



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Single Market Policy, Regulation and Implementation
Standards for Growth

Reporting template for European stakeholder organisations receiving funding in accordance with the EU Regulation No 1025/2012

Legal basis

Article 24

Reports

2. The European stakeholder organisations that received Union financing in accordance with this Regulation shall send an annual report on their activities to the Commission. This report shall contain in particular detailed information about the membership of these organisations and the activities referred to in Article 16.

Article 16

Financing of other European organisations by the Union

The financing by the Union may be granted to the European stakeholder organisations meeting the criteria set out in Annex III to this Regulation for the following activities:

(a) the functioning of these organisations and of their activities relating to European and international standardisation, including the processing of technical work and the provision of information to members and other interested parties;

(b) the provision of legal and technical expertise, including studies, in relation to assessment of the need for, and the development of, European standards and European standardisation deliverables and training of experts;

(c) the participation in the technical work with respect to the development and revision of European standards and European standardisation deliverables which is necessary and suitable for the support of Union legislation and policies;

(d) the promotion of European standards and European standardisation deliverables, and the information on, and use of, standards among interested parties, including SMEs and consumers.

Introduction

ANEC was established in Brussels in 1995 as a not-for-profit international association under Belgian law. In 2017, its budget was 1,44M€ and its Secretariat in Brussels employed a maximum of 9,5 FTEs.

The objective of the association is essentially scientific, namely to promote, defend and represent the interests of consumers with regard to the work of the European Standards Organisations and any other similar type of organisation involved with standards that affect directly or indirectly consumers.

In fulfilment of this objective, ANEC establishes consumer priorities in standardisation; comments on general European standardisation policy issues and their possible impact on consumers, putting forward recommendations to CEN, CENELEC, ETSI and (where applicable) other standardisation bodies and the European Institutions; adopts positions on proposals for directives involving standardisation and draws up proposals to ensure that Community legislation integrates issues relating to consumer protection and the promotion of consumer interests; makes available the necessary means to co-ordinate and improve consumer participation in the European standardisation process.

Membership

ANEC comprises full members (and observers where appropriate). The number of full members is not limited. The minimum required is three.

Only one representative natural person per Member State of the EU and EFTA may be a full member. The full member must have an interest in the objectives pursued by the association and is proposed as member for a period of 4 years by the national consumer organisations of his/her country. Full members (and their alternates where appointed) preferably have experience of the workings of the European standardisation process, and knowledge of issues relating to consumer protection and the promotion of consumer interests. Full members must be able to work in English.

The General Assembly may also admit - as full members - consumer representatives from other countries, whose national standardisation organisations are members of a European Standardisation Organisation (e.g. CEN, CENELEC).

On 31 December 2017, membership of the ANEC General Assembly was open to 34 countries (those holding full membership of CEN-CENELEC). These countries were the 28 EU Member States; Iceland, Norway & Switzerland from the EFTA countries; and FY Republic of Macedonia, Serbia & Turkey as potential accession countries to the EU. Its present four-year term ends in June 2019.

The General Assembly is assisted in its tasks by a Steering Committee comprising up to 9 members of the General Assembly, chaired by the ANEC President. One member

of the Committee must be drawn from the EFTA countries. Its present two-year term also ends in June 2019.

As well as deciding the mission, vision and strategic goals of the association, the General Assembly is responsible for creating (and disbanding) ANEC Working Groups that mirror the association's fields of technical activity (and any other structures).

In 2017, there were 7 fields of technical activity: Accessibility, Child Safety, Digital Society, Domestic Appliances, Services, Sustainability, and Traffic & Mobility. Experts in these Working Groups and Project Teams are from the member countries and are appointed in line with internal ANEC procedures.

Financing from the EU

In 2017, ANEC received one grant from the EU, totalling 1,37M€, under Framework Partnership Agreement 143/G/CONSUMER/ENTR/2014.

ANEC			Article 16 of REGULATION (EU) No 1025/2012			
			Activities of paragraph 16(a)	Activities of paragraph 16(b)	Activities of paragraph 16(c)	Activities of paragraph 16(d)
Type of grant	Amount	Maximum percentage of EU financing	Functioning of the organisation and of their activities relating to European and international standardisation, including the processing of technical work and the provision of information to members and other interested parties	Provision of legal and technical expertise, including studies, in relation to assessment of the need for, and the development of European standards and European standardisation deliverables and training of experts	Participation in the technical work with respect to the development and revision of European standards and European standardisation deliverables which is necessary and suitable for the support of Union legislation and policies	Promotion of European standards and European standardisation deliverables and the information on, and use of, standards among interested parties, including SMEs and consumers
Operating	1.368.810	95%	Yes	Yes	Yes	No
TOTAL	1.368.810					

Activities undertaken under financing received from EU

In 2017, ANEC used EU financing to support the activities of its experts appointed to the technical bodies of the European Standardisation Organisations, and infrastructure of Working Groups providing the briefing to these experts, including reimbursement of the real costs (travel, accommodation, and subsistence) of its volunteer experts.

