

## CUTTING RED TAPE, AND THE CONSEQUENCES FOR OSH



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## Precision, not blanket solutions

Simplification of regulations and elimination of bureaucracy are currently high on the political agenda, both in the EU institutions and in Germany. Streamlining of bodies of rules and regulations and clearer structuring of competencies are important objectives. Occupational safety and health is one of the areas in which rules and regulations should be simple, comprehensible and practicable. Simplification should, however, be conducted in a way that continues to ensure workplace safety and health.

Efficient and effective occupational safety and health is not a bureaucratic obstacle, but a prerequisite for a strategy that integrates OSH activities into company processes and thereby ensures healthy and high-performing workers and businesses. Occupational accidents and diseases lead to working days being lost and place a burden on companies, social insurance systems and, above all, the affected workers themselves.

Standards and specifications can provide valuable support during the application of statutory provisions. They are indispensable if occupational safety and health measures are to be effective, particularly with regard to safe work equipment. They often illustrate practicable solutions, can be amended more quickly than legislation and offer manufacturers and companies legal certainty by reflecting up-to-date good practice. In view of this, a sweeping deletion of references to standards and specifications from legislation, as called for by the Federal Modernisation Agenda, does not appear constructive. It disparages these references unduly by generalising them as “bureaucracy”. Rather than blanket deletion of references to standards, a judicious approach is required in which standards and specifications are adapted purposefully to the body of rules and statutory regulations. This would ensure that in the sphere of occupational safety and health, bureaucracy is not eliminated at the cost of clarity and certainty. «

# Simplification must not be achieved at the cost of safety

The EU is seeking to reduce red tape and boost its competitiveness. How much simplification, though, can be tolerated in occupational safety and health?

The German Social Insurance (DSV) has published a position paper explaining why Europe's high safety standards must not be compromised in the drive to reduce bureaucracy.

The European Union faces a twofold challenge in the current legislative term: of making Europe more competitive, and at the same time of deepening the Single Market. The European Commission's key objectives for the EU include reducing bureaucracy, increasing innovation and reducing external dependence. The "Omnibus proposals" are an important tool for attaining these objectives. They have the purpose of grouping multiple legislative amendments and simplifying regulatory procedures. How far, though, should simplification be allowed to go? This question is being addressed by the German Social Insurance (DSV) in its position paper, Efficient regulation: Without compromising occupational safety standards<sup>1</sup>.

## Simplification must be proportionate

The DSV's core message is clear: far from being mutually exclusive, high occupational safety standards and a strong European economy are in fact mutually dependent. Good working conditions are a key factor for Europe continuing to be a good business location. They contribute directly to productivity, capacity for innovation and the retention of skilled workers. Occupational safety and health must not therefore be seen as a cost factor, but as an investment. Companies benefit from healthier employees, fewer working days lost due to illness or injury, and higher motivation. Effective occupational safety and health also eases the burden on social security systems and enhances overall economic stability.

For over 30 years, the European occupational safety and health directives have provided a reliable basis for assuring safe working conditions. They define minimum standards and clear responsibilities, whilst at the same time providing Member States with sufficient freedom in their implementation. This combination of binding requirements and flexibility is the reason why the regulatory framework has remained viable to this day and is able to respond to new developments, such as the digital and ecological transformations. At the same time, the regulatory framework must keep pace with change: new forms of work, psychosocial stress, changes in technology and risks posed by climate change all present a need for judicious updating of existing regulations.



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In this context, the European Commission's efforts to make regulatory processes more efficient should not aim to simplify occupational safety and health across the board, but to modernise it selectively where change is actually needed. Furthermore, simplification is not synonymous with deregulation. The body of rules and regulations governing occupational safety and health has contributed significantly to improving working conditions in Europe, and not every regulation is necessarily burdensome. A sound regulatory framework that is geared to the situation in the field leads to dependable planning and legal certainty. Nor should the existing participatory structures be watered down in the quest for simplification and the cutting of red tape: regulatory arrangements that are of high quality and suitable for application in the field can be created only by the involvement of all relevant stakeholders from an early stage. Besides the European social partners, these stakeholders include the social insurance institutions. Not only do they contribute expertise, they can also draw upon an extensive body of data and practical experience in implementation of the regulations. This is crucial, particularly in occupational safety and health, for ensuring that regulations are developed that are effective in the field and meet with wide acceptance.

### **Harnessing the potential of prevention and digitalisation**

A further key aspect is the economic benefit of prevention. Studies have shown that investments in occupational safety and health pay for themselves many times over: on average, a euro invested today will yield an economic benefit of €2.20. Even so, occupational accidents and diseases continue to cause significant costs in the EU, amounting to around three per cent of gross domestic product. Prevention is therefore imperative not only as a social policy, but also for economic reasons. The success of preventive activity in Europe is well documented: the number of occupational accidents is falling, as is the number of fatal accidents. This trend shows that existing measures are effective and should be stepped up.

