

5.4 The Committee agrees that banks should be required to immediately inform the court, by electronic or other means of communication, of how they have complied with the order.

5.5 Community law should not lay down rules for ranking creditors competing over the same bank account. The Committee favours the application of national legislation.

5.6 The Committee considers that the practical enforcement of the order should be governed by the law of the country that

has jurisdiction over this, in accordance with the applicable general rules on dispute settlement.

5.7 Lastly, the Committee would particularly draw the Commission's attention to the need to make provision for a mechanism for the translation of documents relating to the operation of the proposed system, along the lines of the mechanism established under Article 21(2)(b) of Regulation (EC) No 1896/2006 of 12 December 2006.

Brussels, 26 September 2007.

The President
of the European Economic and Social Committee
Dimitris DIMITRIADIS

Opinion of the European Economic and Social Committee on the 'Simplification of the regulatory environment for the machinery sector'

(2008/C 10/03)

On 8 January 2007, European Commission vice-presidents Margot Wallström and Günter Verheugen requested the European Economic and Social Committee to draw up an exploratory opinion on the *Simplification of the regulatory environment for the machinery sector*.

The Section for the Single Market, Production and Consumption, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 18 July 2007. The rapporteur was **Mr Iozia**.

At its 438th plenary session, held on 26 and 27 September 2007 (meeting of 26 September), the European Economic and Social Committee adopted the following opinion by 138 votes to 2, with 3 abstentions.

1. Conclusions and recommendations

1.1 The European machinery industry is a key, cutting-edge industry for the European economy. In 2006, several hundred billion euro of turnover were generated by over 130 000 companies which export a third of their production. The machinery and electromechanical industry employs over four million workers within the EU, with high added value and levels of knowledge.

1.2 The machinery and electromechanical industry can contribute more than other industries to the achievement of the Lisbon goals by developing lifelong training, exchanging expertise and best practices and maintaining its ability to be competitive and penetrate world markets at the highest possible level.

1.3 The EESC supports the Commission's initiatives to strengthen the competitiveness of the sector and improve the reference legal framework with better and more effective regulation, taking into account the nature of the sector, which includes tens of thousands of small and medium-sized busi-

nesses. Better legislation, at least where this sector is concerned, does not mean no legislation, but providing a clear, stable framework whose rules are easy to implement and where administrative costs are kept to a minimum.

1.4 The EESC welcomes the Commission's decision to entrust to it this sensitive task of identifying, with the greatest possible consensus, areas of existing Community legislation which require simplification, in the wake of the activities which have stimulated legislative bodies to develop better, simpler legislation.

1.5 The EESC notes that various legislative initiatives are under way concerning the sector: the different interests involved — economic, social, environmental — need to be reconciled. The creation of the internal market must not jeopardise other, very important considerations such as health and safety in the workplace and consumer and environmental protection, in the context of the Lisbon goals. The EESC believes that a strategy integrating and coordinating the different initiatives is needed.

1.6 The EESC welcomes the Commission's proposals in the Communication of 17 February 2007 modifying the new approach and strengthening the role of Member States' market surveillance activities, which they sometimes under-resource. The EESC calls for more Commission staff to be assigned to coordination, monitoring and, in some cases, even checks on management of accreditation procedures, notification bodies' activities and the quality of their certification. It supports the creation of a 'platform for communication' between operators and Member States, which must act commensurately and consistently with the goals of the directives and Community policy, bringing about gradual convergence of market surveillance systems and models.

1.7 As regards standardisation activities, the EESC calls for all stakeholders to be enabled to participate from the outset in drawing up standards, strengthening the role both of technical committees, particularly at local level, and impact assessments, without excessive use of telematic consultation, which although a useful tool must not be the only means of consulting stakeholders, particularly in this case.

1.8 As regards 'harmonised' standardisation, the EESC feels that this should be made available free of charge or for a token amount, particularly to small and medium-sized enterprises, and points out the disparity between the treatment of firms which do not belong to the countries in whose languages the rules are published (English, French and sometimes German) and that of the others, which do not have to bear what can be huge translation costs.

1.9 The EESC stresses that all unnecessary administrative costs should be removed, substantially reducing the burden on the production system.

