

SBS Analysis: Guide 17 Snapshot



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SBS in Brief

Small Business Standards (SBS) is a European non-profit association established in 2013 with the support of the European Commission. SBS is exclusively devoted to representing and defending SME interests in the standardisation system at European and international levels.

Its 22 members are national and European sectoral and inter-professional associations representing SMEs all over Europe. The membership is thus open to all associations matching these criteria.

SBS was created to meet the European Union's aspiration to make the standardisation system as inclusive, transparent and open as possible, by strengthening the participation of "weak" stakeholders such as SMEs.

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1. Introduction

The work on a guidance document aimed at defining a reference to take into account the needs of micro, small and medium-sized enterprises (SMEs) in standard writing groups has started on the 19th November 2008 within the CEN-CENELEC Technical Board Working Group 208 “Guidance on SME needs”, the secretariat of which was held by Normapme.

The result of this work has led to the publication of the document “*CEN/CENELEC Guide 17 – Guidance for writing standards taking into account micro, small and medium-sized enterprises (SMEs) needs*” on the 16th June 2010. The objective of this document is to provide orientation, advice and recommendations to standard writers on how to take into account SME needs.

On the 17th April 2013, ISO has published a guide based on CEN-CENELEC Guide 17. This Guidance document was prepared by a Task Force of the ISO Technical Management Board and is titled “*Guidance for writing standards taking into account micro, small and medium sized enterprises (SMEs) needs*”¹. CEN/CENELEC Guide 17², today available in 22 languages, proposes a comprehensive approach to take into account the needs of SMEs during the entire standard drafting process: from the initial information on the preparation of new work items, to the development of the content of standards, together with their structure, presentation and final review. The Guide, although serving as general orientation for standard writers and not being legally binding, highlights potential issues, such as the evaluation of costs of implementation of standards or linguistic aspects, which may affect the ability of SMEs to adapt to European standards for the manufacture of their products or the type of services provided.

One essential angle of SBS annual strategy is the promotion of Guide 17, using different tools to increase its visibility. Aiming at this objective, SBS has been nominated at the end of 2014 as leader of ‘Apply Guide 17’ project within CEN-CENELEC SME Working Group (WG). In the framework of SBS role in the SME CEN-CENELEC WG, whose scopes include a close monitoring of the actions targeting SMEs in the European standardisation arena ensuring their implementation and follow-up, SBS members have expressed an interest in getting a concrete snapshot on the status of the implementation of Guide 17.

This report is an additional action, on the SBS members, which aim more at putting in exergue result concrete difficulties at technical level, to integrate the recommendations of the Guide within drafting phases of standards. Indeed, SBS considers its active participation in the SME WG of fundamental importance to enhance the scope of its activities, which include raising awareness about standardization, ensuring better access to standards for SMEs and increasing their participation during the entire standardisation process.

¹ Online available at: <http://www.iso.org/iso/PUB100342.pdf>

² Online available at: <http://sbs-sme.eu/sme-involvement/best-practices>

2. Objective of the study

This research exercise is conducted in the framework of Work Package 4 of SBS Work Programme for 2015. The objective of this activity is to promote European Standardisation Organisations (ESOs) and National Standardisation Organisations (NSOs) measures and best practices for SMEs by stimulating further adoption and concrete implementation of those measures in the ESOs and NSOs.

In specific, the present exercise aims at assessing standards with regard to their adequacy with the principles of CEN-CENELEC Guide 17, providing support to SBS to better position in the standardisation arena the principles of this Guide, considered as up today pertinent by SMEs organisations. This action is integrated within SBS overall strategy of promoting Guide 17, whose contents provide guidance to drafters of European Standards, ensuring inclusiveness of SMEs and representation of their needs. Indeed, additional activities are foreseen in 2015 for the enhancement of awareness on the contents of this important Guide, among which a project, led by SBS and CEN-CENELEC, oriented to the promotion of Guide 17 in National Bodies and Technical committees.

The above mentioned activities are considered strategic also in relation to the involvement of SBS within the workings of the CEN-CENELEC SME Working Group, which aims at ensuring a closer monitoring of the actions targeting SMEs in the European standardisation arena and a follow-up of their implementation. In this framework, the item related to the assessment of the adequacy of certain key standards with Guide 17 constitutes a necessary element to provide stakeholders with a qualitative evaluation of the “reality check” related to its implementation.

The presence of SMEs is significant in the majority of sectors, as they represent over 99% of enterprises in Europe. 92% of enterprises have less than 10 employees and limited resources[1]. Thus, it is of primary importance to raise awareness on their needs in standardisation and ensure the compliance with their positions in case of non-representation of SMEs in the standardisation processes. Given the low number of assessed standards (9) in comparison to number of existing standards worldwide, it has to be underlined that the research exercise does not claim to have any statistical significance. Rather, the objective is to provide a qualitative assessment regarding the implementation of the Guide 17.