This support included the provision of six training sessions and eleven webinars (e.g. sessions on drafting comments on specific standards, introductory sessions for new ANEC members, European Accessibility Act). A total of 237 participants attended the training sessions/webinars in 2017.

EU financing also supported the participation of experts in technical bodies of ISO or IEC, where this international work was deemed important to European consumers.

It also aided the ANEC Secretariat in its efforts to ensure consumer interests were reflected in legislative proposals linked to consumer protection and standards (e.g. the "Goods Package" on mutual recognition and market surveillance; the proposal for a cross-border parcel delivery regulation), as well as seeking to strengthen the legal frameworks for the safety of services and chemicals in products.

ANEC used the funding to participate in EC committees and expert groups - including Committee on Standards - commenting on the 2018 Annual Union Work Programme for European Standardisation and draft standardisation requests. In 2017, ANEC participated in the Joint Initiative on Standardisation (JIS) Steering Group meetings, and meetings under the Actions that ANEC is following: strengthening inclusiveness at the European (Action 9) and national (Action 10) levels; the need for research on societal (as well as economic) benefit of standards (Action 1), providing impetus in the development of standards for services (Action 12), and Action 15 on international standardisation. We monitor Action 8 on the development of European Standards.

ANEC decided to withdraw from Action 3 on education about standards as the sponsors decided to focus on education through universities and business schools, whereas ANEC had championed the training and qualification of Technical Committee officers, and an eLearning for consumers experts.

Finally, it allowed ANEC to commission three technical studies and one subcontract:

1. *Study to develop ANEC comments & proposals for the revision of several Parts 2 of IEC 60335 with respect to the safety of children, older persons, and persons with disabilities ('removal of the exclusion clause').*

The purpose of the study was to provide ANEC with (updated) proposals for the revision of the Parts 2 to IEC 60335. These need to be amended to include the provisions with respect to the safety of children, older persons and persons with disabilities now included in all relevant European Standards. An amendment to the contract, extending the study to 15 June 2018, was signed on 12 October 2017.

2. *Study on 'Cross-border healthcare services'.* The purpose of this technical study was to investigate the consumer experience of using healthcare services located in other European countries, with a view to informing standards work in this area

The final report (ANEC-TS-2017-SERV-008) was received on 4 December and was approved on 14 December 2017. It was agreed to publish the report early January 2018 on the ANEC website, with a press release and also a short leaflet about the key findings.

3. *Support to ANEC in pursuing alternative or diversified sources of funding.* A second contract was signed with the consultancy, Action Planning, further to a

new call for tender. The first deliverable, 'Diversification Action Plan' (ANEC-TS-2017-SC-006) was received on 1 September 2017 and endorsed by the ANEC Steering Committee at its meeting on 9 November. A second deliverable, a research report into the top 20 private trusts & foundations of relevance to ANEC (ANEC-TS-2017-SC-008), was received on 8 December and approved. The contract was amended to reflect its extension to the second deliverable (ANEC-TS-2017-SC-007).

4. *Sub-contract of an expert to represent ANEC in work on Enhanced Child Restraint Systems (car seats for children).* The expert continued to be the sole consumer representative in the development of the further phases of UNECE Regulation 129. The contract (ANEC-SECT-2017-001) was signed on 4 January 2017 between ANEC and Consumentenbond and the tasks were completed in line with the contract.

In response to the needs identified in the ANEC Work Programme 2017, 51 experts participated in 117 technical bodies of the European Standardisation Organisations, and a total of 131 meetings.