1.10 The EESC calls on the Commission to take into due consideration the need to encourage stable standardisation, incorporating suggestions from operators and key stakeholders. As regards the legal framework and the reference legal basis, the EESC recommends that, before issuing legislation, the Commission assess whether the same objectives could not be achieved by other means such as self-regulation or coregulation, as long as maximum transparency and fully-inclusive stakeholder participation can be ensured, and consistently consider the main aim of the standard and its content when determining the relevant Treaty articles to use as a legal basis.

1.11 The EESC calls for technical barriers to the completion of the internal market to be removed. Unnecessary national and local regulations are a genuine, insurmountable barrier to the free movement of goods.

1.12 The EESC recommends that future legislation always be preceded by a proper, careful, ex ante impact assessment, taking account of the degree of proportionality, and also be followed by very stringent, ex post monitoring to repair damage which would otherwise be irreparable for the future of the sector's companies.

1.13 European sectoral social dialogue will also have a key role to play in identifying all the common initiatives supporting job creation and development of competitiveness in the sector, with due regard for workers', public and environmental safety, which are sacrosanct principles. Corporate social responsibility practices will facilitate this ongoing dialogue between companies and stakeholders, to prevent improper use, increase knowledge and lifelong training and build a good relationship with the region in question and end consumers.

2. Gist of the Commission referral

2.1 The European Commission, on the initiative of vice-presidents Wallström and Verheugen, has asked the EESC to draw up an exploratory opinion aimed at analysing the general coherence of the regulatory framework for the machinery sector, in order to determine the scope for simplification. In addition to the relevant sectoral legislation, the analysis must take in the whole regulatory environment applying to the machinery sector.

2.2 With a view to involving the interested parties in the simplification process, specifically in identifying rules that might prove particularly problematic, the Commission has turned to the EESC, recognising that given its considerable wealth of experience and truly pluralist membership, it is the ideal body to reflect and condense the views of Europe's economic operators, workers and civil society.

2.3 Given its experience gained through numerous opinions on better regulation and simplification⁽¹⁾ and in view of Article 8 of the *Cooperation protocol between the European Commission and the EESC*, the Commission is entrusting this important task to the EESC. Should the EESC's work prove productive and beneficial, the Commission has suggested that it may repeat the request for many other areas of importance to its — and the EESC's — *Better Regulation* agenda.

2.4 The Commission has subsequently clarified its viewpoint, stating that better regulation does not necessarily mean less regulation, and that in fact we must safeguard at least current levels of protection for workers, consumers and the environment, with a view to ensuring a regulatory framework that allows for increased competitiveness.

⁽¹⁾ OJ C 24 of 31.1.2006, rapporteur: Mr Retureau; and OJ C 309 of 16.12.2006, rapporteur: Mr Cassidy.

3. General comments

3.1 The EESC would start by saying that it is extremely keen to undertake the task of reconciling the various interests involved, with a view to presenting a proposal on improving and simplifying the current regulatory and legislative environment. The best feature of the EESC is its ability to influence the decision-making process by hammering out the widest possible consensus among civil society representatives holding different viewpoints. By faithfully upholding the EU's principles and values, and by producing balanced, high-quality and innovative opinions, the EESC is an important and effective partner for the EU institutions. The Commission's request presents all members of the EESC with the stimulating challenge of making full use of this opportunity to further enhance the role of organised civil society, as recognised in the Treaties, to provide a forum for meeting and discussion.

3.2 The opportunity for the EESC to have an early input into identifying the specific areas in which the regulatory environment can be improved, breaks new ground in the cooperation between the EU institutions. All interested parties have, of course, already notified the Commission individually of their own requirements and preferences. Manufacturers, users, workers, consumers, standardisation bodies and public authorities have all indicated how they would like to see the existing rules *improved*. The consultation methods employed to date have not, however, produced an accurate picture reflecting the various interests, leaving all parties feeling at some stage that their views have not been taken on board.

3.3 The EESC can, however, present an accurate reflection of these interests, given both its diverse in-house expertise, and the networks of important contacts that its members can draw on to gain important insights. The EESC expressed some of its views on this subject in its Own-initiative opinion on Industrial Change in the Mechanical Engineering Sector ^(?).

3.4 The EESC notes that various initiatives have been launched or announced with regard to EU rules on industrial production and, specifically, the machinery sector. These initiatives give rise to a variety of complex problems. It would be useful to examine these problems taking account of the range of interests that EU legislation protects: the free movement of goods, workers' health and safety, consumer protection, environmental protection and the economic and social objectives of the Lisbon Strategy. These EU laws derive from different legislative instruments and a study of this kind has never been carried out. The EESC believes that the time really has come to address the whole issue comprehensively and systematically.

