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PUBLIC CONSULTATION ON STANDARDISATION PACKAGE

OVERVIEW OF THE RESPONSES

1. EXECUTIVE SUMMARY

Within the scope of the Impact Assessment exercise concerning the reform of the European Standardisation System, this public consultation was carried out between March 23rd and May 21st 2010 (see Open Consultation Document in annex).

The aim of this consultation was to give all standardisation stakeholders the possibility to express their views on the current functioning of the European Standardisation System and on the possible improvements that could be implemented.

Following the impact assessment study previously performed by Technopolis on behalf of the Commission, 14 questions were formulated and addressed to the public.

Due to the high interest in standardisation and a large publicity, this initiative has been very successful in terms of number of replies. A total number of 483 answers from various categories and nationalities of stakeholders were received. A detailed analysis of the respondents is presented in point 3 of this report.

The 14 questions were grouped into 4 main topics:

- a) Adaptation of the European Standardisation System to the rapid evolution of technologies
- b) Avoidance of the creation of new technical barriers to trade for products and services in the internal market
- c) Adaptation of the European standardisation system to new markets and societal challenges
- d) Cost of standards

As a summary of the replies, we can conclude that, independently from the category of stakeholders (citizens, companies, industry associations, public authorities, organisations of public interest, European and National Standards Bodies), there is a general satisfaction with the current structure and functioning of the European standardisation system.

Respondents clearly highlight that it is vital to preserve the national delegation principle. In addition to this, they are not in favour of opening up the process to new standardisation actors (e.g., fora and consortia) because of potential concerns in terms of the transparency and limited stakeholder involvement.

Respondents also underline the beneficial inputs and outcomes which derive from the public-private partnership nature of the system currently in place and they are concerned with any potential interference of Brussels-based authorities.

Last but not least, from the replies that have been collected, a strong need emerges to further promote the importance of standards in general and to make standards user-friendlier and more accessible, also in terms of purchasing price.

In general, respondents showed their appreciation for this public consultation initiative and the possibility they had to express their views on the review of the European standardisation system.

2. INTRODUCTION

This public consultation is part of the Impact Assessment study on the review of the European Standardisation System. It has been specifically designed to gather opinions and feedback from stakeholders on the current standardisation system and on some possible options of change for the future. Stakeholders' views will help the Commission shape concrete proposals to improve the functioning of European standardisation, notably in the context of the EU Research and Innovation Plan.

In the most recent years, a need has emerged to make the European Standardisation System standardisation system more reactive to innovation and more supportive with regards to the competitiveness of European companies. This is why, in its Communication (Com(2008)133 final, of 11th March 2008), the European Commission called for a reform to strengthen the European Standardisation System (ESS). This revision of the ESS was also encouraged by the Council in its Conclusions of 25th September 2008. In addition to this, the Small Business Act (Com(2008)394 final) invited the ESOs to review their Business Model and called for an adaptation of the ESS to the needs of SMEs. Most recently, the Commission proposal of 3 March 2010 for a new Europe 2020 Economic Strategy stresses the key importance of innovation for the achievement of the EU's strategic objectives of smart, inclusive and sustainable growth and mentions in this context that "speeding up setting of interoperable standards" is an important factor to improve framework conditions for business innovation.

In parallel to some initiatives specifically dedicated to the ICT sector, in 2009 the Commission undertook its first actions in the direction of a review of the system in place: a group of standardisation experts - called EXPRESS – elaborated a series of recommendations for the review of the European Standardisation System. In addition, a study was commissioned to Technopolis to evaluate the impact some more radical changes would have on the economic and financial sustainability of the system.

This public consultation aimed at gathering stakeholders' views on the current European Standardisation System, taking into account some of the proposals of change put forward by the EXPRESS report and the Commission itself.

