

## **ECOS contribution to the review of CEN SABE Strategy**

### **Introduction**

During its 9<sup>th</sup> meeting, held in Brussels on 2003-10-07, SABE launched a review of its strategy, and requested its members to contribute by providing proposals. The current SABE strategy is dated 1998, and was endorsed by CEN/BT in document BT N 5375.

ECOS, as CEN Associate, congratulates SABE for launching this review, and would welcome the opportunity to take part in a Working Group that will be discussing the strategy and prepare a draft for discussion at SABE. In the meantime, ECOS is keen to provide a contribution.

In order to be able to help CEN embark on demonstrating its commitment to sustainable development and particularly to environment protection, it is necessary to first consider the recent developments regarding the political context in which CEN evolves. In addition, a thorough analysis of the present CEN activities in environment needs to be made, followed by an assessment of the realisation of the SABE strategy established in 1998. This strategy made 8 proposals, which, provided they are still considered as valid, needs to be complemented now with concrete actions. ECOS proposes some examples of such actions.

### **A. Political framework**

Article 6 of the Treaty establishing the European Community makes it an obligation to integrate environmental protection requirements into the definition and implementation of community policies and activities. Standardisation, as an important component of the European enterprise policy, shall contribute to sustainable development and take into account the environmental dimension.

The 6<sup>th</sup> Environmental Action Program "*Environnement 2010 : Our future, our choice*" calls for the integration of environmental aspects into standardisation, as a way to promote sustainable production and consumption patterns. In a recent draft Communication from the European Commission, this requirement has been re-iterated, underlining the need for European standardisation organisations to make this a reality, promoting particularly the involvement of Environmental NGO.

The European Commission has furthermore just opened a debate on the role of European standardisation in the framework of European legislation and policies. The initial proposal suggests to make a wider use of standardisation as a support to environmental legislation and policy. If accepted, this approach would constitute a political framework for the allocation of further mandates to the European Standards Organisations for producing standards to support European environmental legislation.

If CEN wants to meet the challenge that it is now offered by the European Commission to contribute to an efficient environmental protection and to sustainable development, it needs to take these elements into account, commit itself to really take environmental protection as one of its objective and establish appropriate procedures and structures. It is up to CEN SABE to make concrete proposals on how to fulfil these needs.

## **B. Assessment of the current CEN tools and procedures**

CEN SABE currently is a forum for :

- sharing information regarding environmental legislation and policies, and their impact on standardisation ;
- reporting of activities launched by specific sectors regarding environmental issues in standards ;
- reacting to initiatives taken by the European Commission on a general level.

From the initial proposals made during SABE constitution, it seems that dissemination of information has taken precedence over the elaboration of proposals for a better consideration of environmental issues in European standards.

Although the EHD has not been mentioned as a part of the SABE Strategy in 1998, ECOS is of the opinion that its mission and procedures needs to be reviewed, in order to strengthen its powers and input across the CEN system, particularly towards Technical Committees. The EHD activities could also benefit from more transparent procedures, in which SABE should have a role.

## **C. Proposals**

The distinction between three types of standards (product standards, measurement methods and environmental management tools), as made in the 1998 strategy, remains valid. Taking this classification as a framework to organise SABE activities would help in defining better the objectives to be reached.

Regarding the 8 components of the SABE Strategy of 1998, ECOS would like to make the following proposals to adapt them to the present situation, and add a new proposal :

### *1. Addressing environmental aspects in products standards*

Considering the variety of impacts of products on environment (eg. : through energy consumption, resource use, hazardous substances, waste etc. during all life cycle phases), product standards should constitute a key priority for SABE. SABE should not only promote the introduction of environmental issues into these standards. It should also strive to identify, together with industry "front-runners", possibilities for new standards with strong environmental requirements.

Broadly speaking, ECOS would favour a dynamic situation where categories are envisaged for :

- products with very poor environmental performance and which would be pushed out of the market by legislation ;
- products with high environmental performance, based on a multi-criteria-approach, which would qualify for eco-labels ;
- products with "average-environmental" performance which would be encouraged to

improve their performance by meeting specific requirements set out in European standards.

It would be the task of SABE to ensure that the environmental requirements of CEN standards are sufficiently high to ensure differentiation and continuous improvement. Too low requirements would jeopardise CEN's credibility and ability to really demonstrate a commitment to environmental protection.

## *2. Exchanging information between a large number of stakeholders*

SABE should rationalise its way of communicating information. A regular, formatted and electronic update on European legislative and policy initiatives and standardisation work might help SABE Members to better get a grip on important issues.

Furthermore, SABE should play a role in ensuring information and participation of all key stakeholders at all stages of standardisation. Beyond the participation of ECOS as CEN Associate, SABE should promote more ENGO involvement at national level. National Standardisation Organisations have a key role to play in convincing their partners to create the conditions (including financial support) for an efficient contribution from national ENGOs. SABE could constitute an appropriate co-ordination forum in this respect. An agenda item might be devoted to this issue at each SABE meeting. A review of the participation of ENGOs in national committees and in TC should be initiated by SABE.