3.5 EU laws on the production and marketing of industrial materials have been drafted incrementally. This has generally ensured legislative harmonisation, which has greatly simplified the regulatory environment in which companies operate, although it must be stressed that this process has not yet been completed.

3.6 EU laws adopted since the late 1980s derive from two major bodies of rules: one on the market and the other on the workplace. The effective implementation of these rules requires the involvement of a wide range of parties: standardisation and notification bodies, designers and manufacturers, importers and distributors, assemblers and fitters, public inspection and disciplinary bodies (including customs and the judiciary), entrepreneurs, workers and workers' representatives, etc. Consumer organisations are very keen to be given a practical and effective role, their involvement to date being deemed insufficient. Cooperation between all of these parties is crucial, as is cooperation between public authorities at national and EU levels.

3.7 Applying these rules does not seem to create any major difficulties. However, despite this generally favourable assessment there are a certain number of practical problems that must not be overlooked.

4. Improved safety levels, but still some way to go

4.1 Every year across the EU there are between 6 000 and 8 000 fatal accidents at work (40 % of which involving workers under 35) and hundreds of thousands causing injuries. Some of these accidents are caused by work tools. In certain cases, inadequate personal safety equipment or training is also to blame. Approximately one quarter of EU workers claim to be required to use personal safety equipment for health and safety reasons. The main physical agents representing risk factors in the workplace are generally linked to work tools: noise, vibrations, ionising and non-ionising rays. Ergonomic factors have a crucial bearing on health and safety at work. In some cases, work tools may cause significant exposure to chemicals: the effectiveness of personal safety equipment may sometimes be crucial.

4.2 Particular consideration must be given to consumer products, the public being largely indifferent and undoubtedly unalerted to the inherent potential risks of the machinery they buy or hire. Sadly, too many accidents are occurring through improper use by consumers, and these are not included in the statistics.

^(?) OJ C 267 of 27.10.2005 (rapporteur: Mr Van Iersel).

5. Cooperation between the various parties is sometimes difficult

5.1 It should be noted that cooperation between the parties operating on the single market is faced with real difficulties including a deep-rooted reluctance to act with full transparency. This reluctance, on the part of the private sector, stems from a desire to protect against competition or possible sanctions, and on the part of the public sector results from bureaucratic inertia, sometimes quite entrenched. For example, there is a clear need to step up cooperation between manufacturers and users and to increase transparency in the way in which the key requirements of the *New Approach* directives are interpreted by the standardisation, supervisory and notification bodies and by consultants providing technical support to entrepreneurs.

5.2 This problem was a key concern for the Commission when launching its recent initiative on 14 February 2007, under the review of the *new approach*, entitled *New Internal Market package for goods*. This consists of a draft regulation *Setting out the requirements for accreditation and market surveillance relating to the marketing of products* (COM(2007) 37 final) ⁽³⁾ and a draft decision on a *Common framework for the marketing of products* (COM(2007) final) ⁽⁴⁾. One of its proposals is that *'market surveillance structures will be reinforced to catch unsafe products, remove them from the whole Community market and take action against fraudulent companies. The testing, certification and inspection bodies who are involved in product checking will be subject to more stringent controls in the form of accreditation, to ensure that there is a level playing field both for manufacturers and for the bodies themselves'*. (There are currently about 1 800 notification bodies in the EU, specifically laboratories, inspection and certification bodies. These are private entities accredited by public authorities.) It should be noted that these 'independent' bodies include some which have been directly set up by manufacturing firms' associations, and the conflict of interests here could become a real problem. In one Member State, for example, in the lifts sector alone over 80 notification bodies have been accredited.

5.2.1 Twenty-two years on from the issue of the Council resolution of 7 May 1985 incorporating the new approach principles, the Commission is proposing to modernise and strengthen market surveillance, making the CE marking increasingly trustworthy. The EESC feels that the new approach method, which was addressed by 25 directives (21 of which included specifications for granting the marking while four did not), has yielded good results and encouraged development of the internal market, although at the same time it considers that the proposed review is appropriate. Member States' powers and responsibilities must be increased, as must those of the

Commission, which will have to appoint more staff if it is to continuously monitor market surveillance, accreditation procedures for notification bodies and, in some cases, the activities of these bodies as well. In the Commission's survey, the vast majority of sectoral organisations were in favour of strengthening national and, accordingly, European authorities in this way.