The DSV also sees considerable potential in digitalisation. Digital technologies and artificial intelligence can help to make occupational safety and health more efficient, to target it better, and to increase its focus on prevention. Analyses of data, for example, can reveal risks at an early stage and enable suitable advice on prevention to be provided. At the same time, digital methods can simplify administrative processes and relieve the burden on skilled workers. However, it is crucial that digitalisation is not used solely to increase efficiency, but is embedded within a modern culture of prevention. Used correctly, it can make an important contribution to strengthening occupational safety and health and competitiveness in equal measure.

### **Implementation remains crucial**

The debate on reducing bureaucracy and enhancing competitiveness will continue to shape EU policy in the coming years. Simplification is an important goal here, but not at any cost.

Besides further development of the regulatory framework, it is crucial that existing regulations be implemented systematically. Occupational safety and health is effective only if rules are actually applied and their observance is monitored. The DSV continues to see a need for action in this area. Clear rules alone are not enough: sufficient resources, purposeful support and Europe-wide programmes are also needed to ensure that rules are implemented effectively in all Member States. At the same time, the objectives of the EU's occupational safety and health strategy, in particular Vision Zero, should be underpinned by measurable progress. Workplace accidents can be reduced significantly if preventive activity is stepped up systematically.

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<sup>1</sup> <https://dsv-europa.de/en/positionspapiere/2026/arbeitschutzstandards.html>

# Deletion of references to standards in legal texts jeopardises legal certainty and efficiency

On 4 December 2025, the German Federal Chancellor and the State Premiers of the German regional governments adopted the Federal Modernisation Agenda<sup>1</sup>. The purpose of this agenda is to make Germany faster, more digital and more capable. However, the agenda's call for references to standards to be deleted from legal texts is not expedient.

Section IX, 2.1 of the Federal Modernisation Agenda calls for references to external (technical) standards to be deleted from legal texts by default (see box). KAN shares the view that legal texts should include references to standards only where these are actually necessary. For example, the German position is that references should not be made to standards that conflict with the criteria stated in the policy paper on the role of standards in the health and safety of workers at work<sup>2</sup> issued by the German Federal Ministry of Labour and Social Affairs (BMAS). In KAN's view, however, the requirement stated in the Federal Modernisation Agenda is not suitable in its current form for application across the board<sup>3</sup>.

## References to standards reduce bureaucracy

Technical standards are the product of the stakeholders' expertise and joint, consensus-based efforts within a transparent process. This process also makes provision for the standards to be updated regularly. Definitions, requirements, recommendations and descriptions of processes are examples of their content. If these standards did not exist, agreement would have to be reached on countless details in individual cases between the parties concerned: product safety test consultants and their clients, suppliers and purchasers of machinery, manufacturers and market surveillance authorities. Far from facilitating agreements between economic operators themselves and between economic operators and the authorities, an absence of standards would considerably increase the effort required to reach these agreements. And were legislation no longer to draw upon supporting documents such as standards, economic operators and authorities alike would lose a reliable benchmark and the legal certainty assured by it.

## The state of the art must continue to be the benchmark for safety standards

A blanket deletion of references to technical standards also carries the risk of the safety standards that are actually implemented, for example in the areas of product and plant safety or measurement and testing technology for risk assessment purposes, failing to keep pace with technical progress. Were this to happen, the legislator would then have to provide detailed specifications himself, for example in the form of regulatory requirements or subordinate documents. This is neither practical nor attainable with reasonable effort. Also, if such alternative benchmarks for the assurance of legal certainty were not available, legal certainty for the affected parties would arise only through legal judgements. In practice, the removal of references to standards from legal texts as called for would increase bureaucracy in the majority of cases or would be accompanied by economic drawbacks.

## High hurdles for alternatives to references to technical standards

Any solution considered in administrative law as a substitute for technical standards (such as ad hoc agreements between contracting parties, detailed

specifications laid down by the authorities or interpretations issued post hoc by the courts) must satisfy the same quality benchmark as that for the development of technical standards: consensus-based work by the stakeholders involving technical expertise, comprehensible and transparent processes and regular updates.

Finally, the deletion of references to technical standards from administrative legislation would not free the economic operators from having to give prudent consideration to technical standards, for example in order to satisfy their obligations to assure safety or to follow generally accepted good practice. In other words, technical standards may continue to be of legal importance even where they do not become binding through references in legislation.

