

ECOS input on the proposal for amendment to Regulation (EU) No 1025/2012 on European standardisation

ECOS supports improvements on good governance principles in the European Standardisation System (ESS). While progress has been made on stakeholder participation and inclusiveness by some European Standardisation Organisation (ESOs) since the adoption of Regulation (EU) No 1025/2012, under-represented stakeholders still face limitations. Effective participation remains challenging, notably in national and international standardisation.

The text of the proposed amendment rightly refers to the need for balanced participation of stakeholders in standardisation, e.g.:

- “when the European standardisation organisations should focus on supporting EU legislation and policies, safeguards are needed to ensure sound procedure and a balanced representation of stakeholders’ interests, in line with the strategic priorities and legislative needs”
- “the internal governance of the European standardisation organisations must duly take into account the views of all European stakeholders (including small and medium enterprises and civil society organisations). This is even more pertinent given that some European standardisation organisations are mainly composed by economic operators who have voting rights and the participation of civil society organisations and public authorities is limited in some cases.”

Regrettably, the proposed modification to Article 1 does not sufficiently reinforce the push for National Standardisation Bodies (NSBs) to “encourage and facilitate the participation of stakeholders” as already foreseen in Regulation (EU) No 1025/2012. ECOS would therefore propose an addition to the revised Article 1, as follows:

2a. Each European standardisation organisation shall ensure that the following decisions concerning European standards and European standardisation deliverables referred to in paragraph 1 are taken exclusively by representatives of the national standardisation bodies – **having facilitated participation in and consensus on those decisions among all interested national stakeholders** - within the competent decision-making body of that organisation: (...)

We acknowledge the central role of NSBs in standards-making, which must actively ensure societal stakeholder participation - this is not yet the case. Proactive support by national governments, NSBs, international bodies and the European Commission is needed to ensure societal stakeholders enjoy the same access as industry, to get involved in standardisation decision-making processes, and have a voice when standards are developed in public interest areas, including under the ISO London Declaration.