatures	<p>The present standards on electronic signatures are not taking into account needs of consumers with disabilities (e.g.: interoperability with assistive technologies).</p> <p>We think a new standardisation request or an amendment to M/460 is needed to this effect.</p>	<p>ANEC suggests a standardisation request (or amendment to M/460 on electronic signatures) to take into account the needs of consumers with disabilities.</p> <p>The type of action is the development of standards.</p> <p>The Commission's priority is the Digital Single Market.</p>



	<p>N/A Smart grids and smart metering</p>	<p>We repeat our proposal to elaborate standards on the interfaces with smart grid users, included in the Smart Grids iteration mandate at the end of 2012<sup>4</sup>. However, to our regret, little progress has been made since.</p>	<p>Standards on the interfaces with smart grid users are needed in order to allow consumers to reap the benefits of smart energy systems.</p> <p>The type of action is the development of standards.</p> <p>Some displays now in use do not meet ergonomic standards, so the information may not be presented in a way which is easy for all consumers to understand.</p> <p>The Commission's priority is the Digital Single Market and Energy Union.</p>
	<p>Demand Response</p>	<p>Concerning the proposed new and/or updated European standards on interoperability between grids and on compatibility with end-use appliances, we call attention to solve interoperability, in particular with Demand Side Flexibility. Specifically, we mean interoperability relating to data provided through the H1 interface and interoperability when systems are updated.</p> <p>The EC SGTF EG1 report<sup>5</sup> showed shortcoming in interoperability in smart metering systems. For instance, the scope of work so far was limited to the H1 and H2 interfaces, but it also needed to reflect the Internet of Things and Machine to Machine communications. Some interfaces have more than one standard so harmonization is needed.</p>	<p>Ensure interoperability requirements for consumers for the provision of energy services (including, but not limited to, functionalities A, B and F) and enable Demand Side Flexibility.</p>

<sup>4</sup> ANEC-PT-2013-AHSMG-003rev

<sup>5</sup> [EC Smart Grid Task Force EG1 report on the interoperability, standards and functionalities applied in the large scale roll-outs of smart metering in EU Member States](#)



		Further we note some of the standards developed (e.g. TC 205 standards) are not being used by Member States and awareness of these standards is low.	
	N/A Privacy of online services	<p>We believe a standardisation request/mandate is needed to develop standards on technical requirements for anonymisation techniques. These are applied to online privacy services to reduce the identifiability of consumers and citizens using e-Commerce or public online services (of hospitals, social care authorities, etc.) and the risk of excessive processing of personal data. Such standards would help European providers grow by using technological privacy safeguards for consumers ("privacy by design") to create a market for online privacy services.</p> <p>A particular aspect of online services to be looked at is public services in the context of Smart Cities. Standards on consumer requirements such as privacy, private data protection and accessibility of Smart Cities are missing.</p>	<p>We propose a standardisation request to develop technical requirements for anonymisation techniques applied to online (public and private) services.</p> <p>The type of action is the development of standards.</p> <p>The Commission's priority is the Digital Single Market. This issue is also linked with the Cybersecurity Strategy of the EU and the H2020 Digital Security Work Programme call (e.g., DS-1-2014 on innovation for viable online privacy business models) and Article 23 of the GDPR ("data protection by design and by default").</p>
	N/A Mobile payments	<p>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.</p>	<p>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 application and service). A standardisation request is needed to address these issues.</p> <p>The type of action is the development of standards.</p>



			The Commission's priority is the Digital Single Market.
	N/A eHealth /independent living solutions security	Standards are needed describing technical requirements for anonymisation techniques applied to Independent Living solutions to reduce the identifiability of older adults and other consumers and the risk of excessive processing of data related to consumers.  Such standards would help European providers grow by using technological privacy safeguards for consumers ("privacy by design") to add value to their solutions.	Standards are needed describing technical requirements for anonymisation techniques applied to Independent Living solutions to reduce the identifiability of older adults and other consumers and the risk of excessive processing of data related to consumers.  The type of action is the development of standards.  The Commission's priority is the eHealth Action Plan 2012-2020 - Innovative healthcare for the 21st century (COM(2012) 736)
	N/A Accessibility	We believe the AUWP 2017 should mention the possibility of a standardisation request to implement the EC proposal for a directive on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services. The proposal was published in December 2015 and the co-legislators are starting to examine it.	Standardisation request to implement the EC proposal for a directive on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services.  The type of action is the development of standards.  The legal basis is COM(2015) 615/2, 2105/0278 COD.
	1 (continuing from AUWP 2016)	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	The quality, accessibility and reliability of transport services has to be addressed in the future standardisation work in relation to EC