5.3 The EESC welcomes this initiative, which limits the scope for discretion and inconsistent assessment that hinders the development of the internal market and leads to a competitive disadvantage for compliant operators. The distortion of competition caused by lapses in surveillance is a huge problem which serves to highlight one of the constraints on implementation of the new approach. It is also crucial to ensure the simplicity and clarity of the regulatory framework, particularly for small and medium-sized enterprises, as well as to step up cooperation between market supervisory authorities, both in the EU/EEA area and internationally. The EESC supports the creation of a 'platform for communication' between operators and Member States, which must act commensurately and consistently with the goals of the directives and Community policy, bringing about gradual convergence of market surveillance systems and models. It is crucial that customs authorities are involved in this.

5.4 At European level, greater cooperation is needed between all DGs concerned (e.g. ENTR, ENV, EMPL and SANCO), which could work together to produce 'guides' on the application of existing directives. These would not replace the standards, of course, but they could be useful and save a lot of money being spent on unnecessary consultancy fees.

5.5 As regards seasonal products such as garden machinery, accelerated procedures need to be laid down to prevent market opportunities being missed. Notwithstanding the need for rigorous implementation of all the legislation, especially safety rules, the EESC proposes that a 'mediation institute' be set up to this end which could be called on to ensure that specific, valid needs are met.

6. Administrative burdens — not always necessary

6.1 Another Commission priority is to reduce unnecessary red tape, which impacts considerably on competition. The EESC is following with interest the Commission's work in this area, which has taken the form of an action programme, presented on 24 January 2007, aimed at cutting administrative burdens on companies by a quarter by 2012.

⁽³⁾ Opinion INT/352, in preparation (rapporteur: Mr Pezzini).

⁽⁴⁾ Opinion INT/353, idem 3.

6.2 The Commission could help provide a practical solution to problems regarding the application of directives by, for example, acting as a central office for all communications that currently have to be sent to the individual Member States, involving great difficulties in ascertaining the correct address. This is the case for Directive 2000/14/EC on noise emissions, under which a declaration of conformity has to be sent to a Member State and to the Commission, and for Directive 97/68/EC on emissions from machinery engines, under which, if using the 'flexibility scheme', companies have to notify the relevant authorities of each Member State of type-approval received, reporting to them every six months.

6.3 Putting into practice the directives on the protection of workers from physical agents presents many difficulties for business. Particularly problematic are the directives on vibrations (2002/44/EC) and on the risk of exposure to non-ionising radiation (2006/25/EC), especially for SMEs. Such problems could arise in the application of the next directive on artificial optical radiation. Guidelines on their practical application are needed, if these directives are to achieve their objectives. Clearly, where it is genuinely impossible to apply them in practice, thought will have to be given, and swift action taken, regarding the amendments needed to enable companies fulfil their legal obligations.

6.4 In the field of industrial production and specifically machinery, it is important to take account of the various requirements involved when dealing with the issue of administrative burdens. Traceability of work carried out by the various parties is fundamental both to the physical safety of users and to the legal certainty of contractual relations established in the market. It is therefore necessary to present balanced solutions which retain the requirement for transparency and traceability, while not adding unnecessary administrative costs.

7. The role of standardisation

7.1 Technical standards play a key role in the functioning of EU rules and flesh out the basic safety requirements laid down in legislation. Compliance with these standards confers a presumption of conformity with the relevant directives. Certification, where necessary, by accredited notification bodies goes hand in hand with the legislative framework of rules.

7.2 Overall, European standardisation bodies have carried out very useful work on the basis of Commission mandates. Drawing up standards should require greater involvement of stakeholders, as this would facilitate subsequent comparison. The fact remains, however, that this is the work of a select few. The majority of user industries do not have the expertise or the resources to regularly monitor this work. There is even less involvement of workers and consumers. This situation makes it difficult to take account of the importance of experience gained. Certain standards do not address the full range of concerns

noted 'on the ground'. The EESC calls for greater stakeholder participation in technical committees, particularly at local level, in this sector in which few people have genuine decision-making power. It notes with concern that the growing cost of standardisation could become a constraint on competition, and even safety, where the risk is taken, for example, of using machinery improperly, for uses which conflict with standards. Some SMEs in Eastern Europe have a tendency to 'wing it' or resort to expedient devices.

