

ANEC Strategy 2014 to 2020 Annual Action Plan 2015

I. Introduction

In June 2013, the ANEC General Assembly adopted the ANEC Strategy 2014 to 2020, comprising a Vision and Mission supported by ten Strategic Objectives¹.

As indicated during the development of the Strategy, including during its public consultation phase, the actions intended to implement the Strategic Objectives are set out in Annual Action Plans. These are developed by the ANEC Steering Committee (the Board of ANEC) and approved by the General Assembly. The management of the execution of the Plan rests with the Steering Committee.

Each Plan is a publicly-available annex to the Strategy 2014 to 2020. It needs to be taken into account in operations of the association at all levels, including by the ANEC Working Groups & Project Teams.

Naturally, the parameters of each Action Plan reflect the environment in which the Strategy itself was developed and adopted:

- ANEC is an international non-profit association established under Belgian law, and has to comply with the corresponding rules and regulations (eg: social and labour law).
- Its statutory objective is to promote, defend and represent the collective consumer interest in the work of the European Standards Organisations and any similar bodies concerned with standards that directly or indirectly affect consumers. This is because consumer expertise for standardisation work is weak or non-existent in most countries.
- ANEC is dependent upon funding from the European Commission (95%) and EFTA (5%). From 2015, its funding is provided through Annual Operating Grants under Framework Partnership Agreements that were signed with the EC & EFTA following a public call for proposals held during summer 2014. This was the first call launched under Regulation (EU) 1025/2012 on European standardisation. The time of the volunteer experts engaged by ANEC is considered by the Commission to be a notional contribution in kind (calculated to be worth 260.000€ in 2007).
- This funding is reliant on the acceptance by the Commission and EFTA of an annual work programme that explains the contribution of ANEC to the policy objectives of enhanced consumer protection and welfare, and a budget. The members of the General Assembly are individuals who represent all national consumer organisations in their countries, chosen by the consensus of those national consumer organisations.

¹ <http://tinyurl.com/nqel9z5>

- The General Assembly defines the policy of the association, supported by the Steering Committee. The technical work is executed through a network of consumer experts, co-ordinated and briefed by committees active in areas of priority chosen by the General Assembly:
Child Safety, Design for All, Domestic Appliances, Information Society, Innovation, Services, Sustainability (ex-Environment), and Traffic.
- Due to its constrained financial and human resources, including its reliance on volunteer experts, ANEC must set clear priorities.
- Standardisation is a consensual process that aims to reflect the views of all interested parties. Standardisation in CEN & CENELEC (and ISO & IEC) is based on the “national delegation principle”, through which delegations of experts sent by their national members take the lead in drafting European standards. But these delegations often lack consumer expertise or advice. European Standards are adopted through the route of national standards bodies and exist only when implemented as identical national standards.
- Although its representatives in CEN or CENELEC technical committees still do not have a vote, in common with other European “Partner Organisations”, from 1 January 2014, ANEC has the right to be part of the consensus that underpins the decisions of a technical committee at key stages in the development (or the review) of a European Standard. ANEC has also liaison status in several ISO or IEC technical committees.

II. Results ANEC Action Plan 2014

Quarterly Progress Reports were made to the ANEC General Assembly and Steering Committee. The final Progress Report on the ANEC Action Plan 2014 was issued in January 2015 for endorsement by the ANEC General Assembly.

9 out of 15 Actions were successfully completed while the remaining 6 Actions are delayed to 2015, mainly due to external factors (such as the blockage in Council on the Product Safety Package).

III. ANEC’s strategic priorities in 2015

For 2015, it is proposed to continue implementing the 2014 actions in support of Strategic Objectives 2 to 9.

In addition, new actions are prioritised, while actions in support of other priorities may be taken, especially where these represent a continuation of “business as usual”. For an organisation that has only limited resources at its disposal, such as ANEC, priority setting is an on-going exercise (Objective 1). Each year, an annual review of the activities in the ANEC areas or sectors of priority is undertaken by the ANEC Secretariat and the ANEC Working Groups to

check the continued relevance of the work programmes, and in helping decide whether resource should be transferred from an existing work item to a new work item.

