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**Communication of the Commission on the Integration of Environmental Aspects into
European Standardisation**

Extended Impact Assessment

{COM(2004)130 final}

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1. PROBLEM IDENTIFICATION

Standardisation is a voluntary process carried out by and for the stakeholders within the structures and rules of standards organisations. The resulting technical specifications are voluntary consensus documents that may define, for example, how a product is manufactured used or disposed of.

In recent years, the number of European standards has grown significantly – the total number of European Standards is estimated at 13,500. The interest in European standards and this increase in numbers can be explained by the fact that standards play a positive role in the economy as they reduce transaction costs, facilitate trade, increase competition, and channel innovation. Moreover, European standards help to avoid technical barriers in the internal market, they are consistent with the international trade framework deemed to facilitate global trade and in some instances, they are used to implement European legislation.

There are three European Standardisation Organisations (ESOs), CEN, CENELEC and ETSI. They are recognised under Community law (Directive 98/34). Jointly adopted guidelines exist for the co-operation between the Commission (and EFTA) and the European Standards Organisations (OJ C 91 of 16.4.2003).

The growing number of standardised products, processes and services poses questions about their effects on the environment. There are many standards and many ways in which standardised products can interact with the environment. Virtually all standardised goods and processes impact on the environment, although this impact may or may not be significant. Four major types of relationships between standards and the environment have been identified: the environmental dimension of products, the standardised tests methods for environmental purposes, the environmental technologies included in standards and the environmental management standards.

However, the extent to which the environmental dimension is taken into account varies among national and European standardisation organisations. There are many tools already developed, yet their use is not systematic. One of the main obstacles identified during the consultation phase was a lack of environmental knowledge among experts sitting on technical committees.

Practices regarding stakeholder participation also differ. Standardisation is a business-driven process, even though it must ensure openness to the representation of all interested parties, in particular if standards are to be widely recognised and used in the market. There are various groups of stakeholders that have particular difficulties in taking an active part in standardisation: small and medium sized enterprises, environmental and consumer non-governmental organisations and representatives of the workforce. They often lack knowledge about the standardisation process itself, and even if this is not the case, they may still experience shortcomings in terms of financial and human resources.

The large number of standards adopted every year, the ever-widening scope of products and processes that they cover, along with the voluntary character of this process, means that it is not possible for the European Commission to assess the environmental dimension in individual standards. It is more appropriate for the Commission to focus on the European standardisation process as a whole (tools and methods applied) and its institutional framework (participating stakeholders) in order to stimulate the production of European standards that positively contribute to the environment and to sustainable development in view of their

economic and social importance. The Commission is tackling the issue of integration of environmental aspects into standardisation for the very first time at this level. In order to send a strong signal to all stakeholders involved in the standardisation process (industry, standardisation organisations, NGOs and public authorities), and bearing in mind the voluntary nature of standards and their consensus-based elaboration, it is therefore crucial to have a sufficient level of visibility and of commitment from the Commission services. A Communication was deemed to be the best way to start the process even though this Communication has to be seen as a stocktaking exercise presenting the state of the art and highlighting areas which deserve more attention in the future to meet our objectives.

No policy change scenario

A 'no change' scenario means that even though the number of European standards continues to grow - mainly due to technological, but also to legislative developments - the integration of environmental aspects would remain un-systematic, becoming more a consequence of a personal commitment by a few experts rather than being based on a consistent analysis of potential impacts. Consequently, an opportunity for sustainable development in Europe would be missed. In other words, the environmental pillar may be neglected and standards would not contribute to the development of more sustainable production and consumption patterns.

There is also the risk that if European standards fail to take into account relevant environmental aspects, they would become less attractive and relevant for both the market and public authorities.

2. MAIN OBJECTIVE OF THE COMMUNICATION

The aim is to promote the effective integration of environmental aspects into the European standardisation process.

3. POLICY OPTIONS

There are three major policy options available:

- Do nothing (business as usual);
- Encourage stakeholders to make further voluntary efforts;
- Use of legislative and financial instruments.

3.1 Do nothing (business as usual)

This option assumes continuing limited support from the Community budget for the participation of environmental NGOs such as ECOS (European Environmental Citizens Organisation for Standardisation). Indeed the European Commission has already shown the great value it attaches to the full involvement of all stakeholders in the European standardisation process. To that effect, it has already ensured representation of both consumers and workers for several years. With this new contract to ECOS, launched in November 2003, the voice for the environment is now secured.

Under this option the Commission will continue drafting standardisation mandates for environmental issues, concentrated mostly on measurement and performance standards.

The European standardisation organisations will continue to use some existing tools for the consideration of environmental aspects in standardisation, but not systematically and without any extra incentives from the Commission or national authorities.

3.2 Encourage stakeholders to make further voluntary efforts

The second option goes further and assumes that the stakeholders themselves could increase their efforts to systematically improve the integration of environmental aspects into European standardisation. Although the standardisation process is voluntary and based on consensus, all stakeholders involved are sensitive to strong political messages that can be sent out from the Commission. They would also react positively to incentives and accept appropriate support offered to them. This option assumes the development of incentives and targeted support for the stakeholders and the system. Identification of these measures has been the key objective of stakeholder meetings and consultations organised in 2002/2003 and the Communication aims to present the outcome of these previous phases. In a nutshell, 4 key issues have been identified to encourage stakeholders to make further voluntary efforts:

- raising awareness and environmental thinking
- setting priorities
- enhancing wider stakeholder participation
- using tools and offering incentives.

