

# European standards: Inclusive, fit for purpose, and environmentally ambitious

## Revision of the EU's Standardisation Regulation

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As acknowledged in the European Standardisation Strategy, “ambitions towards a climate neutral, resilient and circular economy **cannot be delivered without European standards** on testing methods, management systems or interoperability solutions.” European standardisation is a key enabler of the green and digital transitions, and it therefore plays a strategic role in achieving the EU’s climate, industrial, and environmental objectives.

Adopted in 2012, the Standardisation Regulation R1025 has made progress towards a more inclusive, transparent, and effective European Standardisation System (ESS). The Regulation has been instrumental in setting framework requirements for the functioning of the ESS. It has also been crucial in defining the roles, responsibilities, and conditions for different stakeholders to operate in the system, which is necessary when using a tool developed by private organisations in EU policy making. Further improvements can strengthen the system’s ability to respond to fast-evolving geopolitical contexts and policy needs, whilst preserving and developing the core principles, such as **inclusiveness**, that have made the ESS.

Environmental stakeholders, as representatives of the public interest, have an important role to play in shaping standards that support the EU's environmental priorities and reinforce the Single Market. These priorities are clearly set out in the Competitiveness Compass, the Clean Industrial Deal, the Commission's Annual Work Programme, and key policy frameworks such as the European Green Deal, the Green Deal Industrial Plan, the New Industrial Strategy, the Fit for 55 legislative package, and the REPowerEU Plan.

To secure lead markets we need ambitious, clear, and forward-looking requirements securing the primacy of mandatory legislation, underpinned by harmonised standards (hENs) entailing robust test methods, assessment methodologies, and technical specifications.

In our response to the call for evidence, ECOS provides valuable insight on the main challenges within the ESS, both directly experienced as a stakeholder and those identified in the EC's evaluation report. We also propose improvements to address these challenges.

## Accelerate standards drafting without compromising quality

ECOS acknowledges the importance of the timely availability of hENs, which are necessary to support EU legislation. However, we would like to highlight the risks of implementing non inclusive fast-track procedures. The success of the ESS rests on collaboration among industry experts, public administrations, civil society, and academia, to deliver standards that truly meet both private and public interests.

The consensus building process, stakeholder and national consultations, as well as the overall quality of the standardisation deliverables need to be preserved. Due to the fact that hENs are part of EU law, it is essential that the entire hEN process is overseen, managed, and closely monitored by the EC.

The challenges identified by the evaluation report confirm that improvements in the system are needed and ECOS therefore recommends the following:

### 1. Standardisation Request (SR) stage

Existing planning tools, such as **the Annual Union Work Programme (AUWP)** for European standardisation, should be used strategically and effectively by all the EC services to ensure that all standardisation needs are identified and requested in due time. In terms of consultation, it is important that the AUWP accurately reflects standardisation needs for legislative purposes. To ensure this, the AUWP should be developed in a way that prioritises the requirements of legislation and remains free from undue influence or bias from other interests. The AUWP would serve well as a tool to identify fast-track priorities, ensuring that each of these priorities is matched with the necessary budgetary resources for effective and timely implementation.

- To save time, the EC should pro-actively develop SRs as soon as possible to pre-empt the standardisation work and ensure the standardisation process starts as early as possible.

To ensure a smooth and straightforward standardisation processes, more structured exchanges are necessary. These exchanges should aim at strengthening guidance to all Directorates-General (DGs) to ensure both **ESOs and Annex III are involved in structured exchanges with the EC as early as possible**. The objective being to develop as clear SRs as possible which go through thorough consultations with all relevant stakeholders to avoid misunderstandings and possible deviations from the scope.

- **Deadlines** for the finalisation of the standardisation deliverables should be fixed according to the regulatory needs and hence, negotiations on extensions should be avoided when contributing to the draft SR at the Standardisation Request ad hoc groups (SRAHG) within the ESOs.