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<sup>1</sup> [www.bundesregierung.de/breg-de/aktuelles/foederale-modernisierungsgenda-2397632](http://www.bundesregierung.de/breg-de/aktuelles/foederale-modernisierungsgenda-2397632)

<sup>2</sup> <https://t1p.de/Policy-paper-en>

<sup>3</sup> [www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/de/2026-03\\_KAN-Position\\_f%C3%B6derale\\_Modernisierungsgenda.pdf](http://www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/de/2026-03_KAN-Position_f%C3%B6derale_Modernisierungsgenda.pdf)

## Measure 79 of the Federal Modernisation Agenda:

### 2.1. Blanket deletion of references to external standards

Technical standards (such as DIN standards) are incorporated into German law either indirectly by the interpretation of legislation, or directly by references, acquiring binding force as a result. Since the possibilities offered by technology – and thus also the technical standards – are constantly evolving, substantive legal obligations are also constantly increasing, in turn placing a growing burden upon businesses and the general public. With the aim of limiting standards to the necessary minimum, the German federal and regional governments are conducting a review up until 30 June 2026 of all references to external technical standards in federal and state legislation, particularly where they concern the construction sector. Such references may be retained only in cases where they are indispensable.

# The end of the “paywall” for standards?

The Malamud ruling and its disruption of the European standardisation system: access to harmonised standards free of charge is taken as a given. Other European countries are responding with public funding or pivoting to certification; meanwhile, DIN is looking to artificial intelligence (AI) and smart data.

Technical standardisation is witnessing a paradigm shift that is placing the standards organisations’ business models in doubt. Ruling C-588/21 P of the European Court of Justice (ECJ) marks the end of an era in which access to harmonised standards was made conditional upon payment of a fee – and not infrequently a high one. The ruling’s legal shock was triggered by the American activist Carl Malamud, who with his organisation PublicResource.org has fought for many years for the principle that legislation and the rules referenced within it must be available to everyone to read free of charge.

In 2024, the ECJ’s judges agreed with Malamud’s reasoning and ruled that harmonised technical standards, such as those specifying safety requirements for toys or elevators, constitute an essential part of EU legislation. They are thus subject to the constitutional requirement that they be transparent. Parties who are obliged to observe rules must also be able to familiarise themselves with them without first having to pay an “entrance fee” to private-sector organisations.

This development is not unique to Europe. In April this year, an American appeals court in Philadelphia ruled on a dispute between the standards organisation ASTM International and the UpCodes service. The court determined that private-sector standards largely forfeit their copyright status as soon as they are incorporated verbatim into state legislation. The principle of “fair use” takes precedence here over the right to commercial exploitation.

## Standards organisations in Europe adopt new strategies

A glance at Europe shows a range of responses among the continent’s countries to the loss of this traditional “paywall”. Slovenia, for example, has acted decisively: in response to the legal development at European level, the Ministry of the Economy, Tourism and Sport decided to partly nationalise funding of the SIST standards institute. Harmonised standards are therefore now cross-funded by tax revenues, enabling them to be made available to the public free of charge.

Standardisation heavyweights such as the British Standards Institution (BSI), AFNOR in France and AENOR in Spain, which had already diversified as service providers before the ECJ ruling, are pursuing a different strategy. Their revenues are now derived from certifications, test marks and comprehensive training provision; little is still generated from the sale of documents in paper or PDF form.

In Scandinavia, Danish Standards in particular is focusing on technological integration. The Danes offer consulting packages for CE marking; provision of the standard’s text is a mere secondary benefit.



### DIN opts for new business models employing AI

DIN, the German Institute for Standardization, is at the heart of this transformation. Marion Winkenbach, Managing Director of DIN Media, DIN's licensing and sales arm, warns against reading too much into the ruling's consequences for business models. The circumstances, she points out, are complex. First, the number of standards affected: of the total of 24,982 European standards under CEN and CENELEC's responsibility in the first quarter of 2026, only 3,614 are classified as harmonised, i.e. produced by one of the European Standards Organizations in response to a European Commission mandate. DIN currently makes 446 of these standards available free of charge on its national platform.

According to Winkenbach, a negative financial impact has not yet arisen, partly because the European standards institutes interpret the ruling narrowly by providing limited access. DIN interprets "access" as meaning that the standards can be read online, but not downloaded or printed out; downloads or printed copies continue to require a licence, for which a fee is charged.

At the same time, DIN is conscious that the mere sale of standards is no longer viable as the primary business model. Customers increasingly do not expect to have to pay for standards, and the Malamud ruling is only reinforcing this expectation. Even before the ruling, DIN was responding to changes in user requirements with a two-pronged strategy, comprising new sources of funding and technological innovations. "Sponsored access" models are a part of this: the standard is paid for by sponsors, such as ministries or industry associations, rather than by end users. These bodies have a vested interest in certain standards being widely adopted.

DIN Media's focus lies on the transition from publisher and content provider to software and data vendor. "We need to offer customers smart means of accessing standards and added value for their application," says Winkenbach. In a digitalised industrial environment, a static, 700-page PDF file is an outdated solution. DIN is therefore looking to artificial intelligence and granular data formats such as XML or ReqIF. An AI assistant based on the Gemini LLM (large language model) is intended to guide users through cascading questions to the desired answer, for example concerning a specific aspect of a standard's application.