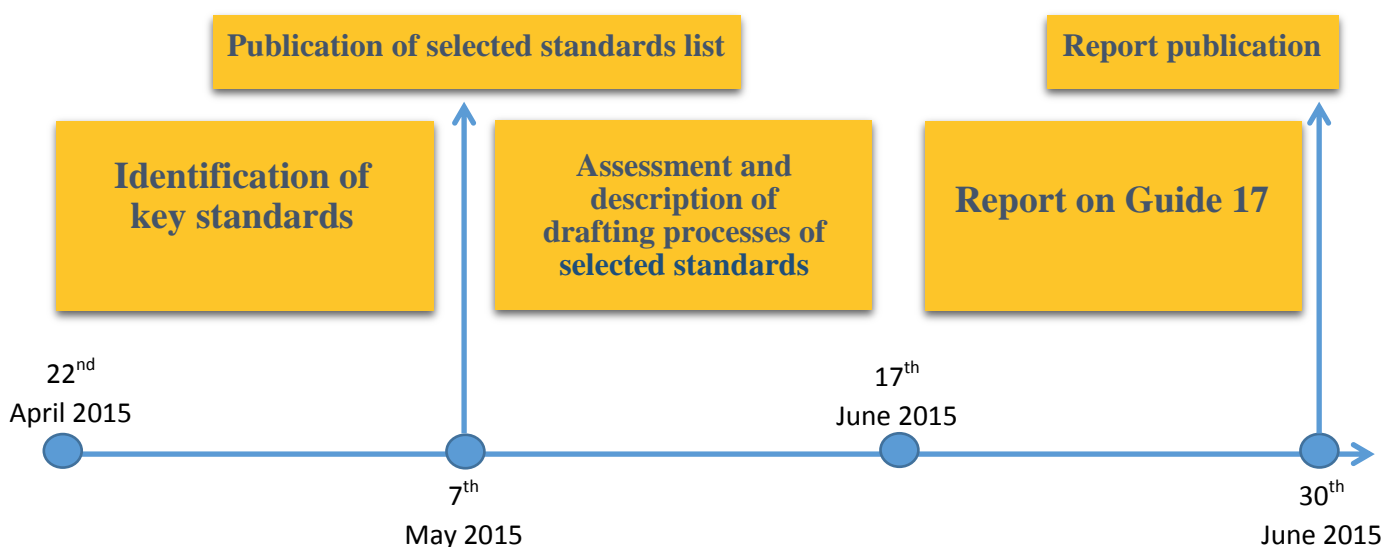
3. Methodology

With its demand-driven policy, SBS responds to SME needs through participation in Technical Committees (TCs). For 2015, SBS has appointed experts to represent the interests of SMEs in 50 Technical Committees' Working Groups (WG) of European and International Standardisation Organisations TCs, covering 19 different sectors in which standards are crucial for SMEs³.

CEN-CENELEC Guide 17 is relevant to all stakeholders involved in the standardisation processes such as experts, standard writers in TCs/WGs and members of national mirror committees. TCs and WGs are the best place to evaluate if and how to address specific needs of SMEs in their standards. Thus, on 22nd April 2015, SBS has launched the consultation among its members to identify key standards for the assessment exercise. The second phase of the work has started on 7th May, following the publication of the proposed list of standards to be assessed. In this context, members and experts proposing the standards to be assessed, have been asked to describe in details the drafting processes, occurred within the respective TCs, of the selected standards with regard to Guide 17 principles. The description of drafting process of specific standards is based on the Guide checklist, i.e. a table presenting recommendations of CEN-CENELEC Guide 17 in form of 22 questions divided in 5 categories:

1. Preparation of the New Work Item;
2. Preparation of a standard
3. Development of content;
4. Structure and presentation of the content
5. Final review.

The analysis of SBS experts' replies constitutes the core element of this document, a research exercise to present an overview of the assessment of standards, together with the positioning of SBS as an Annex III Organisation to all key stakeholders.



³ An overview of the 19 different sectors covered by SBS is online available at <http://sbs-sme.eu/sectors>

4. Selected standards

On the basis of the manifestation of interests of its members, who came up with proposals on the standards to assess for the research exercise, SBS has selected standards in four categories of products: safety products, construction products and cosmetic products.

The standards selected for the assessment with regard to their compliance with the principles of CEN-CENELEC Guide 17 are the following:

• Manufacture of safety products:

- ISO CD 17420-1 Respiratory protective devices -- Performance requirements -- Part 1: Supplied breathable gas devices; and
- ISO CD 17420-2 Respiratory protective devices -- Performance requirements -- Part 2: Filtering devices,

whose drafting is discussed within ISO/TC 94/SC 15 Respiratory protective devices.

• Construction:

Windows and doors

- EN 14351-2 Windows and doors - Product standard, performance characteristics Part 2: Internal pedestrian door-sets without resistance to fire and/or smoke leakage characteristics

whose drafting is discussed within CEN/TC 33 WG 1.