- The EC needs to ensure ESOs adopt a more pragmatic approach towards SRs and ensure the experts sitting in CEN CENELEC SRAHGs and ETSI OCG assess thoroughly the draft SR in terms of technical feasibility but also in terms of expert commitment and availability of resources to conduct any round robins or testing campaigns etc within the timeframe determined by the EC.
- SRs are a critical element as they mark the interplay between regulations and the underpinning technical standards and hence, need to be overseen by the EC. Frequent progress checks with the ESOs, including on legal and technical content (and not only form), would prevent potential delays and ensure that the hENs developed are appropriate to support regulations and be ultimately cited in the OJEU.

## 2. Standard development stage

It is important to work with the ESOs on finding concrete solutions to accelerate the development and publication of standards when a fast track is opted for. All administrative stages should be critically reviewed, shortened and/or cancelled if possible, in order to save time. It is, however, crucial to ensure that most important stages are kept, namely:

- **The review of the SR by the SRAHG:** It is important to maintain the role of the SRAHG, as it enables experts to review the draft SR before it is submitted for approval by the Member States. This review process offers the EC an opportunity to ensure that all relevant stakeholders expected to contribute to the standardisation work have examined the draft SR in advance and agree to the timeframe set by the EC.
- **The standard drafting stage and consensus building:** This stage is of utmost importance and must involve all relevant stakeholders. The standardisation organisations should be required to demonstrate how they ensured broad stakeholder participation during the drafting and whether the concerns of under-represented stakeholders, including Annex III organisations, have been adequately addressed by the working group and the technical committee.
- **The enquiry stage:** the handling of comments needs to be preserved and NSBs/NCs need to ensure enough national consultation periods.
- The formal votes.

There is a need to optimise the HAS assessment process and to ensure the HAS consultants can assess the draft initiated at the international level as early as possible. The use of digital tools to facilitate the development and the access to standards is also important.

## 3. Citation in the OJEU stage

To improve citation, the EC needs to move fast once the assessment of the candidate hEN is positive. In this regard, the EC needs to commit to optimize the EC's internal process to approve citation but also provide clear guidance to ESOs on the key legal obstacles that frequently delay publication. Addressing these challenges is essential to ensure a timely reference to hENs in the OJEU.

## Adopting alternative routes, only if inclusive and used as fall-back options

In cases when the traditional standardisation route is hindering or considerably causing delays on methodologies that are vital for policy implementation, e.g. where ESOs would block or reject a SR, or undue delays in the development and publication of mandated standards, we believe that the EC should consider alternative technical solutions. It is important that alternative options, such as resorting to other standardisation organisations or the development of common specification/transitional methods are used only as fall-back options to avoid fragmentation and heterogeneity in the processes and deliverables. This will provide flexibility to the standardisation system and incentivise the stakeholders participating via the ESOs to deliver qualitative standards in a timely manner.

It is, however, fundamental that, in the event of opting for these alternative solutions, clear process criteria and adequate consultation mechanisms are put in place.

### Criteria need to be clear from the outset

Alternative options should be seen strictly as fall-back options. In the specific case of common specification, their use must be guided by clear, transparent, and objective criteria, such as the criteria adopted in article 20 of the Machinery Regulation 2030/1230. For instance:

- When a Standardisation Request is **not accepted** due to ESOs internal rules, structures, or in the case where some stakeholders delay the process due to reservations over regulatory decisions already taken.
- When hENs are **not delivered** within the agreed deadline.
- When hENs do **not comply** with the SR and when essential requirements set by legislation are not covered by available standards.

### Process, clarity, and inclusiveness are essential

Inclusiveness should always be a requisite, whether we are following the traditional standardisation routes or opting for alternative fall-back options. Equally important, it is essential that there is full clarity regarding the process under which these possible fall-back options will be developed for stakeholders to be able to participate and provide input effectively.

