



POSITION PAPER on the EU Strategy on Standardisation

November 2022

Key points

- **Although there have been advances towards inclusiveness there is for sure still room for improvement** to ensure the effective representation of SMEs and societal stakeholders in standardisation. SBS support the strategy's call for the European Standards Organisations (ESOs) to put forward proposals to improve their governance by the end of 2022 and is working on concrete proposals together with the other Annex III organisations.
- Existing tools such as the **CEN-CENELEC Guide 17** Guidance for writing standards taking into account micro, small and medium-sized enterprises (SMEs) needs **or the SME Compatibility Test for standards also need to be further promoted**. This could be done by including on a systematic basis a **reference to these tools in standardisation requests**.
- **Increasing SME participation at the national level is essential to be able to shape European and international standards**. SBS supports the launch of a peer review process between Member States and national standards bodies to identify best practices and those areas where SME participation at the national level could be further improved.
- **The role of SME associations is key to bridge the gap between SMEs and standardisation** and represent the collective interests of SMEs. This is an important element that needs to be stressed. Standardisation bodies should be encouraged to further work with SME associations to ensure the representation of SME interests in their work.
- The EU and EFTA provide financial support for the participation of SMEs and other societal stakeholders in standardisation at the European and international levels. **Additional financial support should be provided at the national level for the participation of SMEs and SME associations**.
- **It is important SMEs are well represented in the High-Level Forum, its Sherpa sub-group and the other sub-groups** that may be created. SMEs and microenterprises face strong and diverse challenges in interacting with standardisation. It is therefore important their views, concerns and needs are well represented in the discussions of the High-level Forum and its subgroups.

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- The effective participation of European SMEs and societal stakeholders in international standardisation continues to be a major challenge. SBS supports the **use of existing fora with like-minded trade partners around the world to push the inclusiveness agenda at the international level**. The **European Standards Bodies should also strengthen the current cooperation agreements with their international counterparts from an inclusiveness point of view**.
- With a view to the upcoming negotiations on the final 2023 annual budget, SBS calls on the European Parliament and the Council to ensure that **the necessary resources are made available to match Europe's ambitions to become a global leader in the setting of standards**.
- There is a need to develop a **one-stop-shop to monitor and keep track of standardisation-related developments at the national, European and International levels**. Being able to identify those standards that are particularly relevant for SMEs is a prerequisite to be able to represent the interest of SMEs and to be further involved in standardisation.
- **Harmonised standards are extremely important for SMEs**. They heavily rely on their availability to show the conformity of their products with EU legislation, since using an alternative would often be too costly. **Stable and clear criteria for the assessment of harmonised standards are needed in addition to enough resources for their assessment and timely citation**.
- There is a need for the strategy to also **focus on the uptake and implementation of standards, especially among SMEs**. Funding and support schemes should be available to help SMEs to buy and access standards at special rates and help them with their implementation.
- There is a need to **integrate standardisation aspects** in existing curricula not only of universities but **also in vocational training and life-long learning**. National SME associations can also act as multipliers to support the dissemination of knowledge about standards among SMEs. The creation of **mentorship programmes** for new SME experts in standardisation could also be explored. Such efforts, especially at the national level, should receive **appropriate financial and organisational support** to ensure the best possible outcome.
- SBS has expressed concerns about the Commission's prerogative to develop **common technical specifications** as implementing acts included in recent proposals. We welcome the intention of the Commission to clarify the conditions and process under which such an approach would be followed. It is important **stakeholders, including SMEs, are consulted about this common approach and that Annex III organisations are consulted in the preparation of implementing acts laying down common technical specifications**.
- SBS **supports the targeted amendment to Regulation 1025/2012** on European Standardisation and believes there is **no need for additional amendments to the Regulation**. There is rather a **need to implement its provisions effectively**, especially those regarding stakeholder participation and access of SMEs to standards.