3. RESPONDENTS

In the period from March 23rd 2010 to May 21st 2010, a total number of 483 replies were sent to the three functional mailboxes for this public consultation (citizens, public authorities and organisations). The distribution of replies amongst the different categories of stakeholders is as follows:

	Number of responses	% of total respondents
Citizens	68	14,1%
Companies (it includes 19 SMEs)	158	32,7%
ESOs & NSBs	29	6,0%
Industry associations	162	33,5%
Organisations of public interest (it includes NGOs, environmental and consumer associations and trade unions)	17	3,5%
Public authorities	39	8,1%
other categories	10	2,1%
TOTAL	483	

In geographical terms, Germany is the biggest contributor with 213 replies.

Other bigger contributors are as follows: France (58/483 - 15%), UK (25/483 - 5,2%) and Spain (17/483 - 3,5%)

Out of the 10 categories of stakeholders reported above, we selected the following six ones for the purpose of this analysis:

	Number of responses	% of total respondents
Citizens	68	14,1%
Companies	158	32,7%
ESOs & NSBs	29	6,0%
Industry associations	162	33,5%
Organisations of public interest (it includes NGOs, environmental and consumer associations and trade unions)	17	3,5%
Public authorities	39	8,1%

A breakdown of the results by these six categories will be provided for each question.

It must be mentioned that some of the replies present are similar and/or often identical. For instance, this is the case of the 26 replies that were sent by companies belonging to the Saint Gobain Group, or the 21 replies that were sent by companies which are part of the German Industry Association VDMA.

In those cases, we decided to consider each single reply as an individual one, thus following the same policy that was adopted for the publication of the replies on the Europa website. Actually, we believe that it would not be fair to avoid taking into account the contribution of a single reply just because it comes from a group or just because a reference is made to the opinion of an association.

We are aware that this choice will give a considerable weight, in statistical terms, to the opinions of these associations or groups. However, we are convinced that it would be discriminatory to ignore the contribution of one of these replies – that, once again, come from individual entities - to this public consultation.

4. METHODOLOGICAL APPROACH

The consultation document and the fourteen questions it contains aimed at gathering stakeholders' opinions and views on a potential review of the European Standardisation System. The final goal was to make stakeholders react to some propositions of change and suggest possible alternative solutions.

Open-ended questions were identified in the majority of cases as the most adequate means to accomplish this goal, since they allow respondents to make comments and observations supporting their position with regard to one particular topic.

An illustration of the results of this consultation with a breakdown by category of respondents will be presented in the following section of this document. No breakdown by country was undertaken since it does not seem relevant for the purpose of this public consultation.

Due to the large amount of replies that we collected, far beyond our initial expectations, the need to facilitate the analysis of the responses imposed some methodological constraints. The qualitative nature of this consultation was preserved and the opinions and suggestions expressed by stakeholders were duly noted down and taken into account. At the same time, and when it proved to be feasible, we tried to provide a sort of quantitative/statistical analysis of the responses so as to make the main results of each question easier to access and comment on.

Therefore, for some of the questions (1-2-3-5-10) a “yes”/“no” or “not possible to define” analysis was carried out. For some other questions (4-6-7-8-9), where this analysis could not be conducted, we tried to carry out what we might call a “trend analysis”. To be more precise, in addition to the qualitative analysis, we decided to classify each individual reply according to the following three categories:

- Category “No”: the reply denotes a general indication not to change or modify the system in place with regard to the specific issue explored through the question;
- Category “Yes”: the reply denotes a general indication to modify or change the system in place with regard to the specific issue explored through the question;
- Category “Unclear/Not possible to define”: the respondent does not take a clear position on the possibility to change the system in place.

We recognise that the results of this quantitative analysis will not reflect the richness of the replies. Nevertheless, we believe that such statistical analysis may provide a useful indication of stakeholders' general attitude with regards to a specific topic.

5. RESULTS

Here we illustrate the results of the open consultation. For each question, a summary table indicating the percentage of respondents - with a breakdown by the chosen six categories of stakeholders – is presented. Respondents' views – in terms of Yes/No/NotDefined – are synthetically reported in the same table for those questions where this classification was possible (this is the case of question 1-2-3-5-10). The percentages for this classification refer only to those respondents who actually provided a reply to the question.

