

Participation of OSH stakeholders in standardization

Colloquium to mark KAN's 15th anniversary 1994-2009



PUBLICATION DETAILS

The "Commission for Occupational Health and Safety and Standardization (KAN)" project is financially supported by Germany's Federal Ministry of Labour and Social Affairs.

KAN Report 45

Published by Verein zur Förderung

der Arbeitssicherheit in Europa e.V. (VFA)

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Köllen Druck + Verlag GmbH, Bonn

ISBN 978-3-88383-826-7 **Online ISBN** 978-3-88383-827-4

- March 2010 -

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FOREWORD

Norbert Breutmann

Chairman of KAN
Confederation of German Employers' Associations,
BDA



Access to and participation in standardization are the subject of much debate amongst those involved in standards policy. With human and financial resources ever scarcer, the stakeholders in standardization processes are finding it more and more difficult to assign experts to represent them on the standards committees. Without active involvement, the risk is that key stakeholders will increasingly be edged out into an onlooker and consumer role. They would then be forced to accept the results produced by others. The trend is being compounded by the increasing internationalization of standardization. However, it is vital that all parties concerned are adequately involved in the drafting if standards are to enjoy a good reputation and if they are to have legal effect.

To mark its 15th anniversary, the Commission for Occupational Health and Safety and Standardization (KAN) is holding a colloquium on this controversial standards policy issue. Participants will hear about the latest developments at European and national level and be invited to discuss the consequences for occupational safety and health and to develop proposals for solutions.

15 years of KAN means 15 years of active participation in the standardization process, not just nationally but also, and increasingly, in the European and international arenas. That participation also encompasses processes over which it is unlikely that OSH stakeholders would normally have any significant influence if an institution such as KAN did not exist. As well as commenting on draft standards, KAN has also undertaken indepth examinations of all issues concerning OSH-related standardization in its 15 years of existence, leading to numerous KAN publications and online tools that enjoy an excellent reputation amongst experts.

Important studies conducted in the past include those on generic standards, agricultural machinery standards, the new Machinery Directive and the ergonomics modules, to name but a few. By setting up NoRA and EUROSHNET, KAN has created valuable tools for users. Were it not for the dedicated work of KAN and the groups it represents, the diligent employees at the secretariat and the creativity and expertise of the organizations that conducted the various projects, these standardization-related fields would probably not have been assessed in such depth.

Simplistic though it may be, this description of just a few of KAN's tasks reflects its main task, i.e. to ensure, through adequate involvement of the OSH stakeholders in standardization, that standards continue to provide a high level – and to increase the level – of protection.

One of the reasons for founding an institution such as KAN was the requirement in the Machinery Directive that the social partners, i.e. the employers and employees, be adequately involved in the standardization process. This requirement was reinforced in the amended Machinery Directive published in 2006.

Each state is free to choose how it wishes to go about meeting that requirement. But Germany's experience shows that opting for the institutional route in the form of KAN was the right thing to do and an important move. Nonetheless, even 15 years after KAN's inception, there are still unanswered questions concerning stakeholders' participation in the standardization process. One such question is which groups have to be involved, another is what form the participation process should take. The latter will have a direct impact on KAN's future tasks as well as being closely connected to the political priorities pursued by OSH stakeholders through standardization.

I thus hope that this colloquium can help resolve these aspects and provide impetus for KAN's future profile. This report contains statements by the various players as preparation for and an introduction to the event.

May KAN continue its successful work in the future.



Colloquium on "Participation of OSH stakeholders in standardization"



Findings of the European "Access to standardisation" study

Koos van Elk EIM Business and Policy Research

"Access to standardisation" is a European study, which was commissioned by the European Commission. Its aim was to determine whether there was a discrepancy between the stated aims of openness and transparency and the actual conditions facing stakeholders. The study set out to ascertain the extent to which the European system of standardization can ensure adequate participation of all stakeholder groups. It was also intended to identify ways in which access conditions might be improved.



The study looked both at access to the standardization process and to standards documents. It considered the opinions of European standards organizations, stakeholder groups and national standards organizations.

Main findings

The standards makers feel that enterprises are very involved in standardization and have the expertise necessary for effective participation. Authorities are rated highly for their dedication, universities and research institutions for their expertise. Consumers, environmentalists and trade unions are given quite low ratings in both categories. Enterprises, authorities, universities, consultants and certifiers judge their own awareness of standardization as relatively high. The consumers', environmental organizations' and trade unions' self-assessment on this point is not as positive. Furthermore, trade unions and environmental organizations do not believe standardization can help them a great deal in achieving their objectives.

The main reason that stakeholder groups participate in standardization is to avoid potentially disadvantageous content in standards. Or, put positively, their main aim is to ensure that aspects they consider important are incorporated into standards in a suitable manner. The negative or defensive stance is particularly common among trade unions.

The surveys show that the stakeholder groups do not actually see any major obstacles to participation in standardization. On a scale of 1 (= no obstacles) to 5 (= major obstacles), authorities and enterprises give an average rating of 2.7. The obstacles are biggest from the perspective of consumers and environmentalists (approx 3.7).

Around half of the respondents feel that the main obstacles are internal; the other half see the primary barriers as being the structure and processes of the standardization system. For the trade unions, the difficulties are predominantly external.

The most significant obstacles to participation are:

- required time: (very) important for 66% of the respondents,
- travel expenses,
- cost of participation in technical committees (fee) and
- cost of membership of a standards organization (fee).

The three most significant obstacles to standards being applied are:

- price of standards: cited by 52% of the respondents,
- cost of implementing standards and
- number of cross-references in standards.

The most-cited advantages of standards are:

- compliance with legislation,
- compliance with customer requirements,
- state-of-the-art products and services,
- clear and unambiguous communication with market players,
- product compatibility,
- environmental aspects and
- better reputation of products and services on the market.

Key conclusions

Although it is difficult and expensive for individual SMEs to participate in standardization, they are relatively well represented on the technical committees. This is chiefly because Europe has 500 times more SMEs than large enterprises. The report underlines that it is essential to pool interests and that the representative organizations should carry appropriate weight (costs could be divided within a large group).

The study revealed that, in particular, consumer and environmental organizations and trade unions had a very low level of representation in a number of countries. To close this gap at the European level, the European Commission decided some time ago to provide financial support for organizations such as ANEC (consumers), ECOS (environmentalists), NOR-MAPME (SMEs) and ETUI (employees). However, the study concludes that this representation of interests at the European level is not consistent with the standardization model based on national representation.

Recommendations by the study's authors

The following recommendations on how to improve access to standardization have been taken from the "Access to standardisation" study. They reflect the opinion of the study's authors and not necessarily that of the European Commission, for which the study was carried out.