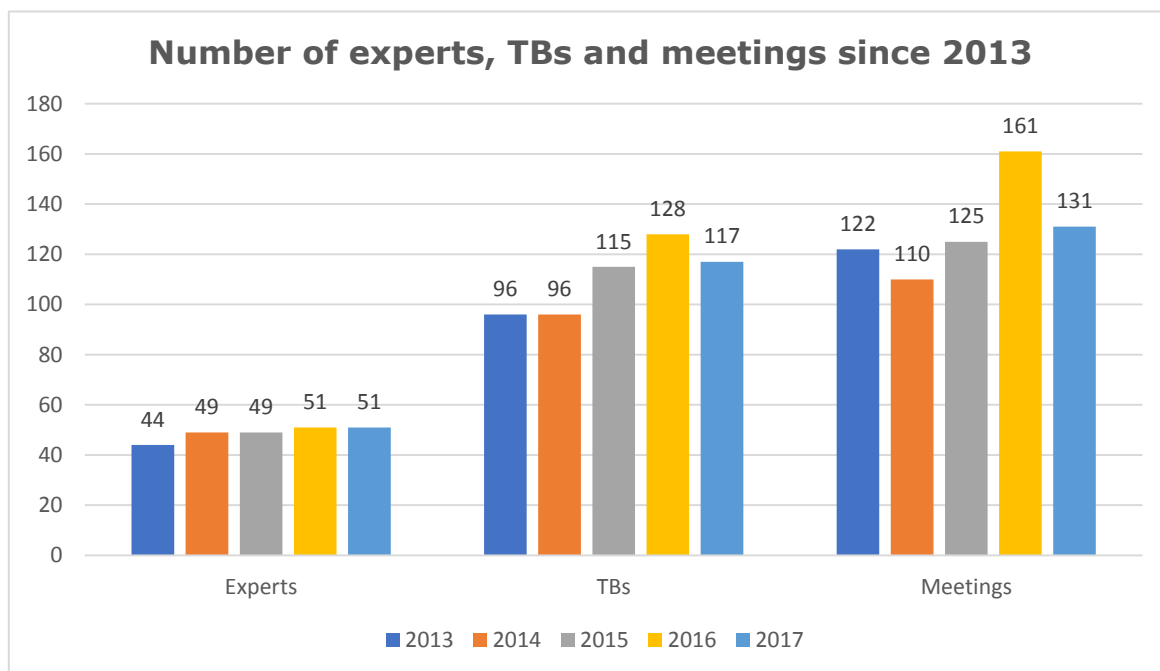


FIGURE 1 Comparison of number of experts, number of Technical Bodies (TBs) in which they were active, and number of meetings attended since 2013.

Separately, ANEC asked its experts in its fields of priority for technical comments & Opinions on draft European standards and/or new work items as follows: Accessibility 65 times; Child Safety 124 times; Digital Society 39 times; Domestic Appliances 48 times; Innovation 9; Services 24 times; Sustainability 16 times, Traffic & Mobility 18 times, and Horizontal 5. These comments were collated and submitted to the ESOs.

