

Position statement

European Commission call for evidence on the impact assessment of the planned revision of the New Legislative Framework

August 2025

KAN, the Commission for Occupational Health and Safety and Standardization, welcomes the opportunity to comment on the impact assessment of the revision of the New Legislative Framework (NLF).

The NLF is an element essential for the success of the European Single Market. Since its introduction, it has proved to be a viable legal framework for product safety and the role of standardisation in Europe. KAN therefore calls for the core of the proven NLF system to be retained, and the NLF only adapted to new challenges, such as the digital transformation. As stated in the 2022 evaluation of the NLF, it is of undeniable importance for the creation of coherence within the EU legal framework for products. From KAN's perspective, it is therefore important to ensure that the system remains coherent and practicable in the future.

The value added by the NLF is also appreciated by KAN. The systematic and clear distinction between legislative responsibility and technical standardisation has proved to be a viable basis for the European regulatory system in the Single Market. The structure and its division of responsibilities permits flexible responses to technological developments without a risk of legal certainty or safety standards being compromised. This is also of key importance for occupational safety and health. The division of responsibilities enables technical solutions to be developed and regularly updated in consultation with the stakeholders, including the social partners and statutory accident insurance institutions. At the same time, legal responsibility for the level of protection lies, as before, with the legislator.

Revision of the NLF is linked to the revision of the Standardisation Regulation. KAN therefore advocates close coordination between revision of the NLF and that of the Standardisation Regulation in order to ensure a coherent body of rules.

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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Published: August 2025

With support from the



Federal Ministry
of Labour and Social Affairs

on the basis of a resolution
passed by the German Bundestag