



Raising standards for consumers



POSITION PAPER

ANEC CONTRIBUTION TO THE ISO STRATEGY 2016-2020

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1. Introduction

This position paper expresses ANEC's views on the ISO Strategy 2016-2020.

As a general comment, we reiterate and echo the concerns expressed by the ISO COPOLCO members at their meeting in May 2014 about the lack of reference to consumers in the Strategy document. The Strategy document refers to industry as a key player and mentions academia as an important stakeholder, but there is no mention of consumers. Perhaps as a consequence, the Strategy document does not refer to societal and public-interest focused standards. In our opinion, the Strategy document needs to make a distinction between "customer" (the ones buying standards and other ISO services) and "consumer" (the final non-professional users of products and services complying with ISO standards). One useful basis for stakeholder definition could be the pre-defined seven categories of stakeholders used in the ISO Global Directory, and reference to the ISO 26000 stakeholder categories.

For ease, we follow the order of the questions of the ISO Strategy Stakeholder's Guide¹ and reply to the questions we consider relevant to ANEC.

2. Answers

Question 1: *A successful ISO in 2020*

Do you agree with the description of ISO in 2020? We welcome any comments on ISO's governance, membership, partnerships and other elements related to our organization.

ANEC answer:

Noting the continued predominance of the national delegation principle in the standards development process, ISO should seek to strengthen the interactions between the consumer movement and the ISO Member Bodies. The strength of national consumer organisations is proportionate to their financial resources. The situation in very many European countries has seen a dramatic reduction in the

¹http://www.iso.org/iso/stakeholder_consultation_document_for_iso_strategies_2016-2020_-fr.pdf

income of national consumer organisations since 2008, from private and public sources of revenue. We doubt the experience of other countries is different.

Consumer representation in standardisation is weak or non-existent, even in most EU & EFTA countries². Furthermore, such representation must not be confused with consumer *expertise*. Consumer expertise is even more scarce, especially given the added complexity arising from the convergence of technologies. This scarcity of expertise, coupled with the voluntary and unpaid participation on which the consumer movement relies, places the consumer voice at a very considerable disadvantage compared with that of business.

With the globalisation of markets, the need for globally-relevant International Standards is increasing. But different regulatory and public policy requirements exist, especially as regards consumer protection. ISO should consider how to improve the participation of consumers and public interest representatives in its standard development process.

For these reasons, we believe separate votes of adoption for standards developed in parallel with CEN under the Vienna Agreement need to be maintained.

Question 2: *Identify needs and ideas*

- *How should ISO build its capacity to identify new standardization needs?*
- *What important global challenges should be addressed, or better addressed, by ISO?*
- *What else?*

ANEC answer:

We think that international service standardisation will increase in the future due to greater liberalisation and cross-border trade. Safety, hygiene, information provision, customer satisfaction, complaints handling & redress procedures, the competence of personnel, contracts & billing, and accessibility should be at the centre of ISO service standards. We also expect ISO to adapt its standardisation process and rules to reflect the specificities of service standardisation which are different from those of product standardisation. Service standards differ because of the intangible nature of services and the fact that aspects of the service are often performed by different providers. For this reason, service standards need to be approached holistically and the overlap or relationship between the different

²<http://tiny.cc/shf1mw>

parts of a standard should always be considered. Service provision is by nature a *continuum*. The splitting of a standard into parts should not alter this *continuum*³.

Another key challenge facing consumers in the coming years is the overload of information about products and services. Making an informed choice can currently prove difficult, whether the purchase is on-line or off-line. Standards can help provide information on products and services that is both comparable and meaningful to consumers, so allowing them to become knowledgeable and not only informed.

Question 3: *Develop proposals and start work*

- *Who should be consulted and who should decide on what's in or what's out?*
- *What new approaches and technologies can be used to get market-relevant feedback on proposed new work?*
- *What else?*

ANEC answer:

Better consumer participation in standardisation should start from the beginning and be ensured throughout the standards development process. Although ANEC is perhaps unique in its role – in representing the collective interest of consumers in the development of standards – we think the role of COPOLCO should be widened to allow the consumer voice to be heard more clearly in the technical bodies of ISO. Given that the consumer expertise needed for standards work, through lack of resources both human and financial, is weak or non-existent in many countries, we believe such a mechanism would strengthen the market relevance of ISO standards, complementing the national delegation principle in their development.

From a practical point of view, the ISO NWIP template should be modified to better highlight the consumer relevant issues. For example, reference to the pre-defined seven categories of stakeholders used in the ISO Global Directory and to the ISO 26000 stakeholder categories should be made.

This should help stakeholders review the relevance of proposals.

Question 4: *Get consensus of experts and members*

³[ANEC position paper: "Should we split?"](#), August 2014

- *What changes to ISO's structures (e.g. TC, SC, PC, WG) and processes should take place by 2020 to make things simpler, faster and better? How should project-based approaches drive ISO's work?*
- *How will ISO become the preferred forum in 2020 for members and experts to provide their ideas and intellectual property?*
- *How should ISO standards differ from those developed by other organizations?*
- *What else?*

ANEC answer:

We do have serious concerns about the intent to shorten the timeframes for the development of standards. From our perspective, a cut in the present timeframes would jeopardise the characteristics of transparency and consensus that underpin ISO standards. Moreover, if timeframes are cut, the possibility for voluntary experts to participate on behalf of societal stakeholders is further reduced. We do not think it can be the wish of ISO Member Bodies to put at risk the special status of ISO (that it holds with IEC) and for ISO to become just another "international SDO".

The process of standards development in ISO needs to remain open and enable all interests – public & private; economic & societal - to achieve a genuinely effective participation. We believe there is need for metrics on how Member Bodies tackle stakeholder engagement, including consumer participation.

Question 5: Publish, sell and promote

- *What new range of products and services should ISO be providing in 2020 (e.g. explanations, interpretations as part of standards, or additional content to facilitate their use)?*
- *How could ISO better promote, disseminate, preserve and protect its intellectual property in 2020?*
- *What else?*

ANEC answer:

With ever more open information and open data, we think ISO needs to continue to address whether a business model based on the sale of copyrighted documents is sustainable (the activities of Public.Resource.Org in publishing standards on its website are well-known to the standards community).

Question 6: *Take actions to implement*

- *How can the ISO system better assess the level of implementation of its standards?*
- *How can ISO/CS better promote the implementation of ISO standards in its members' countries?*
- *How can ISO improve its understanding and connection with different global schemes and programmes that help to implement standards?*
- *What else?*

ANEC answer:

Market Surveillance authorities should be a source of valuable information on the implementation of standards and potential problems.

Question 8: *Ensure resources and infrastructure*

- *How should ISO be perceived by governments, industry, consumers and other groups in 2020? What new roles should it be playing?*
- *What business processes and technologies will be important for ISO in 2020 to meet customer needs? How should ISO's governance evolve to meet these needs?*
- *How should ISO:*
- *Increase developing country participation in ISO technical work*
- *Build the capacity of members on standardization and related matters*
- *Increase awareness of the role and benefits of standardization*
- *Improve the institutional strength of ISO members in developing countries*
- *What else?*

ANEC answer:

Strengthened consumer and public interest participation in the development of standards would reinforce the recognition of ISO standardisation by regulators. The contributions from consumer representatives should become enmeshed in the standards development process and be considered as important in the shaping of standards as those of the business interest (which, while contributing the most to the process in terms of resources, do have the most to gain commercially from influencing the content of a standard).

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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