Chimneys

- prEN 16475-6, Accessories - Part 6: Access components - Requirements and test methods; and
- prEN 13216-1 rev, Chimneys - Test methods for system chimneys - Part 1: General test methods,

whose drafting is discussed within CEN/TC 166 WG 1.

• Cosmetic:

- ISO 24445 - Sun protection test methods — In-vitro determination of SPF (Sun Protection factor) based on transmittance;
- prEN 16521 - Cosmetics - Analytical methods - GC/MS method for the identification and assay of 12 phthalates in cosmetic samples ready for analytical injection;
- EN ISO 17516 - Cosmetics. Microbiology. Microbiological limits; and
- WI00392023: HPLC/UV method for the identification and assay of Hydroquinone, ethers of hydroquinone and corticoids in cosmetic products.

whose drafting is discussed within CEN/TC 392.

5. Data analysis

Guide 17 being a working document which concretely provides guidance to standard writers, it presents at page 14 all its principles and recommendations for the entire drafting process in form of a checklist (below attached).

For this research exercise, SBS experts replied to the 22 questions of the checklist in order to assess the consideration of SME needs during drafting of a new standard or the revision of an existing one.

Guide checklist

Preparation of the New Work Item	Preparation of a standard	Development of the content	Structure and presentation of the content	Final review
<input type="checkbox"/> (5.2.1) Have you checked the SME relevance of the standard? <input type="checkbox"/> (5.2.2) Have you checked among all the stakeholders if there are special SMEs needs? <input type="checkbox"/> (5.2.2) Did you evaluate if SMEs are among the target groups?	<input type="checkbox"/> (5.3.1) Did you evaluate the costs of investment (technology, equipment, testing)? <input type="checkbox"/> (5.3.1) Did you evaluate the cost of training (staff)? <input type="checkbox"/> (5.3.1) Did you evaluate the costs of implementation? <input type="checkbox"/> (5.3.2) Have you verified that all elements are available?	<input type="checkbox"/> (5.4.1) If the performance approach is used, is it understandable? <input type="checkbox"/> (5.4.2) Have you used descriptive explanations? <input type="checkbox"/> (5.4.3) Is the standard precise and complete within its scope? <input type="checkbox"/> (5.4.4) Did you avoid strict testing regimes? <input type="checkbox"/> (5.4.4) Did you evaluate the cost of testing? <input type="checkbox"/> (5.4.5) Have you identified simple and cost-effective ways of verifying conformity with the requirements?	<input type="checkbox"/> (5.5.1) Is the standard as short as possible? <input type="checkbox"/> (5.5.1) If the standard is long, did you evaluate the possibility of dividing it in shorter standards? <input type="checkbox"/> (5.5.2) Is the structure of the standard easy to follow? <input type="checkbox"/> (5.5.3) Have you included supportive graphs, charts, etc (when possible)? <input type="checkbox"/> (5.5.4) Have you used clear language understandable by all expected standard users? <input type="checkbox"/> (5.5.5) Did you minimise the number of referenced standards? <input type="checkbox"/> (5.5.6) Did you provide clear information on the changes from the previous versions of the standard?	<input type="checkbox"/> (5.6.1) Have you suggested a transition period reflecting the implications of changes? <input type="checkbox"/> (5.6.2) Have you made the evaluation on the need for an implementation manual?

5.1. Preparation of the New Work Item

➤ Q1: Have you checked the SME relevance of the standard?

According to the analysis of the drafting processes of selected standards, it is generally observed that in the preparation phase of a New Work Item, Working Groups and/or Technical Committees of both European and International Standardisation Organisations check well in advance the relevance of the standard for the interests of SMEs.

At CEN level, the document used for “Programme of Work – Adoption or Activation of a New (Preliminary) Work Item” states that it is necessary to confirm “that the new work item corresponds to real market needs”. This gives the possibility to experts representing SMEs to put forward their positions in occasion of the CEN/TC inquiry, using CEN Form A, “New working item proposal” (NWIP), including – if needed – SMEs among that relevant affected stakeholder categories and describing how they could be possibly affected by the proposal.

At ISO level, this research exercise notes episodic events in which SMEs needs, both as manufacturers and end-users, have not been taken into account although they had been explicitly and formally declared.

➤ **Q2: Have you checked among all the stakeholders if there are special SMEs needs?**

This research exercise highlights that when it is already proven that SMEs have been involved in the production and/or use of a specific product, stakeholders are usually already aware about the special needs required by SMEs.

On the other hand, this study also underlines how, in case of new products whose production and/or use has not already been implemented, special SME needs are usually taken into account at national level by the relevant national standardisation body and/or at the EU level by an appropriate association/organisation, representing also the affected SMEs.

