

Results of the EU Survey on Conformity Assessment

I. Introduction: context and rationale

Mutual Recognition Agreements on conformity assessment (MRAs) are instruments that facilitate market access by reducing costs and time associated with mandatory product certification and testing as they provide for the mutual recognition between trading partners of mandatory test results and certificates for certain manufactured products. This makes trade quicker, easier and cheaper, while maintaining a high level of safety. The EU has MRAs with Australia, Canada, Israel, Japan, New Zealand, Switzerland, and the USA.

In the period from 10 March until 24 April 2022, the European Commission, DG TRADE, conducted a pan-EU survey on MRAs and conformity assessment. The survey was available online and it was anonymous although interested respondents could leave their contact details.

The survey was targeted at EU companies manufacturing or selling industrial products. Its aim was to increase awareness among EU industry of the opportunities provided by MRAs and to identify specific challenges faced by EU industry in respect of conformity assessment in markets outside the EU. The results of the survey are valuable inputs for an assessment of the potential for updating or expanding the EU's existing MRAs, including for the work related to avoiding new and unnecessary technical barriers to trade in the context of the EU-US Trade and Technology Council, Working Group 10 on Global Trade Challenges.

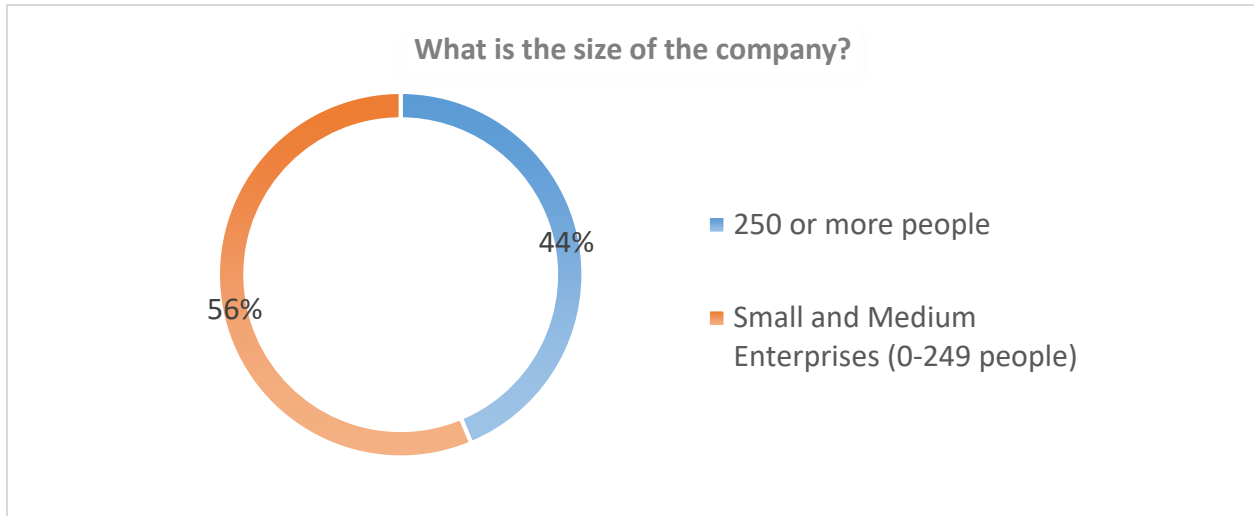
II. Participation rate and respondents' profile

During the period the survey was available online, there were in total 217 responses received. Of these 217 responses, 10 responses did not refer to industrial manufactured products but instead to food, feed or wine, and therefore were not considered further in the analysis. Furthermore, four responses could be identified as industry associations and one of them indicated that the problem is the export control regulation and therefore this response was not considered further in the analysis. Accordingly, **206 responses were analysed**: 203 from individual exporting companies and three from industry associations.

When filling in the questionnaire it was possible for respondents to leave a question without reply. The amount of "No reply" responses accounts on average for about 8%, depending on the question. The "No reply" ratio is not specifically mentioned in the below analysis.