In order to provide the reader with the same background information respondents could find in the consultation document, the introductory paragraphs for each section of questions are provided in italics.

A. Avoidance of the creation of new technical barriers to trade for products and services in the internal market

The emergence of national service standards and alternative standardisation documents (like Publically Available Specifications) developed by National Standards Organisations (NSO) constitutes a risk of technical barriers to trade within the internal market. Since the 80's, the Commission and the standardisation bodies (ESOs and NSOs) shall be informed – in the field of products - of the new subjects for which NSOs have decided, by including them in their standards programme to prepare or amend a standard. The same procedure could be envisaged for national programmes of service standards (including process standards) and alternative standardisation documents.

1. Do you think that service standards (including process standards) and alternative standardisation documents should be included in the scope of Directive 98/34/EC or its successor?

Services standards (including process standards) in the scope of Directive 98/34/EC or its successor:

	Number of responses	% on total	% Yes	% No	% ND*
All	411	85%	74%	20%	6%
Citizens	51	75%	86%	10%	4%
Companies	140	89%	75%	20%	5%
ESOs & NSBs	29	100%	97%	0%	3%
Industry associations	137	85%	63%	33%	4%
Organisations of public interest	15	88%	47%	20%	33%
Public authorities	32	82%	97%	0%	3%

*not possible to define

Alternative standardisation documents in the scope of Directive 98/34/EC or its successor:

	Number of responses	% on total	% Yes	% No	% ND*
All	411	85%	31%	61%	8%
Citizens	51	75%	37%	59%	4%
Companies	140	89%	41%	54%	5%
ESOs & NSBs	29	100%	28%	48%	24%
Industry associations	137	85%	26%	69%	5%
Organisations of public interest	15	88%	13%	80%	7%
Public authorities	32	82%	19%	75%	6%

*not possible to define

As the two tables above clearly show, respondents have generally split this question into two separate ones.

On the one hand, most respondents are in favour of including service standards in the scope of Directive 98/34/EC or its possible successors. This is true for all the six categories of stakeholders and also for those 19 companies that registered as SMEs (75% is the percentage of “Yes” in their case, with just 19% of “No” replies).

On the other hand, 61% of respondents are against the inclusion of alternative standardisation documents. Actually, among all the categories, there is a general concern that these documents are the result of a process which does not reflect the views and opinions of all the relevant stakeholders. A more positive attitude towards the inclusion of alternative standardisation documents can be seen in the case of companies and industry associations working in the ICT field.

2. Are you aware of specific cases where national service standards and alternative standardisation documents have caused technical barriers to trade?

	Number of responses	% on total	% Yes	% No	% ND*
All	401	83%	12%	75%	13%
Citizens	51	75%	8%	82%	10%
Companies	139	88%	9%	82%	9%
ESOs & NSBs	28	97%	25%	71%	4%
Industry associations	132	81%	11%	73%	16%
Organisations of public interest	14	82%	14%	86%	0%
Public authorities	31	79%	35%	35%	30%

*not possible to define

Three quarters of respondents are not aware of any specific cases where national service standards and alternative standardisation documents have caused technical barriers to trade. A difference must be pointed out in the case of public authorities, where replies are equally split among those respondents who are aware of specific cases and those who are not.

The cases of technical barriers mentioned in the replies have to do, *inter alia*, with integration requirements for migrant workers, interoperability in the railway domain, medical equipments and technologies, education of sport trainers and planning and building-related activities in

the construction sector. The fields of tourism, e-government, e-health and labelling are also mentioned.

It must be said that, in some of the “No” replies, while replying that they are not aware of specific barriers due to existing national standards and/or standardisation documents, some stakeholders point out that the lack of harmonised standards does represent an impediment to the effective provision of a specific service. For instance, some concerns are raised about ticketing and booking procedures for cross-border transportation of passengers in the railway sector.

