

Position paper

# Policy paper on standardisation

Key statements and recommendations

November 2021

Electro and Digital Industry Association

## Standardisation creates the architectural framework for the transformation towards the All-Electric Society

To achieve the transformation towards a climate-neutral and sustainable society and economy, while maintaining prosperity, the responsible and consistent use of technology and innovations as well as extensive electrification and digitalization towards an All-Electric Society is required.

The All-Electric Society will be characterized by the massive expansion of renewable energy generation and the continuous and intelligent coupling of electricity use in climate-relevant sectors such as energy, industry, mobility and buildings. The primary energy efficiency of a system allowing the direct use of electricity, such as in electric motors, is very high. Nevertheless, the indirect use of renewable electricity in form of green hydrogen and e-fuels, for instance, will also make an important contribution in this society. The green transformation is only possible with electricity. In this context, the cross-sectoral data and information integration of all applications, in addition to energy technology coupling, is of particular importance.

This task cannot be accomplished without a comprehensive framework, interface definition and the creation of interoperability through standardisation<sup>1</sup>. The standards required are largely attributable to the field of electrical engineering, electronics and information technology.

Standardisation must be clearly oriented towards this purpose. It has the essential integrative task of bringing together all stakeholders involved. The standardisation process must become more agile and digital, and standards must be cross-sectoral and available in digital formats.

Standardisation thus becomes an enabler of the transformation of our society and economy towards climate neutrality, securing a future worth living.

### 1 Standardisation and consortia standardisation

Technical standards are both "standards" as consensus-based documents with broad stakeholder involvement, issued by recognized standardisation organisations, and "standards" as consortia documents where consensus and stakeholder involvement are limited.

Both, standards and consortia standards have their place and their justification in the technical world. We see standards everywhere where a high level of stability is required and where broad acceptance across stakeholders and domains enables wide

<sup>1</sup> When speaking of standards or standardisation in this document we mean consensus-based standards with broad stakeholder involvement (equivalent to the German „Normung“) in delimitation to consortia standards where consensus and stakeholder involvement are limited (see also chapter 1).

application. This is especially true for supporting the fulfilment of technical requirements in laws. Consortia standards are mainly useful and to be found in areas where processes and new technologies are still changing very dynamically, such as in information and communication technology, to describe interoperability, interfaces and performance. In our view, consortia standards are not suitable for specifying legal requirements because of the limited consensus. Whenever it makes sense, attempts should be made to transfer stable and established consortia standards into the standardisation process.

## **2 Role of industry / state (politics) / standardisation organisations**

Standardisation is the task of industry; all interested parties can participate to ensure a broad societal consensus. The contents are defined in the technical committees, where the state has a right to participate but no further-reaching rights of intervention. In Germany, the Standards Agreement<sup>2</sup> also regulates the processing of projects of public interest in accordance with this principle. Politics and the standardisation organisations support each other by shaping the framework conditions. This proven division of labour must be maintained in the future. Considerations of transforming the standardisation organisations into state agencies are not expedient.

However, standardisation can also be an industrial policy or geopolitical instrument. It is therefore necessary to bring together the proven "bottom-up approach" of market-driven standards and the political-strategic "top-down approach" through cooperation between government/politics and industry in order to develop a common European strategy. To this end, a continuous exchange between the European Commission, Member States, European Standardisation Organisations (ESOs) and industry must be established.

## **3 New Legislative Framework (NLF)**

The NLF, with its approach of using harmonised standards to concretise abstract statutory requirements, has proven itself as an instrument for placing products on the market. Its outstanding importance also lies in its very broad application, which covers a large proportion of all non-food products. There is, however, an urgent need for a re-organisation of the process for drawing up harmonised standards (see Section 4).

Technical standards developed in collaboration between the European standardisation organisations and the Harmonised Standards Consultants (HAS Consultants) should

<sup>2</sup> The Standards Agreement ("Normenvertrag") constitutes a public-private partnership between the Federal Republic of Germany and DIN (German Institute for Standardisation), in which DIN is acknowledged as the national standards body in Germany.

usually be the only standards referred to in European legislation. Other approaches, such as "common specifications" (e.g. laid down in the Medical Devices Regulation or the draft AI Regulation), may only be used as a last resort under certain conditions.

"Implementing Acts" to determine the safety level of standards (e.g. provided for in the draft regulation on general product safety) are not appropriate, since the determination of the safety level and the presumption of conformity - whereby compliance with the standard is also presumed to be compliance with the statutory provisions - require broad societal consensus, which does not exist due to the predominant role of the European Commission within the concept of "Implementing Acts". In addition, this further promotes a divergence between European and international standardisation.

