

**PU Europe comments on  
The concept of Partnership with European Organisations –  
Stakeholder Consultation Document (CEN/CENELEC)  
Draft V10**

PU Europe has taken note of the above consultation document in which CEN/CENELEC propose new rules for partners including liaison members.

According to the proposal, the number of TCs a European sector association can liaise with would be limited to two. Furthermore, after a three-year trial period, the liaison member would be obliged to pay €500 per TC and year.

We urge CEN/CENELEC to withdraw this proposal which seems to ignore a number of basic facts. European sector associations such as PU Europe are financed by companies. These same companies already

- Pay to acquire standards.
- Pay for the participation in national mirror committees in a number of countries (or finance their national sector associations to participate).
- Pay for a number of product TC or WG secretariats (hosted by NSBs), or run those secretariats themselves free of charge. As a matter of example, PU Europe finances the secretariat of TC88 WG6. We assume this covers “the administrative costs of managing IT access to the TC working documents”.
- Provide very substantial expertise to the standards development free of charge (including travel costs and working time);

Furthermore, European sector associations offer a coordinated EU standpoint of the industry concerned. This saves significant time and money in the standardisation process.

The amount of €500 per TC and year is not substantial, but fees are likely to be increased regularly without sector associations having any voting rights.

Standardisation bodies cannot arbitrarily limit the number of TCs a European sector association can have access to. This is in contradiction to the provisions of article 5 of the proposal for a Regulation on European Standardisation, which calls for the inclusion of all stakeholders in the drafting process of standards. PU Europe counts many SMEs in its membership, which should not be excluded from this process.

Furthermore, harmonised standards relating to the Construction Products Directive / Regulation are compulsory in their application. Unlimited and free access to the Technical Committees concerned should therefore be a basic right. This is reinforced by the fact that CEN receives financial allocations from the European Commission for the drafting of such standards.

The conditions for participating in TC work (including “There is a real need for such assistance and it is positively sought by CEN and/or CENELEC National Members to support their efforts within the Technical Committee in question”) are ambiguous and open to misuse. This implies that a European association can be excluded from a TC drafting harmonised standards the application of which is compulsory for the association members. This should be considered as serious discrimination.

We would ask you to calculate the amount of money each industry sector already pays per standard today based on the above bullet points. Given the economic circumstances, it becomes increasingly difficult to find experts who are prepared to invest in the drafting of standards. By introducing new formalistic and financial barriers, you will discourage companies even further. Over time, only a select few will be willing and able to participate and the very purpose of the system will be compromised.

**PU Europe calls on you to remove the limitation to two Technical Committees and guarantee free access to TCs drafting harmonised European standards which are mandatory in their application.**

Brussels, 31<sup>st</sup> August 2012