Recommendation 1

European policy initiatives aiming at increased access to standards need to take different shapes because of the different organisational structures and different business models in the various Member States. These differences hamper the development of a harmonised European policy. We therefore recommend striving for more uniform organisational structures and business models of the National Standards Organisations as a prerequisite for more efficient and effective European policy making in the area of access to standardisation.

Recommendation 2

Seriously consider the relationship between the standards organisations and the European Institutions and the procedures for the development and distribution of standards used for two different purposes: standards initiated and mainly paid for by private enterprises and standards that are used to bring about public policy goals and that are partly paid by public money.

The recommendation is to develop all standards within one system, but adjust procedures and conditions of access for harmonised standards (e.g. lower prices for EU harmonised standards, see Recommendation 13).

Recommendation 3

Improvement in access to and actual participation in standardisation must not only be achieved by reorganising business models of standards organisations, but also by fostering the organisation of the relevant stakeholder interest to allow meaningful participation. This holds for representation of interests outside the business community as well as for the business community: efforts to increase the representation of SMEs in standardisation should be aimed at organisations of SMEs such as trade associations and professional organisations.

Recommendation 4

The contradiction between the system of national delegation and the efforts to have specific interests represented at European level with the support of the European Commission should be gradually resolved, either:

- by promoting the access to the standards making process at the national level for other stakeholders than the traditionally strongest stakeholders such as large enterprises; or:
- by gradually dismantling the system of national delegation and moving towards a truly European system, in which a consensus between the various interests is actually developed and obtained at the European level.

Recommendation 5

If other membership organisations do exist that claim to represent the same interest as the one organisation selected by the Commission to receive financial support to represent that interest in European standardisation, the position of that organisation may be disputed.

There are two options to arrive at a solution:

- the policies to support the participation of stakeholders should aim to improve framework conditions rather than support directly individual organisations;
- any direct support should preferably be to all existing membership organisations, representing the European stakeholders, not just one.

Obvious a proper mix between these options might result for an exploration by the standards bodies, the Commission and interested parties.

Recommendation 6

More support to training and information campaigns on standardisation issues would be most welcome. This holds for courses aimed at specific target groups among stakeholders such as SMEs or consumer associations, as well as for improving the position of standardisation in regular education such as - but not limited to - regular vocational education and academic curricula.

Recommendation 7

Monitor continuously the possibilities to merge different institutions that cater for standardisation in different, but increasingly related fields of expertise (at national as well as European level) in order to reduce complexity and costs with a view to increase ease of access further.

Obviously within merged organisations there will remain a certain specialisation to cater for the different working areas.

Recommendation 8

The cooperation of standards organisations with a wide range of stake-holder organisations (whether business associations or special interest groupings) should be further improved in order to see to it that more relevant, more targeted information on standardisation reaches the stakeholders at grassroots level. In addition to reaching stakeholders adequately and efficiently with information, such cooperation may result in specific sets of standards to be composed and actually distributed among the target group.

Recommendation 9

To allow monitoring progress in increasing access to and actual participation in standardisation by the various types of stakeholders, the ESOs and NSOs should have a uniform registration of the participation of the various types of stakeholders in technical bodies, either by the number of organisations represented or by the number of experts participating on their behalf. A uniform classification of stakeholders is important to judge to which extent a balanced composition of TCs is indeed achieved in the various countries.

To also allow assessing the problems that still exist, they should also have a uniform complaints register with all National Standards Organisations.

Recommendation 10

It should be further encouraged that public enquiries are indeed published widely and that stakeholders not (yet) participating in standardisation are indeed reached. The NSOs should be more proactive in obtaining comments from a wide range of stakeholders during the public enquiry. Just a reference in the State Gazette might not suffice.

Recommendation 11

In designing the various communication tools used by standard organisations – and stakeholder groups for that matter – the need to make these communication tools accessible for people with impairments should be better taken into account.

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Recommendation 12

The use of ICT tools should be further encouraged in

- Organizing the standards developing process
- Distributing information on the standards documents
- Distributing the standard documents themselves
 In fostering this, good practices that exist with several NSOs might be a useful instrument.

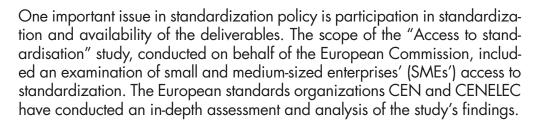
Recommendation 13

For European harmonized standards (cf. Recommendation 2), that are closely linked to legal requirements, the aim should be to make the standards available for free on the Internet. This obviously brings with it the need to make available alternative sources of finance in order to avoid that as a consequence participation in the standards development process will become much more expensive in order to maintain the economic viability of the standards organisations.

"The decentralized European standardization system and the principle of national delegation have proven their worth."

Ernst-Peter Ziethen Comité européen de normalisation (CEN)

The political sphere affords considerable attention to standardization. Its importance is reflected in the Communication adopted by the European Commission on "the Role of European Standardisation in the Framework of European Policies and Legislation" (2004), the Communication entitled "Towards an increased contribution from standardisation to innovation in Europe" (2008) and the Conclusions of the European Council of 25 September 2008 on standardization and innovation. In DIN's view, these conclusions are generally positive. The Council supports key objectives set by the Commission but its focus is different when it comes to the measures to be derived from those objectives.



Some of the underlying principles of the European standardization system were called into doubt in the study and in the position put forward recently by the European Parliament with regard to the new EU Construction Products Regulation. The study concludes that there is a "contradiction between the system of national delegation and the efforts to have specific interests represented at European level with the support of the European Commission" and that new forms and possibilities of involvement are thus necessary. The Parliament's position on the new EU Construction Products Regulation also calls for changes to the European standardization system, with the aim of ensuring equal involvement of all stakeholder groups. One proposal is that the standards bodies could allocate "participation quotas".

However, these plans and calls fail to recognize the advantages of the decentralized European standardization system and the principle of national delegation. Established processes ensure the opinions of all stakeholder groups in the Member States are taken into account in standardization work. The process of forming a national opinion enables even those partners whose economic strength is relatively low to make an efficient contribution to standardization, in their native language.



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The standards are prepared by the parties who will be using them, with the result that they take care to ensure they are understandable, concise and practicable. The financing model is considered fair because those parties that gain economic benefit from the standards finance them. The decentralized standardization structure means the European countries have 30 votes at ISO and IEC. If there were only one central, European standards body, however, it would have one single vote. Moreover, national standards organizations ensure efficient standardization work and make sure their national body of standards is consistent whilst also taking into account the requirements of the harmonized European standards.

These principles are cornerstones of the European standardization system. Balanced representation of interests in the standards committees is key to ensuring the democratic legitimacy of standards. Where there are differences of opinion as to the appropriate composition of a standards committee, it is always possible to ask the Technical Board (BT) to intervene. The fact that this possibility has rarely been used so far indicates there is no need for action in this respect.

