



First steps in Standards representation: a guide for consumer organisations



Acknowledgments

First steps in Standards representation: a guide for consumer organisations has been prepared as part of Consumer International's (CI) Phase III of research for its Decision-Making in the Global Market programme.

The programme commissioned case studies on national level Standard-setting processes from national consumer organisations to gather evidence on how to improve consumer participation in Standard setting and indicate good and bad practice. The case studies and the lessons learnt from them have served as a basis for writing this manual. The names of the eight organisations and the case studies are listed as an appendix on page 15 of this manual.

Summaries of the case studies are available in English, French and Spanish on CI's website in the Publications section at: www.consumersinternational.org/standards

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First steps in Standards representation: a guide for consumer organisations

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This manual was written by Chris Evans and Bruce J Farquhar , with input from staff and members of Consumers International.

1. What this Guide is for

The aim of this guide is to provide guidance to consumer organisations to assist and encourage them to become involved in the development of Standards.

The content of this guide is largely based on the experiences of consumer organisations that have already become involved in developing Standards at the national level. We have drawn on case studies that were collected as part of Consumers International's Decision Making in the Global Market programme.

Emphasis in this guide has been given to providing basic 'first steps' information and has been structured around the assumption that consumer organisations have serious constraints on time and money and that there are many competing demands on the resources of consumer NGOs.

This guide is intended for the staff and volunteer workers of consumer organisations. It can be used as a step-by-step introduction to the theory and practice of consumer participation in Standards making.

The length of this guide naturally restricts how much detail we can go into on individual topics. However, you will find references for sources for further information in all sections. There is a wealth of information out there and you should use this to support your efforts. Help is also available from Consumers International.

National consumer organisations in Europe can also obtain help from ANEC, the European consumer voice in standardisation. ANEC is funded by the European Union (EU) and the European Free Trade association (EFTA). Although EFTA only services their European members their website is useful and could be of benefit for consumer organisations around the world.

Sources of further information

Consumers International (CI)
www.consumersinternational.org/standards
 In particular look at the CI Briefing paper: *International Standards (non-food topics)* which lists CI's current areas of work at the ISO and the IEC.

CI's Latin America office maintains its own Spanish language website on standards:
<http://consunorma.consumidoresint.cl/>

ANEC at www.anec.org

2. What are standards and why are they important?

Standards are hugely important for consumers. They have an impact on almost every product and service that consumers come into contact with – the transport they use to travel to work, the electrical goods they use at home and the supplies in local shops and the services offered in their communities.

Most Standards are invisible to consumers, who take for granted what they provide. Consumers assume that the products they buy are safe, but safety is almost certainly specified in a safety standard. Most consumers take for granted that washing instructions are consistent between the different garments they buy and that electric plugs are a good fit into the corresponding sockets, and so on. All of these convenient features are underpinned by Standards.

New Standards are constantly being developed and established Standards are frequently amended. Consumer organisations can be involved in this process. Alongside industry and regulators, consumers are the principal stakeholders in Standards-making.

The term 'Standards' is used to convey a variety of meanings. The media often talks about standards of behaviour or performance. In this guide we are dealing with national published Standards such as a British Standard (BS...), Malaysian Standards (MS...) and International Standards (ISO, IEC ...) etc. In Europe many of the national Standards are implementations of European Standards developed through the regional standards bodies. The term Standards can however also be used more broadly to describe a Code of Conduct, an industry self-commitment or any other form of agreed specification.

Standards were originally published to ensure goods and services could be manufactured and used in different countries and within a product range (the technical term is 'interoperability') and have had an impact on competition and efficiency. They are increasingly being promoted as the way to reduce barriers to trade that stop goods and services being freely traded around the world.

National standards bodies

Most countries have their own national standards making body. These bodies normally have the following roles:

- they write and publish their own national Standards
- they represent their country at regional and international setting forums
- they hold a reference library of national/regional/international Standards
- they sell copies of Standards.

Some standards bodies are also engaged in conformity assessment through certification and other commercial activities.

The use of Standards may be voluntary or governments may require their use by referencing them in regulation. Under the World Trade Organization rules governments are required to base their national regulations on international Standards, as much as possible.

Partly because of these rules and also because of the general globalisation of trade, Standards are increasingly being written at the international level. You may find when if you approach your national standards body about a specific issue that it is not being dealt with in a purely national Standard but in an international Standard.

