Access granted?

Best practices for including NGOs in the work of National Standardisation Bodies





About ECOS

ECOS - Environmental Coalition on Standards is an international NGO with a network of members and experts advocating for environmentally friendly technical standards, policies and laws. We ensure the environmental voice is heard when they are developed and drive change by providing expertise to policymakers and industry players, leading to the implementation of strong environmental principles.

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Contents

Informed, activated, engaged! Why this toolkit?	4
How to use this toolkit	5
Recommendations for National Standardisation Bodies	6
Recommendations for national governments	9
Recommendations for environmental NGOs	11
Best practices from ECOS membership	12
Notes and references	21

Informed, activated, engaged! Why this toolkit?

Standards can have a direct impact on our environment. They underpin the implementation of environmental policies and laws, and can help the green transition - as long as they are environmentally ambitious.

It is vital to involve a wide range of stakeholders, particularly environmental organisations, in standardisation processes. Only this way can we make sure that standards properly take environmental interests into account. Environmental NGOs can add significantly to the process by providing environmental values, scientific perspectives, and technical expertise that may otherwise be unavailable to – or even overlooked by! - standards makers.

Despite the different existing strategies to promote the engagement of environmental stakeholders in standardisation, effective participation of civil society, including environmental actors, remains too low.

The will seems to be there: at the international level, the 2021 London Declaration commits members of international standardisers ISO and IEC to improve the involvement of civil society in standards making. As signatories of the Declaration, the same applies to members of their European counterparts, CEN and CENELEC. At the same time, in the EU, the Regulation 1025/2012 and the European Standardisation Strategy also call for a more inclusive standardisation system, with a focus on the role of SMEs and civil society organisations. The World Trade Organization's Technical Barriers to Trade Six Principles for the Development of International Standards, Guides and Recommendations include openness and transparency.

And where there is a will, there is a way? Not always. Environmental organisations still face a wide range of challenges preventing them from effectively participating in standardisation, especially at national level. Given the power wielded by national delegations both in EU and international standards making, the inclusion of environmental NGOs at national level is absolutely paramount – they can influence standards at all levels, starting from their home country and reaching all the way to the international arena.

Inclusiveness at national level is key to unlock an inclusive, transparent, and open decision-making in standardisation. This is why measures have been taken in different countries to ensure the environmental voice is represented in the development of standards. However, these measures are still few, and the lack of resources and the limited understanding and access to information on standardisation are among the biggest obstacles faced by environmental actors. These can only be addressed by more proactive initiatives from both national governments and National Standardisation Bodies¹ to support the effective participation of environmental NGOs.

Our toolkit aims to explore how this can be done as it gathers best practices from environmental NGOs involved in standardisation at national level, and puts forward a number of recommendations for National Standardisation Bodies (NSBs), national governments and environmental NGOs themselves.

Our case studies are based on feedback from ECOS members – but the toolkit will be updated as we discover new cases.

Would you like to contribute with good practices? Reach out to us!

How to use this toolkit

Our toolkit draws from the experience of ECOS member organisations involved in the national standardisation processes. Each country page focuses on the three main challenges to effective participation at national level: inclusiveness, expertise, and financing.



National Standardisation Bodies

5

National

governments

Environmental

NGOs

Recommendations for National Standardisation Bodies

National Standardisation Bodies (NSBs) play a crucial role in facilitating the effective participation of environmental organisations in national standardisation. To make this happen, NSBs can put in place different measures. Our recommendations for NSBs, listed below, stem from our own experience, which spans more than two decades, but also from the recommendations put forward by the European Commission's High-Level Forum Work Stream 3², where ECOS has been very active, and which focuses on enhancing inclusiveness and effective participation of stakeholders in standardisation at the national level.