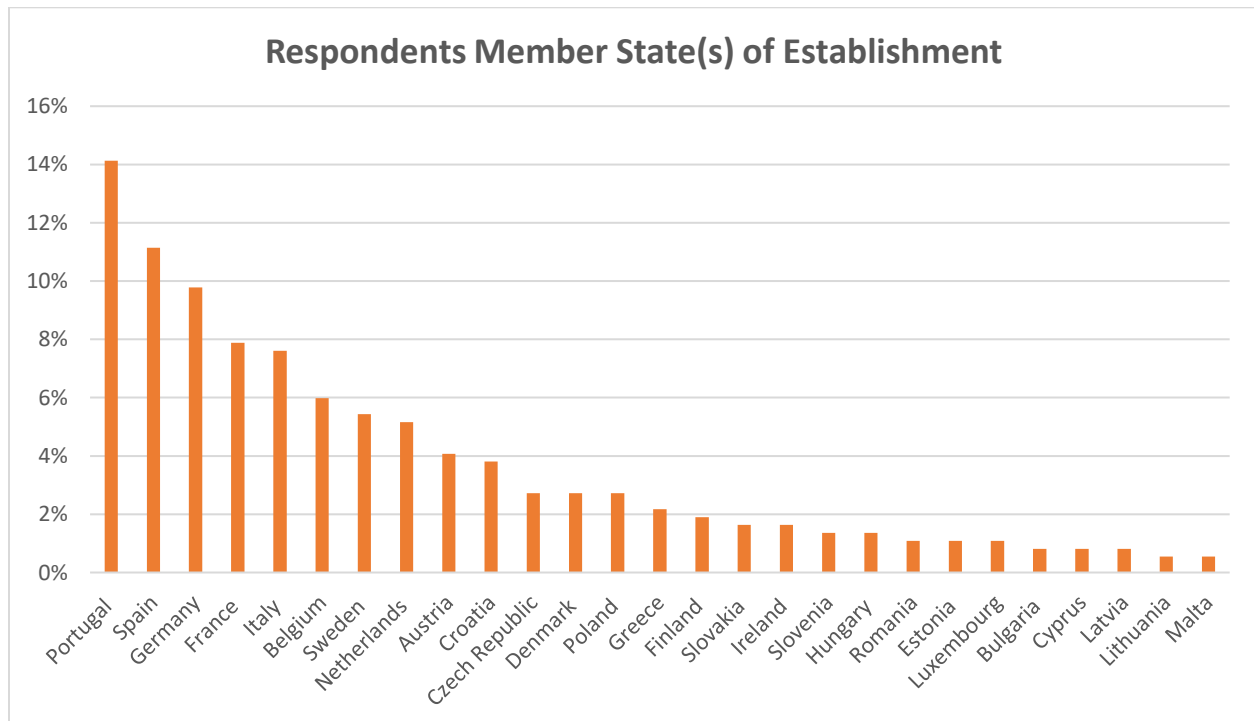
The majority of the survey participants (116) are small and medium sized companies (having 0-249 employees) representing 56% of the respondents, while 44% of respondents (90) are companies that have 250 or more employees.

Figure 1. Company size



With regard to the Member State in which the company is established, 3% answered that they are established in all Member States. The largest number of respondents are established in Portugal (14%), followed by (11%), Germany (10%), then France and Italy with 8% each. The survey received responses from all EU Member States.