As we discuss in greater detail on page 6 the role of the national standards body is not to write the standard itself but to co-ordinate a national view to be represented by its delegation to the international standards body.

International standards bodies

There are four international Standards making bodies who deal regularly with consumer issues:

IEC - International Electrotechnical Commission

ITU - International Telecommunications Union

ISO - International Organization for Standardization

CODEX - Codex Alimentarius Commission.

IEC Standards cover electrical equipment, ITU Standards cover telecommunications equipment and ISO Standards cover the remaining products and services. Codex Standards cover food.

ISO and IEC are made up of national members (DIN, the national member Standards Body for Germany, ZABS for Zambia etc) and it is representatives from the membership that make up the individual committees that write Standards.

In some countries, food and telecoms Standards are treated differently and are not the responsibility of the national standards body.

Some typical examples of Standards include:

IEC 60335 – covers the electrical safety of household appliances

ISO 9000 – covers quality management and quality assurance Standards

CAN/CSA-Z262.1-M90 (R2002) Ice Hockey Helmets

Codex STAN C1 – Cheddar cheese.

This guide goes on to focus on the standards-setting processes found in ISO and IEC and their national members. The work of ISO and IEC were one of the focuses of Consumers International's (CI) Global Governance project. Information about participating in other standards-setting bodies is available from CI and other sources. For example, CI has written a training manual specifically aimed at participating in the food standards development work in Codex Alimentarius. (see references on page 5).

Sources of further information about ISO, IEC and their national members

International Electrotechnical Commission IEC
www.iec.ch/

Note. This site has a search facility and offers a 'PREVIEW' of published Standards

International Organisation for Standardisation ISO
www.iso.org/

Note. This website has a search facility and but does not offer a 'PREVIEW' of published Standards

List of national standards bodies

On behalf of the WTO, ISO periodically publishes a Directory of standardising bodies that have accepted the WTO Agreement on Technical Barriers to Trade (TBT). This list is a good way to start to identify standards bodies in your country. ISO and IEC also publish lists of their members on their websites.

www.iso.ch/iso/en/comms-markets/wto/pdf/scd2005-1-en.pdf

Sources of further information for participating in other standards bodies

Codex Alimentarius Commission

www.codexalimentarius.net/web/index_en.jsp

Note. This website has a search facility and permits free-of-charge downloading of its published Standards.

NGO Participation in Codex

www.codexalimentarius.net/web/ngo_participation.jsp

Codex Alimentarius: a set of three resource manuals

Three resource guides, in one publication, that cover different aspects of consumers involvement in Codex Alimentarius. Resource manual 1: *Codex for Consumers: What is it all about?* Resource manual 2: *Demystifying the different codex committees* Resource manual 3: *Participation of consumer organisations in Codex Alimentarius*. Published in 2000. Available from CI website at: www.consumersinternational.org/food

International Telecommunication Union (ITU)

www.itu.int/home/index.html

Note. This website has a search facility and but does not offer a 'PREVIEW' of published Standards.

Guide for ITU-T Groups - 'Considering End-User Needs in developing Recommendations'

At its March 2005 meeting, the Telecommunication Standardization Advisory Group (TSAG) of the ITU's Telecommunication Standardization Sector (ITU-T) adopted on an experimental basis a guide for ITU-T Groups - 'Considering End-User Needs in developing Recommendations'. The guide is intended to assist ITU-T Study Groups by providing information and ideas on how end-users' needs can be taken into account in the development of ITU-T Recommendations that have direct implications for end-users. The guide contemplates seeking end-user opinion from groups such as ISO COPOLCO, Consumers International and ANEC.

www.itu.int/ITU-T/studygroups/templates/index.html

3. Why consumer organisations should be involved with writing Standards

Standards are written by stakeholders, not by some anonymous government or industry body.

Usually, the process begins because there is a problem to be solved and the Standards-making route has been seen as one able to provide a solution. Standards are usually written by a group of people, who represent various stakeholders or are experts in a particular field, often described as a committee or working group. Technical committees have a Chairman and Secretary (usually an employee of the standards body. Working Groups have a convenor to co-ordinate the work.

Not surprisingly, the first people to volunteer to take part are usually those who have the problem to solve. If such a group of people was unbalanced, ie biased to just one stakeholder sector, then it would not be surprising if the Standard that was drafted was biased towards the needs of that particular stakeholder group.

