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EUROPEAN PARLIAMENT AND THE EUROPEAN ECONOMIC AND SOCIAL
COMMITTEE**

Integration of Environmental Aspects into European Standardisation

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1. INTRODUCTION

The majority of goods and services around us have now been standardised, although this goes largely unnoticed in most cases. Standards are unseen forces that ensure that things work properly.

In the European standardisation system, standards have developed in areas where the stakeholders concerned have identified and pursued common interests in the definition of technical solutions. A main driver for the development of European standards is their uniform applicability throughout the European Single Market, as they replace national standards. Wherever possible, they are also based on international standards, which facilitate international trade. An extra 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 technical solutions to demonstrate compliance with the law.

Box 1: The European Standardisation System

The European Standards Organisations are CEN¹ (European Committee for Standardisation), CENELEC (European Committee for Electrotechnical Standardisation) and ETSI (European Telecommunication Standardisation Institute). Directive 98/34/EC² recognises these bodies for the development of European standards. It also gives a definition of a European standard. 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 91 of 16.4.2003).

Standards contribute to economic and social development. Because they may define how a product is made, used, maintained and treated at the end of its life, or because they help to sample, test and analyse products or materials in relation to their environmental behaviour or conditions, standards can have a substantial influence on the way products and services impact on the environment. While 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 forums and consortia, or under the umbrella of formal standardisation bodies. The stakeholders involved in these processes have already invested and will continue to invest significant resources in terms of experts' time, technical know-how and meeting expenses. Standards, as voluntary tools, are crucial and it is vital that all the stakeholders involved in their development maximise their potential and thus enhance their role in protecting the environment.

2. AIM AND SCOPE

Sustainable development is a priority for the EU, and it strives to achieve a balance between economic, social and environmental considerations³. European standards often deal with aspects of trade, quality, health and the safety of products, processes

¹ <http://www.cenorm.be>; <http://www.cenelec.org>; <http://www.etsi.org>

² Directive 98/34/EC of the European Parliament and of the Council laying down a procedure for the provision of information in the field of technical standards and regulations

³ COM(2001)264 final. Communication from the Commission – ‘A sustainable Europe for a better world: A European strategy for Sustainable Development’

or services. By additionally considering environmental aspects, European standardisation could make a positive contribution to sustainable development and the relevant implementing policies, such as the Integrated Product Policy (IPP) adopted by the European Commission⁴. There are also a growing number of European standards for test and measurement methods, which contribute to the implementation of environmental policies.

Standardisation stakeholders should take the further steps needed to systematically integrate the relevant environmental aspects into European standards making. Therefore, those conditions needed for European standardisation to make a positive contribution to the protection of the environment merit closer attention.

During the different stages of the development of this document, several consultation exercises took place⁵. A multi-stakeholder meeting was held on the 17th July 2002, a further meeting was held on 16 July 2003. An internet consultation then ran from 25 July to the 15 September 2003. These initiatives were aimed at all stakeholders in the standardisation system and contributions were received from business and industry, NGOs, public authorities and standards organisations themselves. The feedback obtained helped to focus in on the key issues of the subject and assess if a Communication was an appropriate policy instrument to achieve progress.

The results showed that nearly all stakeholders felt that a Communication would be a useful contribution which would help them in their work. Furthermore, a number of common themes emerged which showed a consensus on where progress was most likely to be made. In particular, four key issues were identified, so these are specifically dealt with in this Communication:

- raising awareness and environmental thinking;
- setting priorities;
- enhancing stakeholder participation;
- using tools and offering 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 while still 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, including representatives of small and medium-sized enterprises (SMEs);
- non-governmental organisations (NGOs), and
- scientific organisations.

⁴ COM(2003)302 final. Communication from the Commission to the Council and the European Parliament - Integrated Product Policy - Building on Environmental Life-Cycle Thinking.

⁵ http://www.europa.eu.int/comm/enterprise/standards_policy/environment_standardisation/stakeholder_meeting/2003/consultation_stakeholders.htm

The Commission invites the European Parliament and the Council to endorse the key issues and objectives set out in this Communication.