7.3 The EESC welcomes the initiatives announced on 15 March 2007 under the *Action plan for European standardisation*, in which all Member States were invited to report on the state of play of the implementation at national level of the measures taken to enhance the participation of stakeholders in European/international standardisation. The Commission, for its part, is to collect the observations made and integrate them into European standardisation. The involvement of SMEs in standardisation is essential, both at EU and national levels; they must make an effective and practical contribution to future standardisation processes.

7.4 In certain cases it can be more difficult for entrepreneurs to comply with all health and safety legislation requirements. Risk assessment, where machinery is used, requires complementarity between the manufacturer and the user company. Problems can arise if standards do not provide for sufficient information to be supplied on any residual risk that the company must take into consideration. If companies are not properly informed of the residual risk attached to a machine that they purchase, they will have difficulty in complying with the risk assessment obligations stipulated in Framework Directive 89/391/EEC and in its 19 daughter directives on the active and passive protection of workers.

7.5 Dissemination of these standards can be problematic for small and medium-sized enterprises given the high cost of acquiring them; while standardisation leads to certification procedures, the administrative costs incurred are generally much higher than those resulting directly from legislation.

7.6 The risk analysis provided by CEN specialists is extremely important for entrepreneurs, who must combine it with a specific analysis of the actual working environment in which the machinery will be used. The cost of these harmonised standards is high, particularly for SMEs. The EESC calls for consideration to be given to the proposal that *harmonised* standards, deriving from the CEN's Commission mandate, be made available for free or for a token fee, to allow them to fulfil their legal obligations. Free dissemination on the Internet, moreover, has already been successfully implemented by the telecommunications sector, where some ETSI (European Telecommunications Standard Institute) standards are placed directly on the Web.

8. Promote regulatory stability

8.1 The EESC points out that it is not always necessary to modify directives that have been and continue to be successful. Undoubtedly, while the work and conclusions leading to the comprehensive overhaul of Directive 98/37/EC — known as the *Machinery Directive* — were particularly complex, an optimum balance was ultimately struck between the various stakeholders. In certain other cases, it would perhaps be better to avoid excessive ‘enhancement’, such as when amending the Low Voltage Directive (73/23/EC) or, as pointed out by the machinery manufacturers’ association in its letter of 5 November 2004, in the case of the inappropriate Commission proposal to merge Directive 87/404/EC and the Pressure Equipment Directive (97/23).

8.2 It has become apparent that the market needs a clear, stable regulatory framework to take the anxiety out of investment planning and enable it to adhere to clear rules which are not changed too often. On the other hand, there is a very real danger that ‘simplification’ could result in greater administrative costs and higher costs for conformity assessment procedures as they become more complex.

8.3 Moreover, as regards the possibility of using Article 95 of the Treaty, while the EESC understands manufacturers’ needs, it stresses that the reference legal framework underlying the adoption of directives must be in line with the fundamental principles of the Treaties, particularly in terms of the legal basis for the different standards. Clearly, focus on the objective and the content of the instrument should be the real reference criteria for implementation of the various standards. The European Court of Justice has also issued a number of judgments in this connection, some recently, excluding in any case the possibility of a mixed legal basis where references are contradictory or so layered as to limit Parliament’s rights. In the case of product design, where another objective is the focus, the desire of businesses to take as a basis Article 95(3) of the Treaty, which, as is well-known, limits Member States’ power and strengthens Community rules, as provided for in Article 137 or Article 175 for example, cannot always be fulfilled⁽⁵⁾. Businesses point to the added costs (which are borne by the end user) that making the necessary modifications to machinery design and production entails, in response to requests from individual Member States. Complementary legislative models should be devised which do not overlap but limit to the minimum Member States’ ability to adopt separate, different measures, which must be in line with the principles of common sense and proportionality.

8.4 The recent REACH directive is a milestone in consumer and worker protection. The EESC has endorsed the technical solutions adopted and the prospect of flexibility associated with simplification; however, it points out with some concern that small and medium-sized businesses could find themselves in

some difficulties, especially if import checks are not as rigorous as this fundamental directive requires. The EESC urges the Commission to monitor carefully Member States’ market surveillance procedures, as in this particular sector they have not always managed to perform their role effectively in the past, partly because the designated surveillance bodies have been seriously under-resourced. In this connection, depending on the degree of dominance of certain areas of production within the Member States, tasks could be divided between surveillance authorities, by product area for instance (valves and fittings, lifting and handling equipment, pumps and compressors, machinery for the manufacturing industries, etc.).

