

The Roadmap of European Standardisation Strategy

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JBCE appreciates the opportunity to share its opinion on the current situation of the European Standardization Strategy. We indeed fully support the joint non-paper of 17 Member States about the context of such need.

The EU-Japan economic partnership agreement (e.g. art. 7.5(1)(b), 7.6, 7.8(2)) emphasizes an active contribution to the development and mutual recognition of technical regulations as well as convergence with international standards and the avoidance of unnecessary technical barriers within regional standards. The principle of “presumption of conformity” is meant to support such mutual recognition of international standards.

Since 2016 we have been noticing some issues with citation of harmonized standards in the EU Official Journal. It seems, citation of harmonized standards which are based on international standards has become almost impossible without deviation. As a result, we would like to highlight the following issues:

- Because the European Commission approval system is not in line with the international voting system for standards, the transparency of the decision-making process and reasoning for rejecting a standard from citation seems to be insufficient.
- The European standardization organization’s members spend so much time identifying potential blocking elements from the European Commission and on solving them, that insufficient time is left for the actual standard development.
- These blocking elements are handled by ESOs, leading to potential technical barriers.
- Most of the cited standards are, unfortunately, several versions behind the current version of the international standards.
- Due to the citation delay, the date of standard withdrawal is no longer identical in the EU Official Journal when compared to the date mentioned in the new standard which instructs the latest national date for withdrawal.

Our main recommendations are:

- Reconsider the current approval process for standard citation, as supported by the EU-Japan economic partnership agreement. Clarify the role of the European Commission in approving the contents of harmonized standards. For instance, we suggest, while assuring the harmonized standard covers the essential requirements, considering avoiding the double-checking of the whole content of an already approved international standard according to the international approval process into which EU Member States represent a large amount of voting weights.
- Prepare an exhaustive list of items for which there is a concern that they may lead to standards blocking and propose solutions within the approval process of the international standardisation office. The investigation of solutions should take a consensus-based approach between the European Commission, the ESOs and stakeholders involved in standardisation activities.



- Review the content of the mandates to potentially frame it within the essential requirement of the directive and the European Commission internal regulations and guides of the ESO. Such mandates should be issued at the earliest stage possible and should consider existing international standards as a basis.
- We encourage the European Commission to actively contribute to European and International standard drafting groups which are part of the work program for citation, with the aim of being part of the consensus-based international decision-making process, to avoid blocking and delays in citation.

About JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of about 90 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles and glass products.

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