



POSITION PAPER

SBS comments on the future Standardisation Strategy

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Key points

- The Standardisation Strategy should aim at **improving the system for the development, assessment, and citation of harmonised standards**. The blocking factors for the citation of harmonised standards should be solved by defining clear roles for all actors within the standardisation system and criteria for the assessment of harmonised standards. Future needs for standardisation should also be better anticipated.
- **The improvement of inclusiveness at national, European and international levels should also be addressed**. Although there have been considerable advances towards inclusiveness there is still room for improvement to ensure effective participation of stakeholders and Annex III organisations at the European level. Inclusiveness at the international level remains an important challenge that should be addressed since European standards are increasingly being developed at the international level.
- Rather than looking for alternatives to the existing system, **the European Commission should continue supporting the capacity building in the ESOs to deliver more home-grown standards**.
- **The European Commission should support the development of 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 ambition to increase the European influence in international standardisation should also be accompanied by the necessary resources**. A system for coordination among the different national and European stakeholders should also be put in place. Already existing European SME networks, such as the one provided by Small Business Standards (SBS) should also be used.

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- SME friendly standards are essential for a successful twin transition. **The Commission should help to promote existing tools to achieve this objective, such as the *CEN-CENELEC Guide 17* or the *SME Compatibility Test for standards* developed by SBS.**
- **The future strategy should also focus on the uptake of standards and not only on the pre-normative and standards development phases.** Funding and support schemes should be available to help SMEs with the implementation of standards. SMEs associations, such as SBS are also well placed to support the development of practical guides supporting the implementation of standards. The availability of standards in the national language and special favourable pricing schemes for SMEs are also important to this respect.
- From the perspective of SBS, **there is no need to revise the Standardisation Regulation (1025/2012).** There is rather the need to implement its provisions effectively.

Background

The [Communication on an updated Industrial Strategy](#) presented by the Commission in May 2021, included as one of its key actions the development of a Standardisation Strategy for the third quarter of 2021. The Commission has also recently published a [roadmap](#) asking for feedback on the future Standardisation Strategy to stakeholders.

Small and medium-sized enterprises (SMEs) can significantly contribute to achieving the EU economic recovery and digital and green transition goals outlined in the above-mentioned Communication. SMEs represent most of all EU businesses and are essential to ensuring economic growth, innovation, and job creation in Europe. But to do so, it is essential that the right environment, also concerning standardisation, is created. Therefore, it is key that the interests and needs of SMEs are fully considered in the future Standardisation Strategy.

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Improving the development, assessment, and citation of harmonised standards

The roadmap points out that the main goal of the future Standardisation Strategy is to consolidate and improve the European standardisation system. In this context, one of the most important aspects the strategy will need to focus on is the improvement of the system for the development, assessment, and citation of harmonised standards. This is essential for the well-functioning of the Single Market, Europe's recovery and competitiveness. Timely delivery of standards is also fundamental if Europe is to reach the objectives it has set in relation to the green and digital transitions.

Harmonised standards are extremely important, especially 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.

In recent years, major issues have emerged linked to the assessments of harmonised standards and their referencing in the Official Journal of the EU (OJEU). While the situation varies from sector to sector, major concerns are particularly prevalent in some areas such as in the construction sector, notably following the decisions of the James Elliott court case (ECJ, C-613/14). This situation has led to a slowdown and, in some cases, a stop in the technical work of some Technical Committees within the European Standards Organisations (ESOs) and the citation of harmonized standards. **The effective implementation of the standardisation strategy requires that the blocking factors of the harmonised standards citation are resolved, and regulatory certainty is re-established.** To achieve this, it is important that:

- **All actors-** European Commission, European Standardisation Organisations, industry and all other stakeholders- **within the European standardisation system work together to ensure there is a common understanding of the role of each of them.** The setting up of the joint task force between the Commission and the European Standardisation Organisations is a step in the right direction.
- **The standardisation strategy confirms and reinforces the New Approach/New Legislative Framework (NLF).** This approach has been central to the achievement of the Single Market and to the provision of a flexible framework allowing to cope with technological developments.
- **Clear objectives for the timely delivery and citation of standards are specified and measured.** This should help to evaluate progress and identify areas for improvement.
- **Clear and stable criteria for the evaluation of harmonised standards are developed so that delays in their development and subsequent citation are avoided.** While we acknowledge the Commission has certain responsibility and a role to play in relation to initiating and checking that harmonised standards are fit for purpose, there must be a stable and clear criteria against which the standards are assessed. It is also important that there is a common understanding and harmonised views on these criteria from all the relevant stakeholders: experts, Harmonised Standards (HaS) consultants and Commission desk officers.
- It is also important to **better anticipate future standardisation needs** to support the competitiveness of our companies at the European and international levels. This should also include possible new standards related to new legislative proposals. In this respect, it is also important to keep SME needs in mind.

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Increasing inclusiveness at the national, European and international level

Inclusiveness is a key principle of Regulation 1025/2012 and the European Standardisation system. SMEs represent the core of Europe's economy and are potentially the biggest user of standards, it is, therefore, essential to ensure they are around the table when developing standards. Nevertheless, SMEs and especially micro-enterprises cannot always play a leading role in developing standards and may find it difficult to get involved in standardisation processes. This is due to many factors such as lack of awareness

or lack of resources (technical, financial, language...).

Although there have been considerable advances towards inclusiveness (especially in the case of CEN and CENELEC) there is still room for improvement. Moreover, European standards are increasingly being developed at the international level, which represents an additional challenge for the participation of SMEs. **The future strategy should propose actions to improve the *de facto* inclusiveness**, by ensuring solid support to the further enhanced participation of SMEs in the standardisation process at the European and international level.

Increasing further SME participation at the national level is essential to be able to shape European and international standards. The role of professional organisations is key to bridge the gap between SMEs and standardisation and represent the collective interests of SMEs in a specific sector. **SBS through its members has been very active in trying to raise awareness and encouraging participation at the national level** through, for example, the organisation of national seminars. Some National Standards Organisations already have in place measures to facilitate the access of SMEs to the standardisation work, and it is important to share best practices in this regard through for example the CEN-CENELEC SME Working Group. In addition to the lack of awareness, another important obstacle to the participation of SMEs is the availability of resources. To this respect, national governments support for the participation of SMEs and SME associations in national standardisation is key, for example, by providing financial support.

At the European level, **there is a need for the ESOs to evaluate their internal regulations and current practices to further ensure the effective participation of all stakeholders including Annex III organisations.**

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ETSI has set up the 3SI programme as a vehicle to implement and promote inclusiveness. The **3SI programme should drive forward inclusiveness through concrete proposals**, for example, to **anchor the programme in ETSI directives and attribute more rights to take Annex III organisations' input into account** (i.e., the right to directly comment on European Standards under Enquiry instead of commenting through the National Standards Organisations). To implement inclusiveness-related issues, there is however a need for concrete projects or concrete activities (workshops, events, trainings, etc.), so that ETSI could truly reach out and provide services to a larger SME community. ETSI has so far not dedicated substantial resources and budget to increase its inclusiveness. Therefore, the European Commission should consider tying future funding to concrete achievements around inclusiveness.

Regarding CEN and CENELEC some areas could be looked at to further improve and ensure the effective participation of SMEs in standardisation work. For example, **experts participating in technical bodies drafting standards do not always have automatic access to the normative references used in the standard under development.** This situation may also apply to any organisation or SME wishing to submit comments during the Enquiry at the national level. Purchasing the normative references is very costly and not having access to these external standards makes it often difficult to fully understand the content of the standard and effectively participate in the process. This is a problem that is faced by SBS experts during their work in Technical Committees and Working Groups.