3. POLICY FRAMEWORK FOR THE INTEGRATION OF ENVIRONMENTAL ASPECTS INTO EUROPEAN STANDARDISATION

3.1 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 environment⁶. It reinforces the principle of the integration of environmental requirements into other policies, recognising that it is one of the keys to sustainable development⁷. 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 policies⁸. Consequently, there has been an increasing focus on the role it can play in protecting the environment and supporting sustainable development.

In many policy documents the Council and the European Parliament have pointed out the wish and need to consider environmental aspects in standardisation⁹. This has been taken up in the aforementioned IPP Communication where standardisation was considered to be a potential tool for reducing the environmental impacts of products and services, from the mining of raw materials to production, distribution, use and waste management. One way that IPP is being put into practice is through the recently adopted proposal¹⁰ for setting Eco-design requirements for 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 the promotion of the integration of environmental protection requirements in standardisation activities in the Sixth Community Environment Action Programme¹¹ adopted by the Council and the European Parliament in 2002.

⁶ Article 2 of the consolidated version of the Treaty establishing the European Community

⁷ Article 6 thereof

⁸ 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

⁹ 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

¹⁰ COM(2003)453 final. Proposal for a Directive of the European Parliament and of the Council On establishing a framework for the setting of Eco-design requirements for Energy-Using Products and amending Council Directive 92/42/EEC

¹¹ 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, 10.9.2002, p. 1 - 15

In the same year, the Commission announced the development of a paper (i.e. this Communication) on standardisation and the protection of the environment¹². The Council welcomed this intention in 2002¹³.

3.2 European standardisation, European legislation: distinct roles

European standards are voluntary documents developed under open and transparent procedures which are managed by the European or international standards organisations. Standardisation work is carried out by and for the relevant stakeholders themselves, on the basis of the consensus principle. This principle also applies to the environmental aspects that are discussed in the process of standards development.

Furthermore, there are areas and aspects where legislation is the best way to ensure that public objectives such as the protection of health, safety or the environment are achieved in a transparent and enforceable manner, involving the institutions invested with democratic legitimacy.

Standardisation and legislation are two different tools, which can offer, in some cases, two options to address environmental issues. They can also be complementary processes as standardisation can support the regulatory approach. Standards can provide solutions to complex technical problems and therefore offer advantages. Stable legal framework conditions can be created if legislation is kept performance-oriented and technical details are dealt with by voluntary standards. This means that a predictable framework for standardisation to deliver the expected results is needed. Nevertheless, in order to maximise the benefits of this complementary relationship, it is essential, when developing legislation, to follow rules for better regulation and to carry out an impact assessment. This kind of impact assessment could also expand on the potential role of standards in relation to the planned legislation. If standards are developed in a way that makes an effective contribution to environmental protection, this will have to be taken into account when developing regulations or when considering de-regulation and appropriate voluntary tools.

3.3 International Dimension

Trade has been a main driver for standardisation since ancient times. From a global perspective, more and more issues require global technical solutions and, in particular, internationally traded goods need international standards whenever possible. The multilateral trading system established under the WTO, and in particular its Agreement on Technical Barriers to Trade (TBT) stipulates 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

¹² COM(2001) 527 final report from the Commission to the Council and European Parliament on actions taken following the resolutions on European Standardisation adopted by the Council and the European Parliament in 1999

¹³ Council Conclusions on standardisation of 1 March 2002, OJ C 66, 15.3.2002

requirements (legitimate objectives) should be defined by legitimate public authorities whilst recognising that technical solutions for the fulfilment of such objectives should preferably be developed by the private stakeholders themselves in 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 meet European needs¹⁴. 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 may be offered to the international standardisation organisations for adoption as international standards. Consequently, European leadership in dealing with the environment, or in integrating environmental aspects into existing standards, can result in relevant international standards.

4. DEVELOPMENTS IN EUROPEAN STANDARDISATION

European standardisation has undergone several developments that have helped to increase its potential to be a useful tool to protect the environment.