Often, this will not matter. For example, if a Standard was needed to regulate the dimensions of railway tracks then stakeholders biased towards the needs of the railway industry would probably be sufficient to ensure a good Standard was written. Conversely, if a Standard was needed to support the regulation of trade to consumers then a Standard written by stakeholders who all represented industry is less likely to be balanced to the needs of all stakeholders. In such circumstances, a better Standard is likely to be created if the people writing that Standard included representatives from the regulator (probably government) and end users (perhaps a consumer NGO).

Consumers could leave the writing of the Standards that impact on the products and services they use to others. Although this is often what happens, there are at least three categories of Standards where consumer representation clearly should be sought:

- an existing Standard that impacts on consumers is unfairly weighted against them
- the Standard covers an area of high risk to consumers
- the Standard is being written on a topic that is high priority for the consumer organisation - perhaps in an area where it has been campaigning.

The case study below from Which? demonstrates the positive impact consumer organisations can have in writing standards.

Experience from a UK consumer representative



Several years ago a UK consumer representative working for the Consumers' Association (now Which?) proposed a change to an existing Standard, in order to eliminate a safety hazard on a washing machine. That change was agreed by the European regional Standards making body (CENELEC, who publish some of the 'EN' Standards). By 2005 all 14 million washing machines sold in the European Union had had that hazard removed. And all because of the work one consumer representative and just three meetings!

Sources of further information

Your voice matters - Why consumers need to participate in standards- making... and how to get involved

This brochure from the Consumer Policy Committee of ISO, ISO-COPOLCO, provides a good basic introduction to how standards at all levels can improve from consumers' input in their development, and why it is so important for consumers to participate actively in the standards-making process. It describes the role of consumer representatives in ISO work and lists the particular benefits (fitness for purpose, safety features, environmental protection, etc.) of consumer participation to Standards. It contains useful information and actual examples where consumers' participation has favourably influenced Standards.

www.iso.org/iso/en/prods-services/otherpubs/pdf/copolcoyourvoicematters_03-en.pdf

The document is also available in Spanish.

4. How standards are written and how to get involved

Who writes standards?

National Standards are written within the committees established by the national standards bodies. International standards are written within the Technical Committees and Working Groups established by the international standards bodies.

At the national level all stakeholders should be able to participate around the table. However at the international level the participants are national delegations of members who have chosen to participate in that technical issue. The national delegations are formed by the national standards bodies who are responsible for ensuring that their delegations represent the national interest of all stakeholders in their country. Some international organisations such as Consumers International also have the right to participate directly in Technical Committees at the international level, as observers (ie they do not have a vote).

Understanding the Standards making process

Standards making is governed by strict rules and processes. Taking an informal approach or trying to speed the process up by cutting corners is usually counterproductive.

Most national standards bodies that are also members of ISO and IEC follow the same standards development process contained in the ISO and IEC Directives. This is a seven-stage process:

- Stage 1: Preliminary stage
- Stage 2: Proposal stage
- Stage 3: Preparatory stage
- Stage 4: Committee stage
- Stage 5: Enquiry stage
- Stage 6: Approval stage
- Stage 7: Publication stage.

The best source of advice on the rules that operate in any particular country and the rules that govern international Standards making is the relevant national standards body. They exist to facilitate Standards making so it is in their prime interest to make sure that everybody they work with is fully supported throughout the process. Some national standards bodies offer regular programmes of training on rules and procedures. Failing that, the Secretary of any Standards-making committee can always be canvassed for advice on rules and procedures –after all, they are there to see that the rules are adhered to anyway. The

Secretary of the Technical Committee you are participating in or wish to participate in should be a good starting point.

Understanding the rules not only reinforces the confidence of the consumer representative but also ensures that they can take action should others try to break the rules. Some stakeholders with a substantial vested interest in the outcome of Standards-making may sometimes attempt to take unfair advantage by abusing the rules.

Normally the rules also provide a means of appeal. The provision of such a procedure is important and should be invoked when necessary. Examples of where this might be necessary include circumstances where other rules have not been observed or where proposed outcomes are being unreasonably biased due to excessive pressure from a sub-group of stakeholders.

Active involvement in Standards-making

To start to become more involved in standards setting national consumer organisations should seek a meeting with their national standards bodies to discuss their interest and the opportunities that exist for support and participation.