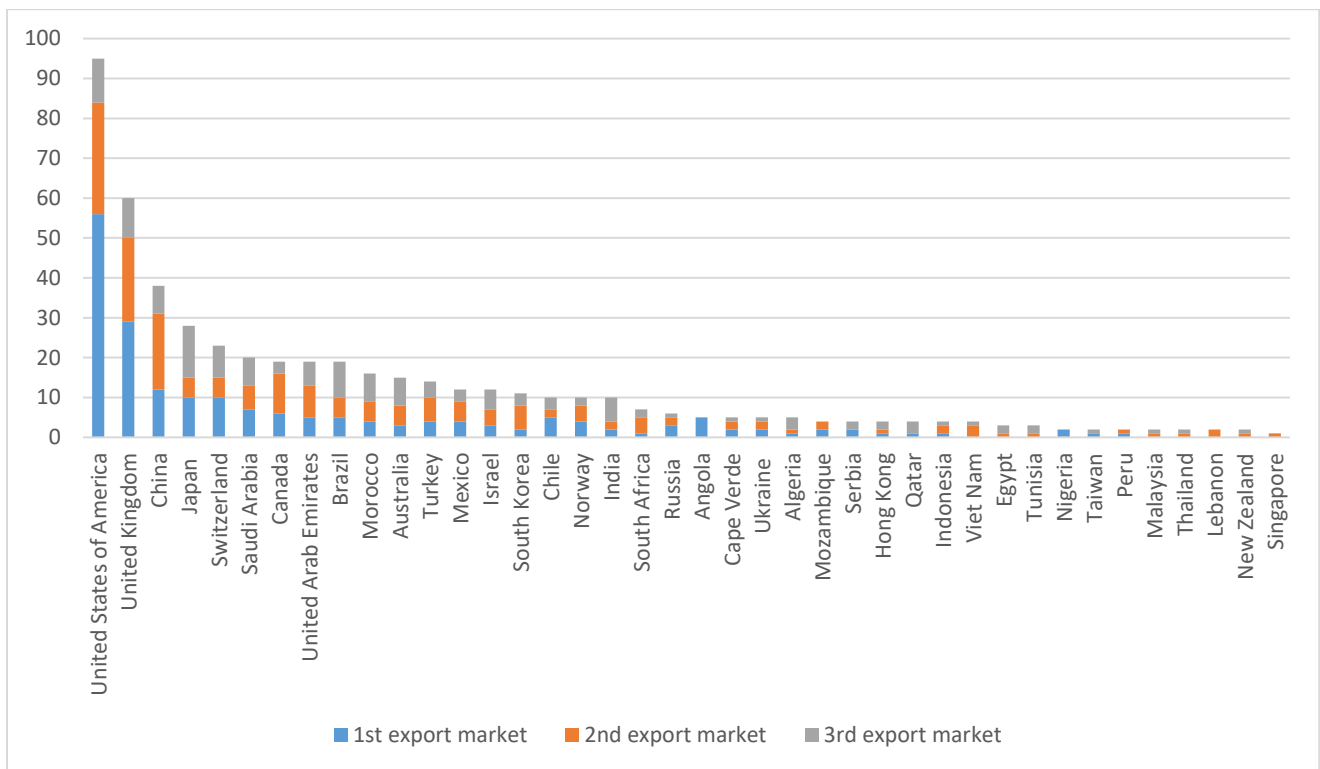
Figure 2. Survey responses, by Member States



III. Main results

One important question asked referred to the top markets for the respondents, in connection to the MRA-related topics in the survey. The United States, the United Kingdom and China are the top three export markets of the survey participants, followed by Japan and Switzerland (see Figure 3. below).

Figure 3. Top exporting destinations for survey respondents



A second key question was aimed at identifying the main sectors of interest from a conformity assessment viewpoint. With regard to product groups exported, the survey listed a number of products for which an MRA is in place, but also some products and sectors for which an MRA would in principle be a suitable tool to address barriers in conformity assessment and testing. The survey participants could also indicate any other product group(s) that they are exporting. Finally, it is important to note that respondents could indicate more than one product category that they export.

As it can be seen in Figure 4., the most prominent product groups exported are construction products, electrical and electronic equipment, medical devices and machinery. Other product groups that were identified by the respondents are cosmetics, personal care products and chemicals (see Figure 5. below).