CEN and CENELEC firmly reject the study's call for free standards. The fact that standardization activities are financed through sales of standards is a key pillar of Europe's strong standardization system. There do not appear to be any realistic alternatives. A survey conducted in Germany by the Technische Universität Berlin and the Fraunhofer Institute for Systems and Innovation Research at the end of 2008 showed that standards prices were not among the reasons why SMEs did not get involved in standardization. Instead, efforts to make SMEs more aware of the benefits and strategic potential of standardization need to be stepped up. Good search tools and comprehensible, practicable content, which the stakeholders help develop via the national mirror committees, are also necessary.

A constructive dialogue is now planned with everyone involved in standardization in an attempt to find ways of mastering the challenges posed to European standardization by the ever-changing business world.

Results of the study on "Measures to support SMEs in their use of standards and their participation in standardization"

Dr Martin Fornefeld MICUS Management Consulting GmbH

SMEs often find it difficult to filter the flood of information with which they are faced, to find the standards relevant to their sector and to judge the significance of those standards for their own field of work. At the same time, SMEs are less involved in standardization than larger enterprises.

Germany's Federal Ministry of Economics and Technology thus commissioned a study to analyze the issue and draw up policy recommendations to help SMEs use standards and get them more involved in standardization processes. The study identified seven action areas, as follows:

- 1. Above all, SMEs associate standards with high costs and administrative effort. They are not adequately aware of the business advantages and the existing possibilities for participation in standardization processes. An awareness campaign could tackle this problem. It is particularly important that the *amount of information*, advice and training offered be increased. It is recommended that the existing network of advisors at the chambers of crafts and trades ("Handwerkskammer") and trade associations be strengthened and more use made of existing advice and training programmes aimed at SMEs.
- 2. Businesses would like to see *vocational schools and universities teach their students more about standards*. It is therefore recommended that this be made a requirement in the training plans. At the university level, a particular effort should be made to expand the activities of the DIN university network and the DIN "Young Science" Award.
- 3. Previously, the German standardization system did not have a body that specifically represented SMEs' interests. The creation of the "Kommission Mittelstand" (SME commission or "KOMMIT") at the beginning of 2009 was an important step towards such representation. It is recommended that the operational function of this commission, which currently plays a purely strategic role, be enhanced. It should be SME's central point of contact at DIN and inform them about new applications for standardization, draft standards and withdrawn standards. It should also track SME-related indicators and use them to evaluate the effects of SME support measures in the standardization sphere.



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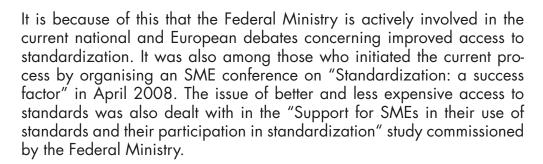
- 4. The standards drafting process should seek to **ensure simple and understandable texts** in future. Overlaps between technical rules and legislation on the one hand and standards on the other should be reduced and, in future, prevented.
- 5. SME's scarcely use the possibility of *direct participation* (in a working group) or *indirect participation* (in the form of commenting during the public enquiry stage). Micro-enterprises, which only use standards, mostly tend to want to be indirectly involved in standardization by means of commenting. It is therefore recommended that the planned online commenting portal for draft standards be finished as soon as possible. The possibility of setting up an SME fund for individual financial support of SMEs that are interested in being directly involved in a working group but opt not to do so for cost reasons is to be explored. Where trade associations are currently not involved in standardization, incentives are needed so that they ensure their members' interests are taken into account.
- 6. In view of the SMEs' and associations' criticism of the prices for standards and the European Commission's call for the cost of standards to be reduced, it is recommended that the DIN and DKE pricing and licensing models undergo a critical review and be aligned with one another.
- 7. An analysis of the existing support programmes in the area of standardization shows that a variety of German ministries are active (e.g. through support for individual standardization projects and financing of standards committees). To ensure a harmonized approach, it is recommended that standardization coordinators be installed at all of the ministries concerned and that the departments regularly coordinate their activities.

The measures suggested here are intended to help improve the way in which standardization is perceived in Germany and to boost the network among the central standardization players. They also aim to support micro-enterprises in their efforts to find, obtain and use standards and participate in standardization processes.

"Germany's Federal Ministry of Economics and Technology is actively involved in and stimulates the current national and European debates concerning improved access to standardization."

Norbert Barz Federal Ministry of Economics and Technology

Inclusion of all stakeholders in the standardization process is one of the main cornerstones of standardization work, which is why the Federal Ministry of Economics and Technology promotes and endorses such inclusion. After all, it is the basis upon which the democratic legitimacy of the standardization process rests. The task of including stakeholders in standardization work also and especially involves making sure small and medium-sized enterprises participate. At the same time, access to standards needs to be as simple and inexpensive as possible, particularly in view of SMEs' needs.



Other studies (most recently the "Survey on access to formal standard information, the application of formal standards, and participation in formal standardization" conducted by the Technische Universität Berlin/Fraunhofer Institute for Systems and Innovation Research on behalf of the German Engineering Federation (VDMA) and the German Electrical and Electronic Manufacturers' Association (ZVEI)) have revealed that the main obstacles to better involvement of SMEs in standardization are felt to be the time and resources required to prepare standards. According to these surveys, the cost of purchasing standards is of minor significance.

Consequently, when considering access to standards and standardization, a distinction has to be made between involvement in preparing standards and access to the results of standardization work, i.e. the actual standards themselves. The Federal Ministry's measures and plans to promote improved access to standardization for SMEs take a holistic approach. Having said that, since standardization is a private-sector activity, the Federal Ministry sees itself merely as one player, albeit an important one, among many parties responsible for the process.



Specifically, the Federal Ministry has initiated and supported various measures in collaboration with the DIN. At the SME conference on "Standardization: a success factor", for instance, delegates were able to find out more about the issue of including SMEs in standardization and to discuss SMEs' needs. The dialogue embarked upon there was given an institutional form by founding the "Kommission Mittelstand" (SME commission or "KOMMIT") at DIN in February 2009. KOMMIT is intended as a platform for SMEs' interests in the field of standardization and as a means of supporting the DIN Presidial Board in its efforts to ensure SME-friendly standardization. In addition, KOMMIT has already set up a working group to look at the financing of standardization and the repercussions for SMEs. With regard to these questions, the Federal Ministry feels the system of financing standardization mainly through sales of standards should definitely remain in place until comparable alternatives with longterm prospects are found. Proposals to move away from the current form of financing need to consider the consequences and questions such as whether stronger governmental influence on standardization, which is a task performed independently by industry, is desired.