IV. ANEC's Strategic Actions in 2015

OBJECTIVE 2 Within these areas of priority, and recalling the pre-eminence of legislation over standardisation, ANEC will aim to ensure the balance of standards and legislation that best meets the expectations of consumers, and achieves its vision of better protection & welfare for consumers of all ages and abilities.	Evidence of success	Key assumptions
ACTIONS FOR OBJECTIVE 2		
<p>2.a Consumer Product Safety Regulation</p> <p>In 2015, the European Parliament and Council of Ministers should adopt the European Commission's "Product Safety Package", comprising a proposal for a Consumer Product Safety Regulation (CPSR) to replace the General Product Safety Directive (GPSD), a proposal for a Market Surveillance Regulation and a multiannual market surveillance plan.</p> <p>In October 2013, the Internal Market & Consumer Protection (IMCO) Committee of the Parliament adopted its legislative report on the proposed CPSR. In line with the ANEC position, this report <i>inter alia</i>:</p> <ul style="list-style-type: none"> -called for the precautionary principle to be maintained as an explicit pillar, as it is of the present legal framework; -called for development of a comprehensive framework for the safety of services; -called for more prescriptive warnings and instructions for use; -called for measures to ensure the safety of products that appeal to children and to protect vulnerable consumers. <p>We intend to continue to lobby the European Legislators throughout the adoption process to ensure the new CPSR provides a high level of consumer protection. (WP 2015, Work Package 1, T1.8)</p>	<p>Adoption of the CPSR, by EP and Council, in line with the ANEC position.</p> <p>(ACTION DELAYED FROM 2014)</p>	<p>Proposal proceeds to adoption in 2015.</p>

<p>2.b Union Standardisation Work Programme</p> <p>Article 22 of the Standardisation Regulation sets up a Committee (“Committee on Standards”) to assist the Commission in implementation of the Regulation. Its role includes giving opinions on draft decisions on mandates, formal objections, consultation on the work programme for standardisation, and draft decisions on formal objections. ANEC is an observer member of the Committee on Standards.</p> <p>The Union Standardisation Work Programme should be issued every year in the form of a Communication and published in the Official Journal. It is important for consumer-relevant issues to be prioritised in this context. (WP 2015, Work Package 1, T1.2)</p>	<p>Union Standardisation Work Programme in 2015/6 reflects ANEC’s priorities</p> <p>(SECOND ANNUAL ACTION, COMPLEMENTING THAT FROM 2014)</p>	<p>Union Standardisation Work Programme is adopted in 2015.</p>
<p>OBJECTIVE 3</p> <p>In a climate of long-term financial uncertainty, and reduced public expenditure, ANEC will intensify its work to demonstrate that effective consumer participation is an investment with high returns to society and to business, and is not a cost on national or European public finances with few returns.</p>	<p>Evidence of success</p>	<p>Key assumptions</p>
<p>3.a Monitoring implementation of the Standardisation Regulation</p> <p>According to Article 24.2 of the Standardisation Regulation, the European stakeholder organisations that receive Union financing in accordance with the Regulation shall send an annual report on their activities to the Commission. The European Standardisation Organisations are also required to report about their activities, with special focus on stakeholder participation in standardisation. ANEC will use the opportunities provided by this reporting, and its positioning in the European Standardisation System (ESS), to ensure consumer representation is being strengthened at both European and national level. (WP 2014, table 7.9.2)</p>	<p><i>During the lifetime of this ANEC Strategy:</i></p> <ul style="list-style-type: none"> - evidence of the improved engagement of consumer representatives in the policy and technical committees of the national standards bodies and national (electrotechnical) committees; - evidence that ANEC has 	<p>Reporting under the Regulation is effective in allowing conclusions to be drawn.</p>