B. Adaptation of the European standardisation system to the rapid evolution of technologies

The traditional standardisation process lasts an average of 1 to 3 years. This pace very often does not correspond to the speed with which new technologies are developed, and some sectors have been reluctant to ask the standards organisations to develop standards, even if such standards would have contributed to extend their market or rationalise their processes. Others, especially the ICT sector, have developed interoperability specifications in fora and consortia, outside the ESOs as described in the Commission White Paper – Modernising ICT standardisation in the EU – the Way Forward. However, neither the current legal framework of European standardisation (Decision 87/95/EEC), nor the rules on public procurement allow referencing of such fora and consortia specifications in regulations of public policies.

3. For areas other than Information and Communication Technology (ICT), should it be possible to refer to documents developed by fora and consortia in legislation and public policies? If it should, how should it be implemented?

	Number of responses	% on total	% Yes	% No	% ND*
All	421	87%	13%	83%	4%
Citizens	52	76%	6%	87%	7%
Companies	146	92%	13%	84%	3%
ESOs & NSBs	29	100%	10%	90%	0%
Industry associations	143	88%	15%	81%	4%
Organisations of public interest	13	76%	38%	62%	0%
Public authorities	32	82%	9%	81%	10%

*not possible to define

As it clearly emerges from the table, the large majority of respondents are against the possibility to refer to the documents developed by fora and consortia in legislation and public policies. This is true also for the sub-category of the 19 SMEs, where the percentage of “No” replies is equal to 94%.

Respondents recognise that these documents are already part of ICT standardisation and they generally say that they understand this inclusion because of the peculiarities of the sector. However, they oppose to having this option in the case of standardisation in general. Respondents explain their opposition by referring to the nature of the actors which produce these documents and to the procedures these actors follow in the standards development process. In particular, responses tend to highlight the following potentially problematic issues:

the small number of stakeholders involved in these fora and consortia, and the limited transparency of the internal processes and procedures. According to stakeholders, one of the risks is the official recognition of the decisions made by a small number of highly influential actors.

The issues of transparency and limited stakeholder involvement are mentioned also in many of the replies which are in favour of this inclusion. Actually, the conformity to conditions of transparency and openness is often indicated as the key implementation requirement.

In general, we observe that respondents appear quite open to the possibility of using these documents as a starting point for discussions in the standardisation processes within officially recognised standards development bodies.

Finally, it must be said that many positive replies to this question tend to come from companies and associations working in the ICT domain. This can be easily understood since the inclusion of documents developed by fora and consortia is already accepted as required for ICT standardisation.

4. How could ESOs and NSOs be encouraged to accelerate their standards development process? Should for example the Community financing for standardisation be subject to conditions in terms of speed of delivery whilst maintaining the openness of the process?

	Number of responses	% on total
All	416	86%
Citizens	50	74%
Companies	144	91%
ESOs & NSBs	29	100%
Industry associations	143	88%
Organisations of public interest	13	76%
Public authorities	31	79%

The analysis of the main trends shows that 86% of respondents do not wish to have the Community’s financing of standardisation subject to conditions of speed of delivery. This is true for each one of our six categories of stakeholders (80% of citizens; 92% of companies; 84% of industry associations; 65% of public authorities; 90% of European and national standards bodies and 92% of public interest organisations) and for the 19 SMEs as well (in this case, the percentage of replies indicating an opposition is even equal to 100%).

There is a general tendency to perceive the time needed for the standard-setting and definition process as reasonable in most cases. Increasing the speed is often perceived as having a negative impact on the quality of the outcome of the process itself.

If, however, a need emerges to further speed up the process, respondents say that possible speed-related conditions in Community financing would not improve the situation. As an alternative, they suggest increasing the use of IT solutions in the working methods, tools and processes of National and European Standards Bodies. Some replies also suggest concentrating resources and efforts only on the development of those standards which are relevant for market players.