Rather than searching laboriously through a collection of standards to find the correct mixing ratios for concrete pipes, users receive the answer from AI, together with a reference to the relevant clauses. The added value is achieved by an increase in search efficiency, and thus shifts from providing access to standards to a selective understanding of them.

Sabrina Butters, Head of Partner Management at DIN Media, sees real demand in this area. Many companies wish to feed standards into their internal, AI-based systems. Unlike its counterparts in Spain and the United Kingdom, DIN is choosing not to enter the certification business, so as not to jeopardise its role as a neutral moderator within the standardisation process.

The Malamud ruling thus forces DIN to re-think parts of its strategy for monetising the approval conferred upon a consensus-based standard by an expert process lasting several years. The challenge is to deliver validated knowledge in machine-readable form. DIN is placing its faith in the intelligence of its data. The approach transforms standardisation into a digital tool; access for readers free of charge is only the beginning. Ultimately, the Malamud ruling could provide the impetus for innovation that standardisation needs in order to prevail in the age of AI and Industry 4.0.

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# Standardisation meets global competition: actively leveraging Europe's strengths

Competition in the sphere of international standardisation is increasing. In key digital fields, such as artificial intelligence (AI) and networked production systems, other players are moving quickly to establish a presence and set the agenda, often before Europe has even agreed on a position. For occupational safety and health, this is not an abstract issue: it is where decisions are being taken on the safety requirements that will take effect in the work systems of the future.

The standardisation systems of the major economic regions differ in their philosophies. The US relies on market-driven standards with state backing. In China, standardisation forms part of the overarching strategy of the country's industrial policy. Europe relies on consensus-based processes in which industry, the research community, the public sector, OSH interests and civil society are involved collectively. The European approach may be slower, but it delivers standards that are compatible with existing regulations, enjoy public confidence and meet with acceptance on export markets. German exports with a value of over €1.5 trillion are based on standards in which DIN is heavily involved. This is not a coincidence: it is the result of a model in whose structure quality and acceptance are firmly embedded.

## Digital fields: where the course is currently being set

Germany is almost unrivalled in its shaping of international standardisation. DIN holds responsibility for 17.1% of ISO secretariats – more than any other country – and at European level is also responsible for 28.7% of CEN secretariats (International Standardisation Barometer<sup>1</sup>). This presence is the product of several decades of consistent participation. It is now under pressure, however, as competition shifts to fields where a need for standardisation arises rapidly and positions adopted at an early stage have a decisive impact. Europe is well positioned in established industrial sectors; in emerging digital fields, however, market competition is keener, and Germany is competing with many other countries that are setting the rules, foremost among them being the USA and China.

In dynamic fields such as these, in particular, the parties setting the substantive guidelines and thus shaping global markets are decided at an early stage. A striking example is ISO/IEC JTC 1/SC 42, the key international committee for the standardisation of AI. This committee is currently developing standards that have a direct impact on industrial applications: requirements concerning AI-assisted decision-making systems, algorithmic risk analysis and the reliability of automated processes in safety-critical environments. At the same time, this international work also forms an important basis for standardisation in Europe, since although the AI Act sets the legal framework in the EU, it specifies its technical requirements through standardisation. To this end, the European Commission has tasked the European Standards Organizations CEN and CENELEC with developing harmonised European standards. These often build upon or make reference to international standards, with the selective addition of European requirements.

This European standardisation work is currently giving rise to standards for high-risk AI systems – explicitly including applications in the workplace. These standards will be of direct relevance to manufacturers and operators, as they specify the requirements that must be met for AI systems to be considered safe and legally compliant.



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It is therefore crucial that occupational safety and health expertise be brought to bear at an early stage in these processes. KAN coordinates the occupational safety perspective in Germany and, through DIN, channels it into European and international standardisation processes. This helps to ensure that safety requirements are given consideration from the outset. This commitment demonstrates the structural contribution made by occupational safety and health interests to the quality and acceptance of standards.

### Occupational safety and health: a structural quality feature

Consideration of product safety aspects is systematic and mandatory in the European standardisation system, to a far greater extent than in many other standardisation systems. In Germany, consideration of the public interest, which includes occupational safety and health interests, is also firmly enshrined in the agreement on standardisation reached between DIN and the German federal government. One result of this is that safety requirements are enshrined in a standard during its development, and not only once technologies have already reached the market and risks have become apparent.

This approach has a demonstrable impact. This is evident, for example, in the European Machinery Regulation and the standards associated with it. Above all, the EN ISO 12100 series of standards on risk assessment is considered internationally to be the benchmark for safety-oriented product design. This successful model is already being applied to new technologies. The standardisation of AI currently in progress demonstrates the importance of occupational safety and health interests having a voice in highly dynamic, digital fields, such as the assessment of algorithmic risks or the safe design of automated decision-making processes in occupational scenarios.