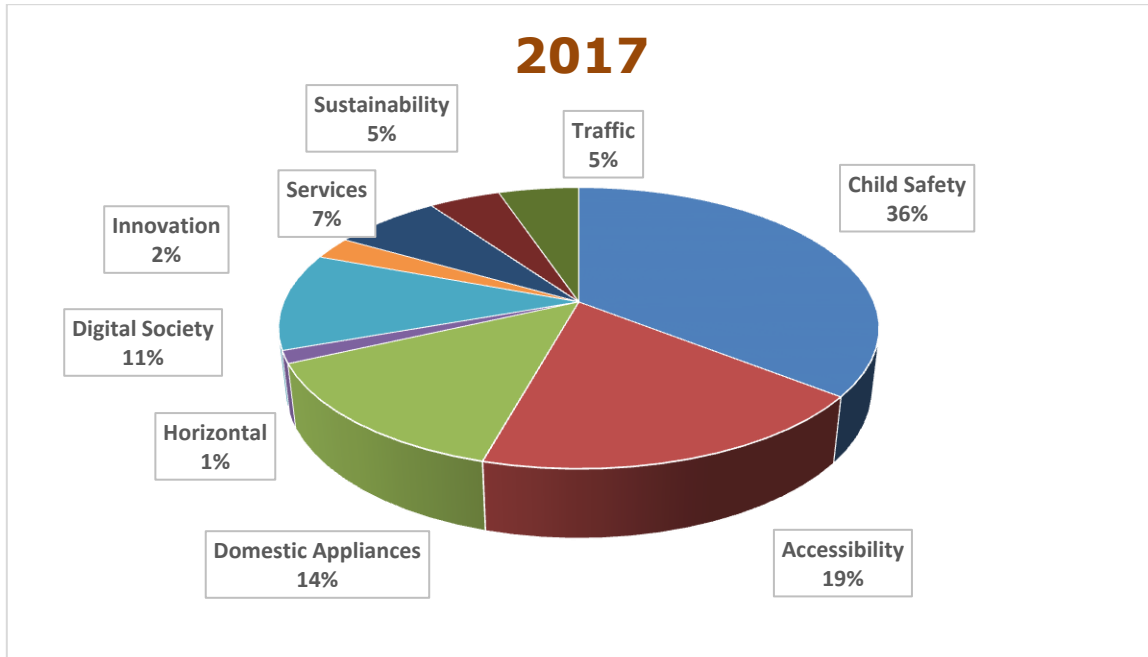


FIGURE 2 Frequency of consultation of experts on technical comments and Opinions on draft European standards and/or new items followed in 2017 (% of total).

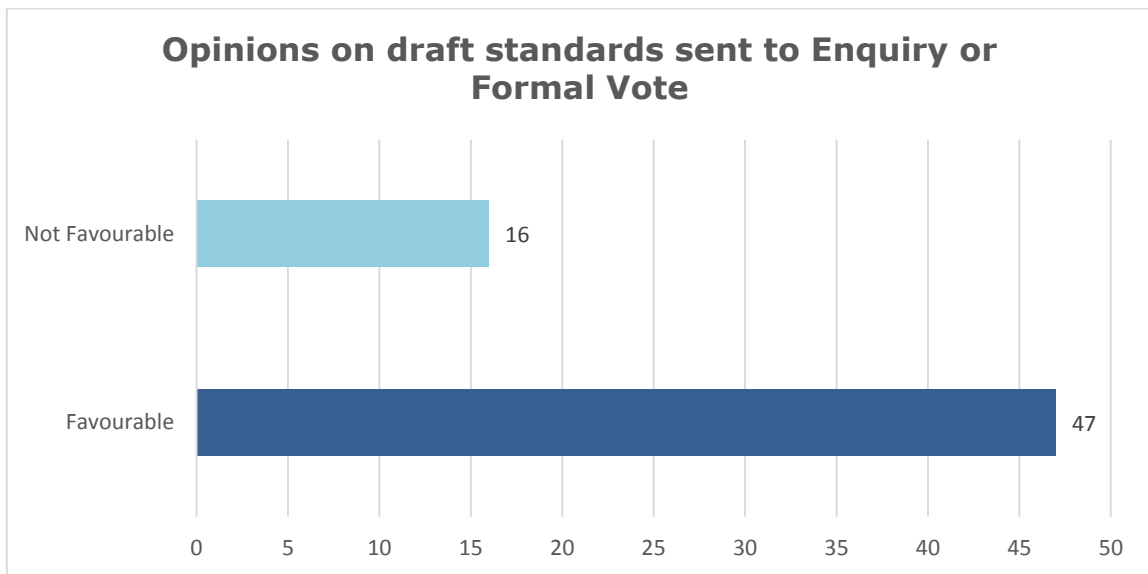


FIGURE 3 Number of Opinions on draft standards submitted by ANEC in 2017.

Success stories

CEN-CENELEC implements the Opinion on draft standards

In November 2016, CEN and CENELEC granted ANEC, ECOS & ETUC - the Societal Stakeholder Organisations (SSOs) recognised through Annex III of Regulation (EU) 1025/2012 - the right to submit an Opinion on draft standards sent to Enquiry or Formal Vote. The right was implemented on 1 January 2017.

Although the Opinion does not affect the decision on adoption of a European Standard (EN), which remains with members of CEN-CENELEC through the national

delegation principle, it allows an SSO to say whether it supports adoption through a "Favourable" or "Not Favourable" statement. The parent Technical Committee is required to consider the Opinion and report to the Technical Board. If the EN is adopted on the vote of members, but the TC agrees with a "Not Favourable" Opinion, it must take a corrective action (e.g. amendment, revision of the standard). The Opinion reflects a proposal ANEC made during the Independent Review of the European Standardisation System in 2015.

We applaud the decision as we have asked for our voice to be strengthened in the adoption of standards for many years. It has been a source of frustration for us and our experts at not being able to show support for the adoption of a standard when we have committed many days to its drafting, or being able to voice concern if we think the committee has overlooked a fundamental issue. Although the Opinion is not a vote, it is a notable step toward greater inclusiveness and a key achievement for ANEC.

We prepared a [leaflet](#) with further information on the Opinion.

By end 2017, ANEC submitted a total of **63** opinions, 47 "Favourable" and 16 "Not Favourable". So far, we believe the mechanism has delivered on our objective of giving visibility and weight to our positions, while respecting the national delegation principle.