➤ **Q3: Did you evaluate if SMEs are among the target groups?**

The analysis of replies to this question related to the drafting process of selected standards reveals that Working Groups and/or Technical Committees of both European and International Standardisation Organisations do not generally take into account the presence of SMEs among the target groups of a standard. However, SBS experts have noted that in some cases, thanks to the presence of SME representatives in Working Groups and/or Technical Committees, it is assumed that SMEs are included among the target groups of a specific standard.

5.2. Preparation of a standard

➤ **Q4: Did you evaluate the costs of investment (technology, equipment, testing)?**

Most of the replies have highlighted that the costs of investment (technology, equipment, testing) for standards have not been properly evaluated during the drafting process. Indeed, SBS experts have noted that most decisions having an impact on investments (e.g. testing methods) are taken at an early stage without taking properly into account their consequences under an economic perspective. As a result, this practice could make investments unbearable for SMEs.

However, this study registers that the drafting process of the standard on windows and doors has included the evaluation of costs of investment in terms of technology, equipment and testing, in accordance with the interests of SMEs.

➤ **Q5: Did you evaluate the cost of training (staff)?**

With the exception of standard EN 14351-2 – construction sector – whose preparation phase has properly included the evaluation of training (staff) cost in accordance with the needs of SMEs, for all the other standards, these item has not been taken into account during their preparation phase

➤ **Q6: Did you evaluate the costs of implementation?**

From the analysis of replies related to the evaluation, in occasion of the preparation phase of standards, of the costs of implementation, SBS experts have homogeneously noted that this type of cost is not generally assessed at WG/TC level, while SMEs have a clear idea of the possible magnitude of these costs, often not in line with the needs of SMEs.

➤ **Q7 (5.3.2): Have you verified that all elements are available?**

For standards of “traditional” products, SBS experts have noted that all relevant elements are available in the preparation phase of standards. On the other hand, in case of innovative products, it is registered a lack of information about laboratories/tests centres which should be already equipped with all the necessary installations, as well as a lack of knowledge about expected product performances under the new test conditions prescribed by the standards.

5.3. Development of the content

➤ **Q8: If the performance approach is used, is it understandable?**

The analysis of replies related to this question underlines the different approaches used for standards in different standardisation fields. Indeed, for chimneys and related accessories a performance approach is not explicitly used mainly due to the supportive scope of prEN 13216-1 for the definition of material-independent general test methods and to the consideration that for prEN 16475-6 the performance approach would have led to long and complicated testing procedures as well as high cost. On the other hand, the performance approach is used and considered understandable for all the other standards object of this study. In particular, standard ISO CD 17420 is a performance driven standard which gives appropriate examples and explanations for a better understanding.

➤ **Q9: Have you used descriptive explanations?**

Contrasting opinions are registered about the use of descriptive explanations in the standards selected for this analysis. In some cases (i.e. for standards on chimneys and related accessories), descriptive explanations are limited to the introduction section, by simply outlining the field of application and some other indications. On the other hand, other documents (i.e. EN ISO 17516 and WI00392023) are well integrated with explanatory texts to better describe sets of technical conditions. It is also registered, in some cases, the necessity of adding supportive information to enable manufacturers to position their products within a certain category and find easily out which product standard and corresponding supporting standards would be applicable.

➤ **Q10: Is the standard precise and complete within its scope?**

In this case, the collected answers highlight a positive feedback with regard to the precision and completeness of standards within their scopes. SBS experts have generally pointed out the relevance of the contribution of SMEs to achieve such a result. Indeed, SME representatives have actively contributed at TC/WG level in particular aiming at enhancing the scope and shortened the introductory section of standards.

However, it has been registered the necessity to check the precision and completeness of standards within their scopes especially in case of revision of the related standardisation requests (mandates), aiming at being as succinct as possible so that a specific scope can be used also as a summary for bibliographic purposes.

➤ **Q11: Did you avoid strict testing regimes?**

In the safety sector, the selected standards introduce a new and large variety of test regimes and preconditioning of samples and increases five to six folds the duration of testing in respect to the current practice. Similarly, in the standardisation of chimneys and related accessories, not all essential characteristics (technical specifications) can be evaluated avoiding strict testing regimes.

On the other hand, the selected standards of cosmetic products take into account the possibility of avoiding strict testing regimes, in line with the needs and interests of SMEs.

➤ **Q12: Did you evaluate the cost of testing?**

The development of content phase of the selected standards have never registered an appropriate evaluation of costs of testing. Indeed, although in some cases (standardisation of chimneys) this aspect has been considered when drafting prENs, the appropriate actions to evaluate the burden of testing of some product's characteristics have neither been agreed on yet nor carried out.

The standardisation process of respiratory protective devices registers other issues, such as the high investments required for some tests which are possible only in a few laboratories all over the world. This, together with the congestion of those laboratories, will most certainly lead to high cost of testing and certification.