Figure 4. Exported product groups

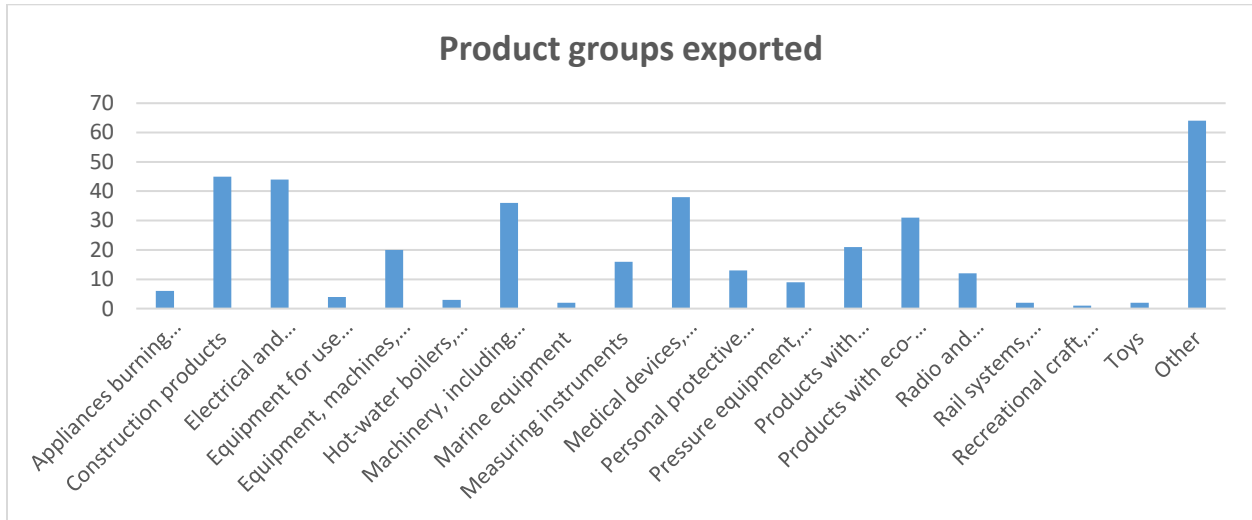


Figure 5. Other exported product groups



As can be seen in Figure 6., out of the total respondents that export at least one product category covered by at least one of the EU MRAs, 34% indicated that they use the MRA(s), 45% indicated that they do not use the MRAs, while 16% were not able to determine whether they use the MRAs or not.

Figure 6. Use of Mutual Recognition Agreements on Conformity Assessment

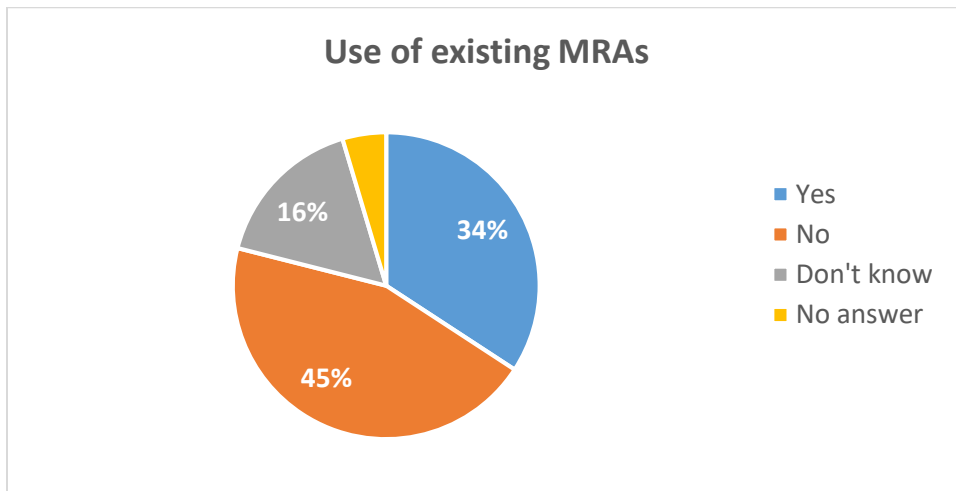
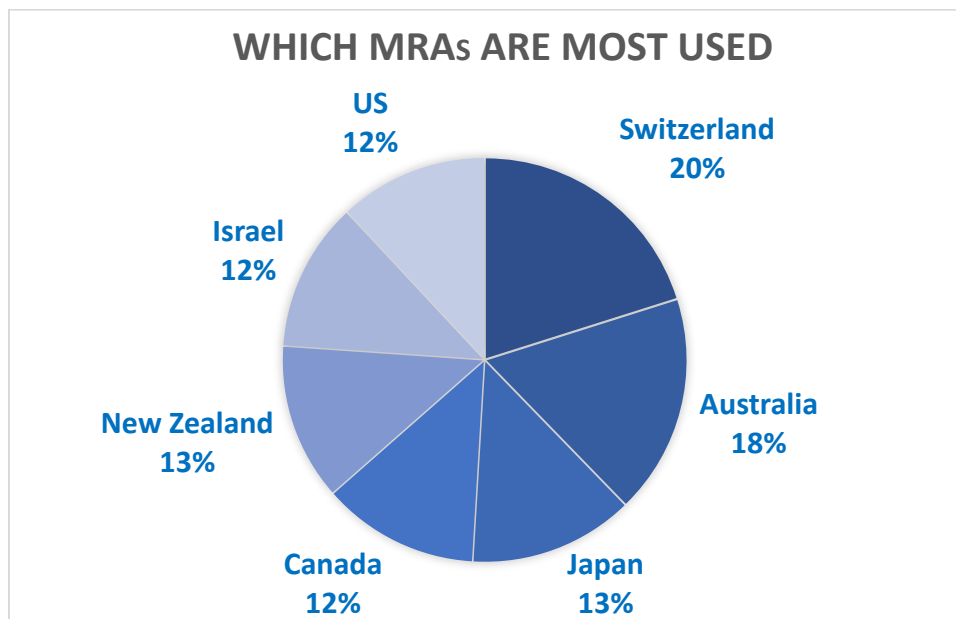