Background

On 2 February 2022, the European Commission published the Standardisation Strategy outlining a series of actions aimed at ensuring standards in support of a resilient, green and digital Single Market and EU's competitiveness. The strategy is part of a package including a report on the implementation of Regulation 1025/2012 on European Standardisation, a proposal for an amendment to the Regulation and the 2022 Annual Union Work Programme for European Standardisation.

The publication of the strategy was preceded by a consultation in the summer of 2021 to gather the views of the stakeholder community. SBS responded to the consultation with a [position paper](#) highlighting the key points to be considered to ensure the strategy would meet SMEs' needs. This position paper builds on the previous paper and includes SBS's views on the main initiatives outlined by the Standardisation Strategy, as well as proposals for further action.

Modernisation of the ESOs governance system

The strategy calls for the European Standards Organisations (ESOs) to put forward proposals to improve their governance by the end of 2022 to ensure better representation for SMEs, users of standards and other civil society stakeholders.

Although there have been considerable advances towards inclusiveness (especially within CEN and CENELEC), SME interests are still underrepresented and **there is room for improvement to ensure the effective participation of the stakeholders represented by Annex III organisations (ANEC, ECOS, ETUC and SBS) at the European level.**

In the case of ETSI, there is a need to attribute more rights to take Annex III organisations' input into account. This should be done, among other actions, by allowing Annex III organisations to comment directly on European standards under enquiry (instead of through the National Standards Bodies), ensuring their involvement in the governing bodies of ETSI (e.g., by reserving a seat for each of them in the Board) and dedicating sufficient financial and human resources to inclusiveness. SBS together with the other **Annex III organisations put forward its proposals for improving governance and inclusiveness** in a document submitted to the **ETSI General Assembly** in March 2022.

The Annex III organisations are also currently working on a **joint document outlining concrete suggestions regarding CEN and CENELEC governance**. In this respect, it is important to highlight that contrary to ANEC, ECOS and ETUC, **SBS does not have the right of opinion**¹ within CEN and CENELEC. Moreover, the right of appeal², this is the right to lodge a formal complaint against a decision taken by a CEN or CENELEC body is limited for all Annex III organisations. Annex III organisations could only launch an appeal to a decision taken or on a standard developed by a Technical Committee if they participated and contributed to the work of that Technical

¹ For further information on the right of opinion please check: <https://boss.cen.eu/reference-material/guidancedoc/pages/opinion/>

² See [CEN-CENELEC Internal Regulations Part 1](#) section 6 and Annex 4

Committee. SMEs have limited resources and cannot always identify relevant standardisation work at an early stage. **The right of appeal** is a last-resort tool that could help to guarantee the proper consideration of SMEs and other societal stakeholders' interests in the standardisation process.

This review at the governance level should be accompanied by technical and awareness-raising measures to facilitate the effective participation and contribution of Annex III organisations in standardisation work.

For example, CEN and CENELEC adopted a decision in January 2022 agreeing to provide Annex III organisations access to normative references. Normative references are references to other standards that are needed for the implementation of the specific standard being developed or revised. Access to normative references has been one of the difficulties repeatedly expressed by SBS experts concerning their effective participation in technical work. SBS welcomed this decision, but the necessary IT solutions must be implemented as soon as possible. This solution should also allow to access references of international standards developed by ISO and IEC and referenced in European standards. This CEN and CENELEC approach should also be reflected in the policies of the NSBs. Access to normative references also needs to be ensured to stakeholders participating in national mirror committees and those interested in contributing to standardisation by submitting comments on draft standards during Enquiry.

Finally, there is a need to further promote the use of existing tools such as the [CEN-CENELEC Guide 17](#) Guidance for writing standards taking into account micro, small and medium-sized enterprises (SMEs) needs or the [SME Compatibility Test for standards](#) developed by SBS to ensure SME needs are considered in standards. The use of these tools could also be further promoted by **including on a systematic basis a reference to these tools in standardisation requests.**

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Peer review at the national level

Increasing further SME participation at the national level is essential to increase the SME influence in the development of European and international standards. Some National Standards Bodies (NSBs) already have in place measures to facilitate the access of SMEs to the standardisation work such as free access to national mirror committees, reduced fees when buying standards, dedicated services and contact points or online platforms to contribute to drafts under Enquiry. Nevertheless, these and other SME supporting measures are not implemented in all countries and it is important to share best practices and to identify those areas where SME participation at the national level could be further improved.

