



Raising standards for consumers



POSITION PAPER

Annual Union Work Programme for European Standardisation 2015

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Contact Person: Stephen Russell, Secretary General
(Stephen.Russell@anec.eu)

1. Introduction

This position paper expresses ANEC's views on the Annual Union Work Programme for European Standardisation for 2015, adopted by the European Commission on 30 July 2014¹.

As a member of the Committee on Standardisation (CoS)², ANEC commented on the preliminary version Union Work Programme and is pleased that many of comments expressed there have been taken into account³.

ANEC is also a member of the ICT Multi-stakeholder Platform and as such comments on the Rolling Plan for ICT Standardisation⁴.

For ease, we follow the order of the headings (but not the numbering) of the Commission document and focus on the aspects of consumer relevance.

2. Comments

2.1 Introduction

ANEC welcomes the intention of the Commission to organise calls for proposals during summer 2014 in relation to the European representation of consumers in standardisation work; ahead of a multiannual Framework Partnership Agreement.

Consumer representation in standardisation is weak or non-existent in most EU & EFTA countries⁵, and to address this weakness and so guarantee the relevance of a European standardisation process built on national delegations, there has been recognition since the 1990s of the importance of ensuring the participation of consumers directly at the European level.

¹ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL AND THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE The annual Union work programme for European standardisation for 2015 (COM(2014)500final).

² The Committee on Standardisation is established under Article 22 of Regulation (EU) 1025/2012 on European Standardisation.

³ [ANEC Position Paper on Preliminary draft of the Annual Union Work Programme for European Standardisation 2014](#) (ANEC-SC-2014-G-003)

⁴ ANEC comments on the Final Draft of the European Commission proposed outline for the Rolling Plan for ICT Standardisation (ANEC-ICT-2013-G-048)

⁵ <http://tiny.cc/shf1mw>. <http://tinyurl.com/yz7qys6>

In the use of standards as a tool to encourage industrial renaissance and renewed economic growth, it should not be forgotten that the use standards to achieve improved levels of consumer protection and welfare is an equally valid goal of the European policymaker.

2.2 Specific comments

Innovation and new technologies

Construction products

We welcome and support the Commission's intention to request the revision of the relevant European standards to reflect the new accessibility and sustainability requirements for construction works in Regulation 305/2011. It is important that construction works take into account the needs of all consumers, whatever their ages and abilities.

Smart grids and smart metering

We want to repeat our suggestion to elaborate standards on the interfaces with smart grid users, which was included in the Smart Grids iteration mandate at the end of 2012⁶. However, to our regret, little progress has been made since then.

It is essential the strategic programme for smart cities standardisation takes into account consumer requirements, such as privacy, private data protection and accessibility. We joined the Smart and Sustainable Cities and Communities Coordination Group at the beginning of 2014 in order to defend this view.

Strengthening the Internal Market in goods and services

Child Safety

We welcome and support the Commission's intention to request the development of European standards for a variety of childcare articles such as buoyant aids for swimming, as well as for playgrounds.

We asked for children jewellery standards to be developed and we are unsure whether the Commission's plan to request standards on "children's clothing and accessories" is including jewellery or not.

⁶ ANEC-PT-2013-AHSMG-003rev

In order for the Annual Union Work Programme to reflect the priority exercise done by the GPSD Committee, we would like to see jewellery for babies and children added under point 3.4.2.

Chemicals

ANEC welcomes the choice of chemicals as a priority in the Work Programme. In particular, we look forward to the advancement of the CEN SABE project 'Tailored support to TCs to address the use of hazardous/chemical substances in product standards', which ANEC has supported. However, we also underline our call for the regulation of chemicals in consumer products. ANEC has identified significant gaps in EU legislation regarding chemicals in products and called for a comprehensive regulatory approach to address these shortcomings.

Safety of specific services

We welcome the Commission's intention to consider potential standardisation items on safety of services such as hotel fire safety, based on the public currently consultation taking place. ANEC is convinced the standardisation of services has much to offer in removing unnecessary costs from the European economy, although we believe development of service standards at the European level will be frustrated without a harmonising legislative framework. Without such a framework, national deviations in European Standards will continue to undermine ENs where conflicting national legislation cannot be overcome

ANEC recently issued a research study⁷ on lessons that can be learnt from consumer complaints in the cross-border travel and tourism area. A related position paper⁸ including recommendations for standardisers was developed that could be useful for services aspects apart from safety: e.g. better awareness and enforcement of travellers' rights; clear (pre-contractual) information provision; complaints handling.

Healthcare

In light of the resistance of particular Member States to the standardisation of healthcare services, we support the Commission's intention to define which are the conditions for the development of standards in this area, and for which aspects, with a view to improving the quality of healthcare and support existing legislation (e.g. requirements of the cross-border healthcare directive, 2011/24/EU). ANEC has already given evidence to the Commission⁹ and CEN on areas where standards may benefit consumers, but there is need for further support from stakeholders before standards can be developed.

⁷ [ANEC research study on complaints related to European cross-border travel and tourism](#) published in January 2014 and the [ANEC leaflet: Key Facts on European cross-border complaints](#).

⁸ [ANEC position paper: How can we make travel in the EU better for consumer](#)

⁹ [ANEC response to the European Commission public consultation on patient safety and quality of care](#)

Accessibility

ANEC welcomes the wish of the Commission to use standards in implementation of the future European Accessibility Act and Web Accessibility Directive, two files on which we are working. We think EU harmonisation legislation ensuring the free movement of products should be extended to cover the accessibility of products, in order to provide a high level of consumer protection, and remove barriers both to consumers (e.g. obstacles to mobility) and traders (already done in the case of lifts, escalators, ramps). In addition, the safety of consumers with disabilities, and older consumers, should not be overlooked. In product safety legislation and standardisation, the age and abilities of consumers need to be taken into account in the assessment of risk if injuries are to be prevented.

Electrical and electronic equipment

We welcome the Commission wish to consider a possible standardisation request for the safety aspects of electrical products that due to their characteristics (e.g. child appealing), may be unsafe for segments of population that are particularly vulnerable. There are contradictions in legislation and standards as to whether or not a product is child appealing, and it is not clear how a product is judged to be child-appealing.

We also welcome the plan in section 3.4.20 to issue a standardisation request on a common charger for mobile phones & other portable devices ("universal chargers"), based on the study launched last by DG ENTR.

Digital Agenda for Europe

Please see our comments on the rolling plan for ICT standardisation¹⁰.

International dimension of European Standardisation

The need for (regional) European Standards is sometimes questioned, given the increasing globalisation of markets. In this context, ANEC can understand the need for globally-agreed International Standards where possible. However, there is a significant minority of Harmonised Standards (and other European Standards) that provide a presumption of conformity to legislation (legislation from which business and consumers benefit). This leads us to conclude that the development (or the revision) of a standard within Europe is to be preferred if the standard is to support legislation or broader public policies¹¹.

¹⁰ ANEC-ICT-2013-G-029final

¹¹ ANEC Position Paper on European Standardization System Strategy 2020 (ANEC-SC-2013-G-010final – April 2013)

In 2014 and 2015, we will follow the negotiations on the Transatlantic Trade and Investment Partnership, and its possible impact on the European Standardisation System and its procedures, given the considerable differences between the EU and US standards systems.

END.

About ANEC

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.



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**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

EC Register of Interest Representatives:
Identification number 507800799-30

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