### DIN: translating German expertise into international influence

DIN coordinates German participation on European and international standards committees at CEN and ISO and brings national positions to the table at an early stage. DIN's independence and neutrality are what make it effective in this role; standardisation that is perceived as being interest-driven loses its crucial capital. Trust in the independence of the process is the reason why European standards are accepted in international markets – and why, in the longer term, the European model is more resilient than alternatives under state direction or driven by industry. The fact that Germany maintains this position is not a foregone conclusion: it requires a continuous presence and strategic agenda-setting.

The involvement of occupational safety and health interests is a prime example of how different perspectives can be taken into account constructively during standardisation work. Both within ISO/IEC JTC 1/SC 42 and in the CEN/CENELEC standardisation mandates supporting the AI Act, requirements are being defined in current standardisation of AI systems that directly affect day-to-day working practices in safety-critical environments. KAN's bridging role, particularly in AI-related standardisation, is a clear example of how effective engagement by occupational safety and health representatives can contribute to shaping future digital issues in standardisation.

Ultimately, the standard that prevails is not the fastest, but the one that opens up markets, integrates regulation and engenders trust.

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<sup>1</sup> [www.din.de/de/ueber-normen-und-standards/internationales-normungsbarometer](http://www.din.de/de/ueber-normen-und-standards/internationales-normungsbarometer)  
(in German)

# Crane ropes: calculation of fatigue strength to EN 13001-3-2 is unreliable

The ropes of cranes and other equipment used for lifting loads must be safe in order to prevent loads from falling. However, incidents have repeatedly occurred in which ropes have failed in service despite having been deemed safe during the regular periodic inspection for the period of use concerned. The Subcommittee Cranes and lifting technology of the Expert committee Woodworking and metalworking of the German Social Accident Insurance (DGUV) calls for the European standard for calculations for crane ropes to be withdrawn.



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The service life of ropes is not indefinite and they must be replaced regularly. The deciding criterion for their replacement is attainment of the end of the service life, which marks the point beyond which the rope can no longer be used safely. For cranes, Section 14 (2) of the German Ordinance on industrial safety and health (BetrSichV) and Section 26 of the accident prevention regulation for cranes (DGUV Regulation 52/53) require a periodic inspection to be performed by a competent person. During this inspection, the rope is checked for visible damage that would require its replacement. The view of OSH experts is that the result of the regular periodic inspection must verify that the rope is sufficiently safe for hazards to persons to be ruled out for the duration of the pending period of operation.

The criteria for mandatory discarding of a rope are described in ISO 4309, Cranes – Wire ropes – Care and maintenance, inspection and discard. This standard states forms of damage that necessitate the rope's immediate replacement. Reasons for immediate discarding of the rope include a certain number of visible wire breaks in

the outer strands (bundles of wires). These wire breaks are caused by material fatigue when the rope is guided over sheaves, causing it to be repeatedly bent.

Premature rope failures have particularly occurred in practice when a small ratio of the sheave diameter (D) to the rope diameter (d) is combined with high-strength ropes (wire tensile strength  $\geq 2160$  MPa and number of strands  $\geq 8$ ). The periodic inspections had failed to indicate that these ropes would reach the end of their service life during the pending operating period and that their load-bearing capacity was no longer sufficient.

### Research project provides clarity

The German Social Accident Insurance Institution for the woodworking and metalworking industries (BGHM) was tasked by the DGUV with conducting a research project to determine the reasons for the ropes' premature failure. This project had the following objectives:

- To study the correlation between small bending diameters and the incidence of wire breaks in the inner strands of high-strength ropes

- To determine limits for the D/d ratio at which it is guaranteed that wire breaks occur in the outer strands, thereby permitting their timely detection.

The tests showed that, with use of relatively small sheaves (low D/d ratios), the ropes attained fewer bending cycles on the testing machine before failure than is predicted by the calculations to EN 13001 Part 3-2, Limit states and proof of competence of wire ropes in reeving systems.

Further calculations of the attainable number of bending cycles were subsequently performed in accordance with ISO 16625, Cranes and hoists – Selection of wire ropes, drums and sheaves. These calculations all erred on the safe side: the number of bending cycles predicted by the calculation at the attainment of which the rope would reach the end of its service life was therefore lower in this case than the actual number of bending cycles attained on the test machine.

For this reason, the DGUV's Subcommittee Cranes and lifting technology recommends that EN 13001-3-2 be withdrawn. The method described in this standard for proof of the fatigue strength does not yield reliable calculation results for small D/d ratios in combination with high-strength ropes. It is recommended that the service life for ropes be calculated in accordance with ISO 16625.