1

Raise awareness of national environmental NGOs on the importance of standards for the environment and the possibilities to participate in the process of developing them To help address knowledge and awareness gaps regarding standardisation, we recommend NSBs develop targeted guidelines, training, and capacity-building activities for environmental organisations and their experts. This would be complementary to ECOS actions on outreach and engagement of national environmental civil society actors in standardisation. A particular focus should be put on enhancing the understanding of the importance of standards in support of the environmental policies and national environmental ambitions, and how standardisation works at the national level. This can be done through meetings with key environmental organisations, joining events organised by environmental NGOs, or setting up info sessions for environmental actors to address their questions. This more active approach to information dissemination can help to attract more environmental actors and motivate them to become involved in standardisation work.

2

Provide favourable entry conditions for environmental organisations and their experts to participate in technical committees/ working groups Despite varying financing models, NSBs should encourage and facilitate the participation of societal stakeholders: environmental organisations should be able to participate regardless of financial capacity. Access to national (mirror) committees should be free like in Greece and Portugal, or offered at reduced rates to foster the engagement of environmental organisations. For NSBs that charge fees for each committee, costreduction mechanisms, such as capping fees or offering discounts for multiple committee memberships, should be implemented to support broader participation.

3 Dedicate resources to address inclusiveness

NSBs should review their membership requirements and assess how balanced and diverse the composition of national mirror committees is. Based on this assessment, NSBs should dedicate specific budgets to actions on national inclusiveness.

4

Establish a focal point for environmental NGOs

A significant issue is the absence of clear and proactive contact points within NSBs for societal stakeholders, and more specifically, environmental organisations. As a result, many NGOs do not know who to contact for information. It is recommended that each NSB appoints at least one contact person to improve communication with environmental organisations and support them, thereby enhancing their effective participation in the standardisation process.

5

Involve environmental organisations in NSB governing structures Establishing dedicated societal stakeholder groups would provide a formal platform for these underrepresented parties to discuss and address standardisation issues, fostering inclusiveness in the decisionmaking process. Providing environmental NGOs a specific seat within NSB governing structures (e.g. the Advisory Board) will enable them to support NSBs in addressing environmental standardisation issues, and work towards achieving national environmental objectives.

6

Ensure online access to technical committee and working group meetings Providing environmental NGO experts with the option to join technical committee meetings online increases accessibility. ECOS members in Greece and Portugal mentioned the online meeting format allows them to participate in the meetings more easily, regardless of location, ability to travel, and time constraints, while reducing their environmental footprints.

7

Provide easy online access to relevant documents for environmental NGOs, and other underrepresented stakeholders Openly sharing the NSB's annual work programme makes it easier for environmental NGOs to identify standardisation projects relevant to their work. Tailored monitoring tools would allow underrepresented stakeholders to easily find what they are looking for. NSBs should also give environmental NGOs and underrepresented stakeholders free access to all the documentation shared within mirror committees (draft standards) as well as to referenced standards (normative references), for them to be able to adequately undertake the work. Another measure that would make it easier for underrepresented stakeholders to participate is the translation of basic documents. 8

Ensure an effective and inclusive approval procedure at national level NSBs should make draft standards systematically available in full, and easily accessible during the enquiry stage, through a well-publicised and regularly updated online platform for comments. The existing online portals are often not well-known, and draft standards are not always accessible. It would greatly improve things if the portals were more visible, with clear communication on procedures, and enough time for environmental NGOs to prepare and submit comments, and actively engage in this process. This would ensure that the expertise of environmental NGOs can effectively feed into the national positions.

9

Provide specific rights to underrepresented stakeholders For example, in Germany, three categories of societal stakeholders (occupational safety and health, consumer protection, and environmental protection) hold a block vote, giving them a right of appeal during the standard development process. In this case, the block vote rights strengthen the voice of societal stakeholders and address the imbalance of power in committees.

Still lost? Reach out to ECOS!

We would be happy to discuss how you can improve the inclusion of environmental NGOs in standardisation in your country.

