



Annex III organisations comments on the CEN and CENELEC governance review

February 2024

CEN and CENELEC have embarked on a governance review process. The process and preliminary outcomes were presented at the CEN and CENELEC Joint Policy Groups meeting on 31 January and at a meeting between the CEN-CENELEC Management Centre, the CENELEC Vice-President Policy and the Annex III organisations (ANEC, ECOS, ETUC and SBS) organised on 9 February. At these meetings Annex III organisations were invited to submit comments on the proposed review.

➡ **The current governance review should also focus on how to further enhance inclusiveness and the role of Annex III organisations in CEN and CENELEC**

The Annex III organisations welcome the CEN and CENELEC governance review exercise. Carrying out a governance review should support a better integration of CEN and CENELEC structures, ensure transparency, accountability and efficiency in decision-making processes and help adapt to evolving needs and challenges. Moreover, from our perspective this governance review should also focus on how to enhance inclusivity and the role of Annex III organisations, and their national members, in CEN and CENELEC.

The European Standardisation Strategy published in 2022, “calls on the European Standardisation Organisations (ESOs) [...] to modernise their governance to fully represent the public interest and interests of SMEs, civil society and users”. In this respect, the Annex III organisations provided in December 2022 a [list of proposals to CEN and CENELEC](#). We ask that the governance review includes the analysis and consideration of these proposals.

➡ **The governance review should not lead to a less inclusive decision-making process**

Annex III organisations ensure that a diverse range of perspectives and expertise is considered as part of the decision-making process in the CEN and CENELEC governing bodies and in the development of European standards. SME representatives, for example, often bring practical insights and specific challenges that might not be readily apparent to larger corporations. Similarly, the involvement of

consumer representatives, environmental NGOs, and trade unions ensure that decisions take into account broader societal concerns such as safety, sustainability and inclusivity. Overall, the involvement of Annex III organisations and their respective national members, enriches standardization discussions by promoting inclusivity, transparency, and the consideration of the broadest stakeholder interests. This involvement becomes even more vital with the extension of the New Legislative Framework (and harmonised standards) to fields such as Artificial Intelligence, and to aspects such as fundamental rights. It is important that the current governance review does not lead to a situation where the access and possibilities to bring into the discussion the different perspectives of the Annex III constituencies (by definition underrepresented in standardisation) are restricted. In this respect Annex III organisations have already expressed concerns towards the move to the organisation of “members only” sessions initiated by the CEN and CENELEC Technical Boards. Such a move, without setting at least clear criteria (e.g. purely internal administrative issues) on the topics that would be subject to these member only sessions could lead to a less inclusive, rather than a more transparent and efficient, decision-making process.

➤ **The need to recognise the unique role of the Annex III organisations through an “Associate membership”**

Annex III organisations have been granted a special role by Regulation 1025/2012 in relation to the European Standardisation System. They play a key role in facilitating the participation of stakeholders traditionally underrepresented in standardisation by providing forums for engagement, promoting awareness of standardisation activities, and advocating for the inclusion of weaker voices in standards-setting bodies. This is recognised in CEN-CENELEC Guide 25, and our individual partnership agreements, which provide Annex III organisations with added rights and obligations.

The current governance review offers opportunity to recognise this special role by creating an “Associate membership” (without voting rights) that would illustrate the different role, rights and obligations of Annex III organisations from other CEN and CENELEC partner (and liaison) organisations. Indeed, we think being granted the title of “CEN-CENELEC Associate member” would be of special value in the ISO and IEC environment where the term “Annex III organisation” is often not known or understood, but also where increasing numbers of (harmonised) standards are being drafted and then adopted at the European level.

➤ **The future of the CEN-CENELEC Societal Stakeholders’ and SME Working Groups**

In the context of the current governance review, there have been discussions on whether the current structure- including a CEN-CENELEC Societal Stakeholders Working Group (SSWG) and a CEN-CENELEC SME Working Group (SMEWG)- should be kept or whether both should be merged into a single group. We advocate for keeping both and instead hold common sessions to discuss common points of interest.

Societal stakeholders and SMEs do have distinct perspectives, priorities, and needs. Keeping the groups separate ensures that their unique viewpoints are adequately represented and prevents the dilution of their interests. Moreover, maintaining separate WGs allows for a more focused and efficient discussion of relevant topics and tailored approaches to engagement and representation to address the diverse needs of each group effectively.

Implementing a structure similar to the CEN and CENELEC Technical Boards, where common sessions between both groups are organized back-to-back with meetings of each of the groups, could provide a balanced approach to collaboration while preserving the distinctiveness of each WG. This arrangement would allow for shared discussions on common topics, fostering collaboration and synergy, while also providing dedicated time for each group to address its specific concerns and priorities. These common sessions could be used to exchange with other relevant groups such as the CEN-CENELEC Membership Relations and Monitoring Committee (MRMC) that evaluates the fulfilment of membership criteria and identifies best practices for the continuous improvement of the system.

We also recommend extending the membership of the SSWG to National Standards Bodies, as is the case of the SMEWG. Such an expansion of the membership would enable a strengthened dialogue and enhanced coordination between the national and European levels.

Finally, in relation to both groups, a clear action plan- with leaders for each action- should be defined after each meeting to ensure progress, and effective implementation of agreed initiatives.

➡ Need to ensure the representation of each Annex III organisation in the relevant Standing Committees

Finally, we must stress the importance of ensuring that each Annex III organisation can be represented in each relevant CEN and/or CENELEC Standing Committee (SC). We see this as vital in relation to the SC on Policy & Strategy, and perhaps the SC on Eligibility and Governance depending on its final scope.

We would like to stress the need for CEN and CENELEC to carefully consider whether the contribution of Annex III organisations may be relevant when setting the Terms of Reference (ToR) of each SC. Indeed, we are ready to contribute to the setting of the ToRs.