

3rd European Conference on standardization, testing and certification – Safer products for competitive workplaces



Cracow, Poland, 11 – 12 September 2008

**EUROSHNET “CRACOW MEMORANDUM”
Standardisation for Safe Products**

The Memorandum

The current CEN standardisation and CE certification processes, although not perfect, have proved very useful and have – generally speaking – enhanced the safety level of the products placed on the EU market to a significant extent. Substantial progress is still possible by which the system could be improved and a drift avoided in the safety level of CE-marked products that would be detrimental to the safety and health of their users. The necessary structures and procedures are already in place; they must however now be given new impetus by the laying down of reasonable targets for progress and indicators by which the achievement of these targets can be assessed. This has the potential to reinforce the reputation and influence of EN standards and the New Approach.

This Memorandum reflects the views of European occupational safety and health experts active in standardisation, testing, certification and related research. It deals with possible improvements to the preparation and use of standards in support of New Approach directives which make reference to standards as one means of providing a presumption of conformity to the relevant Essential Health and Safety Requirements (EHSRs) of these directives.

This Memorandum is not a consensus document of all experts registered with EUROSHNET, the European network of OSH experts active in standardisation, testing and certification and related research. However, many aspects of the document have been discussed on EUROSHNET and many of the views expressed by EUROSHNET participants have been taken into account.

The final version of the Memorandum has been accepted by the EUROSHNET Steering Committee. The latter recommends that the Memorandum be used as a basis for further political action at national, European and international levels.

Statements and Proposals

Statement 1 Harmonised European Standards must constitute a reliable technical reference for all stakeholders and must support legislation in a consistent manner, without contradictions, in order to contribute to fairness of competition and to the high level of safety called for by the EU Treaty.

Proposal 1.1 All stakeholders and decision-makers in standardisation should make a concerted effort to ensure that the unanimously accepted principles of standardisation, such as transparency of the system, comprehensibility and coherence of the standards, and balanced participation of all relevant stakeholders, are implemented in practice.

Proposal 1.2 CEN/CENELEC should enforce the existing policy for quality assessment of harmonised European standards (quality of the language, consistency, equivalence of the translations, quality of terminology) and adapt it, where necessary, to the needs of SMEs.

Proposal 1.3 Harmonised European Standards should cover all essential health and safety requirements (EHSRs) that are applicable to the products concerned, either directly, or by reference to other existing harmonised standards covering these essential requirements.

Proposal 1.4 The standardisation mandates issued by the European Commission to CEN/CENELEC should contain an emphatic request that the standards that are candidates for harmonisation should cover all essential requirements applicable to the products concerned. Should it not be possible to cover all essential requirements, whether owing to lack of expertise, knowledge or consensus, harmonised European standards should state in a transparent manner which EHSRs are covered by the standard and which are not.

Proposal 1.5 CEN/CENELEC should actively support the established principle according to which the CEN/CENELEC consultants systematically review coverage of the essential requirements in the standards. CEN/CENELEC may do so for example by coordinating the consultants' work and providing them with appropriate information and training.

Statement 2 Harmonised European standards should reflect the current state of the art and correspond to the highest level of safety and health that can reasonably be expected from a product.

Proposal 2.1 In order to reach this goal, harmonised European standards should be regularly updated to take account of practical experience from the field and the permanent evolution of the state of the art. Methods for triggering and processing feedback from the field should be established. Networks such as EUROSHNET are valuable tools for this purpose.

Proposal 2.2 Where testing methods are provided in harmonised standards, the standards concerned should contain specifications allowing manufacturers and testing laboratories to assess the actual performance of the products objectively with respect to safety and health and to deliver reliable results.

Statement 3 At European level, the adoption of ISO and IEC standards whenever possible is actively encouraged by CEN and CENELEC. In this context, a major challenge is to preserve the high level of safety and health that is expected of harmonised European standards supporting directives under Article 95 of the EU Treaty.

Proposal 3.1 European OSH experts active in international standardisation work should seek to develop standards that achieve a safety level consistent with the EU Directives.

Proposal 3.2 European OSH experts active in standardisation should seek to network with their colleagues from other Member States of the EU in order to harmonise their points of view and where necessary to support common positions jointly at international level. One means for networking is participation in EUROSHNET.