Recommendations for national governments

The biggest hurdle for environmental NGOs wishing to engage in standardisation is the lack of sustainable financial resources for this work. Here, national governments can play a key role in the inclusion of ENGOs, at the same time ensuring that national environmental ambitions are well considered in the standardisation work. As in the previous section, our recommendations for national governments take into account the results of the European Commission's High-Level Forum Work Stream 3, which focuses on enhancing inclusiveness and effective participation of stakeholders in standardisation at the national level.

1

Provide sustainable financial support to environmental NGOs While some environmental organisations are able to include standardisation activities in their project work, short-term project funding does not allow for meaningful participation since it is not aligned with the average timeframe of standard development. It is only with stable funding sources, fully allocated to standardisation work, that environmental NGOs can actively contribute to standardisation processes - like the case of Germany. Another possibility is providing societal stakeholders with funding to cover the participation costs to join standardisation meetings, such as participation fees, travelling costs, and allowances, as is the case in Sweden.

2

Establish a dedicated contact person and/or office for standardisation Such a contact point within the relevant ministry dedicated to standardisation would facilitate and streamline communication. Environmental organisations would know who to reach out to with their feedback and valuable insights that would, in turn, allow governments to make informed adjustments to their standardisation policies. This continuous feedback loop could lead to improvements and better alignment between national ambitions and the needs of environmental NGOs which engage (or want to engage) in standardisation. National governments should also create an online resource access point (e.g. a website) to gather all relevant information concerning standardisation in their country, as already done in Germany or Sweden.



Promote awareness-raising and education initiatives on standardisation at universities, as well as lifelong learning Government authorities should promote the awareness of standards and their role, as well as integrate standardisation-related knowledge and courses into existing curricula for universities and lifelong learning. Future employees of all possible stakeholders, including environmental NGOs, need to become more aware of standardisation, including why and how they can get involved in those processes.

Still lost? Reach out to ECOS!

We would be happy to discuss how you can improve the inclusion of environmental NGOs in standardisation in your country.

Recommendations for environmental NGOs

Depending on the internal capacity and existing external support, environmental NGOs can follow different paths to standardisation in their own country. They can use the decision tree below as a signpost in their journey.



Best practices from ECOS membership



ECOS member	National entity representing environmental interests	National Standardisation Body
Bund Für Umwelt und Naturschutz	Koordinierungsbüro Normungsarbeit	German Institute for Standardisation
Deutschland e.V. (BUND)	der Umweltverbände (KNU)	e.V. (DIN)

Prominent German environmental organisations negotiated with the Federal Ministry for the Environment to strengthen the voice of environmental protection in the standardisation process. As result, KNU was established in 1996 as the self-organised "National representation of interests for environmental organisations in the standardisation process". In terms of legal and organisational integration, the decision was made to locate it at BUND .e.V.

Best practices

Environmental organisation

KNU is the umbrella for German environmental NGOs, who want to get actively involved in technical standardisation committees at national, European and international level. It does so by:

- Work together with experts from German environmental organisations, whether they are volunteers or permanent staff.
- Provide financial support for the expert work (travel expenses, remuneration, DIN participation fee).
- Publish position papers.
- Organise technical discussions on standardisation projects.
- Provide support to the experts in case of conflict with the standardisation organisations.
- Provide capacity-building on standardisation.
- Advocate for better framework conditions for the participation of eNGO experts at DIN.

National Standardisation Body

- Have an Environmental Protection Helpdesk where environmental organisations can find out more about standardisation activities that are relevant to them. The EPH-Office receives financial support from the Federal Ministry for the Environment.
- Grant a block vote to societal stakeholders defending public interests.
- Host a draft standard portal. After registering, interested citizens and experts can, free of charge, comment on draft standards during the Public Enquiry process.

National government

- Sustainable funding from the German Federal government to allow environmental organisations to participate in standardisation and to support DIN bodies in taking environmental issues into account in their standards work.
- Technical support from the Federal Environment Agency to both KNU and DIN-EHD.
- Sit on relevant steering committees at DIN.