3.3 Use of legislative instruments

The third option assumes that legislative instruments would be used in lieu of voluntary standards if the stakeholders were not willing to deal with environmental aspects in standards making. As a consequence, public authorities would then need to lay down detailed rules for technical issues that could have been dealt with by the standardisation process. The authorities would need to assess, lay down and revise in the light of technical progress, the technical, economic and environmental specifications needed by the stakeholders. The associated cost would need to be covered entirely by public funding.

4. SOCIAL, ENVIRONMENTAL AND ECONOMIC IMPACTS OF EACH POLICY OPTION

4.1 Do nothing (business as usual)

Environmental: There are many European standards that could have impacts on the environment in one way or another. Doing nothing may be a lost opportunity as these standards could make a positive contribution to safeguarding or even improving the environment. This impact is difficult to assess in quantitative terms due to the wide scope of products and goods covered by standards. The environmental pollution resulting from using goods made to standards that do not take the environmental dimension on board is very diverse. As far as products are concerned one should also take into account the different phases when environmental impacts can occur: design, production, use, re-use and disposal.

Social: Existing European standards support a number of directives for workers' health and safety and for consumer protection. Also, standardisation stakeholders, including industry and business, have an interest in developing standards for safe products and processes. If business as usual is continued, limited stakeholder participation from consumer organisations, unions

or environmental NGOs will risk to make the standardisation process less democratic and user-oriented. On the other hand, users such as consumers or public authorities may prefer to purchase products which have a better environmental performance or at least to have information on this issue. Standards which take the environment into account are more likely to lead to products which give these elements to users.

Economic: There is little if any economic impact in the business as usual option because the drivers for standardisation are industry and business who want to find technical agreements for the purposes of compatibility and trade. The majority of the existing European standards have been created by the wish to enable trade and to effectively implement the single market. Only in the long term could a worsening of the state of the environment potentially exercise pressure on the standardisation stakeholders to systematically deal with environmental aspects.

4.2 Encourage stakeholders to make further voluntary efforts

Environmental: Further voluntary initiatives in this area would lead to a positive impact on the environmental pillar of sustainable development. Taking into account the wide coverage of standards, integration of environmental aspects will help to reduce the negative impacts of certain goods and processes. However there are three factors that will delay the potential positive effects. Firstly, taking into account the large number of stakeholders there is some time needed to raise their environmental awareness and to provide them with efficient tools to effectively deal with environmental consideration in the standardisation process. Secondly, the time span needed for development or revision of a standard varies from 3 to 5 years. Lastly, due to the large number of standards and the limited capacities of the standardisation bodies and their stakeholders, it would be unrealistic to expect immediate integration of the environmental dimension into all standards.

Social: This option may have an ultimately positive impact for consumers who buy products and services produced in accordance with standards which consider environmental aspects. Also, purchasers along the production chain and public authorities may have more choices between products and services with certain environmentally relevant functionalities and characteristics. Another positive aspect is the potential contribution to the state of the environment that in the long term leads to improvement of health, including health and safety at the workplace. A negative impact of this option may be that the efforts of standardisation stakeholders are steered away from the existing work on health and safety and consumer protection.

Economic: When environmental aspects are integrated appropriately, there could be economic benefits to the standards users – an obvious positive impact. However, a negative impact of this option may be that the existing standardisation work which supports economic activities such as free trade and the single market risks to be hampered. Moreover, the involvement of more stakeholders who have previously not taken part in standardisation activities, may delay the delivery of the new standards beyond what is acceptable to the market. This in turn may hamper innovation in the European economy. However, one should recognise that the standardisation process is already too lengthy in some instances and that efficiency improvements are under way. Therefore there are different potential delay-factors that should be addressed. Encouragement of stakeholders to make further efforts implies increased financial support for the environmental stakeholders so that they can effectively participate and apply the appropriate tools to integrate environmental aspects into European standards. This can be considered as an economic impact as such.

4.3 Use of legislative instruments

Environmental: This option may lead to the quickest results with the legislator developing and reviewing standards from their environmental point of view. This could be considered as a positive impact on the environmental pillar. However, it would change the well defined relationship between the legislator and the standardisation system and put the existing achievements at risk. In addition, it could create negative perceptions of the environmental debate – no other policy area has needed special legislation to become considered in standardisation.

Social and economic: This option may be perceived as heavy-handed interference. This may lead stakeholders to leave the system altogether so the current work being done for the social and economic aspects in standardisation could suffer. On the other hand, the public authorities would have to assess, lay down and revise in the light of technical progress, the technical, economic and environmental specifications needed by the stakeholders. The associated cost would need to be covered entirely by public funding. Overregulation and a regulatory process that is overburdened with technical detail would negatively impact on Europe's economy and competitiveness.

5. MONITORING OF RESULTS

Due to the financial assistance given by the EU to European standardisation (5-6% of the total estimated cost of European standardisation), there is a need for the European standards organisations to be accountable and to regularly report on a number of issues. Also, due to the principle of national representation in the European standardisation system, there is a need for cooperation between the Commission and the Member States. For the integration of environmental aspects, progress reports from the different stakeholders such as the European standardisation organisations, the Member States or the private stakeholders from business and NGO side are foreseen. These should make some benchmarking possible and, if the focus is on continuous improvement, will be enable progress to be tracked. The Commission can regularly assess the situation, give further support, or propose new or alternative measures as and when it feels necessary. Main activities to be followed are:

Environmental thinking

Care for the environment, optimal use of resources and efficient energy consumption have grown in importance amongst economic operators, customers and public authorities. Standards should participate to this trend.

Experts involved in the development of standards have this power in their hands to influence the provisions written in the standard. The Commission is aware of the voluntary and consensus driven nature of standards. The Communication therefore aims to promote awareness-raising activities and an exchange of expert knowledge and good practice. This is a qualitative approach which is needed to trigger off the process and measurable aspects will come only in the long run. As regards quantitative aspects, ideas such as the provision of training are options which were highly supported by the stakeholders during the consultations. The Commission, in cooperation with stakeholders, therefore intends to explore the possibilities in these areas, identify what already exists at European or national level, work with stakeholders to better define their needs and present concrete actions in the coming months.