	<p>influenced European standards considered to be key for improved consumer protection and welfare.</p> <p>(CONTINUAL ACTION)</p>	
<p>3.b Review of European Standardisation System</p> <p>Before the end of 2013, the Commission should launch an independent review of the governance of the standardisation system to evaluate whether the strategic objectives of the Standardisation Regulation are being achieved. It will assess whether the ESS is proving able to adapt to a quickly-evolving environment and can contribute to Europe's strategic internal & external objectives, especially the fields of industrial policy, innovation & technological development. It will also examine whether the ESS is adequate from the perspective of market needs, of inclusiveness and of representativeness. The results will be assessed by the Commission to identify options that could further improve the ability of the ESS to support Europe's strategic policy objectives. ANEC will contribute to the review, calling for an evaluation of whether consumers (and other societal stakeholders) can effectively participate in the standardisation process. Also relevant for objective 9. (WP 2015, Work Package 1, T1.2)</p>	<p>EC review to show the fitness and relevance of the ESS is being improved through the more effective representation of societal stakeholders, at the national and European levels, or to identify the need for measures to ensure more effective representation.</p> <p>(ACTION DELAYED FROM 2014)</p>	<p>EC review is concluded in 2015.</p>

<p>OBJECTIVE 4</p> <p>Noting that perceptions are increasingly used as a driver in forming policy, ANEC will ensure it develops positions that respond to the real threats and risks to the health, safety & welfare of consumers.</p>	<p>Evidence of success</p>	<p>Key assumptions</p>
<p>ACTIONS FOR OBJECTIVE 4</p>		
<p>4.a Safety of Consumer Services</p> <p>The results of the consultation of DG SANCO 2014 Green Paper on Safety of Consumer Services COM (2014) 464, -are awaited for 2015.</p>	<p>Commission proposals for action following the Green Paper to take account of consumer</p>	<p>European Commission follows up in 2015 with</p>

<p>The Green Paper mainly focuses on Tourism Accommodation services. The related consultation covers safety aspects beyond fire safety (Carbon Monoxide safety, safety of balconies, rooms, glass doors) and cross-cutting aspects addressed include 'accessibility and vulnerable consumers' and 'data on injury and accidents', as advocated by ANEC. The Green Paper is accompanied by an annex detailing relevant facts and figures on hotel safety in different Member States.</p> <p>ANEC welcomed the Green Paper on the Safety of Tourism Accommodation Services and related consultation as it puts the debate of safety of services on the policy agenda. ANEC responded to the public consultation in November 2014.□</p>	<p>concerns and needs expressed in ANEC response to the consultation. (ACTION DELAYED FROM 2014)</p>	<p>concrete measures on safety of Tourism Service accommodation.</p>
<p>4.a Cross-borders consumer services complaints data</p> <p>Further to safety, it is recognised there are other areas of consumer detriment with respect to services that are of importance to consumers and should be considered when developing standards. In 2013, ANEC commissioned a study on the "Collection of complaints data on cross border services". The study released in 2014, aims at providing ANEC representatives in the services Technical Committees with evidence about consumer problems and complaints.</p> <p>Considering the results of the study and the prior ANEC experience in services standardisation, in 2014 ANEC developed the ANEC position paper: 'How can we make travel in the EU better for consumers?'. The paper compiles recommendations for policy makers and standardisers that can apply to more sectors of cross-border services.</p> <p>ANEC makes use of the data collected on practical examples of (cross border) consumer complaints in the consumer services area also in the work related to the implementation of Mandate M/517 on the programming and development of horizontal services standards. (WP 2015, Work Package 7, T7.1, T7.3)</p>	<p>Evidence that consumer representatives in services standardisation use the results of the 2013 Services R&T study on "Collection of complaints data on cross border services" and subsequent ANEC recommendations are promoted in new initiatives to promote European Tourism and in standards relevant to cross border consumer services (ACTION DELAYED FROM 2014)</p>	<p>Consumer relevant aspects in services standards are considered in the implementation of the second phase of M/517 due to be started in spring 2015</p>