4.1 Growing number of European standards

Firstly, the growth in the number of European standards has been considerable. At the time of writing, CEN offers some 7 000 European standards, in a vast range of sectors. In the electro-technical field, there are some 3 300 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 3 200 standardisation documents (ENs and ETSs) to its users. Some 1 200 European Standards (ENs) are published every year by these organisations. In 2003, approximately 13 500 European standards existed.

4.2 Growing range of sectors using European standards

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

¹⁴ SEC (2001) 1296 European policy principles on international standardisation

4.3 Growing take-up in European legislation

In support of the EC's New Approach¹⁵ directives for certain product areas, 2 165 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, such as national enquiry and voting and the representation of stakeholders in the standardisation process. New Approach directives could also be used to develop environmental policies, which has not really been the case so far.

4.4 Standards and the environment

Standards are tools for the dissemination 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.

4.4.1 *Environmental dimension of product standards*

Product standards (i.e. those defining requirements for products) form a major part of the 13 500 European standards that exist today. These standards can set important criteria for products, such as their integral safety and dimensions to help ensure correct interfacing with other components. Waste and incompatibility of components is avoided and the resulting cost benefits can be passed on to consumers. Standards which appropriately take the environmental aspects of a product into account can help to minimise any negative environmental impacts of those products.

Increasingly, product standards which deal with key parts of product life cycles are emerging. Some standardisation documents¹⁶ 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 are a growing number of standards which help to deal with the end-of-life phase of products.

These types of dedicated environmental standards (or guides and reports etc) for products can deal solely with the environmental aspects and/or performance of a product if necessary. Their use might prove increasingly important for the future. They have the benefit of being produced by standardisers with specialized knowledge on environmental issues, thus avoiding prioritising certain environmental aspects to the detriment of others.

4.4.2 *Test methods for environmental purposes*

The implementation of Community directives and regulations sometimes requires the development of standardised test methods, for example, for pollution measurement, pollution control and water analysis. Such standards enable the consistent implementation and enforcement of legislation throughout the European Union.

¹⁵ Council Resolution of 7 May 1985 on a new approach to technical harmonisation and standards (OJ C136 of 04.06.1985) – see <http://europa.eu.int/comm/enterprise/newapproach/legislation/guide/legislation.htm>

¹⁶ e.g. ISO TR 14062: Environmental management - Integrating environmental aspects into product design and development

Without standardised methods of measurement there would be no compatibility/comparability between environmental quality data gathered throughout the EU.

Box 2: Test method for sludges

The Commission has given a mandate to CEN for the development of horizontal standards for sludge, biowaste and soil needed to implement existing and upcoming EU Directives. The aim is to have only a few standards which can be used within the framework of several directives. For example, a horizontal standard to test for potassium content could be used to test potassium levels in sludge or soil or biowaste.

4.4.3 *Environmental technologies*

In the process of creating the action plan for environmental technologies¹⁷ the Commission has found that standards may increase their take-up. The level of performance specified in the standard can have a great impact on the market for environmental technologies.

Energy use, for instance, is an area where European standards are helping to provide environmental benefits. For example, there are European standards projects dealing with the energy efficiency of electrical and gas appliances. In order to 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.

Some standards have environmental benefits which are not immediately obvious. A good example of this is the standard for measuring the mesh sizes of fishing nets¹⁸. 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 potentially contribute to the reduction of traffic and its negative environmental impacts.

Box 3: Combined Heat and Power or Micro-cogeneration

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

4.4.4 *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 within organisations needs to be done in the same systematic way as

¹⁷ These are defined as all technologies whose use is less environmentally harmful than relevant alternatives. COM(2004)38 final. Communication from the Commission. Stimulating Technologies for Sustainable Development: An Environmental Technologies Action Plan for the European Union

¹⁸ EN ISO 16663 Fishing nets – Method of test for the determination of mesh size.

