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**COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND
THE EUROPEAN PARLIAMENT**

Integration of Environmental Aspects into European Standardisation

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19.5.2003

INTEGRATION OF ENVIRONMENTAL ASPECTS INTO EUROPEAN STANDARDISATION

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INTEGRATION OF ENVIRONMENTAL ASPECTS INTO EUROPEAN STANDARDISATION

I. INTRODUCTION

Technical standards contribute to economic and social development. Also, standardised goods and services can have an impact on the environment. For instance, standards can affect how a product is made, used, maintained and treated at the end of its life. Standards can help to sample, test and analyse products or materials in relation to their environmental behaviour or conditions. Hence, standardisation can make a positive contribution to the protection of the environment. Whilst requirements set out in technical regulations are mandatory, there are many thousands of technical standards that are developed voluntarily by companies, by ad hoc structures like fora and consortia, or under the umbrella of formal standardisation bodies.

Box 1: The quiet Force of Standards

Today, a majority of goods and services around us have been standardised. This goes unnoticed in most of the cases. “They are mostly quiet, unseen forces, [...] that ensure that things work properly, interactively, and responsibly. How standards come about is a mystery to most people, should they even ponder the question.”¹

In the European standardisation system, standards have developed in areas where the concerned stakeholders identified and pursued common interests in the definition of

Box 2: The European Standardisation System

The European standards organisations are CEN (European Committee for Standardisation), CENELEC (European Committee for Electrotechnical Standardisation) and ETSI (European Telecommunication Standardisation Institute). Directive 98/34/EC recognises these bodies for the development of European standards. The principles of relationship and cooperation between CEN, CENELEC, ETSI and the European Commission and the European Free Trade Association are laid down in general guidelines. A revised version of these guidelines was adopted on 28 March 2003 (OJ C 9 of 16.4.2003).

technical solutions. The stakeholders have already and continue to invest significant resources in terms of experts’ time, technical know-how and meeting expenses into the process. A main driver for the development of European standards is their uniform applicability throughout the European Single Market, as they replace national standards. Also they are,

whenever possible, based on international standards which facilitates international trade. An additional incentive for the creation of European standards has been, for some product areas, a harmonised and stable legal framework that allows European standards to develop possible technical solutions to demonstrate compliance with the law.

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II. EUROPEAN POLICY FRAMEWORK

The EC Treaty aims at a harmonious, balanced and sustainable development of economic activities and a high level of protection and improvement of the quality of the environment.¹ It reinforces the principle of integration of environmental requirements into other policies, recognising that it is key in order to achieve sustainable development.² The Community seeks a coherent approach to the pursuit of its objectives in relation to the Single Market and the environment, whilst also honouring its international obligations.

European Standardisation is a tool that has been used frequently in the implementation of Community policies.³ Consequently, there has been an increasing focus on the role it can play in protecting the environment and supporting sustainable development.

In various political documents the Council and the European Parliament have pointed out the wish and need to consider environmental aspects in standardisation.⁴ Also, the Commission issued a Green paper on Integrated Product Policy⁵ in 2001, followed by a White Paper in 2003⁶ and referred to standardisation as a potential tool to reduce the environmental impacts of products from the mining of raw materials to production, distribution, use and waste management. To put Integrated Product Policy into practice, the Commission plans to adopt a proposal⁷ on the eco-design of energy-using products - European standards could be very helpful in establishing methods for measuring or, in some cases, better describing environmental parameters relevant for those products.

The Commission, specifically, proposed to promote the idea of the integration of environmental protection requirements in standardisation activities in the Sixth Community Environment Action Program⁸ that was adopted by the Council and the European Parliament in 2002.

In the same year, the Commission announced the development of a paper (*i.e.* the present communication) on standardisation and the protection of the environment.⁹ The Council welcomed such intention in 2002.¹⁰

¹ Article 2 of the consolidated version of the Treaty establishing the European Community

² Article 6 thereof

³ For an overview of sectors using European standards to implement policy see COM (2001) 527 final or visit the website: http://europa.eu.int/comm/enterprise/standards_policy/index.htm

⁴ e.g., European Union Strategy for Sustainable Development: follow-up to the environment related aspects of the European Council of Gothenburg – Council Conclusions, document 15280/01;

⁵ COM (2001) 68 final

⁶ COM (2003) 302 final

⁷ Reference

Decision No 1600/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Community Environment Action Programme, OJ L 242 of 10/09/2002, p. 1 - 15

⁹ COM (2001) 527 final

¹⁰ Council Conclusions on standardisation of 1st March 2002, OJ C 66 of 15.3.2002

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III. AIM AND SCOPE

Sustainable development is a priority for the EU, and it strives towards a balance of economic, social and environmental considerations¹¹. European standards often deal with aspects of trade, quality, health and safety of products, processes or services. By additionally considering environmental aspects in European standards, standardisation could make a positive contribution to sustainable development and the relevant implementing policies, such as Integrated Product Policy, adopted by the EU. There is also a growing number of European standards for test and measurement methods required for specific environmental purposes.