## *3. Identifying the areas where European standards can support environmental policies*

ECOS is of the opinion that standardisation should not try to by-pass environmental legislation. The relation between legislation and standardisation must be clearly established. It is only when the legislative requirements have been set that standardisers can really know how standards can usefully contribute to their implementation. Any trial to establish standards without a clear view of the legislative provision will result in a waste of time, delivery of inappropriate standards, and, at the end, damages to CEN's credibility.

SABE should ensure that the respective roles of European environmental policy, legislation and standardisation are clear and understood across the CEN system.

## *4. Receiving well defined mandates in the field of environment*

When mandates are attributed to CEN by the European Commission, SABE should proceed to a systematic review on how environmental requirements are taken into account in the mandate. Experience has shown that lengthy discussions might happen in TC when mandates do not include enough details. The role of SABE could be, before the mandates are discussed by the regulatory committee 98/94, to make sure that environmental requirements are clear enough to allow a quick and efficient drafting of standards.

## *5. Ensuring the coherence between EU initiatives and ISO activities in the field of environment*

ISO activities in the field of environment are mostly dealt with by ISO/TC 207 "Environmental Management". Since Members of CEN are also members of ISO, CEN has accepted to use the provisions of the "Vienna Agreement", which means that European standards are equal to ISO standards in this field, whilst still having to conform with the requirements of European legislation.

Considering that the voice of European members of CEN in ISO is spread over more than 20 delegations, and that the possibility for representatives of ENGOs to take part in ISO is very limited, ECOS suggests that SABE ensures a co-ordination of European views in ISO. This could take the form of meetings of SABE (or a SABE Team) before important ISO/TC 207 meetings, where national positions on ISO drafts and proposals could be, as much as possible, harmonised.

#### *6. Co-ordinating environmental issues amongst TCs*

So far, a SABE team is responsible for co-ordinating activities of Technical Committees that standardise environmental measurement methods. Neither SABE nor a SABE Team have a recognised role in CEN rules, and, therefore, final decisions remain a TC prerogative. The co-ordinating activity of SABE is therefore only useful as long as they are accepted by TC.

The recent creation of a Task Force "Horizontal" has given raise to concerns regarding possible overlaps between this Task Force and the SABE Co-ordination Team. SABE should clarify this issue, and be more involved in the work undertaken following the mandate for horizontal measurement methods.

SABE could support correct interpretation of mandates, help TC in solving blocked situation and ease consensus-building.

In the same way, SABE could be involved in the handling of complaints regarding TCs not following procedures, discriminating certain representative stakeholders, disregarding opinions, not respecting the consensus principle or lacking transparency.

#### *7. Creating and updating the CEN Strategy on environmental issues*

This function of SABE is supported by ECOS, as long as it has a real impact on the work of TC and imposed on them. It is in CEN interest to demonstrate that standards can have a positive impact on environmental protection. The systematic use of existing check lists and guidelines on how to include environmental aspects should be promoted as a part of the CEN rules.

Standards are generally understood as a synonym for "quality" and "safety". It should be an objective for SABE to impose the environmental dimension as a third pillar.

#### *8. Checking the quality of environmental standards (direct standardisation)*

Checking the quality of standards regarding environmental issues has been a task assigned to the CEN Environmental Helpdesk (EHD). SABE should review the mission and procedures of the EHD separately to the discussions about the SABE strategy, in the framework of the actions started in december 2003, and as a result of the answers to the questionnaire circulated to its stakeholders.

#### *9. Environmental Management of CEN*

To demonstrate the commitment of CEN to the integration of environmental aspects (in the spirit of Article 6 of the Treaty) in its policy and products, SABE should encourage CEN to establish an Environmental Management System (EMS) and get registration to it. The scope of this EMS should include the administration of the CEN system (mainly CMC) and the production process of standards.

The most convincing and valuable option would be to get registered according to the EMAS scheme, since this would include the publication of an environmental declaration. However, a certification according to EN ISO 14001 would be already a first step and give CEN the possibility to publish its environmental policy and its relevant environmental aspects.

It could belong to SABE's tasks to make suggestions how to set up such a system and to survey the process.

## **Conclusion**

A methodology for SABE to establish a strategy and follow-up its achievement could be derived from a following matrix. For each category of standard, SABE should propose how to concretely fulfill the needs that it has itself identify.

	Standards for		
	Product	Environmental Management	Measurement Methods
1. Addressing environmental aspects in product standards			
2. Exchanging information between a large number of stakeholders			
3. Identifying the areas where European standards can support environmental policy			
4. Receiving well defined mandates in the field of environment			
5. Ensuring the coherence between EU initiatives and ISO activities in the field of environment			
6. Co-ordinating environmental issues among TCs			
7. Creating and updating CEN strategy on environmental issues			
8. Checking the quality of environmental standards			
9. Establishing an EMS in CEN			