SBS, therefore, supports the proposal to initiate a peer review process amongst Member States and NSBs by the end of 2022 to achieve better inclusiveness and SME-friendly conditions for standardisation. In this context, SBS has also launched a questionnaire to national SME associations on their involvement in standardisation and their relationship with their NSB(s). The aim is to identify additional best practices and to gather further information on the access to standards, the involvement of SMEs at the national level as well as the support offered to SMEs by the NSBs and the national governments in relation to standardisation. The outcome will be used to feed into the peer review process.

The role of SME associations is key to bridge the gap between SMEs and standardisation and represent the collective interests of SMEs both in specific sectors and on horizontal issues. This is confirmed by a 2021 study on the function and effects of European standards commissioned by the European Commission³. SMEs tend to rely more than large companies on business associations to represent their interest in standardisation. **Standardisation bodies should therefore be encouraged to further work with SME associations to ensure the representation of SME interests in their standardisation work.**

An important obstacle to the participation of SMEs is the availability of resources. At the European level, the EU and EFTA are providing financial support through SBS for the participation and representation of SMEs in European and International standardisation. This allows for the participation of around 65 European experts in more than 80 Technical Committees (TCs) every year. This is a small number considering there are around 500 active European TCs in CEN, CENELEC and ETSI and that the active work items linked to Commission Standardisation Requests alone (excluding non-mandated and work items at the international level), were over 900 in 2021⁴. **It is therefore important additional financial support for the participation of SMEs and SME associations is provided at the national level.**

High- level Forum and excellence hub

SBS welcomes the creation of a High-Level Forum on standardisation and believes it can help provide better coordination of the European position at the international level and more inclusiveness and transparency in setting the priorities and needs regarding standardisation work.

From the perspective of SBS **it is important SMEs are well represented in the High-Level Forum, the “Sherpa sub-group”, that will do all the technical preparatory work for endorsement by the Forum, and in the other sub-groups that may be created.** SMEs represent 99.8% of all businesses in Europe and play a key role in achieving the EU economic resilience and digital and green transition goals. They are potentially the biggest user of standards. However, SMEs and microenterprises face strong and diverse challenges in interacting with standardisation. It is therefore important their views, concerns and needs are well represented in the discussions of the High-level Forum and its subgroups.

SBS also welcomes the establishment of the excellence hub for standards, the creation of the Chief Standardisation Officer and the appointment of Maive Rute to this position to enhance coordination on standardisation matters within the European Commission.

European leadership and SME representation in international standardisation

SBS supports the ambition outlined in the strategy to reinforce Europe’s role in global standardisation as a “standards-setter rather than standards-taker”. The dominant position taken in recent years by China and other countries in international standardisation could potentially put European companies, and particularly SMEs, at

³Study on the functions and effects of European standards and standardisation in the EU and EFTA Member States <https://ec.europa.eu/docsroom/documents/50114>

⁴ [Final Report-Study to identify Key areas of standardisation for SMEs](#) (page 16)

a disadvantage. In this context, SBS supports the proposals to use the High-level Forum and the excellence hub to ensure strategic coordination between the different European stakeholders and ensure that international standards meet European needs and values.

However, this ambition needs to be pursued in a fair and inclusive way. **The effective participation of European SMEs and societal stakeholders in international standardisation continues to be a major challenge.** Participation at the international level implies additional resources due to, for example, the additional cost and time required for international travel. As mentioned, SMEs rely on associations such as SBS more than larger companies to represent their interests in standardisation. This is even more the case the further we move from the national level.