Setting priorities

Priorities can be set by the European Standardisation Organisations via their work programmes or by the Commission via the mandates. At this stage, these options were deemed to be interesting enough to be included in the Communication although it is clear that further dialogue and research is needed on how to put these measures into practice. This is particularly important for the mandates which observe specific rules, under specific conditions (a political or legislative framework for instance).

Stakeholder participation

The acceptability of standards depends to a large extent on the involvement of all stakeholders. The participation of civil society (e.g. stakeholders representing consumer, health, safety and environmental interests) in standardisation reinforces the quality of consensus and makes the standards more representative and thus acceptable for use by the stakeholders themselves, and, if appropriate, by the authorities. The monitoring of these participation (at national and European level) and information regarding names of participants, funding, areas of expertise, etc. could be easily coordinated by European standardisation organisations and passed on to the Commission.

Systematic and better use of tools

The national and/or European Standardisation Organisations have already developed a number of useful tools which can directly help with the integration of environmental aspects into standardisation. Their further development and systematic use should be encouraged. Environmental databases for example already exist in some specific areas. An assessment of these databases could be carried out to see under which conditions they could be further developed to cover other areas of activities.

Generally speaking, three sets of criteria could be considered together with stakeholders:

- When designing concrete awareness raising and/or training activities in the future, one should define indicators to monitor the participation at national and European level.
- Likewise, if databases containing relevant environmental information are established, indicators could be for example, the number of entries into the database and the number of queries made, etc.
- It is also important to monitor progress regarding the integration of environmental requirements. To that effect, stakeholders should be invited to develop appropriate indicators.
- It is important to bear in mind the Communication aims at presenting ideas that have been validated by the stakeholders. The process started two years ago and a lot of ideas were suggested but rejected for one reason or another (see also annex to the extended impact assessment). As stated in the Communication, all these ideas deserve further attention with relevant stakeholders. However their support for them needs to be built up and a commitment obtained.

6. STAKEHOLDER CONSULTATION

Two stakeholder meetings took place in July 2002 and in July 2003. In addition, DG Environment and DG Enterprise held an internet consultation which ran from mid July until mid-September 2003 and invited all stakeholders to deliver their comments on a working document setting out the elements aiming at the encouragement of stakeholders.

A questionnaire was also developed to help gather comments and feedback for the alternative policy options. The extended impact assessment has been refined in accordance with the results of the stakeholder consultations. The detailed results of the consultation can be found in the Annex.

Overall, the consultation highlighted that:

- the aim and scope of the Communication targeted at the stakeholders is relevant and appropriate;
- all key issues have been identified;
- there are enough tools to address environmental issues in standardisation, but they require time, expertise and resources to be used systematically and all stakeholders must address this challenge;
- the Commission and Member States should jointly play a role in facilitating the effective participation of all interested stakeholders in the standardisation process;
- the progress made with the integration of environmental issues into European standardisation should be reviewed every five years.

7. COMMISSION DRAFT COMMUNICATION AND JUSTIFICATION

From the policy options available, the encouragement of stakeholders to make further voluntary efforts has been identified as a proportionate and balanced approach in view of the nature of the subject and the goals pursued. The results of the stakeholder consultation provide reassurances for this approach.

Two instrument options were considered: a working paper from the Commission services and a Communication from the Commission.

7.1 Instrument option: Working Paper from the Commission services

This paper would focus on the role of the Commission services, for instance, in the development of standardisation mandates or of legislation that sets out specific requirements for corresponding standards. The stakeholders who need to be convinced most may take little notice of this instrument.

7.2 Instrument option: Communication from the Commission

A Communication is considered a realistic option considering the nature of standardisation: a voluntary and stakeholder driven process. In view of its political significance and the contributions European standardisation has made and should make to EU policies, a Communication is a good way to meet the objectives of visibility and encouragement for

stakeholders. The Communication also invites political feedback from the Council, the European Parliament and the Economic and Social Committee.

ANNEX to the Extended Impact Assessment

Report on the Public Consultation

The Integration of Environmental Aspects into European standardisation

25 July 2003 – 15 September 2003

This is a joint report by the Enterprise and the Environment Directorate General of the European Commission.

The aims for this report are:

- to describe the steps taken by the Commission to ensure the full consultation of stakeholders during the formation of a policy on the integration of environmental aspects into European standardisation
- to analyse the views collected during the public consultation.

The public consultation of stakeholders is part of the Commission's extended impact assessment process.

Consultation websites:

http://europa.eu.int/yourvoice/consultations/index_en.htm

<http://europa.eu.int/comm/enterprise/consultations/list.htm>

http://europa.eu.int/comm/environment/consultations_en.htm

BACKGROUND

Between 25 July 2003 and 15 September 2003, the Enterprise and Environment DG of the European Commission held a public internet consultation on the integration of environmental aspects into European standardisation. The consultation followed the Commission's consultation standards¹ and was aimed at stakeholders in the European standardisation system: businesses and industry, NGOs, public authorities and standards organisations. The stakeholders were asked to give their views on a working document for a Commission Communication on the integration of environmental aspects into European standardisation. In order to take advantage of the principle of Interactive Policy Making (IPM), a set of questions, designed by the responsible Commission services, was also posed.

