Brussels, 23 December 2009

Our Ref. 1096279

Object: Commission Working Document COM (2009) 647/3 Consultation on the Future "EU 2020" Strategy

Dear Sir, Dear Madam,

The European Free Trade Association (EFTA) would like to thank the European Commission for providing stakeholders with the opportunity to comment on the 2020 Strategy.

EFTA co-finances together with the European Commission, European standardisation activities in Europe. The EFTA TBT Committee deals with inter alia standardisation and conformity assessment policy issues.

The EFTA Secretariat is an observer in the Expert Panel for the Review of the European Standardisation System (EXPRESS) established by DG Enterprise and Industry in January 2009. The final EXPRESS report with recommendations is expected at the end of January 2010. Although the report is not available yet, an EXPRESS issues paper was published for the conference organised by the DG Enterprise and Industry on the World's Standards Day on 14 October this year. As a matter of fact there is an overlap between many of the challenges for Europe raised in COM (2009) 647/3 and in the EXPRESS issues paper. European and international standardisation may contribute to find answers to the challenges set out in COM (2009) 647/3.

Furthermore, based on experience of product markets, it is of concern to the EFTA TBT Committee that, in creating the Single Market for services, this may be counteracted by certifications schemes created and operated at the national level which would be lacking cross-border recognition.

Against this background, the EFTA Secretariat would, on behalf of the EFTA TBT Committee, like to propose that the following two paragraphs be included in the paper that will be discussed at the European Summit in March 2010:

"Standardisation contributing to the success of European policies

European standardisation has already made a considerable contribution to the Single Market and several European policies. This strategy identifies a set of policy challengers for Europe (inter alia climate change/environment/energy saving, industrial policy and innovation, interoperability in several important sectors, the internal market for services and European companies' access to open, global markets). The EU will in the future rely even more on the

contribution European and international standardisation makes to succeed with our policies. In creating new policies or legislation, or in reviewing existing policies or legislation, the EU will (as a default) assess the likely contribution of standardisation."

"Certification at the national level as a tool, and possible hindrance, for creating a Single Market for services.

In creating the Single Market for services, due attention must be made to the quality and safety of services. In this respect, the Services Directive 2006/123 calls for the use of certification of services as a quality tool. As certification schemes operating at a national level with no cross-border recognition may fragment the Single Market, further consideration is needed with regard to the market for certification services. The precautionary principle should be applied with regard to certification of services, to strike the best balance between the free movement of quality services in the Single Market and the use of certification as a quality tool."

We sincerely hope that the European Commission will find a place for the above proposals, as a contribution to the achievement of important EU policy objectives.

Sincerely yours,

Gunnar Selvik Director

Secretary General European Commission Rue de la Loi 200 1040 Brussels Belgium