

Brussels, 23 June 2015

The European Commission's standardisation requests should be relevant to standards users and markets

Comments on the report "Independent Review of the European Standardisation System"¹

Executive Summary

All INGRESS members look forward to participating in a constructive dialogue with the European Commission, Member States and other standardisation stakeholders in order to improve the European Standardisation System (ESS).

Likewise, likewise the ESS may support the needs of their membership to operate within a European Internal Market as effectively and lawfully as possible to sustain growth and jobs in Europe. In this respect, we recommend that:

1. Speed should not prevail over a careful consensus-building process.
2. INGRESS be involved as an observer in the Committee on Standards to add legitimacy and inclusiveness in the planning future European standardisation strategy.
3. Harmonised standards should remain practical documents and not be politicised.
4. Internationally accepted state-of-the-art standards should be taken into account where possible.

Introduction

The European Commission announced that it is considering the possibility of revising Regulation EU 1025/2012, to follow up its own "Strategic Vision for European standards" (01/06/2011)² which aims to improve the speed and inclusiveness of standards development while providing support to competitiveness, European policies and legislation, and the global effort.

As acknowledged by the report, the European Standardisation System works well overall and is considered fit for purpose by a majority of stakeholders. As standards serve different purposes depending on the specific needs of each industry sector, the Industry Group on European Standardisation Strategy (INGRESS), will focus its comments on the over-arching aspects of the relationship between the European legislator and standardisation, referred to by the European Commission as 'governance' in the study.

Recommendation 1.1 – Improve the speed of standards development through an alternative scheme for specific standardisation needs

Improved speed in the standards development process is a goal shared by many industries. However, we believe that speed should not prevail over a careful consensus-building process, involving all relevant stakeholders in order to develop the best fit-for-purpose solutions. It is up to each industry sector to determine on a case-by-case basis what is a reasonable time frame for developing the standards that they need to design their products or supply their services to their respective markets.

¹ Ref. Ares(2015)1874169 - 04/05/2015 written by Ernst & Young

<http://ec.europa.eu/DocsRoom/documents/10084/attachments/1/translations/en/renditions/pdf>

² <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1432030135876&uri=CELEX:52011DC0311>

Therefore, we recommend that the European Commission involves INGRESS – as the main stakeholder representing standards experts and users – earlier in the preparation of European standardisation requests, to ensure a smoother and faster process at the development stage of standards. It would serve to increase confidence between the authorities and the industries concerning market relevance of those standardisation requests and the overall efficiency of the process for the development of corresponding standards.

Recommendation 3.1 – Anticipate needs through strategic and operational planning

INGRESS believes that it is the role of policy-makers rather than standardisers to establish the legal framework. We acknowledge the European Commission’s ambition to consider in detail how the use of European standards by market operators may contribute to support their strategic and operational planning of policies and legislation in various areas, as was recently echoed in its Digital Single Market strategy.

Moreover, INGRESS recommends keeping standardisation primarily as a market instrument to help market operators elaborate the technical details that will best combine their market needs with their legal obligations.

Harmonised standards should remain practical documents and not be politicised. Standards will only support public policies and legislation if they are used. As standards are voluntary, they will only be used by industries and their clients if they correspond with their market needs. As such, ‘European’ and ‘harmonised’ standards both contribute to supporting the European framework conditions that market operators need to operate within the European Single Market.

Recommendation 4.1 – Ensure involvement and participation of Annex III organisations in the standardisation process

INGRESS members remain committed to continuing to contribute financially and/or send their experts to provide their knowledge for the benefit of the European Standardisation System, provided that it continues to primarily serve their needs in manufacturing products and servicing their clients in Europe.

We acknowledge the ambition of European policy-makers to promote the involvement of Small and Medium Sized Enterprises (SMEs) and interested societal stakeholders (environmental, consumers, workers) into the development of standards.

This is however not sufficient to ensure the ‘inclusiveness’ of future European standardisation requests. This is why we invite the European Commission to consider the involvement of INGRESS, as the alliance of industry stakeholders, as an observer in the Committee on Standards, responsible for implementing Regulation EU 1025/2012. Granting this request would ensure the inclusiveness of the Committee’s decisions and a smoother adoption of draft standardisation requests by European Standardisation Organisations; as industry’s viewpoint, as the main potential contributor to and user of requested standards would be represented.

Recommendation 5.1 – Strengthen the link between standardisation activities at international level and EU policy and legislative needs, and identify priority areas of work at international level

Standards – whether requested by the European Commission or not – should remain market-relevant and be attractive to their main potential users: European industries are increasingly looking to international standards to support their access to global markets, based on their own specific interests.

