



Response to the Stakeholder Consultation Guidance Document on practical aspects of the implementation of Reg. (EU) 1025/2012

CoESS' cooperation with European Standardisation Organisations (ESOs)

The Confederation of European Security Services (CoESS) welcomes the European Commission's efforts to elaborate the Guidance Document on practical aspects of the implementation of Regulation (EU) 1025/2012 in consultation with stakeholders.

CoESS acts as the voice of the private security industry, covering 21 countries in Europe and representing 2 million guards, over 45,000 companies and generating a turnover of over €40M. 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.

CoESS has actively contributed to the development of the first CEN Standard regarding private security EN 15602 "Security Services Providers - Terminology", as well as EN 16082 "Airport and Aviation Security Services" and EN 16747 "Maritime and Port Security Services". Catherine Piana, the Director General of CoESS, chairs the CEN TC 439 and contributes to the work of CEN TC 447 on Horizontal Services Standards to ensure that future standards are relevant to the industry and can be implemented to the mutual benefit of suppliers and customers of private security services.

Need for better communication and alignment between the European Commission and ESOs

CoESS considers better communication and alignment between the European Commission, including its responsible Directorate Generals and Units, and ESOs to be of high priority. It is crucial that both identify jointly, in close liaison and consultation with industry, the needs for new or updated standards. CoESS repeatedly witnessed that European Commission officials are often not well enough informed about current activities of the work done at ESOs. It is however crucial that one knows what the other is doing to ensure regulatory relevance and uptake of standards. As for the security sector, a first step of better cooperation could be that EU officials liaise with the CEN Industry Forum on Security, which has been set up earlier this year. CoESS has made a suggestion in

that sense to the Chairman and Secretariat of the Forum.

Responsibility of the European Commission as regards the preparation and adoption of standardisation requests

In this regard, CoESS supports the objective and structure of the guidance document as outlined in chapter 3.1 in the European Commission letter Ref. Ares(2019)4465012. Better links between legislation and standards are strongly required. It is also important that a clear case for producing a standard is made, i.e. that the relevant stakeholders are consulted and express their opinion on the need for, and expected benefits of, a given standard. CoESS has observed that in some instances the absence of a standard has been the only reason to start working on one. There needs to be either a legislative requirement or a need articulated by the industry, as highlighted above. Alternatively, the standard will not be used.

Better alignment with industry and simplification

In addition to these requirements, there is an additional challenge, which is to associate companies throughout the standardisation process: (1) they have to identify the need for standards, (2) actively contribute to writing the standards, (3) use the standards, and (4) promote them to the stakeholders. The role of industry in the assessment of a standard is a matter that CoESS believes is entirely missing in the proposed structure of the practical guidance document, as outlined in chapter 3.2 in the European Commission letter Ref. Ares(2019)4465012.

To identify the potential market relevance of a standard and the need or expressed demand, it is crucial to first talk to the concerned private stakeholders. As for the active contribution of private stakeholders to standardisation work, their application and promotion, the engagement of companies is a real issue. They need to understand what is in it for them, find the right people to work on the standards over and above their “paid work”, as well as the financial resources.

We would further advise to use a “company-friendly” language in standardisation so that stakeholders can “buy in” the process. The standards world too often uses an obscure language, made of jargon and technical reference to notions that are not understandable to the corporate world. The European standardisation process is very complex, and therefore it would be helpful to have some degree of simplification. In this regard, we also suggest using multipliers, such as trade associations, NGOs, trade unions, to select and coordinate the effort on standards.

These are matters that we believe deserve strong notion in the practical guidance document in order to make the important work done at ESO-level more impactful.



Confederation of European Security Services

CoESS remains a strong supporter of European standardisation process and is willing to support a better alignment of EU policies and standardisation. We remain of course at the European Commission's disposal for any further information.

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