1. Today standardisation requests from EU are formulated without a clear focus on the object of standardisation, e.g. the particular product, process, service or system, and on the purpose of the standard, e.g. requirements or guidance. As a consequence, the end result may not meet the requester’s expectations and the process to reach this stage may have been costly and time consuming. Further, standardisation requests should only be made when having a clear idea of how assessment of conformity should be conducted (for example testing, inspection, certification, verification). Often this issue is only addressed when the standard is published, why the opportunity for rational and efficient solutions may be lost. Such a situation frequently leaves the regulator in a difficult position.

This issue is not captured in the roadmap. To do so, we would suggest adding a bullet to “Problems the initiative aims to tackle” with text:

- Today standardisation requests from EU are formulated without a clear focus on the object of standardisation

2. To formulate and communicate the process to set and implement the strategic priorities is vital, as is the introduction of mechanisms to monitor and ensure the proper implementation of ESS and new standards.

All bullet items in “B. What does the initiative aim to achieve and how” are formulated to support the approach to the “global standards-setting in areas of strategic EU interest” referenced in bullet (2). This roadmap is built on the premise that EU has defined areas that from a standardisation point of view are of strategic EU interest, have made these known and have explained why they should be given priority to the wider group of stakeholders ultimately involved in the standardisation effort. Further, the strategic thinking seems set to be limited to the definition of these “areas of strategic interest”. This may help in selecting the standards to be prioritized, but it does not help in formulating the content of the specific standard to be developed. Which aspects needs to be properly addressed to cater for EU interests? What is “properly” from an EU point of view? These issues are, in our experience, most often decided upon by the individual sponsors of individual participants in the standardisation process. Sometimes they are indeed discussed at the national level, but there is no mechanism and few incentives in place for participants to formulate and coordinate an EU approach to international standardisation efforts. In our experience the question on how to implement a new standard is often overseen and can cause problems that is not foreseen during the process. That question should also be addressed.

These issues are not captured in the roadmap. To do so, the initiative in our opinion also has to cover these questions to succeed:

- The formulation and communication of strategic areas for standardisation
- Addressing the aspects EU wishes to manage through standardisation in the strategic areas
- Establish mechanism that would ensure that the implementation of strategic priorities and new standards could be achieved in practice.