



Internal Market Department  
2008/

Ms Renate Weissenhorn  
Head of Unit for Standardisation  
DG Enterprise and Industry  
European Commission  
200 rue de la Loi  
1049 Bruxelles

9 May 2008

Dear Ms Weissenhorn,

We would like to thank you once again for your interesting presentation on the Commission's Communication on Standardisation and Innovation on 3 April.

BUSINESSEUROPE supports the Commission's effort to look at how standardisation can facilitate innovation and we are pleased that the Commission's views are largely in line with several of the messages that were highlighted in our position paper on creating a pro-active standard setting policy for innovation, which has been enclosed for your information. BUSINESSEUROPE stresses the need for concrete action to follow up the policy recommendations of the communication.

We believe that the success of standardisation is based on the development of standards with an active involvement of business based on market needs, and their voluntary use. We are pleased the Commission supports this, whilst also recognising the importance of standards development at the global level.

However we would like to draw your attention to a few elements of concern and provide some remarks that could serve as input to the Commission's future work in this area:

- 1) This communication should serve as a political tool to help convince other Commission DGs of the appropriateness of using standards as a flexible instrument instead of detailed legislation;
- 2) While standardisation is an essential means of facilitating innovation, it does not drive innovation;
- 3) When developing policies and concrete action, a distinction should be made between consortium (business driven) standardisation and formal standardisation. Consortium standardisation tends to take place in the initial phase of innovation, with formal standardisation being more prominent in the growing phase;

- 4) The aim to facilitate the access to standardisation of all interested stakeholders may be counterproductive to speeding up the standardisation process;
- 5) Additional financial support to specific groupings at European level may jeopardise the existing system of national delegation, which facilitates the participation of consumers, NGOs and SMEs in the process;
- 6) The Commission's intention to provide free access to standards developed in support of EU legislation and policy needs thorough consideration. If alternative public financing is not provided, it may lead to increased participation fees for those actively participating in the development process, which would be counterproductive to the goal of having a wider participation of SMEs. It might also lead to a lower perception of the value of standards if they are provided free of charge.

We would be happy to have the opportunity to meet you to discuss these points further.

Yours sincerely. *Best regards,*  
*J. Chauvin*

Jérôme P. Chauvin  
Director  
Legal Affairs Department  
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