The conditions to participate in the development of international standards are different from the European ones, especially concerning access for Annex III organisations such as SBS. At ISO and IEC, to get access to documents and fully participate in Technical Committee and Working Groups meetings, a liaison agreement needs to be set up. This procedure takes several months, often more than 6 months, and depends on the positive vote of the members of the Technical Committee. As a result, SBS may lose the opportunity to bring into the discussion the European SME perspective and to contribute to key phases of the development of a standard. Moreover, there is a **need to improve the dissemination and availability of information on proposals for the creation of new fields of activity at the international level.**

SBS supports the **use of existing fora with like-minded trade partners around the world to push the inclusiveness agenda at the international level.** Particularly relevant are the recent developments in the EU-US Trade and Technology Council (TTC) and the discussions within its Working Group 1 on Technology Standards around the need to build shared support towards greater inclusiveness to rebalance the influence and interests in international standardisation. Nevertheless, there is also the need to discuss and agree on more incisive measures, particularly concerning the involvement of SMEs at the international level. In this context, the **European Standards Bodies should also consider whether the current cooperation agreements with their international counterparts could be strengthened from an inclusiveness point of view**, e.g., by allowing automatic access to Annex III organisations and the European Commission to international TCs leading the work of common European and international standards.

Finally, it is important to point out that this renewed effort towards considering the European standardisation system as a strategic asset, **needs to be tangibly supported by resources in line with the stated ambitions.** While SBS appreciates the increase in the budget line for European standardisation included in the Commission draft 2023 budget, it is worrying to see that this increase is almost entirely rolled back in the budget position put forward by the Council. With a view to the upcoming negotiations on the final 2023 annual budget, SBS **calls on the European Parliament and the Council to ensure that the necessary resources are made available to match Europe's ambitions to become a global leader in the setting of standards.**

Improving access to information on standardisation developments

The number of standards developed or revised each year is constantly increasing. Considering the variety of sectors in which SMEs are involved and the increasing number of standards, **it is important to develop efficient tools for the monitoring of standards**. Being able to identify those standards that are particularly relevant for SMEs is a prerequisite to be able to represent the interest of SMEs and to be further involved in standardisation.

The standardisation strategy recognises the need to monitor standardisation developments at the international level and refers to an EU standards-monitoring website. Nevertheless, what is necessary from the perspective of SMEs is a **one-stop-shop to monitor and keep track of standardisation-related developments at the national, European and International levels**. There is a lot of information available online (new work items, work items under Enquiry, under Formal vote, etc.). This overflow of information without filtering or being structured in an easy way leads to a de facto lack of information amongst SMEs. Currently, there are some projects at the national level, e.g., led by DIN in Germany, to develop tools to facilitate the monitoring of standardisation developments relevant to SMEs in a sector. SBS is also working on a monitoring system that could help to provide relevant information to SMEs in a more structured way. **The deployment of these or similar projects on a wider scale should be further considered**.

Accelerate the development and support the uptake of standards

Standards are important enablers in achieving resilience and the green and digital transition goals. Moreover, **harmonised standards are extremely important for SMEs**. To be able to keep their competitiveness and scale-up, SMEs need up-to-date standards that allow them to benefit from the presumption of conformity with EU legal requirements. SMEs normally have more limited financial and other resources than larger companies. Therefore, they heavily rely on the availability of standards to show the conformity of their products with EU legislation, since using an alternative to standards would often be too costly for them.

SBS welcomes the goal of the strategy to ensure the timely delivery of standards and their citation in the Official Journal. It also welcomes the work done under the Joint Task Force between the Commission and the ESOs. It is important though that information on the progress within the Task Force is shared with all stakeholders on regularly. **Stable and clear criteria for the assessment of harmonised standards are needed but also that enough resources are put in place for the assessment of candidate harmonised standards** (so-called HAS consultants) to ensure the process works smoothly. To this respect, it is to be regretted that the gap between the previous and the current HAS contracts has led to a backlog in the citation of standards. The Commission and the ESOs should put all necessary mechanisms in place to deal with this backlog as soon as possible and ensure that this situation does not repeat in the future.