8.5 Despite the key contribution made by the mechanical engineering industry to the European economy as a whole, Member States seem to invest very little in the institutional activities for which they are responsible. The Commission could request information on this and compare it with the practical results obtained. Often, it is left to individual ability/commitment to determine the quality and number of checks, but much depends on the available resources.

9. Remove technical barriers to full development of the single market

9.1 Within national legislation, a range of technical barriers remain, creating significant problems for companies. One sector affected, for example, is non-road mobile machinery needing to be transported on public roads. As different rules, with varying levels of stringency, apply across the Member States, firms need to be equipped with several different types. There is some confusion as regards terminology as well, for example in the use of the terms ‘undertakings’ and ‘firms’. The inspection requirements in some Member States entail additional costs, which are often duplicated for each country that provides for inspection by a specific body in the development, testing, or transport phases. In particular where safety measures are concerned, the EESC calls for harmonisation of legislation to be carried out quickly. As regards tractors, for example, over and above existing provisions on rear-view mirrors and speed limits, technical specifications must be laid down for front and rear lights and, most importantly, braking distance. There are currently tractors on European roads which were made as long as forty years ago. Gradual replacement of the fleet would ensure much more effective active and passive safety levels.

9.2 To regulate the use of machinery on public roads, the EESC recommends the following:

- adopting a proposal to harmonise existing national legislation on the use of machinery on public roads;

⁽⁵⁾ Judgement of the Court in Case C-94/03: Commission of the European Communities v Council of the European Union — Choice of legal basis.

- using the *New Approach* methodology;
- providing for benchmark standards that confer a presumption of conformity with requirements;
- including appropriate provisions for conformity assessment, bringing in a more rigorous conformity assessment for certain systems (steering, brakes, etc.).

10. Future legislation: involvement and impact assessment

10.1 The EESC calls for closer cooperation in future between regulators and stakeholders on future regulation policies, by means of effective dialogue, and without overly relying on consultation, given the need for interaction between the parties. In the EESC's view, in some specific areas, frequent, ongoing consultation would prevent problems, thus ensuring better quality legislation and more effective standards.

10.2 The EESC believes it is crucial to develop, for the various options, an impact assessment methodology common to all EU institutions — Parliament, Council and Commission — as well as a suitable quality control system.

10.3 The Commission should always consider whether its intended objectives actually necessitate a regulatory framework or whether, in fact, self-regulation or co-regulation would be sufficient. The EESC believes that among the various options, the aim must be to choose the one which can meet the same objectives at a lower cost and with a lower administrative burden, and which can ensure maximum transparency and stakeholder participation.

10.4 Sectoral social dialogue has a key role to play. The common interest could be served in practice by specific initiatives to develop training, particularly in the area of safety in the workplace, including lifelong training, which builds not only skills but also awareness of the various managerial and organisational issues related to better and safer use of machinery. Corporate social responsibility, implemented through an extended dialogue which includes civil society and local authority representatives, could help to develop a safe, productive corporate culture, especially in small and medium-sized businesses, where risk management is clearly more difficult.

10.5 The EESC believes that it would be useful to carry out a review allowing all interested parties to assess the merits and limitations of the regulatory framework. Such an assessment would allow us to proceed in a unified manner and ensure that the various initiatives under way do not produce incomplete solutions or conflicting results. The Commission's decision to discuss the new Machinery Directive with stakeholders is a step in the right direction. More initiatives of this kind are needed. In particular, the EESC highlights the links between the various initiatives, such as those under the action programme on reducing unnecessary red tape and the *New Approach* (on 14 February 2007, the Commission adopted its proposals for a Council and European Parliament regulation and decision on a review framework for the *New Approach*, on the basis of a public consultation on the future of the internal market). The EESC is convinced that a joined-up approach to these initiatives and proper coordination thereof are likely to tangibly improve the current body of legislation and its uniform application across the 27 Member States.

Brussels, 26 September 2007.

The President
of the European Economic and Social Committee
Dimitris DIMITRIADIS
