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ECOS comments on the preliminary draft Annual Union Work Programme for Standardisation for 2020

ECOS welcomes the opportunity to comment on the preliminary draft Annual Union Work Programme (AUWP) for Standardisation for 2020.

This paper outlines ECOS' views on:

1. the presentation, structure and objectives of the 2020 AUWP;
2. the proposed initiatives, future proposals, perceived omissions, and ongoing initiatives.

We support the overall coverage of proposed activities in key environmental areas, namely climate change & energy and the circular economy. 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 in areas of public interest.

1. Need for greater clarity on key objectives and actions

This year again, we consider there is a lack of clarity 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 again provided on proposals from the previous AUWP making it difficult to understand whether initiatives have been discontinued or not.

Similar to comments to previous preliminary drafts ECOS urges 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.

It is our view that the AUWP should include specific actions that would help achieve the objectives of Regulation (EU) 1025/2012, especially regarding appropriate representation and effective participation of underrepresented stakeholders including environmental NGOs. Such actions should be included in a specific section of same prominence as specific priority areas. 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 international standards which then become harmonised in Europe.

2. Improving the proposed standardisation developments in key environmental areas

In this section ECOS views are outlined on ways to improve or strengthen the EC's 2020 Annual Union Work Programme for Standardisation. While we support many of the on-going initiatives and look forward to future developments in other environmental areas, we regret that some key areas have not been included in the preliminary draft.

2.1. Circular Economy

Plastics

ECOS supports the proposed standardisation of methods to characterise **recycled plastics** as well as the development of differentiated quality criteria for different types of sorted plastic waste. Such methods will help the uptake of recycled plastic content in new plastic products and drive more circular practices in the plastics value chain. However, the specific quality and chemical composition requirements for recyclates should first be defined in product-specific legislation with regards to their suitability for food contact or other necessary safety parameters.

ECOS recognizes there is currently a strong interest in **chemical recycling** from industry and policy-makers but the expectations with regards to the standardisation of aspects relating to this rather new, low Technological Readiness Level type of recycling should be further clarified. Furthermore, it seems that current Life Cycle Assessment standards can already provide for the necessary system boundaries to calculate inputs and outputs of such a process. It is therefore unclear which contribution is expected from the development of new standards in this field.

ECOS strongly urges the European Commission to preferably rectify, or a minimum explain the absence of any reference or mention of the standardisation requests to be developed in support of the **Single Use Plastics directive**, and more specifically the design requirement relating to tethered caps for beverage containers, as well as the development of a standard for the recyclability of fishing gear.

ECOS wishes to highlight that specific standards may also be required to support the European Commission's agenda on **microplastics**. Methods for the sampling, quantitative assessment, as well as the qualitative analysis of microplastics found in the environment are a necessary prerequisite to set adequate limits in policies and regulation.

Furthermore, standards can also help address secondary microplastics from products such as tyres and synthetic clothing. ECOS calls on the European Commission to include test methods for the measurement of tyre abrasion and mileage (durability) into its AUWP because such methods are the necessary first step to enable a possible inclusion of abrasion and mileage as parameters into the tyre label, as per the EC proposal.

Similarly, a harmonised standard for the measurement of fibre wear-off during a washing cycle would also be a useful tool to help limit unintentionally released microplastics from washing.

Waste and raw materials

A study (i.e. ancillary action) on the need for, and the development of, European standards for the treatment of waste and (quality of) secondary raw materials will be more effective if the scope is clearly defined. The market for secondary metals is already quite established and the biggest challenges lie in the areas of plastics recycling and organic residues/by-products. However, if the focus is on CRMs, excluding WEEE, batteries and plastics, the scope will be quite limited.

Furthermore, it is essential to first define clear EU-wide End-of-Waste criteria and use standards as a complementary instrument. Most importantly, to ensure the quality of secondary raw materials, waste management practises have to be improved and harmonised throughout Europe, based on state-of-the-art collection at source and through circular take-back schemes.

Recycling waste of electrical and electronic equipment

Two separate standardisation requests should be proposed: one dealing with material-efficient recycling and CRM recovery of WEEE, and another on waste batteries. For the first category (material-efficient recycling of WEEE) the EC could consider revising the existing set of standards on collection and treatment of WEEE and adding requirements on CRM recovery in line with the recommendations of SCRREEN and CEWASTE. The current EN 50625 series on WEEE recycling need to be revised in order to reduce the administrative burden, become more accessible for small-scale operators and stimulate preparation for reuse. In addition, new standards need to be developed for the end-processing and refining, with the aim to recover CRMs from WEEE and batteries in a sustainable way.

Although CRM recovery is technically feasible for a number of products/components¹, the business case is still negative for many CRMs. Standardisation is therefore not a panacea, but needs to be complemented by other policy measures and financial incentives (e.g. through EPR) in order to push the market forward.