In addition, the Federal Ministry firmly supports and welcomes the activities undertaken by DIN to aid SMEs in the field of standardization. These include the provision of tables of standards' contents free of charge, the launch of a "draft standard portal" that enables the contents of draft standards to be viewed and commented at no charge and the introduction and use of "virtual standardization meetings". In the view of the Federal Ministry, SMEs in particular can benefit from these measures as they make it easier to find standards/content in standards and reduce the number of "mispurchases", ensure stakeholders are more involved in the draft phase and highlight methods of saving time and money in standardization work.

Though these measures are to be welcomed, the way in which standardization in Germany and Europe is organized is still subject to a process of constant change aimed at making standardization even more SME-friendly. The Federal Ministry is thus calling upon the standards organizations – echoing the political demands at European level – to boost efficiency and cut prices on a large scale and to take steps to facilitate access to standards and standardization. The "Support for SMEs in their use of standards and their participation in standardization" study, which was commissioned by the Federal Ministry and is now completed, provides some ideas, which should be assessed in the near future to determine whether they can be translated into practice.

"The consensus-based, voluntary standardization process provides the basis for trust, acceptance and reliability."

Dr Ulrike Bohnsack DIN German Institute for Standardization

Stakeholder participation in standardization

Transparency, involvement of all stakeholder groups and consensus are the hallmarks of standardization activities at DIN. The aim is to simplify access to standardization, i.e. participation in the drafting of standards, and to the content of standards for everyone.



Access through trust

The consensus-based, voluntary standardization process provides the basis for trust, acceptance and reliability. This principle has applied to DIN since its establishment in 1917 and is laid down in the 1975 partnership agreement between the Federal Republic of Germany and DIN. One particularly important factor in the process is the inclusion of SMEs. To increase their degree of inclusion still further, DIN set up the "Kommission Mittelstand" (SME commission), which deals with various issues, among them easier access to standardization for small and medium-sized enterprises (SMEs).

Access through transparency

The stakeholders' trust was secured by means of ongoing improvement of quality and increased productivity (including shorter standardization workflows). The work processes are constantly optimised to ensure the work is completed on time.

Access to opportunities for involvement

German experts are extremely willing to entrust DIN with project-management responsibilities in European and international standards committees. Many of the other standardization institutes and experts from other nations also firmly support DIN's project-management work. In recent years, the number of experts on standards committees was increased. To help new, external members of DIN committees, we are producing an information package and e-learning modules. In the current economic climate, the cost of standardization work is particularly relevant. The introduction of web conferences is helping to cut costs as well as making it even easier to get involved.

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Access to new findings

When it comes to the marketability of innovative products and services, the standardization aspect must not be neglected. The "Innovation with norms and standards" initiative, which is financially supported by the Federal Ministry of Economics and Technology pursuant to a resolution passed by the German Bundestag, aims to make the research, business and political spheres more aware of standardization's potential. Its goal is to ensure swifter dissemination of research and development findings through standards in pioneering key technologies.

The "Research and development phase standardization" (EBN) group has been involved for many years in research projects commissioned by the Federal Government, the European Commission and other organisations in a wide variety of research and development areas. A new project by the Federal Ministry of Economics and Technology, entitled "Transfer of R&D findings through standardization", will make it easier to apply research findings as well as cultivating the knowledge network among the experts on the committees. The process of incorporating R&D findings into standards and DIN SPECs will help ensure products and services are provided and well-received on the market.

Access to standards' contents

A considerable amount of information about the standards (e.g. standard number, title, date of publication and table of contents) is available on the internet and in the introductions in the "DIN-Mitteilungen" bulletins. Work is currently underway on further improvements, such as an electronic portal for presenting the contents of draft standards free of charge during the public enquiry stage. In addition, the "DIN-Mitteilungen" introductions will be available for free on the internet at www.mybeuth.de as of the end of 2009.

Access to customers

As well as standards and DIN SPECs, there are various types of publication (DIN Handbooks with standards in a particular field, specialist books with standards and explanations, loose-leaf booklets with standards, notes and regulations, online services on specialist areas on the internet, etc.) that give customers a comprehensive, inexpensive insight into specific fields.

Direct access to global data

DIN Software GmbH's products enable our internal staff and any expert to obtain the information they need concerning standards, technical rules and regulations. Over 300,000 documents from almost 300 publishers are available.

"We need to step up our efforts to devise and implement joint solutions to ensure the participation of OSH stakeholders in the standardization process and effective representation of OSH interests. These points in particular will form an increasingly important task for KAN in the future."

Michael Koll Federal Ministry of Labour and Social Affairs

The "New Approach" in European single market directives (which has since evolved into the "New Legislative Framework") has lent standardization central significance in terms of product safety and thus occupational safety and health, owing to the presumption of conformity provided by harmonized standards. It is therefore important that the standardization process should include both those who bear public responsibility for occupational safety and health (the federal government and the federal states) and those who use the products manufactured in accordance with those standards (social partners). Against this backdrop, "participation in standardization" means helping to formulate the content of standards and thus to improve product safety in line with practical needs. It also entails preventing undesirable developments through active and constructive involvement.

In Germany, the foundations for widespread participation in standardization and for efficient and effective representation of a joint OSH stance were laid in 1994 when KAN was created. From the government perspective, KAN has proved a resounding success as the central forum in which OSH stakeholders form their opinions. This has made it substantially easier to ensure the voice of OSH is heard and acted upon in the standardization process.

As a member of the Committee for Technical Work Equipment and Consumer Products (AtAV), KAN advises the Federal Government on product safety matters. This set-up was specified in the 2004 Equipment and Product Safety Act (GPSG) and again brings together legal safety requirements, standards and OSH requirements. As an increasing number of products are used both commercially and privately ("migration products"), the question is how the safety aspects of such products can be incorporated into KAN's scope of activity.

A factor that is at least as important in OSH and standardization as the legal framework is market surveillance. The authorities responsible for surveillance frequently learn of unsafe products and standards that do not meet the essential safety requirements set out in the European direc-



tives. This is where the active cooperation between the federal states and KAN comes into play – a long-established system that was strengthened in various product segments by a co-operation agreement concluded between the two sides (with the states represented by the Laender High Joint Committee of Labour Inspection Services (LASI)) in 2003. To intensify the links between OSH and standardization still further, the federal states and KAN have already successfully staged numerous joint information events.

At its meeting in April 2008, LASI recognised that it was necessary, in principle, for the federal states to be involved in standardization but that capacity constraints made it impossible to guarantee their constant involvement in the standards committees. Consequently, LASI supports KAN's work and feels that, at least, involvement in selected standards bodies is necessary.