Industry Group on European Standardisation Strategy

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Therefore, INGRESS supports the idea that where possible, internationally accepted state-of-the-art standards should be taken into account when relevant European standards are being developed. However, we do not see the need for the European Commission to identify priority areas of standardisation work at international level, which is the privilege of each industry sector.

This position has been adopted on 23 June 2015 by the 20 members of INGRESS, the Industry Group on European Standardisation Strategy, which includes ACEA, BIBM, CAPIEL, CECAPI, CECE, CECED, CECIMO, CEIR, CEMEP, COCIR, EFCEM, EGMF, ESMIG, EUBAC, EURALARM, EUROPACABLE, EUROPUMP, FEM, ORGALIME and T&D EUROPE.

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Members of INGRESS

the INdustry GRoup on European Standardisation Strategy

 <p>European Automobile Manufacturers Association</p>	<p>The European Automobile Manufacturers' Association</p> <p>ACEA represents the 15 Europe-based car, van, truck and bus makers. ACEA is the advocate for the automobile industry in Europe, and engages in dialogue with the European institutions and other stakeholders in order to advance understanding of industry-related issues, helping to contribute to effective policy and legislation at both European and global levels.</p> <p>INGRESS Council Member: Mr Erik Jonnaert, Secretary General Transparency register number: 0649790813-47</p>
	<p>The European Federation for Precast Concrete</p> <p>BIBM is the federation of the European Precast Concrete Industry. It contributes to the development of the sector by coordinating and promoting the industry views on European and international issues.</p> <p>INGRESS Council Member: Mr Alessio Rimoldi, Secretary General Transparency register number: 07055806769-32</p>
 <p>CAPIEL* european coordinating committee of manufacturers of electrical switchgear and controlgear</p>	<p>The Coordinating Committee for the Associations of Manufacturers of Switchgear and Controlgear</p> <p>CAPIEL is the Coordinating Committee for the Associations of Manufacturers of Switchgear and Controlgear equipment for industrial, commercial and similar use in the European Union, that work in the range of voltages until 1 kV a.c. of 1,5 kV d.c..</p> <p>INGRESS Council Member: Mrs Delphine Eyraud-Galant, Secretary General Transparency register number: 492532816900-02</p>
 <p>Comité Européen des Constructeurs d'Appareillage Electrique d'Installation European Committee of Electrical Installation Equipment Manufacturers</p>	<p>The European Committee of Electrical Installation Equipment Manufacturers</p> <p>CECAPI promotes and develops the collective and common technical, industrial, economical and political interests of the European electrical installation equipment manufacturing industry.</p> <p>INGRESS Council Member: Mrs Concepción Garcia, President Transparency register number: 599743711223-32</p>
 <p>COMMITTEE FOR EUROPEAN CONSTRUCTION EQUIPMENT</p>	<p>The European Committee for European Construction Equipment</p> <p>CECE is the recognized organization representing and promoting the European construction equipment and related industries, co-ordinating the views of National Associations and their members by influencing the European/National Institutions and other organizations worldwide to achieve a fair competitive environment via harmonized standards and regulations.</p> <p>INGRESS Council Member: Mrs Sigrid de Vries, Secretary General Transparency register number: 60534525900-25</p>



The European Committee of Domestic Equipment Manufacturers

CECED is representing household appliance manufacturers in Europe. Its members, European producers and non-EU companies that have operations in the EU, cover around 90% of the European market of household appliances. With a turnover of 35 billion euros and half a million employees, this is a major sector for the EU economy.

INGRESS Council Member: Mr Paolo Falcioni, Director General

Transparency register number: 04201463642-88



The European Association of the Machine Tool Industries

CECIMO brings together 15 national associations of machine tool builders, which represent approximately 1,500 industrial enterprises in Europe, over 80% of which are SMEs. CECIMO covers 98% of the machine tool production in Europe and about one third worldwide.

Mr Filip Geerts, Director General

Transparency register number: 79464041975-17



The European Association for the taps & valves industry

CEIR gathers together a large number of European manufacturers in the field of valves and fittings. CEIR represents the common economic, technical and scientific interests of the European valve industries, in particular towards international authorities and economic and commercial circles.

INGRESS Council Member: Mr Klaus Schneider, President

Transparency register number: 54018122087-60



The European Committee of Manufacturers of Electrical Machines and Power Electronics

CEMEP is the European Committee of Manufacturers of Electrical Machines and Power Electronics, representing an industry with a market value of €6.3 billion and 130,000 employees.