Moreover, regarding standards in support of the twin transition, we especially welcome the aim of the strategy to have as a starting point a review of existing standards. From the point of view of SMEs, **it is important to avoid the proliferation of standards**. When new topics emerge, there is a tendency to immediately create or request a new standard. Sometimes there are gaps and new standards are needed but whenever possible we should rather look at adapting existing standards to, for example, include circular economy principles, rather

than creating new ones. It is not always easy for SMEs to have an overview of all relevant existing standards. This aspect must be carefully considered both when the Commission issues standardisation requests to the European Standards Organisations and during the development of standards by Technical Committees.

Finally, **an element missing** from our perspective in the strategy is **a focus on the uptake and implementation of standards, especially among SMEs**. The use of complex standards remains a challenge for SMEs, which hinder their ability to competitively provide their services. This is especially important concerning the use of new technologies. Most SMEs need assistance and training on the application of standards and adapting those to their specific needs. As most SMEs suffer from limited resources, they need adapted instructions and practical guides to help with their implementation. Funding and support schemes should be available to help SMEs to buy and access standards at special rates and help them with their implementation. SME associations also have a role to play in this context.

Education and training on standardisation

SMEs are often unaware, or at least insufficiently aware of standards and their possible benefits of standardisation. They do not always know which standards exist, how they would benefit from them or how to find out more. Training programmes should help SMEs to understand the role of standards and their benefits regarding issues such as market access, risk management, the adoption of new technologies or innovation. These training programmes need to have a practical orientation. Training materials are available, but these are not always tailored to SMEs and there is no single point where all resources are available and structured in a coherent way. **There is also a need to integrate standardisation aspects in existing curricula not only of universities but also in vocational training and life-long learning.**

National SME associations can act as multipliers to support the dissemination of knowledge about standards among SMEs. This is the reason why it is important to develop **training and capacity building programmes** directed to them. **The creation of mentorship programmes** between more experienced and less experienced SME standardisation experts in cooperation with the National Standards Organisations and SME associations could also be a way to increase knowledge and SME representation in standardisation at all levels.

These programmes should receive appropriate financial and organisational support to ensure that the perspective and expertise of SMEs have an increasingly stronger role in standardisation.

Common technical specifications

SBS has expressed concerns regarding the prerogative claimed by the Commission in recent legislative proposals such as the AI Act or the Machinery Regulation to establish common technical specifications via implementing acts. Although there may be a need to have a backstop measure to do so in case standards are not available, SBS believes that this should always be a last resort measure and subject to stakeholders' involvement, including SMEs, in the drafting process and only be brought forward in the event of a prolonged absence of standards and consequent negative repercussions on the market.

SBS welcomes the intention announced in the strategy to develop a horizontal approach to the development of common technical specifications in terms of criteria and processes. Nevertheless, it is important that stakeholders, including SMEs, are consulted and involved in the discussions concerning this common approach. SBS also believes that in line with the inclusiveness principle of the Standardisation Regulation, of Annex III organisations need to be consulted when preparing implementing acts laying down common technical specifications.

Technical amendment to Regulation 1025/2012 and its evaluation

SBS supports the targeted amendment to Regulation 1025/2012 proposed by the Commission within the framework of the Standardisation Strategy⁵. In the opinion of SBS, this should be combined with specific actions to support further participation of SMEs and other stakeholders at the national level. This is also essential to be able to ensure a balanced representation at the European and International levels.

According to the strategy, the Commission will launch an evaluation of Regulation 1025/2012 before the end of 2022. SBS supports the Regulation and believes there is no need for additional amendments to the main provisions of the Regulation. There is rather the need to implement them effectively, for example in relation to articles 5 and 6 on stakeholder participation and access of SMEs to standards. SBS is looking forward to contributing to the evaluation and providing its views and feedback in this context.

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Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

Co-financed by the European Union and EFTA



⁵ See [SBS comments on the amendment to Regulation 1025/2012](#)