If a deficiency in a Standard has been identified, the minimum that any consumer organisation should do is draw it to the attention of the national standards body. This should always be done formally, in writing. This is the best way to ensure that the topic is dealt with properly rather than filed and forgotten. Any submission should use the template provided by the standard body to submit comments whenever possible and be fully detailed, ie include the full Standard number, the clause number, a detailed description of the problem and, if possible, a proposed solution. A copy to the Chairman and Secretary of the relevant Technical Committee is also useful.

Always offer to meet the committee who would be responsible for dealing with the issue. A meeting provides a number of opportunities and, most importantly, it ensures the committee fully engages with the topic. It also makes it more difficult for them to say ‘no change to the Standard’.

Getting a seat at the table

The real starting point to more active involvement is getting a seat at the table. All Standards bodies that are members of ISO and IEC have signed up to the Code of Good Practice for the Preparation, Adoption and Application of Standards as contained in Annex 3 of the WTO's Agreement on Technical Barriers to Trade (TBT). This code of practice requires the standards

bodies to comply with transparency provisions made within that code and must involve all stakeholders. The box below outlines how ISO and IEC have made several recommendations to their members about consumer participation in Standards work and require their members to allow consumer representatives to participate in their work.

ISO/IEC Statement on 'Consumer participation in Standardization work'

The statement acknowledges that 'Standards, either international or domestic, should be developed based on a consensus among all interested parties, including manufacturers, users and consumers,...

'Consumers are one of the most important stakeholders of standards, especially as regards goods and services for consumers. It is essential that consumer representatives participate in the standards development process for these products and services.'

The statement goes on to make a number of recommendations to the members of ISO and IEC, the aim of which is to help promote greater consumer participation in the standardization process. These recommendations address for example the need for national standards bodies to

- support ISO and IEC initiatives aimed at encouraging consumer representation in standardisation.
- have consumer participation in drawing up their standards work programmes and in relevant policy matters
- inviting consumer interests to participate in all national technical committees dealing with standards projects of consumer interest.
- enable consumers to participate in priority areas of consumer interest if no external funding is available
- seek the active participation of consumers in national delegations to international Technical Committees primarily of interest to consumers
- provide guidance and training to consumer representatives on technical issues.

Source: www.iso.org/iso/en/prods-services/otherpubs/pdf/copolc participation_2001-en.pdf

In some countries, particularly where civil society is weak or where there are several NGOs competing to represent consumers, it may not be so simple to assert this right. To begin with, it may be necessary to submit a series of requests and to bring pressure on the Standards-makers through lobbying or pressure on government. It is always useful to try to build a relationship with your national standards body and agree how you may better work together and provide a consumer perspective to standards being developed in your country (see page 9).

Representing consumers in Standards-making must be recognised by the consumer organisation involved as a privilege that brings responsibilities. For example:

- The rules of some Standards-making bodies require that the early work on drafting a Standard is conducted in private and that the content of such discussions remains confidential to the meeting participants. Such rules are not usually intended to suppress transparency and free speech so much as to provide a forum in which commercially confidential information can be tabled and used to inform discussion. Such meetings would not normally be open to the public and documentation would not be available in the public domain until drafting the Standard had reached a certain level of development.
- If the organisation is the only one representing consumer interests then it must ensure this is done on behalf of all consumers, and not just the active members of their own organisation. Consequently, they must actively liaise with other consumer organisations to ensure that all views are considered and used to shape the overall views submitted as part of the Standards-making process. One way to achieve this is to persuade the national standards body to create a consumer consultative process as part of its rules.
- Often, the first involvement that a consumer organisation has in Standards-making is in assisting the process of writing specific Standards. Consumer organisations should seek a role in determining the policies of their national standards body, perhaps by achieving a position at decision making or Board level, to ensure that consumer is taken into account when developing relevant standards.
- Membership organisations are well placed to propose new Standards or amendments to existing ones. The best organisations take a pro-active role in this. Consumers are less well served

if their organisations are merely reactive when it comes to Standards-making.

First steps

If the most appropriate consumer representative has no experience of Standards then it is likely that they would need to participate in a number of meetings before their confidence and knowledge has risen to the level where they can expect to make an effective contribution.