At the start of the internet consultation period a multi-stakeholder meeting was held. It took place on 16 July 2003 in Brussels. This helped to raise attention for the internet consultation, clarify the objectives and check the initial contents of the planned Communication. The multi-stakeholder meeting was, in fact, the second of its kind since the responsible Commission services started to look into the opportunities and challenges linked with the integration of environmental aspects into standardisation in 2002 and held a first stakeholder meeting on 17 July 2002.

The feedback obtained from the meeting(s) and the responses now received from the internet consultation will feed into the extended impact assessment which is already underway for the Communication. The responses will help to further analyse the subject and examine the appropriateness of the policy instrument chosen. They will also help to finalise the text of the Communication itself and to make sure that it will cover the main issues in a balanced and appropriate manner.

MAIN FINDINGS

The general conclusion of the multi-stakeholder meeting of July 2003 was that the working document was a good basis for a Communication from the Commission.

The answers to the set of questions posed in the subsequent public internet consultation show that the presented text is broadly satisfactory to the range of different stakeholders at which it is aimed. There was a strong conclusion that the Communication will help stakeholders in their work and will help them achieve their aims in standardisation. Importantly, there is general agreement that a Communication from the Commission is the appropriate policy instrument for what the Commission is trying to achieve at this point in time.

The written contributions were often accompanied by general statements laying out the environmental policies of the respondents. These were often much wider than the contents of the Communication and indeed were wider than the subject of standardisation itself. Nevertheless, no stakeholders indicated opposition to the working document and the specific comments mainly related to the strengthening or clarifying of certain chapters.

To summarise, the main findings were:

- aim and scope of the future Communication are relevant and appropriate;

¹ COM (2002) 704 final, 11.12.2002

- all key issues have been identified, and it is important to clarify the relation between voluntary standards and mandatory legislation;
- there are enough tools to address environmental issues in standardisation. However these require time, expertise and resources if they are to be used systematically. All stakeholders must address this challenge;
- the Commission and Member States should jointly play a role in the financing for an effective participation of all interested stakeholders in the standardisation process;
- priorities should be set, primarily for efficiency purposes, on where to start with the integration of environmental aspects into standardisation; whilst the Commission could flag interest areas by way of mandate it should be left to the standardisation stakeholders to decide whether and how to deal with them;
- training of experts and the use of databases with relevant environmental information were considered the most instrumental incentives to incorporate environmental aspects into standards whereas the idea of awards was not supported;
- the international framework for standards and technical regulations must be respected to avoid unnecessary trade barriers, but the European standardisation system should take a certain leadership role in the development of specific environmental standards;
- the progress made with the integration of environmental issues into European standardisation should be reviewed every five years.

Annex 1: Multi-stakeholder meeting of 16 July 2003

1. FINDINGS

Nearly all those attending expressed a positive opinion on the presented working document for a Communication. Some new ideas were introduced and these were taken on board in the text that was placed on the internet. The NGO, however, did not feel that satisfactory solutions to protect the environment could be achieved by voluntary standardisation and indicated a general preference for mandatory requirements in standardisation or legislative approaches in favour of the environment.

1.1 General Statistics

Over 50 participants attended the meeting. The represented stakeholders came from business and industry, NGOs, and the standardisation bodies from both the Member States and candidate countries. The European standards organisations CEN (European Committee for Standardisation), CENELEC (European Committee for Electrotechnical Standardisation) and ETSI (European Telecommunication Standardisation Institute) were also represented.

Below is a detailed list of organisations represented during the meeting:

- ACEA
- AENOR
- ANEC
- ANIE - Electronic Industry Italy
- BEAMA Ltd
- BE-Federal Department of the Environment - Product Policy Division
- British Standards Institution
- BUND KNU
- CECED
- CEN - European Committee for Standardization
- CENELEC
- CENELEC BTWG 85-3 "Environmental Standardisation"
- Council of European Producers of Construction Materials (CEPME)
- Czech Office for Standards, Metrology and Testing
- Danish Standards Association
- DIN - Deutsches Institut für Normung e.V.
- ECOS
- EFTA
- Estonian Centre for Standardisation
- ETSI
- EUCAR
- EUROFER
- Federal Ministry for Economic Affairs and Labour
- FIEC (Fédération de l'Industrie Européenne de la Construction)
- Finnish Ministry of Trade and Industry
- Finish Standards Association SFS
- FME ORGALIME
- FNE - France Nature Environnement

- IEC/ACEA
- Malta Standards Authority
- Ministère de l'Economie, des Finances et de l'Industrie
- Ministry for Foreign Affairs, Sweden
- Ministry of Agriculture, Forest, Water and Environment (Romania)
- Ministry of the Environment
- Mission of Norway to the EU
- NEN
- NORMAPME
- ORGALIME
- Spanish Electric Manufacturers Association
- Spanish Permanent Representation to the EU
- Svenska Elektriska Kommissionen
- Swedish Ministry of Environment
- Swedish National Board of Trade
- Swedish Standards Institute
- TUTB - European Trade Union Technical Bureau for Health and Safety
- UK Department of Trade and Industry
- UMI

Annex 2: Internet consultation

1. FINDINGS

The analysis of replies received in the internet consultation are reproduced according to the structure of the working document and the questions of the survey.

1.1 Aim and Scope

Q1 Do you agree with the aim and scope?

Supporting comments

Most of the respondents agreed with the aim and scope presented in the working document. It was confirmed that the international framework and the effective participation of certain groups of stakeholders, like small and medium sized enterprises (SMEs) should be taken into account.

Concerns

Some stakeholders expressed concern as to whether voluntary standardisation was a valid tool to contribute to a high level of environmental protection and indicated a preference for mandatory solutions. Others pointed out issues like a potential cost increase or negative impact on competitiveness.

Q2 Have we identified all the key issues?

