

CEN and CENELEC Action Plan in response to the European Commission Standardization Strategy

CEN and CENELEC welcome the new European Standardization Strategy which reinforces the common efforts to deliver on the ambitions of the twin green and digital transition and upholds the uniqueness of the European standardization system, market-based and inclusive, based on the national delegation principle. A coherent, efficient and strong public-private partnership is instrumental for European leadership.

In line with this, CEN and CENELEC reaffirm the importance of strengthening the EU's leadership in standard-setting to support the global competitiveness of European industry and society, whilst leveraging the agreements in place with the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) respectively. The European standardization model is unique and offers many best practices to enable Europe to deliver a resilient, green and digital Single Market and be a key player in global markets.

The CEN and CENELEC Action Plan lists the **key points for attention** in response to the 5 pillars of the European strategy and the 22 recommendations and actions proposed, as well as **identifies 5 actions** to work together with the European Commission to facilitate the implementation of the European strategy.

Many of the contributions are intertwined with the CEN and CENELEC [Strategy 2030](#) projects, and have been enhanced with contributions received from the CEN and CENELEC Boards, the CEN-CENELEC Industry Advisory Forum (IAF), Societal Stakeholder Group (SSG), the SME-Working Group, the European Policy Hub (EPH) as well as the national practices in the CEN and CENELEC Members.

In addition to this response to the European Commission, CEN and CENELEC Members agreed to keep a rolling operational Action Plan to track the different actions undertaken in support of the European strategy.

Pillar 1: Leveraging the European standardisation system – to deliver on the twin green and digital transition and support the resilience of the single market

Europe must fully uphold its role as a standards-maker as it has been for decades, while ensuring that European leadership is enhanced in challenging sectors of the emerging green and digital economy, where international competition is fierce. The CEN-CENELEC Strategy 2030 Goal 1 identified the importance for EU and EFTA to recognize and use the strategic value of the European standardization system, framed by the green and digital transition. This goal stressed the need for European policies to rely on a strong standardization system, agile and flexible, focused on the Single Market priorities, being able to anticipate future needs across all industrial eco-systems.

CEN and CENELEC welcome the commitment of the European Commission to establish a **High Level Forum** to anticipate and ensure the alignment of EU policies, business priorities and standardization on strategic topics to be reflected in the **Annual Union Work Programme** which will shape the CEN and CENELEC Annual Work Programme. The inclusiveness that characterizes the European standardization system must be reflected in the composition and set-up of the High Level Forum.

Furthermore, when defining the HLF Working Groups, the following approach is proposed:

- *Horizontal*: Interfaces able to talk across sectors (e.g. Data for Energy, E-Mobility and not only EV for instance)
- *Per large sector*: Requirements and needs for specific vertical sectors (e.g. Power Electric Sector, Electrical Building Electrification)

The strategic objectives under this pillar must be further reinforced by the work of the EC-ESO TF 'Timely European standards for a Green and Digital, Single and Global Market' and its Action Plan which will be made publicly available after summer 2022. These actions are essential to the well-functioning of the system that underpins the deployment of the strategy, and accelerates the development and adoption of standards, implementing innovative and concrete solutions to timely deliver and cite standards in the **Official Journal of the European Union**.

CEN and CENELEC welcome a consistent and coherent EC approach to widen the application and use of the New Legislative Framework, as an innovation friendly legislation. The role of the **EU excellence hub** with clear allocation of responsibilities and accountabilities vis-à-vis the High Level Forum, coordination with the ESOs, and EC political concertation will certainly strengthen the efficiency of the standardization process and reinforce market uptake of standards in support of the twin transition.

We are ready to support the EC to make the HLF and the EU excellence hub a success through direct participation in the HLF, and we are keen to engage in shaping both platforms, building on the long standing experience in European standardization, and on the bottom-up aspects of stakeholder driven standardization.

The strategy also sets out to review existing standards and identify needs for revisions or development of new standards to meet the objectives of the **European Green Deal and Europe's Digital Decade**. While fully sharing the relevance of this objective, it is important to emphasize the efforts and investment necessary to meet this target. We count on a close collaboration with the EC to deliver while making the best use of the available resources.

Action → CEN and CENELEC are ready to engage with the EC (DG GROW and DG JRC) to develop together a 3D reference architecture project for the Green and Digital transition standards, as well as identify the requested investments to deliver this project.

Pillar 2: Upholding the integrity, inclusiveness and accessibility of the European standardization system – putting good governance principles in place

CEN and CENELEC Members have been consistently improving the integrity, inclusiveness and accessibility to the European standardization system. The CEN-CENELEC Strategy 2030 Goal 4 clearly sets out for CEN and CENELEC system to do *what it takes* to be the preferred choice for standardization in Europe.