➤ **Q13: Have you identified simple and cost effective ways of verifying conformity with the requirements?**

SME representative have faced diverse situations during the drafting phases of different standards with regard to identification of simple and cost effective ways of verifying conformity of products with the requirements. This is mainly due to the different nature of products. Indeed, for innovative products related to safety of human beings the verification of conformity of products with the requirements is extremely sophisticated and cost effective ways for assessing such conformity (e.g. calculation methods) are rarely available.

On the other hand, for "traditional" products - such as windows and doors, chimneys and related accessories - simple and cost effective ways of verifying conformity with the requirements have been identified. However, it is unfortunate that for some of essential characteristics the simple and cost effective ways to determine the product-type either by

calculation rather than by testing or even by other simplified solutions have not been investigated enough to be accepted and proposed for the drafting of standards.

5.4. Structure and presentation of the content

➤ Q14: Is the standard as short as possible?

SBS experts generally report about the necessity of keeping standards as short as possible. Indeed, although recognising the importance of descriptive parts and explanatory texts, they underline that repetitions have to be avoided, keeping a good balance between the introduction of cross references to general and supportive standards and the use of clear and detailed instructions.

In other cases, e.g. for standards related to respiratory protective devices, relevant information are requirements are divided in three sections covering different aspects of RPDs. Nonetheless, Part 1 and 2 are more than 80 pages. The length and repartition of contents do not improve the comprehension of the standard also due to the variety of products to which the standard itself applies.



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➤ Q15: If the standard is long, did you evaluate the possibility of dividing it in shorter standards?

This study highlights the fact that, for those standards which are considered long, the possibility of dividing them in shorter standards has been generally evaluated as not appropriate. Indeed, the length of selected standards is mainly due to the a number of test methods described, together with the complexity of most of these test methods.

Dividing standards in shorter standards is not always considered as SME friendly practice given the fact that this could cause the necessity of introducing complex cross-referencing to support shorter standards focusing on too specific characteristics of products.

➤ Q16: Is the structure of the standard easy to follow?

The drafting processes of standards on chimneys and related accessories have lead, in general, to standards having a structure which is quite easy to follow. However, this seems to be not in line with the rules given in the CEN Internal Regulation – Part 3: “Rules for the structure and drafting of CEN-CENELEC Publications”. This is mostly the case with informative and normative status of some annexes, as given under the heading of the annexes, which is not correctly referred to or even not referred to at all in the relevant provisions in the main body of draft standards.

While for cosmetic products the structure of selected standards has been overall considered sufficiently easy to follow, in other cases the structure of standards could have benefitted from a different structure, providing relevant information according to the type of product affected by specific requirements and test methods. However, this solution has been considered not always realistic, as it would have led to a complex standard structure made of “Chinese boxes”.

➤ **Q17: Have you included supportive graphs, charts, etc. (when possible)?**

For the selected standards, it has been registered that graphs and charts - whether relevant and whenever possible - have been included in the structure of standards. Due to the nature of these standards, the number of such supportive tools is considered reasonable.

From the analysis of the replies, it emerges also the necessity to include as many figures as possible, especially in the introductory section, providing clear information about the product to which the standard corresponds. For construction products, this solution seems of particular importance given the recent decision of removing CE marking examples from the last template version of the Annex ZA, typical annex of harmonised standards under the Construction Product Regulation (CPR) No 305/2011/EU.

➤ **Q18: Have you used clear language understandable by all expected standard users?**

Contrasting opinions are registered to what concern the use of clear language understandable by all expected standard users. For the drafting of standards related to cosmetic products, it generally observed the use of appropriate language to adequately approach the needs of potential users of those standards.

However, due to complexity of some of the test methods, in some cases assistance from technical staff from testing laboratories seems necessary to support manufacturers with regards to understanding specific standard provisions. Moreover, during the drafting of other standards, such as the EN 14351-2 on windows and doors and ISO CD 17420-1/2 on respiratory protective devices, there is the tendency to still refer to a bureaucratic and/or over-specialised language. Many descriptions seems to be comprehensible only by experts having a scientific background and not user friendly for those who approach the document for the first time.

➤ **Q19: Did you minimise the number of referenced standards?**

For standards such as prEN 16475-6 and ISO CD 17420-1/2, it seems that the arrangement of supporting standards is not friendly to SMEs, as in such standards are given also normative provisions referred to other requirements. SBS experts claim that this kind of arrangement may be reasonable for the drafters of the above mentioned standards, but not so for SMEs. Furthermore, this might also trigger additional problems for standard drafters, with duplication of the same provisions in two different standards, particularly when revisions of such standards are discussed.

On the other hand, for cosmetic products and windows and doors, it seems that manufactures have indeed the possibility of getting relevant information without recurring to

one or more additional standards. However, for construction products in general, SBS experts underlined that standards never mention those simplified procedures applicable to construction product(s) and foreseen by the Construction Product Regulation (CPR).