Empowering to engage



Koordinierungsbüro Normungsarbeit der Umweltverbände (KNU) has worked since 1996 to ensure that the environmental voice is heard in the standardisation process. German eNGOs pushed for this because governments in Germany and other EU states are referring more and more to standards in their laws and regulations.

KNU has continuously received financial funding from the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety, and Consumer Protection (BMUV) KNU is tasked with representing environmental interests and coordinating the participation of German environmental NGOs and their experts in the standards development.

German environmental NGOs can choose to contribute to the work of KNU by flagging their experts and which standards they are interested in. Considering the available budget and the relevance of the proposed standards, KNU can allocate resources to cover their related costs.

In 2011, the DIN Presidial Board instituted a block vote to serve solely to assure the three public interests of occupational safety and health, as well as consumer and environmental protection. A block vote for environmental protection must be carried jointly by KNU, the Federal Ministry of Environment and the Federal Environmental Agency.

Environmental experts hold three seats on DIN-EPH Advisory Board.

The **DIN-Environmental Protection Helpdesk** (**DIN-EPH**) was set up by the Federal government to support DIN in taking into account environmental issues in their standards work. DIN-EPH also holds a seat on KNU's Advisory Board³.

With changes expected in DIN's financial model in 2025, KNU has been advocating for better entry conditions for environmental NGOs, including the removal of participation fees for environmental NGOs. Unfortunately, to no avail. DIN's governance model has also been reviewed; the impact of these changes remains unclear.



KNU works with engaged experts to participate directly in technical committees and working groups. Via KNU there are currently 21 experts from 10 environmental NGOs working in about 50 technical committees and working groups at national, European, and international levels⁴.

Since 2002, KNU has closely cooperated with ECOS, including intensive strategic exchange and joint publications.

Experts delegated by KNU and ECOS to European and international committees collaborate and strengthen each other's arguments. Unlike ECOS experts, KNU experts have the right to vote in the committees due to the standardisation regulations.



KNU has benefited from stable funding provided by the German Federal Ministry of Environment (BMUV). The financial resources cover KNU's operation cost and other standard-related activities such as expert fees, travelling cost, DIN participation fees, training and professional exchange among KNU's experts, translation work, etc.

Participation in the technical committees at DIN is fee-based, with environmental organisations paying the same level of fees as corporations. This is a major obstacle to the involvement of eNGOs.

Environmental impact



The ISO 14068 standard on Climate neutrality was designed to provide guidance on how to achieve carbon neutrality. However, there were concerns that this standard could pave the way for certified greenwashing. Given the potentially harmful impact, two ECOS members Bund für Umwelt und Naturschutz Deutschland e.V. (BUND) and Naturfreunde Deutschlands e.V. (NFD), under the coordination of KNU, were actively involved in the relevant national mirror committees to push for a binding reduction path for GHG emissions and the exclusion of carbon offsetting practices. Thanks to their involvement, many environmental concerns were reflected in DIN's position. However, the final position did not call for the exclusion of carbon offsetting and DIN still voted in favour of the standard. KNU, along with ECOS, continues to call for a quick revision of ISO 14068.



ECOS member	National Standardisation Body
Ecocity	Hellenic Organisation for Standardisation (ELOT)

In Greece, there is no participation fee required to participate in standardisation technical committees and working groups. With the support from ECOS, Ecocity was able to connect with ELOT. It also received technical assistance from ECOS when working on standards.

Best practices

The environmental NGO

- Make use of ECOS membership to establish a relationship with the National Standardisation Body and to benefit from ECOS technical expertise.
- Maintain the relationship with the National Standardisation Body, for example by inviting them to events.

National Standardisation Body

- Give environmental organisations access to technical committees and working groups free of charge.
- Organise online meetings to reduce costs.