## 4 Improving the process for drawing up harmonised standards

In principle, we recognise the European Commission's claim to safeguard the protection requirements in harmonised standards as a consequence of the James Elliot ruling<sup>3</sup>. However, the hence established process must be improved. The delays, some of which are significant, must be structurally eliminated. And what is at least as serious, the divergence of the proven "parallel" standardisation in the European and international standardisation organisations must be prevented.

Measures include a.o.

- More leeway for ESOs in standardisation mandates. Too detailed mandates with too short and hard deadlines prevent innovative approaches and can lead to lower quality
- Agreed evaluation "standard" for HAS consultants to ensure consistent evaluations
- Mandatory training of standardisation managers, standards committee / technical managers on formal and legal requirements of harmonised European standards and recruitment of legal assistance in the ESOs.
- Early involvement and "integration" of HAS consultants in the standardisation process to incorporate legal requirements and aspects into the standard from the very beginning.
- ESOs' standardisation managers need to make sure that the requirements of the HAS process are met.

Speed is important, especially when developing new standards in high-technology areas. However, other criteria must also be considered (including quality, legal certainty, stakeholder involvement, expenses for design and

<sup>3</sup> The judgment qualifies standards listed in the Official Journal of the European Union as part of European law. The European Commission derives from this the fulfilment of certain legal requirements by the harmonised European Norms and subsequently an obligation to review them more closely.

modification of products). Agile procedures, which need to be developed in close cooperation between industry, the standardisation organisations and the European Commission, can help to accelerate these processes.

## **5 Standardisation in the international context**

Electrical and information technology products are used worldwide and are global goods. We therefore advocate open markets, according to the guiding principle: "One test, one standard, accepted everywhere". International cooperation is the key to this, and the international standardisation organisations ISO and IEC are the relevant organisations.

This requires an intensified dialogue with China as China's approach in the international system and the simultaneous support of national standardisation is becoming increasingly apparent. The USA's own standardisation world is also hindering international trade.

The German industry needs international standards in which Europe's requirements and positions are sufficiently reflected. The international and European standardisation organisations should therefore be the preferred place where standards, and especially horizontal ICT standards, are developed. Broad European consensus and speed should be ensured in this process. This will enable Europe to build a strong competitive position. The European standardisation system must continue to be embedded in the international standardisation system of ISO and IEC.

German and European policy should promote the NLF model and the use of international standards around the world.

In international negotiations, there must be no general mutual recognition of standards, but there must be recognition of test results based on common standards.

If it is not possible to strengthen international standardisation, corporate involvement in relevant national standardisation systems (e.g. in China) must also be funded (see Section 6).

## **6 Increasing the attractiveness of becoming involved in standardisation**

We recognise that the involvement of German and European companies in standardisation has been steadily decreasing over the recent years, while the involvement of organisations from other regions of the world is clearly increasing. Standardisation is increasingly becoming a strategic economic policy instrument for these countries. Countermeasures are therefore required from industry, standardisation organisations and politics:

- Create awareness: Standardisation is an element of the innovation process which must be tackled at an early stage, e.g. in product development. Awareness of the strategic importance of standardisation must be raised, e.g. through appropriate events organised by industry and standardisation organisations.
- Education: Attracting talent in industry to the subject of standardisation requires early engagement with the standardisation processes and their relevance for society and economy. The inclusion of standardisation in university curricula should be considered for this purpose.
- Funding: Standardisation comes along with considerable costs. At the same time, companies involved in standardisation contribute to the national economy that goes far beyond their individual benefit. Current funding programmes do not go far enough in this respect. We call for a tax allowance for companies that are actively involved in standardisation (national, European, international or in relevant markets). This could be supplemented by funding of standardisation in projects which contribute to the implementation of innovations.

## **ZVEI: Electro and Digital Industry Association**

The ZVEI promotes the industry's joint economic, technological and environmental policy interests on a national, European and global level.

The sector has round about 866,000 employees in Germany plus 777,000 employees all over the world. In 2020 the turnover was Euro 182 billion.

The electro and digital industry is the most innovative industry sector in Germany. One-third of the industries sales are based on new products. Every third innovation in Germany's manufacturing sector stems from solutions of this sector. More than 20 percent of all industrial R+D spending comes from this industry. Every year, the industry spends 20 billion euros on R+D, more than 6 billion euros on investments and two billion euros on training and further education.

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