Sustainable steps from standardisation stakeholders are needed to systematically integrate relevant environmental aspects in European standards making. Therefore, the conditions needed under which European standardisation can positively contribute to the protection of the environment merit closer attention.

This communication from the Commission presents some key issues in this regard:

1. raising awareness and environmental thinking;
2. using existing tools and standards for the environment and creating new ones;
3. setting priorities;
4. stakeholder participation;
5. respecting the international framework; and
6. possible incentives.

The European standardisation system and its stakeholders are invited to reflect and act on these issues with a view to advancing the standardisation system and to making it more responsive to the environmental dimension whilst respecting all other dimensions of sustainable development. The stakeholders addressed in this communication are

- European standardisation organisations and their national members;
- national public authorities;
- industry and business associations; and
- non-governmental organisations.

The Commission invites the European Parliament and the Council to endorse the key issues and objectives set out in this communication. In the light of the voluntary and independent nature of European standardisation, the Commission proposes to re-assess the subject in the light of progress made.

¹¹ COM (2001) 264 final

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IV. DEVELOPMENTS IN EUROPEAN STANDARDISATION

Some developments European standardisation has undergone have helped to increase the potential for it to be a useful tool to protect the environment.

– Growing number of European standards

To start with, the growth in the number of European standards has been considerable. Today, CEN offers some 7000 European standards for a vast range of sectors. In the electrotechnical field, there are some 3300 European standards from CENELEC, most of which are based on the international standards of the International Electrotechnical Committee IEC. In the telecommunications area, ETSI offers about 3200 standardisation documents (ENs and ETSs) to its users. About 1200 European Standards (ENs) are published every year by these Organisations. In 2003 a total of about 13.500 European standards exists.

– Growing range of sectors using European standards

The scope of issues dealt with by European standardisation has also increased in importance. Standards developers today touch upon issues that are environmentally sensitive such as product design, energy efficiency, and solutions for end-of-life stages of parts and components and technical and management processes. On top of that, there is a growing demand for environmental test and measurement methods. European standards are produced for issues such as wastewater engineering, soil improving techniques, and the measurement of air pollutants.

– Growing take-up in European legislation

In the context of the EC New Approach directives for certain product areas, 2165 harmonised standards have become voluntary solutions to demonstrate compliance with the legal requirements. The incentive to define voluntary solutions for compliance with the law requires European standardisation organisations to respect certain principles of accountability. These are for instance, national inquiry and voting and the representation of stakeholders in the standardisation process. Under certain circumstances, stakeholders may be interested in developing new standardisation deliverables such as workshop agreements. These “standardisation products” can be established quicker and usually represent the consensus of a more limited group of stakeholders.

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V. KEY ISSUES

1. ENVIRONMENTAL THINKING

Care for the environment, optimal use of resources and efficient energy consumption have become a widely recognised necessities for economic operators, but also for citizens. In other words, environmental thinking needs to become part of everyday life. Standardisation as a vehicle to implement business activities should be receptive to the need for environmental thinking, albeit, it is never the standard itself that has an impact on the environment, but the products, processes and services covered by standards. Depending on the way a standard is written, the provisions included and those omitted, the environmental impact of the issue to be standardised is to a large extent determined. Consequently, the experts writing or revising the standards need to be aware of environmental considerations and possible environmental impacts. A lot will depend from the environmental expertise available in the standards development process, and the willingness to *systematically* take into account environmental issues.