Moreover, although SBS as a partner organisation can participate in the governing bodies of CEN and

CENELEC and submit comments on proposals, comments from Annex III organisations are just made available to all the National Standards Bodies once the vote has already been cast (e.g. on the creation of a new Technical Committee, on the adoption of international standards in the case of no corresponding European Technical Committee). **Further consideration should be given to reinforcing the rules around the consultation of weaker stakeholders so that their opinions are duly considered in the process.**

Effective participation in standardisation work at the international level continues to be a major challenge. The conditions to participate in the development of international standards are different from the European ones, especially concerning access for Annex III organisations. 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 and depends on the positive vote of the members of the Technical Committee. As a result, SBS may lose the opportunity to contribute to key phases of the development of the standard. Moreover, contrary to the European level SBS cannot participate in the governing bodies of ISO and IEC and is not always aware of new proposals for new fields of standardisation. To improve the situation, we propose to:

- **Improve the availability of information. Information on proposals for the creation of new Technical Committees should be made available on the ISO and IEC website** in the same way they publish other information (e.g. [ISO update](#)). This could help SMEs and other stakeholders to flag new initiatives and proactively contact their National Standards Bodies and get involved in the process from the beginning.
- **Evaluate the possibility to simplify the procedures related to liaisons in technical committees.** If an organisation already has a liaison with a Technical Committee and has passed the pre-screening from the ISO/IEC Central Secretariat access should be granted automatically.
- **Designate a specific person within ISO and IEC** (preferably at the level of the governing bodies) **dedicated to champion** the participation of SMEs and societal stakeholders in the standards development process and act as a facilitator of inclusiveness.

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Finally, **Standardisation organisations** at the national, European, and international levels **should make the most of digital technologies beyond the COVID -19 crisis to facilitate participation in meetings and support the use of online authoring systems.** Digital solutions may potentially help further the involvement of SMEs by facilitating their participation in the standards development process. Although physical meetings continue to be important and have many advantages, online meetings have removed several major thresholds for SME participation, including the cost and time required for travelling, which can be rather important especially in relation to international standardisation. It is important to find the right balance between the number and format of meetings to facilitate the participation of all stakeholders.

Finally, there is also a need to **enhance the participation of Annex III organisations in the strategic discussions related to standardisation and the European standardisation system taking place between the European Commission and the ESOs.**

Improving access to information and monitoring of standardisation work

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.**

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. **The European Commission should support the development of a similar monitoring system at the European level, in collaboration with the ESOs, as a one-stop shop for the monitoring of standardisation related developments.**

The monitoring of developments at the international level is even more challenging. This system should, if feasible, ideally be extended to the international level. **Ensuring access to the right information at the right time about developments at the international level is essential for safeguarding European SME interest in international standards.**

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Increasing European influence in international standardisation

The Commission Roadmap refers to the need for coordination of European stakeholders and available resources to ensure that international standards meet European needs and values. SBS agrees with the need to have a more strategic approach to ensure the influence of European stakeholders at the international level. Nevertheless, **the ambition to increase the European influence in international standardisation should also be accompanied by the necessary resources.** Participation at the international level implies additional resources due to, for example, the additional cost and time required for international travel. As a result, the participation of European stakeholders and SMEs is insufficient at the international level. **It is therefore essential that the European Commission provides additional financial support to ensure the representation of SMEs at the international level.**

But **as important as the availability of resources it is the need to ensure appropriate coordination between the different national and European stakeholders.** There is a need for overarching strategic coordination among Europe's industrial stakeholders and with the different governments. **The European Commission could evaluate the appropriateness of using existing structures,** such as the Committee on Standards or the European Multi-Stakeholder Platform on ICT Standardisation, **or of creating a new one to ensure coordination at the European level. Regarding SMEs, it is important to use already existing networks, such as the one provided by SBS and its members, to understand the European SME needs and**

interests, setting goals and agree on strategies on how to achieve those goals within international Standards Developing Organisations (SDOs).

Developing SME compatible standards in support of the twin transition

Standards will be essential to support the uptake of new digital technologies and more sustainable products. **Access to data is a key element for SMEs. Standards should ensure interoperability and that access to data is technically possible.** Standardised data formats and interfaces that ensure access to data are a precondition to enable faster innovation by independent companies, in particular SMEs and start-ups. Ensuring connectivity between different systems is also essential to SMEs. Interoperability-by-design offers the possibility to connect systems from different providers, which is crucial for platforms in many industries, such as the automotive or energy sectors. Interoperability and the development of open standards (in contrast with proprietary solutions) are also a safeguard against vendor lock-in. **The development of standards to ensure interoperability contributes to an important industrial objective that is a free and sovereign ICT sector,** by which Europe can grow its own innovation champions to counter vertically integrated big players.

