

Position statement

European Commission call for evidence on the impact assessment of the planned revision of Regulation (EU) No 1025/2012 on European standardisation

July 2025

KAN, the Commission for Occupational Health and Safety and Standardization, welcomes the opportunity to comment on the impact assessment of the revision of [Regulation \(EU\) No 1025/2012](#).

1. The European standardisation system

Regulation (EU) No 1025/2012 forms the central framework for the development of European standards. These standards contribute significantly to the harmonisation of products, services and processes within Europe. They thus make a decisive contribution to the success of the Single Market and to strengthening the EU's competitiveness.

The European standardisation system has proved effective in practice. It is based on such principles as transparency, broad participation by all interested parties and affected stakeholders and the development of standards by consensus. The regulation governs cooperation between European bodies involved in standardisation and thereby ensures, in its current form, that these standardisation principles are observed and retained. KAN considers these principles to be indispensable.

At the same time, the European standardisation system faces new challenges, such as the pace of technology and innovation cycles, growing global competition and the continually widening spectrum of EU legislation. The purpose of a revision of the Regulation should therefore be to improve the flexibility and efficiency of the standardisation system, whilst retaining its proven fundamental principles.

2. Acceleration of the standardisation process

Although it is certainly desirable for standardisation projects not to be excessively protracted, KAN points out that acceleration of the standardisation process should

on no account be allowed to impact negatively on the quality of the results. In order for standards to be of high quality and meet with acceptance in industry, the research community and wider society, they must be based on the broad expertise of a large number of diverse stakeholders. To this end, it must be ensured that sufficient time continues to be allocated to the steps needed to carry the standardisation principles into effect.

With regard to the digitalisation of standardisation processes, care must be taken to ensure that digitalisation measures facilitate the process without limiting, let alone hindering, opportunities for participation.

In addition, a distinction must be drawn between the time frame allocated for the development of technical content in standards committees and that for the review and listing of harmonised standards. KAN's view of the system of HAS Consultants, introduced for the review of harmonised standards, is that it still lacks the required efficiency and entails additional human and structural resources. High formal requirements slow the process down further. Conversely, measures to reduce intransparency and increase the compliance rate could accelerate the process. Standards that have passed the assessment process should be listed in the Official Journal of the EU as swiftly as possible.

According to the impact assessment, the Commission intends to review the list of European standardisation organisations in Annex I to the regulation and possibly issue standardisation mandates to other organisations that it believes might be able to deliver standardisation outcomes more quickly.

KAN points out that this presents considerable risks for societal stakeholders. These stakeholders' opportunities for participation in the many standardisation committee meetings that are potentially relevant to them are already limited. To avoid participation becoming even more difficult, structures and processes must remain transparent. If implemented, extension of the list contained in Annex I must not lead to an additional burden on the administrative and financial resources of societal stakeholders, and must be carried out solely on the basis of clear criteria and conditions. At present, participation of societal stakeholders is enshrined only at the European standardisation organisations. Standardisation mandates would have to be linked even more strictly to defined conditions, particularly with regard to assurance of comprehensive participation of societal stakeholders.

3. Participation of societal stakeholders

An essential asset of the European standardisation system is the participation of societal stakeholders. These stakeholders, which include those in occupational safety and health, contribute their technical expertise to standardisation activity and enable knowledge gained in the field to be transferred to it.

KAN therefore welcomes one of the European Commission's specific objectives for the revision being to improve inclusiveness and ensure a balanced representation of stakeholders. Barriers for societal stakeholders continue to exist and should be eliminated, particularly in cooperation with the national standardisation organisations. Limits to human and financial resources, in particular, are one such barrier. Participation by groups who have no commercial interest in the subject of standardisation but are affected by it should be promoted by opportunities for these groups to participate in the standardisation process at no cost.

In addition, the role of market surveillance in standardisation should be strengthened, thereby enabling formal objections to be avoided proactively and confidence in standardisation to be enhanced.

Furthermore, the process for submitting and examining formal objections, as laid down in Article 11 of Regulation (EU) No 1025/2012, should be reviewed with a view to it possibly being streamlined and thereby accelerated.

Financial support as provided for in Annex III to Regulation (EU) No 1025/2012 has enabled small and medium-sized enterprises and societal stakeholder groups such as consumers, trade unions and environmental protection organisations to gain influence in the standardisation process. However, KAN also points out that even Annex III Organisations have only limited capacity to attend the many committee meetings that may be relevant to them. Furthermore, these organisations do not reflect all sections of civil society affected by the content of standards, such as the employers/operators group.

4. Common specifications

In its Omnibus IV package, the Commission proposes introducing the instrument of common specifications into numerous other Single Market regulations. However, KAN's view is that common specifications should be introduced horizontally in the revised Regulation (EU) No 1025/2012, and not at sectoral level in individual items of legislation. Fragmentation of common specifications will otherwise be unavoidable. KAN further rejects the adoption of mandatory common specifications for reasons of "urgent concern" as proposed in the Omnibus package. It is also vital that harmonised standards always have primacy over common specifications ("exceptional fall-back solution"). To ensure this, the conditions already set out in the Machinery Regulation (EU) 2023/1230 should be adopted.

At present, the intention is for common specifications to be adopted by means of the committee proceedings (comitology). This procedure makes no provision for participation of societal stakeholders. It is therefore unclear how this can be reconciled with the European Commission's goal of making the standardisation system more inclusive and enabling a balanced representation of interests. In

KAN's view, common specifications should not become an instrument that undermines the standardisation system and its principles, such as broad stakeholder participation.

About KAN

In the Commission for Occupational Health and Safety and Standardization (KAN), the German representatives of employers, employees, the federal and state governments and the German Social Accident Insurance Institutions channel their interests and discuss them with DIN (German Institute for Standardization). KAN analyses standards and other outcomes of the work of standards organisations, and where applicable other bodies developing standards, that have a direct or indirect impact upon safety and health at work.

KAN's activities therefore include the monitoring of standardisation activity where it impacts upon occupational safety and health, and also the associated legislative activity in Europe, and drawing attention to needs for action. It is in KAN's interests that regulations and directives set out suitable and coherent statutory provisions and lead to corresponding standardisation mandates.

KAN is registered in the EU Transparency Register with the number **90520343621-73**.

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