Supporting comments

The majority of stakeholders confirmed that the working document identified the main issues. Some respondents pointed out that the consumer dimension was insufficiently addressed, and if there is no consumer demand, it will be difficult to maximise profit through economies of scale. Moreover, the relation between legislation (mandatory) and standards (voluntary) should be explored. Experience already gained, for instance with the Environmental Help Desk of CEN, should also be added.

Concerns

Some respondents said that the inclusion of environmental aspects into standardisation does not guarantee a higher level of environmental protection, as standards are voluntary. Complexity of the standardisation process would generally make it difficult for some stakeholders, including SMEs, to get involved. This includes the fact that standards are regularly revised and that not every laboratory could test against every standard if tests were required.

1.2 Environmental Thinking

Q3 Should another policy option (e.g. legislation, guidelines) have been chosen by the Commission? If so, which and why?

Supporting comments

The main feeling was that a Communication was the appropriate tool. This respects the voluntary nature of standardisation best while progressing the matter forward. Most respondents said that specific legislation was not appropriate for bringing environmental aspects into standards

Concerns

A few respondents said that the debate on environmental aspects in standardisation needed a general legal framework, such as the European Directive on General Product Safety without this, stakeholders would be unlikely to include environmental aspects into standards.

Q4 How frequently should the progress be assessed regarding the integration of environmental aspects into standardisation (e.g. every 2, 5 or 10 years)

Supporting comments

Five years was seen as a satisfactory period by the majority of the respondents.

Q5 Do you feel that you or your organisation contributes to the promotion of environmental thinking in standardisation? If yes, please describe the nature of your contribution.

Supporting comments

Many respondents indicated that they were contributing to the promotion of environmental thinking in standardisation in one way or another. The dissemination of state-of-the-art knowledge and offers for training and educational material were mentioned. Also, some respondents undertook lobbying activities aimed at regulators. Companies and their associations mentioned the use of environmental management standards and environmental declarations, their involvement on the development of certain test and measurement methods, and for the environmentally conscious design of products. NGOs engaged in raising awareness for standardisation amongst their stakeholders or made active contributions to standardisation work and the development of the internal procedures of standards organisations.

Q6 What are your expectations with regard to possible positive and negative impacts of the ideas implemented in the text?

Supporting comments

Respondents felt that the promotion of environmental thinking in standardisation can have a positive effect regarding the state-of-the-art environmental performance of products. This includes issues such as the use of recycled materials in industrial activities. Also, the use of uniform measures (European standards) throughout the EU and EEA was mentioned. Business stressed the need to integrate environmental aspects without damaging the achievements of the existing standardisation process such as its facilitation of trade

Concerns

Some scepticism was expressed about the situation that standards would become prescriptive and not performance oriented. It was mentioned that unwanted delays and increased cost in the standardisation process could occur due to awareness raising and educational activities.

NGOs had the concern that business would limit environmental considerations to requirements imposed by the law. One organisation went as far as indicating that they do not believe in achieving results by awareness raising and recommended, instead, an obligatory environmental statement produced for each standard.

1.3 Tools and Standards for the Environment

Q7,8,9 Do you feel that there are sufficient tools to deal with environmental aspects in standardisation? If not, what new kinds of tools could improve the situation? Do you have any examples/experience of these tools being used?

Supporting comments

The general feeling was that there are sufficient and adequate tools and that these should be open to review and improvement as necessary. Most respondents felt that more encouragement was needed to ensure the use of these tools. Some said that the use of the tools could be systematic and monitored. There were no real concrete ideas for new tools (as defined as directly helping to integrate the environmental aspects - the use of databases is dealt with separately). Some considered Guides for product disassembly, use, disposal options and sustainable production as useful tools. Life cycle assessment (LCA) and educational tools were suggested. Many respondents said that they had used the existing tools and had positive experiences with them. However, no specific examples were given. A comment made several times was that the expertise to use these tools was needed. It was suggested that in the cases where comments from CEN's EHD were not taken into account, a justification should be provided.

Concerns

Some respondents felt that the CEN Environmental Help Desk (EHD) needed stable resources for staff from different backgrounds and countries. These respondents wished that CEN changed its internal rules and procedures regarding the role of the EHD.

Q10 Does the text correctly describe the existing tools? Have we forgotten some instruments used which are already being used in standardisation?

Supporting comments

Several additional existing tools were suggested including the following: ISO 14062, 14040, 14020, IEC Guide 109, 112 and 113, the EHD, CLC Database, CEN Memorandum 4, CEN Checklist and ENIS team (implements Guide 64). It was also mentioned that a leaflet describing all these tools may be useful.

Q11, 12 Are the categories for the existing standards for the environment correct and are the examples given useful? Please give other examples of types of standards that when applied, have a particular positive or negative impact on the environment.

Supporting comments

On the whole, this section of the working document was found to be useful, some simplification and clarification could lead to improvement. The categories of different standards for the environment should be changed to include product standards: product standards take environmentally friendly design into account and product standards are where the main thrust of effort is needed. In relation to this, it was said several times that safety took precedence over

the environment or that at least the environment must be assessed with the other aspects covered in product standards. Alternative headings were suggested: product standards, measurement standards, systems management standards, standards for dealing with products and technologies, other useful management standards, supply chain, procurement, design management. Many respondents noted that for the section on ISO EN 14000 management standards it should be stressed that the benefit came from applying it, not from the 3rd party certification to it. Several poor and one good example were presented.

1.4 Priority Setting

Q13, Q14 Should the Commission set priorities (at all)? Can you think of any positive or negative consequence of setting priorities?