This can be made easier in two ways:

- **Go with a friend.** Find out in advance of the first meeting who the other members are (the secretary will be able to tell you). Pick one who is likely to be more sympathetic to the consumer viewpoint and ask them if they would be prepared to act as a mentor (not a guardian!). Having somebody able to give feedback and constructive advice in the breaks in the meeting is very useful. Such an approach is unlikely to be turned away and can result in creating a lasting ally in that committee.
- **Be an observer.** If that approach is impracticable, then an alternative is to ask whether the new consumer representative can, in advance of taking up their duties, sit in on some other Standards-making committees as an observer. This provides an opportunity for familiarising themselves with the process without the additional pressure of being involved in the issues being discussed.

A combination of these two approaches is recommended.

Further preparation for the first meeting

If this is not the first meeting of that particular Standards-making committee, then read their documentation archive; the Secretary should be able to provide you with this information. Make sure you are familiar with the recent history of the meeting. Do some additional background research and build up a network of contacts who you can consult from time to time.

Make sure every document listed on the meeting agenda has been obtained, read and understood. Decide what the appropriate response is for each of those agenda items. There will often be a need to consult widely in order to identify these items. The consumer representative is going to be giving views that should reflect the interests of all consumers in that country so needs to know that these have been credibly established and that there is a robust answer if these are subsequently challenged.

Sources of supportive data include: survey data, accident statistics, ergonomic data and consumer usage information.

Who are the other members? Link the names to the organisations they represent, so that it is known that Mr/Ms X are from Y industry, that Mr/Ms Z is the government representative and so on. Look for people who are likely to be sympathetic to consumer issues, call them in advance of the meeting and introduce yourself.

Dress for your audience. Turning up in casual clothes only to find everybody else is wearing a business suit can undermine your confidence.

Practice talking, particularly about what seems to be the most important topics on the agenda. Have a colleague act as the 'opposition', in order to get some practice at dealing with the counter arguments.

Practice techniques for dealing with adversity – be open-minded and remain objective, seek alternatives but do not rush to offer a compromise.

Managing expectations

It is important that would-be consumer representatives and their organisations know what to expect from the Standards-making process.

At its very best, this process provides a real opportunity for a consumer concern to be embodied in a Standard in such a way that it literally changes – for the better – how something is done across the whole world.

Long-term commitment

Usually the pace of change is slow. At face value, Standards-makers try to work in open and transparent way and in a consensual atmosphere. These are welcomed by consumer organisations yet all these features act against speeding up the process. Creating a new Standard from scratch internationally normally takes at least three years - though much less time if done only at the national level.

Lots of meetings

There can be many meetings, often seemingly going back over the same topics. Missing meetings is a risk as the progress achieved at previous meetings might be undone if there is nobody there to defend it. Backsliding' can be one of the disappointing features of some Standards-making committees.

Skills, knowledge and experience

Effectively working in Standards-making will call upon a range of communication skills, technical

knowledge and experience of working within strict procedures. Standards making is not a role where a 'well meaning amateur' is likely to be very effective. A consumer representative is not required to provide technical solutions to every problem - that is a job for those who design products or implement systems. However, consumer representatives can highlight problems that are of particular detriment to consumers.

A daunting experience

The atmosphere in Standards-making forums can be quite adversarial. The culprits are usually the industry and consumer representatives. Both can believe that they are being attacked by the other. At best, there is often an imbalance in these forums with consumer representatives being heavily outnumbered by those from industry.

The end result can be a compromise

Not every stakeholder in the Standards-making process is going to agree with the views of consumers. In the worst cases, nobody else agrees. The likelihood that that consumer views will be accepted unchanged is low. More likely, they will be accepted, but in a diluted form.

Representation needs to be funded

It costs money to be involved in Standards-making. There usually is no charge to join the Standards-making process. (However, consumer organisations should be aware that more and more Standards-making bodies seem to be charging, especially in countries like the US, Brazil and Sweden). But everything else costs: staff time, back-office support, travel expenditure, background research etc. Some authorities do recognise the value of Standards-making and provide some funding support. At best, this is likely to cover travel expenditure only.

The empty commitment to engagement

This can be the most difficult problem to spot yet the one most likely to lead to lack of success. Many consumers fall to the assumption when they are invited to join a body that their views are being sought and will be valued. The reality can be different; the invitation may have come simply because the meeting host was required to demonstrate that all major stakeholders were involved in the process. Once the goal of having a consumer representative attend the meeting had been achieved there was no further need of the consumer representative and substantive input from them would not be encouraged.

What can consumer representatives expect from a national standards body?

The national standards bodies that are the Members of ISO and IEC have together agreed a policy statement on consumer participation in standardisation work. The main points are summarised in the box on page 7.

