Summary of Discussions at the
6th Integrated Product Policy Expert Workshop

Standardisation and New Approach

Brussels, 18th June 2001
1. BACKGROUND INFORMATION ON THE EXPERT WORKSHOPS

Following the adoption of the Green Paper on Integrated Product Policy (IPP) in February 2001 the European Commission embarked upon a stakeholder consultation exercise, which will finish on 30th June 2001. In addition to welcoming written comments on the Green Paper the Commission has organised a series of meetings, the first of which was the Conference to launch the stakeholder debate on the 8th and 9th of March 2001.

The Commission has also organised seven small expert workshops on particular aspects of IPP. The aim of these workshops was to inform the Commission about particular aspects of IPP to help the Commission in framing its ideas for the forthcoming follow-up Communication on IPP. Participants were invited to apply and around ten were selected on the basis of their expertise and experience. The Commission is aware that with such a small number of participants it will not be able to canvass all experiences and opinions represented. For this reason the input from such meetings is seen as being just a part of the stakeholder consultation process.

This document represents a summary of the discussions at the workshop. There was no attempt to reach conclusions or consensus and the fact that a particular viewpoint was expressed at the meeting without being contested does not necessarily mean that the Commission accepts it.

2. BACKGROUND TO THIS WORKSHOP

The discussions at the Integrated Product Policy (IPP) Conference on the 8th and 9th of March showed the existence of a number of initiatives and actions in the field of standardisation which could provide a useful input to the Communication/White Paper planned for the second half of 2001. Similarly, there is considerable experience on the application of the New Approach which could be used as background for the further planning of initiatives under the IPP framework.

The Commission therefore invited a number of experienced experts to this workshop in order to obtain a fuller picture of existing initiatives and available information.

3. PARTICIPANTS

Philip Bennett (Council of European Producers of Materials for Construction)

Frank Bill (DI - Confederation of Danish Industries, ORGALIME)

Sandra Callagan (European Commission, DG Enterprise)

---

1 For more background information, please consult the report of the 8/9 March workshop at [http://europa.eu.int/comm/environment/ipp/conference/conference.htm](http://europa.eu.int/comm/environment/ipp/conference/conference.htm), in particular the report of the working group on standardisation and the New Approach.
Per Dofnas (Ericsson and EICTA – European Information and Communications Technology Industry Association)

Franz Fiala (ANEC – European Association for Consumer Participation in Standardisation)

Klaus Lehmann (DIN – German Institute for Standardisation)

Gerhard Leibrock (European Commission, DG Enterprise)

Otto Linher (European Commission, DG Environment)

Karin Öberg (Swedish Environment Protection Agency)²

Pia Olsen (Danish Society for Conservation of Nature)

Michail Papadoyannakis (European Commission, DG Enterprise)

Hugues Plissart (CEN – European Committee for Standardisation)

Harald Riekeles (CEN – European Committee for Standardisation, sector Machinery)

Erica Rydhström (European Commission, DG Environment)

John Swift (SCA Packaging)

Karola Taschner (EEB – European Environmental Bureau)

4. STANDARDISATION AND ENVIRONMENT HELP DESKS

Mr Lehmann reported on his experiences with the national environment help desk in Germany. He said that it is crucial to obtain a good flow of information between environmental experts and stakeholders on one side and standardisation on the other side. In this process, there is a high degree of need for expertise which can mainly be found within industry and academia. There are, however, no experts in all fields. 80% of standardisation is today European and international standardisation. This needs to take into account that views on environmental issues differ from country to country. Therefore, the expertise needs to be pooled and properly funded. It should involve experts from the different countries.

In order to obtain a smooth information flow, guidelines need to be followed in the communication between experts and the standardisation process. They could be inspired by the guidelines such as the ones published on the following site: http://www.cenorm.be/boss/supmat/guidance/gd050.htm. Communication should involve environmental groups but reliance on such groups is insufficient to guarantee an effective integration of environmental issues into standardisation. Standardisation in the field of environment can only function if there is a clear

² Council Presidency observer
distinction between political and technical issues. Only the latter should be reflected in mandates for standardisation.

In Germany, the national environmental help desk consists of a secretariat and a steering board. Stakeholders are being informed regularly via newsletters on standardisation activities with relevance to the environment. Experts from NGOs and universities are invited (and frequently paid) to take part in the standardisation process and to report back to the help desk. 75% of the activities of the help desk are paid for by government and 25% by DIN.

He thought that an appropriate “carrot and stick” approach could enhance the take up of environmental issues into standardisation and a framework directive might be one idea to be considered. He agreed on the need for improvement in the integration of environmental issues in many sectors. It should, however, also be recognised that this works very well in other sectors, e.g. in medical products.