In the specific case of common specification, to ensure their legitimacy and long-term coherence, several critical issues must be reflected upon before implementation:

- **A clear governance is needed**, such as (i) who will be in charge of coordinating the development of common specifications, (ii) how will stakeholder consultation be organised and (iii) how will feedback be integrated into final drafts.
- **Clear deadlines**: The process should also follow **clear and enforceable deadlines**.
- **Maintenance**: It is crucial to determine who will be responsible for updating and revising the common specifications over time, as well as to define the procedures to do so.
- **Defining the boundaries of common specifications**: it is key to define the interplay between the possible common specifications and the hENs delivered by the ESOs. Guidance must be provided on questions that remain unclear; e.g. will common specifications be used as a temporary measure? How will this affect the presumption of conformity with legal requirements? How can market fragmentation be avoided?

## Reinforce inclusiveness by supporting the effective participation of civil society

The Standardisation Regulation R1025 has made the standardisation process more inclusive, officially recognising the environmental, consumer, employee, and SME interest as key within the ESS. This has allowed for the representation of a greater variety of interests and expertise in the otherwise industry-dominated process. Consumers, small businesses, and environmental and social organisations were all given a seat at the table - this participatory approach is necessary for the ESS to operate according to EU values.

As standards do no longer only deal with technical aspects, but can have an impact on public policy, people, workers and the environment, an inclusive and multi-stakeholder approach brings important checks and balances to standards-making. However, despite the different existing strategies to promote the engagement of environmental stakeholders in standardisation, **effective participation remains too low**. This is even more acute at the national and international levels.

Both international and national standardisation processes have a strong impact on the ESS and its deliverables. Hence, it is critical to ensure the inclusive and effective participation of civil society and SMEs in **national**, **European**, and **international** standardisation, to guarantee a pool of future experts to achieve a well-functioning standardisation system.

### Enhance inclusiveness at the European level

The Standardisation regulation R1025 should ensure that inclusiveness and effective participation of societal stakeholders is implemented beyond the mere obligation of efforts as captured in Articles 5 and 16 of Regulation R1025, but also aim at actual results. Having access is not the same as having **equal access**.

Following the entry into force of the standardisation regulation R1025 in 2012, the ESOs had to adapt their internal rules to fulfil the provisions and some measures have been put in place to facilitate the participation of the so-called Annex III organisations indicating progress. However, the unbalanced representation within working groups and technical committees, the non-existent weight in the decision making models, the lack of representativeness within the national position, the lack of systematic awareness of the role and rights of Annex III organisations or the lack of formal mechanisms to ensure our concerns are duly integrated into the standards-drafting processes continues to hinder the effective consideration of our contributions.

Another important point to highlight is the consultation processes conducted by the EC. While critical in the development of hENs, it has not been consistently ensured. We would like to stress the importance of involving Annex III organisations early in strategic discussions, a step that is often overlooked. For example, in the context of the revised Industrial Strategy, which proposed the establishment of a Joint Task Force between the EC and the ESOs to define solutions on standards identified as critical, the participation and contribution of environmental NGOs and other Annex III organisations was not adequately ensured.

### Facilitate effective participation in national standardisation bodies

In the context of developing hENs to support policy, the European and International Standardisation Organisations, i.e. CEN, CENELEC, ETSI, ISO, and IEC, need to develop those standards under the national delegation principle. This means that the members of these standardisation organisations are National Standards Bodies (NSBs), often government bodies, that consist mainly of experts from private companies.

While this organised industry representation is necessary and valid when defining voluntary technical specifications with pure market relevance, the underrepresentation (sometimes even misrepresentation) of other interests, e.g. environmental or consumer, should be addressed by member states.

Standardisation regulation R1025 aims to balance the public and stakeholder interest and business interests. However, societal stakeholders continue to face significant barriers to participation at national level. These include a lack of financial support from member states, insufficient expertise, and unequal access conditions across different NSBs, which hinder inclusiveness. This lack of inclusiveness hinders the representation of diverse interests not only when drafting standards at national level, but more importantly, when sending national delegations that contribute to the drafting of the **European** and **international** standards. In the current regulation a series of measures aimed at encouraging and facilitating the access of SMEs to standards and standardisation processes already exist (ref. Article 6) and should also be applied to societal stakeholders.

