



**Confederation of the European
Bicycle Industry**

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Since 1960 Representing the European Bicycle Industry

CONEBI's Feedback to Roadmap for EU Standardisation Strategy

CONEBI represents the European Bicycle, Pedal Assist E-Bike, Parts & Accessories Industries via its 15 national industry members. In the EU there are about 1,000 companies in this industry, many of them being SMEs, providing more than 155,000 direct/indirect jobs. The European Bicycle Industry brings value to the European economy in terms of jobs, investment, entrepreneurship and innovation. Plus, our environmental footprint is a net positive when it comes to the Green Economy. Local production in EU/UK results in a reduction exceeding 2-million tons of CO₂ emissions per year thereby offering an important contribution to reaching the Green Deal objectives.

The European Bicycle Industry is actively participating in national, European and international standardisation bodies to develop relevant standards and update existing ones where needed. Thereby the industry is contributing towards safe products being placed on the EU internal market. These efforts have also been recognized by the European Commission as several bicycle related standards are officially recognized in European legislations including the Machinery Directive¹ and the General Product Safety Directive (GPSD)².

The Machinery Directive is of high importance to the EU Bicycle Industry as it legislates the essential health and safety requirements relating to the design and construction of electrically power assisted cycles (EPACs). The widely-accepted standard EN 15194:2017 – the first version of which had already been developed more than a decade ago by the Bicycle Industry and was published in 2009 – is harmonized under the Machinery Directive. Additional standards are currently being developed within CEN TC 333 with a clear intention to be harmonised with the Machinery Directive, for example FprEN 17404 for EPAC mountain bikes as well as an EN standard for carrier cycles (commonly known as cargo bikes).

Furthermore, the GPSD ensures that products placed on the EU internal market are safe. Both conventional bicycles as well as several bicycle parts and accessories such as luggage carriers and child seats are covered under this legislation and their respective standards, for example the well-established ISO 4210 series, are developed within ISO TC 149 and are officially recognized as meeting the requirements of the GPSD.³

¹ Directive 2006/42/EC on Machinery

² Directive 2001/95/EC general product safety

³ Commission Implementing Decision (EU) 2019/1698

In addition, the Bicycle Industry was actively involved within CLC TC21X in the development of a European safety standard about secondary lithium batteries for light EV applications including e-bikes, namely EN 50604-1, which has recently been amended to include the latest knowledge.

Also, the European Bicycle Industry was the driving force to develop usage categories for the classification of bicycles, which have been published in EN 17406. Dedicated, readily understandable icons indicate to the end customer for which riding purpose the bicycle is intended to ensure safe usage. These categories range from commuting to leisure with moderate effort to extreme sports.

Due to the Bicycle Industry's international outlook and European products being sold across the globe, we would like to stress the importance of having international standards. International standards present the highest coverage of countries and are therefore also more widely recognised outside the EU. Thus, it is important that Europe is also active in international standardisation. This will make sure that Europe continues to be seen as the leader of high quality and safe products, while also creating a level playing field for the European Bicycle Industry that is strongly committed to being an active participant in the various international standardisation bodies while putting an emphasis on sustainable manufacturing in Europe.

Looking at European standardisation, we acknowledge that European standards reduce barriers to trade in the internal market, reduce risks, contribute to improving product quality and consumer safety as well as environmental performance. But above all, European standards contribute to legal certainty, especially in the case of harmonized standards.

While overall European standardisation is highly appreciated, there are also some aspects worthy of improvements, which could be addressed in the European standardisation strategy. We agree that the standardisation work should become faster and more efficient. However, it needs to be ensured that increasing the speed of the process does not compromise its quality and effectiveness. That being said, the consensus based system with many experts is very good, necessary and valuable to reflect the best "state of the art". Process times could be shortened to speed up the process. Furthermore, the administrative procedures linked with development and recognition of standards in support of European legislation could be simplified.

It is important to have dedicated standards for new and fast developing products and also to address rapid market or legislation changes in existing standards. This could possibly be achieved through improved coordination, cooperation and updated processes between the European Standardisation Organizations (ESO) and the European Commission as the requesting institution. In concrete terms this would mean that the EU Commission would formulate the actual policy objectives as concretely as possible, while the ESO would be more flexible and eager to anticipate and process regulatory changes in advance in coordination with the EU Commission, to analyse the need for developing new or amending existing standards. To this end, the standardisation requests should be clearly defined and HAS consultants should be included in the standard developing process, in particular if harmonization with EU legislation is envisioned, to align the process.

Overall, CONEBI welcomes the efforts of the European Commission to update its standardisation strategy due to the high importance that standards play in putting safe products on the EU internal market. As such, the European Bicycle Industry with its expertise in national, European and international standardisation bodies would be happy to advise the European Commission further on this topic.