Furthermore, the public sector (Federal Ministry of Labour and Social Affairs, Federal Institute for Occupational Safety and Health and the federal states) uses KAN, along with the other OSH stakeholders, as an information and discussion forum (for topics such as ergonomics standardization, OSH management systems and risk evaluation). KAN has become an important, established partner for the authorities at national and federal-state level when they take joint action to lodge a formal objection against a harmonized standard.

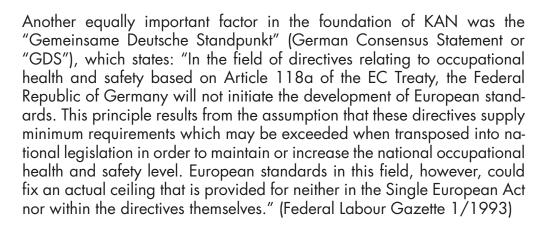
In recent years, the priority task has been to strengthen the influence of OSH stakeholders on standardization at the European level. As markets have become more globalized, standardization has naturally become more international, presenting new challenges with regard to OSH involvement. We need to step up our efforts to devise and implement joint solutions to ensure the participation of OSH stakeholders in the international standardization process and concentrated, effective representation of OSH interests. These points in particular will form an increasingly important task for KAN in the future.

In the face of EU expansion and the internationalization of standardization, there is also a need to evolve Germany's position on the role of standardization in safety and health of workers at work. Initial discussions have shown that KAN will play an increasingly important role in this area too in the future.

"It is important that there are no additional direct or indirect burdens on employers and companies as a result of misdirected standardization activities."

Norbert Breutmann Confederation of German Employers' Associations (BDA)

By setting up KAN, the Federal Government sought to comply with the 1989 Machinery Directive requirement that the social partners (including the employers) should be given the possibility of influencing the preparation of harmonized standards and the monitoring of existing harmonized standards at the national level.



The task of representing these positions was quickly followed by another: pooling and coordinating OSH interests prior to the drafting of generic safety standards. This move was triggered by the lack of a clear line in the individual comments expressed by the wide variety of OSH stakeholders involved, which meant that contradictions could not be ruled out. KAN's work in this area significantly boosted the efficiency of the comments procedure.

In the future, thought will have to be given to how KAN's tasks can be adapted to the changing business world around the globe. One question to be considered, for example, is how the German Consensus Statement will evolve to reflect international standardization. How these factors develop will have a major impact on employers' involvement in KAN's work but also on their participation in the standardization process. Whilst it is true that employers' involvement is mainly driven by OSH matters, as a reflection of their acknowledged responsibility towards their employees, as key market players they also consider it important that there are no additional direct or indirect burdens on employers and companies as a result of misdirected standardization activities. The BDA rejects national go-it-alones (e.g. with regard to the safeguard procedure) and exaggerated OSH requirements in standards since they thwart German competitive-



ness. As Alexander Gunkel, a member of the BDA management board, put it on the occasion of KAN's 10th anniversary, "In the view of the BDA, one of the important functions of KAN is to oppose overregulation of occupational health and safety, and thereby to help achieve the much-needed reduction in German bureaucracy. Deregulation leads to greater transparency and ease of use, and thus has a direct bearing upon the competitiveness of the German economy..."

Standards must not be allowed to address employers' duties, employees' rights and duties and organization in the area of health and safety of workers at work. These aspects are governed by exhaustive, binding regulations. Another factor that sometimes causes incomprehension among the industry representatives involved in standardization is the occasional conflict of interests between the vendors and users of work equipment when it comes to specifying the detailed requirements concerning the characteristics of the products.

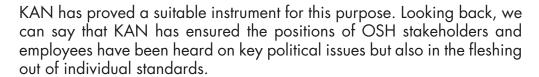
Employers who operate or use standardized products or services have traditionally been less involved in the standardization process than manufacturing enterprises. Realistically, that is not likely to change in the future with the exception of areas such as ergonomics standardization. It will therefore be increasingly important that KAN performs its tasks with a sense of proportion, bearing in mind the impact on enterprises' profitability and the need for simple, smooth and safe operation.

German employers are certain KAN will continue to be a key player in national and European standardization, as well as, increasingly, international standardization, thus directly representing the interests of its members, including the employers. The latter will continue to participate in KAN's work on an appropriate scale as they have done in the past.

"KAN provides employees with an instrument through which they are at least indirectly involved in standardization. Nonetheless, the trade unions expect more support, particularly in the European context."

Marina Schröder German Trade Union Confederation (DGB)

Fifteen years of KAN means fifteen years of support for the social partners in the field of standardization. By setting up the Commission in 1994, Germany sought to comply with the requirement stipulated in two European directives that the social partners' ability to influence standardization at the national level should be improved. The German trade unions saw this as an important, initial step towards their long-established aim of democratizing standardization.



However, fifteen years on, the limitations of this approach have also become clear. Since standards were assigned a special role in legislation as a result of the "New Approach" in the middle of the 1980s, the trade unions have repeatedly pointed to the immanent obstacles that the standardization system poses for weak stakeholder groups. The main challenges to true participation in standardization lie – and will continue to lie – in the need for financial and institutional support for employees and trade unions.

The fact that at least draft standards are now provided free of charge in some cases has been a great help. However, the problem of finished standards having to be purchased remains unsolved. This system is acceptable when standards serve as a means of communication and rationalization for private-sector players, but it is not acceptable for standards that are commissioned by the public sector and funded by the public purse. Standards that supplement political objectives and legal requirements must be available free of charge and easily – just as the legislation itself is.

As with access to the standards documents, a distinction also has to be made when it comes to access to the standards committees. It is all well and good to point out that the standards committees are naturally open to all interested groups but the standards institutes' fees are a considerable obstacle to membership. On top of that, there are working hours and travel expenses to be paid. Such costs have to be paid for by public money if employees are to represent their public interest in standardization and



if they are to contribute their expert knowledge – to ensure credible and practical standard content. Several years ago, the European Trade Union Institute began surveying the operators of machinery with high accident rates in order to gain feedback from the workplace and thus to improve the machinery and the standards applied in its production. This is a laborious process – and one that has won acclaim among politicians and standardizers – but it is necessary because many standards bodies do not give sufficient consideration to how their products fare at the workplace. Steps need to be taken now to point the way forward to ensure that these one-off solutions do not remain isolated cases.

KAN provides employees with an instrument through which they are at least indirectly involved in standardization. Nonetheless, the trade unions expect more support, particularly in the European context. It would be helpful if other European countries had institutions like KAN too and the individual Member States ensured that the social partners and trade unions were included in standardization work in an effective manner. We expect the European Commission to step up its efforts to attain its political goal of improved involvement of social partners and to provide the Member States with more support where necessary.

