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ECOS' comments on the preliminary draft Annual Union Work Programme for Standardisation for 2018

ECOS welcomes the opportunity to comment on the preliminary draft Annual Union Work Programme (AUWP) for Standardisation for 2018.

ECOS sets out its views in the following three sections below:

- ECOS view on the presentation, structure and objectives of the 2018 AUWP
- ECOS view on the proposed initiatives
- ECOS view on future proposals, perceived omissions, and ongoing initiatives.

1. Presentation, structure & objectives of the draft 2018 AUWP

We would like to express our support for the proposed activities in key environmental areas, namely the circular economy, climate change & energy, energy efficiency, and environmental health. We also take the opportunity to highlight gaps and make recommendations to ensure that the European Commission's use of standards will effectively contribute to meeting EU policy and legislative requirements.

ECOS regrets that the lack of transparency of the consultation document, with the preliminary draft providing no strategic outlook, no structure, no context, and no explanation of reasoning for proposals put forward. In contrast to the consultation on the draft preliminary 2017 AUWP, no status update is provided on proposals from the previous AUWP and it is therefore difficult to understand whether initiatives have been discontinued or not.

ECOS would urge the European Commission to provide:

- A structure according to EU policy priorities
- A structure according to ongoing, new and future initiatives
- More detailed comments outlining status, intentions, and anticipated timelines.

We also believe that the AUWP should also include actions that would help achieve the objectives of Regulation (EU) 1025/2012 on European standardisation, especially regarding balanced representation

and effective participation of all stakeholders. Such actions should be subject to a specific section with the same prominence as specific priority areas. They should include reference to the Joint Initiative on Standardisation (JIS), and the long-awaited establishment of an interinstitutional dialogue on standardisation. It should also outline the European Commission's ambitions and plan of action with regards to international standardisation, especially with a view to ensure transparency and inclusiveness in the development of harmonised European standards developed at global level.

2. EC's proposed standardisation developments

ECOS welcomes the EC's proposed standardisation initiatives in key environmental areas, in particular:

Circular Economy

- The proposal to develop a Standardisation Request for the development of harmonised standards for the control of CE-marked fertilising products. However, the proposed timeline for the development of the missing standards will most likely create a situation where standards for organic and organo-mineral fertilisers are not available by the time the future Regulation will enter into force (EC Proposal COM(2016) 157). This will considerably delay the CE marking and free trade of bio-waste based fertilisers throughout Europe (draft AUWP 2018 ref. 37).

Ecodesign

- The EC's proposed standardisation initiatives regarding several Ecodesign product-specific regulations and looks forward to the review of standards with the view to improve them in line with technological and regulatory progress, as well as to make them more consumer-relevant (draft AUWP 2018 ref. 17-25). In 2016, ECOS identified shortcomings in some of the test methods used to measure key environmental parameters of energy-using products regulated under the Ecodesign legislative framework, and stressed the need to better reflect real-life use patterns of products. These shortcomings can lead to product mislabelling, and lower energy savings. We made [recommendations](#) on how to improve test methods in the future and call for the European Commission and the European standardisation organisations to take those into account in future developments.

Environmental Health

- The proposal to develop a standard for the local and regional monitoring of air quality with mobile and portable monitoring devices that meet the data quality objectives in the Ambient Air Quality Directive (2008/50) (draft AUWP 2018 ref. 1);
- The proposal to develop a standard to support the implementation of the Ambient Air Quality Directive (2008/50), including harmonised measurement techniques and common criteria for the number and location of measuring stations assessing ambient air quality (draft AUWP 2018 ref. 2);
- The proposal to develop a standard to support the implementation of the Industrial Emissions Directive (2010/75) and related Best Available Techniques conclusions, including to allow for the suitable monitoring of 1) the emissions of ammonia (NH₃) to the air, and of 2) hydrogen fluoride or total gaseous fluoride emissions to the air (draft AUWP 2018 ref. 3 & 5)

- The proposal to develop a harmonised standard on Polycyclic Aromatic Hydrocarbons (PAHs) and we call for the swift finalisation of the related Standardisation Request currently under preparation (draft AUWP 2018 ref. 41);
- Although not directly linked to ECOS' 2017 work programme, the EC's willingness to revise M/136 on materials in contact with water for human consumption, a Standardisation Request which has been under discussion for more than 10 years (draft AUWP 2018 ref. 33 & 43).