1.1 Commitment to take the environment into account

Standardisation can contribute to sustainable development if a sustainable change of mind and culture amongst the stakeholders occurs, so that environmental aspects are systematically taken into account along with economic and social considerations. Since standardisation is a highly specialised business, taking the environment into account must become a commitment of all stakeholders and their technical experts elaborating the standards. However, it is not always possible for stakeholders to overview all up-to-date environmental know-how. Therefore, awareness and encouragement to use environmental know-how in standardisation needs to be promoted. Many experts represent business interests in the standardisation process and the business community could contribute to raise awareness by taking appropriate measures. The aim of such tools, regardless of their format, is to sharpen the mind of standardisation stakeholders for environmental concerns and to produce standards that are more responsive to the environment.

1.2 Consideration of possible environmental impacts from the beginning

Even though there is no single or simple answer on how to proceed to take the environment in European standardisation into account, the first step naturally should be to find out in which way a standardisation program or project may impact on the environment. Considerations on the possible environmental impact of standards do not necessarily trigger complicated and time-consuming research or study activity,

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nor do they mean that a fully-fledged life-cycle assessment needs to be carried out. What matters is a systematic approach to increase environmental thinking at all stages of the standardisation process.

Despite not being exhaustive, energy and material consumption, emissions to air and water and soil are examples of environmental impacts that should be taken into account in standards development. Equally aspects like release of hazardous substances, risks to the environment from accidents or misuse, waste and noise creation should be considered if relevant. Naturally the environmental aspects that are relevant and should be taken into consideration depend on the type and the aim of the standard. The results of such an early checking of environmental impacts of standards programs or projects could be useful to standards users, in particular for manufacturers or procurers. This is why relevant material on which environmental aspects have been considered at which stage of the development of a European standard should be made available in an appropriate format.

1.3 Consideration of possible environmental impacts at the revision stage

Adverse environmental impacts might be significantly reduced by the application of new knowledge. Because the rate of innovation, not least environmental innovation, is high, review of standards on a regular basis is essential. Standards are generally reviewed every five years. The regular review process seems to be a good trigger to start looking into the environmental aspects of already existing standards. During such revision procedures environmental aspects should, like at the beginning of new standards programs or projects, be considered systematically. Again, there may be value if environmental considerations dealt with during the revision of European standards were made accessible in an appropriate format.

1.4 Training

Technical training may be a useful way of disseminating environmental know-how and raising awareness. Therefore, further information and training about how to take the environment systematically into account is important. Information on appropriate environmental tools and specific information sources is not only important for non-governmental stakeholders representing environmental interests in standardisation, but also for experts from industry and business. Hence, it may be of mutual benefit if regular information on relevant information sources and tools were shared between the standardisation community, universities and research institutes.

2. USING EXISTING TOOLS AND STANDARDS FOR THE ENVIRONMENT AND CREATING NEW ONES

The European standardisation organisations have already started to develop some tools for better considering environmental aspects. The list of initiatives described

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below is not exhaustive. Their further development and systematic use seem promising and should be encouraged. To enhance the market-relevance of standards, it is also important that standards users such as manufacturers and procurers indicate which environmental aspects they want to see considered by standards. Relevant associations of standards users can play a role in helping to identify relevant aspects.

2.1 Existing tools

Some of the European standardisation organisations established special groups for the environment. They tend to function as environment-centered discussion platforms for experts, where recommendations can be drawn up for strategy development. The CEN Strategic Advisory Board for the Environment (SABE) and the CENELEC Working Group of the Technical Board “Environmental Standardisation” (BTWG 85-3) are good examples in this regard.

CEN has established a service function for environmental issues within their organisation - the CEN Environmental Help Desk (CEN EHD). It gives technical advice to standard writers through networks of environmental experts. A tool for standards developers that could be used to enhance transparency and to disseminate information about environmental considerations is the planned CENELEC “Environmental Database”. It will pool all environmental aspects dealt with by CENELEC in their standards.

There are also a number of guides and checklists on how environmental considerations can be integrated into standards (ISO Guide 64, IEC Guide 109..). These are either general or specific to individual sectors. The latter ones are particularly useful because they are written by experts from the sectors for experts from the sector.

2.2 Existing standards for the environment

Standards are tools for the diffusion of technical knowledge. Today, there are already many European standards that either directly deal with the environment or that take environmental aspects into account. Their use should be encouraged:

– Test methods for environmental purposes

The implementation of Community directives and regulations sometimes requires the development of European standard test methods, pollution measurement methods, pollution control methods, water analysis methods and test standards etc. Such standards enable a consistent implementation and enforcement of legislation throughout the European Union. Without standardised methods of measurement there would be no compatibility/comparability between

Box 3 : Mandate for sludges

The Commission has asked CEN to develop ‘horizontal’ standards for key environmental directives on sludge, biowaste and soil. The aim is to be able to apply each European standard for any of the directives. For example, a horizontal standard to test for potassium content could be used to test potassium levels in sludge **or** soil **or** biowaste.