Figure 7. Use of MRAs on Conformity Assessment, per trading partner



A great majority of those respondents using EU MRAs use more than one MRA for exporting their products, meaning that they export to several countries with which the EU has an MRA.

However, a number of respondents indicated they use only the MRA with Switzerland, which is the MRA that appears to be used most (see Figure 7.).

When asked whether they **test** their export products, more than 90% of respondents test at least some products for some markets. Similarly, 80% of respondents **certify** at least some products for some markets. Figures 8. and 9. below indicate the number of responses received per option.

Figure 8. Testing of products

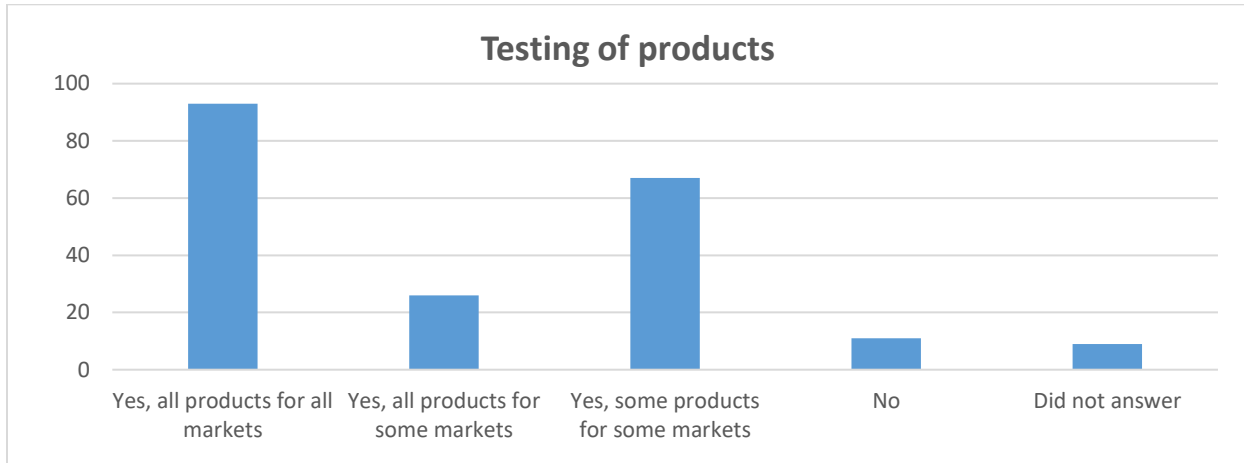
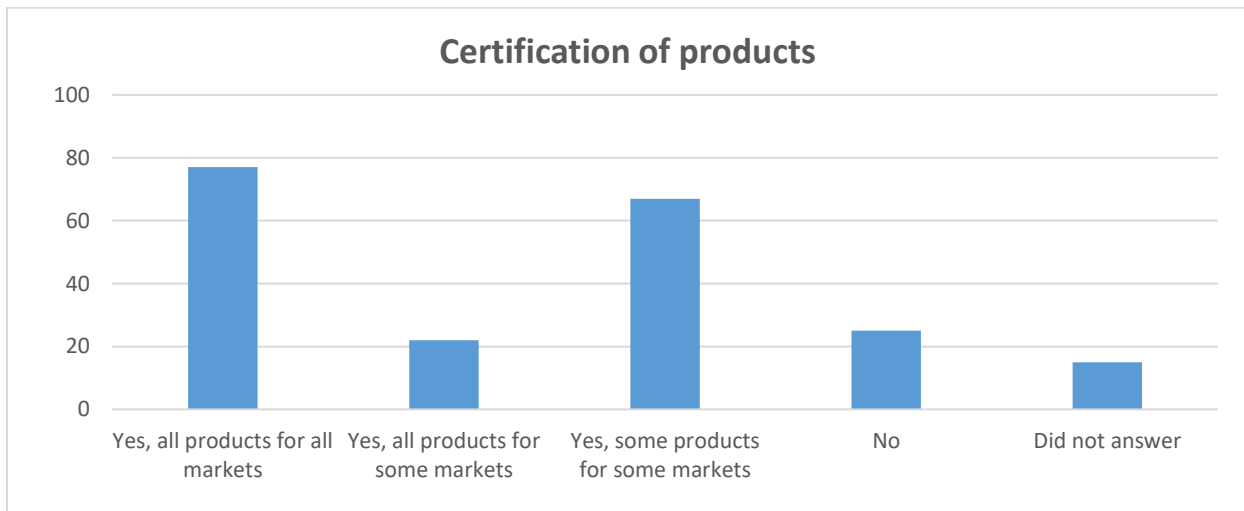