This statement can be used by consumer organisations when they approach national standards bodies with a desire to participate in their activities. The ISO code of ethics commits its members to organise national input in a timely and effective manner, taking into account all relevant issues at national level and to take appropriate measures to facilitate the participation of consumers and other affected parties from civil society, small- and medium-size enterprises and public authorities.

Consumers International members in Pakistan and in Latin America identified the steps that are needed in order to allow the consumer organisations to become more engaged in the work of their national standards bodies. Some of the actions identified are given in the box below.

Consumer associations want more engagement

Recently consumer organisations participating in CI-led projects in Pakistan and in Latin America have agreed on a series of recommendations with their respective national standards bodies. These included:

- identification in the national standards body of a consumer liaison officer
- better exchange of information between national standards bodies and consumer organisations on the standards work programme
- national standards bodies should participate actively in the consumer policy committee of ISO, ISO-COPOLCO
- national standards bodies and consumer organisations should work together to seek funding to support the sustainable participation of consumers in standards work.

Sources of further information

ISO-IEC Fact sheet from global governance project

Available on Consumers International website at:

<http://www.consumersinternational.org/Templates/Internal.asp?NodeID=93928&int1stParentNodeID=89651&int2ndParentNodeID=89699>

Governance in the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC)

Available on CI website at

<http://www.consumersinternational.org/Templates/Internal.asp?NodeID=93594&int1stParentNodeID=89651&int2ndParentNodeID=89699>

ISO Code of Ethics

www.iso.org/iso/en/aboutiso/ethics/ethics.html

ISO and the Consumer

A brief explanation of why and how ISO solicits consumers' views in its standardisation work, the favourable impact that consumer involvement has had on ISO's activities, the benefits consumers stand to gain from the standardisation process and how they help ISO look towards the future.

www.iso.org/iso/en/prods-services/otherpubs/pdf/copolcobrochure_2005-en.pdf

Consumer participation in standardization

The 2001 policy statement on consumer participation developed by the ISO Committee on Consumer Policy (COPOLCO) and approved by the ISO and IEC Councils.

www.iso.org/iso/en/prods-services/otherpubs/pdf/copolcoparticipation_2001-en.pdf

5. How to be an effective consumer representative

Taking part in meetings

The following section deals with the practicalities of participating in standards meeting. Readers should note that this section has been based on material for volunteer consumer representatives working in Standards-making in the United Kingdom by the BSI Group. For further information, please contact: Val Shepherd at: val.shepherd@bsi-global.com

Identifying the consumer interest

Attending meetings as a consumer representative means that you are there to focus on consumer concerns. There is no need to get drawn into the detail of other aspects of committee discussions, unless there are aspects of relevance to consumers.

Remember the basic consumer principles arising from John F Kennedy identifying the four basic consumer rights in his Special Message to the US Congress on Protecting the Consumer Interest (1962):

- the right to safety
- the right to be informed
- the right to choose
- the right to be heard.

The consumer movement, through Consumers International, has added four more rights:

- the right to satisfaction of basic needs
- the right to redress
- the right to consumer education
- the right to a healthy and sustainable environment.

Together these eight rights are reflected in the UN Guidelines on Consumer Protection and form the basis of determining the consumer interest by Consumers International and consumer groups worldwide.

Consumer representatives can translate these rights into Standards-making policy aims that are practical and understandable:

- improving consumer safety for all
- preventing accidents and mitigating the effects of accidents
- reducing risk
- promoting and maintaining health and hygiene
- promoting proper consideration of issues relating to vulnerable groups
- enhancing product/service performance within an overall framework of sustainable production and environmental protection
- promoting usability and the principle of design for all
- preventing exclusion of particular user groups, wherever possible
- improving product/service information for consumers
- facilitating consumer choice.

Clearly, the exact consumer interest needs to be determined on a case-by-case basis by the consumer organisation concerned. These must be representative of the national consumer view.

The consumer representative's role at a meeting

The main part of a participant's work in technical committees is assisting in the drafting of Standards and commenting on drafts. As part of this process the better briefed they are, the more allies they have built up and the more understanding they have of what others in the group are trying to achieve (or prevent happening), the better.

It is important to remember that consumer representatives are there to represent the consumer interest. There will be others on the committee to consider manufacturing and other detailed technical points. Consumer representatives should try to avoid being drawn into the committee's operational details. Their job is to concentrate on how the Standard affects the consumer. The national standards body's editing staff will deal with mis-spellings and other editorial details.