Mrs Taschner reported on the experiences made while working as a representative of the European Environmental Bureau who has an observer status in CEN: Environmental interests are always in a minority position. Therefore it is the more frustrating to observe that decisions are often not consensus based but are taken by vote. This results in not looking for compromises but in the cutting off of all environmental concerns. National standard institutes are often represented by representatives of industry. It even happens that a transnational company succeeds in having their representatives been nominated spokesmen for more than one national standard institute.

The EEB has suspended its observer status a year ago. Meanwhile it has founded the “European Environmental Citizens’ Organisation for Standardisation” (ECOS) jointly with WWF-European Policy Office, Friends of the Earth Europe, Birdlife International and one Danish and one French environmental NGO. This organisation wants to make a fresh start and is keen to participate in standardisation work directly and actively at all levels if funding is made available by the EU Commission.

However important participation of all interested parties in standardisation may be, she said, it was also necessary to have the legislation in place because technical committees are not bound to respect the environment without it. She stated that safety issues had successfully been taken on board in the standardisation process but that she could not see any progress on environmental issues in the past ten years. In her view, this is the result of civil liability legislation in place for product safety but not for the environment. Integration of environmental issues in standardisation therefore needs to be backed up by legislation defining general demands and “cut-off” criteria. There needs to be a clear separation of political issues which should be dealt with by the Community legislator and technical issues which can be left to standardisation. The currently unsatisfactory situation is due to excessive lobbying which prevents the political actors to set proper benchmarks in Directives. The environment help desk was no solution to the deficiencies in the integration of environmental issues into standardisation, as the comments usually arrived too late, were too limited and sometimes irrelevant.

Mr Fiala underlined the difference in available resources between industry and environmental and consumer groups. This imbalance threatens to increase even
further as funding was cancelled in many countries. In order to give a useful contribution, meetings also need to be properly prepared. Therefore, only a limited number of priorities can be managed to ensure that the environmental state of art is reflected in product standards. A typical experience was the work on gas appliances where levels of emissions were accepted in the standards which are far beyond what is technically feasible and required in many countries. Voluntary approaches alone are insufficient in this context. There should be a legal background to standardisation and a reform of the New Approach and the environment.

In his opinion the Environmental helpdesk is not a suitable instrument to ensure the achievement of a high level of protection in European standards. So far most its output was of limited substance and its real impact negligible. Many comments have focused on small details rather than the big issues. Under the given terms of reference significant improvements are unlikely to occur. However, he recognised the function of the EHD in advertising for the environment.

Mr Bill underlined the need to make technical experts aware of environmental issues. This should be done on all levels. In Denmark, the Environment Agency makes a screening of all standards. All relevant issues, including mandates, are discussed in an environmental committee involving all stakeholders. Environmental product standards could be inspired by environmental management systems.

Mrs Olsen reported on a Danish project on the involvement of environmental NGOs in the standardisation process. This project is mainly financed by the Danish environment ministry with a contribution from the Danish Society for Conservation of Nature. In this framework, ways how to best participate in standardisation have been developed. To ensure best use of human resources, prioritisation is needed. Such priorities are also participation in various Committees such as the Committee on Danish Standards and BAT Committees, but also in important international events such as the Kuala Lumpur conference. Technical experts in the standardisation bodies are not always familiar with environmental issues. The DS education programme for technical experts is a good way to increase the awareness on environmental issues. It is questionable whether it is possible to clearly separate political and technical issues. In Denmark, when political issues come up in the standardisation process, they are referred to the Environment Protection Agency. She also referred to many misunderstandings in the public about the CE mark.

The Environment Help Desk is an interesting instrument but can only be one of many instruments to ensure the integration of environmental concerns into standardisation. It is limited to two persons and the comments arrive frequently too late to achieve more fundamental changes in standards. She also supported the idea of a framework directive on standardisation and the environment.

Mr Riekeles felt that the integration of environmental aspects at the workplace in standardisation of the machinery safety sector worked relatively smoothly. This helped the approximation of requirements within the EU. Even setting emission levels on hazardous substances was a task that was successfully tackled in many instances. There is participation of various actors, including authorities and users. Everybody is invited to comment.
Regarding the Environmental Help Desk there is maybe more need for an information switchboard than a special treatment for environmental stakeholders. He recognised a resource problem for some actors but this would also apply to other actors such as SMEs. In standardisation, consensus should be the goal and voting should be avoided.