Figure 9. Certification of products



The importance of the EU facilities for testing and conformity is the most important. Only approximately 12% of respondents **test and/or certify their products exclusively outside the EU**, and in the great majority of cases, they do it because it is a legal requirement of the export market (see Figure 10.). This offers another clear indication of the importance of MRAs, as

facilitating instruments for the use of EU conformity assessment and testing facilities for exported products.

Figure 10. Location of services used to export products



The importance of having the possibility to test and certify exported products using EU facilities is justified by a number of reasons. As it can be seen from Figure 11., testing/certifying in the EU is time and cost saving for EU exporters, but there is also a non-negligible element of trust in EU service providers indicated as a factor leading to testing/certifying in the EU. On the other hand, testing and certifying outside of the EU is mainly due to legal requirements imposed by third countries in the export market. However, according to some respondents, testing and certifying EU products in the destination market may, in some cases, facilitate exporting (see Figure 12.).

Figure 11. Reasons for using services in the EU

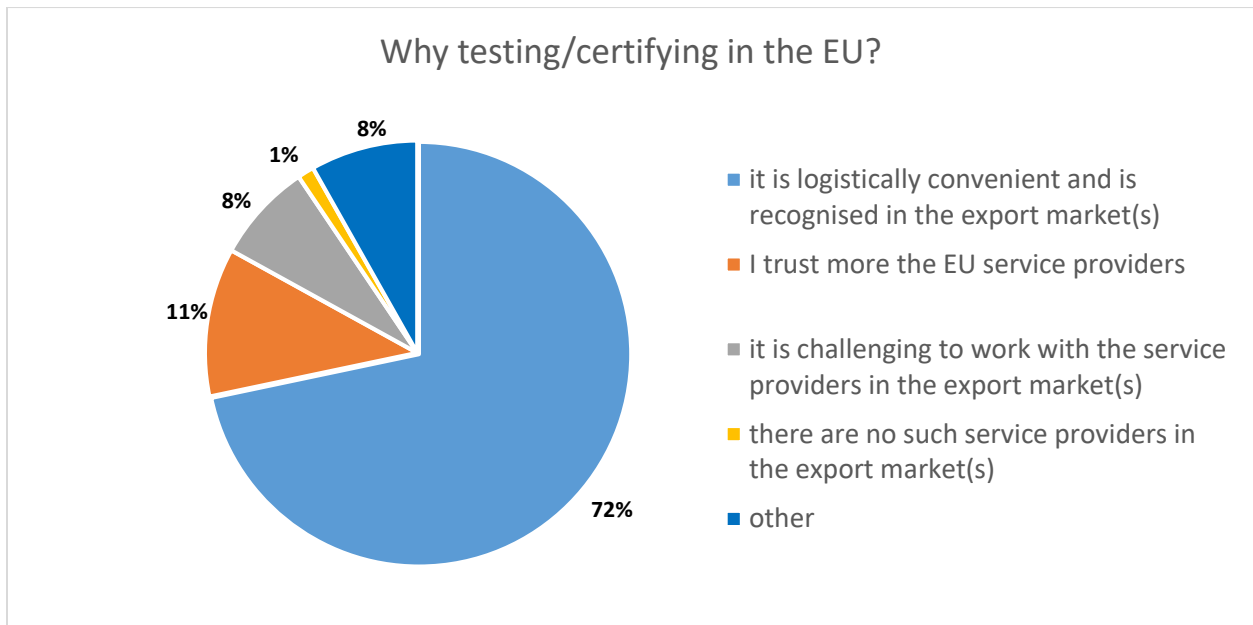
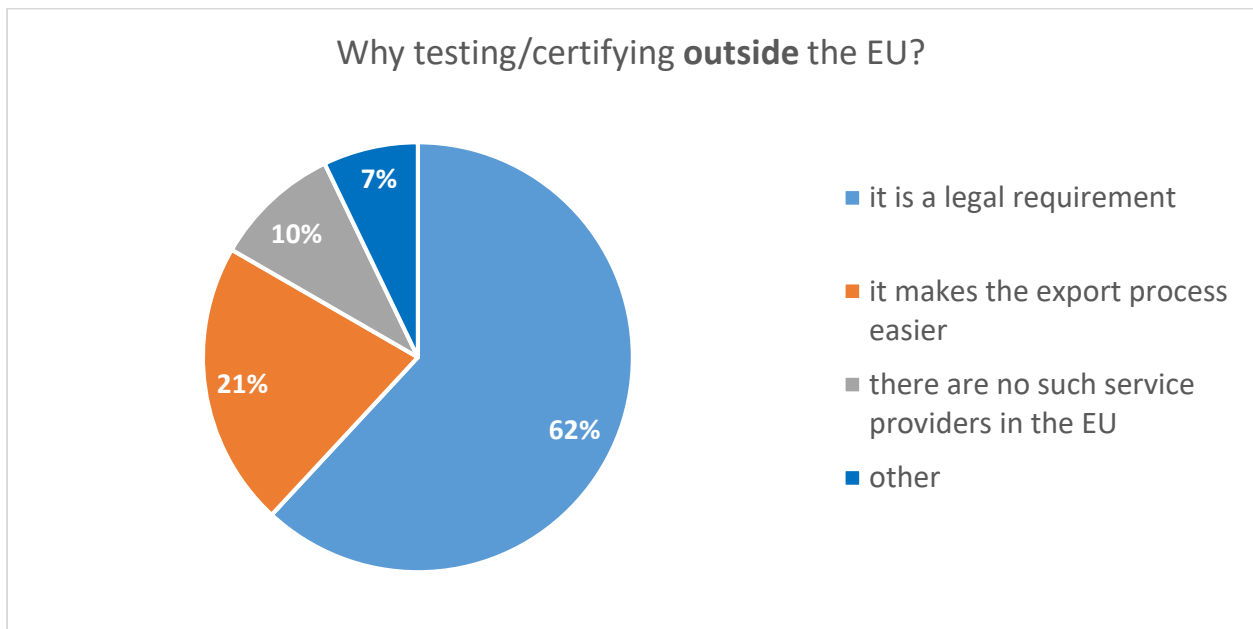


Figure 12. Reasons for using services outside the EU



The survey also contained questions about the importance of digitalisation efforts in the area of certification and conformity assessment. The majority of survey participants (58%) consider e-labelling and digital certificates as having a positive contribution in facilitating compliance with mandatory requirements (Figure 13.). Almost a third of respondents could not indicate what impact such procedures would have on their certification and testing activities, which suggests that more efforts need to be devoted to awareness raising and stakeholder consultations in this important emerging area.