quality assurance, and therefore environmental management system standards, such as EMAS¹⁹ 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 a European standard (EN ISO 14001). Other parts of the ISO 14000 series deal with issues such as life cycle assessment (ISO 14040), environmental performance evaluation (ISO 14030), and environmental labels and declarations (ISO 14020). 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 also goes beyond it. Some of the major differences are that EMAS requires legal compliance, a continuous improvement of environmental performance, an involvement of employees and the publication of an environmental statement (including information about the company and its environmental impacts). Moreover, it is a public system under the control of the Member States

5. KEY ISSUES

5.1 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. Standardisation as a vehicle to implement business activities should be receptive to the need for environmental thinking, even though it is never the standards themselves that have an impact on the environment, but rather the products, processes and services covered by those 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 on the environmental expertise available in the standards development process, and the willingness to take environmental issues *systematically* into account. The aim of this Communication is to promote awareness-raising activities and an exchange of expert knowledge and good practice, so that standards can contribute to a better environment and hence to sustainable development. Efforts at European level will need to be complemented at national level.

5.1.1 Commitment to taking the environment into account

Taking the environment into account must become a commitment for all stakeholders and technical experts involved in the process of creating standards. Raising environmental awareness is often a slow and difficult process because of the sheer

¹⁹ 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>

number of stakeholders involved, as well as the rapid rate of change in environmental know-how. Continuous efforts are needed from all stakeholders, including European and national standards organisations, public authorities, industry and business. In particular, stakeholders representing big business can play a vital role in the production and use of environmental standards due to their relationships with their suppliers and business partners. Also, environmental awareness is an issue they are likely to consider in the context of their corporate social responsibility or their shareholder relations. They should also ensure that any statements they make in favour of the environment or publish in environmental declarations are reflected in the work carried out by their own experts in their standardisation activities. Many organisations, especially NGOs, are already active in raising awareness among their members of the environmental aspects of standardisation. However, this kind of commitment varies enormously across the EU and the acceding countries.

5.1.2 Consideration of possible environmental impacts from the beginning

There is no single or simple answer to the question of how to proceed in order to take the environment into account in European standardisation. The first step, naturally, should be to find out how the standard may impact on the environment. Consideration of the possible environmental impact of standards does not necessarily trigger complicated and time-consuming research or study activity, nor does it mean that a life-cycle assessment needs to be carried out to come to a satisfactory assessment. Obviously, it is better to take the environmental dimension into account from the very first stage than to revise a standard later on. Therefore, what matters is a systematic approach to increase environmental thinking at all stages of the standardisation process, which should then lead to concrete improvements.

Aspects such as 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, measurable and objective issues like the release of hazardous substances, risks to the environment from accidents or misuse, waste, and noise creation should be considered if relevant. Also, standards for measuring eco-efficiency or emissions of pollutants have a crucial role to play in strengthening the environmental dimension of product standards. The results of an early appraisal of environmental impacts of this kind could be useful to standards users. This is why relevant material on which environmental aspects have been considered and at which stage (during the development of a European standard) should be made available in an appropriate format.

5.1.3 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 of environmental innovation, is high, the reviewing of standards on a regular basis is essential. Standards are generally reviewed every five years. The regular review process is an appropriate trigger to start looking into the environmental aspects of already existing standards. During such revision procedures, environmental aspects should be considered systematically, just as at the start of the development of new standards programmes or projects, and made accessible in an appropriate format.

5.1.4 *Training*

Two types of training could potentially facilitate the integration of environmental aspects into the European standardisation process.

Firstly, knowledge about the potential environmental impacts of certain materials, processes or functions needs to be accessible to all technical experts participating in the European standardisation process. Secondly, although the standardisation process is open and transparent, it can be seen as over-complex to an uninitiated audience – even one with sound and appropriate environmental knowledge. Training for such stakeholders could help them to find out how to have their voice heard at national and European level. Access to standardisation-relevant environmental information can be of benefit for all stakeholders and has the potential to strengthen the quality of standards by improving the dissemination of technical know-how. Training on the functioning of the standardisation process can help to promote mutual understanding between stakeholders with different interests.

Future training activities at European and national level should be developed jointly with all the relevant stakeholders and should be based on the experience gained so far.

