

ECCREDI's Contribution to:

Discussion paper in preparation of the future Commission Communication "Towards an increased contribution from standardization to innovation in Europe"

DG Enterprise (ENTR/13/JA D(2007))

II. HOW STANDARDISATION CONTRIBUTES TO INNOVATION

1	<ul style="list-style-type: none">▪ Do you agree with this analysis of the potential for standards to aid innovation? YES we can agree with the general analysis.▪ How do you think that standards may contribute to market creation? Standards can help promote the free movement of goods and services on the market and speed up market penetration. New market segments can emerge as a result of well established new requirements of standards.▪ And how do you think that standards may contribute to market development? Through assisting in removing barriers to trade as much as possible and creating common European language for expressing and evaluating characteristics of products.▪ Under which conditions do you think that standards may lead innovation? And when will standards follow innovation? Standards should be made performance based, their goals should be based on research or introduced following international agreed systems (communication, expressing data, etc..). It is recommended in this respect to consult the work of the Inter- Jurisdictional Regulatory Collaboration Committee (IRCC) with members from America, Japan, Australia, New Zealand, and Europe. Standards will follow the innovation of products developed by individual companies with the aim to gain market advantage. Standards can surely facilitate innovation but not lead it. To prevent market distortion, deemed-to-satisfy provisions should balance testing costs. However, if performance calculation standards are associated with appropriate regulation of incentives, they can really be an effective tool to create a market and pull innovation. Moreover, when standards allow to take account of new performance criteria linked for example to sustainability, health, etc.. they are also a way to pull innovation.▪ Are there other examples of how standards can support innovation? Providing evaluation and classification means for products covered by technical approvals, which are the main means to provide market access to innovative construction products. Technical approvals are a good tool to harmonize requirements in various countries and they have proved to be a flexible way to support innovation. Technical approvals provide manufacturers adequate confidentiality and protection against misuse of information by competitors this is something standardization can never provide.▪ Are there specific examples of how standardisation impedes innovation? When standards are prescriptive they often hamper innovation.
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III. WHICH CHALLENGES NEED TO BE ADDRESSED IN ORDER TO ENHANCE THE ROLE OF STANDARDIZATION IN SUPPORT OF INNOVATION?

2	<p>III.1 Challenges in the process of development of standards</p> <ul style="list-style-type: none">▪ Are the key challenges regarding standards development addressed? Which are the other challenges? For construction products, durability, functionality and compatibility assessment are keys to satisfactory standards. Pre-normative research is a necessary step before
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	<p>standardization is possible. Participation of all parties concerned should be ensured.</p> <ul style="list-style-type: none"> Does the principle of national delegation, as opposed to direct representation, favour or make more difficult access of SMEs and other interested parties to European and international standardisation? There are strict limits in practice to what SME associations can achieve. To be effective, the drafting of standards should be an industry driven “bottom-up” process. Where standards are drawn up in support of innovative products or services. The direct participation of representatives of the interested parties concerned is indispensable. Indeed the forthright participation of experts directly involved in the innovation process is absolutely fundamental and cannot realistically be delegated to third parties or SME representative bodies. This remark should not be compared to standardisation activities carried out in accordance with the terms of a standardisation mandate issued by the European Commission in the context of facilitating the development of the “Single Market” and which has nothing directly to do with the topic of “innovation”. In the context of this question therefore, there is no substitute to the direct participation of the experts involved in the innovative product or service and any assistance offered by the Commission should be aimed at facilitating their participation. <p>This assistance should be supported. However, there is still danger that the expert from a specific company will try to negotiate for his company market advantage. Here government bodies and academic representation should ensure sanity in the process.</p> <p>European funding should be made available for SMEs to allow them to participate in national and EU activities in the field of standardisation.</p> <p>The conditions of access to standards bodies and complex procedures may constitute barriers to contributions not only from academics and researchers, but also end users and architects (who as a profession may be considered close to the end user in this sector).</p> <ul style="list-style-type: none"> Which conflicts can emerge between standardization and intellectual property rights? If standards are mainly performance based there should be no conflicts between standardization and IPR.
3	<p>III.2 Challenges to the usage of standards</p> <ul style="list-style-type: none"> Are key challenges regarding the usage of standards addressed? YES Which are the other challenges? Language might be a problem for SME’s! Sometimes the standardization process is slowed down by missing translations of standards. Standards should within their scope provide specified room for deviations. <p>In addition to language, the definition of terms covers different concepts. For example, the term “feasibility study” covers different services in each of the EU Member-States. In fact, the breakdown of the stages of construction projects differs from country to country and so does the range of services falling under each stage description. Terminology standardization would therefore definitely help the client to understand the kind of services that can be expected. Moreover, insurance companies would better understand the kind of services and risks which need to be covered.</p>