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# Practical tips for standards development work

Participation on standards committees at national, European and international level is an opportunity to join in actively shaping standards, and thus to promote safe working conditions. Occupational safety and health needs committed experts to ensure that OSH requirements are considered early – and effectively – in the standardisation process.

Standardisation processes follow clearly defined steps. Beginning with the idea and formulation of a preliminary proposal, they progress through the draft standard phase to final voting and publication of the standard in its final form (see figure). Purposeful and effective action requires familiarity with the individual steps of the standardisation process and the opportunities to influence it at each stage. The same applies to the various functions within standardisation: delegates in European and international meetings present the positions agreed in the national mirror committee. Conversely, experts in working groups present their own professional opinion and are not bound to the national position. The technical work in the committees is organised and overseen by committee chairs and project managers, and at European and international level by convenors, secretariats and project directors.

Participants must also be familiar with the various types of document of the standards organisations at national, European and international level, and be able to assess their suitability for the subject matter that is to be addressed. Not all document types are suitable for requirements in the sphere of occupational safety and health, for example<sup>1</sup>.

## Shaping content through active involvement

Work on the standards committee offers the greatest scope for influencing the standard, as this is where the priorities of the technical work are defined and comments discussed. Active involvement in drafting the text provides an opportunity for safety and health concerns to be presented – at the source, so to speak. Clearly formulated factual arguments increase the prospects of a contributor's own position being adopted at national level, and also being considered in the subsequent stage in discussions at European and international level.

Standards are produced first and foremost by the precise formulation of texts. Effective participation requires documents to be read thoroughly and desired amendments to be formulated clearly. Comments should be reasoned explicitly and comprehensibly, and should always include a suggestion for alternative wording. The requirements in standards must be suitable for application, unambiguous, and verifiable. Standards should reflect the state of the art; their purpose is not to promote competition. Advertising, covert preference for certain products or statements that raise antitrust issues must be avoided under all circumstances. If possible, participants should work continually in the standards committee for a longer period (or at least for the duration of a standardisation project) in order to



Sign up to the **seminar on principles of standardisation work in occupational safety and health** (in German) to learn more about how standardisation works, its significance, and the opportunities available to OSH representatives to exert influence. This year's seminar will be held in **Sankt Augustin** from **22 to 24 September 2026** (for details, see "In brief").



Visit [www.kan.de/en/knowledge/principles-of-standardisation](http://www.kan.de/en/knowledge/principles-of-standardisation) to read more about how European and international standards are produced and what opportunities exist for exerting influence. The KAN Secretariat also offers a short online training course for small groups of OSH experts.



Should you have any questions concerning standardisation work relating to occupational safety and health or require support with standardisation work, the KAN Secretariat will be happy to provide advice and assistance.

foster a spirit of cooperation. The objective should always be for a consensus to be reached between all parties involved; recourse should be made to voting only in exceptional cases.

Should efforts to assert OSH interests by committee work and comments during the public enquiry be unsuccessful, the option exists in Germany of invoking the unanimous vote<sup>2</sup>. If the criteria for the unanimous vote are met, DIN is not able to adopt a position that conflicts with that of the occupational safety and health representatives. This means, for example, that DIN cannot support a standard at European level when the OSH representatives have adopted a unanimous position against the standard in question.

**Networking often yields success**

Standardisation work never takes place in a vacuum. Representatives present the perspectives of their organisations or companies. It is advantageous for them to reach agreement internally, both on technical content and on issues of strategy. This yields consistent positions that strengthen the case they make on the committee and avoid conflicts in subsequent stages.

Consensus-building is also of key importance at European and international level. Different cultures, technical approaches and national interests converge. A respectful attitude makes it easier to find allies and develop solutions together. Consequently:

- Show a willingness to compromise, without sacrificing key safety requirements.
- Make your points objectively and avoid unnecessary conflicts.
- Ensure that your contributions are clear, neutral and well reasoned.

Standardisation work is teamwork. Technical alliances – at both national and international level – make for a more compelling case. Informal discussions, bilateral agreements and pooling of experience between working groups are conducive to constructive solutions being found to tricky technical issues. Reliable partnerships are of great benefit, particularly for complex occupational safety and health issues.

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<sup>1</sup> You can find more information at [www.kan.de/en/topics/what-we-do/standardisation-policy/fast-track-standardization-documents](http://www.kan.de/en/topics/what-we-do/standardisation-policy/fast-track-standardization-documents) and in the KAN position paper on fast-track standards documents at [www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/en/2024-05-22\\_KAN-Position\\_normungsaeahnliche\\_Dokumente-en.pdf](http://www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/en/2024-05-22_KAN-Position_normungsaeahnliche_Dokumente-en.pdf)  
<sup>2</sup> [www.kan.de/fileadmin/Redaktion/Dokumente/Basisdokumente/de/Deu/2020-08\\_Auslegung\\_der\\_DIN\\_820\\_in\\_besonderen\\_Faellen.pdf](http://www.kan.de/fileadmin/Redaktion/Dokumente/Basisdokumente/de/Deu/2020-08_Auslegung_der_DIN_820_in_besonderen_Faellen.pdf) (in German)

**Stages in the standards development process**



## KAN publishes position paper on European Agile Specifications

CEN and CENELEC, the European standards organisations, are planning to introduce a new standardisation product: the European Agile Specification (EAS). The purpose of the EAS is to make technical specifications available within a shorter development timeframe. According to the proposal, the new format will potentially give rise to the presumption of conformity. The objective is to permit a swifter response to new regulatory requirements and those arising from the market and technology.