We are continuously monitoring the governance and overall robustness of our system, taking a consistent approach at both European and national level, sharing best practices and lessons learnt between national Members, and providing support across all NSB and NC to fulfil all the requirements. In addition, the CEN and CENELEC Members have clear obligations described in the Internal Regulations part 1D, and in particular those concerning Openness and Sustainable Development. To ensure these criteria are upheld at all time, all CEN and CENELEC Members are subject to regular (peer) assessments under the leadership of the Membership Relations and Monitoring Committee (MRMC) that evaluates the fulfilment of membership criteria and identifies best practices for the continuous improvement of the system. We call on the EC to build on this practice and consider existing mechanisms when addressing the **peer review process**.

This is further reinforced by the national delegation principle which is in line with the amendments proposed to Regulation 1025/2012 to which CEN and CENELEC, and 23 of our Members contributed. Anticipating the **evaluation of Regulation 1025/2012**, CEN and CENELEC stress the importance of an efficient public-private-partnership and reconfirm that Regulation 1025/2012 is fit for purpose and defines a robust framework for European standardization.

A point of concern is the proposal of a horizontal approach to develop **technical or common specifications**. Emphasizing that the NLF is identified as a good regulatory practice, innovation friendly, defining the uniqueness of the European standardization model – voluntary standards supporting the implementation of regulations – the development of technical specifications that do not follow a market driven approach, or build on the valuable and diverse expertise of stakeholders in Europe, jeopardizes the European standardization system.

In case this route will be pursued, CEN and CENELEC strongly urge the EC to define clear horizontal guidelines for those strict and exceptional conditions, including a proper ex-ante impact assessment and the early involvement, consultation, and direct engagement of the industry in line with the conditions 1025/2012 Annex II, 3 (openness, consensus, transparency). when the technical specifications will be used. Furthermore, the EC should define a clear path to transfer the technical specification into the European standardization processes for update and maintenance.

Action → Responding to the call on the ESOs to make proposals by the end of 2022 to **modernise their governance**, CEN and CENELEC have engaged with the Annex III organizations in the Societal Stakeholder Working Group (SSG) and SME-Working Group (SME-WG). Together with the Annex III we are working on 2 project proposals to be submitted to the EC by end 2022 to fully represent the public interest and interests of SMEs, civil society and users and to facilitate access to standards. The projects proposed will cover:

- SME - CEN and CENELEC together with SBS will propose a joint project, with the support of the SME-WG, aiming at further enhancing the inclusiveness of the ESS with awareness-raising activities towards European SMEs (getting involved in standardization: why and how), capacity-building and skill development (implementation and use of standards: what).
- SSG – CEN and CENELEC together with the Societal Annex III organizations (ANEC, ECOS and ETUC) will propose a joint project aiming at defining the key elements for an inclusive system towards Civil Society, looking at the entire standardization process at all levels, and identifying actions to be coordinated at European level.

Pillar 3: Global standards-setting: supporting the EU’s leading position as a forerunner in key technologies and promoting EU core values

At global level, standards are instrumental for technological and industrial competitiveness and consequently we see economic world powers taking a strategic approach to standardization. The CEN-CENELEC Strategy 2030 Goal 5 sets out to strengthen our leadership and ambition at the international level. Using the European standardization system to secure a competitive position for Europe can be achieved through a two-fold approach: by shaping international standards; and using international standards to access global markets and ensuring global competitiveness.

As identified by the strategy, standardization should be taken up as market driven solution by the High-Level Forum, the Industrial Forum, Industry Alliances, Joint Undertakings across all industrial eco-systems. Building on the blueprint of the AI Alliance, we also encourage the creation of dedicated WG on standardization upfront when new Alliances are created.

The proposed **monitoring mechanism** to support European leadership at international level should take into account ongoing projects at CEN and CENELEC level with regards systematic identification and actions on strategic issues in ISO and IEC, and reciprocally identification of European strategic issues to be led at international level by European members.

We note the importance to ensure alignment between different standardization organizations to avoid duplication of work or large overlap of mandates. The Vienna and Frankfurt agreements have been proven to be efficient in jointly developing standards for the single and global market in both regulated and non-regulated areas.

ENs listed in the Official Journal of the EU (i.e. hENs) are given a higher relevance factor at a global level as they enable access to the whole EU market. The effectiveness of listing and procedures for unblocking stalled listing processes would therefore be an active contribution to fostering EU standards at global level.

Trade agreements can refer to standards as an effective tool for market access, provided that there is a reciprocity frame in place with regards to conformity assessment and any other necessary requirements to enter the market. CEN and CENELEC are ready to engage and coordinate upfront with the EC when **trade agreements** are negotiated or implemented, building on the 12 cooperation agreements with regional standardization bodies around the world, which enabled us to have broad experience and understanding of the different standardization models at global level eg SAC – China, ARSO and AFSEC – Africa, JISC – Japan. While identifying the alignment of standards for new topics including emerging technologies is essential, it is also crucial to support stakeholder participation in (international) standardization. The use of a European coordinated support, engaging CEN and CENELEC, to identify and financially support experts who can bring the European dimension into international standardisation work, is encouraged and will imply a significant improvement to current practices.