	Competitive and resource-efficient transport system	<p>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 services<sup>6</sup>. 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>	Communication (2011) 144, (including clear information for users in relation to travelling times and route alternatives).
	10 Access to in-vehicle data	ANEC welcomes the initiative but personal data protection and privacy issues need to be considered when developing standards to support provision of in-vehicle data to third parties.	Attention to be given to personal data protection and privacy issues when developing standards to support provision of in-vehicle data to third parties.

<sup>6</sup> 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.



	<p>17 Clean Power for Transport Package</p>	<p>ANEC welcomed the Directive and will be involved in the work 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.</p>	
	<p>New Activity 9 Developme nt of plastic biodegradab ility standards (including marine biodegradab ility; and compostabil ity/biodegra dability field tests</p>	<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. ANEC will in particular follow the work required by Directive (EU) 2015/720 on development of a standard for home-compostable packaging and refers to oxo-degradable plastics. Home compostable plastic packaging.</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 &amp; compostable plastic carrier bags.</p>



<p><b>2016 UWP</b></p>	<p>1 Accessibility of public sector web-sites</p>	<p>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.</p> <p>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.</p>	
	<p>22 Consumer ODR</p>	<p>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.</p>	<p>Ensure ODR standards cover accessibility requirements for consumers with disabilities.</p>
	<p>32 Lifts</p>	<p>ANEC welcomes the draft standardisation request to implement the new Lifts Directive and we have already submitted our comments on the draft.</p>	
	<p>2.3 Eco-design/Energy Labelling Directive</p>	<p>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</p>	



		product specific requirements can be developed through standardisation.	
	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.	
<b>Implementing Acts</b>	13  M/536 On implementation Radio Equipment Directive	ANEC must express concerns about the implementation of M/536 by CENELEC. The work has not started yet despite the new RED becoming applicable as of June this year. The issue blocking the development of the standards is linked to where and which EMF safety limits should be set. In our opinion, limits should not be set by standards as such but by legislation taking due account of existing opinions issued by the European Commission or its scientific committees, in line with the Vademecum on European Standardisation in support of Union Legislation and policies. It seems that	



		<p>CENELEC has a similar understanding but thinks that the limits should be set in the standardisation request.</p> <p>If amendment of the RED standardisation request is needed to this end, we urge the Commission to proceed to this revision as soon as possible. Should another way/instrument be identified, ANEC would be pleased to contribute to find a satisfactory solution.</p>	
	<p>20</p> <p>M/530 Privacy and personal data protection management</p>	<p>ANEC needs to express some concerns about the execution by CEN-CENELEC JWG 8 of M/530. For more than one year, discussions have been taken place on the work programme to respond to the request without any agreement being reached. In the last JWG internal ballot, the majority of the NSBs did respond to the ballot, showing a lack of interest in the issue. We think the right technical expertise is not available for the work which is of high relevance to consumers. We acknowledge the efforts being made by the Commission to solve the problems but we think that a clear decision should be taken on whether CEN-CENELEC are able and willing to carry out the work.</p>	

## About ANEC

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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.



***Raising standards for consumers***

**European association for the coordination  
of consumer representation in standardisation aisbl**

Avenue de Tervuren 32, box 27, B-1040 Brussels, Belgium  
Tel.: +32 2 743 24 70 / Fax: +32 2 706 54 30  
E-mail: [anec@anec.eu](mailto:anec@anec.eu)

EC Register of Interest Representatives:  
Identification number 507800799-30

**[www.anec.eu](http://www.anec.eu)**

<http://companies.to/anec/>



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