- **Q20: Did you provide clear information on the changes from the previous versions of the standard?**

All standards are related products to which no appropriate comparison can be made with other preceding standards, with the exception of prEN 13216-1rev on chimneys, whose changes with regard to the previous version of this EN are listed in the foreword.

5.5. Final review

- **Q21: Have you suggested a transition period reflecting the implications of changes?**

For those standards which cannot be compared with previous ones, as they are related to the standardisation of new products, this question is not applicable. For example, ISO 17420 being a new standard, no transition is necessary within ISO. However, with respect to existing standards, the ISO draft standards introduce in general a set of completely new requirements, forcing companies to buy new equipment and change the work organisation as well as re-train staff, thus making it necessary to consider a very long transition period.

For prEN 13216-1rev on chimneys, this question has not been considered yet among drafters during the drafting process. However, it is reasonable to assume that default transitional periods will be foreseen, helping the manufacturer in adapting the production.

- **Q22: Have you made the evaluation on the need for an implementation manual?**

With the exception of the drafting process of prEN 16475, for all the other standards object of this study no evaluation has been made on the need for an implementation manual. However, even in the case of prEN 16475, a supportive manual useful in particular for SMEs manufacturers has not been developed yet.

6. Discussion

This research exercise, although having no statistical significance given the incomparable number of existing standards with the standards object of this study, is useful to highlight some of the issues and burdens that conflict with the position of SMEs with regard to the drafting of new standards and revision of existing standards. At the same time, the analysis of replies to the 22 questions included in the Guide 17 checklist can provide a qualitative impression on concrete actions which prove the positive consideration of the interests of SMEs during the drafting process.

6.1. Preparation of the New Work Item

With regard to the preparation of the New Work Item, this study generally observes that Working Groups and/or Technical Committees of both European and International Standardisation Organisations are aware of the potential relevance of a specific standard for the interests of SMEs. However, it is possible to claim that this analysis focused on drafting activities in TCs and/or WGs where SMEs are well represented by experts and representatives. Thus, it seems necessary to pay high attention in those TCs/WGs where SMEs are poorly represented (or not represented at all) in order to raise awareness of standard writers about the needs of SMEs.

6.2. Preparation of a standard

From the analysis of replies concerning the preparation of selected standards, emerges a worrying tendency not to properly assess costs investment, training and implementation. CEN-CENELEC Guide 17 stresses the need to properly evaluate the costs for implementing the standard *“before introducing provisions or requirements that may not be cost-effective in all situations”*. On the contrary, approaching the draft of a specific standard without considering costs for its implementation as parameter of primary importance could turn costs of investment to be unacceptable for SMEs. As a general rule, it is suggested to evaluate whether the prescriptions outlined in a specific standard can be put into practice without causing disproportionate and/or unnecessary burdens for SMEs.

When discussing about testing methods for specific standards, standards writers are requested to consider the possibility to meet a certain requirement on the market, ensuring the availability of elements such as technology, products, testing equipment and testing laboratories among the others. This research exercise highlights two different situations related to the availability of all elements required by a standard. Indeed, while for traditional products the consolidated experience have led to the nearly complete availability of all the required elements to deal with the standardised product, in case of innovative products, information about laboratories/tests centres already equipped with all the necessary installations for the treatment of products are not always available.

6.3. Performance approach

CEN-CENELEC Guide 17 recommends that, “[...]whenever possible, requirements shall be expressed in terms of performance rather than design or descriptive characteristics”. This

research exercise has highlighted episodic cases in which a performance approach had not been explicitly used due to the supportive scope of standards or to the eventuality that such approach would have led to long and complicated testing procedures as well as high costs. On the other hand, the performance approach is considered understandable for other standards object of this study.

This study also highlights how the necessity for writers of standards to analyse the relevant markets and define clear and comprehensible scopes of standards has been generally taken into account during the phase of development of contents of the selected standards. Indeed, the role of SMEs experts has to be underlined with regard to the achievements of an overall precision and completeness of standards within their scopes. This confirms once more the importance of participation of SME representatives in the standardisation processes, especially during the drafting phase of standards where major decisions affecting the needs of SMEs are proposed and discussed.

It is globally recognised how testing procedures required for compliance with standards requirements constitute often a significant economic burden for SMEs. This study has pointed out on more than one occasion the fact that costs for the implementation of standards have always had a significant impact for SMEs activities. However, experts who have been involved in the drafting phases of standards in the safety sector have encountered problems in defining alternative test regimes and preconditioning of samples to those that had already been established. Nevertheless, where possible, CEN-CENELEC Guide 17 stresses the need for not introducing unnecessary tests and avoiding the eventuality that test performers take advantage of their role to reinforce their monopolistic or dominant position.