ANEC expert elected ETSI 3SI Advocate

ETSI has introduced the 3SI Programme to deepen inclusiveness. The focus of the Programme is the four Annex III Organisations, but it also intends to strengthen engagement with other weaker stakeholders. The 3SI Advocate is to champion the Programme, and to be the principal point of contact. ANEC expert, John Ketchell, was nominated jointly by ECOS, ETUC, SBS and ANEC to become the first 3SI Advocate, and was subsequently elected unopposed by the ETSI Board and General Assembly in November 2017. The precise role and responsibilities of the Advocate will be developed in 2018. One task may be to convey the views of the Annex III Organisations on draft standards, as the ETSI echo of the CEN-CENELEC Opinion. Although all four are full members of ETSI having voting rights, the single vote allocated to each of the Annex III Organisations (due to low financial "turnovers") is ineffective.

ANEC wins support for action on interconnected products

ANEC was pleased to see the support expressed by the most Member States at the EC TCAM Experts Group meetings in 2017 for our proposal for a European Commission delegated act to make personal data protection an essential requirement under the Radio Equipment Directive. Harmonised Standards could support these requirements and we believe could encapsulate privacy and security-by-design. Our proposal is an answer to the #toyfail campaign which showed internet-connected products now on the market are far from secure. In the example identified by the Norwegian Consumer Council (NCC), and shared with ANEC and BEUC, the NCC showed it was possible to hack two internet-connected toys (Cayla

and i-Que) using a Bluetooth connection (so allowing the hacker to talk to children through the doll). Both toys also demonstrated that the manufacturer did not respect data privacy issues.

In October, ANEC joined another action across the Atlantic against children's smart watches. These have been shown to put children's safety and privacy at risk. The smartwatches, intended to provide parents with peace of mind, are wearable mobile phones that use the internet and GPS to allow real-time tracking of children, and communication with them. The Norwegian Consumer Council, together with a security firm, analysed four smart watches available online and in Norwegian stores. The tests revealed a stranger can take control of a smartwatch to track, listen, or talk to the child, all without a parent's knowledge.

A TCAM sub-working group was set up to examine our proposal. It will meet in February 2018.

ANEC influences ethics in the security sector

Also on data security, ANEC contributed the consumer perspective in the drafting of the CEN Workshop Agreement (CWA) 'Guidelines for evaluation of installed security systems,' which resulted from an FP7-funded project. The criteria are for a certification scheme to address the security sector (e.g. video surveillance) in order to introduce ethical, social, legal aspects in certification of security products, systems and services.

The SATORI project on ethics assessment of research and innovation (R&I), published two CEN Workshop Agreements methods for ethics assessment in R&I. ANEC was a member of the Advisory Board.

ANEC achieves new EMF standards to increase consumer protection

ANEC influenced new CENELEC standards on human exposure to electromagnetic fields (EMF) from mobile phones, RFID devices and broadcasting antennas. These require the products be tested under conditions of reasonably foreseeable use, in line with applicable legislation (Radio Equipment Directive, 2014/53/EU).

The standards were developed by CENELEC TC 106X 'Electromagnetic fields in the human environment'.

ANEC study leads to standards on child protection

An ANEC Technical Study on child protective products that led to creation of CEN/BT WG 184, and then CEN/TC 398 "Child Protective Products", was a key influence in the drafting of EN 16948 "Consumer fitted child resistant locking devices for cupboards and drawers"

It is the third standard on child protective products, following publication of EN 16281 on devices for windows and balcony doors, and EN 16654 on devices for doors.

ANEC influences safer playgrounds

The adoption by CEN of playground equipment standards EN 1176-1, EN 1176-4 & EN 1177 was an achievement for ANEC. We were influential in shaping the requirements of the standards which offer major improvements in the levels of protection offered.

ANEC scores on standard for moveable goal posts

For many years, ANEC voiced concern as the European standard for football goalposts dealt only with goalposts used during organised activities (such as training and competition). It did not take into account non-organised or leisure activities. Children in the EU have died due to falls of non-fixed goal posts. In answer to ANEC, CEN/TC 136/WG 22 'Gymnastic equipment' agreed in 2010 to work on new European standards for portable goals. ANEC played a leading role in development of EN 16579 'Playing field equipment - Portable and permanent socketed goals - Functional, safety requirements and test methods', adopted in October 2017. An earlier standard, EN 16664 'Playing field equipment — Lightweight goals — Functional, safety requirements and test methods', was adopted in April 2015.