The recently published report on inclusiveness in national standardisation by the High-Level Forum on Standardisation offers a national peer review as well as a comprehensive list of recommendations to improve national inclusiveness<sup>i</sup> that should be implemented with no delay.

ECOS has also assessed existing national practices related to inclusiveness across various Member States<sup>ii</sup>. While many still lag behind in terms of facilitating effective participation of under-represented stakeholders, some best practices in terms of national funding mechanism or free participation for ENGOs show that improvements can be made.

## **Going international promoting European principles**

The outsourcing of EU standard-setting to international standardisation is growing - as of June 2023, 34,4% of all CEN's standards originated from ISO publications and 74,4% of all CENELEC's standards come from IEC.<sup>iii</sup> The conditions for developing international standards are however different from the European conditions, in particular, regarding the facilitation of the effective participation of societal stakeholders. This is particularly relevant when internationally grown standards will be taken up as European standards to underpin EU legislation as all mandatory provisions in Regulation R1025, also in terms of inclusiveness, need to be met.

The key existing principles, mechanisms, and rules for engagement of societal partners and SMEs in international standardisation are not fully aligned with the European regulatory framework. These differences limit the participation of European societal stakeholders and SMEs and should be addressed. Endorsed by the High-Level Forum on EU standardisation, the report on "Greater civil society and SME inclusion in international standardisation"<sup>iii</sup> provides an analysis of the limitations to participation that need to be tackled as well as a set of recommendations that should be implemented with no delay.

Especially in the current context of an overall lack of technical expertise, and the development of new standardisation areas at global level, proactive engagement of consumer, environment, trade union and SME representatives is of paramount importance for international standards-making too. Furthermore, it is our opinion that a reinforced presence of such stakeholders in international standardisation is key to realise the EU ambition to be a global standards setter.

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<sup>i</sup> European Commission (2025) Workstream 3 [NSBs – peer review \(+ SMEs & civil society inclusiveness\)](#)

<sup>ii</sup> ECOS (2024) [Access granted? Best practices for including NGOs in the work of National Standardisation Bodies](#)

<sup>iii</sup> European Commission (2025) Work Stream 5 [Inclusiveness of civil society and SMEs in international standardisation](#)

## Encourage national transposition of hENs through enhancing quality and transparency

Standardisation is an increasingly important mechanism for facilitating intra-EU and global trade, opening-up markets and creating a level playing field for environmentally friendly alternatives to polluting products. Currently, three key indicators point to the need for improving the quality of hENs:

- The remaining high number of negative HAS assessments
- The significant share of non-cited standards in OJEU
- The volume of formal objections raised by Member States

While there has been substantial progress in recent years, these persistent issues signal that further improvements are necessary. A focus on speed only at the expense of quality risks undermining the effectiveness and credibility of the entire system. It is essential that the ESS ensures genuine harmonisation and effective transposition, thereby aligning European and national standards to support EU policy objectives.

As regards transparency, the revision should help ensuring that ESOs and NSBs are handling standardisation committees and mirror committees, respectively in a **transparent manner**, that the consensus building rules are clear, that the national position is safeguarded and well reflected at EU and International level, and most importantly that the composition of these committees **ensure a fair representation of all stakeholders types**, in particular of the environmental stakeholders, where their interests are to be documented and made openly available online.

## Environmental ambition will make Europe the standards-maker

The revision of R1025 should take the opportunity to ensure that standards are developed in a “**fair, inclusive and scientifically sound approach**”. This is already an established principle under the Montreal Protocol. Timing and anticipating needs are critical in standardisation, it is therefore very important that the EC moves fast in identifying the EU's strategic dependencies linked to the twin transitions, e.g. raw materials, leadership in clean energy technologies, batteries, or hydrogen, and move fast in regulatory and standardisation developments.

The EU should take this opportunity to act as the standard maker in the international arena. In cases where existing international standards fall short in matching the European environmental ambition, e.g. e-mobility, Europe should push the global agenda. A key competitive edge that Europe has is environmental ambition. Together with Europe's other competitive edge, innovation, environmental ambition, realised through ambitious Standardisation Requests, will make Europe *the* standards-maker.