In order to allow flexibility in verification of requirements, CEN-CENELEC Guide 17 invites standard writers to take into account alternative methods for the assessment of products. This research exercise registers opposite tendencies to follow the above mentioned principle. Indeed, for innovative products related to safety of human beings the verification of conformity of products with the requirements is extremely sophisticated and cost effective ways of assessing conformity, such as calculation methods, are rarely available. On the other hand, for construction products have been identified simpler and more cost effective ways of verifying conformity with the requirements, in line with the prescriptions of the Construction Product Regulation No 305/2011/EU that foresee in article 17(3) the possibility of providing in harmonised standards less onerous methods to carry out these activities.

6.4. Structure and presentation of the content

SBS experts have generally negatively reported in this study about the success, in occasion of the drafting of selected standards, in keeping standards as short as possible. Indeed it has been noted how long standards discourage potential users from reading them, not only from understanding. As a general rule, SBS experts have noted that repetitions have to be avoided, keeping a good balance between the introduction of cross references to general and supportive standards and the use of clear and detailed instructions.

In line with principles of Guide 17, the necessity of designing a user-friendly standard structure has been generally taken into account during the drafting phases of the selected

standards. For cosmetic products, the structure of selected standards has been overall considered sufficiently easy to follow. In other cases (e.g. for ISO CD 17420-1 and 2), although it was evaluated the possibility of restructuring the standard, this has not been implemented in order not to further complicate the structure of the document. Moreover, SBS experts have also registered episodic cases in which the structure of the standard was neither in line with CEN Internal Regulation on rules for the structure and drafting of CEN-CENELEC publications.

The inclusion of charts, graphs, drawings and clarifying examples of application are overall considered decisive to facilitate the comprehension of a specific standard. Whether relevant, the drafting of selected standards has registered the inclusion of graphs, charts and other supportive tools. However, for construction products the recent decision, validated by the issuing of a new template of the Annex ZA (typical annex of harmonised standards under the Construction Product Regulation (CPR) No 305/2011/EU), has been noted.

CEN-CENELEC Guide 17 recommends attention in adapting the language of standards to potential users, with particular attention to SMEs. Not always SBS experts have observed the use of an appropriate language to adequately approach the needs of SMEs as standard users. Indeed, in the drafting phase of selected standards it has been noted the tendency of referring to a bureaucratic and/or over-specialised language, giving descriptions which seem to be comprehensible only by experts having a technical and scientific preparation. In order to overcome this issue, Guide 17 provides a HELP BOX Language, helping writers to use a clear style useful for a better understanding of standards.

This study also highlights how necessary it is to limit the number of reference standards. Indeed, SBS experts have observed in some of the selected standards the unfortunate practice of referring to a high number of supporting standards. Although this kind of arrangement may be reasonable for the drafters of the product standards, numerous references make the operability of standards more complex and have a negative impact on the usability of standards for SMEs.

6.5. Final review

Most of the selected standards being related to products to which no appropriate comparison can be made with other preceding standards, this research study cannot provide a qualitative input on suggestions for transition periods during the drafting of these standards. However, for prEN 13216-1rev on chimneys standard writers would reasonably assume, given the ordinary amount and complexity of technical modifications from the previous standard, the adoption of a default transitional period (about 1 year). This is in line with principles of Guide 17, which suggest that “the amount and complexity of technical modifications should be reflected in extensions of the transition periods”, with particular attention to those cases when “a European Standard introduces a completely new requirement or solution in some countries”. In this case, “the coexistence period should be significantly prolonged.”

To what concerns the evaluation on the need for an implementation manual, this study observes this principle has not been adequately taken into account during the drafting phase

of the selected standards. However, Guide 17 clearly specifies that in case of complex legislation, a supportive tool such as an implementation manual might be needed when it is impossible to proceed with the simplification of standards.

7. Conclusions and steps forward

SMEs operate globally in almost all sectors with different roles. The possibility for them to refer to accessible (in terms of costs, availability and skills) and standards constitutes a powerful means of boosting their competitiveness in the internal market. Thus, it is clear that standards writers have to adequately contribute to the drafting of standards aiming at guaranteeing an easy approach for those stakeholders -with particular attention to SMEs- who are supposed to read and make proficient use of them. Indeed, as the interests of different stakeholders involved in the manufacturing, distribution or use of specific products and services may be substantially divergent, it is essential that the interests of “weaker” actors such as SMEs are sufficiently taken into account.

Also on the basis of this consideration, the role of SBS and CEN-CENELEC within the SME Working Group is essential to address adequately the issues that SMEs are currently facing in the field of standardisation. The SME WG has previously been responsible for the development of the relevant initiatives which have led to the creation of tailor-made tools for SMEs such as the SME Toolbox⁴ and the e-Learning Tool⁵, both promoted also by SBS. With the same purpose of serving the interests of SMEs in standardisation, it is necessary to promote further concrete actions, such as the extension of the usage and knowledge of Guide 17.