Limiting such solutions to the national level is an inadequate approach. An institution such as KAN witnesses the limitations of national participation when the actual decisions concerning standards are taken at the European level. DIN has safeguards for minority groups to ensure that a key stakeholder group cannot be outvoted but CEN does not. The trade unions call for the same system for European votes to prevent private-sector concerns overruling public interests when it comes to harmonized standards. And if standards deal with occupational safety and health, the persons ultimately affected, i.e. the employees, need to be guaranteed a privileged role as participants in standard-writing and decision-making at the European level.

"Standardization plays a pivotal role in accident insurance institutions' prevention activities. But it reaches its limits whenever social policy decisions are needed. In these cases, either the law makers or the statutory accident insurers' autonomous administration bodies have to specify criteria for abstract values such as workers' safety and health."

Dr Walter Eichendorf German Social Accident Insurance (DGUV)

Germany's statutory accident insurers and DIN – the German partner in European standardization activities at CEN/CENELEC and international activities at ISO/IEC – have been cooperating constantly and successfully for many years. Currently, some 450 experts from accident insurance institutions are involved in drawing up a high-quality body of safety standards. Almost 170 of those experts chair one or more standardization committees at DIN or, at the European and international level, serve as chairpersons or conveners of CEN/CENELEC and ISO/IEC committees. These figures indicate how significant participation in standardization is for the accident insurance institutions' prevention work.

We will continue to exert our influence on the standardization process, and will certainly intensify that influence where necessary, through the committed and pioneering work of our experts who are involved in standardization. Although product safety in its conventional form has already reached an exemplary level in recent years, in the world of technical development standing still is tantamount to taking a step backwards. Standards relating to the characteristics of technical products have to keep up with the tremendous pace of technical development and new safety features. Accident insurance institutions' involvement in this field will therefore not decrease in the future either.

But participation in standardization is more than just being a member of standards committees. Today's IT and communication platforms open up new ways of creating networks. Networked expertise is available around the globe and can help optimize processes, solutions and products quickly. Knowledge gaps that individuals cannot fill themselves can be resolved by means of networked knowledge. One such network is EUROSHNET, set up on KAN's initiative several years ago to facilitate cross-border exchange of expertise in practically all technical questions concerning product safety and standardization. This promising approach merits continuation and expansion in the future.



Nonetheless, standardization reaches its limits whenever social policy decisions are needed that cannot be made, or exclusively made, on the basis of technical factors. In these cases, either the law makers or, in the area covered by the statutory accident insurers, the latter's autonomous administration bodies have to specify criteria for abstract values such as workers' safety and health. That is why standardization in the field of safety and health of workers at work is not desired – apart from a few exceptions – and the accident insurance institutions reject the idea. This stance is reflected in the German Consensus Statement on standardization in the field of safety and health of workers at work, which was drawn up jointly by the government, accident insurers and social partners and is presently being updated and adapted to the developments that have taken place since it was published around 15 years ago. Moreover, and this fact is occasionally overlooked, the same stance is reflected in the European Union's Community law. For good reasons arising from the individual Member States' sovereignty in social policy matters, Community law makes a careful distinction between alignment of legislation concerning products and (undesired) complete harmonization in the realm of social policy. In the existing Community treaties, including the Treaty of Lisbon, the Member States reject a complete harmonization of European social policy. The treaties only include and govern standards (in their capacity as secondary Community legislation) that supplement Community law with regard to the characteristics of tradable products. In these cases, they also specify the mandates for dealing with the legal consequences of such standards and the instruments through which the standards are created.

Consequently, there is no legal framework for standardization of safety and health of workers at work at the present time. The Community treaties include instruments with which the European Commission and the Member States' regulatory authorities can control the quality and functionality of product standardization by means of safeguard clauses. As long as there is no legal framework and as long as the European law makers do not expand the Community treaties to include standardization in social policy areas as well, standardization comes to a dead end as soon as the safety and health of workers at work is affected. One of the accident insurance institutions' key expectations is thus that these social policy principles be respected in standardization activity.



Commission for Occupational Health and Safety and Standardization (KAN)

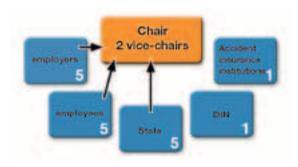


Composition of KAN

KAN brings together the institutions concerned with occupational safety and health (OSH) in Germany.

It is composed of five representatives each from

- the employers,
- the trade unions and
- the state (two representatives of the federal government and three representatives of the federal states' supreme OSH authorities),



Composition of KAN

plus one representative each from

- the DIN German Institute for Standardization and
- the Association for the Promotion of Occupational Health and Safety in Europe (VFA)/German Social Accident Insurance (DGUV).

With the Central Agricultural Social Insurance Fund (LSV-SpV) as a permanent guest, all statutory accident insurance institutions are thus involved in KAN's work.

KAN's chairmanship rotates every two years among the representatives of the employers, trade unions and the state. The funding of KAN is shared equally by VFA and the Federal Ministry of Labour and Social Affairs.

Article 5 (3) of Machinery Directive 98/37/EC calls for measures to be put into place to enable the social partners to exert influence on standardization. In Germany, this requirement was implemented by founding KAN. To provide additional support, two "social partner liaison offices", one each for employers and employees, were set up at the KAN Secretariat.

The KAN Secretariat

The KAN Secretariat supports the work of KAN by

- formulating comments on standards,
- designing, supervising and evaluating studies and expert reports that analyze various standardization fields,
- preparing KAN meetings and
- implementing KAN's resolutions.

The secretariat also addresses itself to the interested public and reports on KAN's work, holds seminars and conferences and promotes the exchange of information and views among OSH and standardization experts in Germany and Europe.



Public relations

KAN website

www.kan.de/en

The KAN website contains key information in five languages on KAN's structure, tasks and approach. It also includes important "basic documents" and news relating to its fields of activity. In the "Publications" section, visitors can download all of the documents published by KAN.



KANBrief

KANBrief is a quarterly round-up of news concerning KAN's work and trends in occupational safety and health and standardization (a list of the topics is provided on page 37). The print version (of which over 8,000 copies are produced) is published in German, English and French, and the electronic version is also available in Italian and Polish. Thanks to its multilingual nature, it raises awareness of the matters important to KAN not only in Germany but also abroad. KANBrief is available for free and has subscribers in 61 countries.



KAN Reports

KAN regularly commissions studies and expert reports aimed at providing an in-depth analysis of OSH-related aspects of standardization and identifying room for improvement in standards in specific fields. The findings are then published in "KAN Reports" (see list on page 38) and form the basis for recommendations that KAN adopts and draws on as input for its work.

KANMAIL

The KANMAIL e-mail information system supplies a summary of news from the world of OSH and standardization, in German, English and French, to around 3,000 readers in 44 countries.