Mr. Plissart described the function of the CEN environment help desk. The help desk should properly reflect geographical areas. This is not always easy due to different traditions in various countries. Funding is still ensured from one country only. Most recently, the help desk has now been continued after its initial test phase. It can now comment on any work item at all stages. It should raise awareness on environmental issues in all Technical Committees. The help desk should also use an extensive network of experts.

Mr. Swift underlined the appropriateness of standardisation also for environmental purposes. This should not be limited to pure test methods. It is essential, though, to disentangle political and technical issues.

5. **THE NEW APPROACH**

Mr. Bennett reported on the experiences with the New Approach in the Construction Products Directive. Among the six essential requirements for construction works, one relates to health, hygiene and the environment covering such issues as toxic gases, radiation and water & soil pollution.

It is not easy to integrate environmental aspects into construction product standards, because the Directive only covers the indoor environment and the immediate vicinity of the construction works and not the environment in its wider ecological sense. Furthermore, the Directive applies to the construction products only in the installation and use phase of the construction works.

For these reasons, plus the fact that CEN construction technical committees are under tremendous pressure to speed up completion of over 600 harmonised standards, progress has been slow in developing a construction sector version of the CEN Environmental Guidelines. However, under a pilot project, three technical committees are now developing environmental checklists for aspects to be addressed in standards. Their work will be used as examples for other construction sector technical committees.

These three product families were chosen because they each have expertise in developing life cycle based environmental information. The experts involved have usually gained their experience by submitting their products to ISO Type III environmental declaration schemes for construction products which exist in several EU countries.

The construction product industry is now looking at ways of harmonising these different national schemes. It would be much simpler, particularly for SMEs, to have a single environmental declaration for the whole internal market.
Mr Riekeles reported about the success story of the New Approach in the field of Machinery safety, where until March 2001 about 250 Harmonised ENs are listed in the OJEC, giving presumption of conformity. The sector has also successfully proved how to deal with so far 12 safeguard actions on published and even still not finished standards. Outside his sector he alluded to bad experiences with the use of interpretative documents to the CPD, causing extensive delays in standardisation.

Mrs Taschner stated the need for new and clear essential requirements on the environment. She expressed criticism on management standards as they leave too much room for interpretation and do not provide criteria for surveillance.

Mrs Olsen stated that, in the context of standard development for New Approach directives, it is important that the Commission ensures the respect of the mandate.

Mr Dofnas underlined the good experiences with standardisation in the context of Electromagnetic Compatibility (EMC) Directive (89/336/EEC). The text of the essential requirements is very short, and in the beginning it was not clear to the standardisation people what the borderline between legal requirements and quality aspects was. The mandate did not provide enough clarity and this required discussions between technical people and political people. Only then, the full benefit of clarity of requirements could be achieved. This is a gradual process and now the EMC standardisation people have a much greater experience when preparing new standards. The New Approach needs to be completed by appropriate market surveillance which is a key element to make the system work. Taking companies to Court for not complying with the EMC directive brought a strong “waking up” effect to manufacturers in the early days of the EMC directive.

Mrs Callagan referred to the ongoing review of the New Approach which is expected to result in a Communication during the autumn in order to stimulate a wider consultation. A number of issues regarding the application of the New Approach and its implementation will be examined and proposals for improvements will be developed.

Mr Swift described the experiences with the New Approach in the context of the Packaging Directive. The work on these standards suffered both from varying interpretation of the essential requirements and difficulties resulting from the mandate given to CEN. The mandate did not provide the additional clarity needed to judge unambiguously whether the standards provided met that mandate. The drafting of the mandate is very crucial and more effort on this might have eased the standardisation process. Packaging is a very complex issue as it is never made for its own right but performs a function in relation to the packed product. This resulted in many discussions and some aspirations could not be fulfilled. It turned out that the standards had to be heavily oriented to an environmental management systems approach. In spite of much opposition, this may actually be the best workable approach.

Mr Fiala expressed his concern on the product oriented environmental management systems approach (POEMS). He referred to many misuses of ISO 9000/14000. If criteria are not properly applied, almost all products can be green. It would be more appropriate to use clear criteria such as eco-label criteria and baseline requirements. The New Approach with respect to environmental issues needs to be reformed with...
a view to a more flexible interface between standardisation and legislation. If no way can be found within standardisation, rules need to be set elsewhere. This could e.g. be done via a “standards monitoring system”. Safeguard clauses only at the end of the standardisation process were not very effective as actors are very reluctant to change approaches once substantial work has gone into a standard.

Mr Lehmann underlined the usefulness of environmental management systems such as the ones elaborated by ISO/TC 207.