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environmental quality data gathered throughout the EU.

– Standards dealing with environmental technologies

Standards dealing with environmental technologies have the most direct impact on the environment. The Commission has identified the potential of environmental technology for sustainable development¹² and has started developing an action plan to which European standards can contribute in many ways.¹³

Energy use is an area where European standards are helping to provide environmental benefits. There are, for instance, European standards projects dealing with the energy efficiency of electrical and gas appliances. In order to make these benefit the consumer, standards are developed which help to measure the performance of appliances. The relevant information on a device's energy use is displayed on a so-called energy label. This enables European consumers to make informed choices. Standards can also help to develop environmentally friendly ways of producing energy.

Box 4 : Combined Heat and Power or Micro-cogeneration

Micro-cogeneration is the simultaneous development of heat and electricity which can be done on site in the buildings that need it. Once available, the European standards will help further this technology in the market.

Increasingly standards are emerging which deal with key parts of product life cycles; an example of such dedicated work on environmental aspects of products is the IEC work on products declared "as-new". Some standardisation documents¹⁴ focus on integrating environmental aspects into product design and development and aim to help companies understand the reasoning and practicalities of eco-design. Also, there is a growing number of standards which are helping to deal with the end of life phase of products¹⁵.

Some standards have environmental benefits which are not immediately obvious. An example is standards for measuring the mesh sizes of fishing nets¹⁶. These will allow different countries to enforce international regulations and protect fish stocks. It is also argued that standards which are developed to support initiatives such as Intelligent Transport Systems will have environmental benefits as they will contribute to the reduction of traffic and all its negative environmental impacts.

– Environmental management standards

Environmental management is another example of a domain in which standards are needed for the sake of the environment. An Environmental Management System enables an organisation to assess, organise and continuously improve the impact of its activities, products or services on the environment. Consideration of the environment in organisations needs to be done in the same systematic way as quality assurance and

¹² COM (2002) 122 final of 13 March 2002

¹³ COM (2003) 131 final of 25 March 2003

¹⁴ e.g. ISO TR 14062

¹⁶ prEN ISO 16663 Fishing nets – Method of test for the determination of mesh size

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therefore environmental management system standards such as EMAS¹⁷ and EN/ISO 14001, are useful tools.

ISO 14000 is an internationally recognised series of standards for environmental management. The environmental management system standard ISO 14001 has also been adopted as European standard (EN ISO 14001). Other parts of the ISO 14000 series deal with issues such as life cycle assessment (LCA) of products (ISO 14040 series), environmental performance evaluators (ISO 14030 series), and environmental labels and declarations (ISO 14020 series). The standards of the 14000 series are management standards that do not apply to a specific sector or business type, but offer guidance on the fundamentals of environmental management such as definition, goal and scope setting.

EMAS incorporates EN ISO 14001 : 1996 as its basic management system but goes beyond ISO in terms of performance, transparency and credibility. Major differences are that EMAS requires the publication of an environmental statement (including information about the company and its environmental impacts) and that it is a public system under the control of the Member States.

3. SETTING PRIORITIES

Considering the substantial amount of standardisation projects, the costs to take part in the standardisation work and the scarce resources of stakeholders, there is a need for prioritisation. European standardisation organisations should set-up their policy of how to deal with environmental needs in their standardisation programmes. Likewise, the Commission should indicate environmental considerations in European standardisation mandates.

3.1 Priority setting by the European standardisation organisations

A simple way to identify standards programs or projects where the environment is affected is needed. It would allow the stakeholders to efficiently allocate their resources to standards projects of real interest and potential benefit to them. Such a system could also be used to attract technical comments, support and expertise. For instance, work programs and business plans of technical committees and working groups operated by the European standards organisations could provide indications on how their work relates to environmental aspects.

¹⁷ Regulation (EC) No 761/2001 of the European Parliament and of the Council of 19 March 2001 allowing voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); OJ L 114, 24.4.2001, p. 1 For more info see <http://www.europa.eu.int/comm/environment/emas>;

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3.2 European standardisation mandates

An instrument the Commission can use to flag priorities for European standardisation work is the European standardisation mandate. Mandates are used to invite for European standardisation activities in relation to policy goals, in particular, in relation to New Approach directives, but also in areas requiring specific environmental standards.