C. Adaptation of the European standardisation system to new markets and societal challenges

European standardisation has been developed on the model of the international standards organisations, to contribute to rationalisation of production, growth of labour productivity, opening of markets and safety of products. Globalisation, new global challenges, “Better regulation” public policies, new societal demands as well as a growing share of services in the global economy and the boosting of innovation to resolve the current economic crisis request standardisation to adapt its traditional structures.

Standards remain voluntary instruments. Their effect depends on their credibility and of the level of consensus that they represent. The current diversification of the use of standards requires a broadening of the range of partners involved in the standardisation process, therefore more openness, transparency and balanced representation.

Standards facilitate global trade and access to markets. Standards need to be accessible for all users, and the availability of translations of standards can help disseminate new technologies.

5. Should the WTO principles of transparency, openness, impartiality, consensus, efficiency, relevance and consistency¹ be integrated in the legal framework of European standardisation (especially in EU Directive 98/34/EC or in its successor)? How should this be implemented?

	Number of responses	% on total	% Yes	% No	% ND*
All	415	86%	32%	54%	14%
Citizens	50	74%	16%	74%	10%
Companies	143	91%	17%	61%	22%
ESOs & NSBs	29	100%	31%	48%	21%
Industry associations	140	86%	39%	51%	10%
Organisations of public interest	14	82%	79%	14%	7%
Public authorities	33	85%	61%	27%	12%

*not possible to define

It can be observed that more than half of the respondents are against the integration of WTO principles of transparency; openness, impartiality, consensus, efficiency, relevance and consistency in the legal framework of European standardisation (the same trend can be observed in the case of the 19 SMEs, where the percentage of “Nos” amounts to 82%). Respondents tend to say that these principles are already followed and adopted by standards bodies at both national and European level. The explicit inclusion of these principles within European legislative documents – respondents indicate - would just lead to a multiplication of the numbers of actors involved in the European standardisation system and to the consequent official recognition of documents elaborated by organisms like fora and consortia. As it was already observed, the activity of these actors and the documents they produce is generally criticised for a lack of transparency, openness and balanced representation.

¹ As approved in the Decision of the Committee on principles for the development of international standards, guides and recommendations with relation to article 2, 5 and annex 3 of the WTO/TBT Agreement (G/TBT1/rev.8 23 may 2002)

It can be observed that percentages are different in the case of public authorities and NGOs/environment/consumer/public interest organisations. However, this difference can be explained by the fact that these categories of respondents appear to be more focused on the relevance of these principle in itself and are therefore mainly in favour of their explicit inclusion in legislation documents.

6. How could the participation of Consumers’ organisations, NGOs, Trade Unions and social partners, and SMEs be best promoted? What should be the role of public authorities (European Commission and Member States) in supporting such a participation in a transparent, open, impartial, consensual, efficient, relevant and consistent European standardisation system?

	Number of responses	% on total
All	418	87%
Citizens	49	72%
Companies	143	91%
ESOs & NSBs	29	100%
Industry associations	144	89%
Organisations of public interest	15	88%
Public authorities	32	82%

The analysis of the main trends shows that 69% of respondents declare that, even if the national delegation principle is already guaranteeing a good level of involvement, the participation of consumer organisations, environmental NGOs, trade unions and social partners, and SMEs within standardisation bodies and committees should be further promoted. This is true for 78% of citizens; 58% of companies and 65% of industry associations. The majority of public authorities (97 %) European and national standards bodies (90%) and in the case of NGOs/environment/consumer/public interest organisations (93%). are in favour of further participation , Favourable replies are the majority (71%) also in the case of the 19 SMEs. In the case of SMEs, this percentage may look lower than expected. This is probably due to the fact that some SMEs have reported the opinion of the industry associations they are part of, and, as figures show, industry associations tend to be already quite satisfied with the current level of stakeholder participation.