INGRESS Council Member: Mr Andrea Solzi, Secretary General

Transparency register number: Registration in progress



The European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry

COCIR is the European Trade Association representing the medical imaging, health ICT and electromedical industries. COCIR is a non-profit association headquartered in Brussels (Belgium) with a China Desk in Beijing since 2007.

INGRESS Council Member: Mrs Nicole Denjoy, Secretary General

Transparency register number: 05366537746-69



EFCEM represents European national associations whose members are manufacturers of commercial kitchen equipment

EFCEM represents manufacturers and distributors of equipment for the storage, preparation, cooking, distribution of food and ware-washing and laundry equipment for the catering, hospitality, foodservice sectors, whether they are profit or not for profit operations. EFCEM covers around 90% of the European market of catering equipment.

INGRESS Council Member: Mr Fabio Gargantini, General Secretary

Transparency register number: 070284916886-11

	<p>EGMF, the European Garden Machinery industry Federation</p> <p>EGMF members comprise 29 European garden, landscaping, forestry and turf equipment manufacturers and 8 National Associations from Belgium, France, Germany, Italy, Netherlands, Spain and the UK. It is estimated that each year EGMF members sell in Europe more than 6 million lawnmowers, 4.5 million chainsaws, 3 million brushcutters and 3 million hedgetrimmers.</p> <p>INGRESS Council Member: Mr Karsten Biber, EGMF President</p> <p>Transparency register number: 82669082072-33</p>
	<p>The European Smart Metering Industry Group (ESMIG)</p> <p>ESMIG is the European industry association that provides knowledge and expertise on Smart Metering and energy-related consumer services within the Smart Grid area at a European level.</p> <p>INGRESS Council Member: Mr Willem Strabbing, Managing Director</p> <p>Transparency register number: 71326222148-95</p>
	<p>The European Building Automation and Controls Association</p> <p>Eu.bac is the European Building Automation and Controls Association and represents the European manufacturers for Home and Building Automation and Energy Service Companies.</p> <p>INGRESS Council Member: Dr. Peter Hug, Managing Director</p> <p>Transparency register number: 20943263315-44</p>
	<p>The association of European manufacturers, installers and service providers of the electronic Fire Safety and Security industry</p> <p>Euralarm is the association representing the electronic fire and security industry, providing leadership and expertise for industry, market, policy makers and standardisation bodies. Euralarm represents over 5.000 companies with an estimated cumulated revenue of 18 Billion Euros.</p> <p>INGRESS Council Member: Mr Glen Dale, General Director</p> <p>Transparency register number: 94201247949-87</p>
	<p>Europacable is the voice of all leading European wire and cable producers. Europacable members include the largest cable makers in the world providing global technology leadership, as well as highly specialized small- and medium sized businesses from across Europe.</p> <p>Globally Europacable's members employ over 70.000 people of which more than 50% in Europe generating a turnover over € 20 billion in 2014. The product scope of our members covers the full range of energy and communication cables.</p> <p>INGRESS Council Member: Mr Thomas Neesen, Secretary General</p> <p>Transparency register number: 453103789-92</p>

	<p>The European Association of Pump Manufacturers</p> <p>Europump represents 17 national associations, over 450 companies employing some 100,000 people in Europe, and has a collective annual production worth over 10 billion euros. Pump manufacturing is a growing and SME-driven sector. With almost half of all world exports and 40% of major patent applications, the Western European pump industry is the economic, commercial and technological leader.</p> <p>INGRESS Council Member: Mr Guy Van Doorslaer, Secretary General Transparency register number: 07655452075-36</p>
	<p>The European Materials Handling Federation</p> <p>FEM represents European manufacturers of materials handling, lifting and storage equipment. The sector employs 300,000 people directly and generates €55bn annual turnover with a largely positive trade balance (+€18bn in 2013).</p> <p>INGRESS Council Member: Mr Olivier Janin, Secretary General Transparency register number: 24068881115-97</p>
	<p>The European Engineering Industries Association</p> <p>Orgalime, the European Engineering Industries Association, speaks for 41 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10 million people in the EU and in 2013 accounted for some €1,700 billion of annual output.</p> <p>INGRESS Council Member: Mr Adrian Harris, Director General Transparency register number: 20210641335-88</p>
	<p>The European Association of Electricity Transmission & Distribution Equipment and Services Industry</p> <p>T&D Europe aims to promote the common interests of the European electricity transmission and distribution manufacturing industry towards and in cooperation with the EU institutions. T&D Europe represents all relevant European national associations. The companies represented by T&D Europe account for a production worth over € 25 billion, and employ over 200.000 people in Europe.</p> <p>INGRESS Council Member: Mr Oliver Blank, Secretary General Transparency register number: 90453504235-64</p>