IV. TURNING THE EUROPEAN STANDARDISATION SYSTEM TOWARDS INNOVATION

4	<p>IV.1. A vision for a European standardization system turned towards innovation</p> <ul style="list-style-type: none"> Does the vision include the key objectives of a standardization system turned towards innovation? Which are the other criteria? The text should also reflect on the complementarities between standardization and the system of technical approvals which is being used in the construction market to allow innovative products on the market (technical approval bodies are organized in EOTA, in
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	<p>the framework of directive 89/106/EEC, and UEAtc for all other purposes).</p>
5	<p>IV.2 Proposals for making standards development more supportive of innovation – Improve the input from R&D to standards-making</p> <ul style="list-style-type: none"> ▪ Which steps can be taken to reinforce the role of standards in knowledge transfer? Especially in the construction sector, standards are recognized as the state-of-the-art and it requires certain stability. Therefore good proportions should be established between prescriptive standards and performance oriented ones. However, standards should not become textbooks. For SME's there is a need to explain new rules and requirements which might be introduced so as to enable them to adapt their businesses. Such changes might indeed promote innovation as they push the industry to improve its performance. ▪ What could be done to increase the awareness of researchers with regard to benefits of the different approaches regarding dissemination and protection of results? Researchers should be made aware that standardization is also an important indicator of Science industry relations and should get, next to credits for scientific publications and number of patents emerging from their work, also rewards for their contribution to standardization. This is not sufficiently the case for the moment. Scientists should be aware that as soon as information is put into the standardization process, it is freely available which should be normal for all cases where new knowledge is a result of research sponsored by the EC or by governments. ▪ Which other measures can tackle the 'standardisation gap'? A higher recognition of standardization as Science Industry Relation. ▪ What is your opinion on the use of 'open' approaches', such as open access, open publications, open software? We feel that the open systems are those that play an important role in areas where there are no rules yet. As soon as there are several solutions in such open areas, there is a need for standardization. Past experience has shown that open systems are those which have secured a dominant market position. <p>Collective research should be stimulated. Pre-normative research and normative research (like Round Robin tests) is not always seen as an interesting area. For companies, it is not considered as their "core businesses". Why should they do research for their competitors? Therefore it should be better to work together (with the clients) in collective research projects. These projects should be stimulated by funding them (partly) in R&D programmes.</p>
6	<p>IV.2 Proposals for making standards development more supportive of innovation – revise the process of standardisation in order to turn in towards innovation</p> <ul style="list-style-type: none"> ▪ Do you agree with the need to revise the issues regarding the standardization process at European and international level? Which other issues should be addressed? How can the standardization process be changed to better accommodate innovation? In the construction industry, the standardization process should follow the development of technical approvals, which are primarily based on ETA-Guidelines or Common Understanding of Assessment Procedures (EOTA) or UEAtc Guides. ▪ How do you see the role of the European Standards Organisations in a more innovation-friendly European standardisation system? The standards organizations should not be the only ones. The notified bodies or key reputable organizations can produce evaluations for an innovative product. There is a need to make arrangements such that the speed of the standardization process is comparable with the speed of the innovation process. ▪ Do you have a particular suggestion regarding the current organisation of European and international formal standardization regarding the development of standards for the global market? Most of the TCs are led by academics from universities. This should be balanced with industry and applied research organizations. Standards based on consensus of lobbies can hardly become recognized as global, unless a lobby is global while scientifically