Financial support to participation by public authorities, reduced membership and participation fees and awareness raising initiatives are the most frequently suggested solutions in order to better promote the participation of consumer organisations, NGOs, trade unions and social partners, and SMEs. Stakeholders also suggest modifying the voting procedures within standardisation bodies in order to further stimulate the setting-up of mixed groups. A revision of the list of participants aiming at a further inclusion of the under-represented actors of the civil society, an increased use of IT tools and technologies and a comparison of best practice experiences in Europe are also suggested.

It must also be said that a minority of respondents (large companies, mainly) are against the option of financially supporting the less represented stakeholders, since this could be viewed as a discriminating measure in relation to other actors.

7. How could the national standardisation organisations deepen their cooperation, and mutualise their activities? Could the following tasks be shared amongst several national standards organisations?

- e) Management of the Secretariats of Technical Committees
- f) Notification of new national standardisation projects
- g) Promotion/Sales of standards
- h) Other?

	Number of responses	% on total
All	383	79%
Citizens	49	72%
Companies	137	87%
ESOs & NSBs	29	100%
Industry associations	126	78%
Organisations of public interest	5	29%
Public authorities	32	82%

The analysis of the main trends shows that three quarters of respondents (75%) are opposed to changes with regards to the current level of cooperation among the NSOs. Favourable replies are only 12% in the case of citizens; 8% for companies; 10% for industry associations; 13% for public authorities; 3% for European and national standards bodies and 20% for public interest organisations). This is true for the 19 SMEs as well, where 76% declare to be satisfied with the situation as it is.

In order to understand this “negative” attitude from respondents, two things must be highlighted.

First, respondents in general declare that the level of cooperation among NSOs has already improved a lot. They also tend to affirm that the options suggested within the questions are already in place.

Second, many stakeholders fear that the way the question is formulated indirectly supports - or encourages to support - the establishment of a Brussels-based form of control (even in the form of a single European standardisation body) of the standardisation process. In the eyes of these respondents, a Brussels-based form of control would generate more bureaucracy, costs, and might undermine the independence of standardisation actors. These concerns explain why many replies stress the importance of the national delegation principle and call for the preservation of the private-public partnership nature of the current standardisation system.

8. Without prejudice to the national delegation principle, how could the European Standards Organisations manage directly, on a case by case basis, some standardisation activities, especially some Technical Committees?

	Number of responses	% on total
All	394	82%
Citizens	50	74%
Companies	138	87%
ESOs & NSBs	29	100%
Industry associations	132	81%
Organisations of public interest	11	65%
Public authorities	28	72%

The analysis of the main trends shows that about three quarters of respondents (76%) are opposed to the idea of having European Standards Organisations to manage directly, on a case by case basis, some standardisation activities, especially some Technical Committees. The percentage of in-favour replies is just 6% in the case of citizens; 22% for companies; 10% for industry associations; 4% for public authorities; 7% for European and national standards bodies and 36% - slightly higher than the average - for public interest organisations). This is true also in the case of the 19 SMEs as well, where no one declared to be in favour of this change.

As it was the case for question No. 7 as well, the fear of a potentially strong interference of Brussels-based authorities in the European standardisation process, and a consequent potential prejudice to the national delegation principle, justifies this opposition by respondents.

9. What support should the European Commission provide to facilitate the use of European standards as a means to open global markets? What would be the operational means that the Commission should use? (Support experts' participation in international standardisation activities, translation of European standards into extra-community languages?)

	Number of responses	% on total
All	397	82%
Citizens	51	75%
Companies	142	90%
ESOs & NSBs	29	100%
Industry associations	124	77%
Organisations of public interest	14	82%
Public authorities	32	82%

Respondents tend to suggest the following measures in order to facilitate the use of European standards as a means to open global markets: supporting, also in financial terms, the participation of European experts in the international standardisation activities; promoting the use of European standards in international trade agreements and in the working groups of

international trade organisations, and providing the translation of European standards into non-EU languages. With regards to this last measure, it must be said that a minority of stakeholders are opposed to it, since they believe that the English version is sufficient to be used in international activities and that the European Commission should focus on guaranteeing the translation of standards in all of the community languages.