Supporting comments

The views as to whether the priorities should be set by the stakeholders in the standardisation process or by public authorities like the Commission differed widely among the respondents. From the reactions obtained one could conclude that the European policy makers should flag public interest areas, but that it should be left to the discretion of the standardisation stakeholders to decide – on a case by case basis and agreed by consensus - whether and how to deal with them. Prioritisation as such was acknowledged as important and positive for better efficiency in standards making.

Concerns

Concerns were raised that low priority standards would be unlikely to see completion and ill chosen priorities would result in market distortion.

Q15 Do you have suggestions as to how priorities could be set?

Supporting comments

Respondents suggested different ways to set priorities for the integration of environmental aspects in standards. Proposals included a prioritisation according to industrial/product sectors, according to the links with EU legislation and policy, according to the relevance for public procurement, or according to key environmental problems tackled by international commitments such as the Kyoto Protocol.

Q16 Do you think that the Commission should use mandates in order to prioritise issues?

Supporting comments

Many respondents perceived mandates as tools for priority setting in standardisation. They acknowledged the potential for public authorities to express their priorities by means of standardisation mandates. However, some NGOs wanted to link mandates strictly to legislation and it was suggested that, on a general basis, an assessment of compliance could help to decide whether voluntary standards or mandatory regulations are the better solution. Some respondents wished to see mandates from the Commission regarding low carbon technologies to support Kyoto Protocol measures or regarding reverse logistics to facilitate the return of products from the market place at the end of their useful lives.

Concerns

Certain respondents had concerns as to the possibility of political decisions being transferred to standards organisations. It was suggested that in preparation of a mandate, the Commission evaluates different environmental, health or safety costs from a sustainability perspective; that stakeholders should be consulted in the preparation of mandates; that environmental requirements are well defined to allow for assessment on whether a mandate has been fulfilled or not; and that national public authorities be encouraged to participate in mandated standardisation work.

1.5 Stakeholder Participation in the Standardisation Process

Q17 Should the emphasis of the efforts to improve the integration of environmental aspects be placed at the European or national level?

Supporting comments

Many respondents felt that standardisation should take place at the European level. It was more cost effective and avoided duplication of work at different levels. The national and international dimension, they said, were nevertheless important. The national, because this would be the level at which standards were implemented; and international, because of the growing importance of the global market.

Concerns

Some stakeholders, in particular NGOs, expressed concern that in their countries there was no mechanism guaranteeing that consensus achieved at the national level would be transferred to the European standardisation process. This raised the issue of how important it was that NGOs are sufficiently represented at the European standardisation level to complement any representation in the national standardisation committee.

Q18 Do you have practical suggestions for ensuring the effective participation of groups of stakeholders that have important input but that are difficult to reach?

Supporting comments

It was clearly demonstrated that stakeholder participation in standardisation varied from country to country. Suggestions were made as to improve the effective participation of the relevant stakeholders:

- by making publicly available the work programmes of the standardisation organisations;
- by increased financial support for some stakeholders;
- by limiting their participation to technical committees or working groups that are relevant from the point of view of environmental protection;
- by encouraging representatives from national public authorities to participate in the relevant standardisation work;
- by providing easier access to relevant data; and
- by providing appropriate training.

Concerns

Many respondents stated that the relevant stakeholders already participate in the standardisation process. Standards organisations were generally open to participation and opinions from all interested parties. Hence, the current system would not require any changes– those who are truly interested would already participate in it

Q19 How will more involvement of different stakeholders affect / change the standardisation process?

Supporting comments

Opinions concerning the participation of a wider group of stakeholders were mixed. One potential positive consequence would be that standardisation would be made more transparent, so that the interests of all affected parties could be represented. It would be particularly important for SMEs to ensure that standards reflected their needs and not just those of big companies.

Concerns

Some opinions noted that wider participation may slow down the process of adoption / revision of standards, which was already too slow. In particular, a further slowdown may occur in the initial phase when new stakeholders join the technical committees and working groups as they may not be familiar with all the procedures. Moreover, standardisation is a consensual process and some of the newcomers may have difficulties in accepting the need for compromise.

1.6 An international framework for greener standards

Q20 What implications does the international framework have for European policies in your view?

Supporting comments

Some respondents pointed out that national, island solutions risked becoming barriers to international trade and the integration of the Single Market called for the WTO Agreement on technical barriers to trade to be respected. Others stated that Europe could take a leading role and intellectual leadership in the development of certain environmental standards; and that for global transfer and use of European standards, comments from stakeholders outside Europe should be enabled. Close co-operation between international and European standards development via the principle of national mirror committees was considered important.

Concerns

A third country administration pointed out that developing countries may require special and differential treatment, as they will have difficulties in implementing international standards with specific environmental requirements.

1.7 Possible Incentives to further integrate environmental aspects in standards

Q21 Would it encourage standardisers to develop standards with an environmental dimension if there was the possibility to show compliance with environmental legislation?

Supporting comments

To demonstrate compliance with environmental legislation by using voluntary standards tends to be perceived as an incentive by industry, mostly against the background of the New Approach directives. But clearly, this is only seen as positive in instances where regulation is absolutely needed and legal incentives should not be introduced as a rationale for new, unnecessary legislation. Some respondents suggested that New Approach type legislation should be used for new areas such as energy using products or that existing directives for products should cover environmental requirements in the future.

Concerns

Some NGOs stressed that standardisation cannot and should not replace legislation. Other respondents asked for an advanced warning of new legislation, which would avoid wasting resources on standards in areas that are likely to be regulated in the foreseeable future. Many respondents felt a need for a clear distinction between voluntary standards and mandatory laws. The discrepancy between product related legislation affecting all competitors equally and EU environmental legislation, differing from member state to member state was mentioned.

Q22 Are you familiar with the information made available under the eco-labelling schemes? If so, is it of use for the production of European standards?