NoRA - OSH standards search tool

www.nora.kan.de/en

Since it is virtually impossible to decide whether a standard is relevant purely on the basis of its number and title, KAN and DIN Software GmbH joined forces to develop a search tool. Dubbed "NoRA", it enables users to look for specific standards with OSH-related content. The tool's database, which is updated and expanded every month, currently contains information on more than 6,000 standards.



In addition to the "basic search" function (free text), there is an advanced search using twelve different fields (including document number, publication date, title words, abstract, application areas and hazards). As the search fields can be used in combination, the search can be restricted to specific OSH topics.

Two separate areas have been set up within NoRA to enable users to search for ergonomics standards (ErgoNoRA) and generic standards (QNoRA).

NoRA also contains a constantly up-to-date list of draft standards that are at the public inquiry stage.

EUROSHNET

European Occupational Safety and Health Network

www.euroshnet.eu



The EUROSHNET European communication platform, founded by KAN and other institutions in 2003, provides a forum that is uncomplicated yet ensures in-depth discussions concerning OSH-related topics in the realms of standardization, testing/certification and research. EUROSHNET users can find experts

on specific topics to talk about technical issues, exchange documents and thus to present a harmonized OSH position at the European and, increasingly, the international level of standardization. The site's home page provides general information on the network and access to the public and restricted areas.

The *Public Area* is open to everyone and enables anyone interested in OSH to discuss questions to do with the safety of products and services. OSH experts can draw upon the experiences and suggestions of real-life users described here and use them as input for standardization work.

The Public Area currently offers the following discussion fora:

- ATFX
- Testing and certification
- Personal protective equipment
- Safety of machinery
- Noise and vibration

The *Restricted Area* is open to experts from European OSH institutions who work in standardization, testing/certification or associated research. Almost 500 experts from 20 countries and over 90 OSH institutions are already registered. The experts can currently discuss topics in the following fora:

- ATEX
- Chemical risks
- Electrical safety
- Emissions
- Ergonomics
- EUROSHNET Cracow Memorandum
- General issues
- Machinery
- Personal protective equipment
- Testing, certification, conformity assessment

In addition, there is a database of registered experts, with information on their specialist fields and the standards committees of which they are members. A user-friendly combination of a search and an e-mail function, the database offers a simple means of establishing contact with experts on a variety of topics throughout Europe.

Ergonomics lecture modules

www.ergonomielernen.de

Design courses often neglect the field of ergonomics in their training despite the importance of having machinery and work equipment that make healthfriendly work possible.

With this in mind, KAN commissioned a project to develop materials for ergonomics lectures.



Five lecture modules were produced (in German), which can also be used by lecturers from fields unrelated to ergonomics. The majority of the input was drawn from standards. The materials focus on mechanical and plant engineering but much of the content can be applied to other areas too. Module 1 provides an introduction and a case example describing fundamental problems associated with the ergonomic design of work equipment, together with their ramifications for the work process. The case example is taken up by all the modules. Modules 2 to 4 deliver specialist knowledge on the subjects of anthropometry and biomechanics, workplace environment factors (noise, mechanical vibration, lighting/colour, ambient climate) and the human-machine interface (controls and displays). Module 5 contains application examples for the design of products and workplaces with particular consideration for the target group.

In addition to the theoretical content, the modules contain video sequences to help students visualise situations, cost/benefit analyses and case studies. Additional materials include descriptions of the modules, PowerPoint slides with lecturer's notes, reading lists and exercises and examination questions with an answer key.

Benefits

- Time-saving since the lecture materials are already completely prepared
- Free use of lecturing documents based on sound expertise and the current standards and scientific findings
- Up-to-date thanks to regular revision
- Illustrate real life with video sequences, case studies and exercises
- Ideal way to supplement own documents thanks to modular structure

Seminars

Information and continuing training on standardization issues for OSH experts is an important part of KAN's work. The BGAG Institute Work and Health and KAN hold an annual joint seminar, entitled "Basics of standardization work in OSH", which examines the problems and issues involved in OSH-related standardization from the European perspective.

KAN also runs part of a course for technical inspectors seeking to become senior inspectors, which is managed by the BGN institution for statutory accident insurance and prevention in the foodstuffs industry and the catering trade. This continuing training programme gives an in-depth look at the implementation of European OSH legislation and thus the role of standardization in connection with OSH.

KAN publications 2004-2009

	KAN Reports				
44	Anthropometric data in standards				
43	Safety of construction products and their use				
42	Ergonomics teaching modules for designer training				
41	Safety of agricultural machinery				
40	The new Machinery Directive				
39	Consideration of time-related performance characteristics of PPE in standards				
38	The relevance of generic standards: the example of machine safety				
37	Report on KAN Activities: 1 January 2004 - 31 December 2005				
36	Occupational health and safety aspects in standards governing construction products and their uses				
35	Possible influence of the OHS sector on CEN standardization				
34	Possible influence of the OHS sector on ISO standardization				
33	Standardization pursuant to Directive 94/9/EC (ATEX)				
32	KAN 10 years on				
31	Ergonomics guidelines for the design of medical devices				







	KANBrief
3/09	Personal protective equipment
2/09	Ergonomics, GDS, construction: current topics at KAN
1/09	New tasks await KAN
4/08	European dialogue between OSH experts
3/08	Conference on the new Machinery Directive
2/08	Safety of agricultural machinery
1/08	Practical assistance in OSH and standardization
4/07	Under discussion: CE marking and the GS mark
3/07	Research and innovation
2/07	Standards and the Single Market
1/07	Small and medium-sized enterprises
4/06	New KAN studies
3/06	The New Approach
2/06	New Machinery Directive
1/06	International standardization
4/05	2nd European Conference on standardization, testing and certification in the field of occupational safety and health
3/05	Machinery
2/05	Occupational health and safety's scope of influence
1/05	Keynote: standards
4/04	Personal protective equipment
3/04	Annex ZA
2/04	KAN Colloquium "European Single Market"
1/04	KAN 10 years on

