

Position Paper

Regulation (EU) No 1025/2012 on European Standardisation

Executive summary

European standards are a cornerstone of EU product legislation, providing legal certainty, supporting innovation and enabling the free movement of goods in the Single Market. For EUnited's sectors—municipal equipment, cleaning equipment and vehicle wash systems— the revision of the Regulation on European standardisation should focus on strengthening and enhancing the effectiveness of the European Standardisation System while preserving legal certainty for economic operators, market-driven development of standards and alignment with international standardisation.

In this context EUnited key recommendations are:

- Keep **harmonised standards** as the preferred and default tool for supporting EU legislation. Avoid parallel mechanisms that may divert resources from standardisation work.
- Use alternative **European standardisation deliverables** (TS, TR, Agile Specifications) **when harmonised standards are not available**, and reserve **common specifications as a strict last resort**.
- **Do not expand Annex I** to recognise additional European standardisation bodies; this would risk fragmentation, duplication and increased costs, and would ultimately weaken Europe's position in international standardisation.
- Improve **consistency, transparency and predictability in harmonised standards assessments**, with stable criteria, timely feedback from consultants and Commission desk officers, proper resourcing and ensure timely harmonisation so that industry can rely on up-to-date standards.
- Prioritise **early planning of standardisation needs** during legislative drafting, ensuring realistic timelines and structured engagement with stakeholders.
- Continue **digitalisation and process simplification** within European Standardisation Organisations to support timely delivery of standards.
- Reduce **financial and administrative barriers to participation in European and international standardisation**, through tax incentives and support for SMEs and industry associations.
- Strengthen **European coordination and influence** in ISO and IEC, including support for European experts and secretariat roles.
- Support **training, skills development and generational renewal** to ensure a sustainable standardisation expert base.
- Maintain the Standardisation Regulation as a **separate legislative act**, while ensuring full coherence with the New Legislative Framework and the EU market surveillance revision.

Guiding principles for the revision of the Standardisation Regulation

European standards play a crucial role in ensuring legal certainty, supporting innovation and enabling effective market access within the EU Single Market. Harmonised European Standards, in particular, provide a presumption of conformity with essential requirements of EU legislation, reducing administrative burden and legal uncertainty for economic operators.

EUnited represents sectors that are inherently international, with members designing, manufacturing and placing products on both EU and global markets. Alignment between European and international standards developed by ISO and IEC is therefore essential to support competitiveness, facilitate global trade and avoid unnecessary fragmentation.

The revision of Regulation (EU) No 1025/2012 should therefore aim at strengthening the European Standardisation System so that it continues to effectively support EU policy objectives while remaining market-driven, inclusive and internationally relevant.

The revision of the Regulation should also remain coherent with the New Legislative Framework (NLF) and the EU market surveillance Regulation. EUnited supports the coordinated revision announced by the European Commission under the forthcoming European Product Act. At the same time, as the Standardisation Regulation addresses broader governance and aspects related to the European Standardisation Organisations, EUnited considers that standardisation should be addressed in a separate piece of legislation from the NLF and market surveillance, while maintaining overall coherence.

Strengthen the European Standardisation System, do not fragment it

The European Standardisation System is a well-established framework built around three European Standardisation Organisations with clearly defined responsibilities and effective cooperation mechanisms among themselves and with relevant international standardisation organisations. It provides a stable and coherent basis for the development of standards that support industry in meeting EU legal requirements and align with international standardisation.

Proposals to recognise additional European standardisation bodies under Annex I risk introducing overlaps, increasing complexity and fragmentation. Allowing multiple standardisation bodies to develop European standards in the same technical areas would most likely increase costs for industry and other stakeholders, stretch already scarce expertise and undermine the overall coherence of the European standardisation system. Such an approach would also undermine one of the stated objectives of the revision of the Regulation: strengthening Europe's influence in international standardisation, in particular, within ISO and IEC. Promoting new or parallel standardisation structures outside the established European Standardisation Organisations would create bodies that, by design, have no direct international counterparts. This would further fragment the standardisation landscape and ultimately weaken Europe's ability to shape international standards.

Any revision of Regulation (EU) No 1025/2012 should therefore focus on strengthening and enhancing the effectiveness of the existing standardisation framework, rather than multiplying the number of standards bodies and developing alternatives to the current system.

Delivering standards that support legislation effectively

While speed is often highlighted in current discussions on standardisation, the primary objective should be timely delivery and fitness for purpose. Good quality standards are essential to enable effective compliance by industry and to deliver the intended outcomes of EU legislation.

Increasing numbers of legislative initiatives with short implementation deadlines, place significant pressure on a standardisation system that relies on a limited pool of experts and resources. Legislative timelines should therefore be realistic and consider the time needed to develop robust standards.

It should also be pointed out that approaches such as public procurement procedures or increased reliance on common specifications are unlikely to deliver faster or better outcomes and risk duplicating work and fragmenting the system.