Supporting comments

Most of the respondents were familiar with eco-labelling schemes. However, the views on whether eco-labelling could be used in standardisation were mixed. Some stakeholders perceive eco-labels as a good reference point, clearly identifying most important areas of concern. Standards, however, should be less ambitious in establishing environmental performance, as they are to be accepted by all the stakeholders. Some of the eco-label criteria, such as water or energy use, could be easily adapted for standardisation needs. Certainly, data gathered during assessment of products for eco-labels should be used in the standardisation process.

Concerns

Concerns for using eco-label criteria in standardisation were mostly related to market relevance. Eco-label criteria are developed by a relatively limited number of market players and therefore should not be extended to the whole market. Eco-labels should remain as goals for front-runners only. Some respondents pointed out that environmental standards should be rather process than product orientated as this is the case with eco-labels. Also, the eco-label is more perceived as a marketing tool for a limited group of market players.

Q23 Would you use standards or purchase standardised products, processes and services that cover environmentally important performance?

Supporting comments

Many of the stakeholders said that this was already the case. Other factors, such as price and quality, however, must also be taken into account.

Concerns

Stakeholders expressing doubts pointed out that the impact on the environment is only one among many factors taken into account when purchasing products or contracting services.

Q24 Would awards provide an incentive to integrate environmental issues into standardisation?

Concerns

The majority of respondents were sceptical as to possible use of awards. If at all, awards needed to be accepted by the market rather than being introduced by a top-down approach. The effects of awards were considered limited as they tend to attract the participation of only the highly committed organisations, and therefore could have a divisive effect. However, the need to communicate achievements was noted.

Q25 Would you consider using databases? How would you use them? uld the availability of databases ease the integration of environmental aspects into standardisation?

Supporting comments

The overwhelming response was yes that databases were useful. However the format, usability, content, access rights and procedures to use them needed to be very carefully thought through. Otherwise it would just be additional to an already confusing amount of information and innovation could be stifled by old data. The data would be the main thing to think about. In particular its validation was important – especially when conflicting views were put forward. It was noted that if databases needed to be created they should be an aid to standardisers but not mandatory in their use. Resources and costs would also needed to be considered. The text of the working document needed to define databases: those that are specifically for standards issues and then databases in general which give information on materials and technologies

Q26 Can you think of other incentives than the ones presented here?

Supporting comments

Many respondents did not think that incentives were the primary issue of the overall debate on integrating environmental aspects into standards. The challenges went wider than that. Many noted that market driven / customer / economic incentives were the most likely to succeed. incentives were developed this should be done with the stakeholders affected by them.

Q28 Will this Communication on the integration of environmental aspects into European standardisation help you or your organisation in your work?

Supporting comments

Responses to this question concentrated rather on the scope of the Communication and its final shape. For some stakeholders, it clarified the discussion on environment and standardisation and helped them to raise awareness and promote the systematic use of existing tools.

Q29 What could be the positive and negative consequences of this Communication for your work?

Supporting comments

Positive consequences identified by stakeholders included:

- raising awareness;
- easier dissemination of good practices;
- better co-operation between the experts;
- support for existing efforts.

Some respondents said that the Commission should indicate the level of environmental protection it hoped to be achieved by means of standardisation.

Concerns

Some stakeholders, mainly from the business community indicated that a negative consequence might be a deviation from the original purpose of standardisation: the production of technical documents for trade.

Q30 Please give any positive and negative examples of the integration of environmental aspects into standardisation?

Supporting comments

The majority of stakeholders who gave examples pointed out that the integration of environmental aspects into standardisation is already happening. The positive examples they mentioned included the work of CENELEC where a new guide for the integration of environmental aspects was developed in TC 20, and the two international guides already in place (IEC guide 109 and ISO TR 14062).

Concerns

The process of adding new requirements in the standardisation process should be considered and monitored carefully, otherwise it may lead to contradictory requirements that cannot be dealt with by the consensual standardisation process. Also, if the environmental targets/requirements are too ambitious in the beginning, it may discourage stakeholders and hamper the entire standardisation process. As negative examples, some of the stakeholders perceived both the mandate and the existing European standards for packaging. Another issue raised by some stakeholders was that the inclusion of environmental requirements would widen the gap between international standards and European ones, thus creating barriers to trade.

1.8 Overall Conclusions

The internet consultation broadly confirmed the views voiced at the stakeholder meeting on 16 July. These are that:

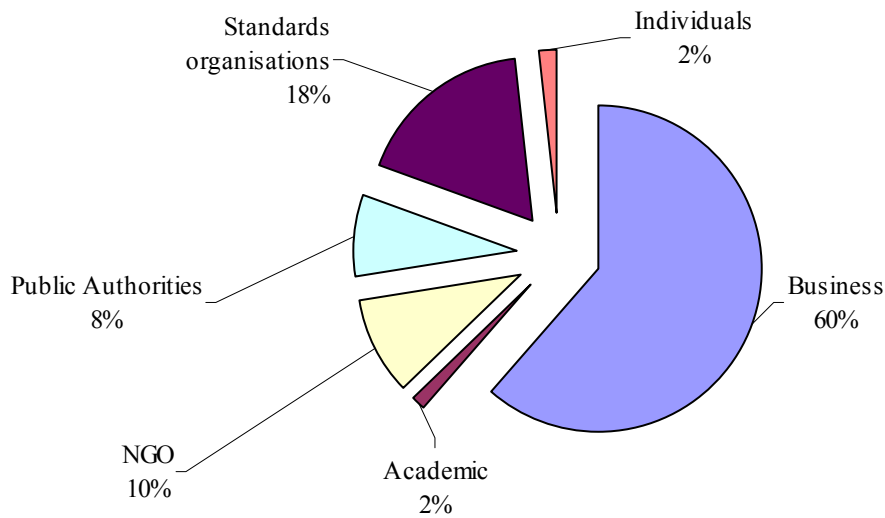
- aim and scope of the future communication are relevant and appropriate;
- all key issues have been identified, and it is important to clarify the relationship between voluntary standards and mandatory legislation;