	<p>oriented standards have good chance to become global and have worldwide recognition. Distinction should be made between e.g. innovative methods of measurements or statistical analysis which should be a matter of standardization, while innovative products and technical solutions should remain out of standardization and use EOTA like processes.</p> <p>European associations might be able to play a more important/active role in speeding up the standardization process. European associations representing respectively users might work together directly in the standardization process.</p>
7	<p>IV.2 Proposals for making standards development more supportive of innovation</p> <p>– Measures for the inclusion of SMEs in standards-making</p> <ul style="list-style-type: none"> ▪ Are there other measures for the participation of SMEs in standardization activities that should be considered? The mechanism of RTD funding for the development of standards should be reactivated again. At present not enough importance is given in FP7 to actions related to the development of standards and pre-normative research supporting future standardization. ▪ Which measures need to be taken in order to ensure a better access of SMEs to standards (i.e. costs, coaching, awareness raising, etc.)? Firstly the question of the cost of purchasing standards will always remain an issue, but by the same token someone has to pay for them, so this is more a question of who is best placed to carry the burden of cost. Coaching and awareness raising whilst important in practice is “over-hyped”. Well managed SMEs will in most instances be able to cope with the texts of standards affecting their businesses; only in very exceptional circumstances should “coaching and awareness raising” activities be required. SMEs will need several categories of standards depending on the nature of their work. Installers will probably need easy, brief and more or less prescriptive standards describing how to do properly the job while designers will need more guidance oriented ones. ▪ How can SME organizations be persuaded to give standardization the necessary priority? SME organizations do not need to be “persuaded”. These organisations exist to respond to the needs of their members. If their members ask them to make standardisation a “priority” they will respond and there is no need for any initiative in this respect from public authorities.
8	<p>IV.2 Proposals for making standards development more supportive of innovation</p> <p>– Measures for fostering the development of standards in service sector</p> <ul style="list-style-type: none"> ▪ Are there particular measures for fostering the development of standards in the service sector that should be considered? As mentioned before, standards including those in the service sector should be mainly performance based. This might call for new research in order to better identify customer needs expressed in expected or required levels of performance. ▪ How can interoperability issues be addressed better? Through prescriptive standards. Interoperability would benefit from a standardized terminology and cross-border clients would gain a better understanding of the services offered. ▪ Which informal forms of collaboration such as joint projects can support this process? International organizations, associations and joint research.
9	<p>IV.2 Proposals for making standards development more supportive of innovation</p> <p>– The role of education</p> <ul style="list-style-type: none"> ▪ How can European universities best contribute to awareness of standardization and its benefits? An important point as mentioned before is to make that contributions of universities to the standardization process get a better internal evaluation as indicators in Industry