10. Under which conditions do you think that the European Commission could launch, on a case by case basis, calls for tenders, open to the ESOs and to other organisations, to develop standards supporting EU policies and legislation?

	Number of responses	% on total	% Yes	% No	% ND*
All	408	84%	10%	83%	7%
Citizens	49	72%	4%	86%	10%
Companies	143	91%	8%	86%	6%
ESOs & NSBs	29	100%	0%	79%	21%
Industry associations	138	85%	13%	83%	4%
Organisations of public interest	13	76%	46%	46%	8%
Public authorities	30	77%	10%	83%	7%

*not possible to define

The analysis of the main trends shows that 83% of respondents are against the launch, on a case by case basis, of calls for tenders open to European Standards Bodies and other organisations aiming at developing standards in support to EU policies and legislation. This is true for all categories of stakeholders (86% in the case of citizens and companies; 82% in the case of SMEs; 83% of industry associations and public authorities; 79% in the case of European and national standards bodies), with the exception of public interest organisations, where both negative and positive replies score the same (46%).

As it was the case for questions 1, 3 and 5, once again concerns regarding a potential increase in the number of actors involved in the European standardisation process and that these new actors (fora and consortia.) may not guarantee transparency and openness are the main reasons explaining this strong opposition.

These concerns are reflected also in the case of the favourable replies, where it is strongly highlighted that every potential contractor resulting from these calls must strictly assure a balanced and transparent consultation process.

11. What is, in your views, the most efficient level of participation in the process of Standards Development: National, European or International?

	Number of responses	% on total
All	416	86%
Citizens	49	72%
Companies	143	91%
ESOs & NSBs	29	100%
Industry associations	142	88%
Organisations of public interest	15	88%
Public authorities	32	82%

The analysis of the replies shows that there is a general tendency not to indicate a preference among the national, the European and the international standardisation level in terms of efficiency. All levels are seen as equally important and their efficiency is perceived as depending on the circumstances and factors which are taken into account.

At a general level, it is worth underlining that many respondents, even if they decided not to select it as the most efficient level of participation, took advantage of this question to strongly defend the important role of the national standardisation level. This level is seen as the one where the standardisation process really starts and where all the actors, even the small ones, are involved and can exert their influence.

Finally, in the case of those replies where a clear preference is expressed, we can observe some interesting relations between the preferred level of standardisation and the business sector one stakeholder is involved: for instance, operators of the construction sector tend to select the European level as the most efficient one, whereas this preference goes to the global level for respondents operating in the ICT sector.

12. In your opinion, is where is the major added value in European standardisation with respect to national standardisation?"

	Number of responses	% on total
All	406	84%
Citizens	47	69%
Companies	140	89%
ESOs & NSBs	29	100%
Industry associations	138	85%
Organisations of public interest	14	82%
Public authorities	32	82%

From the replies that were collected, it emerges that the development of harmonised standards, the removal of trade barriers and the creation of a single market do represent by far the major added value of European standardisation. Companies and industry associations in particular benefit from a reduction of transaction costs, an increased level of interoperability and the development of a common technical language within the European market.

D. Cost of standards

The costs of purchasing standards have been identified as an important barrier to their use, especially by SMEs. Purchasing a full collection of standards is sometimes necessary to answer a call for tender, access specific markets or take full advantage of the benefits of the “New Approach” regulation. Some stakeholders consider that the price of standards – different in every National Standards Organisations - is too high with respect to their function of public interest.

