

Open letter of DSV and KAN on the revision of the European Standardisation Regulation – For a standardisation system that is fit for the future, consensus-based and inclusive

Brussels, 18 March 2026

Dear Director General,
dear Ms Jorna,

European standards ensure that products are safe when they enter the market and that companies in the Single Market have reliable rules and regulations to operate by. The European standardisation system consequently constitutes a key foundation for safety, competitiveness and trust in the Single Market. In the field of occupational health and safety in particular, standards play an important role in ensuring that products, machinery and work equipment are safe by design.

The German Social Insurance European Representation (DSV) and the Commission for Occupational Health and Safety and Standardization (KAN) therefore call on the European Commission to strengthen the proven fundamental principles of the European standardisation system when revising the Standardisation Regulation (EU) No 1025/2012, while at the same time ensuring a high level of health and safety at work.

From our point of view, the following aspects are crucial for an efficient, yet moderate and targeted reform of the European standardisation system:

1. The focus must be on the principle of consensus and on quality

The European standardisation system is based on standards being developed transparently and by consensus among all stakeholders. A solid consensus ensures high technical quality, broad acceptance, reliable results and the necessary legitimacy of the outcomes of the standardisation process. In order for a solid consensus to be reached, particularly in complex, extensive or innovative standardisation projects, the standardisation process requires time. Increased time pressure during the drafting process would put the consensus principle at risk. This could have serious implications, particularly in safety-relevant areas. Measures to speed up the standardisation process must therefore not come at the expense of consensus and, consequently, must not compromise safety and quality.

2. Strengthen the role of the present European Standardisation Organisations

The existing European standardisation organisations play a central role in the standardisation system. They ensure that standards are developed transparently and with the involvement of all relevant stakeholders. We therefore take a critical view of the assignment of standardisation requests to organisations other than the existing standardisation organisations, and also of the adoption of results from other standardisation sources. Such an approach would put the coherence of the entire European body of standards at risk and would make it more difficult or even impossible for societal stakeholders to participate. A regular revision of the list of accredited standardisation organisations, too, may pose risks to the effective participation of

societal stakeholders. Should further organisations be added to the list, it must be guaranteed that they offer the same opportunities for access and participation as the current European standardisation organisations. Furthermore, any expansion of the list must not create an additional burden for societal stakeholders in terms of human, administrative and financial resources.

3. No further obstacles to participation of societal stakeholders

The participation of societal stakeholders and also those involved in occupational health and safety, is a key element of the European standardisation system. They bring their professional expertise into the standardisation process and ensure that their practical experience and knowledge are incorporated into the standards. Already now, however, participation is proving challenging and resource-intensive for societal stakeholders. Under no circumstances must current reform efforts make opportunities for involvement any more difficult. Structures and processes must remain transparent, comprehensible and easy to follow for all stakeholders.

4. Common specifications only as a strictly limited exceptional instrument

We take a critical view of the possibility of adopting common specifications as an alternative to harmonised standards. There is currently a lack of clearly defined application cases, as well as of a transparent and comprehensible process for their development. Transparent procedures to assure the early and effective involvement of all relevant stakeholders are also missing. For common specifications to be widely accepted, it is essential that transparency, participation and technical quality be ensured. This also includes clear provisions on their validity period, amendment, review and withdrawal, in order to enable their reintegration into the regular standardisation process. This should always be the aim. The use of common specifications should consequently be limited to clearly defined exceptional cases. The primacy of harmonised standards must continue to apply without any restrictions.

The European standardisation regulation provides a valuable framework for the European standardisation system. Ensuring its future-proof design and further development is a particular priority for [DSV](#) and [KAN](#) – as set out in detail in our position papers on this topic. The revision of the standardisation regulation should be used as an opportunity to further improve the standardisation system in a targeted manner, making it more flexible and efficient, without compromising its well-established fundamental principles. In this way, it is possible to strengthen a system that has ensured high safety and quality standards, promoted innovation and secured broad acceptance in Europe for many years.

We hope that our position is of interest to you and your work. We would very much welcome the opportunity to discuss this matter further in person.

Kind regards,



Ilka Wölfle
Director of DSV



Dr. Monika Maintz
Director of KAN Secretariat