Increasing complexity in a modern economy makes standardisation a key competitive factor

If the EU wants to continue to shape the rules governing international trade, it is crucial that we take steps to strengthen European capacity in setting global standards. The pioneering role of Europe as a business location and the attractiveness of the Single Market, to which global markets and potential new partners orient themselves, must be expanded.

To enable industry to contribute to highly set political objectives, such as the twin transitions and increased resilience, the EU needs an innovation-friendly legislative framework that can easily adopt the latest technological advancements. It is also key for setting international standards, thereby opening market access for industry while furthering European interests and values on the global stage.

As such, standards are an indispensable tool for the export-oriented European industry and vital for a vibrant, efficient and internationally competitive European economy that creates jobs and prosperity for European citizens.

Against this background, we would like to put forth concrete proposals to further the implementation of the European Strategy on Standardisation – setting global standards in support of a resilient, green and digital Single Market.
Coordinate market and policy priorities in standardisation more efficiently through industry participation in the governance structure

In order to take into account the increasing challenges in standardisation, the successful bottom-up driven European approach to standardisation must be effectively complemented by the top-down approach, which today is being moved more into focus. Political expertise refers to contributions and advice to European Standardisation Organisations (ESOs), insofar as standards can make a contribution to the strategic orientation of the European Union. The following recommendations should be observed when interlocking:

- To ensure industry representation in decision-making on standardisation policy, representatives of the European umbrella organisations should be invited to join the Committee on Standards.

- The newly created position of EU Chief Standardisation Officer (CSO) shall oversee the new EU High-Level Forum on Standardisation (HLF) as well as the new EU Excellence Hub on Standards. A central task of the EU Excellence Hub must be to ensure the uniform evaluation of standards by EU Harmonised Standards (HAS) consultants. In order to ensure the functioning of the European Single Market, the current standards backlog must be effectively addressed as quickly as possible.

- The scope of the CSO must be clearly defined to entail uniform application of standards across all services of the European Commission, coordination of standardisation activities between services, promotion of standardisation as a regulatory relief tool within the framework of the New Legislative Framework (NLF) and contact point for industry.

- The HLF should make effective use of existing structures, such as the ICT Multi-Stakeholder Platform and redundant structures should be avoided. To this end, all governance structures and processes apart from those in the ESOs must be aligned with the HLF.

Maintaining and strengthening the European Standardisation System

Global competitiveness starts at home, with a well-functioning European Standardisation System (ESS). The ESS is internationally competitive and appreciated by industry. The necessity of a systemic approach, independent of the political priority area, is beyond question and in order to ensure the future viability of the system, adjustments need to be made:

- Removing bottlenecks in the system for developing harmonised standards is key to promoting innovation and technological progress. All organizations and institutions involved must swiftly engage in a process to improve the functionality of the system. We expressly support the proposals in the "Joint Industry recommendations for effective Harmonised Standardisation" from July 2021.

- An overuse of Common Specifications risks undermining the principles of the NLF. It can lead to a regulatory framework that is less responsive to recent technological advances, thereby stifling innovation. A market-driven and inclusive process is necessary to ensure market relevance and state-of-the-art standards. Also, the use of Common Specifications can undermine the functioning of the Vienna and Frankfurt Agreements and lead to diverging technical requirements compared to the requirements in international standards, creating technical barriers to trade for European industry. There needs to be a clear commitment from the European Commission that Common Specifications are a fallback option to unavailable harmonised European standards, with set criteria for when such exception may be justified. In this regard, the proposals in the paper on “Common Specifications” should be implemented.
- Limiting the participation of major trading partners in the development of harmonised European standards – such as the United Kingdom and Switzerland – may disincentivise future regulatory cooperation and have a negative spill-over effect on trade policy, exacerbating a politically driven decoupling process that limits the benefits of international trade for European industry. As such, the governance structure of the ESS must ensure the inclusivity and attractiveness of the system for experts, including from key trading partners, to participate and remain engaged in the development process of harmonised European standards.

**International cooperation underpins the technological leadership of the European Union**

International standards form the basis for an efficient, export-oriented and internationally competitive economy. Via ISO and IEC, the international body of standards is essentially harmonised, in other words free from contradictory technical requirements, and enjoys a high level of global acceptance. The continued integration of the European Standardisation System into the international one must be ensured in order to limit technical barriers to trade and open market access. At the same time, the increasing strategic orientation of standardisation and the international integration of European value chains require more international cooperation with partners outside the European Union:

- Standardisation activities should always take place at the highest possible level. Regional and/or National activities should only be conducted when international bodies conclude there is no need for an international standard.

- International standards must become an integral part of European trade strategies and agreements in the future.

- The results of Working Group 1 [Technology Standards] of the Trade and Technology Council (TTC) must be transferred to an operational level as soon as possible, where the establishment of topic-related stakeholder dialogues is conceivable. The goal must be new international standards developed jointly with the USA and the subsequent adoption in European/National Standards. Any such standardisation activities shall take place in international fora under ISO, IEC and ITU. Projects can be launched and coordinated in an advisory capacity by the European High-Level Forum (HLF). However, the technical and operational work must be reserved for experts from industry.

With these considerations and proposals, we hope to make a constructive contribution to the implementation of the European Standardisation Strategy. We are always available for clarifications and in-depth discussions at any time.