KAN events				
22-23/06/2009	Berlin	ADCO workshop, "Standardization for safe products"		
03/03/2009	Berlin	OSH and standardization conference on "Safety of technical work equipment"		
08-10/10/2008	Hamburg	KAN stand at the "Arbeitsschutz aktuell 2008" fair		
11-12/09/2008	Cracow	Safer products for competitive workplaces – 3rd European conference on standardization, testing and certification		
27-28/05/2008	Munich	European Conference on "The new Machin- ery Directive – The expectations of prevention experts regarding standardization"		
29-30/04/2008	Hanover	Conference on "Safety of technical work equipment"		
07-08/04/2008	Berlin	KAN stand at the "SME conference" organ- ized by the Federal Ministry of Economics and Technology		
18-21/09/2007	Düssel- dorf	KAN stand on the "BG boulevard" at the A+A 2007 fair		
27/03/2007	Berlin	Stand at the European Conference on "Innovation and market access through standards"		
03/11/2006	Sankt Augustin	KAN/BDA workshop, "The significance of standards for OSH in companies"		
27-29/09/2006	Karlsruhe	KAN stand at the "Arbeitsschutz aktuell 2006" fair		
07/03/2006	Sankt Augustin	Workshop, "How OSH stakeholders can influence ISO standardization"		
01/12/2005	Sankt Augustin	Workshop, "How OSH stakeholders can influence ISO standardization"		
24-27/10/2005	Düssel- dorf	KAN stand on the "BG boulevard" at the A+A 2005 fair		
20-21/10/2005	Paris	An enlarged Europe in a globalized world – 2nd European Conference on Standardization, Testing and Certification in the Field of Occupa- tional Safety and Health		
13-15/10/2004	Wies- baden	KAN stand on the "BG boulevard" at the "Arbeitsschutz aktuell 2004" fair		
16/03/2004	Berlin	Colloquium on the occasion of KAN's 10th anniversary, "European Single Market – Involvement of OSH parties in standardization"		

KAN members

As at: September 2009

STATE INSTITUTIONS			
Full members	Substitutes		
Michael Koll Alternating Chair of KAN Federal Ministry of Labour and Social Affairs (BMAS)	Maria Vleurinck Federal Ministry of Labour and Social Affairs (BMAS)		
Norbert Barz Federal Ministry of Economics and Technology (BMWi)	Joachim Geiß Federal Ministry of Economics and Technology (BMWi)		
Isabel Rothe President of the Federal Institute for Occupational Safety and Health (BAuA)	Dr Karl-Ernst Poppendick Federal Institute for Occupational Safety and Health (BAuA)		
Hartmut Karsten Ministry of Health and Social Affairs of the German state of Saxony-Anhalt	Helmut Heming Ministry of Social Affairs, Women, Family and Health of the German state of Lower Saxony		
André Conrad Senate administration for Health, Environment and Consumer Protection, Berlin	Andreas Voigt Senate administration for Health, Environment and Consumer Protection, Berlin		
Thomas Just Ministry of Labour, Family and Health of the German state of Hesse	N.N.		

EMPLOYERS			
Full members	Substitutes		
Norbert Breutmann Chairman of KAN Confederation of German Employers' Associations (BDA)	Ursula Spellenberg Daimler AG		
Dr Jochen Rudolph Degussa AG	Jan Dannenbring German Confederation of Skilled Crafts (ZDH)		
Karl Josef Keller Employers' Association of the Metal and Electrical Industries of North Rhine-Westphalia (METALL NRW)	Rudolf Domscheid Central Federation of the German Building Trade (ZDB)		
Bernd Kähler Robert Bosch GmbH	Dr Christian Gravert Deutsche Bahn AG		
Anne Augustin German Federation of Chemical Employers' Associations (BAVC)	Prof Dr Sascha Stowasser Institute of Applied Ergonomics (IfaA)		

EMPLOYEES			
Full members	Substitutes		
Marina Schröder Alternating Chair of KAN German Trade Union Federation (DGB)	Thomas Veit German Metalworkers' Trade Union (IG Metall)		
Heinz Fritsche German Metalworkers' Trade Union (IG Metall)	Rolf Gehring European Federation of Building and Woodworkers (EFBWW)		
Hans Werner Seidemann Building, Agricultural and Environ- mental Workers' Union (IG BAU) Health and Safety Office, Wiesbaden	Brigitte Warmbier Food and Restaurant Workers' Union (NGG) Wilhelm Brandenburg GmbH		
Matthias Kuhn Mining, Chemical and Energy Industrial Union (IG BCE) Higher mining authority for Saarland	Norbert Weber Transnet Trade Union		
Dr Horst Riesenberg-Mordeja German Unified Service Sector Union (ver.di)	Uve Wittfoth German Unified Service Sector Union (ver.di) Health and safety office of the Free Hanseatic City of Bremen		

GERMAN SOCIAL ACCIDENT INSURANCE (DGUV)			
Full members	Substitutes		
Dr Walter Eichendorf Deputy Director General of the DGUV	Michael Jansen DGUV, Central Prevention Division		

DIN GERMAN INSTITUTE FOR STANDARDIZATION			
Full members	Substitutes		
Dr Albert Hövel DIN	Thomas von Hoegen DIN		

PERMANENT OBSERVERS			
Martin Hartenbach Central Agricultural Social Insurance Fund (LSV-SpV)	Dr Gerhard Imgrund German Commission for Electrical, Electronic & Information Technologies of DIN and VDE (DKE)		

KAN Secretariat staff

As at: December 2009

Name	Duties Tel. +4	9 2241 231			
Management					
Werner Sterk	Head of the Secretariat	-3460			
Angela Janowitz	Deputy Head of the Secretariat Methods with which the OSH sphere can influence standardization; standardization and safety and health of workers at work; EUROSHNET	-3453			
Gabriele Strupkus	Secretary	-3461			
	Social Partners Liaison Office, Employers				
Eckhard Metze	Advisory services for associations, enterprises and the political sphere, national and international standardization policy; OSH organization/OSH management systems; ergonomics/mental stress; corporate social responsibility	-3452			
Gabriele Strupkus	Secretary	-3461			
	Social Partners Liaison Office, Employees				
Ulrich Bamberg	Advisory services for trade unions on standardization issues; standardization policy; OSH organization/OSH management systems; ergonomics/mental stress; machinery safety; personal protective equipment; transport and traffic	-3451			
Gisela Piel	Secretary	-3456			
Staff					
Ute Assenmacher	KAN website; EUROSHNET	-3465			
Silke Born	Finance clerk	-3458			
Gudrun Flesch	Finance clerk	-3458			

Corado Mattiuzzo	Machinery; personal protective equipment; gas appliances; general product safety; pressure equipment; uncertainty of measurement; standardization policy	-3466
Sonja Miesner	Translations; editing of KANBrief; EUROSHNET	-3455
Bettina Palka	Noise and vibrations; services; education; visual display terminals; fire services	-3462
Helga Quade	Event organization	-3449
Michael Robert	Construction products; editing of KANBrief; EUROSHNET	-3463
Katharina von Rymon Lipinski	Agricultural machinery; lighting; indoor climate; safety signs	-3467
Rita Schlüter	Agricultural machinery; machinery safety	-3475
Dr Michael Thierbach	Electrical equipment; non-ionizing radiation; fire and explosion protection; industrial trucks; electrical engineering standards in the area of health and safety of workers at the workplace; nanotechnology	-3474
Dr Anja Vomberg	Chemical and biological hazards; ergonomics; NoRA; KAN website; expert database	-3454
Birgit Winkler	Finance clerk; secretary	-3459





Verein zur

Förderung

der Arbeitssicherheit

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