In this framework, SBS foresees liaising activities with NSOs -where principles of Guide 17 are better promoted- to exchange ideas and best practices to be implemented at European and international level through the involvement of SBS experts. In order to achieve this result, SBS will engage in knowledge-transfer activities on the principles of Guide 17 among its 51 appointed experts representing the interests of SMEs in standardisation in 19 sectors. Moreover, SBS strongly encourages the possibility for SBS experts to raise awareness about the contents of Guide 17 in occasion of relevant TC/WG meetings.

At TC level, SBS and CEN-CENELEC efforts are noticeable in better promoting the contents of CEN-CENELEC Guide 17 as demonstrated by the successful organisation of a joint webinar⁶ on the use of the Guide 17 in Technical Committees. With the same spirit, SBS will remain actively involved in the activities of CEN-CENELEC SME Working Group, addressing SME needs for a step change in accessing the benefits of using standards.

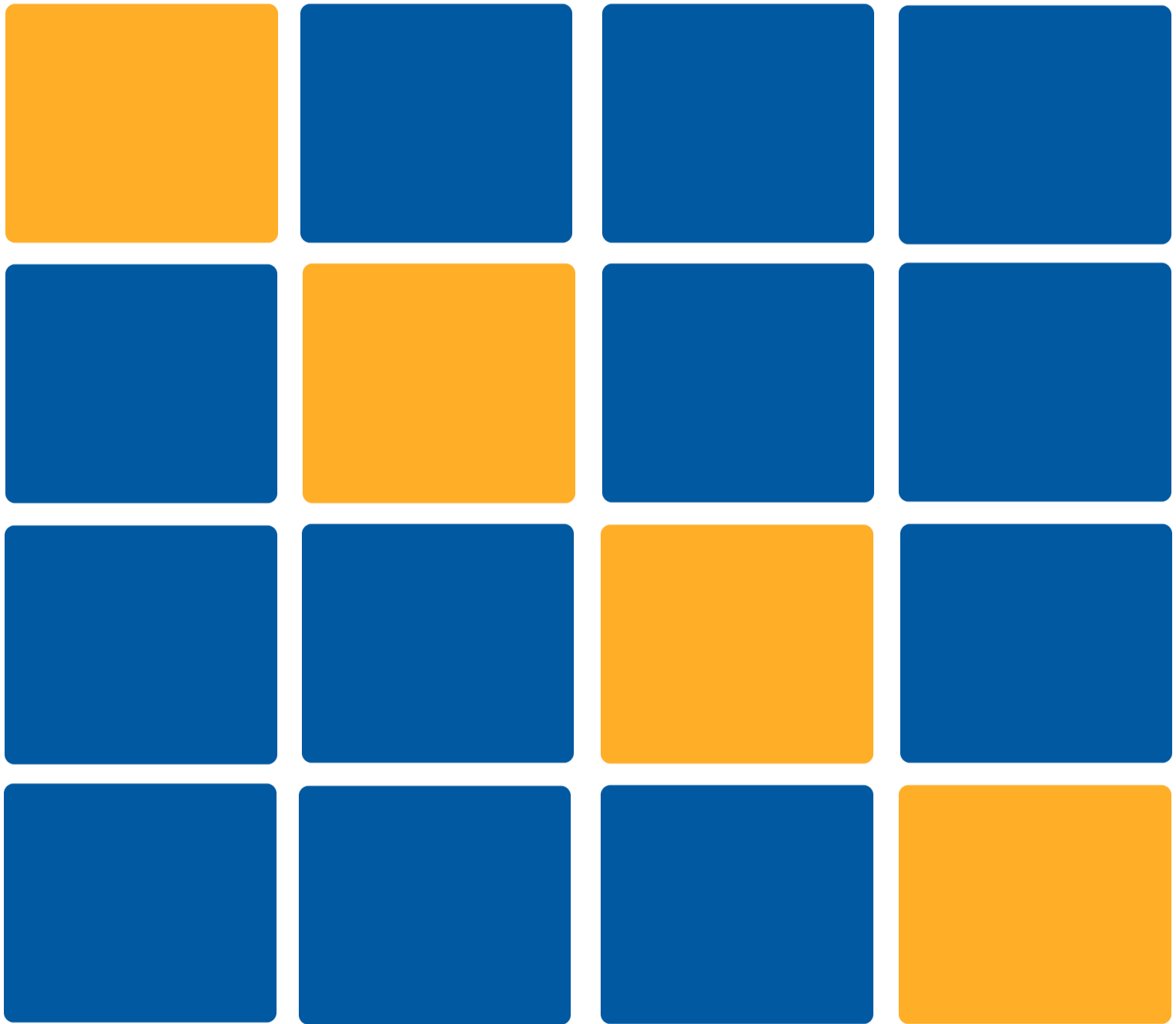
⁴ Online available at: <http://www.cencenelec.eu/sme/std/Pages/default.aspx>

⁵ Online available at: <http://www.cencenelec.eu/sme/eLearning/Pages/default.aspx>

⁶ Online available at: <http://sbs-sme.eu/news/sbs-and-cen-cenelec-joint-webinar>

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