Already some years ago, the Commission stressed that where mandates are given, it is important to integrate essential issues, such as the protection of safety, health and the environment.¹⁸ Accordingly, the Commission needs to ensure that standardisation mandates invite for appropriate consideration of environmental aspects in standards development.

A specific instrument the Commission uses to invite for the setting of priorities in European standardisation work is the so-called programming mandate. In relation to environmental aspects in products, the Commission intends to issue a programming mandate concerning the future EU directive on eco-design of energy-using products¹⁹. Other possible mandates could deal with environmental friendly processes during the product life cycle.

4. STAKEHOLDER PARTICIPATION

The acceptability of standards depends to a large extent on the involvement of all stakeholders. The participation of civil society²⁰ 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 authorities. At the political level, the Council stressed the importance of involving all interested parties by inviting them to participate actively in the elaboration of European standards and to contribute to the management of the standardisation process.²¹ In practice, participation in the standards development process largely depends on the capacity of any interested party to provide technical input and to earmark resources for such work. Contributions to the programming of the European standardisation require a legitimate capacity of representing a constituency nationally and at European level.

¹⁸ COM (1998) 291 final, p.11

¹⁹ Reference of relevant COM document once published.

²⁰ e.g. stakeholders representing consumer, health, safety and environmental interests in standardisation.

²¹ Council resolution of 28 October 1999 on the role of standardisation in Europe; and Council Conclusions on standardisation of 1st March 2002

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4.1 The national dimension

The participation of environmental stakeholders in standardisation is very important, particularly at national level. The structure of the European standardisation organisations CEN and CENELEC is based on national delegations that must take forward national positions comprising the views of all stakeholders to the European level. The national delegation principle offers stakeholders the possibility of participating in standardisation activities without extensive travel effort and to express technical comments in their own language. Achieving consensus between stakeholders at national level followed by the establishment of consensus between national positions, generally results in standards that are regionally or internationally accepted.

This structure in the European standardisation system implies that the civil society, including environmental stakeholder groups, necessarily needs to participate at the national level. Considering that in many cases civil society has no economic profit to gain from participating in the standardisation process, these groups need financial and other relevant support from the member states to participate effectively.

Other important standardisation stakeholders are public authorities. Today, national authorities in Member States are to some extent involved in standardisation activities. However, a more direct and active involvement of national public authorities in standardisation may be beneficial. Also, a dialogue between the various (national and local) authorities involved may facilitate the integration in standardisation of environmental and health and safety considerations with economic ones.

An exchange of experience and best practices between member states regarding the representation of environmental interests at the national standardisation level, the support granted to the relevant stakeholders and the involvement of national authorities in standardisation should be envisaged on a regular basis. Based on national activity reports, the Commission, together with the member states, could then review the situation for progress made, good practices established, etc.

4.2 The European dimension

At present, there is a lack of environmental stakeholders' involvement at national level in many member states. To mitigate the current situation, the Commission awarded a contract for the representation of environmental interests at the European standardisation level. The Commission is also financially helping other stakeholders to participate in standardisation at the European level such as consumer (ANEC) and worker's groups (TUTB) or organisations dealing with small and medium sized enterprises (NORMAPME). These groups have attained associate membership or equivalent status with the European standardisation organisations.

The Commission awarded the contract for environmental interests to a consortium of environmental organisations called ECOS, the European Environmental Citizens Organisation for Standardisation²². At a European level, ECOS will have an important role to play by

²² 'Service contract for the integration of environmental requirements in the European standardization process' OJ 2002/S 173-137828

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- attracting new members among NGOs participating in standardisation at the national level;
- establishing a network of experts and working procedures that achieve co-ordination with and transparency amongst the ECOS members thus better influencing the decision-making process at national level;
- establishing a technical work programme and by identifying the technical committees where they want to participate in standardisation activities;
- training experts and appropriate staff on standardisation principles and procedures;
- ensuring participation of their experts in the technical committees and working groups identified in their work programme.

ECOS has started work in November 2002. Applications for associate membership with CEN and for social and economic partner status in CENELEC are under way. After an initial phase, the Commission expects that ECOS can play a significant role in the integration of environmental issues into standardisation and intends to support it further in its activities.