OBJECTIVE 5	Evidence of success	Key
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<p>In order to strengthen the promotion of its positions and leverage its influence, ANEC will look to build “coalitions of the willing” among those who have common interest in its goals, and to position itself as a thought leader.</p>		<p>assumptions</p>
<p>ACTIONS FOR OBJECTIVE 5</p>		
<p>5.a European Injury Database coalition</p> <p>In 2013, ANEC & EuroSafe co-led a coalition of 30 European associations calling for the creation of an EU-funded pan-European database of accidents & injuries. Such a database is seen as key in identifying the need for a preventive measure (be it a legislative instrument or a standard) and assessing effectiveness of the measure. The call stresses that most national databases have been abandoned in recent years, often due to austerity measures, and notes that the USA has had a representative database in place for 20 years. The legal basis for the setting up of the database was supported by IMCO in its report on the Market Surveillance Regulation (also relevant for action 7.a) (WP 2015, Work Package 1, T1.8)</p>	<p>Adoption of a legal basis for European Injury Database in the Market Surveillance Regulation (ACTION DELAYED FROM 2014)</p>	<p>Proposal proceeds to adoption in 2015</p>
<p>5.b Chemicals in consumer products</p>		
<p>ANEC developed a standpoint asking for development of a European regulatory and standardisation framework for chemicals in products, following its longstanding activity in the area. This is a horizontal issue affecting several stakeholders and ANEC has collaborated with partners to raise awareness.</p> <p>In 2015, we plan to co-organise an event in the EP to promote the ANEC position on chemical requirements for products together with European Institutional and Member States representatives. (WP 2015, Work Package 8, T8.1)</p>	<p>Event triggers a reflection in the European Parliament and identifies opportunities and challenges for EU action during this parliamentary term. NEW ACTION</p>	<p>Event takes place</p>
<p>OBJECTIVE 7</p> <p>Given that the health, safety & welfare of consumers is critically</p>	<p>Evidence of success</p>	<p>Key assumptions</p>

<p>dependent on the effective implementation of pre-market actions (e.g. legislation & standards, conformity assessment & accreditation), ANEC will seek to strengthen political support for post-market actions (e.g. public market surveillance & enforcement).</p>		
<p>ACTIONS FOR OBJECTIVE 7</p>		
<p>7.a Market Surveillance Regulation</p> <p>In 2015, the European Parliament and Council of Ministers should adopt the European Commission’s “Product Safety Package” comprising a proposal for a Consumer Product Safety Regulation (CPSR) to replace the General Product Safety Directive (GPSD), a proposal for a Market Surveillance Regulation and multiannual market surveillance plan.</p> <p>ANEC welcomed the Commission proposal, made in February 2013, as it met our call for a harmonised European framework for market surveillance. We were also able to welcome the draft IMCO legislative report, published in June 2013, which foresaw a coherent and properly-resourced system of surveillance & enforcement within a European market. In October 2013, IMCO adopted its legislative report on the proposed MSR. In line with the ANEC position, this report <i>inter alia</i>:</p> <ul style="list-style-type: none"> - called for an explicit reference to the precautionary principle to remain; - called for consumers to be informed immediately in case of danger; - called for penalties to be proportionate and dissuasive; - called for cooperation between market surveillance authorities and consumer organisations to be facilitated; - called for internet sales to be included in the scope of the MSR; - called for a pan-European accident & injuries database to be established. <p>It is important for ANEC to continue to lobby for the adoption of the MSR by the Parliament and the Council of Ministers. (WP 2015, Work Package 1, T1.7)</p>	<p>Adoption of the MSR, by EP and Council, in line with the ANEC position.</p> <p>(ACTION DELAYED FROM 2014)</p>	<p>Proposal proceeds to adoption in 2015</p>

