



ANEC2002/ENV/

ANEC / EEB Position Paper on CEN Environmental Helpdesk (EHD)

Introduction

The Environmental Helpdesk of the European standardisation institution CEN was established in September 1999. Its major purpose is to review draft standards with respect to their environmental implications and to submit proposals to the relevant Technical Committees (TCs) and Working Groups (WGs). In addition, it should assist standardisation groups upon request in addressing environmental concerns. At present, the EHD consists of one officer who is part of the CEN Management Centre. There are efforts to raise additional funding from the Commission and some Member States.

In the past, ANEC / EEB had a lot of sympathy for an institutionalised form of incorporating environmental aspects in product standards and supported the establishment of the EHD. Nevertheless, the institution has until now fallen short of our expectations. Our concerns are summarised as follows:

Critical Review of the Functioning of the EHD

- In a number of cases, the contribution of the EHD consisted in the mere proposal to incorporate informative references to European legislation or non-normative recommendations into the text of a standard. These recommendations were mainly of a general nature. For instance, it was suggested including a "note" in the standard on remote control systems recommending "to the effect that flame retardants are chosen, which are considered safe regarding environment, health and safety". Another example relates to the proposal to incorporate a "note" in the standard regarding drinking equipment for children in which it is recommended to reduce certain chemicals "to the lowest practical level". Neither the first nor the second recommendation does change the essence of the standard because additional notes or other informative elements are

irrelevant in normative terms. In addition, the wording of both recommendations is too vague to be of use in practical terms. Considering the poor quality of many comments, one is under the impression that the comments are often based on ad-hoc consultations. Even if the limited resources are taken into account the output is not convincing.

- The mission statement the EHD mentions "awareness raising" for environmental issues as the main objective. Apparently, there is the assumption that industry experts (most of the standardisers come from industry) attending TCs and WGs have a lack of knowledge in the environmental field. According to our experience, however, the reluctant attitude of industry is rather linked to commercial interests than to the lack of awareness. Moreover, the incorporation of environmental aspects in standards is not an end in itself. If only a low level of environmental performance is achieved, the exercise as such is superfluous or even counterproductive as the standardisation activities in the field of packaging and the environment have recently shown.
- The EHD is limited to standardisation work in progress. It may submit comments to work items before and during the public enquiry. In other words the EHD is not allowed to ask for the revision of a standard or to ask for the preparation of a new standard (e.g. to complement a safety standard with environmental requirements). Such a concept excludes the development of comprehensive strategies for groups of products or problem areas such as the use of certain chemicals.
- The screening of standards without clear environmental objectives is very resource intensive and leads to the production of comments for the sake of comments whenever environmental aspects are difficult to identify or in cases where they are of little relevance (such as solvents for analytical test methods). Valuable manpower is thus wasted for marginal issues.
- The working procedures of the EHD lack transparency. In principle one person (perhaps two in future) decides which draft standards are selected, which experts are contacted and which comments are finally forwarded to the standardisation committees. Neither standards bodies nor stakeholder organisations have a possibility to intervene. They may nominate individual experts to join an "environmental network" (whose members are not known) at the disposal of the EHD but cannot contribute as organisations. This prevents that stakeholders make use of internal resources or consultants (who are unlikely to give advice free of charge) to elaborate comprehensive positions.
- The reporting of the EHD raises further concerns. The former Newsletter of the EHD contained at least comprehensive summaries of the comments sent to TCs and WGs. Meanwhile there are only short and fragmentary summaries of the contents of the EHD

comments. A long time ago it was even announced that the full text of the comments would be available on the web. This is still pending.

- Technical Committees or Working Groups are free to accept or refuse the proposals from the EHD. According to the EHD report on the pilot phase (1999-2001), 96 drafts were reviewed and 71 comments were elaborated. Only in 21 cases, the EHD received a response (positive or negative). The editions of the EHD Newsletter following the pilot phase report mention few reactions from the TCs concerned. Regrettably, there is no comprehensive description of the concrete achievements and of the concrete amendments of the normative texts put forward by the EHD. It is therefore difficult to assess the impact of the EHD and to judge whether any significant change in a standard has resulted as a consequence of their intervention. The available information suggests that the impact of the EHD is minor. It seems unlikely that this is to change in future whilst the current setup is maintained.

ANEC / EEB proposals for Change

- The current focus on reviewing draft standards should be complemented by an approach that emphasises the identification of environmental targets. After having defined a number of priority areas for sectors, product groups and environmental problems, an environmental programme should be established based on concrete goals (including targets, limits and deadlines) and on multi-stakeholder consultation. As a second step, those standards that need to be adapted or developed have to be identified. The role of the EHD would be to organise the process. SABE would decide on the final recommendations and EHD would help to implement them.
- Consequently, the existing draft standards monitoring programme of EHD would have to be restricted to concentrate on important issues.
- Instead of spending additional funding on new staff, funds should be made available for gaining access to expertise and know-how in order to improve the output. The network of environmental experts may be useful to get a hint, but high-level expertise is typically not free of charge. The integration of clear, normative and verifiable requirements has to be the priority.
- To achieve a high level of environmental protection should become a major part of the EHD mission statement and the terms of reference – an objective to which CEN in its entirety should sign up rather than to strive for "awareness raising".



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- It should be the primary task of the EHD to identify environmental problems in standards and to make this information available to stakeholders, thus enabling them to intervene via the EHD or directly to the relevant committees. The possibility that the EHD makes recommendations itself should not be ruled out, but it would be more important to ensure stakeholder discussion by providing the relevant information in due time, preferably at the beginning of the public enquiry at the latest. The EHD would then collect the stakeholders input and publish its conclusions as well as the input received. In addition, the EHD should make the draft standards available upon request. Equally, the timing (deadlines, stages etc.) should be indicated to facilitate timely interventions.
- All steps of the procedure have to be transparent and all documents should be available on the Internet. This concerns the initially produced document containing the environmental aspects/problems, the received stakeholder positions and the full text of the EHD final comments. Thus the EHD would change from an institution operating behind closed doors into an open discussion platform.
- The system shall not be completely voluntary. The regular review should not only cover the EHD activities but also the environmental quality of standards under investigation. The review should be done by an external consultant and should result in concrete recommendations regarding the environmental provisions of the standards as the basis for binding decisions taken by the senior management of CEN.

Conclusion

ANEC / EEB acknowledge and support the initial intention behind the setting up of the EHD. However, the mode of operation as well as its output and impact of the CEN Environmental Helpdesk give reason for concerns. Due to shortcomings as regards the underlying concept, the EHD seems to add little to the system and, in particular, fails to achieve a "greening" of standards. On the basis of the proposals made above, ANEC / EEB call upon the Commission and Member States not to provide financial support unless these changes have been made.