Empowering to engage



Greek environmental NGOs can participate in standardisation free of charge. In addition, most meetings are held online, allowing a greater participation from stakeholders with limited budgets.

However, there are currently very few environmental organisations that are aware of the importance of standards as a tool to defend the environmental interests. A more proactive outreach from the **Hellenic Organisation for Standardisation (ELOT)** would allow more environmental organisations to be involved and cover a wider range of topics.

Ecocity is one of the few environmental organisations that are active within ELOT. The NGO first started to build a relationship with ELOT during a workshop co-organised with ECOS in 2019. This opportunity allowed ELOT to learn more about Ecocity, and the two organisations continued their exchanges on a regular basis.



Ecocity draws its expertise both from in-house resources, and the technical support from ECOS. Their volunteers are passionate about addressing environmental issues, while the ECOS membership ensures access to a pool of qualified experts and staff.



A key factor enabling the participation of environmental organisations in ELOT is the fact that they can join technical committees and working groups without having to pay a fee. One of the challenges that remain is that the work on standardisation can be quite timeconsuming and there is currently no funding available to cover staff costs to make the participation of environmental organisations more sustainable.

Environmental impact



Ahead of a technical meeting with the National Mirror Committee to discuss the ISO standard 59004 on circular economy, Ecocity received technical support and feedback from ECOS to prepare their position. Ecocity then prepared comments to ensure the standard provides a more robust and inclusive circular economy reporting framework. As a result, Ecocity managed to have the majority of their comments adopted in ELOT's official national position – one position closer to an ambitious standard that works for the planet.



ECOS member	National Standardisation Body
ZERO	Portuguese Institute for Quality (IPQ)

Thanks to the support of volunteers with relevant technical backgrounds, ZERO can have a positive impact on the development of standards that support environmental protection. The fact that access to most groups is free-of-charge and that most meetings are held online make it easier for environmental organisations to be involved in the standardisation process.

Best practices

The environmental NGO

- Work with expert volunteers to participate in technical committees and working groups.
- Leverage ECOS membership to connect with the National Standardisation Body and advocate for better. engagement of environmental NGOs in standardisation.
- Conduct awareness-raising activities on standards.

National Standardisation Body

- Free-of-charge participation for environmental organisations in most technical committees and working groups.
- Online meetings allow more stakeholders to participate.
- Outreach and information-sharing on existing standards with environmental organisations.

Empowering to engage



In Portugal, interested stakeholders can apply to join technical committees or working groups on a voluntary and unpaid basis. In most cases, there is no membership fee or participation fee. In addition, online meetings allow NGOs to participate more easily.

In 2023, ZERO co-hosted a national workshop with ECOS to strengthen the relationship with the **Portuguese Institute for Quality (IPQ)** and discuss how to better engage Portuguese environmental organisations in national standardisation.

After the workshop, to better promote inclusiveness, IPQ has asked environmental organisations, including ZERO, to join technical committees as representatives of environmental interest.

However, more actions are needed to better involve Portuguese environmental organisations in standardisation processes. Persisting obstacles include the lack of awareness of the importance of standards, and the lengthy procedure to accept their requests to join technical committees.



ZERO consists of volunteers who share a vision of environmental protection. Their technical backgrounds allow them to participate effectively in standardisation committee meetings as competent experts.

However, with limited financial or human resources, it can be difficult for volunteers to play an active role in technical committees, which requires a substantial amount of time.



There is no participation fee to join most of the technical committees or working groups. However, given its own limited capacity, IPQ sometimes outsources the organisation of technical committees to external stakeholders. In those cases, a participation fee can be required, which creates an obstacle for environmental organisations.

In addition, there is no funding available at the national level to support the sustainable participation of environmental organisations in standardisation, preventing them from taking an active role.

Sometimes funding can be unlocked through thematic projects and grants. For a time, ZERO was one of the ECOS members tasked with national work on standards for low-carbon cement and concrete. This provided a funding source for ZERO to kick-start their work on standards, but that level of involvement could not be maintained once the project financing stopped.