5. INTERNATIONAL FRAMEWORK

Trade has been a main driver for standardisation since ancient times. From a global perspective, more and more issues require global technical solutions and particularly, internationally traded goods need international standards whenever possible.

5.1 WTO rules

The multilateral trading system established under the WTO, and in particular its Agreement on Technical Barriers to Trade (TBT), stipulate the use of voluntary international standards as a basis for mandatory technical regulations for goods. The WTO rules respect the sovereign right of each member to define the level of protection deemed appropriate to meet legitimate objectives such as the protection of health and the environment, subject to not applying them in an arbitrary or discriminatory manner. Hence, WTO members do not need to use international standards if they are ineffective or inappropriate for the fulfilment of legitimate objectives. This rationale builds on the paradigm that essential protection requirements (legitimate objectives) should be defined by legitimated public authorities whilst recognizing that technical solutions for the fulfilment of such objectives should preferably be developed by the private stakeholders themselves in international standards.

5.2 International standards

Due to associated benefits in terms of trade, market access and dissemination of technologies, European standardisation is closely linked to international standardisation. Consequently, European standards are based on international standards, if international standards are available and if they are fulfilling the EU's

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protection requirements.²³ A significant part of CEN standards are taken over from the International Standardisation Organisation (ISO) and the majority of the output of CENELEC is developed in the International Electrotechnical Commission (IEC). Via the agreements concluded between the European and international standardisation organisations, there is also the possibility that European standards are offered to the international standardisation organisations for adoption as international standards. Consequently, European standards dealing with the environment or integrating environmental aspects can trigger relevant international standards.

It is equally important that the national standardisation organisations who participate in the development of standards by the ISO and the IEC deal with environmental considerations so that international standards contain an environmental dimension, too. There are some international tools for the inclusion of environmental aspects in product standards such as the ISO Guide 64 (implemented by CEN as Guide 4)²⁴ and the IEC Guide 109 (CENELEC Guide xx). Another area where international standards can enhance market transparency and trade opportunities for environmentally friendly goods are eco-labelling schemes²⁵ where currently a plethora of national schemes exist.

VI. POSSIBLE INCENTIVES

Standardisation is a voluntary process. The Commission acknowledges that standardisation has an effect on a number of areas of public concern, including the environment, that standardisation can play a role in public policy, and that it can support legislation. This understanding has recently been reconfirmed by the general guidelines for the cooperation between CEN, CENELEC and ETSI and the European Commission and the European Free Trade Association.²⁶ The guidelines display a climate of mutual respect and trust.

The European standardisation organisations and their stakeholders have repeatedly responded to European policy developments.²⁷ The Commission now calls upon them to undertake the sustainable steps to ensure the integration of environmental aspects in European standardisation. To stimulate further improvement and sustainable steps regarding the environmental dimension in European standardisation, the Commission compiled the non-exhaustive list of incentives that is presented below.. Stakeholders are invited to implement activities in this regard and report on the steps they have taken. The Commission will report on the activities it has taken in due course.

²³ SEC (2001) 1296 European policy principles on international standardisation

²⁴ <http://www.cenorm.be/boss/supmat/refdoc/cm004.htm>

²⁵ cf. Commission submissions to WTO Committee for Trade and Environment and to the Committee for Technical Barriers to Trade: WT/CTE/W/225, G/TBT/W/175-WT/CTE/W/212

²⁶ OJ C91 of 16.4.2003

²⁷ cf. COM (2001) 527 of 26.9.2001

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6.1 Legal incentives

For certain product areas European legislation has started to introduce environmental performance requirements as promoted by the Commission's concept of Integrated Product Policy²⁸. Eco-design of end-use equipment²⁹ is an example of a future directive that aims at ensuring free circulation of goods with a certain environmental performance. As manufacturers are offered the possibility to demonstrate compliance with the harmonised legal requirements by using harmonised voluntary standards, it is expected that all stakeholders will actively participate in the development of relevant European standards, and that relevant harmonised standards will be developed in a timely manner. Hence, standards will become market based voluntary tools to demonstrate compliance with the mandatory requirement to take the environmental dimension in the design and life-cycle of products into account.

The European framework for environmental law is different from harmonised rules for the Single Market. In the environmental field, European legislation sets out minimum requirements. Member states can adopt more stringent rules. The incentive to produce European standards for implementation and/or compliance with a such a legal framework are less obvious since European standards would not meet the (differing) national implementation laws.

