



Position Paper on the EU Standardisation Strategy

Brussels, 17 March 2022

With this position paper, the Confederation of European Security Services (CoESS) welcomes the European Commission's Communication (COM(2022) 31 final) on an EU Strategy on Standardisation, accompanied by a new Work Programme for 2022 and a proposal for a Regulation amending Regulation (EU) No 1025/2012. As an active player both in CEN and ISO, CoESS has gathered comments based on experience and views from stakeholders.

CoESS is convinced that targeted action, as proposed by the Communication, is key to deliver on the objectives of the Strategy. Our view on the EU Strategy on Standardisation is thereby guided by five principles:

- 1) ensuring that standards meet actual market needs,
- 2) enhancing the strategic dimension of standards,
- 3) attracting experts by making standardisation more flexible and easier to understand,
- 4) building bridges between the standardisation community and EU institutions, including the corresponding Directorate-Generals in the Commission,
- 5) creating consistency and cross-references between standards and EU legislation.

Based on these principles, CoESS is committed to supporting the European Commission, European Standardisation Organisations (ESOs) and stakeholder groups in implementing the new Strategy. With this paper, we make respective comments and recommendations in response to the European Commission's Communication and invite the European Commission to engage with CoESS on how to improve recognition of the strategic importance of standards for International and European policymaking.



Capacity-building: more skills and pooled expertise for the future of Standardisation

CoESS believes that future-oriented skills in standardisation are key to deliver on critical needs to manage the green and digital “twin” transition and to guarantee high-quality output. Without the required expertise within EU institutions, national **standardisation** bodies, businesses, and the broader stakeholder community, the EU Strategy on Standardisation will not be able to match the strategic importance of standards.

CoESS therefore strongly supports:

- **The set-up of an EU Excellence Hub on Standards** that leverages existing expertise across EU institutions and raises awareness of the strategic importance of standards among policymakers. The promotion of quality standards across different Directorate-Generals of the European Commission, but also in European Parliament and among Member States, is part of the core activities of CoESS, and we see a strong potential to raise awareness of their benefits for strategic policymaking. We believe this to be a central building block to enhance recognition of the strategic importance of standards, and are therefore deeply committed to support any related activities.
- **The planned Standardisation Booster** for European researchers. We however highlight that this should be focused on areas where “critical standardisation urgencies” exist. The mere absence of a standard does not justify the need for the development of a new standard.
- **The multiple initiatives announced in Section VI of the Commission Communication**. CoESS is committed to support the European Commission in raising awareness of these activities.

Flexible standardisation processes to deliver on the twin transitions

The digital and green transitions are accelerating at unprecedented speed, creating already a number of “critical standardisation urgencies” - such as in Artificial Intelligence. CoESS therefore supports the European Commission in its statement that European standardisation must become more agile, flexible and focused. At the same time, it must remain needs- and market-driven. It is key that the European Commission identifies areas of “critical standardisation urgencies” in the context of ongoing and future legislative processes, such as the European Artificial Intelligence Act. Likewise, we underline that, as the Communication rightly states, “Standards are not a purpose in itself”. Furthermore, European standards must always adhere to highest quality needs reflecting European values, fundamental rights, consumer protection, social norms and market realities.



In this context, CoESS welcomes:

- The set-up of a high-level forum to help anticipate “critical standardisation urgencies”. CoESS remains available to provide input to any related stakeholder consultations.
- The foreseen collaboration with ESOs on new approaches to modernise the standardisation process and calls on ESOs to propose solutions for more efficient and inclusive governance frameworks - including free access to standards. If standards would at least be freely accessible to representatives of EU institutions, this would significantly support activities that promote the strategic importance of standards for EU policymaking in line with the new legislative framework approach.
- Enhanced transparency of the Standards making process, including an annual dashboard on the planned, current and completed standardisation activities.
- The announced review of Regulation 1025/2021.
- The idea to strengthen the European approach to international standardisation. We underline however that European standards must always be fit to reflect market realities in Europe and warn against a one-size-fits-all mirroring of ISO Standards and Structures at European level. Adaptation of International standards to European values, fundamental rights, consumer protection, social norms and market realities have always been the strength of European Standardisation and is a prerogative for Europe being a global frontrunner in standardisation.

Better recognition of the strategic importance of European Standards

CoESS fully supports the European Commission statement that “While European standardisation has so far been a success story (...), the strategic importance of standards has not been adequately recognised at the cost of EU leadership in standards-setting.” We encounter this reality in our activities on a regular basis and believe that much more must be done to leverage the strategic value that standards can bring - also in the context of the new regulatory framework approach.

We therefore invite the European Commission to a dialogue with CoESS and note that:

- The European Commission recognises “critical standardisation urgencies” to manifest the EU’s global leadership in green and digital technologies. We thus welcome mandate 63 of the annual Work Programme for 2022 on safe and trustworthy Artificial Intelligence Systems.



We stress however the importance to set in place such mandates before EU legislation in respective matters is proposed (e.g. in this case the EU AI Act) in order to deliver timely standards, and hope that respective coherence can be enhanced through the establishment of the announced high-level forum.

- The European Commission underlines that standards for cybersecurity or the resilience of critical infrastructure carry a strategic dimension.

CoESS fully supports the understanding that standards have a particularly strategic relevance when it comes to the protection and resilience of critical infrastructure. We therefore highly welcome this reflection in the Communication. We however also note that the European Commission has excluded a provision of the promotion of valuable Standards that can enhance the protection of critical infrastructure from its proposal for a Directive on the Resilience of Critical Entities (2020/0365). European Parliament has recognised this shortcoming in its report on the dossier, but the case shows that it is important to enhance awareness of the added value of European Standards within all EU institutions, including the Commission's own services across all Directorate-Generals.

- The European Commission assesses the added value of Standards in European business services.

We however underline that, as previously mentioned, Standards needs to respond to either a regulatory or market need and are not a purpose in itself. Furthermore, the Communication misses out to mention in its following paragraph that public procurement is a tool to improve the uptake of standards also in services. CoESS would be glad to further discuss these two matters with the European Commission.



About CoESS

CoESS acts as the voice of the private security industry, covering 23 countries in Europe and representing 2 million security officers as well as over 45,000 companies. The private security services provide a wide range of services, both for private and public clients, ranging from Critical Infrastructure facilities to public spaces, supply chains and government facilities.

CoESS is recognised by the European Commission as the only European employers' organisation representative of the private security services. Representing a labour-intensive sector, CoESS is actively involved in European Sectoral Social Dialogue and multiple EU Expert Groups - including SAGAS, SAGMAS, LANDSEC, RAILSEC and the EU Operators Forum for the Protection of Public Spaces.

In addition, CoESS actively participates in developing European standards for the private security industry, as this is a direct and concrete action deriving from its core values, namely quality, trust, compliance and safety. This work mostly concerns CoESS activities in the CEN Technical Committee (TC) 439 on "Private Security Services". CoESS also closely follows the work in CEN TC 447 on "Services - Procurement, Contract Management and Performance Assessment", CLC TC 47 on "Alarm Receiving Centers", and the CEN-CLC Sector Forum on Security (SF-SEC). At international level, CoESS is engaged in the work carried out by the ISO TC 292 "Security and Resilience".

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