13. What are, in your views, the most serious barriers to the use of standards by enterprises: costs of standards (purchasing price)? Costs of operational implementation? Access to information? Knowledge of existing standards?²

	Number of responses	% on total
All	411	85%
Citizens	51	75%
Companies	145	92%
ESOs & NSBs	26	90%
Industry associations	143	88%
Organisations of public interest	8	47%
Public authorities	32	82%

The replies indicate that the *lack of knowledge and awareness* about both the importance of the standardisation process and the content and field of application of standards themselves represent the most serious barrier to the use of standards. Stakeholders generally complain about the difficulty to access information about which standards to apply, the complexity of the technical language used, and the large amount of standards (and updates) that may concern one specific product.

Both the difficulty to access information and the complexity of the technical language contribute to make *implementation costs* another key barrier to the application of standards. Stakeholders declare that some training would be needed in order to help market players, above all the smaller ones, access the information concerning standards and understand which specific regulations directly concern the products they are producing and selling.

Although *price of standards* – in a draft classification of the most recurrent issues raised by respondents – ranks third after *lack of knowledge and awareness* and *implementation costs*, it does emerge as another major barrier to the use of standards. The price is perceived as too high, above all by smaller operators. However, it must be pointed out that it is not the price itself that appears to represent the key issue. Actually, the problem is that for a specific product more than one standard is needed and previews of standards do not often provide buyers with a clear idea of the relevance of a specific standards for their needs (in other words, they may find themselves ending up buying standards they do not really need). Furthermore, the compliance with standards is sometimes not a voluntary choice but it is *de facto* a mandatory one. Therefore, actors do not have any other option but to buy standards. Always with regards to price of standards, many respondents have the feeling they are paying for standards twice: firstly, they actually need to pay to be involved in the standardisation process; secondly, they need to pay to buy the outcome of the process they have been directly involved in.

Finally, respondents complain about the sometimes huge differences in the prices of the same standards among the different National Standards Bodies and the fact that they can not choose where to make their purchase.

² These barriers have been identified in the Study « Access to Standardisation » - EIM March 2009, commissioned by the European Commission

14. What could the standards organisations do, in addition to their current practice, to facilitate the access to standards, especially by SMEs?

	Number of responses	% on total
All	394	82%
Citizens	43	63%
Companies	140	89%
ESOs & NSBs	27	93%
Industry associations	139	86%
Organisations of public interest	7	41%
Public authorities	32	82%

It can be observed that respondents generally took advantage of this question to put forward their solutions to the issues raised in question No. 13.

Concerning *lack of knowledge and awareness*, respondents suggest to increase the communication efforts to promote the importance of standards and to illustrate the benefits these voluntary standards generate for a company. Standards bodies are also invited to adopt a more common technical language, to provide more user-friendly summaries and to make use of IT technologies and solutions (eg., simple email alerts) in order to keep market players up-to-date with the newly developed standards. Respondents also suggest emphasising the importance of standards and standardisation in general in education programmes and seminars.

In order to reduce *implementation costs*, different measures are recommended: further investments in training and workshops (with the support of industry and trade associations), the provision of guidelines in the different national languages and the adoption of a user-friendlier language in the editing of standards.

As far as price of standards is concerned, many respondents observe that standards should be ideally available for free. At the same time, they are also aware that the sale of standards is a paramount element of standards bodies' business model. Therefore, some "softer" measures are suggested in order to successfully deal with this issue:

- free availability of mandatory standards reduced price when bundles/packages of standards are bought;
- free availability of the main content of each standard for web consultation only;
- free summaries in local languages so as to limit the risk for companies to purchase standards they do not need;
- specific cooperation agreements with associations of SMEs aiming at making standards available at a cheaper price for this category of market players.

The European Commission and public authorities in general are asked to give financial contributions to every measure going in the direction of making standards less expensive for companies and users in general.

Always with regards to the price of standards, two standards bodies – DIN and DKE – are often mentioned as examples to be followed. Respondents declare to be particularly satisfied with some initiatives undertaken by these two organisms, like the provision of free summaries in the local language and the sale of bundles of standards at a reduced price.