Proposal 3.3 The OSH institutions possess considerable capacity and legitimacy to influence relevant decision-makers in European and international organisations. They should exert such influence by making concrete and objective contributions and addressing decision-makers at the appropriate level.

Proposal 3.4 Standardisation bodies should develop schemes to increase the recognition of the work carried out by experts drafting standards at national, European and international level.

Proposal 3.5 Requirements placed upon products on the one hand and upon their installation and/or use in the field on the other should be dealt with separately in the form of modular standards, in order to simplify the adoption of international standards in Europe.

Statement 4 Efforts should be made to upgrade the system of Notified Bodies to a high-quality system. The outcome of the activities of the Notified Bodies and their Coordination groups is relevant for improvements to product safety in Europe.*

Proposal 4.1 Strengthening the status of the Coordination of Notified Bodies and requiring the active participation of notified bodies would support the development of more rigorous conformity assessment practices which respect all applicable provisions of the New Approach directives and enhance the credibility of CE marking. The European Coordination should develop a global progress scheme based upon a code of good practice, inter-laboratory testing, certification campaigns etc.

Proposal 4.2 The accreditation of notified bodies and surveillance of their work are key elements of a high-quality system. The competence of notified bodies should be considered more closely.

Proposal 4.3 National authorities do not always possess the necessary technical competence to carry out technical inspections within the framework of market surveillance. They should call upon experts, competent external laboratories, and more particularly notified bodies, provided these parties were not involved in the initial assessment of the product.

Proposal 4.4 Recommendations for Use from the Coordination Groups of notified bodies are helpful as a rapid instrument for consensus-building. They are especially needed where deficits or faults exist in standards. Standing Committees should not delay their comments on Recommendations for Use, since negative comments could influence existing type-examination certificates. The Coordination Groups should forward new Recommendations for Use, in the form of feedback from the field, to the relevant standardisation bodies.

Proposal 4.5 The European Coordination of Notified Bodies can conduct its coordination work only for products undergoing an EC type-examination procedure. An incentive should exist to open up the European Coordination to the area in which type examination is not required, since most testing and certification bodies have a wider field of expertise that should be used for improving product safety in Europe. Recommendations for Use could also be produced for product groups which are not undergoing a mandatory EC type-examination procedure.

* In this context, the “Decision of the European Parliament and the Council on a common framework for the marketing of products” (Decision No 768/2008/EC) is very much welcomed.

Statement 5 The development of high-quality standards requires scientifically robust knowledge as an objective basis for negotiations between interested parties. Furthermore, standardisation can be a very effective means for the exploitation of OSH research or study results and can thus contribute to innovation and competitiveness, which are major goals of the European strategy, as expressed in the communication of the European Commission.**

Proposal 5.1 The European OSH research organisations should enforce policies assuring the effectiveness of the interface between researchers and the standardisation system, and should systematically make collaborative use of standardisation and research/studies.

Proposal 5.2 The European Commission and European standardisation bodies should provide a user-friendly and transparent financing system for research in support of the development of harmonised standards.

Proposal 5.3 European OSH organisations should intensify their research/studies in relation to standardisation, certification and testing, particularly in the fields of ergonomics and emissions.

Proposal 5.4 EUROSHNET should be used to improve mutual awareness and integration between the research and standardisation communities by assisting researchers in taking standardisation into account when planning their research programme and exploiting their results through standards.

Proposal 5.5 EUROSHNET should be used to promote the carrying out of common research projects on priority topics, and to stimulate and facilitate collaboration and the creation of research consortia.

Statement 6 EUROSHNET is a communication and consensus-building platform, conceived as an actor in European OSH policy in the field of standardisation, testing, certification and related research.

Proposal 6.1 EUROSHNET should be made a recognised partner of the decision-makers at EU level on OSH issues related to standardisation, testing, certification and related research.

Proposal 6.2 EUROSHNET should be used to promote the improvement of standardisation work with respect to OSH more actively at the European Commission, CEN and at other European organisations.

** Communication from the Commission to the Council, the European Parliament and the European economic and social committee “towards an increased contribution from standardisation to innovation in Europe” (COM/2008/0133 final).