



IMCO Committee amendments to the Own Initiative Draft Report on the Standardisation Strategy

February 2023

This paper provides an overview of the Small Business Standards (SBS) views regarding the amendments proposed to the [draft own initiative report](#) on the Standardisation Strategy currently under consideration in the IMCO Committee.

General remarks

On **Paragraph 1**, SBS supports amendments 19, 20 and 21, which highlight the insufficient focus in the standardisation strategy on the uptake and implementation of standards, particularly by SMEs.

On **Paragraph 2**, SBS supports amendment 28, reiterating the importance of ensuring that the needs and specificities of all relevant stakeholders, including SMEs, are considered in the European standardisation process.

On **Paragraph 3**, SBS is in favour of amendment 40, which calls for the future annual standardisation dashboard to put into practice measures to easily allow all stakeholders to monitor, follow and contribute to standardisation work in their areas of interest.

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Leveraging the European standardisation system

On **Paragraph 11**, SBS sees positive aspects in amendment 76, which highlights the potential positive effect of focusing on the **uptake of existing standards**, in terms of more thorough implementation and a timelier delivery of standards. SBS also supports amendments 77, 80 and 84, calling for clear and stable criteria for the assessment of harmonised standards and for the provision of the necessary resources to ensure a timely assessment and citation. SBS believes that the aforementioned amendments **should be consolidated into a corresponding compromise amendment**.

SBS strongly supports amendment 83, **adding a new section to paragraph 11**, stressing the **importance of avoiding an excessive proliferation of standards** and underlining the importance of supporting the uptake and use of standards among SMEs.

Upholding the integrity, inclusiveness and accessibility of the European standardisation system

On **paragraph 12**, SBS strongly supports amendment 87, which offers **concrete, directly applicable measures** to

increase the level of inclusiveness and involvement of all stakeholders in **standardisation at national and European level**. SBS also views with favour amendment 88, although it lacks the inclusion of more tangible provisions.

As a **new section to be added to Paragraph 12**, SBS strongly supports amendment 96, which highlights the **need for an increased role of SMEs in the standardisation process, particularly at international level**, and calls for the **necessary resources to be provided** to achieve this goal. SBS also sees positive elements in amendment 97, but suggests that its provisions in terms of calling for funding and resources are improved by extending them to all relevant stakeholders and not only consumer groups.

On **paragraph 13**, a number of positive points are made (in amendments 100 and 101, inter alia) regarding measures to increase the role of SMEs and societal stakeholders at the national level. SBS reiterates that **the peer-review** process announced by the European Commission within the framework of the standardisation strategy would be an excellent occasion to **identify, share and implement relevant best practices** that already exist in different Member States. In this sense, **SBS supports amendment 122**.

Regarding **new sections to be added to paragraph 13**, SBS is strongly in favour of amendments 104, 105 and 106, which outline positive, concrete measures that could be implemented to strengthen the role of SMEs and other societal stakeholders at the national level. **SBS believes that the provisions of these amendments should be consolidated into a corresponding compromise amendment**.

On **paragraph 14**, SBS echoes the concerns expressed in amendments 107 et al. regarding the need for a consistent approach of the issue of common specifications and the inherent risk that different legislative processes may lead to diverging provisions on this matter. **SBS also reiterates that any process started by the Commission regarding future common specifications must be fully transparent and involve all relevant stakeholders in their drafting**.

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Setting international standards

SBS strongly supports amendment 126, which creates a **new section under paragraph 16**, providing **strong, concrete measures** to enhance the role and inclusion of Annex III organisations in **international standardisation**. In the same direction, SBS also supports amendments 134 and 136, which propose to create a **new section under paragraph 17**.

Ensuring future standardisation expertise

On **paragraph 19**, SBS supports amendment 150, which calls for an expansion of **pathways towards stronger standardisation expertise** also to lifelong learning and vocational education and training. **SBS reiterates** that it would be extremely valuable to **launch mentorship and training programmes aimed at raising awareness on the benefits of standardisation**, particularly towards **SMEs and other under-represented stakeholders**.

Contact

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