5.2 **Setting priorities**

Considering the substantial number of ongoing standardisation projects, the high costs of taking part in the standardisation work and the often scarce resources of stakeholders, there is a need for prioritisation. Stakeholders could draw on many different elements to set their priorities, these ranging from stakeholder needs (industry and public) to the implementation of European legislation and policies (for example, those coming from the ratification of international agreements such as the Kyoto Protocol). The 6th Environment Action Programme and the annual Commission's legislative work programme present the main priority issues and can provide tools to anticipate and prioritise standardisation activities and environmental considerations.

5.2.1 *Priority setting by the European Standardisation Organisations: work programmes*

A simple methodology is needed to identify standards programmes or projects which could affect the environment. It would allow 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 programmes and business plans of technical committees and working groups operated by the European Standards Organisations could provide an indication of how their work relates to environmental aspects.

5.2.2 *Priority setting by the Commission: mandates*

One instrument that the Commission can use to flag priorities for European standardisation work is the European standardisation mandate. Mandates are used to initiate European standardisation activities in relation to policy goals, particularly in regard to New Approach directives which can deal with the free circulation of goods and services in the internal market. They can also be issued in areas requiring specific environmental standards or in support of EU environmental policy.

The Commission has been stressing for some years that where mandates are given, it is important to integrate essential issues, such as the protection of safety, health and the environment²⁰. Accordingly, the Commission needs to ensure that standardisation mandates invite a proper consideration of environmental aspects in standards development whilst still respecting other policy areas such as the free circulation of goods in the internal market. In the preparation of a mandate, if appropriate, a preliminary assessment of different environmental, health and safety issues could add value. Finally, the mandate should also set out environmental requirements in such a way as to allow for an assessment on whether the required environmental consideration has been successfully carried out or not.

Specific mandates in support of EU environmental policy are also useful. A specific instrument the Commission uses to invite for the setting of priorities in European standardisation work is the so-called programming mandate. For example, the Commission has issued a programming mandate in support of the future directive on the eco-design of energy-using products.

5.3 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 scientific community should also be involved in order to make sure the standards take latest scientific developments into account. At the political level, the Council has stressed the importance of involving all interested parties by inviting them to participate actively in the development of European standards and to contribute to the management of the standardisation process²¹. Of course, contributions to the programming of European standardisation require a legitimate capacity by representing a constituency nationally and at European level.

Virtually all standards organisations (national and European) have declared their openness to the involvement of new stakeholders in the standardisation process. In practice, however, effective 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.

5.3.1 The national dimension

The participation of environmental stakeholders in standardisation is very important, particularly at national level. The national delegation principle offers stakeholders the possibility of both participating in standardisation activities without extensive travel 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.

²⁰ COM(1998)291 final, p.11. Report from the Commission to the Council and the European Parliament - Efficiency and accountability in European standardisation under the new approach.

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

Some stakeholder groups experience practical difficulties in participating in standardisation. These groups include environmental NGOs, consumer representatives, representatives for occupational health and safety matters, and SMEs. A lack of financial resources and technical expertise may hamper their participation. However, as they constitute a public interest dimension in standard-making and because they can improve the acceptance of standards by their users, their participation should be subject to public support.

Likewise, national public authorities should participate more actively in the standardisation process. A dialogue between the various (national and local) authorities involved may facilitate the integration of environmental aspects with health and safety and economic considerations.

It is also important that the consensus achieved between all the stakeholders at national level is documented and presented as a single, consensual position at European level. Exchanges of experience and best practice between Member States should be organised. They should highlight the representation of environmental interests at national standardisation level, the support granted to the relevant stakeholders and the involvement of national authorities in standardisation. Working on the basis of national activity reports, the Commission, together with the Member States, could then review the progress made.