At the European level, there have been many efforts to improve existing regulation and to better regulate via the Commission's better regulation package. As a general principle, it is agreed that technical regulations should be stable, performance-oriented, and innovation friendly. It is also recognised, that voluntary standards play an important role in this context. Standards are a more flexible tool to adapt to innovation and they can help to keep legislation clear off too detailed technical prescriptions. However, the development of European standards takes time and resources from the stakeholders and therefore it is important for the stakeholders that the regulatory framework is stable and predictable. Otherwise their investment is at risk.

It is therefore important that there is a well-defined and stable area within which standardisation stakeholders are permitted to search for appropriate technical choices. It would not attract the stakeholders to work, in other words to invest efforts, on a subject where unnecessary legislation (new or revised) is imminent.

6.2 Setting the benchmarks

Several eco-labelling schemes, the EU eco-label³⁰ as well as different national schemes focusing on the environmental quality of products are already in place and cover a broad range of products. In the framework of these schemes more than 100 criteria documents have been developed. Each year, more and more products are covered and more and more companies join the different schemes. The criteria fixed

²⁸ COM (2003) 302 final of 18.06.2003

²⁹ reference of COM doc

³⁰ Regulation (EC) No 1980/2000 of the European Parliament and of the Council of 17 July 2000 on a revised Community Eco-label Award Scheme For more info see

<http://europa.eu.int/comm/environment/ecolabel/index.htm>

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by these tools are developed through a demanding process with full stakeholder involvement, taking into account the whole life cycle of the products under consideration and through a third party verification process, in particular for the European Eco-label. This unique knowledge on the environmental quality of products could be used to improve the integration of environmental aspects into the standardisation process and pilot projects could be initiated with a view to achieve a cross-fertilisation between eco-labelling schemes and standards.

Eco-labelling schemes can significantly differ from each other as they are – with the exception of the EU eco-label - often targeted at local, national or niche markets. Eco-labels and other environmental marking schemes establish ambitious compliance targets for products and are intended to attract and distinguish the best environmental performers. Standards, however, cover performance and/or design requirements for the widest possible range of products, services or processes as they represent the “state of technique”. A graduated system of environmentally important performances integrated in European standards would therefore contribute to improve the mainstream of products, processes and services in full compliance with Single Market principles: European standards are used throughout the (expanding) EU where they replace national conflicting standards. Also, they are used in the European Economic Area and in many other countries.

6.3 European Awards

To deal with environmental technologies or to consider possible environmental impacts systematically is a rather recent field for European standardisation. In the past, quality and safety issues have attracted most of the attention of the stakeholders. As for the promotion of quality and safety, the creation of European awards for the best environmentally friendly European standards can help to promote and disseminate best practice in European standardisation.

6.4 User friendly databases

The creation of friendly to use databases³¹ giving potential environmental risks (and/or related health risks) for materials, products or processes could facilitate the uptake of this knowledge and its integration into the resulting standards. It would also avoid multiplication of cost in standards development.

VII. CONCLUSIONS

This communication from the Commission sets out some key issues for European standardisation to contribute to environmental protection and sustainable development. The aim of this communication is to encourage all stakeholders of the European standardisation system to undertake sustainable steps to take the environment into account, bearing in mind that impacts on the environment produced

³¹ CENELEC has initiated such a database

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by processes, products and services can be improved through appropriate provisions in standards.

The Commission considers it important that

- Member states support the participation of environmental stakeholders in national standardisation organisations, and that they encourage representatives from public authorities to actively engage in relevant standardisation work;
- European standardisation organisations make information available on how they set priorities in dealing with environmental issues, and that they systematically apply and further develop tools for the integration of environmental aspects, if possible, in co-operation with the relevant international standardisation organisations;
- all stakeholders, in particular industry and business, commit themselves to promote environmental thinking in standards making for all stages of the life cycle of products, processes and services.

The Commission will

- contribute to the promotion of environmental thinking in standardisation, continue to support the representation of environmental interests by civil society at the European standardisation level;
- issue standardisation mandates that invite for the integration of environmental aspects;
- where appropriate, aim at a standards-receptive European legal framework, amongst others also in the environmental field.

Over time, these elements, in combination with market pressure and an appropriate regulatory framework will ensure that the environment can be effectively taken into account in European standardisation. Consequently, all stakeholders and interested parties should exchange experiences and maintain a dialogue on this topic. The Commission will assess the situation based on progress made by the different parties and develop further its policy.

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