

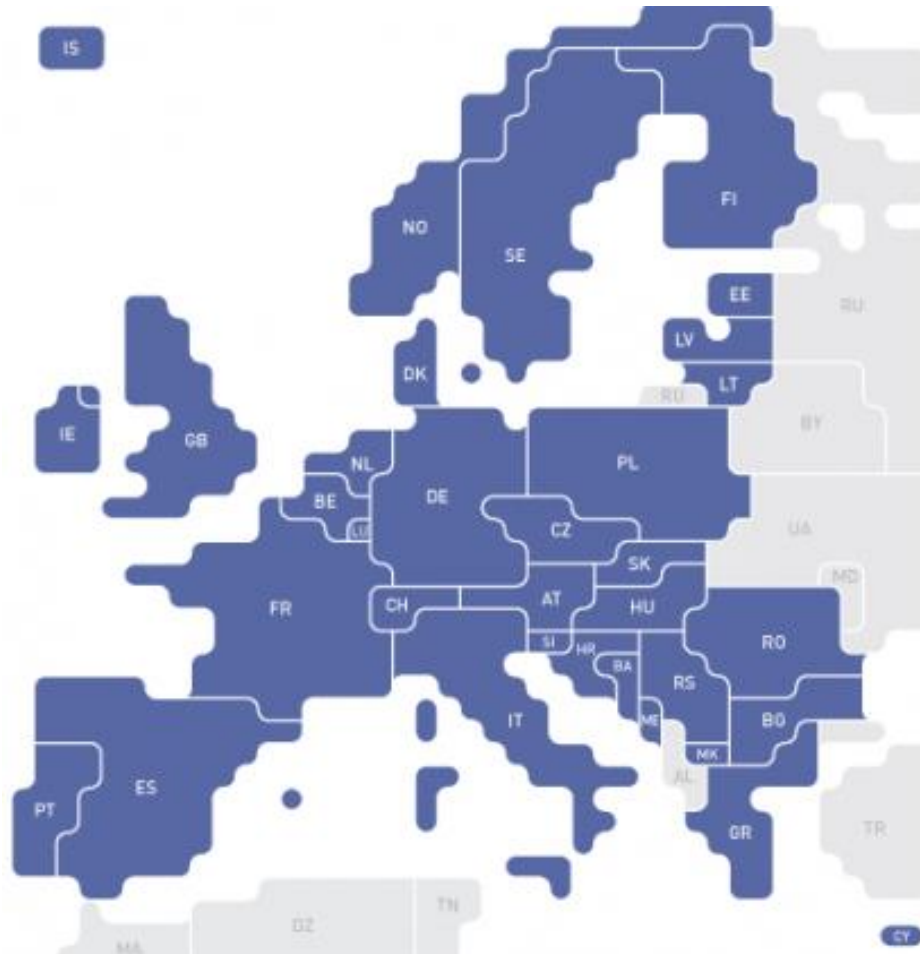


Consumer point of view on TBTs in TTIP

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TTIP stakeholder presentations event
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The Single Market

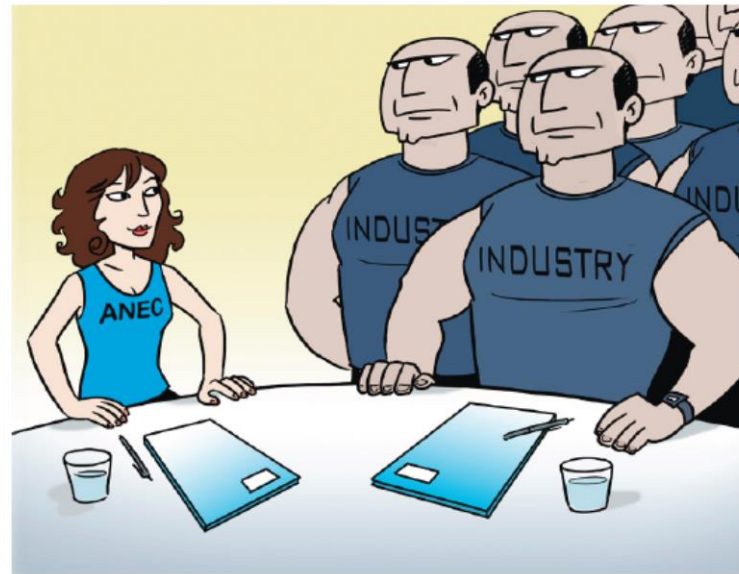


The New Approach

Raising Standards for Consumers

So consumer participation...

has been centralised at the European level since 1995:



'The European Association for the Co-ordination of Consumer Representation in Standardisation'

(or 'The European consumer voice in standardisation')

Convergence of regulatory approach and standards



Technical Barriers to Trade (TBT) but also linked to -consumer protection- legislation (eg: toys safety)

European Standardisation System (ESS): standards development procedure with consumer participation (legal basis Regulation 1025/2012)

Risks of recognition of equivalence/mutual recognition of standards and regulations:

- Impact on presumption of conformity as no equivalent function in US;
- Lack of consumer participation in US standardisation system; even at EU level participation of all stakeholders is encouraged but (bigger) business has most to gain from influencing the content of standards and has the knowledge and resources to participate;
- Definition and role of International Standards as no equivalence between EU and US;
- EU Standardisation System "single model" vs US Standardisation System "multiple model";
- Precautionary principle in EU safety legislation.

Raising Standards for Consumers

Conformity assessment and marking



TTIP objective: reduce “redundant and burdensome conformity assessment requirements” but “burdensome” for whom?

Risks of mutual recognition:

- Not possible without holistic approach (accreditation, compatibility of market surveillance, etc);
- Lack of proportionality with hazard/risk.

Risks of minimisation of marking/labelling:

- Use of labelling and marks to inform (or mislead) consumers (CE marking, country of origin, ...);
- How to assess what is “essential consumer information” and what is “superfluous consumer information”?
- Is country of origin indication (“Made in”) essential or superfluous?

Rearward-facing Child-Restraint Systems (UNECE I-size)



Thank you!



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Raising Standards for Consumers