Participating in discussions should be active and positive. Consumer representatives who simply offer blanket criticism of what is proposed are not as effective as those who are able to suggest positive solutions and build a case for change.

Committees should not be viewed as an 'us and them' situation. Consumer representatives should be

prepared to discuss their position, respond to questions about it and be prepared to listen to other arguments and respond accordingly. Adoption of this engaging approach leads to gaining respect from other committee members; this in turn leads to becoming a more influential member of the committee.

On larger issues, or when firm proposals are made on which they do not feel confident in their response, they should ask for more time to consider the item and bring the proposal back to colleagues or other experts to help arrive at a position.

It is important to check that the minutes of the last meeting are a correct record of what was said and that actions agreed have been captured in the minutes.

Representatives should make sure that matters arising from the last meeting are on the agenda, together with any subject that they have requested. This latter point is important as it provides an excellent way to ensure the meeting covers the topic areas that matter for consumers.

Commenting on Standards

There are strict rules and procedures governing how Standards are produced. These rules include the frequent need to circulate documents for comment.

If comments are required on a draft Standard, these should be submitted as written documents. Comments routinely need to respect the format provided by the standards body concerned which will not tolerate the use of a different format. It is easy for verbal comments, made only in meetings, to get lost. Submitting in writing allows others to view, consider and either support or object to the views given. Overall, such submissions ensure that they get discussed.

Once the drafting stage is over and you are responding to a formal draft for public comment, it is essential that comments be given in writing under the appropriate heading. Any submission should use the template provided by the standards body to submit comments. And, where appropriate, should include a detailed description of the problem and, if possible, a proposed solution. The consumer representative should remember their role is to concentrate on content and meaning rather than get side-tracked into editorial detail.

It is sensible to share those comments with other organisations as well as informing other sympathetic contributors.

Consumers can sleep soundly in Kenya

In 1998-9, Consumer Information Network [CIN] was involved in a confrontational situation with the Kenya Bureau of Standards [KEBS] over the quality of mattresses. CIN was a member of the KBBS Technical Committee on Foam Mattresses dealing with setting Standards for the quality of mattresses sold in Kenya.

CIN had received many complaints from rural and urban consumers who were dissatisfied with the quality of mattresses they had purchased from supermarkets and other outlets.

The most common complaint was that the mattresses did not last long as they were supposed to and were below the required standard. The description on the tags attached to the mattresses did not match with the permitted density allowed by the Kenyan standard.

CIN conducted an independent study and assessment of the quality of the mattresses. They bought mattresses through random sampling and took these to laboratories for testing, including the laboratory at Nairobi University. The results indicated that these mattresses did not reach the Kenyan standard.

CIN decided to take the case further and queried KEBS to explain why they were allowing substandard products to be sold. CIN argued that KEBS had the statutory obligation to ensure that only quality and safe products were allowed in the market place.

KEBS did not accept this criticism in good faith and decided to expel CIN from the Technical Committee meetings.

CIN complained to then Minister of Trade and Industry. He sided with KEBS and was backed by the mattress industry. CIN then appealed to the President of Kenya who demanded to know why KEBS had acted against CIN. The matter was solved after the intervention of the President and CIN was reinstated on the committee.

Since that time, CIN has been well respected as a consumer advocate at KBBS and has been involved in setting several Kenyan Standards with CIN members attending Technical Committees at KEBS.

Compiled by John P Kinuthia of CIN

Some key points

Teamwork

Standards-making committees should be regarded as teams, dedicated to a carefully defined object, with each member having a part to play.

Compromise

Standards-making committees need to be practical and realistic in order to find solutions which give the community the economic optimum; this is safety, consistency of performance and quality balancing out the different stakeholders' interests.

The consumer representative's role is to ensure that the consumer interest is not compromised unnecessarily when there are genuine consumer issues that need to be addressed.

Because there can be no such thing as absolute safety, the Standard has to respond reasonably to peoples' expectations.

Often when making Standards the objective can more readily be achieved by taking small steps at a time. It is better to compromise in the face of absolute opposition than to fight to the bitter end.

Most published Standards are reviewed on a regular cycle, typically a maximum of every five years. Such reviews, and the continuing process of proposing amendments, provide opportunities to return to a topic and propose further enhancements.

Urgency

National Standards bodies rely on their committee members to act at every stage with a due sense of urgency.