The EC commits to fund **standardization projects in selected African countries** as part of its development cooperation policy and the Global Gateway. CEN-CENELEC Task Force Africa with the wide participation of European and African stakeholder organizations has developed a Quality Infrastructure (QI) Roadmap for Africa, which defines the frame of an ambitious project to share the European standardization model and its role in strengthening the Single Market with our African partners, in their journey towards the African Union.

Action → CEN and CENELEC propose to work together with the EC on a large scale project to “Increase sustainable intra-African & EU-African trade” development at regional level including adoption of common (ISO and IEC) standards to support the African Continental Free Trade Area (AfCFTA). This project should be part of the DG INPTA Multi-Annual Work Programme for Africa 2023-2027.

Pillar 4: Cutting-edge innovation that fosters timely standards

Standards can serve as a catalyst for innovation and help anchor these outcomes quickly in the market. Every time technology advances, changing standards rather than legislation allows for innovation to thrive. Standards help shorten the cycle between initial concept and market access.

The strategy recognizes the '**standardization booster**' project to support Horizon2020 and Horizon Europe standards output. CEN and CENELEC have invested in reaching out to the research and innovation community and have participated in those European funded research projects which made clear reference to standardization. This best practice should be systematically deployed across all relevant calls for proposals under Horizon Europe, to increase the value of standardization and provide opportunities for researcher and innovators to bring EU funded research work into standardization.

Furthermore it is of utmost importance that the EC, through the HLF, connects policy and research work programmes, to systematically anticipate standardization needs that can boost

the deployment and dissemination of strategic innovations, enabling the green and digital transitions, in the market. In addition, a 2 phase approach is proposed:

- Providing a “sandbox environment” for pilot deployment to enable experimental innovation and e.g. verification of standards in real systems.
- Allow for large scale deployment (“Horizon Industry Scale”), to enable the building of new EU industries and growing existing industries. This second phase could also be connected to identified IPCEI projects (Important Projects of Common European Interest).

Furthermore, we insist that the integration and leadership of Smart Standards in the EU industrial ecosystems will ensure that Europe benefits from the European standardisation system ready to fully capture the value of the Digital Market. The CEN-CENELEC Strategy 2030 Goal 2 accompanies and supports European businesses in their digital transition, embrace the digital agenda and foster fair competition in the single and global market. This will only happen by making available seamless interoperability of protocols and data formats.

To meet these challenges, enabling digital transformation, CEN and CENELEC are deploying three digital transformation projects on the transformation of the process (Online Standards Development); and transformation of the products (Smart Standards and pen Source Solutions).

Pillar 5: Ensuring future standardization expertise – the need for education and skills

CEN and CENELEC and our Members fully share the crucial need for education about standardization in Europe!

This can range from primary and secondary education, to higher level and vocational education. Equally important is the entrepreneurial education within businesses, which should be encouraged to recognize and incentivise those professionals active in standardization ‘bringing standardization to the Board rooms’. This will ensure a motivated next generation of entrepreneurs and professionals that understands and makes the best possible use of standards. This approach has been already implemented by other regions of the world, which use standardization as strategic tool to equip the next generation with powerful standardization skills. This is in contrast with the European long standing history and knowledge of standardization and increased the risk of not exploiting such a unique European asset.

At a time when knowledge is increasingly abundant and innovation eco-systems are opening, it is essential to raise awareness and spread knowledge about standardization as a powerful tool to bring new technologies to market and drive future businesses. Standardization skills should be complementary to management and digital skills for the European industry to compete successfully in the global, innovation-based economy. This stresses the need for initiatives that build continuous relations between academia, industry and standardization and calls for partnership to be built with the e.g. European Institute of Innovation and Technology (*ie EIT ICT Digital*) to provide training courses for young researchers and industry employees.

CEN and CENELEC welcome the proposal by the EC to organize **Standardization University Days** and encourage the EC (DG EAC and DG GROW) and Member States to actively engage CEN and CENELEC and our Members to ensure a successful uptake of this initiative. The valorisation of research and innovation through standardization and pre-normative research can

be reinforced through the CEN-CENELEC Innovation Awards, development of joint trainings with the COST Academy, and strengthening young professional programmes in standardization.

Using the **EU Academy** will be a strong multiplier to reach, attract and train young professionals. In line with the ambition of the HLF, we advise that training courses should provide the views and experiences of industry and market players, credibly demonstrating the effects of standards, cost/benefit and the importance of being involved as early as possible. It's crucial to give that knowledge to graduates from universities and other relevant educational institutions, tomorrow's managers and funders.

Action → There is a clear need to provide for a strong and sustainable pool of experts for European Standardization and attract university and high level education students to standardization. CEN and CENELEC are ready to engage with the EC (DG RTD and DG GROW) to lead a project on the inclusion of standardization knowledge in university/curricula to win students, the professionals of tomorrow, to contribute to standardization.

Contributors to the CEN and CENELEC Action Plan: CEN and CENELEC Boards, the CEN-CENELEC Industry Advisory Forum (IAF), Societal Stakeholder Group (SSG), the SME-Working Group, the European Policy Hub (EPH), the CEN and CENELEC Members.