- there are enough tools to address environmental issues in standardisation. However these require time, expertise and resources if they are to be used systematically. All stakeholders must address this challenge;
- the Commission and Member States should jointly play a role in the financing for an effective participation of all interested stakeholders in the standardisation process;
- priorities should be set, primarily for efficiency purposes, on where to start with the integration of environmental aspects into standardisation; whilst the Commission could flag interest areas by way of a mandate it should be left to the standardisation stakeholders to decide whether and how to deal with them;
- training of experts and the use of databases with relevant environmental information were considered the most instrumental incentives to incorporate environmental aspects into standards whereas the idea of awards was not supported;
- the international framework for standards and technical regulations must be respected to avoid unnecessary trade barriers, but the European standardisation system should take a certain leadership role in the development of specific environmental standards;
- the progress made with the integration of environmental issues into European standardisation should be reviewed every five years.

1.9 General Statistics

Between July and September more than 5800 hits on the website were reported. Over 60 written responses were then received. Replies to the questions came from 10 EU countries: Belgium, Denmark, Finland, France, Germany, Italy, Netherlands, Spain, Sweden and the UK. A contribution was received from China. Although representatives from the acceding countries participated in the stakeholder meeting of 16 July, only one written response was received from them. Most of the comments came from pan-European business and NGO organisations. The business sector (individual enterprises and business organisations) was the most active contributor to the consultation, which reflects that standardisation is considered a voluntary and market driven activity. A detailed breakdown is shown below:

Participation by stakeholder



Type of stakeholder	
Business	61%
Academic	2%
NGO	10%
Public Authorities	8%
Standards organisations	18%
Individuals	2%

List of contributors

- (1) AeA Europe
- (2) AEN GETI
- (3) AENOR Asociación Española de normlización y certificación
- (4) AIM, the European Brands Association
- (5) AmCham
- (6) ANEC
- (7) ANIE
- (8) Association Léo Lagrange pour la Défense des Consommateurs
- (9) AVBB
- (10) BEAMA
- (11) BSI British Standards Institution
- (12) Building and Sharing Partners (B-Sharp)
- (13) BUND e.V Bundesministerium für Wirtschaft und Arbeit (Germany)

- (14) CEMPC Council of European Producers of Materials for Construction
- (15) CEN
- (16) CENELEC
- (17) CIAA Confederation of the food and drink industry of the EU
- (18) Comitato Elettrotecnico Italiano – CEI
- (19) Confederation of Netherlands Industry and Employers VNO-NCW
- (20) Construction Products Association
- (21) Co-operative Group
- (22) CYS Cyprus Organisation for the Promotion of Quality
- (23) Danish Standards Association
- (24) Danish Trade Association of International Transport (ITD)
- (25) Dansk Industry - Confederation of Danish Industries
- (26) Department of Trade and Industry (UK Government)
- (27) DIN
- (28) ECOS
- (29) EICTA - European Information, Communications and Consumer Electronics Technology Industry Association
- (30) ENEA Italian National Agency for New Technologies, Energy and the Environment
- (31) Environmental Authorities of Belgium
- (32) EUPC RecyTrade – Plastics Recycling Market
- (33) Eurofer & Eurometaux
- (34) Europacable
- (35) European Composite Industry
- (36) European Emulsion Fuel Manufacturers' Association (EEFMA)
- (37) European Heating Industry
- (38) Europen
- (39) FIEEC
- (40) Finnish Forest Industries Federation
- (41) Finnish Industry and Employers confederation
- (42) Finnish Ministry of the Environment
- (43) Finnish Standards Association SFS
- (44) Five Winds Int
- (45) France Télécom Délégation à l'Environnement et au Développement Durable
- (46) Friends of the Earth (Germany), BUND e.V.
- (47) General Administration of Quality Supervision, Inspection and Quarantine (People's Republic of China)
- (48) German Commission for Electrical, Electronic & Information Technologies of DIN and VDE
- (49) German Federal Ministry of Environmental Protection
- (50) IKEA
- (51) National House Building Council
- (52) NEN (Netherlands Standard Institute)
- (53) ORGALIME
- (54) Ragnar Sellberg Foundation
- (55) RAL Quality Assurance Association for the demanufacture of refrigeration equipment containing CFC
- (56) Red Eléctrica de España
- (57) SBGI - The Trade Association for the UK Onshore Gas Industry
- (58) SIS (Swedish Standards Institute)
- (59) Sony International (Europe) GmbH
- (60) Swiss Agency for Environment, Forest and Landscape
- (61) Telecom Italia - Network Department
- (62) The European Natural Gas Vehicle Association (ENGVA)
- (63) Umwelt Bundesamt (Germany)
- (64) UNICE
- (65) Universidad Politécnica de Valencia
- (66) University of Environment and Public Works Greece
- (67) VCI
- (68) Zentralverband Elektrotechnik- und Elektronikindustrie (ZVEI) e. V.

Annex 3: Publicity

Publicity actions

The internet consultation was announced by means of the multi-stakeholder meeting on the 16 July 2003. Subsequent news updates, to almost 4.000 subscribers on the ENTERPRISE Europe on-line service, were sent (in July and August 2003) all of which showed the links to the various sites of the public consultation

Conclusion

Overall, the public consultation was well attended/visited. The initiative has drawn sufficient attention from a broad range of stakeholders.