Brussels, 3 August 2021

Response to the public consultation on Roadmap Standardisation Strategy

Introduction

The Alliance for Internet of Things Innovation (AIOTI) welcomes the Commission's intention to discuss standardisation, as a part of the industrial strategy update.

AIOTI is strongly engage since 2015 in standardisation activities in Europe supporting them by identifying gaps, provide relation between topics such IoT and 5G, promote concepts such as high-level architecture and semantic interoperability.

Our deliverables and reports could be found here.

General

The Regulation 1025/2012 sets the legal framework for the EU to use voluntary European standardization as a recognized policy tool in support of Union legislation and policies for the products and for the services. Such harmonized standards are being used to avoid over-regulation, such that legislation can concentrate only on the essential requirements, while technical details can be left to technical specification standards.

In the context of the above as well as the New Legislative Framework (NLF) approach, the European Commission (EC) is confined to the generally worded legal requirements and avoid going into technical details.

The EC reserves the right – Regulation 768/2008, art. R9 – to object to a harmonized standard, should it not entirely satisfy the requirements which it covers, set out in a given legislation.

Furthermore, the above EU approach introduces the notion of "technical specifications" being developed outside of the European standardization system. European standardization is a key instrument for consolidating the EU Single Market, supporting the competitiveness of European industry in a global market, harmonizing conflicting national standards and facilitating cross-border trade in a less intrusive manner than technical regulations. Standards provide a common understanding among businesses, other stakeholders and public authorities on the commonly recognized state of the art and they are frequently reviewed and revised.

Reiterating the recent joint non-paper on harmonized standards being distributed at the Competitiveness Council on 27 May, calling the EC to find the right balance to improve the system of harmonized standards, and provide the right flexibility as to preserve state-of-the-art standards.

An approach of realising this request is to engage into a constructive dialogue with industry stakeholders, aiming at resolving the functional problems of ESS (European Standardisation System).

In that context clarification should be provided on what EC means by the term like-minded trading partners, and what properties and criteria thereof are understood as relevant. Strategic partnerships should be fostered with all European and global contributing partners and inclusiveness in standards shall be maintained, as the ability to deliver innovations and compete in global economy requires cooperation and not protectionism. Digital sovereignty must not disconnect Europe from the globalised economy and co-creation of value processes.

We welcome the emphasis on addressing standards-related education, skills and expertise, both in the public and private sector, and look forward to see budget allocated and plans made to cater for this.

Feedback to the questions from the Roadmap

Is European standardisation system fit for purpose to support European strategic interests?

We believe the answer is Yes, as the ESS has proven its success over the past years and decades, that does not however mean that it cannot be improved and made more efficient.

The process of Standardisation requests needs to become more flexible and allow for early participation of the ESOs in the process in order to converge efficiently to a version that can be realistically addressed and fulfilled by the ESOs (e.g. do not restrict to YES/NO answer on a proposed text). Too prescriptive approach to SRs shall be avoided.

Active participation of the EC in standardisation is needed from the beginning to the end, as to provide clarifications and policy support that will ameliorate the understanding of experts in relation to the scope, the intention of the lawmakers and desired outcome; it should however remain respectful of the standardization development process and its governing principles. This includes enabling better interactions between HAS consultants and the ESO community in the development process of Harmonized Standards, so that potential issues affecting citation in the Official Journal of the EU (OJEU) can be anticipated and addressed earlier.

Better coordination among ESOs and international and other SDO organizations need to be catered for. To this end sectoral EU agencies take initiatives and are already working with ESOs (e.g. ENISA) and can provide practices to be implemented in other areas. Still, institutional arrangements and regulatory framework would be a better tool, as they would provide a unified approach.

How the EU can leverage and promote global leadership in standards-setting?

By maintaining and being even more inclusive and use the whole spectra of resources and expertise that European and international partners can provide.

By aiming to influence international standards, and aligning European and international standards and catering for European standards to become even more widely adopted internationally. Industry that is involved in collaborative research and innovation plays a crucial role in standards setting for development and implementation of new technologies. It is important for the EU to establish its leadership position with the inclusion of global companies for research and innovation of new technologies such as 6G. This would ensure that the EU leads development of international, globally-recognized, common standards into the Digital Decade.

By being inclusive for all partners, including international partners, being respectful of the rules governing international standardization.

By encouraging and incentivizing innovative SMEs to contribute in standardization. Standards help businesses of any size and sector reduce costs, increase productivity and access new markets; Small and medium-sized enterprises (SMEs) are the backbone of Europe's economy as they represent 99% of all businesses in the EU. Supporting European SMEs' more active participation and collaboration with other European or International stakeholders, would allow for a more dynamic presence of the European industry but also encourage innovation and growth.

By more strongly encouraging and enabling EC funded projects to contribute in standardization. This will more greatly support the collaborative work accomplished in these EU funded projects and will increase the impact of the obtained results in standardisation.

Are changes in governance and working methods required to improve the performance of the European standardisation system?

Improvements in ESS European standardisation system (ESS) does not need or require a new governance as current one and abiding NLF has successfully catered for ESS success so far. Focus can be put more on identifying the real issues and finding solutions to solve those specific issues and constantly keep improving the working methods and avoiding unnecessary fragmentation. However, the creation of incentives for the ESS stakeholders' participation in the ESOs works will benefit the quality and inclusiveness of the standards produced avoiding the proliferation of alternative industry initiatives that will lead to fragmentation and twisting toward supporting specific business interests.

NLF has provided an efficient enabling environment for the production of harmonized standards (hENs), and a solid process that produced great achievements. The model is far from perfect, yet a fine-tuning process would increase the efficiency of the system as to effectively respond to the modern challenges posed by the ever-evolving pace of technological progress.

Conclusion

The evolution of the international trading system and its impacts on the global economy are uncertain. Even as the concepts of globalization and multilateralism are increasingly challenged, the interdependence of global supply chains remains strong and essential.

The economic growth is not measured by who controls standards, but the investment in human capital or R&D. Standardization is a platform of cooperation to build a repeatable, harmonised, agreed and documented way of doing something, that allows production to be marketed globally without barriers of any technical manner; but only should the capacity be in place. The right investments do the rest and produce economic growth.

European Standardization should continue being supportive of the European policy and market harmonization as a part of a global harmonization of products and services.

About AIOTI

AIOTI is the multi-stakeholder platform for stimulating IoT Innovation in Europe, bringing together small and large companies, start-ups and scale-ups, academia, policy makers and end-users and representatives of society in an end-to-end approach. We work with partners in a global context. We strive to leverage, share and promote best practices in the IoT ecosystems, be a one-stop point of information on all relevant aspects of IoT Innovation to its members while proactively addressing key issues and roadblocks for economic growth, acceptance and adoption of IoT Innovation in society.

AIOTI's contribution goes beyond technology and addresses horizontal elements across application domains, such as matchmaking and stimulating cooperation in IoT ecosystems, creating joint research roadmaps, driving convergence of standards and interoperability and defining policies. We also put them in practice in vertical application domains with societal and economic relevance.

AIOTI is a partner for the European Commission on IoT policies and stimulus programs, helping to identifying and removing obstacles and fast learning, deployment and replication of IoT Innovation in Real Scale Experimentation in Europe from a global perspective.

AIOTI is a member driven organisation with equal rights for all members, striving for a well-balanced representation from all stakeholders in IoT and recognizing the different needs and capabilities. Our members believe that we are the most relevant platform for connecting to the European IoT Innovation ecosystems in general and the best platform to find partners for Real Scale Experimentation.