The world can only wait a short time for Standards as neither technology nor trade stand still. Those who want a better, safer world want it now for themselves and their families.

Professionalism

Consumer representatives must avoid seeing themselves as the poor relation in the committee, with manufacturers as adversaries. Consumer representatives are vital members of the project teams, there not only to give an informed view from their knowledge of the subject, but also to highlight down-to-earth views about the needs of people who use consumer goods and services.

They should maintain a good attendance record, familiarise themselves with the appropriate drafting

rules, read the committee papers and be ready to contribute concisely and clearly where it really matters.

Prioritising

Consumer representatives should not fight on every issue which comes up – to do so would be too wearing and leads to the rest of the committee becoming less sympathetic to the consumer viewpoint.

Work out which points should be fought over and concentrate on these – they will then probably be supported by others on the committee because they will have seen that the consumer representative was willing to compromise on some less important issues.

Gaining support

Identify other user interests – government, other consumer organisations and safety organisations. It gives strength to an argument if it is supported by several members of the project team and it helps speed up the work if all user interests speak with the same voice. Use breaks in meetings to build confidence and alliances.

Constructive comment

Consumer representatives should make it clear when they do not agree and aim to offer alternative solutions so as to be constructive, purposeful, positive and professional. They should volunteer for working groups where they can make a useful input.

Dealing with conflicts of opinion

It is helpful if all members of the committee, even those with opposing points of view, can work as friends/equals. Sometimes consumer representatives find themselves in conflict with an organisation that they would generally regard as an ally (like another consumer or safety organisation). Take steps to resolve these issues 'offline', prior to the meeting or discussion point, so that the consumer position is not undermined in a meeting.

Ten principles to apply to Standards making

1. Preparation is vital

Know the rules, read the papers.

2. Find a friend

Confidence building is important, find help to learn the ropes and provide guidance in those early meetings.

3. Secure funding for the longer term

Involvement costs money and Standards can take years to write.

4. Learn to compromise

Stubborn consumer views, especially negative ones, are rarely persuasive.

5. Know the consumer context

Use the consumer rights to help frame your policy aims.

6. Prepare a robust case

Do background research, get hard data – don't campaign on a hunch

7. Make sure the national standards body recognises that consumers are major stakeholders

Request a seat on the Board; seek a role at policy- making level.

8. Avoid empty commitment

Make sure the host organisation will permit your voice to be heard.

9. Submit comments in writing

Written comments cannot be ignored or forgotten.

10. Be there!

Standards have a huge impact on consumers. Who better to write them than you?

Sources of further information

The consumer and standards - Guidance and principles for consumer participation in standards development

This brochure from ISO-COPOLCVO outlines the meaning and essential elements of consumer participation, including an overview of standards development procedures, as well as the history of consumer participation in standards work. Criteria for setting consumer priorities are provided, together with the priority areas selected by COPOLCO. Relevant ISO/IEC guides, International Standards, and other publications are also referenced.

www.iso.org/iso/en/prods-services/otherpubs/pdf/standardsandconsumer.pdf

UN Guidelines on Consumer Protection

www.un.org/esa/sustdev/sdissues/consumption/cp1225.htm

Consumers International position papers

CI has a number of its position papers that identify the consumer interest in specific standards projects it is engaged on. These can be accessed at:

www.consumersinternational.org
Programmes section, then to Technical Standards

ANEC Position papers

ANEC, the European consumer voice in standardisation, maintains a website where it presents its position papers and other documents that help identify the consumer interest on specific issues.

www.anec.org

Appendix

National case studies

Organisation Name	Case Study Topic
Association des Consommateurs du Mali (ASCOMA), Mali	Voluntary standards and the importance of consumer support
Consumidores Argentinos, Argentina	Standard setting processes: Domestic electrical appliances
Consumidores y Usuarios Asociados (CUA), Uruguay	Pesticide Standards Case Study
Edward Groth, United States	The Administrative Procedures Act in the United States
Sdružení českých spotřebitelů/Czech Consumer Association, Czech Republic	National decision-making processes and interests in the sector of foods
Voluntary Organisation in Interest of Consumer Education (VOICE), India	Standard setting for bottled water in India
Yayasan Lembaga Konsumen Indonesia (YLKI), Indonesia	Standard setting for processes in Food
Zambia Consumers Association (ZACA), Zambia	Decision making process, Zambia Bureau of Standards