Figure 13. E-labelling and digital certificates

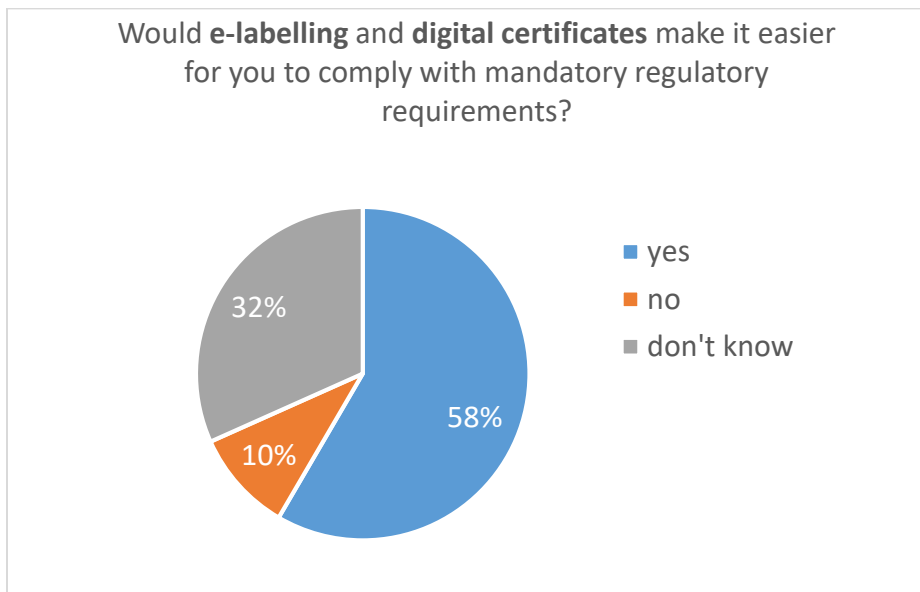
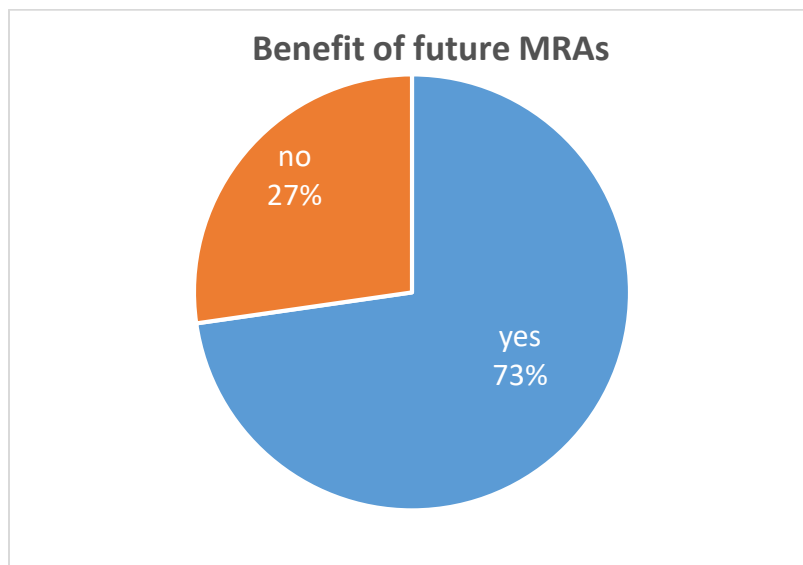


Figure 14. Benefit of future MRAs



One of the main objectives of the MRA survey was to identify business priorities for potential, future MRAs with third countries. The existing evidence indicates that MRAs are useful trade policy instruments that reduce the regulatory compliance costs. A vast majority of survey participants that test/certify their products outside the EU because it is a legal requirement of the export market (73%) indicated that they would benefit from future MRAs (Figure 14.). Given the large spectrum of export destination covered by respondents, the list of potential new MRA partners was very varied and, with some of them, the EU does not have a trade agreement. Among the countries that were mentioned by survey respondents, Switzerland, United Kingdom, USA, China and India featured more prominently.