<p>7.b PROSAFE joint-actions</p> <p>PROSAFE market surveillance actions on highchairs, cords & drawstrings on children’s clothing, ladders, and CO detectors will end in 2015. Joint actions on cots, toys, chemicals in clothing, kick scooters and smoke detectors will continue in 2015. ANEC participates as a stakeholder in these joint actions.</p> <p>Joint market surveillance actions on acoustic toys, safety barriers, led lamps (CFL), fireworks and power tools will start in 2015. . ANEC intends to monitor some of these actions. (WP 2015, Work Package 1, T1.7, Work Package 3, T3.6, Work Package 5, T5.11)</p>	<p>Joint actions result in the removal of unsafe products from the European market, and in feedback and recommendations to the ESOs in order to improve existing standards.</p> <p>(CONTINUAL ACTION)</p>	
<p>7.c Marketwatch project</p> <p>Insufficient market surveillance is one of the main obstacles to the full realisation of energy saving potential of the EU Ecodesign and Energy Labelling Directives. The Marketwatch project, launched in 2013, aims at increasing the involvement of civil society in market surveillance activities related to Ecodesign and Energy Labelling. The project includes a number of specific activities and operations that civil society organisations will conduct towards this objective. ANEC is part of this project with environmental, consumer & energy non-profit organisations in several countries.</p> <p>The Consortium partners will revisit the same shops with significant share of non-compliance (>20%), revisit the same shops with no feedback from the escalation procedure, and visit new shops from the worst performing market segments as dictated by previous rounds. Additionally, a questionnaire and tender have been designed for the selection of laboratories under the MarketWatch programme for both check testing and full compliance testing in 2015.</p> <p>The results of Marketwatch testing will be leveraged primarily through communications we plan around them. Products need to have reach across multiple Member States, as this will not only result in larger communication opportunities, but also greater impact on energy savings.</p>	<p>Improved compliance of products with the Ecodesign and Energy Labelling Directives by the end of this ANEC Strategy.</p> <p>(CONTINUAL ACTION)</p>	

<p>OBJECTIVE 8</p> <p>In a globalised goods and services market, and with the advent of new consumer markets, ANEC will seek to ensure European standards stay effective in meeting the needs of European consumers, European legislation and public policies.</p>	<p>Evidence of success</p>	<p>Key assumptions</p>
<p>ACTIONS FOR OBJECTIVE 8</p>		
<p>8.a Transatlantic Trade and Investment Partnership (TTIP)</p> <p>It is possible negotiations on the planned EU-US free trade agreement (TTIP) will require ANEC to become involved in discussions on the role and use of standards. Collaboration with the Trans-Atlantic Consumer Dialogue (TACD) is foreseen. (WP 2015, Work Package 1, T1.3)</p>	<p>ANEC facilitates the consumer contribution to TTIP negotiations on the role, development & use of standards.</p> <p>(ACTION DELAYED FROM 2014)</p>	<p>TTIP negotiations proceed and address standards in 2015.</p>
<p>8.b ANEC involvement in International Standardisation</p> <p>Elaboration of ANEC position and guidance on scope and priorities for ANEC's work in standardisation at international level. (WP 2015, Work Package 1, T1.3)</p>	<p>Documents adopted by ANEC Steering Committee and ANEC WG Chairpersons.</p> <p>(COMPLEMENTARY ACTION TO THAT TAKEN IN 2014)</p>	
<p>OBJECTIVE 9</p> <p>Noting the continued predominance of the national delegation principle in formal standardisation, ANEC will seek to strengthen interaction between the consumer movement and standardisation nationally, through working to build relationships between consumers, national standards organisations and national authorities in the recruitment & training of experts, within a framework of support that is both tailored and sustainable.</p>	<p>Evidence of success</p>	<p>Key assumptions</p>
<p>ACTIONS FOR OBJECTIVE 9</p>		

<p>9.b Capacity building</p> <p>To explore practical actions to build consumer participation in standardisation, at both the national and the European levels, with the European Commission, the European Standardisation Organisations (ESOs) and their members. (WP 2015, Work Package 1, T1.3)</p>	<p>Identification and agreement on actions (short-term).</p> <p>(ACTION DELAYED FROM 2014)</p>	<p>Shared vision and commitment among the EC and ESOs.</p>
<p>9.b Training of consumer experts and consumer representatives</p> <p>In order to strengthen the knowledge of experts within the ANEC Working Groups on the latest legal and standardisation developments, we plan to hold further “mentoring and training sessions” as part of the meetings of the Working Groups. These sessions will also be dedicated to the on-going update of the ANEC Guide for Representatives, first issued in 2013. Since 2014, we also organise webinars/webmeetings on specific subjects such as the introductory/welcoming sessions for new members or the new procedure for standardisation mandates to provide experts with an occasion to develop their competences and skills. (WP 2015, Work Package 1, T1.4)</p>	<p>ANEC members and partners welcome training sessions.</p> <p>NEW ACTION</p>	<p>ANEC WG meetings take place.</p> <p>Distant learning tools are effective.</p>