Access to data and information is also essential in the context of a more sustainable and circular economy. This is important so that we do not have obstacles to repair, refurbishment and upgrading for independent suppliers and service providers. Only if independent companies that perform repair and maintenance services have access to the products' data, we can have a competitive secondary market, where many SMEs can thrive and drive economic growth and employment, with consumers spending less, and products' lifecycles extended. It is important to keep this aspect in mind when developing standards to ensure that they enable, rather than hamper the sharing of information.

But to achieve the digital and green transition, **it is also essential that standards are written with SMEs in mind because it will not be possible to have a successful recovery and twin transition without them.** The European Commission must encourage the SDOs to develop **standards that are SME compatible in terms of content and fair costs** and that support 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](#) recently published by SBS. Making standards more SME-compatible can only lead to better uptake of standards amongst smaller businesses.

Finally, **from the point of view of SMEs, it is important to avoid the proliferation of standards.** When new topics emerge, e.g., circular economy, sometimes there is a tendency to immediately create new standards. It is not always easy for SMEs to have an overview of what exists and what standards can be used. **Sometimes there are gaps and new standards are needed but sometimes the right standard already exists and/or there is just the need to adapt existing standards to consider these new aspects rather than creating new ones.** This aspect must be carefully considered both when issuing Standardisation Request to the ESOs and during the development of standards by Technical Committees.

Cooperation with fora and consortia

In the last years, there has been an increase in the number of fora and consortia developing specifications outside the European standardisation system, especially in some sectors characterised by rapid technological developments such as ICT. There is a risk that this model may be extended to other areas in the future.

For SMEs, it is not easy to have an overview of all standardisation activities and what already exists and what standards can be used. Moreover, while the European Standardisation system needs to operate within the framework of a clear set of principles established by Regulation 1025/2012 such as openness, inclusiveness, consensus and transparency, this framework does not apply to specifications developed in fora or consortia. **Extending this model to other areas may lead to increased difficulty in raising awareness and involving SMEs in the development of standards due to the more limited resources available to SMEs.**

Rather than looking for alternatives to the existing system, the European Commission should continue supporting the capacity building in the ESOs to deliver more home-grown standards. The ESOs have also put in place mechanisms to cooperate with existing fora and consortia (e.g. oneM2M) and in this way respond to emerging needs. These efforts should continue. Only in exceptional and duly justified cases, recognition of standards developed by fora and consortia may take place and as long as there is proof that European and SME and other interests were duly taken on board.

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Supporting the implementation of standards

The roadmap highlights the need for action in relation to the pre-standardisation activities. From the point of view of SBS, the future strategy should also focus on the uptake 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 the implementation of standards. **Funding and support schemes should be available to help SMEs with the implementation of standards. SMEs associations, such as SBS are also well placed to support the development of such guides** as they have already done for example on the [ISO 26000 standard on social responsibility](#), the [ISO/IEC 27001 standard on IT security management](#) or the recent [Guide on Industrial Internet of Things](#).

In this context, it is also important to consider the cost of acquiring the standard (when they are not available for free as in the case of ETSI). **This is not only related to the cost of the standard itself but also the cost of all the normative references included in the standard.** For example, it has been estimated that the cost of buying the normative references in EN 81-20 amounts to approximately € 5,000 in addition to

the cost of buying the standard itself. It is important to develop pricing schemes that provide special more favourable conditions for SMEs.

Furthermore, being able to access documents and standards in their language is an important aspect for SMEs to be able to benefit from them and participate in the process. In some countries for reasons of simplification and speeding up the process of making the documents available once adopted, National Standards Bodies (e.g., in France) are considering limiting themselves in the future to a partial translation of the documents into the national language. This is a source of concern. The further development of machine-readable standards and automated machine translation systems can help to **develop improved tools for the translation of standards for SMEs.** The development of such tools should be supported by the European Commission.

Implementation of Regulation 1025/2012

According to the roadmap, the Commission will assess whether amendments to the Standardisation Regulation are required. SBS supports the Regulation and believes **there is no need to amend 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.

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.

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