	<p>Science Relation assessments, at present ISR is being measured only by the number of scientific papers and patents, but involvement in standardization is also a major element and that is being overlooked very often. Explaining the role of standards in industry and the drafting of specifications is (or should be!) a part of any course in engineering subjects.</p> <p>Key contributions should be an implementation of scientific methods of measurements and relevant criteria.</p> <p>Universities should be stimulated to have (more) PhD students doing pre-normative research. PhD research should be stimulated to address methods characterize performance. New methods are needed to be able to characterize the performance and the durability of performance of e.g. building materials.</p> <p>Create awareness by inviting guest speakers at the universities, explaining the importance of standardization by showing actual standardization issues.</p>
10	<p>IV.3 Proposals for facilitating the usage of standards in support of innovation</p> <ul style="list-style-type: none"> <p>▪ Are these measures relevant for the promotion of the usage of standards in order to enhance innovation? Which other specific measures would you recommend for this aim?</p> <p>Standards provide limited possibilities for supporting innovation as there is principle conflict between widely open standardization process and necessary protection of the owner of innovative ideas and new solutions.</p> <p>▪ Which measure should be taken in order to ensure better access of SMEs to standards?</p> <p>Standards should be made quickly available in the proper language of the individual SMEs. Complementary, clarifying guides should explain clauses where relevant and provide tools for improved use of the standards (e.g. checklists, ICT-tools, etc.). Standards should also be made available at the lowest possible cost. On the other hand, public authorities and in particular the Commission should not be led astray by remarks and allegations that for one reason or another SME have a very particular problem or require special needs. For sure isolated cases of particular difficulties do exist but it would be wrong to assume that these are either widespread or generic.</p> <p>▪ How do you think that standards may be used in order to promote innovative products and services?</p> <p>In the same way as all standards are. The firms using them will themselves know what to do.</p> <p>Innovative products cannot be standardized but their characteristics can be measured with use of innovative methods.</p> <p>▪ What are the main challenges to be addressed with regard to standards in public procurement? How do you think that standards can be better applied in public procurement?</p> <p>Standards are normally called up in public procurement procedures as part of the contract documents. The way in which they are selected and used is a matter for contracting authorities and their advisors; there is no need to specifically intervene in a process that is – or should be – well understood.</p> <p>Public procurement process itself give ample possibilities for standardization (form and way how information should be presented, evaluated, certified, etc..)</p> <p>▪ Is there a particular area in which you consider that usage of standards in public procurement can have more impact on innovation?</p> <p>There are definitely possibilities but differs from sector to sector or case by case. Individual analysis is required.</p> <p>▪ What should be done with regards to cases in which a plurality of standards is available in the market? In those cases, how can the many existing standards be limited to a set of necessary, up-to-date standards?</p> <p>This is of course a huge task which needs proper management, planning and organization to avoid duplication within standardization bodies and amongst them. In the construction sector, wherever there is a mandate for ETAG, no standardization process should start. There is also certainly the need to simplify the huge set of existing standards.</p> <p>EU standards are a prerequisite for establishing an EU level playing field. The</p>

	<p>Eurocodes would be a good example of such standards.</p> <ul style="list-style-type: none"> Which incentives can be provided in order to increase the uptake of standards? Standards should be made easily accessible and at the lowest possible cost and the forces of supply and demand should take care of themselves. No specific incentives should be required since this should not be a marketing operation!
11	<p>IV.4 Standardisation in particular sectors</p> <ul style="list-style-type: none"> Are there other specific issues that you would like to address regarding the role of the Commission in promoting the development and usage of standards in particular areas? We can generally align with the proposed measures and specifically the one advocating that research needs linked to the development of standards should be taken up in the ETP agendas. Also in this respect we feel that research institutes such as those involved in ENBRI, FEHRL and ELGIP should be given appropriate recognition for their activities in this field. <p>Whereas harmonizing construction rules to facilitate innovation deployment throughout the European market is recognized as the n°1, short and mid term priority in order to give them at once adequate economic momentum on the basis of specific harmonized justification methods and assessment schemes complying with the practical needs of designers, contractors, supervisors or works and market surveillance authorities of Member States.</p> <p>Ethical consideration might to have to be taken up as well.</p>
12	<p>IV.5 Reform of European Standardisation</p> <ul style="list-style-type: none"> Do you agree with these areas to be considered for the reform of the European standardization system? Which other areas should be put forward? We in particular agree that standards should be developed in a transparent bottom up approach, based on consensus. We are not convinced that a specific reform of the so-called “European standardization system” is required. As the old saying goes, “if it ain’t broke don’t fix it!” Are there specific activities of national standardization bodies which should be considered by the European Standards Organisations? There is no need for changes in system, but well inside standardization bodies. It is consider that the "new approach" whereby the Commission under pressure from e.g. the Member States is transferring, de facto, more and more its legislative responsibility to the standardization bodies is potentially counter-productive. Are there more radical measures that would benefit the European standardization system and also aid innovation? Collaboration with government authorities and protection of public interest and interest of end users in the standardization process should draw permanent attention of all involved. Thorough analysis of interests represented in technical Committees and based on results ensuring that attention of those missing ones was drawn and those prevailing are eliminated. <p>There is a need for a strategic agenda for the construction sector aiming at achieving the harmonization of construction rules (regulations, technical rules, standards, codes, guides, knowledge) by 2030. There is also a need for a clearly organized framework/structure (involved stakeholders, strategy, methodology, Roadmap,..) able to drive the construct rules harmonization process with the aim of producing a coherent European corpus of construction rules.</p>