Climate change & clean energy

- The development of energy performance standards for district heating and cooling, in support of the EU Renewable Energy Directive 2009/28/EC and the Commission's legislative proposal COM (2016)767 on the recast of the EU Renewable Energy Directive (draft AUWP 2018 ref. 26);
- The continued implementation of M/526 on revising standards to improve the resilience of key EU infrastructure in the face of the inevitable impacts of climate change. However, some CEN-CENELEC Technical Committees have been relatively unresponsive to the recommendations to review some of their standards to include climate adaptation considerations. Further guidance from the EC or the standardisation organisations on how to most effectively implement the requirements of the mandate would be welcomed (draft AUWP 2018 ref. 48);
- The intention to examine how technical standards can increase the development of Green Infrastructure, contributing to improved resource efficiency in the building sector and better resilience to the impacts of climate change (draft AUWP 2018 ref. 28 & 30).

3. EC's future proposals, perceived omissions, and ongoing initiatives

We support on-going initiatives and look forward to future developments in other environmental key areas, and we regret that some haven't already been included in the 2018 AUWP. We urge the European Commission to take into account the below recommendations. In particular, ECOS supports:

Circular Economy

- The issuing and final adoption of an EC Standardisation Request to develop a standard for the home composting of lightweight plastic carrier bags in the context of the Directive on lightweight plastic carrier bags ([Directive \(EU\) 2015/720](#));
- The next steps within the CEN ancillary action on sustainable chemicals from primary and secondary raw materials, as requested by the EC;
- The development of a Standardisation Request on water reuse to support the circular economy, including setting minimum quality standards for treated wastewater, especially in urban areas;
- The development of a European standard on the recyclability/quality of recycled content for plastics and plastics packaging;
- The development of a European standard on the sustainable sourcing and optimal end-of-life options for bioplastics.

Ecodesign

- We look forward to any other Standardisation Requests depending on regulatory needs and as the Ecodesign [Working Plan](#) 2016-2019 progresses.

Environmental Health

- Progress in the development and validation of a standard method for determining total gaseous mercury using sorbent traps for periodic and long term measurements in the context of the Industrial Emissions Directive.
- Progress in the development of standard for formaldehyde emissions monitoring measurements in the context of the Industrial Emissions Directive.
- Progress in the development of validated standards on the use of modelling techniques to assess air quality to ensure comparability of models used, and a harmonised methodology for source identification and quantification, to support the Ambient Air Quality Directive.

Climate change & clean energy

- The issuing of the F-Gas Standardisation Request, which was developed based on the results of the scoping study undertaken by EC Directorate General CLIMA to understand obstacles in standards to HFC-alternative refrigerants. The Standardisation Request has suffered delays due to the '[James Elliot](#)' European Court of Justice Judgement, and we encourage the swift completion of the inter-service consultation so that standardisation activities can begin;
- Progress in the next steps to respond to the Standardisation Request M/547 on algae and algae-based products or intermediates in support of the implementation of the Renewable Energy Directive (2009/28);
- The development of standards on interoperability between power grids, on safe admixture of hydrogen to the natural gas grid, on gas quality and on compatibility with end-use appliances is not present in the 2018 AUWP. An explanation for the absence of the initiative is needed;
- The development of a European standard on EMAS (EU Eco-Management and Audit Scheme) to support provisions of ISO 14005 'Environmental management systems -- Guidelines for the phased implementation of an environmental management system, including the use of environmental performance evaluation', in the context of this standard's ongoing revision.



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