5.3.2 *The European dimension*

The European standardisation process in CEN and CENELEC is based on national delegations and it is important that the national delegations take forward positions that comprise the views of all stakeholders participating at national level. Since the current participation of environmental stakeholders was deemed as unsatisfactory, the Commission has awarded a service contract²² to ECOS (European Environmental Citizens Organisation for Standardisation), a consortium of environmental organisations. ECOS aims to express environmental interests in the European standardisation process and to ensure that these are considered. At European level, ECOS will have an important role to play by:

- attracting new members among NGOs participating in standardisation at 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 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.

²² ‘Service contract for the integration of environmental requirements in the European standardisation process’ OJ 2002/S 173-137828

ECOS 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 ECOS to play a significant role in the integration of environmental issues into standardisation and intends to support it further in its activities.

The European Commission attaches great importance to the full involvement of all stakeholders in the European standardisation process and has already ensured representation of consumers (ANEC), workers (TUTB) and small and medium-sized enterprises (NORMAPME). These groups have attained associate membership or equivalent status within the European Standardisation Organisations.

6. TOOLS AND INCENTIVES

The 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 are promising and should be encouraged. To enhance the market relevance of standards, it is also important that standards users such as manufacturers, procurers and consumers indicate which environmental aspects they want.

6.1 Existing tools

Working groups dedicated to the environment

Some European standardisation organisations have established special groups for the environment. They tend to function as environment-oriented discussion platforms for experts, where recommendations can be drawn up for strategy development. The CEN Strategic Advisory Board for the Environment (SABE)²³ and the CENELEC Working Group of the Technical Board “Environmental Standardisation” (BTWG 85-3)²⁴ are good examples of this.

The CEN Environmental Helpdesk

CEN has established a service function for environmental issues, the **CEN Environmental Help Desk** (CEN EHD)²⁵, which gives technical advice to standards writers through networks of environmental experts. The CEN EHD is financially supported by the Commission.

Environmental database

An environmental database could be used to enhance transparency and to disseminate information about environmental considerations. The use of databases can help to collect relevant information on potential environmental aspects for materials, products or processes (for example technical information needed to calculate emissions of pollutants or energy consumption). Easy access to such

²³ <http://www.cenorm.be/cenorm/workarea/advisory+bodies/strategic+advisory+board+for+the+environment/index.asp>

²⁴ <http://www.cenelec.org/Cenelec/About+CENELEC/Our+strategy/Environmental+strategy/default.htm>

²⁵ <http://www.cenorm.be/cenorm/workarea/advisory+bodies/environmental+helpdesk/index.asp>

information helps to facilitate the uptake of environmental knowledge and can help to avoid duplication of costs. Of course, such databases take time and resources to create and maintain. In particular, the information they hold needs to be agreed upon and validated.

CENELEC has recently developed an Environmental Database that will pool all environmental aspects dealt with by CENELEC and will help to give access to environmental knowledge.

Guides and checklists

There are also a number of environmental guides and checklists which can help to show how environmental considerations can be integrated into standards. These are either general or specific to individual sectors; the latter are particularly useful because they are written **by** experts from the sector involved **for** experts from the sector involved.

Box 4 : Environmental checklists and guides

CEN Guide 4 - Guide for the inclusion of environmental aspects in product standards

CEN Guidance - Consideration of environmental aspects in standards, includes a matrix checklist to help perform an initial environmental assessment

ISO Guide 64 - Guide for the inclusion of environmental aspects in product standards

IEC Guide 109 - Environmental aspects - Inclusion in electro-technical product standards

IEC Guide 113 - Materials declaration questionnaires - Basic guidelines

ISO TR 14062 - Environmental management - Integrating environmental aspects into product design and development

6.2 Incentives for the systematic application of tools for the integration of environmental aspects

In standardisation, stakeholders give their time and expertise voluntarily. If they are to spend resources on the integration of environmental aspects, they will need the motivation to do so. This Communication therefore provides political acknowledgement of stakeholders' efforts towards more systematic integration of environmental aspects. There are many existing tools which can aid the integration of the environment into European standardisation. The real task ahead is to promote **their systematic use**. The Commission intends to disseminate best practice and to support tools that have already proved their effectiveness in the integration of environmental aspects. It issues an open invitation to stakeholders to present their ideas for incentives and to begin a dialogue on good practices and achieved results. Also, with an increasing number of European standards containing environmental aspects, their use for policy purposes by the Commission is likely to increase.