Environmental impact



Asbestos, known as a highly dangerous cancerous substance, continues to be used in **Portugal.** Its disposal remains a particularly critical challenge. This is due to the strong influence of large industry players and the lack of a legislative framework on asbestos removal from buildings. Standards can play a key role in addressing this issue. ZERO worked with other experts in the technical committee to set up a framework for asbestos inventory and the removal of asbestos from buildings. During the years 2019-2020, asbestos was successfully removed from most schools in Portugal.



ECOS member	National Standardisation Body
Swedish Society for Nature Conservation (SSNC)	Swedish Institute for Standards (SIS)

Swedish environmental organisations can benefit from financial support from the government to cover the costs of their participation in national standardisation. Integrating standard components into project proposals is another way of unlocking funding.

Best practices

The environmental NGO

- Send competent staff to become experts in technical committees and/or working groups.
- Include standardisation work in project proposals.

National Standardisation Body

Include and update information related to the standardisation processes on the NSB's website.



National government

- Allocate governmental budget to cover the costs of participation for environmental organisations wishing to join technical committees or working groups.
- Set up a structure with the aim of improving the inclusion of environmental organisations and other societal stakeholders.

Empowering to engage



To participate in standards development in Sweden, environmental organisations need to pay a fee for each technical committee they join. The amount of each fee is determined by SIS and based on the scope of work of the technical committee.

To foster the participation of societal stakeholders, including environmental actors, in 1990 the Swedish government formed the SKA-rådet (Swedish Standards Consumers and Workers Council). The initial aim was to ensure that consumers' opinions on standardisation work were heard and not drowned out by big manufacturers. The scope has since been enlarged to include other civil society stakeholders, such as environmental organisations. To accomplish its mission, SKA-rådet provides financial support (more on this below), capacity-building, and information. SSNC currently has a seat on the SKA-rådet Board.



SSNC staff have expertise which allows them to meaningfully participate in technical committees and working groups. They have been active in different technical committees on various topics, such as textiles, circular economy, and environmental communication. Over the years, SSNC staff have contributed to the standardisation process both as representatives of SSNC and as ECOS experts.



Swedish environmental organisations can apply for financial support (managed by SKArådet) to cover the costs of their standards work, which can include participation fees, travelling costs, and daily allowance. However, the grant does not cover the time of the experts.

SSNC also makes use of other funding sources, for example by integrating standardisation work into project proposals, e.g. Vinnova (Sweden's innovation agency) applications. However, project duration usually does not cover the whole standard development process, which hinders the ability of SSNC to fully influence the quality of the final product.

Environmental impact



ISO 5157:2023 Textiles – Environmental aspects – Vocabulary aimed to address the confusion within the textile industry over the terminology regarding environmental aspects. Common terminology and shared understanding are the first steps to start tackling textile-related environmental impacts. In collaboration with ECOS, SSNC participated in ISO Technical Committee 38 focused on textiles in cooperation with the European Committee for Standardization (CEN) Technical Committee CEN/TC 248, Textiles and textile products. Through their participation, they were able to influence definitions regarding the environmental aspects of textiles.

Notes and references

- And National Committees. In this document, we will use National Standardisation Bodies to refer to both National Standardisation Bodies and National Committees.
- 2 The High-Level Forum on European Standardisation is an expert group of the European Commission set up in 2023 to identify standardisation priorities in support of EU policies and legislation and discuss horizontal issues.
- 3 The Advisory Board and the Steering Committee are tasked to decide upon the content-related work of KNU. While the Advisory Board consists of representatives from BUND, DNR, NFD, BMUV, UBA, and DIN-EPH, the Steering Committee includes representatives from the main cooperation partners.
- 4 Interested parties can take a look at ongoing standard projects at KNU websites https://www.knu.info/themen/.



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