ANEC persistence pays off on surface temperatures. . .

In the area of domestic appliances, the limits for surface temperatures have been of great concern to ANEC for years. The industry as a whole has resisted compliance of products with the lower limits of CENELEC Guide 29 (& IEC Guide 117). However, after much pressure from ANEC, CENELEC TC 61 accepted an EC Implementing Decision upholding the present Formal Objection against EN 60335-2-9 on grills and toasters. This will require review of all similar standards to reduce the risk of burns or other serious injuries, notably among vulnerable consumers (children, older people, those with disabilities). CENELEC TC 61 WG 1 has created a task force to set temperature limits in accordance with CENELEC Guides 29 and 32. ANEC participates.

. . . and child-appealing products

ANEC welcomes reactivation of CENELEC TC 61 WG8 dealing with child-appealing domestic appliances, again after much ANEC pressure. The WG will consider the results of independent research on "child-appealingness" which has been available for seven years. A new version of clause 22.44 to EN 60335-1 has been prepared on which ANEC commented in July. The new clause will be supported by a rationale - drafted by ANEC - to outline the issue of children's exploratory behaviour, as well as the concepts of "child-appealingness" and "danger".

New pictogram warns consumers not to use barbecues indoors

ANEC welcomes the adoption by CEN members of EN 1860-1/A1 "Appliances, solid fuels and firelighters for barbecuing – Part 1: Barbecues burning solid fuels - Requirements & test methods". The amendment introduces a safety symbol to appear on barbecues in order to warn consumers not to use barbecues indoors

because of the risk of carbon monoxide poisoning. Some consumers use barbecue grills to heat a tent or caravan, or to cook in case of rain. Nevertheless, ANEC regrets a delay in the adoption of the amendment, during which time accidents continued to happen. In 2013, we urged CEN/TC 281/WG1 to seek advice from ISO as we did not think the proposed symbol met ISO 3864-3 "Safety sign design principles". Unfortunately, ISO/TC 145/SC2/WG1 was asked only later, and its advice in 2016 confirmed our view that the symbol was not compliant.

ANEC leads new CEN Guide on hazardous substances in product standards

In June, CEN Guide 16 'Guide for addressing chemicals in standards for consumer-relevant products' was approved. The adoption of the Guide marks a watershed in the way in which technical bodies will consider reference to hazardous substances in standards. The development of the Guide was led by the Austrian member of the ANEC General Assembly and Chair of the ANEC Sustainability Working Group.

In September, ANEC influenced the strategy to implement Guide 16 among CEN technical committees and working groups.

ANEC improves SReq on Polycyclic Aromatic Hydrocarbons

Exposure to polycyclic aromatic hydrocarbons (PAHs) - many of which are carcinogens - has long been an issue of concern. REACH restricts PAHs in toys and childcare articles. However, the exposure of children to PAHs via materials in children's articles, such as clothing and toys, remains of great concern.

The Committee on Standards voted favourably on the adoption of an EC Implementing Decision on a Standardisation Request (SReq) regarding compliance with maximum content criteria of Polycyclic Aromatic Hydrocarbons in rubber and plastic. ANEC supported the drafting of the SReq which asks for the development of harmonised standard(s) that enable the analytical determination of the individual concentrations of eight carcinogenic PAHs listed in REACH.

Good progress on chemicals in toys

In February, ANEC expressed disagreement and sent a 'Not Favourable' Opinion concerning the Enquiry on EN 71-7/prA1 'Safety of toys – Part 7: Finger paints – Requirements and test methods'. We asked for the deletion of several chemical substances used in finger paints, in line with the Cosmetics Regulation. Several CEN members and the Commission added voice to our concerns. We were pleased to see these concerns addressed in the post-Enquiry consideration by CEN/TC 52 and hence submitted a 'Favourable' Opinion during the Formal Vote in July. EN 71-7 was adopted and published on 27 September.

Work of the subgroup chemicals in toys of EC Toy Safety Expert Group also progressed well. Apart from the development of several positions, ANEC could welcome the restriction on lead limits in toys that was published in OJEU, reflecting our standpoint.

ANEC wins prioritisation of services standardisation

ANEC provided the consumer view in the drafting of the CEN Strategy on Services, adopted in spring 2017. It reflects our demand that work on service standards should respond as a matter of priority to consumer detriment in the cross-border provision of services. However, the continued absence of an EU legal framework on the safety of services means some standardisation work, notably on healthcare, is already proving difficult and controversial.