7. CONCLUSIONS AND THE WAY FORWARD

The Commission intends this Communication to raise awareness for the need to integrate environmental aspects into European standardisation, a voluntary, stakeholder-driven process.

The Commission hereby acknowledges that environmental aspects need to be integrated into European standards. However, it also stresses the importance of

addressing environmental aspects in a balanced and appropriate manner and of properly taking into account the other reasons for which standards are written.

The Commission will now initiate ongoing discussions with stakeholders from the standardisation community in order to develop concrete actions. Indeed, two workshops are planned for 2004 and these will aim to gather ideas and establish projects to achieve progress in the following four areas:

- Awareness for the consideration of environmental aspects in European standardisation needs to be promoted among all stakeholders, in particular in the Acceding Countries. The exchange of expert knowledge and good practice can ensure that environmental aspects in standardisation are identified at an early stage of the development of new standards, or when existing standards are revised every five years. **Training** has been identified as a key issue to ensure that environmental stakeholders can effectively voice their views in the European standardisation process. Equally, the relevant environmental information needs to be gathered and disseminated to all technical experts participating in the process.

For the way forward, the Commission invites ideas and proposals from stakeholders to engage them further in awareness raising and training activities. The Commission is prepared to earmark support for the European standards organisations, if appropriate proposals are presented. Member States are invited to envisage similar activities for the national standards organisations. The situation will be monitored in view of the relevant activities deployed and stakeholders will be invited to exchange experience with a view to identifying good practice.

Because of resource constraints, **priorities** for the work on environmental issues in European standardisation need to be set. Due to the voluntary nature of the process, standardisation stakeholders should remain in control of their work priorities. However, public interest areas and issues relevant to European policy should also be taken into account.

For the way forward, the Commission will consider, where appropriate, environmental aspects in the development of European standardisation mandates as well as specific mandates in support of environmental issues and for standards dedicated to the environmental aspects of products. The Commission will duly consult stakeholders when developing mandates. All stakeholders are invited to develop indicators so that standards that have satisfactorily integrated environmental requirements can be identified.

- The **participation of stakeholders** is crucial for the acceptability and relevance of standards. All stakeholders should be in a position to effectively participate in the development of European standards that are relevant to them. As the European standardisation process is based on national positions, it is important that Member States facilitate the participation of all stakeholders in the formulation of a national position. This then needs to be taken forward on the basis of a consensus at European level. At European level, stakeholder groups who can co-ordinate and develop public interest positions, such as in the environmental field, play an important role in effectively underpinning the national positions.

For the way forward, the Commission invites Member States and Acceding Countries to help all stakeholders, particularly those representing societal concerns and public interests related to environmental matters, including public authorities, to participate in the standardisation process and to formulate consensual positions to be presented at European level as part of the standardisation process. The Commission invites the Member States and the Acceding Countries to regularly report on the different means of support granted. This is expected to promote the exchange of experience and good practice. At European standardisation level, the Commission will continue to offer support for European stakeholder groups that can play a role in the identification and co-ordination of environmental standardisation issues dealt with by the European Standardisation Organisations.

- The **systematic use of tools** for the integration of environmental aspects into standardisation needs to be put into practice. Stakeholders are encouraged to use the tools that have been developed for dealing with environmental considerations in standardisation. Increased use of such tools will enhance experience and it will increase the number of standards with an environmental dimension. This in turn will further increase the attractiveness of European standards for the purposes of policy support and legislation, including in the environmental field.

For the way forward, the Commission invites stakeholders to report on how they have used the different tools they have to hand. Regular meetings to exchange experience and to agree on indicators for assessing progress can help to build up a growing number of European standards with an environmental dimension.

The Commission will continually assess the integration of environmental aspects into European standardisation in the light of progress made in the above four areas. For this purpose, regular stakeholder meetings and workshops will be organised at least once a year.