To this end, the European Commission is seeking to implement accelerated procedures that are suited to rapid innovation cycles. It has also created a fallback solution, the Common Specifications, for the event that harmonised standards are insufficient or do not exist at all. Furthermore, it is considering drawing upon outcomes of organisations beyond the established European Standards Organizations. In this context, CEN/CENELEC has presented the EAS to the Commission as an additional option for shortening the development times of standards. EASs are to be created within the existing European standardisation system, and are to be capable of giving rise to a presumption of conformity.

In its position paper on accelerated standardisation processes at CEN/CENELEC and the European Agile Specification, KAN states clearly that a presumption of conformity may be triggered only by European standards in the narrow sense, as these alone are able to ensure that the proven principles of standardisation are observed, such as consensus-building and the participation of all stakeholders. EASs are not suitable for this purpose.

KAN position paper on EASs: [www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/en/2026-03-KAN\\_Position\\_European\\_Agile\\_Specifications-en.pdf](http://www.kan.de/fileadmin/Redaktion/Dokumente/KAN-Positionen/en/2026-03-KAN_Position_European_Agile_Specifications-en.pdf)

## Newsletter on standardisation in the field of artificial intelligence

The Artificial Intelligence Standardisation Inclusiveness Newsletter regularly publishes comprehensive information on the progress of standardisation activity in the area of artificial intelligence (AI), for example where conducted in EU bodies, the CEN and CENELEC JTC 21 Joint Technical Committee, the ISO and IEC technical committees (particularly ISO-IEC JTC 1 SC 42) and other relevant bodies.

The newsletter is published by the Inclusiveness working group of JTC 21 at CEN and CENELEC, whose aim is to facilitate participation by relevant stakeholders in standardisation in the field of AI. The secretariat is hosted by the European Trade Union Confederation (ETUC).

To subscribe to the newsletter and access all previous issues, visit: [www.etuc.org/en/artificial-intelligence-standardisation-inclusiveness-newsletter](http://www.etuc.org/en/artificial-intelligence-standardisation-inclusiveness-newsletter)

## KAN seminar on the principles of standardisation work

The seminar on the principles of standardisation work in occupational safety and health is intended for anyone working in standards committees or seeking to become involved with standardisation in the interests of safety and health. It will be held this year **from 22 to 24 September** in **Sankt Augustin** (in German).

This seminar familiarises participants with the procedures for standards development and the opportunities available to them to exert influence at the various phases. It covers the drafting and revision of standards, legal aspects such as harmonisation and the presumption of conformity, and also globalisation and current trends in standardisation. Valuable advice will be provided, such as on searching for information on standardisation and standards. The seminar is also a good opportunity for networking with other experts.

Part of the seminar will be held in the machinery workshop and the facilities for personal protective equipment at the Institute for Occupational Safety and Health of the DGUV (IFA). Participants will learn there with reference to specific examples how the requirements of standards are implemented in practice.

The seminar will be held jointly by the DGUV Academy and KAN. To register, visit: [https://asp.veda.net/webgate\\_dguv\\_prod](https://asp.veda.net/webgate_dguv_prod), seminar number 570044

## BDA position paper on standardisation in the field of human resources management

The Confederation of German Employers' Associations (BDA) has published a position paper addressing the growing difficulties presented by standardisation in the area of human resources management. The number of standardisation projects addressing such policies and occupational safety and health is increasing. The content of the resulting standards encroaches time and again into an area that in Germany is the preserve of the social partners and enjoys constitutional protection. The BDA's paper also points out that technical standardisation follows principles that differ fundamentally from those for the formulation of collective agreements or human resources management within companies: solutions for the latter are far more bespoke and wholly unsuited to standardisation. The BDA calls for a number of measures to address this issue:

- Provision by DIN of support to both of the social partners during standardisation processes
- Recognition by DIN of employers' associations as a stakeholder in their own right, as is already the case for the trade unions
- Establishment of a body along the lines of KAN for monitoring and intervention in the standardisation of human resources management

The position paper can be accessed (in German) at: [https://t1p.de/BDA\\_HRmanagement](https://t1p.de/BDA_HRmanagement)

