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Sent by e-mail to:

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Dear Sir/Madam

IAAPA Europe welcomes this opportunity to contribute to the **Public consultation on the review of the European Standardisation System**.

IAAPA Europe is the recently created European chapter of IAAPA – the International Association of Amusement Parks and Attractions - the largest international trade association for permanently situated amusement facilities worldwide. 700 of IAAPA's 4,300 worldwide members are represented by IAAPA Europe and this number continues to grow.

As IAAPA also represents the suppliers to the attractions industry, it is deeply involved in the creation, updating and dissemination of amusement ride safety standards around the world. In December 2004, the first European standard on amusement park safety - EN 13814 *Fairground and amusement park machinery and structures* – was published. It was drawn up by the CEN/TC 152 technical committee with representatives from the amusement ride industry, public authorities and consumers, and is now being updated. IAAPA is contributing to this process.

EN 13814 is one of a series of safety standards worldwide, all intended to create the safest rides possible for both guests and ride-operators. Other examples include the German standard, DIN 4112, and the US ASTM F24-standard. It is the ambition of IAAPA over time to facilitate the harmonisation of national and regional safety standards into one international standard, securing the highest possible levels of safety in amusement parks across the world.

Technical standards such as these are, we believe, successful examples of how standardisation can improve consumer safety, raise quality and remove trade barriers. International service-sector and, specifically, tourism standards are, however, a completely different proposition. Visitor attractions, accommodation and catering establishments, and public transport all compete on their differences - on the service qualities that set them apart from their rivals. Different cultures and different countries do things in different ways. Pan-European or international standardisation of tourism services would reduce competition rather than enhance it.

We now answer the consultation document's questions in turn.

Question 1: Do you think that service standards (including process standards) and alternative standardisation documents should be included in the scope of Directive 98/34/EC or its successor?

IAAPA Europe is not in favour of including service standards in the directive. In certain cases, some national standardisation bodies (NSBs) may want to develop service standards based on specific market conditions in their own countries. However, meaningful *pan-European* service standards will be very difficult – if not impossible – to develop.

There is, in our view, little or no support for pan-European tourism service standards from businesses and their representatives.

Question 2. Are you aware of specific cases where national service standards and alternative standardisation documents have caused technical barriers to trade?

IAAPA Europe is not aware of such cases.

Question 3. For areas other than Information and Communication Technology (ICT), should it be possible to refer to documents developed by fora and consortia in legislation and public policies? If it should, how should it be implemented?

This is more a question of democracy and transparency in the standardisation process, balancing the need for rapid progress against ensuring that the end standard has widespread acceptance and practical relevance. Considering other forums' documents could only be justified if committee members were unanimously in favour of those documents being used.

4. How could ESOs and NSOs be encouraged to accelerate their standards development process? Should for example the Community financing for standardisation be subject to conditions in terms of speed of delivery whilst maintaining the openness of the process?

IAAPA Europe considers that imposing time limits for standards development will not improve the quality of the final standards. The focus should always be on maximising industry participation in the process. Tight deadlines and a concentrated work programme would deter the participation of industry representatives, and especially those from SMEs. Nor would they do much to reduce the already high cost to businesses of taking part, which is itself a deterrent to deeper business involvement.

5. Should the WTO principles of transparency, openness, impartiality, consensus, efficiency, relevance and consistency be integrated in the legal framework of European standardisation (especially in EU Directive 98/34/EC or in its successor)? How should this be implemented?

IAAPA Europe agrees that the WTO principles should be implemented into the legal framework, if this will increase the focus on industry participation, ensuring that industry representatives have a formal voice in the process and decision-making that goes beyond being an advisory presence.

We would also be in favour of WTO principles being employed if they meant that real, in-depth market analyses were an indispensable part of any decision made to develop

a new tourism service standard. It is essential that the only standards developed are those which respond to market needs.

6. How could the participation of consumer organisations, environmental NGOs, trade unions and social partners, and SMEs be best promoted? What should be the role of public authorities (European Commission and Member States) in supporting such a participation in a transparent, open, impartial, consensual, efficient, relevant and consistent European standardisation system?

IAAPA Europe believes that there should be clear minimum requirements for balanced communication between the NSBs and all bodies interested in any standard being proposed. It is not the NSBs who have the sectoral expertise needed to create practicable standards.

Certainly, from our industry viewpoint, we would want to see full and effective consultation with industry representatives in the assessment and development of new standards. The process is not a very open one at present. Better communication would help to make it much more open, fostering a keener sense of participation from industry. It would also help to ensure the relevance of standards being developed and enhance the quality of the final standards.

7. How could the NSOs (National Standards Organisations) deepen their cooperation, and mutualise their activities? Could the following tasks be shared amongst several NSOs?

1. Management of the Secretariats of Technical Committees?
2. Notification of new national standardisation projects?
3. Promotion/sales of standards?
4. Other?

IAAPA Europe does not have an opinion on this matter.

8. Without prejudice to the national delegation principle, how could the European Standards Organisations (ESOs) manage directly, on a case by case basis, some standardisation activities, especially some Technical Committees?

IAAPA Europe does not have an opinion on this matter.

9. What support should the European Commission provide to facilitate the use of European standards as a means to open global markets? What would be the operational means that the Commission should use? (Support experts' participation in international standardisation activities, translation of European standards into extra-community languages?)

Mandatory translation into primary languages, financial support for travel to international standardisation activities, and the availability of general funding to promote European standards would all be valuable forms of support.

10. Under which conditions do you think that the European Commission could launch, on a case by case basis, calls for tenders, open to the ESOs and to other organisations, to develop standards supporting EU policies and legislation?

The most effective tool will be to ensure – by thorough market research and consultation with the industry – that there is an actual demand for any standard that is being proposed. If there is no support from the industry, the quality of the standard will suffer from lack of expert participation – and from a lack of practical relevance, when finally published.

11. What is, in your view, the most efficient level of participation in the process of standards development: national, European, international?

The level of participation will surely depend on the nature of the standard being developed. If the question refers to participation in the development of European standards, there is a clear need for a balance of expertise, bringing together national representatives with day-to-day experience of working in the sector affected and the European representatives, who have the strategic overview of European processes and policies.

12. In your opinion, where is the major added value in European standardisation with respect to national standardisation?

With regards to technical standards in our area of expertise (ride safety in amusement parks), the main advantage is the enhanced level of safety for our customers and for the employees operating the rides.

The same is not true of tourism service standards. We see no added value in European standardisation. Such standardisation would be counter-productive, reducing the diversity and competition, while inevitably succeeding only in achieving the level of 'lowest common denominator' - a very basic level of services at which harmonisation of standards does become possible.

National standards make much more sense for tourism services as they are better suited to reflecting practice, traditions and the culture that are known in the country in question.

13. What are, in your view, the most serious barriers to the use of standards by enterprises: costs of standards (purchasing price)? Costs of operational implementation? Access to information? Knowledge of existing standards?

In IAAPA Europe's opinion, the primary barrier is very often relevance. If there is no market need for a standard that has been developed, it will not be used.

14. What could the standards organisations do, in addition to their current practice, to facilitate the access to standards, especially by SMEs?

Aside from ensuring that standards are practical and relevant to market needs, the starting point would be to make all standards available free of charge. The best standards are the results of a joint collaborative effort. This joint effort should result in joint ownership.

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We look forward to seeing the outcome of this consultation process. In the meantime, if you need any clarification of the points raised in this response, please do not hesitate to contact us.

Yours faithfully

Andreas Veilstrup Andersen
Executive Director, IAAPA Europe