ANEC helps shape Regulation on cross border parcel delivery

In October, the draft EP report on cross border parcel delivery, addressing the draft Regulation proposed by the EC, was approved by the Transport & Tourism (TRAN) committee of the European Parliament (EP). In mid-December, this was followed by a provisional deal among the EU Institutions. The Regulation will provide clearer consumer information on prices for cross-border deliveries & returns, and advice on how to file complaints.

The direction of the Regulation was aided the ANEC position on the proposal for a Regulation on cross-border parcel delivery services (May 2017), and in advice and support to Rapporteur MEP Anderson provided by the ANEC President and Secretariat.

ANEC and ETSC gain commitment of European ministers

For many years, ANEC has been supporting the European Transport Safety Council (ETSC) in its ambition for a European target to be set in reduction of serious road injuries. In 2017 alone, we co-signed a letter to transport attachés; co-signed a coalition letter to the EC asking for ambitious new vehicle safety standards, and issued a press release with partners to call for action on vehicle safety standards. Hence, we were delighted that, as part of an initiative of the Maltese Presidency and the European Commission, transport ministers signed the Valetta Declaration on road safety during a High-Level Ministerial Conference held in Valetta in March 2017. Furthermore, on 8 June, the Council agreed to set the target of halving the number of people seriously injured on EU roads between 2020 and 2030. Our position was further supported by the Parliament in its report of 17 November demanding new safety measures for cars and vans, as well as new requirements for lorries.

Revised standard to help consumer (pedal) power

EN 15194 is the European standard for electric power assisted cycles (EPACs). These EPACs have a maximum continuous rated power of 250 Watts, of which the output is reduced and then cut as the EPAC reaches a speed of 25 km/h (or sooner if the cyclist stops pedalling). The version EN 15194:2009+A1:2011 'Cycles - Electrically power assisted cycles - EPAC Bicycles (EPACs) was obsolete and needed to be revised as it did not provide sufficient safety.

ANEC played a leading role in the revision of the standard, adopted in April as EN 15914:2017 'Cycles - Electrically power assisted cycles - EPAC Bicycles (EPACs)'. It should see safer and more reliable EPACs on the roads.

ANEC contributions to the standard include requirements for reflectors/active lighting; the brake dimensions; marking of maximum load on the frame; increased stability, and dynamic test procedures based on real-world loads.

ANEC wins another step towards phasing out UNECE Regulation 44 (R 44)

As phase 2 of R 129 on Child Restraint Systems (CRS) has been implemented since June 2017, it was natural for ANEC – as the sole consumer advocate present in the UNECE GRSP- to accelerate the phasing out of the old R 44. Since June 2017, non-integral CRS have been able to be approved according to UN Regulation 44 or 129 at the discretion of the manufacturer and for an undefined period.

Hence ANEC proposed to stop approval of group 2 and group 2/3 CRS according to R44 as from September 2018. We thought it undesirable that manufacturers can start to develop new products according to the outdated Regulation 44 for an undefined period. Despite resistance from the manufacturers, UNECE agreed on a date in 2018 for the ending of approvals to R44, a victory attributable to ANEC. As such, consumers will be presented with less confusion in the market, and elimination of less-able Child Restraint Systems.

Safer Medical beds for children with disabilities

ANEC welcomed the publication by CENELEC of EN 50637:2017 'Medical electrical equipment - Particular requirements for the basic safety and essential performance of medical beds for children', because it offers a high level of child protection and so can assure parents that their children with disabilities will be moved safely when in hospital. Many of the advances in the standard were proposed by ANEC.

Problems encountered

For the most part, ANEC experts were integrated easily in the work of the Technical Bodies of the European Standardisation Organisations. But, in a few cases, problems were still encountered in accessing the relevant technical documents (draft standards) and in receiving relevant information (e.g. the cancellation of meetings dates). Overall, a very considerable improvement must be noted since 2014 regarding access to draft standards and meeting documents for ANEC representatives, together with the added weight of the CEN-CENELEC Opinion since January 2017.

ANEC lost access to the **Systematic Reviews** of European Standards following a change to the CEN-CENELEC IT system. Moreover, we were not informed about the change. We complained to the CEN-CENELEC Societal Stakeholders' Group (SSG) as we think this lack of access runs counter to the provisions of Article 5(d) of Regulation 1025. The SSG sent the matter to the CEN-CENELEC Working Groups on

Policy as the problem partly arises from (free) access to published standards. Although the two Groups agreed to provide access – subject to certain conditions – their decisions need to be endorsed by the CEN-CENELEC Presidential Committee and two Administrative Boards. In the meantime, routine access to the Systematic Reviews is not possible.