# Events



14.-15.07.26 » Nürnberg

Seminar

## Gesetze, Normen und Vorschriften für die Technische Dokumentation

VDI

[www.vdi-wissensforum.de/weiterbildung-maschinenbau/technische-dokumentation-gesetze-normen](http://www.vdi-wissensforum.de/weiterbildung-maschinenbau/technische-dokumentation-gesetze-normen)

25.08.26 » Online

Seminar

## Praktische Umsetzung der Druckgeräterichtlinie

DIN Media

[www.dinmedia.de/de/online-seminar/praktische-umsetzung-der-druckgeraeterichtlinie/107205806](http://www.dinmedia.de/de/online-seminar/praktische-umsetzung-der-druckgeraeterichtlinie/107205806)

31.08.-01.09.26 » Hybrid/Köln

Seminar

## EU-Maschinenverordnung (EU) 2023/1230

MBT

[www.maschinenrichtlinie.de/fortbildung/seminare/maschinenverordnung](http://www.maschinenrichtlinie.de/fortbildung/seminare/maschinenverordnung)

31.08.-02.09.26 » Dresden

Seminar

## Kollege Roboter: Mensch-Maschine-Kollaboration und die Sicherheit bei der Arbeit

DGUV Akademie

[https://asp.veda.net/webgate\\_dguv\\_prod \( 570164\)](https://asp.veda.net/webgate_dguv_prod ( 570164))

08.-09.09.26 » Berlin

Seminar

## CE-Kennzeichnung im Maschinen- und Anlagenbau

VDI Wissensforum

[www.vdi-wissensforum.de/weiterbildung-maschinenbau/ce-kennzeichnung](http://www.vdi-wissensforum.de/weiterbildung-maschinenbau/ce-kennzeichnung)

14.-15.09.26 » online

Seminar

## Elektrische Sicherheit nach der EU-Maschinenverordnung

MBT

[www.maschinenrichtlinie.de/fortbildung/mbt-seminare/elektrische-sicherheit-von-maschinen-und-anlagen](http://www.maschinenrichtlinie.de/fortbildung/mbt-seminare/elektrische-sicherheit-von-maschinen-und-anlagen)

16.09.26 » Online

Arbeitsmedizinisches Online-Kolloquium

## Atenschutz

Institut für Prävention und Arbeitsmedizin der DGUV

[www.dguv.de/ipa/lehre/fortbildung/index.jsp](http://www.dguv.de/ipa/lehre/fortbildung/index.jsp)

16.09.26 » Online

Informationsveranstaltung Dresdner Treffpunkt

## Woche der Klimaanpassung – Klimaanpassung und Arbeitsschutz

BAuA

[www.baua.de/DE/Angebote/Veranstaltungen/Termine/2026/09.16-Dresdner-Treffpunkt-Klima](http://www.baua.de/DE/Angebote/Veranstaltungen/Termine/2026/09.16-Dresdner-Treffpunkt-Klima)

17.-18.09.26 » Friedrichshafen

Herbstkonferenz

## Menschengerechte Arbeitswelten

Gesellschaft für Arbeitswissenschaft (GfA)

[www.gesellschaft-fuer-arbeitswissenschaft.de/veranstaltungen\\_herbstkonferenzen-gesellschaft-fuer-arbeitswissenschaft-gfa.htm](http://www.gesellschaft-fuer-arbeitswissenschaft.de/veranstaltungen_herbstkonferenzen-gesellschaft-fuer-arbeitswissenschaft-gfa.htm)

22.09.26 » Wuppertal

15. Sicherheitswissenschaftliches Kolloquium/

18. VDSI-Forum NRW 2026

## 40 Jahre „New Approach“ und „Soziale Dimension“ – 30 Jahre Arbeitsschutzgesetz und SGB VII „Gesetzliche Unfallversicherung“ – Erfolg durch Prävention

Bergische Universität Wuppertal

<https://suqr.uni-wuppertal.de/de/foren>

22.-24.09.26 » Sankt Augustin

Seminar

## Grundlagen der Normungsarbeit im Arbeitsschutz

DGUV Akademie/KAN

[https://asp.veda.net/webgate\\_dguv\\_prod?CallID=VeranstaltungsDetail;9E9B103F-2403-43ED-A72C-DDE026BAA355](https://asp.veda.net/webgate_dguv_prod?CallID=VeranstaltungsDetail;9E9B103F-2403-43ED-A72C-DDE026BAA355)

23.-24.09.26 » Essen

Seminar

## Beschaffungsprozesse aus Betreibersicht – Maschinensicherheit in der Praxis

Haus der Technik

[www.hdt.de/beschaffungsprozesse-aus-betreiber-sicht-maschinensicherheit-in-der-praxis-1387](http://www.hdt.de/beschaffungsprozesse-aus-betreiber-sicht-maschinensicherheit-in-der-praxis-1387)



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