To improve the responsiveness of the European Standardisation System the following practical measures should be prioritised:

- **Earlier planning at the legislative proposal stage with the tools needed for implementation, including standards, considered from the outset** and particularly for new legislation or when updated legislation introduces new requirements. Starting preparatory standardisation work in parallel with legislative drafting, supported by early structured interaction between policymakers, industry and standardisation bodies, would help avoid delays in the development of standards.
- **Greater consistency and predictability in harmonised standards (HAS) consultant assessments**, supported by stable and transparent criteria, timely feedback and adequate resources. This should help avoid variability linked to individual interpretations. Communication should also be strengthened through early and continuous involvement of the relevant European Commission desk officers —complementing the role of HAS consultants- via structured feedback with Technical Committees. Introducing earlier, informal exchanges or pre-checks during the drafting process with the Commission and HAS consultants would help identify potential issues before the final vote, reduce the risk of standards not being cited despite positive assessments and, avoid unnecessary delays in harmonisation
- **Further streamlining and digitalisation within the European Standardisation Organisations (ESOs)**, including simplified procedures, enhanced digital drafting tools for and more flexible Technical Committee processes to accelerate delivery while preserving quality and inclusiveness. Additional measures could involve decoupling translations from the formal development timeline and shortening the final formal voting period. Allowing targeted post-vote technical corrections to

address HAS consultant comments where these do not affect the substance of the standard could also prevent the need for full re-voting and help speed up harmonisation.

Harmonised standards should remain the preferred option

Harmonised European Standards (hENs) should remain the preferred instrument for supporting EU legislation. They play a central role in ensuring legal certainty for economic operators and enable consistent implementation across the Single Market. Developed through an open, transparent and consensus-based process, hENs reflect market-driven technical expertise and ensure the effective involvement of all relevant stakeholders.

Where harmonised standards are not available yet or cited, priority should be given to alternative deliverables developed within the European Standardisation System, such as non-harmonised European Standards, Technical Specifications or the newly introduced concept of European Agile Specifications. Developed within a framework already familiar to stakeholders, the use of these deliverables would ensure coherence, effective participation and alignment with international standardisation, while avoiding the need for new or parallel processes. They can also serve as stepping stones towards fully fledged harmonised standards.

Common specifications should remain a measure of last resort, developed only under strict, transparent and objective criteria with full stakeholder involvement. This approach is consistent with the ongoing discussions in the context of the Digitalisation Omnibus, where both the European Parliament and the Council have emphasised the need for stricter conditions and safeguards governing the use of common specifications, to preserve the integrity of the European Standardisation System and stakeholder involvement. Over-reliance on common specifications may also unintentionally incentivise disengaging from standardisation activities to promote alternative approaches perceived as more advantageous in the short term.

Participation, access and skills

Effective participation in standardisation is essential to ensure that standards reflect market realities, support innovation and remain globally relevant. However, access to standardisation remains uneven across Member States, with participation in national mirror committees free in some countries but subject to varying fees in others. While these differences often reflect National Standardisation Bodies' business models, they should not create barriers to engagement.

Targeted financial support measures should be strengthened, including tax incentives—already implemented in some Member States, such as France—and dedicated grants or reduced fees for European industry associations, which play a key role in aggregating expertise and representing SMEs. Travel and accommodation costs, particularly in international standardisation activities where expenses are proportionally higher, should also be supported. This would help ensure strong and consistent European participation in international fora, which is essential to safeguarding European interests in international standardisation.

Long-term participation requires sustained expertise within the standardisation community. Targeted training programmes, mentorship schemes and initiatives to support generational renewal and ensure effective knowledge transfer between experienced experts and new participants, should be further developed.

Moreover, clearer, more accessible information on standards and their content—such as concise summaries of standards and technical committee activities—would support informed participation by helping companies identify relevant work and determine appropriate levels of involvement.

Finally, recent jurisprudence of the Court of Justice of the European Union has highlighted ongoing challenges related to access to harmonised standards. Practical and balanced solutions are needed to ensure accessibility of standards supporting EU legislation, while preserving cooperation with international standardisation bodies.

Strengthening European influence in international standardisation

A strong and coordinated European presence in international standardisation is essential to promote European values, regulatory approaches and European industry interests. Europe's influence in international standardisation depends on the strength and coherence of the European standardisation system.

Ensuring effective participation of European experts and securing secretariat roles within international bodies should be a strategic priority. This requires dedicated financial and organisational support, as well as closer coordination among European National Standards Bodies to promote European candidates and align positions. The continuation of the High-Level Forum on European Standardisation from 2026 could provide a strategic platform to facilitate such coordination, strengthen Europe's influence in global standardisation, and monitor progress effectively.

EUnited is the European association representing manufacturers of municipal equipment, professional cleaning machines and vehicle wash systems. It brings together more than 60 member companies in 16 European countries.

Contact: Maitane Olabarria (m.olabarria@eu-nited.net)