Although we welcome the CEN-CENELEC decision to introduce the “Right of Opinion” on draft standards at Enquiry and Formal Vote, the right of **appeal** against ratification of a standard (and its automatic implementation by CEN-CENELEC members) remains limited to standards to which ANEC (or other Partner Organisations) have contributed. ANEC does not believe this obstacle to stopping national implementation of a standard is in the interests of consumer protection or welfare. Nevertheless, the possibility to cast a “Not Favourable” Opinion, to which a technical committee must respond, should reduce the need to appeal, even if it does not eliminate it.

ANEC appealed in July 2017 against ratification of **EN 81-70** ‘*Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Accessibility to lifts for persons including persons with disability*’. ANEC did not agree with a change of contrast requirement for symbols on push buttons, introduced after the Enquiry phase. The appeal was heard by a conciliation panel in October. It invited CCMC to approach the EC Joint Research Centre (JRC) for a study related to the accessibility requirements for lifts regarding the visual contrast in control panels. Unfortunately, the JRC declined to carry out the study.

ANEC will maintain the appeal until there is clarity about whether a study is possible and who could do it. Nevertheless, the CEN Technical Board decided publication of the revised EN 81-70 should proceed (and we accept it contains improvements for persons with disabilities, apart from the issue of contrast value). Having contacted the EC to ask whether this provision of the EN 81-70 should provide presumption of conformity, we understand there are reservations and these will be discussed in 2018. We believe a point of principle is at stake which is that a standard for accessibility fails to address the needs of a large community of persons with disabilities. Moreover, standardisation must be seen to be inclusive and not exclusive in its effects.

ANEC regrets the EC used an “informal procedure” in the Committee on Standards to adopt an amendment to Mandate **M/350** on Environmental Performance of Buildings using Environmental Footprint Methods still on trial and not evaluated. The adoption was not transparent and we were surprised when the amendment was sent to CEN in March. Despite an ANEC letter to CEN members, and request to our members to lobby at national level, CEN adopted the amendment. Although a later letter to members of the Committee on Standards did not encourage members to withdraw the amendment, as a remedial action, we welcome that the EC agreed to reconsider use of the “informal procedure” following the support of Austria and Germany for our view.

Conclusions

Further to its Final Report 2017, ANEC continues to make good progress in meeting the objectives of the present Framework Partnership Agreement, and its supporting Operating Grant Agreements.

We welcome the further progress made by CEN-CENELEC and ETSI in deepening the inclusiveness of societal stakeholders, particularly with ETSI having now adopted the 3SI Programme after a previously lukewarm commitment. We are pleased the ANEC representative in the ETSI General Assembly has been elected the first 3SI Advocate by General Assembly members, following his common nomination by the four Annex III Organisations, and now wait for the precise tasks of the Advocate to be defined.

ANEC is making full use of its right to submit Opinions on the drafts of CEN-CENELEC standards, having sought a more effective voice in the adoption of standards for years. We have no doubt that business becomes more competitive if its products & services are delivered through standards that respond to the needs and expectations of society. We believe this was confirmed by the Parliament in its report, "European standards for the 21st century" and expect it to be a theme of the inter-institutional dialogue in 2018.

For the most part, ANEC is pleased with the progress of the JIS, but the lack of the engagement of Member States with Action 10 is of great concern. Only the Member States can provide the political and financial frameworks needed to aid participation of all stakeholders in standardisation at national level, which remains the principal route to European and international standardisation through the national delegation principle. Most national consumer organisations are impoverished, both financially and in terms of the experts available to them. It is why many countries need ANEC to ensure the consumer voice is heard in CEN-CENELEC and ETSI.

This weakness underlines the need for ANEC to be able to ensure the continuation of the European consumer voice in standardisation beyond 2020. In pursuing this, the Steering Committee has adopted a Diversification Action Plan to be the roadmap for the actions we plan in 2018 and 2019 to secure ANEC in its role.

In parallel and further to the Action Planning report of 2016, ANEC engaged a common Fundraising Officer with BEUC and ICRT in April 2017. Nevertheless, as foreseen in the Action Planning report, he has not found private sponsors willing to fund consumer participation in standardisation (even in "hot topics", such as cybersecurity). There is an indication, though, that ANEC and its expertise in standardisation could fulfil the needs of H2020 projects, especially where there is a clear link to standardisation.