Fertilisers

The proposal to develop a Standardisation Request for the development of harmonised standards for the control of CE-marked fertilising products was already part of the 2018 and 2019 AUWP. For the past two years, ECOS highlighted to the Commission the fact that the proposed timeline for the development of the missing standards would create a situation where standards for organic and organo-mineral fertilisers would not be available by the time the text amending Regulation (EC) 2003/2003 enters into force. This would in turn have considerably delayed the CE marking and free trade of bio-waste-based fertilisers throughout Europe.

Content-wise, the standardization request should address the issue of measuring Hexavalent chromium in organic fertilisers and in case such measure could not be accurate, open the possibility to measure total chromium content instead.

Batteries

ECOS is expecting a standardisation request on material-efficient recycling of batteries. There are currently no standards in this field, which is a major gap considering the *EU Strategic Action Plan for Batteries* and increasing use of batteries for mobility (bikes, scooters and vehicles) and energy storage.

¹ CRT monitors and TVs, flat panel displays, fluorescent lamps, large household appliances, mobile phones, laptops, tablets, desktop computers and PV panels – the main CRM components being magnets, printed circuit boards, fluorescent powders and batteries.

In parallel, the legislative framework needs to be improved to enable preparation for reuse and recycling of Lithium-ion and NiMH batteries.

Other Circular Economy-related SRs that need to be included in the AUWP

Other areas where Standardisation Requests should be explored include: water reuse, natural capital accounting, sustainable finance and transversal action on circular economy.

2.2. Ecodesign and Energy Labelling

Due to its coverage of a wide range of product categories and product-specific regulations, Ecodesign and Energy Labelling constitute an area which is supported by several standards and therefore Standardisation Requests. In order to serve the purpose of providing state-of-the-art methodologies and reflecting market and technological progress in such products, new SRs need to be considered each time new regulatory proposals are being made either for products newly regulated or for those that regulations are being revised. Such Standardisation Requests must also be aligned with recent key regulatory provisions, and, while respecting product specificities, still maintain a level of consistency amongst each other. Specifically, in order to implement provisions provided in the framework Energy Labelling regulation 2017/1369 as well as in the newly-published Ecodesign regulations in 2018 and 2019, SRs must:

- request standards containing methodologies which represent as far as possible real-life conditions of product use and consumer behavior.
- request standards that will consider ways to address circumvention
- request standards to support regulatory provisions related to material efficiency, such as durability, reparability, recyclability and others.

Additionally, comments on Ecodesign-related SRs on specific products are provided below:

Standardisation requests related to Ecodesign and Energy Labelling Regulations – motors

ECOS welcomes the inclusion of the SR for motors in the work programme and would like to see it specifically address the above mentioned general principles of representativeness, anti-circumvention and material efficiency.

Standardisation requests related to Ecodesign and Energy Labelling Regulations – water heaters

ECOS would welcome an SR related to water heaters for Ecodesign, which, in line with regulatory developments, would request methods that are representative of real-life conditions of product use, cover material efficiency aspects and address circumvention.

Standardisation requests related to Ecodesign and Energy Labelling Regulations – dishwashers

Concerning dishwashers, beyond the main principles ECOS wants for Ecodesign such as material efficiency aspects, circumvention and real-life representativeness in line with the latest regulatory developments, the SR should address specific parameters such as water consumption and low power modes to ensure that the next revision of the standard includes robust procedures to measure them.

Standardisation requests related to Ecodesign and Energy Labelling Regulations – washing machines and washer-dryers

SRs developed for these product categories should be in line with regulatory developments, and also ensure that methods requested abide by the principles of representativeness, anti-circumvention and material efficiency.

Standardisation requests related to Ecodesign and Energy Labelling Regulations – batteries

We welcome the inclusion and foreseen publication of an SR related to batteries within the framework of Ecodesign. Standards under this SR should cover a number of parameters including:

- energy efficiency and performance
- durability
- determination of the state of charge and state of health
- safe dismantling
- reporting on environmental footprint

Other Ecodesign SRs that need to be include in the AUWP

ECOS urges the European Commission to propose Standardisation Requests in the following Ecodesign-related areas:

- Vacuum cleaners: in relation to the decision of annulment of the Energy Labelling Regulation for vacuum cleaners, ECOS calls for an SR to develop a more representative measurement method for the performance of vacuum cleaners involving a partly-loaded instead of an empty receptacle.
- Tumble dryers: considering the imminent revision of the regulation, a new SR is needed for the standard to be in line with the latest policy developments which will most likely include aspects on material efficiency, circumvention and real-life user behavior.
- Photovoltaic panels: The need for a specific standardisation request related to photovoltaic panels should be considered on the basis of the outcome of the preparatory study for these products. Particular focus should be given to material efficiency, and in particular durability, as this aspect stands out from the Ecodesign preparatory study.
- Computers: in line with recent regulatory developments and discussions towards standards and methods that are more representative of real-life conditions of use and user behaviour, an SR is necessary to request a method for measuring the energy performance of computers in **active mode**.
- Taps and Showerheads: given the lack of a common measurement method in Europe, ECOS calls for an SR to include test methods for the water flow and other energy-related parameters that would facilitate the ongoing regulatory discussions.
- Non-household washing machines and dishwashers: the blockage on the regulatory developments for these products since 2014 is based mainly on the lack of common measurement methods. Also, the SR issued in 2015 was rejected by CENELEC. ECOS insists on the urgency for a SR to develop measurement methods for energy and water performance.
- Industrial products: recent developments in product regulations such as power transformers have revealed the need for improved and adapted verification procedures for large and complex products. ECOS would call the Commission to issue SRs to support situations in which testing for compliance verification may occur in-situ or at the manufacturer's premises.

2.3. Climate change & clean energy

Reduction of GHG

It is not clear how Recital 25 of Regulation 2018/2066 relates to standardisation and what are the standards that would be covered by the revision listed in this AUWP.

Industrial Emissions and Air Quality

Regarding industrial emissions, we fully agree with the European Commission that standard methods should be updated to measure low level values for various pollutants in accordance with the BAT Conclusions.

Regarding mercury, for instance, ECOS has been pushing for the re-validation of EN 13211 for several years. This European standard is meant to provide a method for the determination of the mass concentration of mercury in exhaust gases from ducts and chimneys and is associated with the Air Quality Directive. In this context, the European Commission should ensure a new validation of EN 13211 to document low uncertainty for setting low emission limit values under the EU Mercury Strategy and the Minamata Convention is carried out.

Having said that, regarding both industrial emissions as well as ambient air quality, ECOS regrets that the revision of measurement methods was put on hold for years, at the expense of the environment. ECOS urges the European Commission to ensure the revision of outdated EN standards to take into account the best measurement techniques and/or set aside funds to ensure their robustness through testing (e.g. for PMs, modelling quality objectives, low cost sensors, etc.).

Construction products

ECOS fully agrees there is a need for standards in support of the Construction Products Regulation to provide the common technical language required for the appropriate functioning of the harmonisation system. However, we believe that there is a real gap in construction product standards supporting environmental objectives such as lower Greenhouse Gas emissions or design for re-use and recycling. Furthermore, future standardisation requests in the field should clearly adopt the performance-based approach of the CPR and avoid prescriptive requirements relating to product composition.

Hydrogen

While welcoming the interest in such an important topic for alternative fuels, we regret that no update or no further detail is given to this priority item. 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 was originally present in 2017 AUWP. Regretfully, no update on the standardisation initiatives is given.

Transport infrastructure

We strongly support the pre-normative actions regarding the ISO/IEC 15118 standard, which is currently under revision at international level. Limits and weaknesses of this standard shall be analysed and duly taken into consideration in the revision of Directive 2014/94/EU on the Deployment of Alternative Fuels Infrastructure and in the European transposition of the standard.

As far as big infrastructure projects, such as bridges, are concerned, ECOS strongly recommends to ensure that standardisation requests include aspects related to adaptation to climate change. Indeed, such big infrastructure projects have an important lifetime and should be designed, built and maintained according to future climate data and updated extreme weather events scenarios.

Road vehicles (vehicle to grid)

We welcome the interest in developing a harmonised system of electronic invoicing for grid balancing services, i.e. vehicle-to-grid, provided that this effort ensures clarity and transparency for consumers.

High and low voltage direct current

Harmonisation and standardisation of high and low voltage distribution levels aiming at a higher penetration of renewable energy sources is welcome. However, risks related to ancillary services, i.e. cybersecurity, should be taken into account and validated against Network Codes.

Green infrastructure in wider environmental and climate context

We welcome initiatives around green infrastructures, such as that proposed on pollinator-friendly cities. ECOS believes that green infrastructures can typically fulfill several environmental functions such as biodiversity (as highlighted in this AUWP), but also water retention, carbon sequestration, reduction of vulnerability to natural disaster risks; not to mention their social benefits. Standardisation requests addressing green infrastructure of any kind should foster this multifunctionality aspect.

Sustainable finance

Finally, although not taking place under the initiative of the European Commission and being developed within various ISO committees, we reiterate our recommendation on the 2019 AUWP: the European Commission should make sure that the work of ISO on sustainable finance (standards on green bonds including a taxonomy for green activities, climate finance, green projects) is aligned with the European Union's sustainable finance legislation. The contrary would simply put additional barriers for external investors to make greener choices.